

CPRE WOKING.

Woking Core Strategy
Personal representation reference No: 092.

Responses to Inspector's Questions

Matter 1 Question 11

Matter 2 Question 1

Matter 4 Question 19

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Hearing 1: Core Strategy Vision Objectives & Places.
Matter 1. Managing Growth.
20 March 2012.
Personal Representation No: 092 Woking CPRE.

Policy CS1-CS5.

Matter 1: With due regard to its means of production, does the CS provide the most appropriate spatial strategy for sustainable development within the context of the Borough?

Question 11. Does the CS provide sufficient detail on how much development is intended to happen, where and when?

Clarification of the nature of our answer to Q11: We have made representations concerning Woking Borough Council's (WBC) description of the Green Belt (GB) in Policy CS1 and the supporting text.

Question 11 is concerned with Policy CS1 -5 (and not CS6, which is concerned with the Green Belt (GB)). However this question is the nearest "match" to our concerns within Hearing 1, so we feel it is necessary to address the question. Some of what we say here will be repeated in Hearing 2 Matter 2. We do not want unnecessarily to repeat our argument, BUT we are unclear which is the best place to put forward our concerns, so we have included them in both Hearing 1 (Q11) and Hearing 2. (Q1).

WBC's post submission change. We are pleased to see that WBC did take some action to address our concerns in the first of their post submission proposed changes, which adds to Policy CS1 at the last but 3 paragraph, the words "*to meet housing needs between 2022-2027*" and after the last sentence of the Policy adds the words: "*the area of the Green Belt identified in Figure 3 as broad locations of growth, is an area of search from which specific sites will be identified through the review of the Green Belt boundary.*"

What is unsound: However, the proposed changes are insufficient. Policy CS1, as amended, (page 30), para. 3.11 (page 31) and Figure 3 (page 30) state that the GB in Woking Borough is:

- a "*broad locations of growth*"
- or "*broad locations for future direction of growth*"
- or in the case of Figure 3, "*A broad location for growth*".

We believe that these references to growth, in association with the Green Belt, are unsound.

Fail which Test: Policy CS1, paragraph 3.11 and Figure 3 are "unsound" They fail the test of being "justified" as they are not the most appropriate strategy, and also they are not consistent with national policy (PPS2 and PPS3 and PPS12).

Why does it fail: We are very concerned that the wording in parts of Policy CS1, paragraph 3.11 and Figure 3 is still, at the very least, ambiguous, vague and actually misleading and does not conform with PPS2, including the purposes and objectives of the GB. It may be detrimental to the future of the GB as it could well give, at least, an "orange light" or even encouragement, to persons wishing to develop parts of, or sites in, the GB for housing or even commercial purposes. We believe this is totally contrary to what should occur in the GB and to what the Council should be proposing, as their objective number 4 is "*to protect the integrity of the GB*" (page 28), and Policy CS6, which states that the GB "*will be protected from harmful*

development” and “strict control will continue to apply over inappropriate developments as defined ..in PPG2.”

The contested paragraphs actually give misleading detail on where housing development is to be directed, even though a proposed new sentence suggested by WBC (to be inserted on page 30) is helpful (although insufficient), in that the GB is described as an area of search from which specific sites will be identified to meet the housing needs between 2022-2027.

The CS therefore at these parts of Policy CS1 and the justification, do NOT provide sufficient detail (or as we would suggest clarification and safeguards) on where development will go and when.

We are particularly concerned that WBC has still not removed the references on five occasions on pages 29-31 to the phrase “*Broad locations of (or for) growth, or future direction of growth* in connection with the GB .To continually refer to growth and the GB together is contrary to National Policy as well as being ambiguous and misleading.

We see limited justification for WBC to continue with such a generalized approach by including all the Green Belt in this “growth” category. PPS12 at para 4.6 refers to “*the CS may allocate strategic sites*”, thereby suggesting that the recommended approach is not to identify just an undefined, amorphous mass of land, or area such as “the Green Belt”.

We are aware of where the Council has taken the term “broad location of growth” from. It is used in PPS3.

In PPS3, paragraphs 52-55, this term and others are used. HOWEVER, only in para 55 is the term “*broad locations for future growth*” used. In both Para53 and 55 the term used is “broad locations”. We much prefer this latter wording and suggest that it is adopted for this CS.

