



Affordable Housing Supplementary Planning Document

July 2013

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1 Introduction

- 1.1 The Core Strategy details the circumstances of when and where the Council will seek the provision of affordable housing. Policy CP5 of the Core Strategy includes percentages, thresholds and indicative tenure mix for new affordable housing. This Supplementary Planning Document (SPD) is an update to the existing Affordable Housing SPD adopted in 2011 and forms part of the guidance which accompanies the Development Plan and amplifies Core Strategy policies CP5, CP15 and CP16. The SPD provides further guidance of the Council's approach to securing affordable housing through the planning process.
- 1.2 The affordable housing policies build on the National Planning Policy Framework and the Community Infrastructure Levy Regulations 2010 to provide a balanced and fair approach which ensures the creation of inclusive and mixed communities.
- 1.3 The objectives of this SPD are to:
- Facilitate the delivery of affordable housing to meet housing needs
 - Assist in the creation and maintenance of sustainable, inclusive and mixed communities, including the regeneration of poor quality existing housing stock
 - Provide detailed guidance on the interpretation of the requirements in respect of amount, type and size of affordable housing to be provided in accordance with the policies in the Core Strategy
 - Provide certainty to developers about the requirements for affordable housing as part of residential and commercial developments
 - Provide guidance on the approach to payments in-lieu of on-site provision of affordable housing
 - Provide detailed guidance on the calculation of financial contribution in lieu of on-site provision of affordable housing
- 1.4 The Council has duly considered representations received between 4th April and 5pm on 16th May 2013 pursuant to Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The accompanying Statement of Consultation (LPS18) details how issues raised in the representations were to be addressed in the final Supplementary Planning Document (pursuant to Regulation as (a) of the 2012 Regulations). The Council (pursuant to Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004) has determined that a Strategic Environmental Assessment was not required for this SPD.

2 National Planning Guidance

- 2.1 National guidance on affordable housing issues is contained in the National Planning Policy Framework (NPPF) that recognises that a community's need for affordable housing is a material planning consideration.

3 Development Plans and Other Guidance

- 3.1 The Council will take account of the latest affordable housing policy, research and advice available at the time when planning applications are being considered. At November 2012, the Borough's policies/research/strategy on affordable housing are set out in the:
- 3.1.1 Wokingham Borough Core Strategy - Affordable housing provision is addressed in Policy CP5, which accords with Government guidance in the National Planning Policy Framework and is supported by evidence from the Council's Housing Needs Survey and Strategic Housing Market Assessment. This SPD is consistent with the policy requirements in the Core Strategy.
 - 3.1.2 Wokingham Borough Development Plan – Proposed Submission Managing Development Delivery Development Plan Document (MDD DPD) – Housing mix, including Affordable Housing, is addressed in Policy TB05.
 - 3.1.3 Affordable Housing Viability Study - The Affordable Housing Viability Study, undertaken in June 2008 together with an update in March 2009 by Level Ltd, assessed the viability of a range of housing developments across the borough using a residual valuation appraisal tool of the kind recommended in the Government's Delivering Affordable Housing Statement.
 - 3.1.4 Wokingham Borough Housing Strategy 2010-13 sets out the Council's housing priorities for the next 3 years.
 - 3.1.5 Thames Valley West Key Worker Housing Study – study undertaken in 2006 by Atisreal established a local definition of key worker and the current and future housing needs.
 - 3.1.6 Berkshire Strategic Housing Market Assessment – undertaken by DTZ Research and Consulting in 2007 estimated that Wokingham Borough requires between 400 and 550 new affordable housing units per annum.
 - 3.1.7 Housing Needs Assessment report undertaken by DTZ Research and Consulting in 2012, as an update to the 2007 report produced as part of the Berkshire Housing Market Assessment, estimated that Wokingham Borough requires 390 new affordable housing units per annum.
- 3.2 Copies of the above documents are available on the Council website at www.wokingham.gov.uk or available to view at the Council Offices, Shute End, Wokingham.

4 Evidence of Housing Need

- 4.1 The Borough has an extremely high proportion of owner occupation (approximately 80%) and a very low level of Council and Housing Association rented and shared ownership homes (around 8%). Approximately 10% of stock is privately rented (Source: 2011 Census ONS).

- 4.2 The Housing Needs Survey undertaken in 2002 by Opinion Research Services calculated the housing needs of the Borough. Using the Basic Needs Assessment Model from the DETR (2000), the Housing Needs Survey predicted a shortfall of 373 affordable units per annum for the period 2002-2006.
- 4.3 The Berkshire Housing Market Assessment undertaken by DTZ in 2007 provides evidence on the dynamics and drivers of housing markets and included a Housing Needs Assessment report. The Housing Needs Assessment was updated in 2012 by DTZ Research and Consulting. The report estimated that Wokingham Borough requires 390 (gross) new affordable housing units per annum.
- 4.4 A study carried out by Atisreal in 2006 of key workers in the Thames Valley West (covering the administrative areas of Bracknell Forest Borough, Reading Borough, West Berkshire District and Wokingham Borough) found that many public sector organisations reported recruitment problems due to housing-related issues. A quarter of key employers had lost potential recruits due to housing problems, and 92% of employers gave cost of appropriate accommodation as the main reason for this. The study revealed that a minimum of 641 units per annum were needed across the four local authority areas to meet key worker housing need.
- 4.5 The Council's Strategy for Housing for Older People 2008 Refresh sets out the Council's future vision for the provision of specialist older people's housing which includes the need for 380 units of Extra Care Housing (including over 200 for sale units), 160 units of Enhanced Sheltered Housing and 76 units of Dementia Care Housing by 2018.
- 4.6 In order to ascertain the housing need for vulnerable people, a survey of support services was undertaken during 2008. Data was analysed on a total of 217 clients. The greatest housing need is amongst people with a learning disability, which equated to 52% of the responses received. Mental health (18%), physical and sensory disabilities (11%) and care leavers (10%) are the next largest client groups identified to have a housing need.
- 4.7 During 2012 detailed analysis and consultation on the housing needs of young people, including care leavers, was undertaken. Of the 203 consultation responses, 66% require suitable housing within the next 5 years. Furthermore the analysis indicates for an undersupply of supported housing units for young people in the borough.
- 4.8 Demand for affordable housing across the borough exceeds potential supply. As at September 2012, there were 2479 people on Wokingham Borough's Housing Register. There continues to be a low level of homelessness acceptances in the borough, although, in line with other Berkshire areas, there continues to be an increasing number of households seeking advice and assistance in relation to their housing needs.
- 4.9 A stock condition survey carried out in 2010/11 identified that around 25% of the Council's housing stock is of non-traditional build and are designated defective property types due to the potential deterioration of the structure. This impacts on the life expectancy of these properties, with an estimated £200m worth of expenditure required over the next 30 years. The Council is therefore committed to regenerating and improving the condition of its housing stock.

5 Requirement for affordable housing on residential developments

5.1 Core Strategy Policy CP5 indicates that proposals for residential development of 5 or more dwellings (net) or covering a net site area of at least 0.16ha will be required to provide up to 50% of the net additional units proposed as affordable housing, where viable. The Council will negotiate the tenure, size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors. The definition of 'Affordable Housing' included in the National Planning Policy Framework Annex 2 is included at Appendix 1 of this SPD.

5.2 The Council will seek to secure affordable housing to meet local need on residential schemes, using the criteria set out in the adopted Core Strategy (Policy CP5).

Subject to viability, the minimum percentages of affordable housing sought on site by land type and location are:

Land types	Location (CP9)	Size Trigger	%
Previously developed land	Within Major, Modest or Limited Development Locations	5 to 14 dwellings (net) or between 0.16ha and 0.49ha (net)	20
Previously developed land	Within Major Development Location	15 dwellings or more (net) or 0.5ha (net) and larger	30
Previously developed land	Within Modest or Limited Development Location	15 dwellings or more (net) or 0.5ha (net) and larger	40
Greenfield	Within Major Development Location	5 dwellings (net) or more or 0.16ha (net) and larger	35
Greenfield	Within Modest or Limited Development Location	5 dwellings (net) or more or 0.16ha (net) and larger	40
Any	Outside development location	5 dwellings (net) or more or 0.16ha (net) and larger	40
Any	Strategic Development Location (Policies 18-21)	5 dwellings (net) or more or 0.16ha (net) and larger	35

5.3 All garden development will be treated as Greenfield for the purpose of this policy except for the footprint of the existing building(s) in line with the National Planning Policy Framework and Policy TB06 of the MDD DPD¹.

5.4 For the avoidance of doubt, any application for dwellings exceeding the thresholds in policy CP5 (including mobile home and Gypsy and Traveller sites and self-contained² older people's housing, such as extra care housing, assisted living, retirement housing) will need to deliver affordable housing in line with the approach in the Core Strategy.

