

Affordable Housing	
Summary of Comments Received (respondent ref in brackets)	Council's Response
<u>Thresholds</u>	
<ul style="list-style-type: none"> ▪ There is no justification for seeking affordable housing on sites smaller than the site size in the adopted Local Plan – this is contrary to 1/97 and 6/98 – paragraphs 4.21 to 4.25 should be deleted. (1) (30) Justification needed for contributions for sites less than 1-14 dwellings – contrary to 6/98 and adopted Local Plan (12) (31) ▪ Thresholds for affordable housing (HSG.9) should be applied flexibly in regard to developers of special needs housing such as sheltered housing for the elderly (11) ▪ Object to Local Plan policy thresholds for affordable housing as exceptional need cannot be justified (1) ▪ The Council should seek the provision of homes rather than contributions in developments of 1-14 dwellings in rural communities of less than 3,000 population (10) ▪ Consideration should be given for lowering the threshold for rural development below 3,000 population i.e. below current thresholds of 15 dwellings or 0.5ha. (17) ▪ Consideration should be given to different thresholds for urban and rural sites (not just exemption sites) – 8/10 for rural sites (17) ▪ Calculation should be made against the total m² of a project and not against the number of units (17) ▪ Rigid application of 30% target – developments can become frustrated due to the burden of excessive affordable housing proportions. (24) 	<p>These paragraphs are no longer included in the SPG.</p> <p>The Local Plan inquiry Inspector said that such housing should also be considered for affordable housing provision.</p> <p>It is not possible to object to adopted local plan policy. However, the Local Plan policy thresholds are fully justified by local circumstances. These matters will be addressed through the review of the Local Plan.</p> <p>See above</p> <p>See above</p> <p>30% is an appropriate target having regard to local needs and is set out in the Local Plan. There is no evidence that it frustrates development.</p>

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<u>Timing of Contributions</u>	
<ul style="list-style-type: none"> ▪ Object to presumption that all affordable housing units will be in place before 80% of the market housing has been completed – contrary to government's desire to see pepper potting of mixed tenures throughout sites and places additional burdens on developers to complete affordable housing units before sufficient revenue is generated from the development to fund the affordable housing contributions (24) ▪ Object to timing of financial contribution requirement on completion of first dwelling – contrary to 6/98 para 23 – obligations should be drafted so they allow the developer to make the contribution towards the costs of providing affordable housing on a different site, only on the signing of contracts to provide the affordable housing element. Alternatively a covenant should be included to allow for repayment to developer on or by a specified date if such sums have not been used for that purpose (14) ▪ Object that financial contribution required on completion of first dwelling – payments need to be staggered to accord with the number of completions of dwellings for sale. (24) 	<p>It is considered that the time scales are appropriate. If variations are required in individual cases this will be a matter for negotiation.</p>
<u>Commercial Development</u>	
<ul style="list-style-type: none"> ▪ Only some forms of development could be justified in making a contribution to affordable housing – each site should be judged against the tests in 1/97. (27) (24) ▪ Figure from commercial development should be calculated on a site by site basis (24) 	<p>The section on commercial development is no longer included but this will be a matter for review. Policy E2 of the emerging Structure Plan expects major commercial developments to mitigate their impacts and this could involve the provision of affordable housing.</p>

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<ul style="list-style-type: none"> ▪ No evidence to support the fact that 5% of employees of new commercial floorspace would require affordable housing (24) (21) (12) ▪ Alternative to 5% assumption would be to estimate employee generation and apply a ratio of the average number of workers per dwelling in the area to produce a potential housing impact figure. Applying 30% to this figure could provide the basis for negotiation on an appropriate affordable housing contribution (21) ▪ The beneficial effects of commercial development should be acknowledged – such as reduction in levels of commuting out of the district (23) ▪ The level of affordable housing should be based on general housing provision alone – additional provision on the basis of commercial development would constitute double counting (23) ▪ The requirement for affordable housing from commercial development is contrary to para 14 of PPG3 (30) 	<p>See above.</p>
<u>Financial Contributions</u>	
<ul style="list-style-type: none"> ▪ Support financial contributions in lieu of on-site provision (24) ▪ Inconsistency in allocation of affordable housing on different sites – clearer guidance needed re financial contribution or on site provision (17) (30) ▪ How and where will money from the basic contribution for affordable housing be used? (6) ▪ If a site is unsuitable for affordable housing provision then it is unsuitable under the provisions of both Circular 1/97 and 6/98 to seek off-site contributions (1) ▪ The proposed calculations for financial contributions do not 	<p>The SPG provides guidance on financial contributions which provides for a flexible approach. A new approach to calculating financial contributions has been included in the SPG.</p>

