

Woking Borough Council Affordable Housing Delivery SPD

Consultation Statement

The Affordable Housing Delivery Supplementary Planning Document (SPD) provides detail on how the Council's affordable housing policy, Core Strategy policy CS12, is to be implemented. The first version of the SPD was adopted in 2014, so a thorough revision of the document has been necessary to meet today's circumstances.

Before a Local Planning Authority adopts an SPD, Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires it to publish a statement setting out:

- i. The persons the local planning authority consulted when preparing the Supplementary Planning Document;
- ii. A summary of the main issues raised by those persons; and
- iii. How those issues have been addressed in the Supplementary Planning Document. This statement reflects these requirements.

The Council carried out public consultation on the SPD for a period of four weeks between 21 November and 19 December 2021. A list of persons consulted during that consultation can be found in Appendix 1 [NB: To be produced]. In addition, the consultation was publicised through notices in local newspapers and on the Council's website. Representations made have been considered and the main issues are summarised in Appendix 2. This also includes reference to how the issues raised have been considered and addressed.

The following modifications have been made following the consultation, and are incorporated in the SPD. Underlined text has been added. These modifications enhance the quality of and/or provide updated information to the SPD:

Section 3.1: After the list setting out percentages of dwellings by size, add: "This mix- or any updated equivalent following a revised SHMA/Housing Needs Assessment- will be applied to the totality of affordable housing on any given site excluding First Homes: see 3.5 below."

Section 3.2: Amend the second paragraph to read: "The 2015 SHMA identifies that there is a need for 71% of new affordable dwellings to be in the rented tenure (social and affordable) and 29% at intermediate level (including shared ownership and First Homes). A revised SHMA/Housing Needs Assessment may produce revised tenure mix need figures. National policy requires 25% of new affordable dwellings to be First Homes. Please see section 3.5 for how these proportions will be applied."

Section 3.3: Delete third paragraph.

Section 3.5: Under Keyworkers, in the bullet point 'Priority One', after the first sentence insert: "This includes (but is not limited to) teachers, nurses, NHS workers, police officers, social workers, probation staff and fire fighters."

Section 3.5: Immediately above the table illustrating how the tenure split operates, add the sentence "The tenure mix below reflects the 2015 SHMA; if the tenure mix needs are revised in a new SHMA/Housing Needs Assessment; that new mix should be applied."

Section 3.5: Final paragraph: amend to read: "In Woking, First Homes can make smaller, 1 or 2 bed units, cheaper for purchase and available to more households. The cost of 3 and 4 bed units in the borough prohibits their delivery without a discount of higher than 50%. However, these properties

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are also a much needed type of property for people on the housing waiting list needing social and affordable rented accommodation. The dwelling mix requirements for Affordable Housing, by number of bedrooms, in section 3.1 above, will therefore be applied to the totality of affordable dwellings excluding First Homes on each site."

Section 4.4: Alter the text in Step 1 of the graphic to read: "Open Market Value (OMV) of the relevant or comparative property divided by the Gross Internal Floor Area of that property (both figures to be signed off by a RICS chartered surveyor or RIBA member architect) and multiplied by the affordable housing property size equivalent (using nationally described minimum space standards)"

Section 4.6: Amend the first two paragraphs to read: "Where a viability appraisal successfully shows non-viability of delivering the requirements of CS12, the Council will elect to require an overage clause."

"If so, this will be incorporated into a Section 106 Agreement. It will usually be based on the final revenues (Gross Development Value) of the completed development compared with the Financial Viability Appraisal submitted with the application, taking into account what is generally accepted to be a reasonable developer profit level, having regard to Planning Practice Guidance on viability."

Section 5.1: Amend the third paragraph to remove the text "(as well as Traveller sites)" and "and Traveller". Remove the fourth paragraph and replace with: "The circumstances regarding Traveller sites have not changed in the same way. Such sites will continue to be excluded from requirements for affordable housing provision."

Section 6.3: In third paragraph, amend second bullet point to read: "...or replace it within the Borough, where practicable like for like, and"

Annexe 5 (Nominations agreements): Paragraph 1.11, amend to read: "In any circumstance where the Provider is able to offer a property to someone who is not a nominee of the Borough Council, the Provider will seek to allocate tenancies or sales in the following order, except where requirements attached to Government funding preclude it:"

The Council is satisfied that the Outlook, Amenity, Privacy and Daylight SPD has been prepared in accordance with the Regulations and other relevant statutory procedures.