¹ The MDD DPD and therefore Policy TB06 are currently awaiting formal adoption pending the Inspectors Final Report

² Self-Contained is defined as accommodation having kitchen, living area, bedroom and bathroom available for the exclusive use of its occupants

- 5.5 The definition of which settlements are major, modest or limited development locations is detailed in Appendix 2. The definition of whether a site is green field or previously developed is detailed in Annex 2 of the NPPF.
- 5.6 In line with the NPPF, the Council will take account of whether a commuted sum payment would enable the delivery of better housing outcomes, further details are provided in Section 9.

6 Design, Distribution and Phasing of Affordable Housing

- 6.1 The aim is to create development which is 'tenure blind' to meet the policy requirements of high quality design and sustainable mixed communities.
- 6.2 Developers should have regard to the latest guidance on design as detailed in the Interactive Borough Design Guide Supplementary Planning Document (SPD) 2012, details of which can be accessed on the Planning Guidance pages of the Council's website at www.wokingham.gov.uk
- 6.3 The Council expects for all new housing to have sufficient space to cater for a variety of different household needs with the aim of promoting high standards of liveability, accessibility and comfort. Minimum internal space standards as laid out at Policy TB07 of the MDD DPD are detailed below³:

Policy TB07: Internal Space Standards

1. Proposals for new residential units, including change of use for conversions, should ensure that the internal layout and size are suitable to service the amenity requirements of future occupiers. The Council will assess all development proposals against the following minimum standards to ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers.

1. Three storey houses will require more space to accommodate the additional circulation space required. Proposals for provision of residential units above existing town centre uses will be considered on a site-by site basis.

Dwelling Type*	Minimum gross internal area (GIA) (sq. m)	Designed occupancy (Bed spaces per property)
1 bedroom flat	50	2
2 bedroom flat	61	3
2 bedroom house	83	4
3 bedroom house	87	5
4 bedroom house	100	6

*Five bedroom houses should provide 7 bed spaces and six bedroom houses 8 bed spaces

2. Household accommodation should in general provide two social spaces, such as a living room and a kitchen/dining room. The Council will seek the following minimum combined floor area for these spaces.

³ The MDD DPD and therefore Policy TB07 are currently awaiting formal adoption pending the Inspectors Final Report. Amendments have been made to the text at paragraph 1 of TB07, in line with the Inspectors Preliminary Conclusions (June 2013)

Designed occupancy (Bed spaces per property)	Minimum combined floor area of living, dining and kitchen space (sq. m)
2 person	23
3 person	25
4 person	27
5 person	29
6 person	31

- 6.4 It is anticipated that the affordable homes will be delivered to Homes and Communities Agency Design and Quality Standards and designed to meet the Lifetime Homes Standard. Lifetime Homes incorporates design features which help to make them adaptable to meet the varying needs of different occupiers or changing needs through a family's lifetime occupancy. Details of which can be accessed via

<http://www.lifetimehomes.org.uk/pages/design-criteria.html>

- 6.5 In line with Policy CC04: Sustainable Design and Construction, of the MDD DPD⁴, the Council will be looking to achieve Code for Sustainable Homes Level 4 on all affordable housing (see link below). Developers should refer to the Sustainable Design and Construction SPD, details of which can be accessed via the Council's website.

<http://www.communities.gov.uk/planningandbuilding/sustainability/codesustainablehomes/>

- 6.6 On larger sites the delivery of affordable housing units will normally be phased throughout the housing development and built out in line with private market units or in line with an affordable housing phasing strategy agreed by the Council

7 Types and Sizes of Affordable Homes

- 7.1 To ensure that affordable housing meets the local housing needs within the borough, the type and size of property to be provided in individual schemes will be based on the latest housing needs information from the Housing Register, which will be revisited on an annual basis. All proposals will be considered on a site-by-site basis. As a guide, the Council will aim to achieve the following mix of sizes overall for affordable housing in development proposals:

20% 1 bedroom flats and houses

15% 2 bedroom flats

30% 2 bedroom houses

20% 3 bedroom houses *(to include some 3-bedroom bungalows for families with physical disabilities)*

15% 4 plus bedroom houses

⁴ The MDD DPD and therefore Policy CC04 are currently awaiting formal adoption pending the Inspectors Final Report

8 Tenure Mix for Affordable Housing

- 8.1 Key characteristics of a mixed community are a variety of housing, particularly in terms of tenure and price, and a mix of different households such as families with children, single person households and older people. The Council is planning for a mix of housing on the basis of different types of households that are likely to require housing. This includes having particular regard to the current and future demographic trends and helps to ensure that the plan is sustainable in meeting the housing needs of the community in line with the NPPF (paragraph 50).
- 8.2 The tenure of any affordable housing (whether it is rent, shared ownership, intermediate rent or affordable rent) is to be agreed with the Council on a site-by-site basis, having regard to housing need, site specifics and other factors. Affordable housing provision will include a mix of social rent, affordable rent and shared ownership housing. Based on needs evidence, Affordable Rent should not typically account for more than 12% of the Affordable Housing.
- 8.3 Housing for people with special needs will be an element included in the overall amount of affordable housing being negotiated. Such housing would include extra care housing for older people, supported housing (homes in which vulnerable residents are offered a range of housing related support services to enable them to live independently), accessible housing (homes designed to allow easier access for physically disabled or vision impaired persons) and fully wheelchair accessible housing (homes that let a person using a wheelchair move around without interference and with access to all the features of the home). This will be negotiated on a site by site basis according to identified need.
- 8.4 In line with the NPPF, the Council wishes to ensure that any shared ownership housing delivered within the scheme is genuinely affordable to local residents having regard to house prices and incomes in the Borough. Typically, the Council will expect shared ownership units to be delivered with 35% initial equity shares available to purchase and a maximum rent on unsold equity of 1.5% per annum, with the options to “staircase” to 100% over time. This will ensure that the average household on the shared ownership waiting list can afford (within 25-30%) of their income to purchase a share in the average house in Wokingham Borough.

9 Delivering Affordable Housing and Financial Considerations

- 9.1 The provision of affordable housing will normally be achieved through either the involvement of a Registered Provider (RP) nominated by the Council and registered with the Homes and Communities Agency (or its successor), the Council or through the Council’s Local Housing Company (Wokingham Housing Limited), so that properties can be secured for successive occupiers. Appendix 3 sets out our current list of RP partners. Normally, the Council would expect the freehold interest in the affordable housing to be transferred to the Registered Provider, the Council or Wokingham Housing Limited. Where the transfer is a leasehold arrangement, the lease will be for a minimum of 125-years (99-years in exceptional circumstances) and the land rent will be restricted to a peppercorn charge.

- 9.2 It is assumed that affordable housing will be delivered without recourse to public subsidy. This model has been fully and rigorously tested by Levvel's during the production of the Affordable Housing Viability Study.
- 9.3 In line with the NPPF, the Council will take into account whether a commuted sum payment would enable the delivery of better housing outcomes than would have been provided on-site or to facilitate progression of strategic housing objectives, such as learning disability housing, dementia housing (or other vulnerable persons housing) and including regeneration projects. Paragraph 4.9 demonstrates the urgent need for this.
- 9.4 Developers will be invited to put forward proposals, for both on-site and in-lieu provision, for consideration by the Council. These will be subject to negotiation and agreement, on a site-by-site basis, between the Council and applicant.
- 9.5 In circumstances where the Council and the developer applicant agree that a commuted sum payment is appropriate, it will be necessary to establish the value of the commuted sum payment. In accordance with national guidance any commuted sum payment should be of broadly equivalent value to the cost to the applicant of on-site provision. Valuations, where necessary, will be undertaken by an independent valuer, paid for by the applicant and instructed by the Council.
- 9.6 The methodology for calculating an in lieu payment is based on the difference in the residual development value of a scheme without on-site affordable housing and the same scheme with on-site affordable housing. Further details, including a template for the calculation, can be found in the Levvel's Affordable Housing Viability Study Report (Chapter 13) as per attached summary at Appendix 4.
- 9.7 It is recognised that in particular for sites, above the 0.16ha threshold, with a small number of units (i.e. 2–4) there may be difficulty in providing on-site provision. The Council will consider an in lieu payment based on the appropriate percentage for the development location/land type and based on the number of bedrooms being provided on site.
- 9.8 The timing of payment of a commuted sum will normally be at commencement of development. However, in some circumstances a payment schedule may be agreed with the Council.
- 9.9 The Council will seek to make the most effective use of any commuted sums received, taking into account the availability of suitable opportunities at the time commuted sums become available. A list of potential spending options, whilst not exhaustive, and may change over time, depending on needs and opportunities, is included at Appendix 5.
- 9.10 Where funds are used to promote the release of existing homes for rent or provided as grant to Registered Providers or Wokingham Housing Limited to acquire or develop homes for rent or affordable home ownership, the Council will receive nomination rights, which will be negotiated on a scheme by scheme basis.
- 9.11 Any costs associated with negotiating a commuted sum, including the cost of site/property valuations, should be met by the developer. Any housing scheme using commuted sums will be self funding from the commuted sums account,

contributions from partner Register Provider' or Wokingham Housing Limited own borrowings or reserves.

