



**Spelthorne Borough Council**

**Housing Delivery Test Action Plan**

**November 2021**

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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) 2021 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 in January 2021. Spelthorne Borough Council scored 50%. This compares with a figure of 60% for 2020 and 63% in 2019. The figure has, therefore, moved 10% downwards from last year and 13% down on the 2019 figure (the higher the percentage the better). As a result, and in response to this, the Council has produced a third 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 The Housing Delivery Test Action Plan sets out key priorities and actions that the Council are undertaking to improve housing supply and delivery. The plan in itself is not a decision-making document but seeks to identify opportunities to improve housing provision.
- 2.4 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 611 (+20% buffer) dwellings per annum (2021).
Emerging Local Plan	A replacement Local Plan is currently being prepared. The Preferred Options consultation took place from November 2019 – January 2020. The Regulation 19 consultation is scheduled for early 2022. The final adoption is anticipated to be in June 2023.
Corporate Plan 2016 -2019  It should be noted that there is an emerging revised Corporate Plan for 2022 – 2025	Identifies four priorities: <ul style="list-style-type: none"> <li>• Affordable Housing</li> <li>• Economic Development</li> <li>• Clean and Safe Environment</li> <li>• Financial Sustainability</li> </ul>

Corporate Document	Overlap with Action Plan
The Capital Strategy, February 2021	Sets out the Council's need for capital financing, why and what the money will be spent on. Identifies three priorities: <ul style="list-style-type: none"> <li>• Delivering affordable housing</li> <li>• Achieving the regeneration of our town centres</li> <li>• Ensuring a sustainable future in recognition of declaring a climate emergency</li> </ul>
Housing Strategy 2020 - 2025	Strategic priorities 2020-2025: <ul style="list-style-type: none"> <li>• Priority 1: Enabling the delivery of more affordable homes</li> <li>• Priority 2: Promoting independence and wellbeing</li> <li>• Priority 3: Prevent homelessness and rough sleeping</li> </ul>
Homelessness and Rough Sleeping Strategy 2020 - 2025	This identifies five strategic priorities: <ul style="list-style-type: none"> <li>• Priority 1: End the use of private sector emergency accommodation</li> <li>• Priority 2: Reduce the length of stay in temporary accommodation</li> <li>• Priority 3: Nobody sleeps rough in Spelthorne</li> <li>• Priority 4: Increase use of the private rented sector for homelessness prevention and relief</li> <li>• Priority 5: Invest in staff training and development in order to improve the customer journey within the Housing Options service</li> <li>• Priority 6: Improve partnership working to prevent and relieve homelessness</li> </ul>
Economic Development Strategy 2017 - 2022	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

- 2.5 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**

- 2.6 Once planning permissions have been granted, local planning authorities have limited influence over deliverability. The timescales for implementing a planning permission are 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”.*

- 2.7 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. Nevertheless, a two year time period for all residential permissions was introduced on 2 January 2020. It is too early to say whether or not this has had a positive impact on housebuilding. This is because there will need to be a two year plus period before any real change is evident and there has only been one year. In addition, housebuilding activity has been significantly adversely affected by COVID-19.
- 2.8 Planning Officers have continued to build relationships with developers, landowners and agents and carry on a dialogue after planning permission is granted. The Council has previously written to agents on sites delivering 5+ net dwellings in the pipeline of sites with planning permission.
- 2.9 Officers have also contacted landowners of sites identified in the Strategic Land Availability Assessment to confirm the anticipated delivery timeframes of sites in the pipeline.

### Planning Decision Making Performance

- 2.10 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 floor space 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 floor space, changes of use

Others – mainly householder schemes

2.11 In the last financial year (April 2019 – March 2020) – Spelthorne met all three performance measures as shown in Table 2.

**Table 2 Planning DM Performance (April 2020 – March 2021)**

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
18	18	100%	60%	157	136	87%	65%	523	495	95%	80%

2.12 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.

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

2.14 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.

2.15 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	2020 Threshold and assessment period	Spelthorne’s Performance
Speed of major Development	<b>60%</b> (October 2019 to September 2021)	<b>100%**</b> (October 2019 to March 2021)
Quality of major Development *	<b>10%</b> (April 2019 to March 2021)	<b>2.38%***</b> April 2019 to March 2020)*
Speed of non-major Development	<b>70%</b> (October 2019 to September 2021)	<b>95%**</b> (October 2018 to March 2020)
Quality of non-major Development *	<b>10%</b> (April 2019 to March 2021)	<b>0.95%***</b> April 2018 to March 2020)*

\* Final figures not available until end December 2021.

\*\* High figure equates to a better performance

\*\*\* Lower figure equates to a better performance



- 2.16 These statistics demonstrate the soundness of decision making by Planning Development Management (PDM) 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 with reports on Planning Performance.
- 2.17 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 A2 Dominion. 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 A2 Dominion 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. More information is provided later on this document about the Councils 100% Council owned company Knowle Green Estates Ltd and its more recent role in housing delivery.
- 2.18 The Council's Housing Strategy 2020 - 2025 contains three strategic priorities which contribute to achieving "residents having somewhere to call home, which is suitable and affordable, is fundamental to having a good quality of life and contributes directly to sustainable and cohesive communities."
- 2.19 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 (which is currently subject to review)
  - Key worker accommodation
  - Impact of COVID-19 and the wider economic impacts especially in relation to housebuilding
- 2.20 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 Service.