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Consultation Report Appendix 1: Persons and organisations consulted during consultation

Community

Carers Support Woking
Community Learning Partnership
Horsell Park Neighbourhood Watch/WAN
Just Advocacy
Liaise Women's Centre
Phoenix Cultural Centre
Probation Service
PROWD
Sheerwater Neighbourhood Watch
Surrey Access Forum
Surrey Community Action
Surrey Lifelong Learning Partnership (SLLP)
The Barnsbury Project
The Grove Area LTD
The Lighthouse
The Sheerwater And Maybury Partnership
Westfield Primary School
Woking Association Of Voluntary Service (WAVS)
Woking Cycle Users Group
Woking Youth Arts Centre
Woking Youth Centre
Woodlands Community Group
York Road Project

Business, developers, agents and landowners

AAP Architecture Ltd
Ace Marcelle Hope Limited
ADM Architecture
AMG Planning And Development
AND Consulting
Banner Homes (Wessex) Ltd
Baratt Homes
Barratt Homes (Southern Counties)
Barton Willmore
Basingstoke Canal Authority
Batcheller Thacker
BDB Pitmans LLP
Beaumonde Homes
Bell Cornwell
Bewley Homes
Birchwood Homes
BNP Parabis Real Estate
Boyer Planning Limited
Brimble, Lea And Partners
British Land Properties
Carter Planning Ltd
Castle Wildish Chartered Surveyors
Charles Austen Pumps Ltd

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Charles Church Developments Ltd
Charles Richards
Clarence Country Homes Limited
Clerical Medical Managed Funds Ltd
Clifford Chance Secretaries Limited
Convery Developments Ltd
Cooper Environmental Planning
Courtley Consultants Ltd
Crest Strategic Projects
Croudace
Danks Badnell
Development Planning Partnership
Devine Homes PLC
DHA Architecture
DHS Engineering
DPDS Consulting Group
Drivers Jones
Drivers Jones Deloitte
Fairview New Homes Plc
Form Architecture And Planning
Fromson Construction Co Ltd
Fullerthorne
George Wimpey West London Ltd
Goldcrest Homes
Grant Consultancy
Gravitas 1061 Limited
Greenoak Housing Association
Hammerson UK
Henry Smith
Heritage Architecture
Horsell Businesses' And Traders' Association
Iconic Design
John Ebdon Homes
JSA Architects
Keith Hiley Associates Ltd
Kier Homes Ltd
King Sturge
Knaphill Traders Association
Lacey Simmons
Landmark Information Group Ltd
Lewandowski Architects
Linden Homes South-East Limited
Mantle Panel Ltd
Martin Gardner
Martin Grant Homes
MBH Partnership
McCarthy And Stone
McClosky And Bingham
McLaren Group Limited

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Mercury Planning
Millgate Homes
Montague Alan Ltd
Mount Green Housing Association
N K Accountancy
Nathaniel Lichfield And Partners
National Housing Federation
NULAP (Aviva Investors)
Octagon Developments Ltd
Peacocks Centre
Peter Allan
Pinecrofe Housing Association
Planning Issues And Churchill Retirement
Planware Ltd
PRP Architects
Pyrford Homes Ltd
Quinton Scott Chartered Surveyors And Estate Agents
Rolfe Judd
Rosemary Simmons Memorial Housing Association
Rosetower Ltd
Runnymede Homes Ltd
Rutland Group
Savills
Shanly Homes
Sterling Potfolio Managment On Behalf Of Leylani Ltd
Stonham Housing Association
Surrey Chamber Of Commerce
Terence O'Rourke
Tetlow King Planning
Thames Valley Housing Association
The Landmark Trust
The Lightbox
Thomas Eggar LLP
Welmede Housing Association
Woking And District Trades Council
Woking Chamber
Woking Shopmobility
Wolsey Place Shopping Centre
Woolf Bond Planning
WYG Management Services