- 9.12 The Council will consider, on a case by case basis, approaches from developers where a scheme already has planning consent and a signed s106 agreement in place.
- 9.13 If an Applicant for planning permission has a robust viability case for a provision below that in policy CP5 of the Core Strategy, an open book appraisal of development of the development finances, which demonstrates that the proposal is clearly not viable without a lesser affordable housing provision and/or public subsidy as explained in paragraph 4.33 of the Core Strategy should be submitted with their planning application. The applicant should also consider different tenure mixes. The viability evidence will be considered by the Planning Officer and independent advice may be taken (the applicant will be expected to meet the Council's cost for independent consideration of a viability case).
- 9.14 To ensure adequate affordable housing is provided in small communities, notwithstanding the lower threshold, the Council considers it necessary to allow for rural exceptions. Further guidance on where affordable housing may be permitted as an exception to usual planning policy is set out in policy CP9 of the Core Strategy.

10 Requirement for affordable housing contributions on commercial developments

- 10.1 The Atisreal study - Thames Valley West Key Worker Study 2006 - indicated that there are a considerable number of workers unable to afford property in the Borough. Commercial development results in more jobs being created, which in turn increases the demand for housing in the area. The Council will therefore seek a contribution towards the provision of affordable housing from employment development (business, industry and warehousing or B class uses), as supported by policies CP15 and CP16 of the Core Strategy.
- 10.2 As an indicative guideline a report produced by Roger Tym & Partners in 2010 suggested a contribution of £50-£100 per m² across all employment development (B class uses) should be viable. The actual level of charge will be negotiated on a site by site basis by the Planning Officer being informed by the overall level of contribution and the effect on viability.

11 Rural Exception Sites

- 11.1 Many rural areas face particular difficulties in securing an adequate supply of land for affordable housing for local needs. NPPF states that 'local planning authorities should be responsive to local needs, particularly for affordable housing, including through rural exception sites where appropriate'. The delivery of rural exception sites for affordable housing can be a complex issue for Parish Councils, landowners and the community.
- 11.2 In response to this, the Council has included a policy in the Core Strategy that it will allow sites to be brought forward for affordable housing to meet local needs in rural

areas as an exception. The circumstances when the Council will allow a site to be brought forward as a rural exception are set out in Core Strategy policy CP9.

- 11.3 For the purpose of rural exception sites, local need is defined as identified needs in the individual village or local area it serves, defined as the parish boundary. Therefore, before the Council will grant planning permission for affordable housing on a rural exception site, it must be satisfied that there is a genuine need for affordable housing in the locality. To establish that a genuine need exists the Council will require evidence from a Parish level Housing Needs Survey that is sufficiently recent to provide a reliable evidence base. Only after the Council is satisfied that a genuine local need exists will it consider the suitability of a site as a location for a rural exception site.
- 11.4 The number of affordable homes provided on a rural exception site should not be greater than the level of local need identified.
- 11.5 The housing mix and tenure split of affordable housing on rural exception sites will be determined by the particular local need identified in the village or local area it serves as defined above. As for all affordable housing, rental levels or shared ownership costs should be affordable to future tenants.
- 11.6 Affordable housing on rural exception sites should be provided in perpetuity, the Council will expect this to be secured through legal agreement, which will ensure that the affordable housing scheme remains available to those in local need and at an affordable rate initially and in perpetuity, and is managed appropriately.
- 11.7 A proportion of market housing may be appropriate only where it can be demonstrated to the Council that the market housing is essential to cross-subsidise the delivery of the affordable housing and that the development would not be viable without cross-subsidy. The number of market houses can never exceed the number of affordable and the plot size, scale and general design of the homes should be comparable regardless of tenure within a single integrated development layout.

12 Affordable Housing Legal Agreement

- 12.1 Applicants or their Agents will be required to enter into a legal agreement with the Council to safeguard provision of affordable housing and, where necessary, control its occupation. Example model clauses are included at Appendix 6.

Appendix 1

NPPF Extract of Glossary

The following is an extract taken from Annex 2 of the NPPF:

Affordable Housing: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental agreements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate affordable housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.

Appendix 2

Development Locations

Major Development Locations are:

Earley
Green Park
Shinfield (N of M4)
Twyford
Winnersh
Wokingham
Woodley

Modest Development Locations are:

Arborfield Garrison (subject to statement at paragraph 4.53 of the Core Strategy)
Pinewood (Crowthorne)
Finchampstead North
Ruscombe
Shinfield (subject to statement at paragraph 4.53 of Core Strategy)
Spencers Wood (subject to statement at paragraph 4.53 of Core Strategy)
Three Mile Cross (subject to statement at paragraph 4.53 of Core Strategy)
Wargrave

Limited Development Locations are:

Arborfield Cross
Barkham Hill
Charvil
Finchampstead
Hurst
Riseley
Sindlesham
Sonning
Swallowfield

Strategic Development Locations are:

Arborfield Garrison - see
<http://www.wokingham.gov.uk/planningcontrol/planning/masterplanning/sdls/arborfieldgarrisonsdl/>
South of the M4 (Junction 11) – see
<http://www.wokingham.gov.uk/planningcontrol/planning/masterplanning/sdls/southofthem4sd/>
North Wokingham – see
<http://www.wokingham.gov.uk/planningcontrol/planning/masterplanning/sdls/northwokinghamsdl/>

South Wokingham – see

<http://www.wokingham.gov.uk/planningcontrol/planning/masterplanning/sdls/southwokinghamsdl/>

Also please refer to the Infrastructure & Delivery SPD:

<http://www.wokingham.gov.uk/planningcontrol/planning/masterplanning/sdls/infrastructurespdl/>

Appendix 3

Local Housing Company & Current Registered Provider Partners

Wokingham Borough Council has a Local Housing Company, currently known as Wokingham Housing Limited and a joint commissioning arrangement with four Registered Providers (RPs). These partners are listed below:

Wokingham Housing Limited

Catalyst Housing Limited

Thames Valley Housing

Sovereign Housing Association Limited

Housing Solutions Limited

Affordable housing may also be transferred to the Council

(Please note this appendix will be updated as and when required. Current lists and contact details can be obtained from the Community Infrastructure Team)

Appendix 4

Calculation of In Lieu Payments for Affordable Housing

Developer subsidy relates to the implications for the land use of a particular site. The developer subsidy is established by looking at the difference in residual land value between the development without an encumbrance (in this case the encumbrance is the imposition of affordable housing) and the residual land value with the encumbrance. The simple formula for developer subsidy is thus:

$$\begin{aligned} &\text{DEVELOPER SUBSIDY FOR AFFORDABLE HOUSING} \\ &= \\ &\text{RESIDUAL VALUE OF DEVELOPMENT UNENCUMBERED BY AFFORDABLE} \\ &\quad \text{HOUSING} \\ &\quad \text{LESS} \\ &\text{RESIDUAL VALUE OF DEVELOPMENT ENCUMBERED BY AFFORDABLE} \\ &\text{HOUSING (TAKING INTO ACCOUNT ANY REALISTICALLY ACHIEVABLE} \\ &\quad \text{ESTABLISHED ALTERNATIVE OR EXISTING USE)}^5 \end{aligned}$$

Thus the formula involves two discrete calculations and we would suggest a simple matrix that enables these two calculations to be assessed. This is as follows with example figures input⁶

Scheme	A 100% Market	B Mixed Scheme (Affordable & Market)
Gross Development Value (GDV)	£10,000,000	£6,500,000
Values/Receipts		£2,000,000
Grant Provided		Nil
Total Build Costs	£4,750,000	£4,750,000
Total On Costs	£475,000	£475,000
Total Other s106 Costs	£100,000	£100,000
Total Sales Costs	£650,000	£450,000
Total Finance Costs	£1,000,000	£700,000
Total Acquisition Costs	£100,000	£70,000
Developer Profit @ 17% GDV	£1,700,00	£1,225,000
Residual (Values/Receipts Less Costs)	£1,225,000	£730,000
Developer Subsidy Required (A-B)	£495,000	

⁵ Any realistically achievable alternative use must accord with the approach of the Development Plan

⁶ Please note that these figures are for illustrative purposes only

Appendix 5

Use of Commuted Sums

The following list of potential spending options is not exhaustive, and may change over time, depending on needs and opportunities.

Several of these options are not dependent on land availability.