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

#### The New Local Plan

- 3.2 The Preferred Options consultation (Regulation 18) took place from November 2019 – January 2020. The preferred approach is to provide housing development through 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 The Publication Local Plan (Regulation 19) consultation is scheduled for early 2022.
- 3.4 It is estimated that the five year housing land supply in the Borough is 3,286 units. Of the sites identified in the Strategic Land Availability Assessment (SLAA) 2020, approximately 1,200 are expected to come forward in Staines-upon-Thames within the next 5 years. More widely, publicly owned sites account for 1,500 units over the next 15 years (approximately 200 units from this source are within sites not owned by Spelthorne Borough Council).
- 3.5 A formal call for sites was issued in March 2021 whereby landowners and local stakeholders were invited to submit potential sites for development over the next 15 years. This identified a notable quantity of sites for possible allocation in the emerging Local Plan. Officers are in the process of analysing these to determine their development potential. An open informal call for sites remains on the Council's website.

#### Digital Engagement

- 3.6 The key change to consultation techniques is reaching out to our communities through digital engagement. Although traditional methods are still being used the majority of engagement is now done via online communication which has proven more effective and engaging in promoting planning policy consultations and opportunities to discuss major planning applications.
- 3.7 The Council uses its social media platforms to provide information and notifications regarding planning consultations and schemes. The 'Inovem' platform has been used to consult the public on various planning consultations, including the Staines Development Framework – Objectives and Options consultation, to which over 700 participants responded.

## Council/Knowle Green Estates housing schemes

- 3.8 The Housing Strategy sets out an action plan on the delivery and monitoring of the strategy. These include enabling the delivery of more affordable homes, promoting independence and wellbeing to enable people to remain in their homes and preventing homelessness and rough sleeping
- 3.9 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.
- 3.10 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 (644 units to be delivered by the Council out of a required 3,286). KGE has bolstered the Council's control over and aided its ability to directly boost the delivery of housing. Given the significant impact that Council-led schemes have had on housing delivery in the past few years, it is paramount that Spelthorne Borough Council continues to be proactive in this field and utilises its assets moving forward to deliver much needed housing for the community.
- 3.11 KGE performs several functions on behalf of Spelthorne Borough Council, as outlined in the table below.

**Table 4 Knowle Green Estates**

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

- 3.12 To date, Spelthorne Borough Council 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

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

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

Work commenced 14/06/19

Occupied : April 2021 (fully occupied

September 2021)

West Wing, Spelthorne Borough Council, Knowle Green Staines-upon-Thames

Planning ref. 18/01267/PDO Conversion to provide 25 affordable rented residential units

Approved 17/10/18

Occupation anticipated November 2021

More detail on future schemes and future actions are set out in section 4 below

### **Improved Decision Making**

- 3.13 The Planning DM service has undertaken a number of initiatives to improve decision making and boost the timely delivery of housing. These include:

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

The Planning DM Officers regularly undertake pre-application advice. In 2020 a total of 288 planning enquiries were dealt with. These took place remotely because of the Covid 19 lockdowns. It should be noted that many of the other Surrey Authorities ceased providing advice during the same period. 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. This means a quicker turnaround can be achieved which subsequently can lead to the faster implementation of planning permissions for housing delivery. 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: the former Bugle Public House for eight flats (17/01028/FUL), Drake house Staines-Upon-Thames for 14 flats (19/01070/FUL), Ex Serviceman's Club, Staines-Upon-Thames for 14 flats (19/01237/FUL) and the former Centrica site, Staines-Upon-Thames, for 467 flats (19/00290/FUL) plus an additional 22 flats (19/01051/FUL).

#### Use of Planning Performance Agreements

The Council has introduced a new service offering planning performance agreements (PPAs) for major development proposals, which often involve a large quantum of housing units. 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. 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 Website

The planning pages of the website have been updated and is constantly under review. 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 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. In addition, Planning DM officers have made presentations to Councillors on a number of complex planning applications this year including, the new Leisure Centre and residential proposals at Elmsleigh Road, Renshaw Industrial Estate and London Square. These presentations took place after the Planning Committee agenda had been made public and before the Committee 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. These presentations were all undertaken virtually during the Covid 19 lockdown period.

#### The Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) was implemented on 01 April 2015. Contributions are used to fund both local and strategic infrastructure to support development in the Borough. The management of the CIL process is the responsibility of the Council's Infrastructure Delivery Co-ordinator. The Council

has recruited a part time CIL administrator to resource the collection process, allowing the Infrastructure Delivery Co-ordinator to focus on the governance of spending the levy and coordinating spending alongside the implementation of the Council's new Local Plan. In 2019 the Council purchased new dedicated CIL software (Exacom) which will improve the monitoring of CIL and s106 agreements. Moving forward it will be important for the Council to ensure that adequate infrastructure is in place to support the delivery of housing. The Infrastructure Delivery Plan (IDP) will be published alongside the new Local Plan. The IDP will analyse and assess the existing infrastructure provision, the current shortfall and identifies the existing and future needs and demands for the borough to support new development and a growing population.