Health
Adult Social Care NW Surrey
Health And Safety Executive
NHS
NHS England
NHS England (South)
NHS Guildford And Waverley Clinical Commissioning Group
NHS North West Surrey Comissioning Group
NHS Surrey Heath Clinical Commissioning Group

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North West Surrey CCG
South East Coast Strategic Health Authority
Surrey Health And Wellbeing Board
Virgin Care Limited
Infrastructure, Telecoms & Transport
Abellio Surrey
Affinity Water
AMEC Foster Wheeler
Arriva
Arriva Southern Counties
Avison Young
Carlone Buses
Civil Aviation Authority
Civil Aviation Authority (Safety Regulation Group)
CNS Systems - Navigation, Spectrum And Surveillance
Department For Transport
EE
Entec UK Ltd
Fairoaks Airport Ltd
Freight Transport Association
Guildford Police Station
Highways England
HM Prison Service
Mobile Operators Association
Mobile Operators Association
National Grid
National Grid
National Grid Control Centre
Network Rail
NOMS/ HM Prison Service
Office Of Rail Regulations
Reptons Coaches
Scotia Gas Networks
Scottish And Southern Energy
SGN
Southern Gas Networks
Southwest Trains
St John The Baptist School
Stagecoach South
Surrey And Hampshire Canal Society
Surrey Police
Surrey Police- Estates Department
Thames Water Planning/Property
Thamesway Sustainable Communities Ltd
The Coal Authority
Three
Veolia Water Central
Walden Telecom Ltd
Woking Community Transport Ltd

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Wood E&I Solutions UK Ltd

Wood Plc

Interest groups

Age Concern

Age Concern Woking

Ancient Monuments Society

Campaign To Protect Rural England

Council For British Archaeology

CPRE Surrey

Deafplus

DEFRA

Environment Agency

Forestry Commission

Friends Of The Earth

Friends Of The Elderly

Gay Surrey

Georgian Group

Horsell Common Preservation Society

Irish Community Association

Irish Travellers Movement In Britain

Maybury Sheerwater Partnership Garden Project

National Trust

NFU Office

Surrey And Farming Wildlife Advisory Group

Surrey Archaeological Society

Surrey Campaign to Protect Rural England

Surrey Coalition Of Disabled People

Surrey County Council

Surrey Disabled People's Partnership

Surrey Heathland Project

Surrey Minority Ethnic Forum

Surrey Nature Partnership

Surrey Travellers Community Relations Forum

Surrey Wildlife Trust

Sussex Wildlife Trust

The Bangladesh Cultural Association

The Garden History Society

The Gypsy Council

The Indian Association Of Surrey

The Maybury Centre

The National Trust

The RSPB

The Society For The Protection Of Ancient Buildings

The Twentieth Century Society

The Woodland Trust

Victorian Society

Westfield Common Preservation Society

Woking Mind

Woking Pakistan Muslim Welfare Association

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Woodland Trust

Leisure

Ambassadors Theatre Group

Arts Council For Woking

Link Leisure

Open Spaces Society

Sport England

Sport England South

Surrey County Playing Field Association

The Lawn Tennis Association

The Ramblers

The Rotary Club Of Woking

The Theatres Trust

Tourism South East

Tourism South East

West Byfleet Golf Club

Woking Community Play Association

Woking Ramblers

Woking Sports Council

Local Planning Authorities

Bracknell Forest Council

Elmbridge Borough Council

Epsom And Ewell Borough Council

Guildford Borough Council

Hart District Council

Mole Valley District Council

Reigate And Barnstead Borough Council

Royal Borough Of Windsor And Maidenhead

Runnymede Borough Council

Rushmoor Borough Council

Spelthorne Borough Council

Surrey County Council

Surrey Heath Borough Council

Tandridge District Council

Waverley Borough Council

Wokingham Borough Council

Other

Campaign For Real Ale

Coal Pension Properties

Department For Education

Education Funding Agency

Homes And Communities Agency

National Farmers Union SE Region

National Landlords Association

NATS Ltd

Network Rail

Outline

Scottish Gas Networks

Surrey Playing Fields

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Surrey Police
The Planning Inspectorate
Woking Borough Council
Woking Chamber Of Commerce
Woking FC