- Fund regeneration of existing Council affordable housing in the borough
- Fund a Registered Provider or Wokingham Housing Limited (a Council owned company) to purchase properties on the open market for social, affordable, intermediate rent or for affordable home ownership options
- Fund a Wokingham Borough specific Equity Loan Scheme
- Fund purchase of land for development by a Registered Provider or Wokingham Housing Limited
- Make grant contributions to a Registered Provider or Wokingham Housing Limited towards site development and/or construction costs on land already owned by the Council or Registered Provider - to bring forward development and/or improve tenure mix and enhance affordability for rental and affordable home ownership options
- Create Tenants Incentive Schemes and other opportunities to promote targeted voids in existing Council stock, for re-letting to families (thus creating a cascade of voids in smaller units).
- Fund a Registered Provider or Wokingham Housing Limited to purchase suitable completed new build units 'off the shelf' from a developer for rental / affordable home ownership

Where funds are used to promote the release of existing homes for rent or provided as grant to Registered Providers or Wokingham Housing Limited to acquire or develop homes for rent or affordable home ownership, the Council will receive nomination rights, which will be negotiated on a scheme by scheme basis.

Any costs associated with negotiating a commuted sum, including the cost of site/property valuations will be met by the commuted sums account, or the developer directly. Any housing scheme using commuted sums will be self funding from the commuted sums account, contributions from partner Registered Providers' or Wokingham Housing Limited own borrowings or reserves.

Note:

For the purposes of this appendix:

The term 'affordable housing' includes social rented, affordable rented and intermediate rented housing

The term 'affordable home ownership' is the generic description for a range of equity sharing tenures – including shared ownership, equity loans and self-build - intended to make home ownership more accessible to people whose income and financial circumstances preclude them from outright purchase on the open market.

Appendix 6

Example Legal Agreement

Definitions and Interpretation Relating to Affordable Housing

“Act”	the Town and Country Planning Act 1990, as amended
“Affordable Housing”	housing of different tenures provided with subsidy support for people who are unable to resolve their needs in the private housing market because of the relationship between local housing cost and their incomes such housing being provided for in conformity with the advice contained in the National Planning Policy Framework published by the Department for Communities and Local Government
“Affordable Housing Contribution”	Shall mean a contribution of £[] index-linked towards the off-site provision or regeneration of Affordable Housing within the Council's administrative area in lieu of provision of []% of Affordable Housing Dwellings on the Application Site
“Affordable Housing Dwellings”	shall mean % of the number of Dwellings for use as Affordable Housing consisting of a mix of Social Rented Housing Affordable Rented Housing Shared Ownership Housing which shall be built in compliance with the Standards (the exact size and mix of which are to be specified here)
“Affordable Housing Land”	that part of the Site upon which the Affordable Housing Dwellings are to be constructed the exact position of which is to be nominated by the Owner and reasonably agreed by the Council on or before the approval of the Reserved Matters application
“Affordable Housing Mortgagee”	Means any mortgagee of a Registered Provider in possession of any or all of the Affordable Housing Dwellings or a bona-fide purchaser for value thereof from such mortgagee in possession (except in the case of a purchaser from a mortgagee in possession which is a Registered Provider or the successors in title of such a purchaser)
“Affordable Rented Housing”	shall mean rented housing provided by Registered Providers at up to a maximum of 80% of local market rents (inclusive of service charges, where applicable)
“Index”	the Index of Retail Prices (all items) published by the Office for National Statistics or any other reference base used to compile the Retail Prices Index (all items) as shall

	be published by the Office for National Statistics or its successor in function
“Index-Linked”	the sum of money shall be increased by the percentage by which the Index has increased between and the date the sum is paid
“Local Housing Company”	shall mean the Council owned company currently known as Wokingham Housing Limited
“Mortgagee in Possession”	Means the Mortgagee (or any successor) of the Mortgagee where the Mortgagee takes possession of any part of the Application Site except any of the Affordable Housing Dwellings
“Mortgagee Sale Provisions”	Means the provisions set out in Part 2 of Schedule [] of this Deed
“Nominations Agreement”	An agreement substantially in the form of the draft nominations agreement annexed hereto by which the Council may nominate tenants for the Affordable Housing Dwellings
“Occupation” and “Occupied”	means personal residential occupation of a Dwelling by an individual or individuals in right of an interest in the Dwelling purchased or rented by that individual or individuals
“Open Market Dwellings”	shall mean and Dwellings which are not designated as Affordable Housing Dwellings
“Owners”	the First Owner the Second Owner the Third Owner and shall include any successors in title to any of the parties comprised within the definition of the Owners
“Plan”	the plan attached to this Agreement
“Planning Application”	the planning application made under reference for the Development
“Planning Permission”	the planning permission granted pursuant to the Planning Application and shall include any subsequent permissions under Section 73 of the Act permitting the carrying out of the Development
“Preferred Registered Provider”	shall mean the Local Housing Company, the Council or any one of the following Registered Providers or their respective successors and permitted assigns each of whom is a Registered Provider within the meaning of the Housing & Regeneration Act 2008 or any statutory

modification thereto:

- i Catalyst Housing Group
- ii Thames Valley Housing Association
- iii Sovereign Housing Association
- iv Housing Solutions

“Registered Provider” or “RP”

shall mean either:

- (1) a registered provider within the meaning of the Housing & Regeneration Act 2008 or any statutory modifications made thereto; or
- (2) the Local Housing Company; or
- (3) The Council

“Shared Ownership Housing”

shall mean housing provided by a Registered Provider Local Housing Company or Council where the occupier will initial be offered an equity share in the property of 35% (with an option of purchasing a greater share either initially or subsequently should the occupier so wish) and pays a maximum rent of 1.5% per annum on the value of the unsold equity

“Site”

the land known as _____ and shown for identification purposes only edged red on the Plan

“Social Rented Housing”

shall mean housing provided by a Registered Provider Local Housing Company or Council at target social rents

“Standards”

means the Homes and Communities Agency Design and Quality Standards and Lifetime Homes Standards current at the date of the Planning Permission

“Transfer”

means transfer of the ownership of any part of the Site and includes appropriation where at the time of any intended transfer to the Council the land concerned is vested in the Wokingham Borough Council

Model Section 106 Clauses

The Owner covenants with the Council as follows:

1. Not to commence construction of any Open Market Dwellings [in a phase] unless and until the precise Affordable Housing number, location and mix [for that phase] has been approved in writing by the Council
2. Not to Commence Development until it has submitted to the Council the name of the chosen Preferred Registered Provider
3. Not to commence construction of the Affordable Housing Dwellings [in a phase] any later than 3 calendar months after the commencement of construction of the Open Market Dwellings [in that phase]
4. To construct the Affordable Housing Dwellings and make the same ready for Occupation in accordance with the Standards to the reasonable satisfaction of the Council as part of the Development upon the Site at no cost to the Council prior to the use or Occupation of more that forty per cent (40%) of the Open Market Dwellings

5. Not to permit more than fifty per cent (50%) of the Open Market Dwellings [in any phase] to be used or Occupied unless and until all of the Affordable Housing [in that phase] has been completed and either the freehold ownership or (in the case of a flat) a minimum 125 year lease has been transferred/granted to a Preferred Registered provider or other Registered Provider approved in writing by the Council on the terms set out in Part 2 of this Schedule

PART 2

Terms of Offer

The Affordable Housing Dwellings shall be transferred

- 1.1 with vacant possession
- 1.2 subject to any easements wayleaves and rights over on and under and any other matters to which the Owners title is subject in relation to the Affordable Housing Dwellings as may exist at the date of the offer
- 1.3 free from any charge or other encumbrances which would prevent the same from being used for the development and the subsequent use of then as Affordable Housing
- 1.4 with full title guarantee and
- 1.5 cleared of debris and building materials
- 1.6 with all necessary rights of access and services

Price

- 2 The price of the Affordable Housing Land shall be an amount calculated to enable the Preferred Registered Provider to acquire the Affordable Housing Dwellings without the need for public subsidy

Costs

3. Each party shall bear its own costs of negotiation and exchange of contracts

Rights

4. The provisions of Schedule 1 Part 2 shall apply to the transfer of any Affordable Housing Dwelling

Exchange of Contracts

5. Following the written acceptance of an offer by the Preferred Registered Provider the Affordable Housing Dwellings shall be exchanged between the two parties within 56 days following such written acceptance (or such longer period as may be required by the Preferred Registered Provider but in any event not exceeding 90 days)

Occupation of the Affordable Housing Dwellings

6. The Affordable Housing Dwellings shall not be used for any purpose other than as Affordable Housing and within 8 weeks of the transfer of the Affordable Housing Dwellings [within a phase] to the Preferred Registered Provider the Owner shall procure the execution by the Preferred Registered Provider of the Nominations Agreement and deliver the same to the Council.