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

The Council has the option to utilise Compulsory Purchase Powers to help unlock potential development sites. In Staines town centre the Council has worked with developers to help unlock areas of land to enable larger schemes. Developers have now acquired 15 London Road (adjacent to the 17-15 Berkeley Homes site) and planning permission has now been granted to incorporate this small site into the Berkeleys scheme. Other developers are actively seeking to acquire 116-120 High Street (adjacent to the Charter Square development), following the Council's engagement but the Council have the opportunity in future to assist with similar scenarios in future.

#### 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 (phases 1A and 1B- former Majestic House Site, now known as London Square) and also 15-51 London Road (Berkeleys scheme), the latter being under construction.

#### Engaging with key stakeholders

The planning and enforcement officers have held 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 worked hard to

improve the total process. A further concern related to the length of time taken to discharge of contaminated land conditions. Planning Officers have been engaging with Environmental Health Officers on this matter to improve performance in this area. The improved efficiency of discharging planning conditions can boost the completion of schemes and in turn boost housing delivery.

#### 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.
- Probity and decision making in planning
- 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 (two sessions)
- Flooding
- Permitted Development (two sessions)
- Use Classes Order (two sessions)
- Minerals
- County planning
- Transportation
- New local plan and decision making

#### Planning Officer Training

Planning and Enforcement Officers undertake regular training on a range of planning issues and other matters where relevant in order to keep abreast of developments. This is, and will, continue to be an on-going and necessary requirement of their posts and for some officers, their membership of the Royal Town Planning Institute.

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

A review of all planning conditions has been undertaken by senior planning officers. This has resulted in the streamlining of conditions to ensure that they meet up to date guidance on the use of conditions and to safeguard against their use where other non-planning legislation would be more appropriately employed. Council Planning officers have worked with Environmental Health Officers to achieve this, particularly with contaminated land, noise and extraction equipment. Conditions are constantly being reviewed and updated where appropriate.

#### 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 on this.

### Technology

Over the past year, the Planning DM section has accelerated its use of technology in the processing of planning applications. This includes:

- No paper files, all processing is via the Idox Uniform IT system
- The use of Enterprise for the "in-tray" process of processing the cases
- All decision notices are automatically emailed to the applicant
- All correspondence is now sent electronically except where an email address is not available

The use of technology has greatly assisted in processing applications more quickly and keeping the applicants, councillors and third parties better informed.

## **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 (SLAA) 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 2021. 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<sup>1</sup>.
- 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.

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<sup>1</sup> <https://www.spelthorne.gov.uk/SLAA>



- 4.5 The current review of the Council's Local Plan has identified a need to create around 611 housing units each year over the next 15 years. As part of its Preferred Options Consultation in late 2019 - early 2020, the Council consulted on its preferred spatial strategy to meet development needs, comprising the following:
- Maximising densities in suitable locations
  - Releasing some Green Belt
  - Producing a masterplan for Staines-upon-Thames.
- 4.6 It is estimated that the five year housing land supply in the Borough is 3,286 units. Of the sites identified in the Strategic Land Availability Assessment (SLAA) 2020, over 1,200 units on the identified sites are expected to be delivered in Staines-upon-Thames. More widely, publicly owned sites account for 1,500 units over the next 15 years (approximately 200 units from this source are within sites not owned by Spelthorne Borough Council).
- 4.7 The Local Plan strategy is currently being solidified following the Preferred Options consultation, however as the Borough's principal town, Staines-upon-Thames is likely to be a key residential opportunity area. A Masterplan is currently being 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 1,100 units in the next 15 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 landowner, 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	140	Years 1 - 5
Hanover House and Bridge Street car park	Flatted	75	Years 1 - 5
Oast House, Kingston Road	Flatted	180	Years 1 - 5
William Hill/Vodafone, 91 High Street	Flatted	12	Years 1 - 5
Riverside car park (subject to re-provision)	Flatted	100	Years 6 - 10
Elmsleigh Centre and adjoining land	Flatted	250	Years 6 - 15
Tothill Carpark	Flatted	200	Years 6 - 15
Communications House	Flatted	200	Years 6 - 15

The exact numbers of dwellings shown in the above sites are, of course, subject to planning permission being obtained.

- 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 (affordable rented)	12	Following Local Plan adoption

White House, Kingston Road, Staines	Homeless accommodation	33	Planning approved. Completed October 2021
Benwell House, Green Street, Sunbury, Phase 2	Flats (affordable rented)	32	First phase approved and occupied. Second phase the subject of a planning application (19/01211/FUL) which was refused by the Planning Committee on 13/10/21. Future options to be considered
Ashford Multi-Storey Car Park	Flats (affordable rented)	50	Planning application anticipated in due course
Ashford Hospital Car Park (known as Victory Place)	Flats (affordable rented and key worker)	127	Planning application pending consideration which is due to be considered by the Planning Committee in November or December 2021
Harper House, Fordbridge Road	Short term emergency accommodation	20	Planning approved October 2019. Due for completion October 2021

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

4.11 Table 10 in Appendix 2 shows, in the final column, the consequences resulting from the Housing Delivery Test for the current year. 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. This means that planning permission should be granted unless the harm caused by the application significantly outweigh the benefits. The term tilted balance is used to define this passage of policy because when engaged, the tilted balance should change the ‘balancing exercise’ which the decision-taker (the planning officer, inspector or secretary of state) makes when deciding whether or not to grant planning permission; from a neutral balance where if the harms outweigh the benefits planning permission is usually withheld, to a tilted balance where the harms should *significantly and demonstrably* outweigh the benefits for permission to be withheld. Similarly on planning appeals, inspectors will give due regard to the presence of the presumption in favour of sustainable development.