Parish Councils

Bisley Parish Council
Chobham Parish Council
Ockham Parish Council
Pirbright Parish Council
Ripley Parish Council
Send Parish Council
West End Parish Council
Wisley Parish Council
Worplesdon Parish Council

Political / Religious groups

All Saint's Church
Church Comissioners
Congregation Of St Mary's Church Byfleet
First Church Of Christ Scientist
Jehovah's Witnesses
Masjid Albirr
New Life Church
Religious Society Of Friends
Shah Jahan Mosque
St Edward Brotherhood
St Mary's Church Office
The Rt Hon Jonathan Lord MP
The Church Of England Guildford Diocesan Board Of Finance
Woking Conservatives
Woking Constituency Labour Party
Woking Liberal Democrats

Residents Associations

Anthony's Residents Association
Brambledown Residents Association
Brookwood Village Association
Byfleet Village Association
Friars Rise Residents Association
Horsell Residents Association
Horsell Residents Association
Maybury Community Association
Pyrford Green Belt Action Group
Sheets Heath Residents Association
St Johns Village Society
Sutton Green Village Hall And Association
Wych Hill Way Residents Association

Young people and Education

Barnsbury Infant School
Beaufort Community Primary School

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Broadmere Community Primary School
Brookwood Primary School
Byfleet Primary School
Goldsworth Primary School
Kingfield School
Knaphill Lower School
Maybury Infant School
New Monument School
Pyrford C Of E (Aided) School
St Dunstan's Roman Catholic Primary School
St Hugh Of Lincoln Catholic Primary School
St John The Baptist R.C Secondary School
St John's Primary School
St Mary's C Of E Priamary School
The Bishop David Brown School
The Hermitage School
The Horsell Village School
The Marist Catholic Primary School
The Oaktree School
The Park School
The Winston Churchill School
West Byfleet Infant School
Westfield Primary School
Wishmore Cross School
Woking College
Woking High School
Woking Scouts
Woking Youth Council

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Consultation Statement Appendix 2. Summary of the main issues raised in consultation, and how they have been considered and addressed

Name of respondent	Comment	Response
Abri	<p>First Homes section acknowledges that a discount higher than 50% will be required to deliver 3- and 4-bed First Homes across Woking, and that 1- and 2-bed homes are much needed for households on the waiting list, but does not provide any further guidance on these points.</p> <p>If the Council were to mandate delivery of First Homes as 1- and 2-bed properties to meet the price cap then this will reduce the number of smaller units available for delivery as affordable homes for rent and other affordable home ownership tenures, further reducing the supply of these for those households on the waiting list.</p>	<p>Insert comment that the dwelling mix requirements for Affordable Housing will apply to the totality of affordable dwellings excluding First Homes on each site.</p>
Abri	<p>Shared ownership housing cross subsidises the provision of affordable homes for rent. First homes will not be able to do this; they are not delivered by RPs so their introduction would reduce the viability of providing affordable housing. There is no requirement for First Homes to remain so in perpetuity.</p> <p>Reconsider whether to include First Homes at all. For example, Bath and North East Somerset Council have demonstrated a negative effect from First Homes, and proposed not to require them from new development.</p>	<p>First Homes are a requirement of national policy. The principle of including First Homes in the SPD does not represent new policy, since it is already national policy. Policy cannot be changed through an SPD.</p> <p>The results of BANES Council's consultation on this subject are not yet known.</p> <p>In addition, elements of the First Homes requirements are expected to apply to a property in perpetuity, except in certain defined circumstances.</p>
Abri	<p>Para 7.3: There should not be a requirement if affordable housing that is lost, to be replaced within the Borough like for like. That goes beyond national policy and would prevent, for example, providing replacement affordable units that are</p>	<p>Agree; insert the words 'where practicable' before 'like for like'.</p>