Affordable Housing Mortgagee Sale Provision

- 7 An Affordable Housing Mortgagee wishing to exercise any power of sale or leasing shall make every reasonable effort over a period of three months from the date the

Council is notified in writing of such wish to dispose of the land in question to a Registered Provider at either its then Market Value (subject to any leases or tenancies then subsisting) or the sum outstanding under any mortgages (including costs charges and interest) on the land whichever shall be the lesser

- 8 If the Affordable Housing Mortgagee is unable within the said period of three months to dispose of the land in question in accordance with paragraph 1 of this Part the Affordable Housing Mortgagee shall give notice in writing to the Council offering to transfer the land to the Council at a consideration representing the Market Value thereof at the date of the notice (subject to any leases or tenancies then subsisting) or the sum outstanding under any mortgages on the land whichever shall be the lesser
- 9 If the Council either:
 - 9.1 within 42 days of receipt of the notice given by the Affordable Housing Mortgagee either gives notice in writing that it does not wish to acquire the land or fails to confirm that it wishes to acquire the land, or
 - 9.2 fails to complete the transfer of the land within eight weeks of the price having been agreed or determined by an expert then the Affordable Housing Mortgagee shall be free to sell the land on the open market free of the restrictions in this Deed.

PART 3

Contributions

1. The Developer and the Owners covenant with the Council to pay the following contributions to the Council (or as directed by the Council);
 - 1.1 Affordable Housing Contribution
 - 1.1.1 Forthwith upon occupation of any Dwelling with the Development the Owner shall pay the Affordable Housing Contribution to the Council
 - 1.1.2 No Dwelling within the Development shall be Occupied until the date on which the Council receives the Affordable Housing Contribution

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

The Executive approved the publication of the draft Supplementary Planning Document for consultation purposes on 28th March 2013.

The consultation included the statutory notice published in local media between the dates of 4th and 10th April 2013, a direct mailing of Town and Parish Councils, the Local MP's, the House Builders Federation, neighbouring local authorities, the Council's preferred partner Registered Providers, a selection of house builders operating in the Borough, and their agents and members of the public, supported by the use of the Council's website. The consultation period commenced on 4th April and ran to 5pm on 16th May 2013.

A total of seventeen written responses were received, including one late response. These were from four Parish/Town Councils, three on behalf of other local councils, six on behalf of the major house builders and developers and the remaining four from other interested parties. One late response was also received.

This statement has been produced in line with paragraphs 2.42 and 2.44 of the Council's adopted Statement of Community Involvement (December 2006) and in pursuance of Regulation 12 (a) of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Changes have been made to the consultation draft document in light of comments received. The Council's decisions, including the response to representations, are set out in this statement of consultation.

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
Peter & Liz Ratcliffe	01	9 – Delivering Affordable Housing & Financial Contributions	Details of in-lieu payments extremely vague, it should be explicit on the split between on and off-site. Clearly need for affordable housing throughout the borough but development is focussed on five areas (SDLs & Woodley) leaving large areas with no affordable housing.	In order to provide flexibility the Council does not wish to prescribe on/off-site provision. Applications will be dealt with on a site-by-site basis. Comment noted however applications for residential development could be submitted in each of the borough's town and villages. Where the application site exceeds the affordable housing

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
			Developer profit should not be included as a cost.	thresholds in Core Strategy policy CP5, affordable housing will be sought by the Council. Detailed viability testing was undertaken by Levvels in putting together the Core Strategy. The full evidence (including viability analysis) was examined during the Core Strategy Examination in Public (see section 6 of the Inspector's Report).
Bell Cornwell	02	9	Clarification required that 9.7 relates to sites over 0.16ha	Wording amended for clarity
Guildford Borough Council	03	-	No comments	Noted
Shinfield Parish Council	04	Non specific	• Viability evidence dated and may no longer be accurate or representative • Question an increase in affordable housing requirement to 40% in modest development locations. • Clarification requested on the term 'local affordable housing need' and whether this reflects a need from within a parish or the borough as a whole. • Request HMO restrictions are imposed • Comment that large percentage of affordable homes drives developers to increase the number of homes per hectare	The SPD as required by Regulation 8(3) Town and County Planning (Local Planning) (England) Regulations 2012 has to be consistent with the approach of the Core Strategy. Detailed viability testing was undertaken by Levvels in putting together the Core Strategy, an additional update was undertaken in 2009 in acknowledgement of the challenging economic conditions, to ensure the robustness of the testing, The full evidence (including viability

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
				analysis) was examined during the Core Strategy Examination in Public. The wording in relation to local need has been amended to provide clarity. HMO's do not fall within the remit of affordable housing Comment noted
Wokingham Town Council	05	6 – Design, Distribution and Phasing 7 – Type and sizes 9 – Delivering and financial contributions 11 – Rural exception sites Appendix 4	- Internal space standard should be specified for five and six bedroom houses - On unit mix, a percentage should be specified for five and six bedroom houses - Negotiation should be on a site-by-site basis - The cost of valuation should be borne by WBC and then levied on the developer 11.3 – a maximum age for a housing needs survey should be specified. - The template makes no allowance for 'betterment value' which the developer gains on an unencumbered	The space standards included from the emerging MDD DPD give an indication of the bed spaces required for five and six bedroom houses. Wording amended to provide clarity. The guideline units mix includes an element of 4 plus bedroom houses This is covered by the requirements of Core Strategy policy CP5. The draft SPD refers to the applicant being required to meet the Council's cost for consideration of viability evidence. Applications for Rural Exception Sites will need to demonstrate that any housing needs surveys is representative of existing need.

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LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
			scheme. - Where is the cost of the land within the matrix - Dispute that build costs are identical, due to fit and finish differences. Build costs seem extremely high. - Total on-costs are not generally calculated as a set percentage. - Sales costs should be the same and should be nearer to 10% - Acquisition costs should be the same - Benefit to WBC appears to be skewed in favour of the developer. - WTC believe the matrix is fundamentally flawed.	Detailed viability testing was undertaken by Levvels in putting together the Core Strategy. The full evidence (including viability analysis) was examined during the Core Strategy Examination in Public and found to be sound. Build costs are based on the industry standard BCIS and the other costs reflect industry averages .i.e. sales, marketing, acquisition
Finchampstead Parish Council	06	3 – Development Plans 5 – requirement 11 – Rural sites	- Query whether the Housing Strategy 2010-2013 has been revised. 'where viable' implies a potential loophole. Would like further details on how viability is assessed. - Concerned about implications of 11.7 'a proportion of market housing may be appropriate' - Request plans showing development limits of modest and limited development locations	The Housing Strategy is for the period 2010-2013 inclusive. Work is underway on the development of a new strategy for future years. Issues of development viability would be assessed in line with the approach of the Core Strategy and relevant guidance from the Government. These are provided on the Proposals/Policies Map for the Borough's Development Plan. It is not appropriate to include them within the SPD as they are subject to revision by the Council's

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
		General comments	- Proposed use of commuted sums will not address deficit in affordable housing - Request confirmation that commuted sums from development in Finchampstead will be directed to provision in Finchampstead - Concerned over timescales over which commuted sums may need to accrue to allow any new housing to be provided – could be a lengthy period during which the shortfall is not addressed.	Submitted MDD. Commuted sum payments are ring-fenced towards the provision of affordable housing within the Borough Appendix 5 sets out the potential methods of utilising commuted sums, in addition the Council has established a wholly owned Local Housing Company to facilitate delivery of additional affordable housing in the borough through the use of commuted sums.
Environment Agency	07	Non specific	No comments	Noted
Guy West, Westbuild Homes	08	Non specific	0.16ha threshold was not viability tested and was misapplied and should be removed 40% on greenfield sites within development limits is misapplied as was based on definition in 2008 which has since changed. This should be reduced to align with SDL requirement - The Council should abolish the need for any social housing requirement or payment in lieu for a 2 year period, to stimulate and incentivise house building	The SPD as required by Regulation 8(3) of the Town and County Planning (Local Planning) (England) Regulations 2012 has to be consistent with the approach of the Core Strategy. Detailed viability testing was undertaken by Levvels in putting together the Core Strategy. The full evidence (including viability analysis) was examined during the Core Strategy Examination in Public.

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
Hart District Council	09	None specific	Appendix 6 – a definition of 'Affordable Housing dwellings' is needed	Definition included within Example Legal Agreement
Pioneer Property Services Ltd on behalf of South of M4 Consortium, University of Reading, Taylor Wimpey UK and David Wilson Homes (Southern)	10	3 – Development Plans & other guidance	- Key Worker Study referenced is dated and should no longer be relied upon to inform policy approaches. - Welcomes reference to updated Housing Needs Assessment and Affordable Rent Review 2012 – however believes the 390 dwelling shortfall figure is misleading and should be amended to reflect the net shortfall of 296 dwellings - Questions the reliability of the 2012 HNA conclusions. An updated SHMA should be undertaken urgently and the Core Strategy should be subject to review in light of this.	The Council is of the opinion that the data contained in the study remains of relevance. Wording amended to provide clarity Noted. The Council in its response to a query from the Inspector who is currently examining the Submitted MDD has stated (paragraph 3.11 of WBC27) that “the Council will look to undertake a review of its strategic housing market needs in the future....the Council cannot at this stage commit to who exactly it will work with when assessing housing needs. However the Council will work collaboratively with the appropriate neighbouring and other authorities at a mutually agreeable time, within the context of the Local Enterprise Partnership's Strategic Plan for Growth.”

