

Draft Spelthorne/Runnymede SHMA – Duty to Cooperate Comments and Officer Responses

Authority/Body	Comments	Response
Bracknell Forest	<p>As per our previous letter on the draft SHMA (dated 17 September 2014), we do not consider that the work being undertaken by Runnymede/Spelthorne is likely to have a significant impact upon Bracknell Forest (provided that the SHMA follows the advice set out in the National Planning Practice Guidance - NPPG).</p> <p>However, we have some comments on various aspects of the document which we hope you find of use:</p> <ul style="list-style-type: none"> • Is there any need for the report to refer to the latest mid-year population estimates, or explain why they have not been taken into account (for example timing of study/release date of data). Not clear which data set has been used as reference to both the 2012 and 2013 mid-year estimates. 	<p>Noted.</p> <p>2012 SNPP and household projections have been used to take forward past trends, but starting point for projections have been rebased to the 2013 MYE as this was the latest data at the time of writing the draft SHMA. It must be acknowledged that the SHMA can only be a snapshot in time and would never be completed if continually awaiting or updating for the latest population/ household projections. Paragraph 16 of the PPG note on <i>Housing & Economic Needs Assessments</i> supports this by stating that housing assessments are not rendered outdated every time new projections are issued. However, both authorities realise that an update(s) to the assessment will be required at some point in time, not least to test further economic projections. It is envisaged that it will be at this time that an update or supplementary report will take account of the latest population/ household projections. A further update may also be required prior to the EiPs of both authorities. At the current time however the projections used in the</p>

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	<ul style="list-style-type: none"> <li data-bbox="488 347 1205 515">• Chapter 4: (assessing overall need): Further explanation of the role of the unattributable population change, and the influence that this has on the projections (UPC appears to be negative for both authorities, but projections not adjusted). <li data-bbox="488 994 1205 1193">• Chapter 4: Chapter 2 highlights the inter-relationship between the study area and London. However, it is not clear how the influence of London has been factored into the study. Should separate sensitivity analysis in relation to the interaction with London be undertaken in terms of how this may influence the OAN? <li data-bbox="488 1233 1205 1327">• Chapter 5 (affordable housing): This chapter refers to SHMA guidance from 2007 which was replaced upon publication of the NPPG. Clearer explanation should 	<p data-bbox="1227 282 1664 309">SHMA are still considered robust.</p> <p data-bbox="1227 347 2004 786">The SHMA has run a sensitivity test on the projections for UPC (sensitivity testing being suggested in para 017 of the PPG and looking at UPC being a suggestion in the PAS technical advice note). These are presented in the report but it is GL Hearn’s view that these should not be taken forward into the assessment of OAN. In drawing this conclusion we are mindful of ONS advice on this topic; this includes the observation that it is unclear if UPC is related to the measurement of components of change by ONS and also that if it is (at least in part) due to a measurement error then this is likely to be earlier in the 2001-11 decade due to improvements made by ONS to their migration statistics (i.e. any error would now be quite historic).</p> <p data-bbox="1227 994 1910 1058">Further sensitivity testing will be added based on the London SHMA migration assumptions.</p> <p data-bbox="1227 1233 1910 1260">Noted. Text has been amended to address this point</p> <p data-bbox="1227 1300 2004 1327">The PPG sets out a model for assessing affordable housing</p>

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	<p>be included on the relevance of the 2007 guidance, and be clear that the approach set out in the NPPG has been followed.</p> <p>• Chapter 5: unclear whether the affordable need identified is in addition to the OAN or part of it, and how this influences the overall OAN within the study area (also not clear in main conclusions)</p>	<p>need – this model largely replicates the model set out in previous SHMA guidance (of 2007). The 2007 guide contained more detail about specific aspects of the analysis and so is referred to in this section as appropriate. The analysis is based on secondary data sources. It draws on a number of sources of information including 2011 Census data, demographic projections, house prices/rents and income information.</p> <p>The latest PAS guidance ‘Objectively Assessed Need and Housing Targets Technical Advice Note’ (July 2015) advises on how to derive an OAHN need figure through the SHMA process. However given the recent Satnam decision which suggest a contrary approach there is currently some uncertainty as to how OAHN should be derived especially given that demographic need and affordable need figures are derived differently. Furthermore, an element of the affordable need figure is already incorporated into the demographic projections and as such there is the potential for double counting if the approach to calculating OAHN is amended in the way suggested in this representation. In reality, it is only part of the affordable need figure that will relate to a need for additional dwellings such as for concealed and homeless households, whereas for others in the affordable needs model the need is not for a new dwelling but an alternative size/tenure. The text in this chapter will be amended to make these points clearer. An additional change is also proposed to be made to the affordable needs chapter to include an element of the committed supply of new affordable dwellings in the needs model (as advocated in paragraph 26 of the PPG note on</p>