If the Council continues to consider it correct and beneficial to identify just a broad location, which includes all of the present GB area, then it is vital to separate the term “Green Belt” from the term “growth”. We have already suggested revised improved wording in our original representations which has the desired effect of:

- Removing the word “growth” or “direction of growth”
- Breaking the link between the GB and the words “growth” or “future direction of growth”, which taken together give a completely wrong impression, contrary to Government guidance.
- Still giving the Policy and text clarity of purpose.

How can it be made sound? And what precise changes are sought:

By adopting revised wording as suggested, Policy CS1, reasoned justification, and Figure 3 can be made sound. It is imperative that in the Policy and text the words “growth or “broad locations of growth” are removed from any reference to the overall or broad extent of the G B. Thus the words should be: “*broad locations for the future direction of limited housing development*”.

As an additional clarification we suggest that the word “*limited*” be inserted in the Policy and text, thus providing certainty that any housing is not a substantial or unregulated amount, and also that the word “*only*” be placed before the Council’s proposed new wording of “*to meet housing needs between 2022-2027.*” which makes it clear what the housing is actually for.

We also suggest that a further phrase “*to this end*” should be inserted before “*A review of the Green Belt*”-this is considered beneficial, as it links the meeting of housing needs, at the end of the plan period, with the necessity of reviewing the GB boundaries.

The proposed new sentence suggested by WBC, at the end of the Policy CS1 page 30, also requires amendment. The words “*as broad locations of growth*” should be deleted. The amended sentence now gives a clear impression of the Council’s intentions, but without including misleading words such as “growth,” with the emphasis NOW on the intention to identify an area of search. Also the word “*housing*” should be added between “specific” and “sites” to add clarity to what use the new sites will be put.

Figure 3 (page 30) likewise is misleading and unsound giving the distinct impression that the entire GB is subject to, or available for, future growth; this false impression urgently needs to be corrected. To this end the 3rd line of the key’s wording i.e. “broad location for growth, (that being the full extent of Woking’s GB), should be deleted and replaced with an accurate wording, such as our original suggestion, or, if it is thought preferable to adopt some of the new wording proposed by the Council which is to be placed after the new last sentence of Policy CS1. Thus the amended wording could be “*An Area of search subject to a Green Belt review from which specific sites will be identified to meet housing needs from 2022.*” This may be considered rather long for inclusion in a Key, but it is necessary, to be accurate and clear.

Paragraph 3.11 (page 31) requires similar amendments and deletions so that it conforms to the revised, improved Policy wording. “Growth” and “broad locations” references need to be deleted and replaced with more appropriate wording such as “*limited housing development only...*”

Precise changes proposed (our changes from existing, **in bold**, there are also deletions.)

Policy CS1 (last but 3 paragraph) “*The Green Belt and Woking Town Centre are identified as broad locations for the future direction of **limited housing development**, to meet **only** housing needs between 2022-2027 **and to ensure that the Council’s housing target to 2027 is achieved. To this end** a review of the Green Belt boundary will be carried out to ensure that **limited** releases of Green Belt land for development do not undermine its purpose and integrity*”.

The proposed new sentence suggested by WBC at the end of the policy (page 30) (after some words are deleted) : “*the area of the Green Belt identified in Figure 3 is an area of search from which specific **housing** sites will be identified through the review of the Green Belt boundary*”.

The Key to figure 3 (page 30): “***An Area of search subject to a Green Belt review from which specific sites will be identified to meet housing needs from 2022.***”

Para 3.11 (page 31): (following some words deleted) “*The Green Belt and Woking Town Centre are identified as broad locations for future direction of **limited housing development**, **only** to identify sufficient sites to meet the housing target for the last five years of the period of the Core Strategy.*”

**Hearing 2: Environmental Considerations.
Matter 2: Natural Environment.
21 March 2012.
Personal Representation No: 092 Woking CPRE.**

Does the CS take a justified and effective approach to issues relating to the Green Belt and the natural environment which is consistent with national policy?

C6 Green Belt.

Question 1: Is the Council's approach to Green Belt consistent with the advice of PPG2 What evidence underpins the approach advocated within Policy CS6. Should the GB be an area of potential growth?

We have already stated that we generally support Policy CS6 and WBC's approach, **EXCEPT** for the first sentence of the last paragraph (page 51), where reference is made to the GB being a potential future direction of growth.