This means that on balance, a greater number of appeals may be allowed. This highlights the importance of not only boosting housing delivery but of having an up-to-date Local Plan to ensure that needs can be met through the identified supply.

4.12 The table below shows a projection of the number of homes required and the anticipated number of homes delivered by 2022. The information set out provides a conservative estimate of delivery based on average completions over the previous three years. This does not take into account the measures proposed by the Council to boost housing delivery, such as the Local Plan or Development Management controls. Anticipated completions are therefore expected to be higher than the very cautious estimate below.

**Table 7 Spelthorne – Housing Delivery Test 2022 - Projected**

No of home required			Total homes required	No of homes delivered			Total homes delivered	HDT Test %	Consequence
2019-2020	2020-2021	2021-2022		2019-2020	2020-2021	2020-2021			
552 <sup>2</sup>	606	611	1769	228	639	401 <sup>3</sup>	1268	72%	Action Plan + 20% Buffer + Presumption

<sup>2</sup> Covid-19 Adjustment. The period for measuring homes required in 2019/20 reduced by 1 month.

<sup>3</sup> Estimated based on average of previous 3 years. Delivery is likely to be higher as 700 units under construction.

**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 continue to liaise with applicants following planning permission to speed up procedures, especially the discharge of planning conditions, to enable an early start on site as possible.	Planning Development Management	Ongoing
To review the time condition now imposed on all new residential planning permissions requiring development to commence within a two year rather than three year time period within a shorter timescale than the relevant default period, where this would expedite the development without threatening its deliverability or viability.	Planning Development Management	Ongoing
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 further refine the programme of Idox measures to enhance agile / paperless working in DM.	Planning Development Management	Ongoing

To further refine the programme of Enterprise measures for DM staff to manage workloads and performance, improve the use of resources and efficiency / performance.	Planning Development Management	Ongoing
To continue to develop and offer a proactive pre-application service to support the delivery of sustainable development.	Planning Development Management	Ongoing

**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.	Strategic 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 seek to achieve the maximum amount of Affordable Housing.	Planning (Strategic and Planning Development Management)	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	On-going. Exacom software will assist in processing information.

**Next Steps**

- 4.13 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.
- 4.14 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.

- 4.15 It is proposed that an annual report will be presented to Management Team 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.
- 4.16 The Council welcomes any suggestions to improve the delivery of housing in Spelthorne
- 4.17 It is proposed that this plan will be made publicly available on the Council's website.

**Esmé Spinks**  
**Planning Development**  
**Manager**

**Hannah Bridges**  
**Principal Planning Officer**

**Spelthorne Borough Council**

**November 2021**



**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.

Planning White Paper 2020

- 1.3 In August 2020, the Government published a White Paper– titled “Planning for the Future” – which set out proposals for changes to the planning system. The period for consultation ran until 29 October 2020. The paper proposed fundamental changes to a greater level of detail provided at the plan-making stage. The paper proposed three types of land should be identified in a Local Plan: Growth, Renewal and Protected areas which would in effect replace the current process of site allocation within the Local Plan. The white paper commented that the standard method for establishing housing requirements could be changed to factor in land constraints including Green Belt and would be consistent with the Government’s 300,000 homes per year target which was initially outlined through the Autumn Budget of 2017. This is proposed to continue to focus on areas with lowest affordability. Further detail on this is awaited and a separate consultation on the standard method has been published. There were several other proposals outlined in the White Paper concerning planning applications, appeals, enforcement, technology and design. Since the publication of the White Paper no

further updates have been provided. More recently in September 2021, a new Secretary of State was appointed, Michael Gove and it is anticipated that the Planning Bill is likely to be delayed in the short term.

- 1.4 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) February 2021;
  - 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: 2020 Measurement Technical note (January 2021).
- 1.5 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.
- 1.6 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

- 1.7 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
- 1.8 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. The Preferred Options consultation (Regulation 18) took place from November 2019 – January 2020. The Publication Local Plan (Regulation 19) consultation is scheduled for early 2022. The programme for preparing

the local plan documents is available online<sup>4</sup>.

- 1.9 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.

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<sup>4</sup> <https://www.spelthorne.gov.uk/article/19897/Local-Development-Scheme>

## 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 published in January 2021 updates the previous result published in February 2020. This 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 (606 dwellings per annum as of February 2021<sup>5</sup>). The calculation is given as:

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

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 (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. The three year transitional period has now ended therefore the HDT consequences will be standardized moving forward.

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<sup>5</sup> The 'number of homes required' within the HDT calculation for 2019-20 is lower than the Local Housing Need figure to account for the impacts of the Covid-19 pandemic. The requirement is therefore 552.

- 2.3 The presumption in favour of sustainable development will now apply if the test result is less than 75% from November 2020.
- 2.4 In the 2020 HDT measurement, published in 2021, there were 55 councils below 75% and consequently now face the 'presumption in favour of sustainable development'. The 2020 housing delivery test figure for Spelthorne is 50%, meaning it now faces this consequence. This calculation is based on the data set out in Table 10.