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	<p>• Chapter 6 (market signals). Not clear whether the full approach set out in the NPPG (2a-019) has been followed. For example there does not appear to be any analysis in relation to land prices. Also has the market signals/affordability uplift been factored into the overall OAN numbers, this is not clear.</p> <p>We welcome the opportunity for on-going discussion relating to the SHMA, and ask to be kept informed of any future consultations.</p>	<p><i>Housing & Economic Development Needs Assessments</i>), as to date neither Spelthorne and Runnymede have provided GL Hearn with this data.</p> <p>'Land prices' are noted to be one of the 6 market signals identified in the PPG. No analysis has been presented on this market signal however as there is a lack of readily available data which spans a notable time frame which relates to this indicator and as such no reliable conclusions could be drawn it is considered reasonable to exclude an analysis of land prices. It is however likely that land prices would be quite high compared to national trends when those involving London (which skew the national figures) are excluded.</p> <p>The market signals/affordability uplift has been factored into the OAN numbers as explained in Section 6 which indicates an additional 57 dwellings per annum on top of demographically derived needs. This is shown in Figure 86 of the draft SHMA.</p> <p>Noted.</p>
Enterprise M3 Local Enterprise Partnership (LEP)	<p>Thank you for consulting Enterprise M3 on the draft Spelthorne and Runnymede SHMA.</p> <p>We have reviewed the draft and wish in particular to comment on your question about whether further work</p>	<p>The draft SHMA uses Experian data to project forward jobs growth, however, past trends suggest that job numbers in</p>

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	<p>is required to understand economic need scenarios. Enterprise M3 is strongly of the view that this work should be undertaken and the outcomes from such work should be used to update the SHMA in due course.</p>	<p>both Spelthorne & Runnymede have fluctuated in the recent past and as such the Experian figures may not be reliable. As such, more work on economic projections is required to understand how these may feed into an economically derived objectively assessed housing need figure. As stated in the draft SHMA, this additional work will be fed into the SHMA as an update or a supplementary report at a later date.</p>
<p>Guildford Borough Council</p>	<p>Thank you for consulting us on your draft SHMA. Our West Surrey SHMA has also been prepared by GL Hearn. This should ensure that the methodology and assumptions are consistent across both studies and will help us understand the extent of housing need across the wider area. This includes the specific way in which GL Hearn have calculated the uplift required in response to market signals, namely looking at the level of housing growth needed in order to improve the household formation rates in younger age groups.</p> <p>In terms of the specific groups in the population that were assessed, we note the list of groups in para 9.3 is missing some of those that are assessed later in the chapter and contained in the summary list in para 9.84, namely students and custom self-build. In addition to these groups, our draft SHMA includes Service families. This group is listed in para 50 of the NPFf so we would recommend that commentary should be included even if only to state its limited relevance.</p> <p>In relation to your question: <i>Where your authority does</i></p>	<p>Noted.</p> <p>Noted. The text will be amended where necessary to ensure consistency between para 9.3, para 9.84 and the text in the body of the chapter which relates to the specific groups analysed.</p> <p>The point regarding service families is noted. Spelthorne & Runnymede do not have large populations of service families but agree that this group should be accounted for in the final SHMA.</p> <p>Amendment made</p>