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
		4 – Evidence of housing need	- Reference to the Key Worker study should be removed 4.5 & 4.6 – should be deleted or amended to note that the conclusions are dated. 4.7 – the evidence referred to should be made available for review and comment, in the absence of which is open to question. 4.8 – should be amended to reflect the number of households in a Reasonable Preference Category.	The Council is of the opinion that the data contained in the study remains of relevance. The Council is of the opinion that the data remains of relevance.
		6 – design, distribution & phasing	6.3 – Inappropriate to impose additional burden via SPD prior to the draft MDD DPD being subject to independent examination and found to be sound. Further there is no requirement within national guidance for non-grant funded affordable dwellings to be constructed to space standards that exceed building regulations. 6.5 – references comments made in relation to the MDD DPD.	It is anticipated research will be published in due course. The council operates an open Housing Register and it is therefore appropriate to include details of the number of people on that register. Wording amended to provide clarity
		7 – type and sizes	The dwelling mix does not appear to be based on an objective up to date assessment of housing requirements and should be deleted	Footnote included to provide clarity. The mix provides a guide as a starting point.
		8 – tenure mix	Welcomes the inclusion of an element of affordable rent. The Council's tenure proposals should reflect wider Government objectives, households can reasonably be housed in affordable rented dwellings and will be entitled to housing benefit if needed. Affordable Rent should not be restricted to 12%, but	The percentage is given based on needs evidence.

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
		9 – delivering affordable housing and financial contributions 10 – key worker housing 11 – Rural Exception Sites 12 – affordable housing legal agreement	should fulfil the entirety of the non-intermediate rented element of Wokingham's affordable housing requirements, the SPD should be amended to reflect this. 8.2 – should be amended to reflect appendix 5 definition of affordable home ownership 8.4 – The prescription of equity share and rent cap will impact on viability and deliverability. All but the first sentence should be deleted. - Flexibilities proposed are welcomed. 9.4 – should be deleted as places the onus on the developer. The council should set out the range of circumstances under which on-site and in-lieu payments will be applied. - As earlier comment – the Key Worker Study is outdated and reference to such should be removed 11. 7 – is overly prescriptive and should be amended to reflect the broader stance taken in the NPPF in respect of the provision of an element of market housing. - It is inappropriate to impose these – these will be a matter of negotiation. The principle of securing affordable housing via condition is established in Circular 11/95, it is preferable to it being secured by way of planning condition.	Appendix 5 deals specifically with the potential use of commuted sums, not on-site provision. Detailed viability testing was undertaken by Levvels in putting together the Core Strategy. The full evidence (including viability analysis) was examined during the Core Strategy Examination in Public. Noted The Council wishes to allow flexibility and negotiation on a site-by-site basis. The Council is of the opinion that the data contained in the study remains of relevance. The Council is of the opinion that 11.7 is reflective of the requirements of NPPF The principle of securing affordable housing through s106 agreement is well established.

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
Swallowfield Parish Council	11	None specific	No comments	Noted
South Oxfordshire District Council	12	None specific	No comments	Noted
Carter Jonas on behalf of Gladman Developments Limited	13/14	General	- The SPD makes reference to several policies in the emerging MDD DPD. These policies have not yet been subject to independent examination, the Council should look to adopt both documents at the same time or ensure the policies referenced in the SPD are clearly acknowledged. - Commuted sum payments – Welcome the Councils shift to more willingness to accept commuted sum payments and the flexibility over when commuted sum payments are made. However have concerns that the request for developers to put forward proposals for both on-site and in-lieu proportion may require developers to work up several proposals which will have cost implications. - Space standards – the SPD should not be adopted prior to the MDD DPD being adopted or the SPD should acknowledge the status of Policy TB07 - Code for Sustainable Homes – again the SPD should acknowledge the status of Policy CC04 - Phasing of affordable housing delivery – support for the revision to the phasing of delivery. - Affordable rent housing – noted the aspiration of not more than 12%, however tenure split will need to be	Wording amended to provide clarity The Council wishes to allow flexibility and negotiation on a site-by-site basis. Wording amended to provide clarity Wording amended to provide clarity Noted CP5 of the Core Strategy is clear that affordable housing

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LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
			considered in the wider context of viability considerations. - Appendix 4 – the Council should give a view at the earliest opportunity on the likely acceptability of a commuted sum - Appendix 5 – reference should be made to the process for monies not spent within a certain timeframe - Appendix 6 – The requirement to notify of the council of the RP before commencing development should be removed. - Definition of affordable housing contribution – it is not known whether the council has a separate agreement for commuted sums acceptance - Affordable rented housing – now includes reference to being inclusive of service charges. Such on costs affect overall viability in modelling tools - Definition of standards – does not mention specifically lifetime homes – which was mentioned earlier in the SPD - Model s106 clauses – There is now no guidance if a developer is unable to secure interest from an RP. The previous wording in the model s106 should be reinstated - Part 2 Price – should include the wording ‘without the need for public subsidy unless otherwise agreed’	requirements are subject to viability. Noted S106 agreements are negotiated on a site-by-site basis and, where necessary, that this will form part of the negotiations. S106 agreements are negotiated on a site-by-site basis and, where necessary, that this will form part of the negotiations. Wording amended to provide clarity Definitions of Affordable Rented housing is strictly in accordance with that detailed in NPPF Wording amended to provide clarity S106 agreements are negotiated on a site-by-site basis and, where necessary, that this will form part of the negotiations. S106 agreements are negotiated on a site-by-site basis and, where necessary, that this will form part of the negotiations.

Note Analysis and any amendments to the SPD is based on the full representation

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LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
			Occupation of affordable housing dwellings – places the onus on the owner to procure the nominations agreement, this is something that the local authority should undertake.	S106 agreements are negotiated on a site-by-site basis and, where necessary, that this will form part of the negotiations.
Savills on behalf of North Wokingham Consortium (Bovis Homes, Crest Nicholson and Gleeson Developments)	15	General	- Questions the application of MDD DPD policy TB07 refers to representations made on the MDD DPD examination - Questions the viability requirement for all affordable housing to meet lifetime homes standards, as unjustified by evidence and ineffective in respect of potential impact on delivery of development. - Questions justification for Code for Sustainable Homes Level 4 (MDD DPD policy CC04) and questions the viability of the requirement. - Para 6.6 – seeks clarification on the statement and it should refer to the delivery of affordable housing in line with an agreed sub-housing strategy. - Para 9.13 – feels this is ineffective, it is imperative that commercially sensitive information remains so, suggests an alternative system which enables evidence of viability to be submitted at later stage of planning process and as part of s106 negotiation and provide for	Wording amended to provide clarity The SPD as required by Regulation 8(3) of the Town and County Planning (Local Planning) (England) Regulations 2012 has to consistent with the approach of the Core Strategy. Detailed viability testing was undertaken by Levvels in putting together the Core Strategy. The full evidence (including viability analysis) was examined during the Core Strategy Examination in Public. The Levvels Study included within its assumptions a requirement that all homes were built to lifetime homes and Code Level 4. Wording amended to provide clarity Wording amended to provide clarity All viability appraisals remain confidential between the Council and the applicant.

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
			an independent third party analysis of the evidence. Notes preferred RP list but would welcome flexibility in respect of which provider is used.	S106 agreements are negotiated on a site-by-site basis and, where necessary, that this will form part of the negotiations.
GVA on behalf of Arborfield Garrison Landowners Consortium (MoD, Aegean Trust Company Limited and Mr Robert Kenyon).	16	General	- The SPD will need to take account of the requirements of the Growth and Infrastructure Act 2013 and associated guidance 6.3 – due to objections to the MDD DPD Policy TB07 – the SPD should await the outcome of the examination and reflect any internal space standards included within the adopted DPD 6.4 & 6.5 – as above in relation to MDD DPD Policy CC04 7.1 – supports the indicative affordable housing mix and supports WBC recognition that affordable housing mix will reflect each housing site as it comes forward 8.2 – WBC proposed flexible approach to tenure is supported and in accordance with recent Government guidance 9.3 – supports flexibility proposed to allow commuted sum payments in lieu of onsite provision 9.6 & 9.8 – The calculation of in-lieu payment should fully reflect the individual characteristics of a housing site and the unique costs to bring that site forward. Objects to the proposed payment at the commencement of development – payment triggers should be subject to negotiations taking account of the extent of wider s106 package that is necessary and the timing of other s106 obligation triggers	Noted Wording amended to provide clarity Wording amended to provide clarity Noted Noted Noted The SPD as required by Regulation 8(3) of the Town and County Planning (Local Planning) (England) Regulations 2012 has to consistent with the approach of the Core Strategy. Detailed viability testing was undertaken by Levvels in

Note Analysis and any amendments to the SPD is based on the full representation

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LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
			- The amount of affordable housing per cent and mix should reflect, adapt and be flexible to, the wider s106 package in relation to larger housing development proposals 12.1 – the use of planning conditions should be considered/permitted as an appropriate alternative to s106 agreement	putting together the Core Strategy. The full evidence (including viability analysis) was examined during the Core Strategy Examination in Public. The principle of securing affordable housing through s106 agreement is well established.
Highways Agency	17	None specific	No comments	Noted
Earley Town Council – Received Late	18	General	- Reference made to Wokingham, rather than Wokingham Borough, throughout the document - Affordable housing should be ring-fenced for accredited residents of Wokingham Borough - Shared ownership sale should always cover the capital costs of the development in the first instance and the level of rent set for rented properties funded by the Borough Council should cover the Borough's costs - Housing mix – some 2 bedroom units for the elderly should be provided - The number of 1 bedroom units should be kept to a minimum - The Council should ensure there is no sub-letting	Document updated The Council requires Nomination Agreements to be secured enabling the Council to allocate affordable housing to those on the Wokingham Borough Housing Register. Social Rent levels are set nationally by the housing regulator (currently the Homes & Communities Agency). The Council aims to provide a mix of affordable housing to meet the housing needs within the borough, including for elderly and vulnerable residents. The Council aims to provide a mix of affordable housing to meet the housing needs within the borough.