**Table 10 Spelthorne – Housing Delivery Test: 2020 Measurement (published January 2021)**

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	552	1,574	221	337	228	785	50%	Presumption in favour of development

- 2.5 As a consequence, Spelthorne is required to produce an Action Plan within a period of 6 months of publication of the Housing Delivery Test measurement.
- 2.6 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 9165 new homes (611 dwellings per annum) is being made through the emerging Local Plan, scheduled for Adoption in June 2023. The Council has again challenged the standard method figure, largely due to the constraints present in the Borough. The Council will continue to plan for the Local Housing Need figure to comply with the current national planning policy and guidance but is seeking to align its housing needs with the more recent 2018-based household growth projections that have been published, rather than the 2014-based projections which currently form part of the standard method calculation.

- 2.7 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”.*

- 2.8 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 possible consequences are based on the following:

95% = Action Plan

85% = Action Plan + 20% buffer

75% = Action Plan + 20% buffer + presumption in favour of development

**Table 11 Surrey Local Authorities – Housing Delivery Test 2020**

Local Authority	No of homes Required			Total Homes required	No. of homes delivered			Total Homes Delivered	HDT Test %	Current Consequence 2020 HDT Measurement
	2017-2018	2018-2019	2019-2020		2017-2018	2018-2019	2019-2020			
Elmbridge	443	623	573	1,639	130	427	396	953	58%	Presumption + 20% Buffer + Action Plan
Epsom and Ewell	413	577	529	1,519	162	165	185	512	34%	Presumption + 20% Buffer + Action Plan
Guildford	551	563	515	1,628	299	543	622	1,463	90%	Action plan
Mole Valley	318	447	411	1,176	425	374	157	956	81%	20% Buffer + Action Plan
Reigate and Banstead	465	465	426	1,356	601	528	492	1,621	120%	None
Runnymede	394	511	468	1,373	806	665	381	1,852	135%	None
Spelthorne	424	599	552	1,574	221	337	228	785	50%	Presumption + 20% buffer + Action Plan
Surrey Heath	247	336	304	887	321	406	376	1,102	124%	None
Tandridge	464	649	593	1,706	332	249	268	849	50%	Presumption + 20% Buffer + Action Plan
Waverley	471	590	540	1,601	598	375	595	1,568	98%	None
Woking	300	431	394	1,124	358	231	305	895	80%	20% Buffer + Action Plan



- 2.9 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.
- 2.10 The tilted balance therefore increases the prospect of planning permission being granted because it ‘tilts’ the balance in favour of approving an application.

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

- 2.11 The Council’s housing target based on our local housing need is currently 611 dwellings per annum as of April 2021 and this comprises the basis for calculating the five-year supply of deliverable sites. In using the local housing need figure of 611 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 2020 (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 73) 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 733 (611 + 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 2021 to 31 March 2026. The effect of this increased requirement is that the identified sites only represent some 4.5 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 (2019) 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. As the housing target in its Core Strategy 2009 is more than five years old, the five year housing land supply should be measured against the area's local housing need calculated using the Government's standard method. Local Housing Need is currently 611 dwellings per annum in Spelthorne. Table 12 sets out the Borough's net housing completions against its housing requirement.

**Table 12 Local Housing Need & Delivery**

	Completions (net)	Local Housing Need (Min.)	Source	Shortfall to Min. OAN
<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
<b>2019 – 20</b>	228	599	LHN 2019	-378
<b>2020 - 21</b>	639	606	LHN 2020	+33

**Five Year Supply Position**

Need 2021/22 - 2025/26 = (5 x 611) =	3055
Buffer at 20% = (3055 x 1.2) =	3666
Annual need including 20% buffer =	733
Projected 5 year supply =	3286 <sup>6</sup>

<sup>6</sup> Spelthorne Strategic Land Availability Assessment, 2020  
Housing Delivery Test Action Plan 2021

**Housing supply (3094 / 708) =**

**4.5 years of supply or 90%**

### 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 2021 is set out in Appendix 4 Table 21.
- 2.16 House prices have continued to fluctuate. Table 13 illustrates 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**

	Type of Dwelling			
	Detached	Semi-detached	Terraced	Flat/Maisonette
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	£626,016	£436,594	£350,260	£248,872
March 2019	£623,430	£366,785	£346,192	£242,583
March 2020	£622,124	£436,085	£348,964	£238,159
% change 2013-2020	50%	£51%	£48%	42%