We have made representations concerning the Council's treatment of the GB in Policy CS1, the supporting text and Figure 3. We do not believe that references to an area of potential "growth" etc are sound. We consider that they should be deleted and replaced with more appropriate wording fully in accord with PPG2. Our reasoning has been included in Hearing 1 Question 11. We reproduce below some of this as we are putting forward similar arguments for Policy CS6.

What is unsound: We believe that the reference to "a potential future direction of growth," in association with references to the Green Belt is unsound.

Fail which Test: Policy CS6 (page 51, last paragraph is "unsound." It fails the test of being "justified, as it is a not the most appropriate strategy, and also it is not consistent with national policy (PPS2 and PPS3 and PPS12).

Why does it fail?

We accept that evidence suggests that Woking Borough will have to identify some areas of the GB in order to meet housing needs in the latter period of the Plan and to do this a Green Belt review will be required to be undertaken from 2016, in order for sites to be available for development after 2022.

We do not accept that it follows that the GB in Woking should be labelled as a potential direction of growth. This is totally unnecessary and indeed dangerous. We are very concerned that the wording in parts of Policy CS6, is at the very least ambiguous, vague and actually misleading and is at odds with PPS2, including the purposes and objectives of the GB. It may indeed be detrimental to the future of the GB, as it could well give, at least, an "orange light" or even encouragement, to persons wishing to develop parts of, or sites in, the Green Belt for housing or even commercial purposes. We believe this is totally contrary to what should occur in the GB and to what the Council should be proposing, especially as their Objective number 4 is "*to protect the integrity of the GB*".-page 28, and the first part of Policy CS6 states

that the GB “*will be protected from harmful development*” and “*strict control will continue to apply over inappropriate developments as defined ..in PPG2.*”

The contested paragraph actually provides misleading detail on where to and when housing development is to be directed, and ALSO, most worrying, is vague on the actual period of time in which housing need will have be satisfied, in that all the Woking GB is described as a “*potential future direction of growth*” and “*in particular*” the need for housing between 2022-2027.

Policy CS6 therefore at this point does NOT provide sufficient detail (or as we would suggest clarification and safeguards) on where and when development will go.

By using the phrase “*in particular,*” when describing the need for family homes between 2022-2027, WBC has introduced further ambiguity and uncertainty. In policy CS1, it appears to be made clear that any housing development in the GB will only be for housing needs from 2022. However, here in CS6 the wording provides for the possibility that housing needs before 2022 could be allowed within the GB. Thus there is a need for this uncertainty and conflict between the two policies to be corrected and clarified, so that it is absolutely clear that any GB releases will only be for housing from 2022.

We are very concerned that WBC has not amended / removed the reference to “*future direction of growth,* in connection with the Green Belt .To continually refer to growth and the G B together is contrary to National Policy as well as being ambiguous and misleading. We see limited justification for WBC to continue with such a generalized approach and include all the Green Belt in this “growth” category. PPS12 at para 4.6 refers to “*the CS may allocate strategic sites*”, thereby suggesting that the recommended approach is not to identify just a undefined, amorphous, mass of land, or area such as “ all the Green Belt in Woking”.

We are aware of where the Council has taken the term “broad location of growth” from. It is used in PPS3. In PPS3 paras 52-55 the term and others are used. HOWEVER only in para 55 is the words “*future and growth*” used. In both Para 53 and 55 the term used is “*broad locations*”. We much prefer this latter wording and suggest that it could be adopted for this CS. However, the term “*area of search*” is perhaps preferable.

If the Council continues to consider it correct and beneficial to identify just a broad location which includes all of the present G B area, then it is vital to separate the term “Green Belt” from the term “growth”. We have already suggested revised improved wording in our original representations which has the desired effect of:

- Removing the word “growth” or “direction of growth”
- Breaking the link between the reference to Green Belt and the words “*growth*” or “*future direction of growth*” or “*potential future direction of growth*”, which taken together gives a completely wrong impression of what is required or needed and is also contrary to Government guidance .
- Still giving the Policy clarity of purpose.

How can it be made sound? And what precise changes are sought:

By adopting revised wording as suggested, Policy CS6 can be made sound. It is imperative that in the Policy the words “future direction of growth” are removed from any reference to the overall or broad extent of the GB. The suggested phrase should be “*an area of search for future limited housing.*” The word “*only*” is needed to make clear that proposed housing is specifically needed for housing needs in the period for 2022 and not before. The phrase “to

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ensure that the Council's housing target to 2027 is achieved “is required to clarify that the aim is to meet the housing target. The words “*to this end,*” before the reference to the GB review, helps to clarify the link between the need for housing from 2022 and a GB review. The phrase “in particular” must be removed, when referring to the need for family homes and replaced by “*especially the need*” plus a minor rewording, that together remove any ambiguity that exists at present that there could be a need for housing in the GB before 2022.