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	of a type which better reflects modern needs. Should simply restate NPPF.	
Abri	The nominations arrangements set out in Annex 5 do not comply with the Homes England grant conditions for shared ownership homes; Homes England require all such homes benefitting from grant funding to be sold with no local connection or priority conditions, provided the household meets the relevant income / affordability assessments, and this also applies on re-sales. On this basis this wording should be removed from the annex to prevent conflict with Homes England requirements, and unnecessary delays in negotiating S106 Agreements.	Homes England grants are only given for dwellings beyond those required to comply with Policy CS12. The SPD (including Annex 5) exists to aid the interpretation of CS12. Therefore the two issues should not come into conflict. However, in case this should change in future, can add 'except where requirements attached to Government funding preclude it' into the relevant clause in the nominations agreement.
Watkin Jones Group	The Council has provided no evidence or justification as required by the Government to suggest that any BTR proposals would be viable with, or above, 20% affordable housing. The recent draft Town Centre Masterplan noted viability issues with affordable housing on recent town centre developments. Therefore we would strongly suggest that the SPD should be revised to align with the NPPG advice - that 20% would be a suitable 'benchmark' for any BtR scheme, rather than "a minimum" (which should be deleted with supporting evidence). Development viability will be a material consideration in any planning application determination. Indeed this policy would be more appropriate to consider as part of the Local Plan review rather than within an SPD with insufficient or out of date evidence.	The viability of Core Strategy Policy CS12, with a much higher affordable housing threshold, has been tested through two viability assessments. PPG states that 20% is generally a suitable benchmark in <u>any</u> BTR scheme, and does not require local authorities to justify using this figure. The issue of viability on previous Town Centre applications is raised; however, each of those where affordable housing was found not to be viable had specific circumstances which led to that conclusion, and moreover BTR projects could come forward outside the town centre. The proposed guidance makes clear that the minimum threshold of 20% would be subject to all the conditions of Policy CS12, including the potential for non-viability of meeting that threshold to be demonstrated through a viability assessment. It is therefore consistent with the OED definition of 'benchmark': 'a standard or point of reference against which things may be compared or assessed', and also with PPG (BTR section, para 002):

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		<p>“the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark”. Retain current wording.</p>
NHS Surrey Heartlands ICB	We welcome the references to the Woking Housing Strategy 2021-2026.	Support welcomed
NHS Surrey Heartlands ICB	<p>NHS staff are key workers, and so the council should set out in the document that NHS staff will be considered amongst Priority one for First Homes. There are serious housing affordability problems. Our data shows that the number 1 known reason for staff leaving is for relocating out of the area, and in a survey 73% of the Southeast Internationally Recruited Nursing workforce considered access to affordable accommodation a key factor in staying in their organisation. The majority were interested in houses and flats, rather than shared or hospital accommodation. First Homes represent one potential opportunity to support affordable housing delivery in the borough.</p>	<p>Agree that NHS nurses would be considered Priority One keyworkers. After ‘public sector employee who is considered to provide an essential service’, add “This includes (but is not limited to) teachers, nurses, NHS workers, police officers, social workers, probation staff and fire fighters.”</p>
NHS Surrey Heartlands ICB	<p>The ICB would welcome further consultation with the council to consider a wider range of affordable housing tenures which prioritise key workers. For example, a cascade mechanism, where Shared Ownership or other affordable housing properties would have an eligibility criterion to support key workers. Further, it is important to consider options for affordable rental housing options for key workers, given the prevailing unaffordable rents as discussed above.</p>	<p>This question can potentially be considered at the next review of the Housing Strategy.</p>

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NHS Surrey Heartlands ICB	Concern that the delivery of health infrastructure to serve new development should be considered alongside affordable housing at the forefront of the council’s planning priorities, including for planning obligations and CIL spending. Seek to work with the Council to deliver this.	Agree that we will work with the ICB on future priorities for healthcare in the Borough.
Stewart Dick, Byfleet, West Byfleet and Pyrford Residents Association (BWBPRA) and West Byfleet Neighbourhood Forum (WBNF)	Has it been far too easy for developers to persuade Councils that the financial viability of a scheme cannot support the required number of Affordable Housing?	The ability in principle to make this argument is set out in policy CS12. The changes to the SPD should assist with this issue. However, further changes to improve this could include: delete third paragraph of point 3.3, which is no longer considered necessary; amend first paragraph of 4.7 from “may elect to require an overage clause” to “will...” ; in second paragraph of 4.7, replace expected profit level with link to PPG.
BWBPRA / WBNF	To what extent if any have population projections for Woking/Surrey and the impact of the changed working habits as a result of COVID-19 affected the demand/anticipated demand and/or the need for and nature of Affordable Housing?	The Town Centre Housing Market Assessment Update has assessed the influence of recent population projections and COVID-19 working habits with regard to demand for town centre housing, including Affordable Housing. However, it is a good point that further updates to housing evidence may be required. Therefore, where reference is made to SHMA requirements, amend to make clear that these requirements may change when the SHMA is updated.
BWBPRA / WBNF	If every residential development in WBC since 2012, that because of its size had a requirement to build a prescribed number of Affordable Housing, and that requirement had actually been implemented, how many would we have achieved?	Policy CS12 contains within itself an allowance for deviation from the standard AH percentage in certain circumstances. Moreover many dwellings have come forward outside the planning application process (through prior approval).
BWBPRA / WBNF	We are told that as of October 2021 there were a total of 972 applicants on Woking's Housing Register and of those 40% wish a one bedroom unit.	The number of people on the Housing Register is one of the elements which feeds into the