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<p>correspond with the values used for on-site provisions – 80% of TCI used for on-site provision and 100% of TCI used for financial contribution calculation (30)</p> <ul style="list-style-type: none"> ▪ On cost percentages should be referred to separately (12) ▪ Appendix 3 may be flawed – hypothetical affordable units for the site would have to be agreed also (12) 	
Funding	
<ul style="list-style-type: none"> ▪ There should be a change to the discounted TCI calculations to get closer to a grant free solution (17) ▪ On issue of full on site provision there will be delivery difficulties on current proposal for 80% of Band B1 TCI (para 4.17) – value paid should be nearer 50% of TCI figures to ensure Council can control subsidy and delivery of project (10) 	<p>The SPG has been revised to ensure that on site provision does not place undue burdens on the public purse – a grant free solution.</p>
Pepper-Potting	
<ul style="list-style-type: none"> ▪ Support principle of pepper potting but consider preferred maximum grouping of 5 dwellings is inflexible and inappropriate. (24) ▪ “Pepper potting” should be reduced from a requirement to a desirable approach so each scheme can be looked at on its merits (10) (1) ▪ It should be noted that “pepper-potting” will allow for clustering of affordable housing (3) ▪ Balance has to be struck between desire for social integration 	<p>The Council considers that the guidance is appropriate but allows due flexibility. The circumstances of each case will continue to be taken into account.</p>

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<p>and day to day economies of scale that blocks of affordable housing have to RSLs (3) (1)</p> <ul style="list-style-type: none"> ▪ “Pepper-potting” in flats does not work and should be recognised (3) ▪ Areas with large expensive houses should not be safeguarded from pepper-potting approach as this tends to artificially increase the value of properties in those areas (2) ▪ Support “pepper-potting” approach to affordable housing (2) ▪ Integration of affordable housing “pepper-potting” should be reviewed via next review of Local Plan – no current Local Plan policy - SPG not correct vehicle to debate issue (12) 	
<u>Sustainable Development</u>	
<ul style="list-style-type: none"> ▪ Sustainable elements should be a prerequisite of all new development – highlighting requirements for affordable housing will only drive a wedge between social integration (3) ▪ Support environmentally sustainable design but concerned that this additional cost would threaten the viability of schemes – features should be encouraged rather than required (24) (10) ▪ Extra costs of sustainable design / accessibility should be reflected in increased TCI – from 80% to circa 85% (12) 	<p>It is appropriate for sustainability considerations to be taken into account.</p>
<u>Accessibility</u>	
<ul style="list-style-type: none"> ▪ Para 5.8 should refer to ‘special access needs’ as opposed to 	

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<p>'special needs' cases as set out in section 6 (3)</p> <ul style="list-style-type: none"> ▪ Requiring all affordable properties to be constructed to "lifetime homes" standards will increase costs – a proportion should be provided on a "lifetime homes" basis (10) (3) (30) No evidence is put forward regarding the requirement for lifetime homes and no definition is given as to what qualifies as a lifetime home (30) The proportion of dwellings capable of adaptation should be a reflection of the percentage of residents who occupy affordable housing who have special needs (3) (30) ▪ Para 6.3 should be included in accessibility paragraph at 5.8 – the two issues appear to have been confused (3) ▪ How is average dwelling size of 76m² arrived at? (12) 	<p>It is considered appropriate for homes to be built to lifetime homes standards in order that they are able to cater for changes in the circumstances of occupants over the years. A proportion approach is not appropriate as it cannot be known which occupants will require adapted dwellings over the years.</p> <p>This figure is used by the Housing Corporation</p>
Key Workers	
<ul style="list-style-type: none"> ▪ Further provision of key worker housing should be encouraged (9) ▪ Definition of key workers should include all Royal Berkshire Fire and Rescue Service employees (9) ▪ A brief definition of key workers should be included in an appendix (21) (3) ▪ Are ground rules the same for key workers for shared ownership and for rent when they can clearly afford to pay more? (12) 	<p>The definition of key worker is continuing to be evolved. Occupancy arrangements would be dealt with in the legal agreement or in accordance with the approach taken by the registered social landlord.</p>
Form of Provision	
<ul style="list-style-type: none"> ▪ Tenure restrictions or requirements should not be imposed where an RSL is involved as it may cause problems when it comes to finding an RSL partner in future. (23) 	<p>The Council and its partners are best placed to determine the appropriate mix of tenure on a site. However, the SPG has been amended to allow a flexible approach to tenure on a site by site</p>