Precise changes proposed (our actual changes from that existing, in bold)

Policy CS6 (last paragraph.) “*The Green Belt has been identified as **an area of search for limited housing development**, to meet **only housing needs between 2022-2027 and especially the need for family homes in that period and to ensure that the Council's housing target to 2027 is achieved. To this end** a Green Belt review will be carried out in 2016/17 with the specific objective..... ensure that any **limited** release of Green Belt land for development will not undermine its overall purpose and integrity.....”.*

Question 2: Is the planned release of GB for residential development justified by robust evidence and consistent with PPS12 and PPG2? Why is the GB review planned for 2016/17, should this be earlier? Will the CS be effective over the plan period?

We support WBC's approach and timing for a GB review and have no further comments on the Question.

**Hearing 4: Housing.
Matter 7: C12 Affordable Housing.
3 April 2012.
Personal Representation No: 092 Woking CPRE.**

Question 19. To what extent is the CS approach to the total provision of affordable housing justified by the evidence base? How much affordable housing is required and how will it be delivered? Are the thresholds justified? Should the affordable housing target be greater than 35%?

Woking CPRE has made representations on the inadequacy of the target of 35% for affordable housing. (in Policy CS1 and CS12) Also we object to the percentage within CS12 for sites between 5 and 9 new dwellings, where a financial contribution is sought; and the percentage included for sites fewer than five new dwellings.

What is unsound? The reference to 35% is “unsound” in Policy CS12 (page 70) and CS1 (page 29) as is the % figure and total in paragraph 5.82 page 72.

Also the % figure of 10% in the part of Policy CS12, referring to sites providing between 5 and 9 new dwellings (page 70 third bullet point)

And the 10% figure in Policy CS12, referring to sites fewer than 5 new dwelling (page 70 forth bullet point)

Fail which Test? The disputed percentages and totals fail as they are “not justified” as they are not the most appropriate strategy, are not based on robust evidence and are not “effective” as they are not flexible and would not deal with changing circumstances.

Why does it fail?

The Council and all reasonable people recognise that providing sufficient affordable housing is a huge challenge of great importance and priority, which needs to be tackled robustly. Thus it is necessary in this CS to be ambitious and show that it is determined to do everything it can to achieve as much affordable housing as possible.

We recognize that WBC in its defense of the 35% and other percentages, must be realistic and a balance needs to be struck between aspirations and realism. However, we suggest that WBC is being too timid in its approach. The overriding aspect of viability and the need not to stifle housing coming forward is important and is recognized, however this CS needs to have a target that is challenging and indicates that indeed the Council does place affordable housing as its top priority.

It is necessary to recognize that the percentages in Policy CS12 are targets –they should therefore be challenging. In addition this CS is for a period of 15 years and it is very likely that after a period of stagnation the housing market will pick up, housing numbers will increase, prices and land values will increase and the ability for the market to provide more affordable housing will correspondingly increase too.

Others will argue that present economic circumstances are such that even 35% and 10% are much too high-they will affect viability and be “uneconomic”. However, this argument has been used by all developers and landowners whenever affordable housing targets and

thresholds are discussed and higher % figures are being suggested. These arguments have been put forward ever since the first reference in PPG3 to affordable housing was inserted over 20 years ago. We all know the reasons for this, but it should not prevent the responsible Planner or Inspector from being bold and doing all they can to stimulate more affordable housing in any area where it is sorely needed.

Dwelling Completions: The track record of WBC in providing affordable housing is poor. In the 4 years from 2006/07 to 2009/10 1,355 net additional dwellings of all tenures were completed. However, only 157 gross dwellings which were social rented were built (WBC Housing Topic Paper para. 2.8-2.11). Even comparing the net and gross figures the % is only 11.6%. (Additionally 104 homes were purchased under the street purchase scheme.). Even with the later type of housing the total number of affordable houses becoming available is totally inadequate and demand continues to grow year on year.

Waiting Lists: These numbers compare very unfavorably with the future need for 499 new affordable homes per year (WBC Housing Topic Paper para. 5.35). The Council's waiting list is increasing. In June 2010 it was 2,086 households, while the latest figure available for February 2012 is 2,875, a staggering 37.8% increase.