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

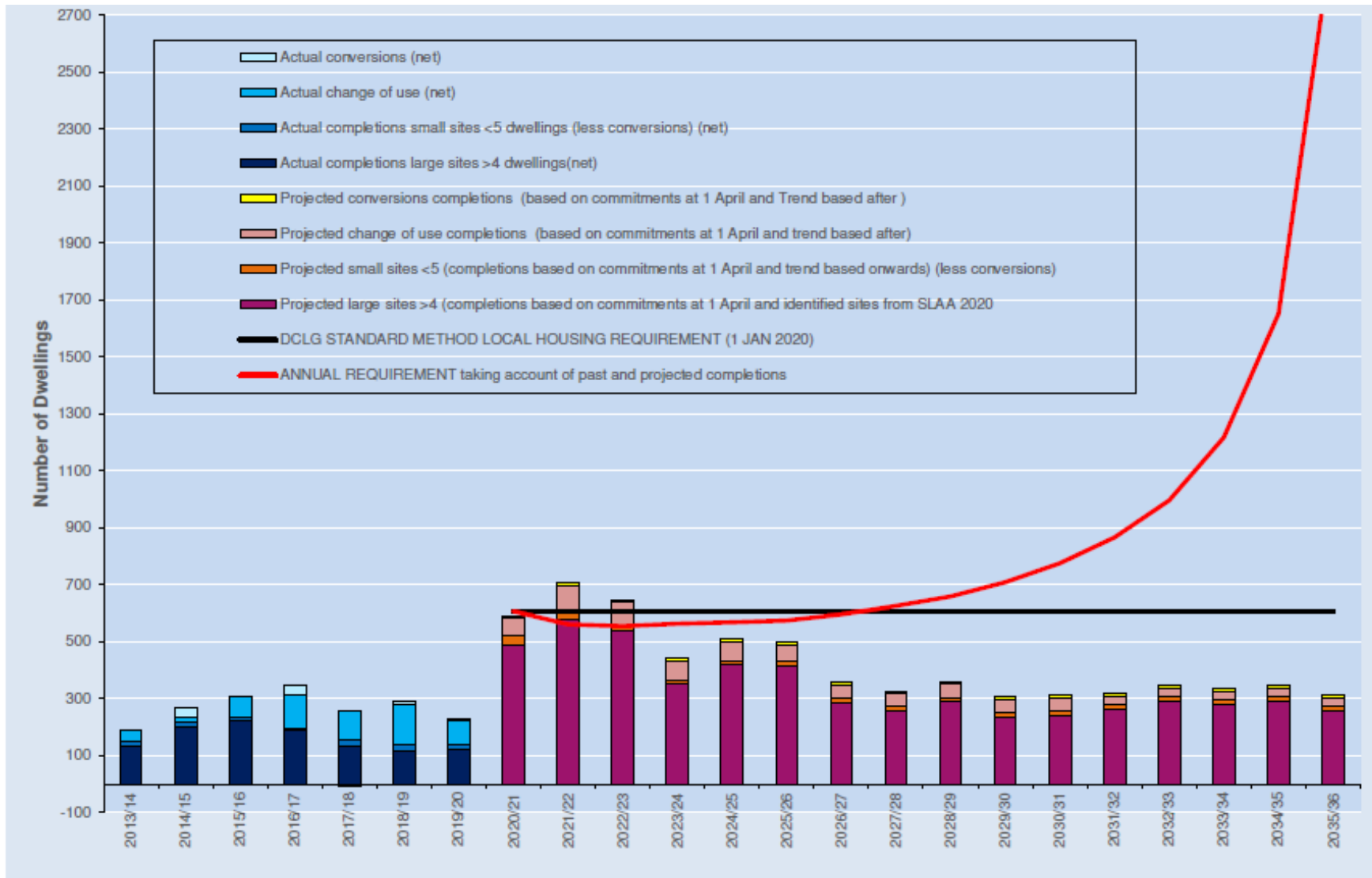
## **Projecting future provision**

- 2.18 The housing trajectory (Table 14 and Figure 1) shows housing completions for the last seven years and anticipated delivery for the next 15 years to 2036. It combines information on past completions, existing planning permissions and identified housing sites from the Strategic Land Availability Assessment 2020 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 2020-2036**

	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	2031/32	2032/33	2033/34	2034/35	2035/36
Actual Total completions (gross)	198	333	355	374	287	310	248																
Actual Total completions (net)	191	265	308	347	250	289	228	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Actual conversions (net)	2	29	1	34	-8	8	5																
Actual change of use (net)	37	20	71	118	102	140	87																
Actual completions small sites <5 dwellings (less conversions) (net)	20	14	14	8	22	23	17																
Actual completions large sites >4 dwellings(net)	132	202	222	187	134	118	119																
Annual Losses	7	68	47	27	37	21	20	32															
Under Construction at start of year (gross)	295	359	413	439	476	1010	1094	982															
Projected annual completions (net) all sources								589	704	645	440	508	500	358	327	360	308	312	318	346	334	347	310
Projected conversions completions (based on commitments at 1 April and Trend based after)								7	9	7	10	10	10	10	10	10	10	10	10	10	10	10	10
Projected change of use completions (based on commitments at 1 April and trend based after)								60	91	81	66	66	59	46	46	46	46	46	29	29	29	29	29
Projected small sites <5 (completions based on commitments at 1 April and trend based onwards) (less conversions)								33	25	19	11	11	16	16	16	16	16	16	16	16	16	16	16
Projected large sites >4 (completions based on commitments at 1 April and identified sites from SLAA 2020)								489	579	537	353	421	416	286	255	288	236	240	263	291	279	292	255
<b>ANNUAL REQUIREMENT taking account of past and projected completions</b>								606	560	554	563	568	574	595	625	658	708	774	866	996	1216	1651	2992
<b>SUMMARY OF SUPPLY</b>																							
<b>SLAA TOTALS (Sites &gt;4)</b>									180	219	157	225	220	286	255	288	236	240	263	291	279	292	255

**Figure 1 Draft Housing Trajectory 2020-2036**



2.20 Anticipated completions for the year 2020/21 are based on the assumption that 60% of the 982 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 2021/22 to 2035/36 the estimated net annual completions are based on the following components:

- Dwellings under construction (those not completed in 2020/21)
- 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 2020.