Note Analysis and any amendments to the SPD is based on the full representation

LPS18 – Statement of Consultation on draft Affordable Housing SPD (May 2013)

Respondent	Respondent Number	Section of SPD	Comments	Council Comment & Response
			Given the small amount of developable land available, query Earley being identified as a major development location	Sub-letting is not within the remit of the Affordable Housing SPD The SPD as required by the LDF Regulations (Regulation 13(8)(a)) has to conform with the approach of the Core Strategy.

Note Analysis and any amendments to the SPD is based on the full representation

Final Determination Statement on the need for a Strategic Environmental Assessment (SEA) for the Updated Affordable Housing Supplementary Planning Document 2013.

1.0 Introduction

- 1.1 Under “The Environmental Assessment of Plans and Programmes Regulations 2004” (the SEA Regulations), Councils must, where appropriate, carry out a Strategic Environmental Assessment (SEA) of land-use and spatial plans.
- 1.2 The first part of the SEA process is to screen the relevant plan or programme to test whether a SEA is required. The Council has a duty to consult with specified environmental organisations (Natural England, English Heritage and the Environment Agency) when determining the need for SEA under Regulation 9(2) of the SEA Regulations. As explained in section 6, the Council consulted these organisations from 30th January to 6th March 2013.
- 1.3 Taking account of the comments received during the consultation, this report confirms that an SEA is not required for the Council’s Proposed Updated Affordable Housing Supplementary Planning Document (SPD). This report is therefore the Council’s formal SEA Determination Statement under Regulation 9(3) of the SEA Regulations. The agreed position that an SEA is not required for the Updated Affordable Housing SPD is consistent with that associated with the current Affordable Housing SPD (adopted 2 June 2011).

2.0 Updated Affordable Housing Supplementary Planning Document and Wokingham Borough Core Strategy Policy CP5

- 2.1 The Council will prepare an update of the Affordable Housing SPD which will supplement the existing SPD guidance under Core Strategy Policy CP5 (Housing mix, density and affordability) to accommodate the changes in guidance following publication of the National Planning Policy Framework (Mar 2012) and submission of the Managing Development Delivery Development Plan Document (MDD DPD) to the Secretary of State (December 2012).
- 2.2 The Core Strategy (policy CP5) details the circumstances of when and where the Council will seek the provision of affordable housing and this is supplemented by policy TB05 (Housing Mix) of the Submitted MDD DPD which provides guidance on the mix of affordable units sought by the authority. The policies of the Core Strategy and MDD DPD will be amplified in the updated Draft Affordable Housing SPD which, once adopted, to provide further guidance on the requirements in respect of amount, type and size of affordable housing to be provided and the Council’s approach to payments in-lieu of on-site affordable housing (as envisaged in paragraph 4.34 of the Core Strategy). The document will also provide certainty to developers about the requirements for

affordable housing as part of both residential and employment developments.

- 2.3 The document does not introduce new policy but instead focuses on implementation and evidence requirements in relation to a policy targeting the provision of additional affordable housing.

3.0 Strategic Environmental Assessment

- 3.1 Under the SEA Regulations, local authorities must, where appropriate, carry out a SEA of land-use and spatial plans.
- 3.2 Regulation 5 (2) of the Regulations describes that an environmental assessment should be undertaken for a plan or programme which -
(a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and
(b) sets the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC.
- 3.3 The Supplementary Planning Document falls under criterion (a) of Regulation 5(2), being a plan prepared for town and country planning or land use. However, for a plan or programme to be deemed relevant under SEA Regulation 5(2) it must also be consistent with sub-paragraph (b).
- 3.4 In respect of sub-paragraph (b) the SPD will supplement existing policy within the Adopted Core Strategy, providing further guidance on the requirements in respect of amount, type and size of affordable housing to be provided. Furthermore, whilst Core Strategy Policy CP5 does not directly relate to any of the uses listed under Annex I of EC Directive 85/337/EEC as amended by Directive 97/11/EC, it is recognised that some proposals for residential development could fall within the definition of an “urban development project” within Annex II of the Directive if the site exceeded 0.5 hectares. It is considered appropriate to review the SPD as relevant to the definition under Article 5(2).
- 3.5 Additionally, Regulations 5(3) indicates that an SEA could be required where:
“The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.”
With respect of this, it is recognised that Council’s adopted Core Strategy approach to delivering additional dwellings in the borough required an assessment pursuant to Article 6 of the Habitats Directive. This was due to the likely significant effects from such development upon the Thames Basin Heaths Special Protection Area (the SPA). However, since the Affordable Housing SPD does not detail the

specific requirements for affordable housing on a site which could lead to significant effects upon the SPA, it is not considered that the SPD will itself require an assessment under the Habitats Directive. It is recognised that all applications for residential development in the borough would in any event need to be assessed for whether they require an assessment under Article 6 of the Habitats Directive. Where a proposed residential development was considered to generate likely significant effects upon the SPA, these would need to be addressed before the authority could apply the approach in the SPD.

- 3.6 Further to the above, Regulation 5(6) of the SEA Regulations indicates that an environmental assessment need not be carried out –
(a) for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level; or
(b) for a minor modification to a plan or programme of the description set out in either of those paragraphs,
unless it has been determined under regulation 9(1) that the plan, programme or modification, as the case may be, is likely to have significant environmental effects, or it is the subject of a direction under Regulation 10(3).
- 3.6 Since the SPD has to conform to the approach of the Core Strategy, and the very limited amplification it provides, it therefore falls under criterion (b) of Regulation 5(6). It is only therefore if it is considered 'likely' that the SPD will have significant environmental effects that a full SEA is required.
- 3.7 The regulations advise that the likelihood of any significant environmental effects should be determined by a screening process, which should use a specified set of criteria (set out in Schedule 1 to the Regulations). The results of this process must be summarised in an SEA screening statement, which must be publicly available.
- 4.0 SEA Screening of the Updated Affordable Housing SPD**
- 4.1 The screening process set out in Regulation 9 of and Schedule 1 to the Regulations includes two sets of characteristics for determining the likely significance of effects on the environment as follows:
- The characteristics of the Updated Affordable Housing SPD; and
 - The characteristics of the effects and of the area likely to be affected.
- 4.2 Under each characteristic are a number of criteria with which to assess the SPD against. These criteria are individually assessed for the SPD below.

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Criteria	Details	Likely Significant effect?
1. The characteristics of plans and programmes, having regard, in particular, to —		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The Affordable Housing SPD will supplement policies CP5, CP15 and CP16 of the Council's adopted Core Strategy together with policy TB05 of the Submitted MDD DPD, thereby providing further guidance on the requirements in respect of amount, type and size of affordable housing to be provided. The SPD therefore supplements existing policy rather than setting a framework in it self.	No
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The Affordable Housing SPD will supplement policy within the adopted Core Strategy, submitted MDD DPD and sits at the lowest tier of the Local Development Framework.	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The Affordable Housing SPD will promote sustainable development by providing further detail about dwellings can be delivered that meet the needs of the whole community i.e. achieving the Council's wider social objectives). It will not however provide environmental policy in its own right so does not have a significant effect on environmental considerations.	No
(d) environmental problems relevant to the plan or programme; and	The Affordable Housing SPD will supplement policies CP5, CP15 and CP16 of the Core Strategy together with policy TB05 of the Submitted MDD DPD and is not being prepared in order to tackle a particular environmental problem.	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The Affordable Housing is not relevant to the implementation of EC legislation on the environment.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—		
(a) the probability, duration, frequency and reversibility of the effects;	The SPD supplements policy within the adopted Core Strategy, providing further guidance on the requirements in	No