House prices and incomes: House prices are high in Woking. They are between 15%-17% higher than the mean/medium of the South East. (latest ONS figures) and considerably much more than the UK average. Although some people earn higher than average incomes they are not the people who are likely to require affordable housing. Some idea of the incomes of those requiring affordable housing can be gained from income figures for different tenure classes in the WBC Housing Topic Paper. The average income of Council tenants was £11,615,000 in 2010, and for RSLs £26,421.

However the cheapest 1 bedroom property costs £142,000, whilst the cheapest 2 bed property is £214,000. (WBC Housing Topic Paper). For a family a 3 bed dwelling it is £256,000. These prices are far beyond the ordinary Woking resident. Thus more and more households have to forgo buying a property and are forced to consider expensive private renting (if they can) or hope for more affordable housing to be built.

Households in unsuitable accommodation: WBC's SHMA states that 2,234 households are in this situation (5.8% of all households).

Paragraph 9.1 in the SHMA (2009) states "*there is a substantial need for family houses in Woking including a particular need for affordable family homes.*"

So what is WBC's response to this? We consider their response in the CS is inadequate. For a document that looks forward 15 years, the response must be ambitious and challenging. We believe that the overall target in CS1 and CS12 should be increased to 40%.

In the recent past other Plans have adopted a 40% target, so WBC would not be breaking new or untested ground. The last Surrey Structure Plan adopted a 40% figure backed up by evidence which was accepted by the Panel of Inspectors. The South East Plan also adopted a 40% overall figure that was subject to rigorous examination and testing. The Panel and Government accepted the figure as realistic. More recently a nearby Surrey district – Spelthorne Borough has adopted an overall 40 % target figure in their Core Strategy (Policy SP2 and HO3).

The evidence by Adams Integra (2010): The Council has used as support for their figures and percentages the document entitled "Economic Viability Assessment" by Adams Integra. They stand by this report and have adopted in almost all its Key recommendations and the threshold percentages.

However reading the document of over 150 pages it is apparent that its findings are hedged with caveats and assumptions and qualified suggestions. Nothing is absolute.

Viability is an important factor BUT, as the Report makes clear, not the only factor. Indeed at paragraph 4.7.14 (page 82) it states:

“The Council will need to consider the wider issues of need, site supply and the like, alongside our viability findings.”

This we consider a vitally important statement. Housing need in Woking is substantial and increasing, so this view by Adams Integra must be given considerable weight.

We have suggested increases in certain percentages in Policy CS12. WBC has relied completely on what Adams Integra have suggested. However it is apparent that there are possibilities for some increases because for example:

It appears that the Report has based its recommendations on the fact that the developers profit would be at least 17.5% (or even 20%). However, with the need to consider housing need “alongside viability” it could be possible to argue for a slightly lower average for a developer’s profit, of say, 16.5% and that could therefore make a higher threshold percentage possible and achievable, especially on the sites between 5-9 and below 5. Indeed the Study at para 3.9.5 itself states *“We might expect to see some profit expectations below this level (i.e. 17.5 %).*

Assumptions on viability have been considered on a Value Point” of between 3-4. The Study states, at para 4.2.10, that *“the part of the value point range 3-4 can be considered mid range and representative of the typical Woking picture in the current market”.*

However, for parts of Woking the value point is 5 or even above. At 4.2.6 the Study states: *“Areas where average house prices are typically the highest are Horsell, Pyrford, Mayford and Hook Heath”* plus Byfleet.

In this substantial part of the Borough, at the very least, it could be expected that as land prices are high then housing sites coming forward here would have a higher profit margin and can therefore cope with a slightly higher % of affordable housing on certain site sizes.

It has often been argued by developers that smaller sites cannot automatically take a similar % of affordable housing as the larger sites. This is not always necessarily true. The study says at para 3.6.10:

“These results show that scheme size is not a determinate of viability in itself. There is nothing within the appraisal maths which suggests that smaller or larger sites tend to be more or less viable than each other. It really does come down to specifics-the nature of the site etc”.

The recommendations on page 88, para 5.1.5, give support to our proposed percentage increase.

For sites of 5-9 dwellings we have accepted that a figure of 20% be provided ON site, but if a financial contribution is sought, the equivalent of 20% of dwelling to be provided on site should also be required (not the 10% as proposed by WBC) . We see no evidence by Adams Integra for a 10 % figure, so we do not consider that WBC should include it.

