M E M O R A N D U M

To:	Michael Butler	Our Ref:	
From:	Emma Craig Housing Development Officer	Your Ref:	22/00244/FULEXT
Extn:	3933	Date:	15/03/22

Land Rear Of The Hollies, Reading Road, Burghfield Common, Reading.

Thank you for your consultation request for 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 Core Strategy Development Plan Document (DPD). 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:

able 1				
Number of Dwellings to be provided On Site	% of Affordable Housing to Comply with CS6 of Core Strategy			
5 - 9 Dwellings	20%			
10 - 14 Dwellings	30%			
15 or more dwellings or more than 0.5 ha - Brownfield	30%			
15 or more dwellings or more than 0.5 ha - Greenfield	40%			

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

The applicants are proposing 32 dwellings on this site, 40% of all dwellings on site are required for affordable housing provision, the Council would therefore expect 13 affordable housing dwellings to be provided on site. We welcome that the applicant is proposing to provide 13 affordable homes.

The SPD states the affordable housing should consist of 70% social rent and 30% intermediate housing options such as shared ownership, however it is now National Policy for First Homes to contribute 25% of all Affordable Housing with Local Authorities able to retain their original policy compliant level of social rent. West Berkshire Council now require 70% Social Rent, 25% First Homes and 5% Shared Ownership. As the Council require 13 affordable housing dwellings on this site, they should consist of 9 of Social Rent tenure, 3 First Homes and 1 of Shared Ownership.

This tenure mix also meets the NPPF requirement that 10% of the total proposed homes should be available for affordable home ownership, in this case the First Homes and Shared Ownership would contribute towards this.

The plan is currently showing the unit mix of the affordable dwellings as set out in Table 2 below. However we would request a reconsideration of the mix to reflect the local need set out also in Table 2 and in more detail in Table 3.

Table 3

	Proposed	Required - Local Needs Information
1 Bedroom	2	3
2 Bedrooms	9	4
3 Bedrooms	2	4
4+ Bedrooms	0	2

Table 3 below sets out the unit mix of affordable housing the Council require. The Social Rent mix is based on the bedroom needs of households active on the Housing Register as of December 2021 who have expressed an interest in accommodation in and around Burghfield Common. The Shared Ownership mix is based on the bedroom needs of those households registered with Help to Buy South in West Berkshire correct as of February 2022. The First Homes mix is concluded from the SHMA market unit mix, however it is understood this will be dependent on the market price of the units and which will fit into the criteria of a discount of 30% with a maximum sale price of £250,000.

Data from the Housing Register is very similar to that contained within the SHMA, however recent feedback and data from Help to Buy indicates that there is less of a need for smaller Shared Ownership properties and a need for houses as opposed to flats.

Size / Tenure	% Split - FH	% Split - SR	% Split - SO	First Homes	Social Rent	Shared Ownership
1 Bedroom	5-10%	30%	17%	0	2 - 3	0
2 Bedrooms	25-30%	28%	55%	1	2 - 3	1
3 Bedrooms	40-45%	33%	26%	1	3	0
4+ Bedrooms	20-25%	9%	1%	1	1	0
				3	9	1

I am unclear from the site plan provided which homes are the affordable homes, the applicants states that a pepper-pot approach to the distribution of the affordable homes has been adopted, this is welcomed, when the revised unit mix has been re-considered it would be useful to see a revised site plan confirming the location of the affordable homes.

The Council recommend that all affordable housing dwellings should be developed to Building Regulations M4 (Category 2) 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 will assess all affordable housing development proposals against the Nationally Described Space Standards (updated March 2015), as in table 4 below. To ensure dwellings are suitable for future occupants, all bedrooms should provide a minimum of 2 bed spaces, so for example a 2 bedroom unit should provide 4 bed spaces, 3 bedrooms should provide a minimum of 6 bed spaces, etc.

Number of Bedrooms	Number of bed spaces (persons)	1 storey dwelling (m²)	2 storey dwelling (m²)	3 storey dwelling (m²)
1	2p	50	58	
2	4p	70	79	
3	6р	95	102	108
4+	8p	117	124	130

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.

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 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 pub 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.

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

Kind regards

Emma Craig Housing Development Officer

Table 4