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 2021. 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 2020. Every site of 5 or more dwellings listed in the study is assessed on a likely implementation date 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 Housing Delivery Test Action Plan 2021

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 606 per annum<sup>7</sup>. 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 606 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 2021 is shown in Table 15.

**Table 15 Number of dwellings completed, under construction and with outstanding planning permission at 31 March 2021**

	Conversion/ Change of Use	Small sites (less than 0.4ha)	Large sites (0.4ha or greater)	Total dwellings – all sites
Gross Completions (2020-2021)	140	89	427	656
Losses (2020-2021)	8	9	0	17
<b>Net Completions</b>	<b>132</b>	<b>80</b>	<b>427</b>	<b>639</b>
Units under construction	104	217	217	538
Units not started on sites under construction	0	0	0	0
Units with outstanding planning permissions (net)	269	252	787	1,308
Units pending Section 106 agreement (net)*	0	5	160	165
<b>Total units outstanding</b>	<b>373</b>	<b>474</b>	<b>1,164</b>	<b>2,011</b>

(Source: In house monitoring)

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

<sup>7</sup> Requirement with 2020 as the baseline, with trajectory as at 31 March 2020.



**Table 16 Approved and Implemented Residential Development**

<b>Year</b>	<b>Schemes approved in year</b>	<b>Units approved in year</b>	<b>Starts this year</b>	<b>Total under construction</b>
<b>2020-2021</b>	52	242	212	538
<b>2019-2020</b>	63	756	138	982
<b>2018-2019</b>	69	998	270	1092
<b>2017-2018</b>	89	1085	821	1010
<b>2016-2017</b>	54	654	411	476
<b>2015-2016</b>	68	581	381	439

2.28 Table 16 shows the rate of approved residential schemes in Spelthorne since 2015-16. This highlights the Council's rate of approval and also shows the number of units started each year by developers. Starts each year are generally much lower than the number of approvals, indicating that whilst the Council is positively responding to the challenge of boosting its role in housing delivery internally, external factors which are beyond the control of the Council will influence the decision to implement a scheme.

**Table 17 Housing completions (net) by bedroom April 2009-March 2021**

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>
2019-2020	122	98	20	8	248	1	6	11	2	20	121	92	9	6	228	<b>2,557</b>
2020-2021	294	327	30	5	656	0	6	7	4	17	294	321	23	1	639	<b>3,196</b>
<b>2009-2021 (i)</b>	<b>1,286</b>	<b>1,720</b>	<b>480</b>	<b>267</b>	<b>3,753</b>	<b>74</b>	<b>161</b>	<b>260</b>	<b>62</b>	<b>557</b>	<b>1,21</b>	<b>1,559</b>	<b>220</b>	<b>205</b>	<b>3,196</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

2.29 From 2009 to 2021 the average density for all completed schemes was 57 dwellings per hectare. Table 17 shows that there has been a notable increase towards higher density development over the past two years.

**Table 18 Percentage of new dwellings on completed sites between 2009 and 2021 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%
2018-2019	48	459	66	57%	8%	35%
2019-2020	35	230	71	7%	23%	70%
2020-2021	58	513	134	9%	8%	83%
<b>Total</b>	<b>477</b>	<b>3,576</b>	<b>57</b>			

Source: In house monitoring

## Affordable housing

2.30 The overall provision of affordable housing has declined in recent years, however more recently the number of units has risen (Table 18). 211 units are currently under construction. 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.

2.31 Some £4.03m was been received between 2014/15 and 2019/20 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. There are 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 19 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
2019-20	0	0	0	0	0	0	0	0	0
2020-21	177	0	177	22	12	155	88	0	0
<b>Total</b>	<b>838</b>	<b>235</b>	<b>604</b>	<b>513</b>	<b>61%</b>	<b>325</b>	<b>39%</b>	<b>0</b>	<b>0</b>

Source: In house monitoring

**Table 20 Affordable dwellings granted planning permission 2020-2021**

	Number of sites	Total Dwellings (gross)	Affordable dwellings granted pp	Affordable dwellings as % of all dwellings granted pp
All schemes	52	242	0	0%
Schemes above 15 unit threshold as defined in Policy HO3	2	101	0	0%

Source: In house monitoring

2.32 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 2021, seven applications for prior approval were granted, involving the loss of office floorspace with the provision of 102 dwellings, but with no affordable housing (Table 20).

**Table 21 Prior approval applications granted April 2020-March 2021**

Application No	Address	Date Approved	Number of dwellings	Commenced
20/00277/PDR	111B-111C High Street, Staines	21/04/20	4x1 bed flats	March 2021
20/00534/PDO	9-11 Market Square, Staines	07/07/20	4x1 bed flats	
20/00858/PDO	Viewpoint, 240 London Road, Staines	22/09/20	82x1 bed flats	
20/01274/PDO	3 Station Approach, Ashford	17/12/20	6x1 bed flat 2x2 bed flat	March 2021
20/01287/PDR	48 Hetherington Road, Shepperton	05/01/21	1x1 bed flat	
20/01444/PDO	74a High Street, Shepperton	14/01/21	1x1 bed flat	
21/00006/PDO	117 Feltham Road, Ashford	10/02/21	2x2 bed flats	

The Brownfield Land Register

2.33 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.

