
MEMORANDUM

To: Niko Grigoropolous
Case Officer

Our Ref:

From: Lynn Robinson
Housing Development Officer

Your Ref: 20/01238/OUTMAJ

Extn: 2923

Date: 5 August 2020

Sandleford Park

Thank you for your memo regarding the above proposed development.

The National Planning Policy Framework strongly supports the delivery of affordable housing that meets a recognised housing need in the District. The Council's policy for affordable housing provision is set out in CS6 of the West Berkshire Local Plan 2006-2026. It enables the authority to seek affordable housing either on site or as a financial contribution in lieu of on site provision on sites of 5 units or more. The contribution levels for affordable housing are as follows:

5 to 9 dwellings	20% affordable housing
10 to 14 dwellings	30% affordable housing
15 or more units or 0.5 ha or more	30% affordable housing on brownfield sites or 40% on greenfield

This contribution is rounded up or down to the nearest whole unit.

The Planning Statement confirms that affordable housing will be delivered throughout the site consistent with Core Strategy Policy CS6. The Council will seek a tenure split of 70% social rent and 30% intermediate housing, such as shared ownership. Due to the requirement to provide affordable home ownership it is the Council's preference to seek shared ownership provision on the remaining 30%.

The Planning Obligations Supplementary Planning Document (SPD) was formally adopted by the Council on the 11th December 2014. This provides guidance to landowners, developers and West Berkshire residents about the use of developer contributions after the implementation of the Community Infrastructure Levy (CIL). It sets out the Council's policy to securing affordable housing contributions and it states that affordable housing should be provided on site unless there are exceptional circumstances, or where alternatives, such as replacement provision on a separate site would better meet the Council's strategic

objectives. The Planning Obligations SPD applies to planning applications or appeals determined on or after 1st April 2015.

Any request for a diversion from this policy should be accompanied by an open book viability assessment. For the avoidance of doubt Affordable Rent instead of Social Rent is not considered policy compliant.

In accordance with the CIL Regulations 2010 (as amended), the element of any development which is deemed affordable (in accordance with the West Berkshire Core Strategy) will be eligible for relief from paying CIL, together with a proportional element of any communal areas forming the development.

The Government currently states that the provision of affordable housing will remain within the Section 106 regime. Requirements to deliver affordable housing will be determined during the planning application process and secured through a Section 106 legal agreement, to be completed prior to determination of the planning process. The full cost of providing affordable housing on site (in accordance with our policy) was taken into account of when setting our level of CIL.

Further details can be found within paragraphs 49 to 54 of the CIL Regulations 2010 (as amended).

The developers are proposing up to 1080 new dwellings on this site, including an 80 extra care housing facility (Use Class C3) as part of the affordable housing provision. As this is Greenfield land, 40% of all dwellings on site are required for affordable housing provision, which equates to a total of 432 units, 80 of which are proposed to be one and two bed extra care housing units, with 352 units across the remainder of the scheme.

It is noted, however that the Application Form schedule is showing a different quantity of each and can only assume this has been made in error, and will consider the proposal to consist of that which is outlined in the Affordable Housing Statement and Planning Statement only.

80 Extra Care Housing Units as part of the affordable provision

The proposed mix of 70 one bed and 10 two beds would appear to be acceptable, and we would expect a policy compliant tenure split of 70% social rent and 30% shared ownership for these units.

In order to remain as part of the overall 40% provision of affordable units on this scheme the Extra Care units must be identified and secured via s106 as affordable in perpetuity. If, however, in the event that the developer has not concluded an agreement with an Extra Care Provider by the commencement of development then the Council would wish to see an alternative proposal for the provision of affordable housing either by:

- 40% of Extra Care provision within the proposed extra care facility being Affordable Housing, with the remaining 60% of the Affordable Housing being pepperpotted across the remainder of the scheme with a Housing Mix that is policy compliant, or

- 80 units provided across the remainder of the scheme, with size and tenure mix and in locations identified and agreed with the Council, and in accordance with policy.