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	<p>What is the relationship between this statistic and the actual demand for Affordable Housing? We are also told that those on universal credit in March 2022 was the lowest since 2020. An up to date figure would be helpful. Also what is the correlation with the demand for Affordable Housing?</p>	<p>calculation of Affordable Housing need.</p>
BWBPR / WBNF	<p>Why has affordable housing been such a low proportion of dwelling completions since 2010, and the target of 35% not met? Is Woking unusual in not meeting its target, or are many other Councils also under delivering to a similar level?</p>	<p>Reasons why this has occurred are set out in the SPD. Woking's affordable housing delivery rate in our plan period (19%) is similar to that of other West Surrey boroughs (between 15% and 22%).</p>
BWBPR / WBNF	<p>Since 2021 it is now a planning policy requirement that a minimum of 25% of all affordable homes secured through developers contribution are to be First Homes. Has this been achieved?</p>	<p>This national policy has not yet been tested in a planning decision in Woking.</p>
BWBPR / WBNF	<p>Paragraph 2.8 Community Infrastructure Levy - CIL will apply to most new buildings, but affordable housing and any development for charitable purposes will be exempt from the charge. Contributions for these will continue to be sought through a Section 106 planning obligation. How?</p>	<p>Section 106 contributions will be negotiated on a case by case basis for each development. For contributions to affordable housing, this will be on the basis of policy CS12 and the remainder of this SPD.</p>
BWBPR / WBNF	<p>We support the policy described in paragraph 3.5 including the decision of WBC not to exercise its discretion but to apply the standard discount and threshold set out in national policy. We also very much support the local connection test; key workers and the tenure split requirements of Policy CS12 being interpreted in the light of the NPPG requirements.</p>	<p>Support welcomed</p>
BWBPR / WBNF	<p>Paragraph 3.6 Affordable Housing provision on Build to Rent schemes also has our support particularly as the Council will encourage Build to Rent applications to provide a higher</p>	<p>WBC retains the services of a firm that reviews (at developers' cost) viability appraisals submitted to us by developers.</p>

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	<p>proportion of affordable housing, whilst treating 20% as the minimum requirement on such schemes.</p> <p>The justification for delivering less than 20% on site on a Build to Rent scheme must be particularly demanding and very much the exception. Does WBC control the selection of who/which firms conduct the valuations?</p>	
BWBPRA / WBNF	<p>Paragraph 4.2 sets out the Council's other affordable housing delivery mechanisms - clearly they have not been successful. Further it is currently unclear as to the future role of Thamesway Housing Limited.</p> <p>However you are to be commended on the many delivery mechanisms listed which going forward really should reduce the shortfall.</p>	Support welcomed.
BWBPRA / WBNF	<p>Congratulations on the Sheerwater regeneration and on the work of the Housing Options team.</p>	Support welcomed.
BWBPRA / WBNF	<p>Historically where off-site compensation has been agreed has this compensation sum been sufficient to build the required number of Affordable Houses? You say that contributions will be ring-fenced - have they not always been ring-fenced?</p>	<p>Any Section 106 financial contribution is ringfenced for a specified purpose (in this case, Affordable Housing) and this has always been the case. Off-site contributions generally do not result in the same economies of scale and efficiency in delivery as on-site provision, which can result in fewer affordable homes being delivered. Nevertheless, it is possible to leverage other funding to maximise the benefits of these contributions.</p>
BWBPRA / WBNF	<p>In Paragraph 4.4 Calculating the Financial Contribution you state that the "Council will usually require financial contributions to be paid on commencement of the development". What are the arrangements to guarantee receipt of funds if this does not happen?</p>	<p>Financial contributions are set out in legal agreements ("Section 106 agreements") when planning permission is granted, so legal action can potentially be taken in the event of a breach.</p>