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

1. at least 0.25 hectares in size or capable of supporting at least five dwellings;
  2. "suitable" for residential development;
  3. the land is "available" for residential development; and
  4. residential development of the land is "achievable".
- 2.35 Spelthorne published its Part 1 Brownfield Register in December 2018 and updates this annually. 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. 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 611 housing units each year over the next 15 years. The Preferred Options consultation (Regulation 18) took place from November 2019 – January 2020. The preferred approach is to provide housing development in a combination of intensifying development of Brownfield land, growth within Staines-upon-Thames and removing limited amount of Green Belt but with additional safeguards to take account of the public's views on loss of Green Belt.
- 2.38 A masterplan is currently being developed for Staines-upon-Thames town centre. This will provide a structure to shape and transform the town centre. The Development Framework is an important element of the new Local Plan as it will set out the opportunities for Staines to deliver new homes, commercial activity and vital infrastructure.

## Information Document 3

### 2 Key challenges

The key challenges set out in the following section have been identified as areas for the Council to overcome and to positively address any current barriers to housing delivery. In addressing these challenges, the Council will seek to maintain its high standards and will not compromise on the quality of housing delivered. In addressing these challenges, the Council will have regard to its corporate priorities and will seek betterment for the community.

COVID-19: the global pandemic and the associated lockdowns, particularly lockdown 1 which took place between March and July 2021, have had a significant impact on the national economy. Whilst the government advised that construction could continue (subject to social distancing being applied) a number of key strategic development sites within the borough stopped work. There has also been an absence of major and minor applications submitted since March 2020 and this will undoubtedly result in a lag in applications, permissions and eventual implementations.

Council imposed Moratorium on Councils schemes in Staines-upon-Thames: In January 2021, the Council made a decision to halt all Council developments in Staines until a development sub committee was in place, the consultation exercise had been undertaken on the Objectives and Options consultation for the Staines Development Framework and a viability exercise had been undertaken for all those schemes. The first two have been completed and the third is underway. Until the Council is satisfied that all these conditions have been met then no Council schemes in Staines can proceed. As Staines-upon-Thames is the Borough's primary town centre, it is a key location for new and sustainable development. Limiting development in this area for a prolonged period is likely to negatively impact housing delivery in Spelthorne.

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 five years has been just 161 units – an average of 32 per year.

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

Notwithstanding the current COVID-19 situation and the impact on the aviation sector, another key issue that will have a significant impact on our community is the possible expansion of Heathrow. There is currently uncertainty as to whether the airport will be expanded and the possible form this will take given the legal challenges and judgments associated with the Airports National Policy Statement (ANPS). If construction does start it 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 2019, the latest records available, the mean income for employees within Spelthorne is £33,700. 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 Local Plan: Preferred Options Consultation took place from November 2019 to January 2020 and the consultation response document has been produced by the Council. 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 the publication Local Plan is anticipated to take place in early 2022.

Evidence base documents are also under production alongside the Local Plan and the Strategic Planning 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. The light rail has also been identified as an Innovation Partner with Heathrow although this work is currently paused due to the COVID-19 pandemic.

## Appendix 4

**Table 22 Housing completions (net) by sector April 2009-March 2020**

Year (Apr-Mar)	Total Dwellings (Gross)				Losses (ii)				Net Completions				Running Total
	Private	RSL	Public	Total	Private	RSL	Public	Total	Private	RSL	Public	Total	
2009-2010	197	99	0	296	29	56	0	85	168	43	0	211	<b>211</b>
2010-2011	116	96	0	212	29	44	0	73	87	52	0	139	<b>350</b>
2011-2012	118	144	0	262	43	60	0	103	75	84	0	159	<b>509</b>
2012-2013	159	63	0	222	32	20	0	52	127	43	0	170	<b>679</b>
2013-2014	154	44	0	198	7	0	0	7	147	44	0	191	<b>870</b>
2014-2015	317	16	0	333	25	43	0	68	292	-27	0	265	<b>1,135</b>
2015-2016	217	138	0	355	33	14	0	47	184	124	0	308	<b>1,443</b>
2016-2017	328	46	0	374	27	0	0	27	301	46	0	347	<b>1,790</b>
2017-2018	278	9	0	287	37	0	0	37	241	9	0	250	<b>2,040</b>
2018-2019	304	6	0	310	21	0	0	21	283	6	0	289	<b>2,329</b>
2019-2020	248	0	0	248	20	0	0	20	228	0	0	228	<b>2,554</b>
2020-2021	479	177	0	656	17	0	0	17	462	177	0	639	<b>3,196</b>
<b>2009-2019(i)</b>	<b>2,915</b>	<b>661</b>	<b>0</b>	<b>3,753</b>	<b>320</b>	<b>237</b>	<b>0</b>	<b>557</b>	<b>2,595</b>	<b>541</b>	<b>0</b>	<b>3,196</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.