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	<p><i>not sit within a housing market area adjacent to/overlapping the Spelthorne/Runnymede HMA, it would be helpful if you could indicate whether you still wish to be engaged with the work</i></p> <p><i>Spelthorne/Runnymede are undertaking under the Duty with respect to housing needs and supply (which may at a later date include discussion of housing targets and meeting needs).</i></p> <p>Whilst our draft SHMA (2014) assesses our core housing market area as consisting of Guildford, Waverley and Woking councils, it nevertheless identifies that this area exhibits a complex set of inter-relationships. It goes on to identify that our HMA (predominantly Woking) does share linkages your HMA (namely with Runnymede). As such it will continue to be important for further engagement, under duty to cooperate, to occur between us. We are continuing to prepare our new Local Plan and hope to finalise a new LDS over the summer. We also hope to publish a final version of our West Surrey SHMA, which will incorporate the CLG 2012 household projections, in the coming months.</p>	<p>Agreed that further discussion under the DtC will be required between Spelthorne/Runnymede and the West Surrey HMA, given the links between Woking & Runnymede in particular. This is already indicated in the draft SHMA at paras 2.76-2.77.</p> <p>Runnymede and Spelthorne look forward to engaging with the Authorities in the West Surrey HMA as both groups of Authorities continue with their plan making work.</p>
Hart District Council	<p>Hart DC is grateful for having been consulted on the Runnymede-Spelthorne draft SHMA.</p> <p>Hart is part of the Hart-Rushmoor-Surrey Heath housing market area (HMA); we trust that Runnymede and Spelthorne will accommodate their objectively assessed housing need entirely within the</p>	<p>Noted.</p> <p>Hart's position within a neighbouring HMA is noted. Spelthorne & Runnymede will be making every effort to meet as much of their objectively assessed housing need as possible within the constraints that both authorities face</p>

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	Runnymede-Spelthorne HMA.	<p>and as far as is consistent with the policies in the NPPF.</p> <p>However, if the level of housing need identified for the Spelthorne/Runnymede HMA cannot be met in full by both authorities then an approach to neighbouring HMA areas to request they help with unmet needs is likely. In the first instance this is likely to be with those HMAs with the closest links to Spelthorne/Runnymede, but could also include other neighbouring HMAs such as Hart/Rushmoor/Surrey Heath.</p> <p>This is something which will need to be discussed further under the DtC.</p>
Historic England	Historic England has no comments to make on the above document.	Noted.
Kingston & NE Surrey HMA Group	<p>The Stage 2 SHMA confirms the Housing Market Area from the Stage 1 work undertaken in summer 2014 and sets out housing need figures based on demographic and economic projections. It also sets out the requirement for affordable housing, tenure & size of housing required, and for specific groups of the population.</p> <p>The comments below represent a joint response from officers of the commissioning authorities of the Kingston & North East Surrey SHMA, namely The Royal Borough of Kingston upon Thames, Elmbridge Borough Council, Epsom & Ewell Borough Council and Mole Valley District Council.</p>	<p>Comments noted.</p> <p>Noted.</p>

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	<p data-bbox="488 282 763 309">General Comments</p> <p data-bbox="488 347 1178 547">We are pleased that the consultants have taken on board many of our comments from the Stage 1 study and incorporated them into the Stage 2 study. We believe this will improve the narrative as to how the consultants defined the Housing Market Area as well as addressing some of the wider strategic context.</p> <p data-bbox="488 585 1081 683">Are there any areas of the methodology or assumptions used in the SHMA that you agree/disagree with?</p> <p data-bbox="488 721 1200 1321">We believe that the methodology and assumptions used in the SHMA are generally sound, although we have some concerns surrounding the conclusions in Section 2 relating to the wider London housing market. The consultants, in attempting to validate the Runnymede-Spelthorne HMA, have sought to define other local housing markets in Outer London and Surrey by grouping certain local authorities together. Whilst we appreciate the need to set the wider context in which the Runnymede-Spelthorne HMA sits, we believe that attempting to create a “jigsaw” of local housing markets in this way is unnecessary; especially given the earlier acknowledgement by the consultants that defining HMAs is, to an extent, subjective. For example, we do not agree with the definition of Elmbridge and Epsom and Ewell as a housing market in its own right, given that the two authorities do not share a border as they are bisected by the London</p>	<p data-bbox="1227 347 1317 375">Noted.</p> <p data-bbox="1227 721 2007 1018">Section 2 of the draft SHMA contains an analysis of various data sources such as migration, travel to work areas, house prices etc in order to determine which HMA Spelthorne and Runnymede lie within. This is the same methodology as set out in the Kingston & NE Surrey authorities’ HMA analysis. In order to do this comprehensively the consultants have considered data over a reasonably wide geographic scale as is appropriate and necessary for a study such as a SHMA.</p> <p data-bbox="1227 1056 2002 1321">In analysing the data, the conclusion is drawn that Spelthorne and Runnymede do form an HMA but with a recognition that there are interactions with other areas. The consultants have not attempted to define other HMAs outside of Spelthorne/Runnymede but have loosely defined groupings of authority areas based on the findings of their analysis, including the authorities within the Kingston-NW Surrey group. This is to give an idea of the bigger picture in</p>