Indeed at para 4.6.5 the Viability Study says *“a 20% equivalent proportion would be appropriate as a target for schemes of 1-9 or 5-9”*

In figure 17, page 77 the columns of the Table include a 20% figure for the site size range 5-9 for on site AND a financial contribution.

For the smallest sites we have proposed a 20% figure (and not 10%). This is what the Viability Study also says at para. 4.6.5 (see above).

Additionally, Figure 17, page 77, includes a 10%-20% figure range for the site size of 1-4 dwellings, by way of a financial contribution.

Taken together, we consider that the Economic Viability Study does offer some specific support for our proposed percentage increases and we believe we have demonstrated this by the quotations above.

The two different percentages for sites of 5-9 , that is 20% for on site and only a financial contribution equivalent to the cost to the developer of providing 10% of the number of the dwellings to be affordable on site, appears illogical and without foundation. The two figures will only encourage a developer to opt for the lower “contributions” method, which will ultimately result in less affordable housing being built -the exact opposite to what WBC is advocating.

We also see no validity in WBC advocating only a financial contribution equivalent to the cost of providing 10% on site, on sites of fewer than 5 dwellings. As well as quotations and figures that support a higher figure of 20%, included in the Economic Viability Study-(see above) we suggest that as the Policy already allows off site provision, a method that developers prefer and which is more profitable to them, then a 20% figure be substituted for the present 10%. In our experience smaller sites are not less profitable than sites of between 5-9 dwellings, so why should the former attract a lower percentage?

We consider that Policy CS12 as it stands is not sufficiently flexible and able to respond to an improvement in the housing market which would make a higher % of affordable housing more attractive and easier to achieve. With the higher percentages in place in a revised policy it is possible for it to be more flexible because:

As the percentages are targets, it is possible, in times of economic difficulties, or if a particular site has specific problems that make the percentage in the revised Policy impossible or uneconomic to achieve, then there is the ability to negotiate to a lower figure. Negotiation to a higher figure, or percentage, in reality very rarely happens.

The Viability Study does not appear to offer clear advice on the selection of an overall percentage figure. However it does suggest a 50% figure for sites that are publically owned or are greenfield. Taken together these sites, which can be large, can supply considerable amounts of affordable housing (some way in excess of 50%) and can help to make a Borough wide 40% figure of all housing to be affordable a, realistic proposition and offset the lower % achieved on smaller sites.

It is on the smaller sites that policy CS12 (or the increase as we have suggested) proposes only 20% to be affordable. These sites of 5-9 dwellings and 1-4 dwellings equate to only some 9% each of the total completions between 2004 and 2009. Although this is not substantial, together with the 50% or more being achieved on publically owned large sites and in the future some greenfield sites, we do feel that the 40% overall figure is achievable and realistic.

How can it be made sound and what precise changes are sought?

Policy CS12 and CS1 can be made sound by some wording changes.

- the 35% figure in the first sentence of CS1 and CS12 needs to be replaced with 40%.
- as a consequence the 1,737figure in CS12 is replaced with 1,985 (this corresponds to 40% of the overall Borough housing target.
- in the 3rd bullet point of CS12 the figure of 10% is replaced with 20%.

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- In the 4th bullet point of CS12 the figure of 10% is replaced with 20%.
- In the text, at paragraph 5.82, (page 72), the 35% figure is replaced with 40% and the figure of 1,737 replaced with 1,985.
- Policy SC1 also contains the 35% target which will need to be changed to 40%.

Precise changes proposed (our changes in bold).

Policy CS12 (page 70) “Between 2010 and 2027 the overall target for affordable housing is **40%** of all new home, equivalent to **1,985** new affordable homes”.

3rd bullet point: “On sites providing between 5 and 9 new dwellings, the Council will require 20% of dwellings to be affordable, or a financial contribution equivalent to the cost to the developer of providing **20%** of the number of dwellings to be affordable on site.”

4th bullet point: “On sites providing less than 5 new dwellings, the Council will require a financial contribution equivalent to the cost to the developer of providing **20%** of the number of the dwellings to be affordable on site.”

Text at para 5.82 (page 72): The Council will seek to make provision for a target of **1,985** new affordable units secured on the back of new developments (equivalent to a headline target of **40%**)....”

Policy CS1 (page 29) 2nd line, 1st bullet point: “4964 new additional dwellings with an overall affordable provision target of **40%**”.

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