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<ul style="list-style-type: none"> ▪ Council needs to monitor the delivery of all forms of affordable housing and adjust the provision of rented and shared ownership homes according to demand (17) ▪ The form of provision is a matter for agreement between the local authority and the developer (para 22 of 6/98) – it is not for the Council to unilaterally determine what sort of provision should be made. Paragraphs 4.10 to 4.14 should be amended to make this clear (1) (14) (30) ▪ Widest possible range of housing opportunities should be sought including shared equity, low cost, subsidised rented (9) ▪ Welcome comments regarding impact on land values for on site provision – para 4.16 (12) ▪ Object to level of prescription and blanket application of contents of S106 agreements for all developments over 15 dwellings or 0.5ha. – agreement should be determined on an individual site basis (24) (30) ▪ Limiting the list of RSLs to 4 is not a positive move – the opportunity of another RSL in the area may focus attention on issues affecting tenants and would remove what might be seen as a monopoly (2) 	<p>basis. This allows for a wide range of solutions and types of affordable housing. The list of RSLs is no longer limited but it will still be necessary to show that the RSL can continue to make a commitment to the area.</p>
Policy Background	
<ul style="list-style-type: none"> ▪ Government consultation paper and draft Berkshire Structure Plan are in draft form only – not a sound basis for SPG (23) (30) ▪ Para 4.27 should quote the revised version of Structure Plan Policy E2 (21) 	<p>The approach in the SPG as amended reflects adopted development plan policies and extant Government guidance.</p>
Site Specific Issues	

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<ul style="list-style-type: none"> ▪ Lack of flexibility – some windfall sites contain obstacles to the provision of affordable housing as recognised in circular 6/98 (24) ▪ Contaminated sites should be exempt from affordable housing contributions or an allowance made for costs of remediation (24) ▪ Council should confirm that care homes, hostels, boarding houses and annexes to existing dwellings are exempt from requirement for affordable housing (3) ▪ Possible internal inconsistencies between para 4.10 and 4.14 – size, location and character of sites (23) ▪ Issue re development in rural areas in para 4.14 given restrictiveness of planning policies on development in areas remote from settlements or rural services. (23) 	<p>It is not considered likely that there would be many circumstances in West Berkshire where there would be genuine obstacles to provision of affordable housing in terms of the economics of provision. It is not considered appropriate or necessary to list possible exceptions. Paragraphs 4.10 - 4.14 of the original draft have been substantially edited.</p>
<u>Housing Corporation Standards</u>	
<ul style="list-style-type: none"> ▪ It is not compulsory to build shared ownership units to Housing Corporation scheme development standards – no reason to do so (12) (10) ▪ Requirements of SPG go well beyond the current requirements of the Housing Corporation's Scheme Development Standards and Capital Funding Guidance (30) ▪ Housing Corporations current scheme development standards are the 5th edition published 2003 not 2001 as stated (12) 	<p>It is important that the quality of affordable housing complies with appropriate standards. Affordable housing does not mean second rate housing. The most recent Housing Corporation Standards will be referred to.</p>
<u>Other</u>	
<ul style="list-style-type: none"> ▪ Overall aim of the guidance is supported (21) ▪ The word “expect” should be substituted for the word “seek” as it does not reflect tests and process of negotiation and agreement 	<p>Noted and welcomed. The Core Guidance has been amended to refer to the seeking of obligations.</p>

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<p>(14)</p> <ul style="list-style-type: none"> ▪ Should be a more positive stance to a number of elements where “will” needs to be used rather than “should”. (10) ▪ Para 4.1 should be amended to reflect guidance in 6/98 (para 17) re issue over conditions as opposed to obligations (14) 	<p>In most cases agreements will be the more appropriate means for securing appropriate provision.</p>