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	<p>Borough of Kingston. The detailed evidence from the emerging Kingston and North East Surrey SHMA demonstrates that Elmbridge, Epsom & Ewell and Kingston, together with the other adjoining district, Mole Valley, constitute an HMA.</p> <p>The consultants' definitions of these local housing markets are not supported by evidence and therefore it would be unwise to define them so tightly in this study. A simpler statement examining the broad relationship of Outer London with Surrey and Buckinghamshire would suffice in setting the context for the Runnymede-Spelthorne HMA. Examining the complex interrelationships of all of the other potential local housing markets within the wider London fringe and grouping them with limited analysis should not be within the remit of this study.</p> <p>Are the demographic scenarios of need reasonable?</p> <p>We agree that these scenarios appear reasonable and are based on a robust analysis of the data.</p> <p>Do you agree/disagree that further work is required to understand economic need scenarios?</p>	<p>terms of where the Spelthorne/Runnymede HMA sits in the wider area to assist in identifying who they may need to work with under the DtC. The consultants also make it clear in para 2.79 and 2.87 that they have not considered HMA boundaries in detail beyond Spelthorne/Runnymede and that further work will be required to agree HMA geographies. As such, it is considered that the consultants have not attempted to create a 'jigsaw' of local housing market areas as suggested.</p> <p>In line with the commentary given in the above paragraph, it is considered that the consultants have not attempted to define HMAs outside of Spelthorne/Runnymede and this is indicated in paras 2.79 & 2.87. However, attempting to broadly define where the Spelthorne/Runnymede HMA sits within the wider context is considered to be helpful and within the remit of the SHMA given the introduction of the DtC.</p> <p>Support noted.</p>

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	<p>Whilst further work on economic need scenarios may provide a better understanding of the likely level of employment growth in the area, whether or not it will ultimately lead to a higher level of housing delivery in the area is debatable. Uplift in overall levels of housing need based on economic growth potential is unlikely to lead to on the ground delivery of housing, given the levels of need already identified by the demographically-based projections.</p> <p>Has a reasonable adjustment been made to take account of market signals?</p> <p>We appreciate the need to take account of market signals and make any reasonable adjustments as per the National Planning Policy Framework and Planning Practice Guidance.</p> <p>Adjusting the level of need upwards based on market signals becomes problematic where need is unlikely to be fully met within the Housing Market Area. Even with a level of need based at the lower end of the ranges identified in the SHMA, constraints will inevitably mean that this level of need is unable to be sustainably delivered within the HMA. Runnymede and Spelthorne may then seek to redistribute residual need through the Duty to Cooperate.</p>	<p>Noted, however this is an exercise that RBC and SBC believe needs to be undertaken to ensure that the assessment of the OAN is as accurate and credible as possible.</p> <p>Noted.</p> <p>Noted, however this part of the assessment needs to be undertaken to comply with guidance set out in the NPPF/PPG and to allow for consideration of what the objectively assessed housing need figure is. Further, Spelthorne & Runnymede will be making every effort to meet as much of their objectively assessed housing need as possible within the constraints that both authorities face and as far as is consistent with the policies in the NPPF.</p> <p>However, if the level of housing need identified for the Spelthorne/Runnymede HMA cannot be met in full by both authorities then an approach to neighbouring HMA areas to request they help with unmet needs is likely. In the first</p>

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	<p>Given the demographically-based projections and the likelihood of these being met in full within the Housing Market Area, we do not believe that uplift to the overall levels of need will in fact result in any increase in affordability as this uplift will not be deliverable. The PPG states that plan-makers “should increase planned supply by an amount that, on reasonable assumptions and consistent with the principles of sustainable development, could be expected to improve affordability”. Given the constrained nature of both Runnymede and Spelthorne, it does not appear that increasing the level of need will actually deliver improved affordability as the HMA is unlikely to be able to deliver its objectively assessed need in full even at the lower end of the range prescribed in the SHMA.</p> <p>Have the relevant set of specific groups of the population as set out in the NPPF/PPG been considered?</p> <p>The relevant specific groups of the population have been considered as per the NPPF/PPG.</p>	<p>instance this is likely to be with those HMAs with the closest links to Spelthorne/Runnymede such as the Kingston & NE Surrey HMA group.</p> <p>This is something which will need to be discussed further under the DtC.</p> <p>Noted, but this part of the analysis will be retained in the SHMA so as to ensure that a complete and thorough assessment of the objectively assessed need has been carried out as is required by the NPPF and the PPG note on <i>Housing and Economic Needs Assessments</i>. If, after having made every effort to meet needs in the HMA, Spelthorne/ Runnymede still cannot do so, then a true OAHN figure is required in order to understand the level of unmet need which may be delivered in other HMAs following discussion under the DtC.</p> <p>Noted.</p>
London Borough of Hounslow	Thank you for consulting us on your SHMA Study; it is one of the best we have seen to date.	Support noted.