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	respect of amount, type and size of affordable housing to be provided. Since the SPD does not relate to specific locations within the borough, it is extremely unlikely that its implementation will generate significant environmental effects. This is because any sites where a planning application is submitted to which the SPD is then applied will only be acceptable to the authority where environmental effects do not arise. Therefore, the approach within the SPD does not affect how the authority would consider applications with respect of these issues	
(b) the cumulative nature of the effects;	As noted above, the SPD would not in itself result in new activities with any significant environmental effects. Therefore, it is extremely unlikely that any cumulative impacts will arise. Where they are likely to arise, the Council through determining planning applications will ensure such issues are appropriately considered and addressed. Whilst cumulative issues could arise from the delivery of housing in proximity to the SPA, these would need to be addressed through the approach in the Core Strategy rather than this SPD. Therefore the approach within the SPD does not affect how the authority would consider applications with respect of these issues	No
(c) the transboundary nature of the effects;	As noted above, the SPD would not in itself result in new activities with any significant environmental effects. Therefore, it is extremely unlikely that any transboundary impacts will arise. Where they are likely to arise, the Council through determining planning applications will ensure such issues are appropriately considered and addressed. The approach within the SPD does not affect how the authority would consider applications with respect of these issues	No
(d) the risks to human health or the environment (for example, due to accidents);	The delivery of affordable housing is not considered to lead to increased risks to human health or the environment, when compared to the production of non-affordable housing. The	No

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	approach within the SPD does not affect how the authority would consider applications with respect of these issues	
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The SPD will not change the focus of the policy approach of the Core Strategy and is therefore not considered to have any significant impacts in this regard. The approach within the SPD does not affect how the authority would consider applications with respect of these issues	No
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and	Since the SPD amplifies the approach of the Core Strategy, it is not considered to significantly affect any of these matters directly. Where applications are submitted which could affect these matters, the Council through determining planning applications will ensure such issues are appropriately considered and addressed. The approach within the SPD does not affect how the authority would consider applications with respect of these issues	No
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The only areas of recognised national importance for environmental matters in the Borough are the designated Sites of Special Scientific Interest. In addition, the southern part of the borough lies within areas where development could adversely affect the SPA designated pursuant to the Birds Directive. Where applications are submitted which could affect these sites, the Council through determining planning applications will ensure such issues are appropriately considered and addressed. The approach within the SPD does not affect how the authority would consider applications with respect of these issues.	No

5.0 Consultation with Statutory Bodies

- 5.1 The Council has a duty to consult with specified environmental organisations (Natural England, English Heritage and the Environment Agency) when determining the need for SEA and, in situations where an SEA is not deemed to be required, it also has a duty to prepare a statement of its reasons for this determination. An SEA Screening Statement was sent to the following organisations:
- The Historic Buildings and Monuments Commission for England (English Heritage);
 - Natural England; and
 - The Environment Agency.
- 5.2 The Council consulted these bodies on its Draft SEA Determination Statement from 30th January 2013 to 6th March 2013. A copy of its reasoning why a SEA was not required was also made available at the planning reception of its Shute End offices and its website.
- 5.3 During the consultation, responses were received from English Heritage, Natural England and the Environment Agency (copies enclosed in appendix 1). The responses of these organisations all agreed that an SEA was not required for the Updated Affordable Housing SPD.

6.0 Final Conclusion

- 6.1 The Affordable Housing SPD will supplement policy CP5 in the adopted Core Strategy together with policy TB05 of the Submitted MDD DPD by providing further guidance on the requirements in respect of amount, type and size of affordable housing to be provided. The Screening of the document confirmed that it is not likely that the SPD will have any significant environmental impacts and, therefore, that a SEA is not required. This view was confirmed through the consultation with the bodies identified in section 5 above.
- 6.1 As paragraph 1.3 indicates, the Council when undertaking an SEA determination for the adopted Affordable Housing SPD (to be replaced by an updated version) concluded that an SEA was not required. Therefore, the Council's provisional view with respect of the updated Affordable Housing SPD reflects its earlier position.

7.0 The Statement of Determination

- 7.1 It is agreed that a Strategic Environmental Assessment is NOT required for the Updated Affordable Housing SPD for the reasons set out in Section 4 above. This approach reflects the views of the organisations who responded to the consultation.

**Appendix 1 – Copies of Correspondence with English Heritage, Natural
England and Environment Agency concerning Draft SEA Determination
Statement**

From: Turner, Marc (NE) [mailto:Marc.Turner@naturalengland.org.uk]
Sent: 04 February 2013 15:50
To: Graham Ritchie
Subject: RE: Consultation by Wokingham BC's on whether its updated Affordable Housing
SPD needs a Strategic Environmental Assessment

Hi Graham,

I have no issue with your conclusion. Do you want an official letter saying so?
Or is this enough?

Thanks

Marc

Marc Turner
Senior Adviser
Land Use Ops
2nd Floor
Cromwell House
15 Andover Road
Winchester
SO23 7BT

Direct Dial: 03000 604921

From 1 April please send consultations to Natural England by email to
consultations@naturalengland.org.uk. Or, if it is not possible to consult us
electronically then consultations should be sent to the postal address below.

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
Crewe
Cheshire
CW1 6GJ

From: Graham Ritchie [mailto:Graham.Ritchie@wokingham.gov.uk]
Sent: 29 January 2013 15:52
Cc: Carol Lovell; John Spurling
Subject: Consultation by Wokingham BC's on whether its updated Affordable
Housing SPD needs a Strategic Environmental Assessment

Final Determination Statement on need for an SEA of the Affordable Housing
SPD Update 2013

Dear Sir/Madam,

I am writing with respect of an Updated Affordable Housing Supplementary Planning Document (SPD) which the Council is currently preparing. As part of the work in preparing an the updated SPD, the authority needs to consider whether a Strategic Environmental Assessment would be required.

<<Draft 2013 Affordable Housing SPD SEA Determination Statement.pdf>>

The Council has undertaken a draft determination of whether such an Assessment is required for the updated SPD (attached). This draft determination indicates that the Council does not consider that an SEA is required for the updated SPD. I am therefore writing to obtain your views on whether you agree or disagree with the Council's provisional view by 5pm of Wednesday 6th March 2013. A copy of this draft determination is also available on the Council's website - <http://www.wokingham.gov.uk/planningcontrol/planning/planningpolicies/housing/adoptedaaffordablehousingspd/>.

If you have any queries, please do not hesitate to contact me.

Yours faithfully,

Graham Ritchie
Senior Planning Officer, Land Use and Transport Team,
Wokingham Borough Council
PO Box 157, Shute End
Wokingham
Berkshire, RG40 1WR

Tel: 0118 974 6457
Email: graham.ritchie@wokingham.gov.uk
www.wokingham.gov.uk

Final Determination Statement on need for an SEA of the Affordable Housing
SPD Update 2013

Wokingham Borough Council
Development Plans Team
PO Box 157
Wokingham
Berkshire
RG40 1WR

Our ref: WA/2011/110349/SE-
02/SC1-L01

Your ref: N/A

Date: 08 February 2013

Dear Sir/Madam

**Updated Affordable Housing Supplementary Planning Document (SPD)
Strategic Environmental Assessment Draft Screening Statement**

Thank you for consulting the Environment Agency, which we received on 29 January 2013. We have the following comments:

We agree with your determination that the Affordable Housing Supplementary Planning Document (SPD) does not require a formal Strategic Environmental Assessment (SEA) under the SEA Directive because the SPD provides interpretation of existing policy; supplements current guidance and should therefore have no significant environmental effects.

If you have any queries, please do not hesitate to contact me on the number below.

Yours sincerely

**Mr Gareth Johns
Planning Officer**

Direct dial 01491 828370

Direct e-mail planning-wallingford@environment-agency.gov.uk



ENGLISH HERITAGE

SOUTH EAST

Mr Graham Ritchie
Senior Planning Officer
Land Use and Transport Team
Wokingham Borough Council
PO Box 157, Shute End
Wokingham
Berkshire, RG40 1WR.

Our ref:
Your ref:

Telephone 01483 252040
Fax

4th March 2013

Dear Mr Ritchie,

Draft 2013 Affordable Housing SPD SEA Determination Statement

Thank you for your e-mail of 29th January seeking the views of English Heritage on the Council's draft determination that an SEA is not required for this updated SPD.

English Heritage agrees with the Council's provisional conclusion that it is not likely that the SPD will have any significant environmental impacts and, therefore, that an SEA is not required.

Yours sincerely,

Martin Small
Historic Environment Planning Adviser
(Bucks. Oxon, Berks, Hants, IoW, South Downs and Chichester)

E-mail: martin.small@english-heritage.org.uk

This publication is produced by Wokingham Borough Council. If you would like some help understanding it then please call (0118) 974 6000

Development & Regeneration
Wokingham Borough Council
PO Box 157
Shute End
Wokingham
RG40 1WR

Tel: (0118) 974 6000

