

PLANNING REF : 261208
PROPERTY ADDRESS : 58 Toutley Road
: Wokingham, Berkshire
: RG41 1QL

be defined as "Affordable Housing Dwellings" under the revised Section 106 amendment.

ERA comments to application 261298 (which apply equally to this Sec 73 Application 261597)

It is our understanding that this application is solely seeking to provide an option to the applicant to develop the site with tenures of 100% affordable homes, rather than the 40% affordable homes approved in planning application 251421, which were subsequently secured through a Sec106 agreement with WBC.

The documentation provided does not suggest there are any other aspects of planning

application 251421 which the applicant is seeking to vary, and our comments are therefore made on that basis.

Whilst we certainly support the provision of affordable housing on this site and made that clear in our submissions to the original application, we do not consider that extending the provision to 100% is compliant with WBC existing policies on provision of affordable housing and for that reason we object to the application.

1) Compliance with WBC Core Strategy

Whilst the WBC Core Strategy addresses affordable housing, we acknowledge that it is now very out of date and does of course predate provisions within the National Planning Policy Framework (NPPF). For that reason, our comments largely relate to the Emerging Local Plan, which has been developed based on the NPPF provisions.

We do however note that the Core Strategy CP5 does include a 50% limit on what WBC can request developers to include as affordable homes. Whilst we acknowledge that this may in part be related to financial viability for land development, we would argue that the core strategy is not specific about this, and the 50% limit could equally be applicable to the viability of mixed, balance, cohesive and sustainable communities. CP2 is clear that applications will only be considered where they "contribute to the provision of sustainable and inclusive communities". This is a theme which carries directly across to the Emerging Local Plan.

For the above reasons we consider that the proposal for 100% affordable homes is not compliant with Core Strategy CP2 and CP5.

2) Compliance with WBC Emerging Local Plan

Local Plan (Policy H1) addresses the requirements for housing mix, and more specifically states "Residential development proposals will contribute to the delivery of sustainable, inclusive and mixed communities". 100% affordable housing does not comply with this policy.

The affordable housing provisions in the Local plan (Policy H3) state that affordable housing should be provided " On-site as part of the development. On strategic developments, affordable housing should be distributed across the development to create a mixed and balanced community " [Emphasis added]. 100% affordable housing does not comply with this policy.

The Local Plan further states " Affordable housing helps to provide mixed and balanced communities, supporting the economy of the borough, and the wider Thames Valley. To provide these communities, affordable housing units should be distributed "tenure blind" around a development site and should not be concentrated in one area, unless there are specific management issues ". 100% affordable housing does not comply with this provision.

Whilst we acknowledge that the Local Plan provides for Exception Sites (under policy H4), where it seems 100% affordable housing provision may be acceptable, it is clear that this is for smaller developments (9 dwellings is mentioned) and we contend this site is certainly not suitable for such exception, in part given the nature of immediately adjoining housing areas and also because of its size.

For the above reasons we consider that the proposal for 100% affordable homes is not compliant with policies in the Emerging Local Plan, in particular Policies H1 & H3. It would fail to meet the overriding Local Plan objectives to deliver sustainable, inclusive and mixed communities, and would be incompatible with the immediately adjoining communities.