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London Borough of Richmond upon Thames	<p>Thank you for consulting the London Borough of Richmond upon Thames on the draft SHMA for Runnymede and Spelthorne.</p> <p>This follows the earlier consultation on stage 1 to consider the housing market area. The Council supported the conclusion that Runnymede and Spelthorne is an appropriate HMA, and that Richmond should not be included.</p> <p>It is noted that section 2 continues to note the relationship with centres in Outer London, also picking up our link with Hounslow at paragraph 2.59, and our strong house prices at paragraph 2.68. It notes the inter-connected local housing markets, with the analysis suggesting local markets/quadrants within London including a South West London market including Kingston and Richmond, which the Council also acknowledges we have strong linkages with.</p> <p>The main purpose of the SHMA goes on to assess the housing needs for Runnymede and Spelthorne. It is noted that further work on economic/employment needs is also planned. We do not have any detailed comments to make on the draft SHMA at this time. For information the Council is looking to start scoping our own SHMA work later in 2015. We are happy to continue to engage further and would like to be notified of any future consultations.</p>	<p>Support noted.</p> <p>Noted.</p> <p>Noted.</p>
Reigate & Banstead Borough Council	We concur with the findings of the draft Stage 2 work in respect of Housing Market Areas insofar as this	Comments noted. Runnymede and Spelthorne's Duty to Cooperate Frameworks clarify the Local Authorities and

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	<p>relates to Reigate & Banstead and its own housing market. We note and agree with the analysis which indicates that there is not a significant commuting, migration or housing market relationship between our respective borough's. We therefore do not consider that we need to be closely involved in the work moving forward but would be grateful to be kept informed through existing joint working groups as you finalise the study and progress your housing target.</p> <p>Having reviewed the methodology and assumptions adopted in the SHMA, we are satisfied that the approach taken is reasonable and have no substantive points to raise in this regard.</p>	<p>other bodies that they will seek to engage with on various strategic issues as they progress their local plans.</p> <p>Noted.</p>
Rushmoor BC	<p>Thank you for the opportunity to comment on the Draft Runnymede and Spelthorne SHMA. Rushmoor welcomes the recognition of the Rushmoor, Hart and Surrey Heath Housing Market Area and recognises that the closest links identified, out of the three authorities, are with Surrey Heath. Rushmoor expects Spelthorne and Runnymede Councils to seek to deliver the identified OAHN within their own Housing Market Area. In that respect it is relevant to point out that both Rushmoor and Surrey Heath are constrained in terms of land supply and polices relating to the Birds and Habitats Directive.</p>	<p>Noted. Spelthorne & Runnymede will be making every effort to meet as much of their objectively assessed housing need as possible within the constraints that both authorities face and as far as is consistent with the policies in the NPPF.</p> <p>Whilst the constraints facing Surrey Heath and Rushmoor are recognised, if the level of housing need identified for the Spelthorne/Runnymede HMA cannot be met in full by both authorities then an approach to neighbouring HMA areas to request they help with unmet needs is likely. In the first instance this is likely to be with those HMAs with the closest links to Spelthorne/Runnymede but could also include other neighbouring HMAs such as Hart/Rushmoor/Surrey Heath.</p> <p>This is something which will need to be discussed further</p>