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BWBPR / WBNF	Paragraph 4.7 - historically how often has overage been required or is this a new requirement for the future? How will the financial audit of the project be undertaken?	Overage clauses are already applied when a developer successfully argues that the delivery of affordable housing is currently not viable for their development. The terms of any viability review covered by an overage clause are set out in Section 106 agreements.
BWBPR / WBNF	Paragraph 5.2: The size thresholds for requiring affordable housing are likely to change. How was the 50% requirement for affordable housing on greenfield sites arrived at? It will almost certainly ensure that the economics of development do not work. This AHDSPD is an opportunity redress this anomaly and how sad that common sense does not prevail	Note the potential for thresholds to change arising from recent proposals made by the Government. However these may not become policy. The 50% requirement on greenfield sites is in the Core Strategy, which has been supported by two viability assessments. An SPD is not able to change Core Strategy policy even if that was thought desirable. On review however, it is not considered feasible to extract affordable housing or contributions from Traveller sites (ref. section 5.1), so these should continue to be excluded as at present.
BWBPR / WBNF	Have the requirements to maintain accommodation as affordable, or for it to be replaced or for resources to be recycled to replace the dwellings, been implemented and enforced?	The Council monitors the delivery of affordable homes through its planning and housing teams to ensure they are delivered in line with Section 106 requirements. There are Government procedures in place where a housing association wishes to dispose of rented homes, which includes notifying the local authority.
BWBPR / WBNF	This is a commendable document. However given the national and local policy context we find the timing of this Paper surprising. Further, given the historic failure to meet Affordable Housing targets we have difficulty being convinced that these refinements to CS12 will be the solution that we are all seeking.	Noted.
Anthony Saunders	The Housing Register states a need for 25% X 2 bed and 33% X 3 bed but the HMA gives this as 30% and 25%. So the need is not being met.	It is true that the need is not being met. However, both of these are different types of need figure, calculated by different methods, and do not reflect delivery.

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Anthony Saunders	CIL is too low to provide the infrastructure required by new development, or perhaps it is not being used for infrastructure.	CIL has to be set at a level which allows for development to be viable, and the current rate is that which was found to meet this requirement when it was introduced. The rate (and viability) will be reviewed in future.
Anthony Saunders	What is to prevent a developer building lots of developments, each just below the size threshold at which affordable housing is required? Should prevent this abuse, for example by requiring affordable housing based on how many dwellings a given developer is developing within a 10 mile radius.	Policy CS12 prevents the subdivision of sites for the purposes of going below the Affordable Housing threshold. However, planning permission is attached to land and not to a particular developer, so applying restrictions to a particular developer across multiple sites is not feasible.
Jeremy Blayney	I have read the draft and fully support the details on how the policy should be applied	Support welcomed
Laurence Keeley	Older peoples' care and accommodation- including affordable- should be in Local Plans.	This sector is encouraged by Core Strategy policy CS13.
Laurence Keeley	Concerned over the impact on mental health of social isolation and overcrowding on new developments.	Agree that this is an important issue. It may be addressed by some of the guidance in our Outlook, Amenity, Privacy and Daylight SPD and the draft Town Centre Masterplan SPD.
Laurence Keeley	Describes problems affecting agriculture. Should provide affordable housing in villages so local people can work on the land.	Dwellings for farm workers are allowed for in the Green Belt in certain circumstances, under Policy DM14: Rural workers' dwellings.
Mike Doyle	The Council is out of touch and out of control, and should check its bank balance.	Noted
National Highways	No comment	Noted
Natural England	No comment	Noted
Historic England	No comment	Noted

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Rushmoor Borough Council	No comment	Noted
Coal Authority	No comment	Noted

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Appendix 2