352 affordable units – Housing Mix

We will be seeking provision of policy compliant affordable homes due to the number of applicants on the Common Housing Register and SHMA data requirements, and as identified in the table below:

tenure	1080 new homes		80 ah extra care		352 affordable units (excl ex care)				
	%	ah		SR (70%)	SO (30%)	sr (70%)		so (30%)	
1 bed	30-35%	106	123	50	22	74	86	32	37
2 bed	30-35%	106	123	6	2	74	86	32	37
3 bed	25-30%	88	106			62	74	26	32
4+ bed	5-10%	18	35			13	25	5	11
totals				56	24	246		106	

The Housing mix identified in Table 3 (para 3.24) of the Planning Statement, and para 2.14 of the Affordable Housing Statement confirms an intention to deliver in accordance to policy and also in line with the SHMA and Table 140.

We would like to see bungalows and smaller units alongside larger units delivered as part of the affordable provision of the scheme, and also to establish what provision of adapted housing will be provided – i.e. M4 Cat 3 etc. This would assist in the delivery of a diverse street scene that captures our aims around pepper-potting and also to provide mixed communities e.g. older people/younger families/ single people etc. and as made reference to in Table 2 of para 5 of the Affordable Housing Statement – integration, and to accord with policy CS4 which expresses our aims to meet the needs of the whole community including those with specialist requirements.

Tenure

The SPD states the affordable housing should consist of 70% social rent and 30% intermediate housing options such as shared ownership. We therefore require 246 (rounded down) of the units for social rent and 106 (rounded up) of the units for shared ownership, and as noted in the table above.

Both the Planning Statement and the Affordable Housing Statement confirm that this development will be delivered in accordance with this policy.

Pepper-potting

In order to create sustainable, inclusive and mixed communities affordable housing on new developments should be fully integrated within the general market housing, and the Council expects affordable housing to be pepper-potted throughout in groups of not more than 5 dwellings in any single location within the development ensure satisfactory integration.

The Planning Statement notes that the developers are not proposing mixed tenure flatted blocks, and we would therefore expect that the affordable housing blocks be kept small in flat numbers and massing.

Phasing

The application expresses an intention to phase the affordable delivery, with the tenure split being adhered to across the scheme and as whole and determined on a parcel by parcel basis, and that the development in each of the phases will not be able to commence until the Affordable Housing Scheme has been approved by the Council. We await further details and an affordable housing schedule which identifies the location of each of the affordable dwelling plots.

The Council will assess all affordable housing development proposals against the Nationally Described Space Standards (updated March 2015), as tabled below:

Number of Bedrooms (b)	Number of bed spaces (persons)	1 storey dwelling (m ²)	2 storey dwelling (m ²)	3 storey dwelling (m ²)
1b	2p	50	58	
2b	4p	70	79	
3b	6p	95	102	108
4b	8p	117	124	130

To ensure the dwellings are suitable for future occupants, all two bedroom dwellings should provide a minimum of 4 bed spaces, 3 beds should provide and minimum of 6 bed spaces, and 4 should provide a minimum of 8 bed spaces.

The Council recommend that all affordable housing dwellings should be developed to Lifetime Home Standards and conform to the latest Design and Quality Standards published by Homes England, to ensure that they are readily adaptable for those with additional needs.

The Council also encourages developers to consider sustainable features and methods of construction to reduce energy consumption and conserve resources.

Please note that the SPD requires all affordable housing on planning gain sites to be delivered with nil public subsidy. Developers are expected to make full provision for nil grant affordable housing on all qualifying planning gain sites and pay due consideration when negotiating the land value of a site.

We confirm that we have assessed this as a stand-alone application, and have not taken into consideration the affordable housing data provided for Sandford Park West, as this is not part of this application.

Please do not hesitate to contact me if you require further clarification.
Kind regards

Lynn Robinson
Housing Development Officer