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	<p>Rushmoor raises concerns regarding the way Experian data is used to determine OAHN. The Experian data is limited in its use and in some cases flawed, particularly around employment land supply issues. It is requested that a clearer explanation of the use of Experian data and how it has been discounted is included within the SHMA and that consideration is given to the approach set out in the Hart, Rushmoor and Surrey Heath SHMA of reviewing Experian forecasts in the light of past employment trend data.</p> <p>Rushmoor wishes to continue to be informed of the work Spelthorne and Runnymede are undertaking under the duty to co-operate.</p>	<p>under the DtC.</p> <p>Noted. The draft SHMA does caveat the use of Experian data to determine an economically derived objectively assessed housing need figure. Both Spelthorne and Runnymede are aware that further testing based on more bespoke economic data will be required, which is likely to come through a supplementary report at a later date.</p> <p>Noted.</p>
South Bucks	<p>Thank you for the opportunity to comment on the emerging Spelthorne and Runnymede SHMA and Table of comments received.</p> <p>This response is an officer response to a technical document and has not been formally considered by South Bucks District Council.</p> <p>In relation to the Table of comments I agree with response to South Bucks comments by G L Hearn. These comments include reference to the Buckinghamshire SHMA/FEMA commission with ORS/Atkins to define the SHM and FEM areas affecting the Buckinghamshire authorities. To update you, this commission has now been completed and is</p>	<p>Noted.</p> <p>Noted. Spelthorne & Runnymede are aware of the findings of both the Bucks and the Berks SHMA work and have made joint comments on both. Spelthorne & Runnymede will continue to observe and where appropriate comment on the work and discussions taking place between South Bucks and the Berkshire authorities under the DtC in terms of the definition of an HMA.</p>

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	<p>available on the Council website and essentially defines South Bucks to be within a SHMA and FEMA will all of the Berkshire authorities. As such this means that South Bucks is included within an adjacent SHMA to Spelthorne and Runnymede HMA. The six Berkshire authorities and the Berkshire LEP have commissioned a SHMA, the first part of which is to define the HMA(s) for Berkshire and although this work is not yet complete the emerging position recently consulted on was that there should be two HMAs with South Bucks being included in an Eastern HMA with Slough and Windsor and Maidenhead which if concluded would reach a different position to the Bucks Study. South Bucks has made representations to the Berkshire Study as it is not convinced by the emerging Berks conclusion but is reserving its position until the report and the evidence analysis is completed.</p> <p>In terms of the Spelthorne and Runnymede SHMA there is consistency with the Bucks Study and Berks emerging Study (irrespective of whether the Berkshire Study concludes there should be one or two Berkshire based SHMAs) in that Spelthorne and Runnymede are not in the same SHMA as South Bucks. This position is therefore supported and as such I do not think it necessary for South Bucks to comment on the extent of the Spelthorne and Runnymede SHMA outside of South Bucks/Berkshire or details of the report as this is more a matter for others. However there are two</p>	<p>Noted.</p>

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	<p>general points I would like to make:</p> <p>a) It is suggested that there should aim to be consistency in the methodology, assumptions and analysis/weighting of evidence between the Spelthorne and Runnymede SHMA and the Berkshire Study. This will be assisted by the two studies being undertaken by the same consultant.</p> <p>b) The conclusion that there should be no uplift for affordable housing need is questioned given the level of need both within the HMA and surrounding area. Also has the analysis considered provision of affordable housing in terms of potential support for the local economy and helping to meet business needs?</p> <p>I hope the above comments are helpful.</p>	<p>Noted.</p> <p>The uplift to improve affordability also assumes additional affordable housing. The draft SHMA does make a positive adjustment to improve affordability through the market signals uplift. This is based on evidence which suggests household suppression in the 25-34 demographic. As such, if declining affordability has contributed to a drop in HFRs, particularly in younger age profiles, then an improvement in affordability should manifest in more younger households forming, which is the basis for the market signals uplift.</p> <p>This additional housing will also provide additional affordable housing through increased contributions</p>
Surrey County Council	<p>We have no comments to make on the document other than to welcome the sections on the housing needs of older people and those with disabilities. These include useful data and information that will assist discussions on developing projects to meet accommodation needs.</p>	Noted.
Surrey Heath Borough Council	<p>Thank you for the opportunity to comment on the Draft Stage 2 SHMA. Surrey Heath welcomes the recognition of the Surrey Heath Rushmoor and Hart</p>	<p>Noted. Spelthorne & Runnymede will be making every effort to meet as much of their objectively assessed housing need as possible within the constraints that both</p>

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	<p>Housing Market Area. Spelthorne and Runnymede will need to seek to deliver the OAHN within their own Housing Market Area. Both Surrey Heath and Rushmoor are constrained in terms of land supply and polices relating to the Birds and Habitats Directive and in the case of Surrey Heath Green Belt.</p> <p>Surrey Heath raise concerns regarding use of Experian data to determine an OAHN. This data is limited in its use and in some cases flawed, particularly around employment land supply issues. There will need to be a more clearer explanation in the document regarding the use of Experian and how it has been discounted. There also needs to be consideration of how the HMA will take into account the economic development at DERA and how any needs can be met within the Spelthorne/Runnymede HMA.</p> <p>Surrey Heath considers that the Draft Stage 2 SHMA has recognised the relevant set of specific groups. At this stage Surrey Heath would still wish to be</p>	<p>authorities face and as far as is consistent with the policies in the NPPF.</p> <p>Whilst the constraints facing Surrey Heath and Rushmoor are recognised, if the level of housing need identified for the Spelthorne/Runnymede HMA cannot be met in full by both authorities then an approach to neighbouring HMA areas to request they help with unmet needs is likely. In the first instance this is likely to be with those HMAs with the closest links to Spelthorne/Runnymede but could also include other neighbouring HMAs such as Hart/Rushmoor/Surrey Heath.</p> <p>This is something which will need to be discussed further under the DtC.</p> <p>Noted. The draft SHMA does caveat the use of Experian data to determine an economically derived objectively assessed housing need figure. Both Spelthorne and Runnymede are aware that further testing based on more bespoke economic data will be required, which is likely to come through a supplementary report at a later date. In terms of the economic development at DERA, this is likely to be considered within the bespoke economic data mentioned above, and will also be considered as RBC develops its strategy in its Local Plan which will seek to balance employment and housing needs.</p> <p>Noted.</p>

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	engaged with the work Spelthorne and Runnymede are undertaking under the duty to co-operate.	
Waverley Borough Council	<p>Thank you for inviting Waverley to comment on the above.</p> <p>Waverley has no comments to make on the specific evidence in the SHMA.</p> <p>We look forward to further engagement with you regarding the preparation of your and Runnymede's respective local plans.</p>	<p>Noted.</p> <p>Noted.</p>
Wokingham BC	<p>Wokingham Borough Council's response to the consultation is:</p> <p>a) This Council notes and agrees that there are no strong relationships in terms of commuting, migration and house prices as explained in the draft SHMA (paragraph 2.86) between Runnymede, Spelthorne and Wokingham;</p> <p>b) This Council notes and agrees that the defined HMA does not include Wokingham Borough (Wokingham Borough is within the Reading - M4 West Housing Market area (figure 4 of draft SHMA));</p> <p>c) This Council suggests that the Runnymede and Spelthorne SHMA takes into account the expansion of Heathrow Airport if the Government endorses the Airport Commission's recommendation; and</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>In regard to the possible expansion at Heathrow Airport, although the recommendations of the Davies Commission have been issued, the Government is yet to make a decision on airport expansion (which we are hoping for later this year). Even when a decision on airport expansion has been made by the Government, it will still then be some</p>

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	<p>d) This Council expects Spelthorne and Runnymede Borough Councils through their Local Plans to meet their currently assessed need in the SHMA, as envisaged in paragraph 47 of the NPPF.</p>	<p>time before the impact of any proposed expansion at Heathrow on the nearby boroughs can be properly evidenced and understood. As such for the foreseeable future we will not be able to assess the impact of a possible expansion at Heathrow Airport in the SHMA. Officers accept however that when we are further progressed with the preparation of both Boroughs' Local Plans, if expansion at Heathrow does get approved, our evidence may need refreshing to take account of any evidence produced which quantifies what the impacts for the Runnymede-Spelthorne HMA will be. In such a scenario, both authorities will need to work with Heathrow Airports Ltd and neighbouring authorities under the DtC to understand the impact of expansion, the role that improved public transport could play in labour supply and the effect this could have on housing needs. Additional text will be added to the SHMA to clarify the existing situation.</p> <p>Spelthorne & Runnymede will be making every effort to meet as much of their objectively assessed housing need as possible within the constraints that both authorities face and as far as is consistent with the policies in the NPPF.</p> <p>However, if the level of housing need identified for the Spelthorne/Runnymede HMA cannot be met in full by both authorities then an approach to neighbouring HMA areas to request they help with unmet needs is likely. In the first instance this is likely to be with those HMAs with the closest links to Spelthorne/Runnymede.</p> <p>It is noted that Wokingham is unlikely to lie in a</p>

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		neighbouring HMA to Spelthorne & Runnymede and as such a geographical link may not exist between the two HMA areas. This will need further discussion under the DtC.