

CABINET (LOCAL DEVELOPMENT FRAMEWORK) COMMITTEE

5 February 2008

WINCHESTER DISTRICT DEVELOPMENT FRAMEWORK - AFFORDABLE HOUSING
SUPPLEMENTARY PLANNING DOCUMENT

REPORT OF THE HEAD OF STRATEGIC PLANNING

Contact Officer: Simon Maggs/Margaret Kirby Tel No: 01962 848 203 email
smaggs@winchester.gov.uk / 01962 848170 email mkirby@winchester.gov.uk

RECENT REFERENCES:

CAB 1264 - Affordable Housing Development Guidelines, 31 May 2006

CAB 1389 - Local Development Scheme 2007, 17 January 2007

CAB 1399 - Winchester District Development Framework – Affordable Housing
Supplementary Planning Guidance, 7 February 2007

EXECUTIVE SUMMARY:

Local Plan policy H.5 provides the Council with the policy framework to negotiate new affordable housing in association with certain market housing development. In May 2006 the Council adopted its Affordable Housing Development Guide. This sets out in detail the Council's affordable housing objectives and how it aims to achieve them.

In order to increase the weight that can be attached to the guidance as a material planning consideration it is necessary to develop the Guide into a formal Supplementary Planning Document. A draft document was published for consultation in 2007. This has been amended, taking into account the consultation exercise and the Strategic Housing Market Assessment.

RECOMMENDATION:

That the Supplementary Planning Document be adopted as planning policy, subject to adjustment of the commuted sums table as set out in paragraph 1.8 of the report.

CABINET (LOCAL DEVELOPMENT FRAMEWORK) COMMITTEE

5 February 2008

WINCHESTER DISTRICT DEVELOPMENT FRAMEWORK – AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

Report of the Head of Strategic Planning

DETAIL:

- 1.1 Enabling new affordable housing to be provided is amongst the Council's key priorities.
- 1.2 One of the principal ways of ways of doing this is through the application of Local Plan Policy H.5 which requires, on suitable sites, a proportion of housing to be set aside as affordable housing. This is achieved through negotiation with land owners and developers.
- 1.3 In May 2006 the Council adopted its Affordable Housing Development Guide (AHDG). This has been widely commended by a range of bodies including registered social landlords, developers and the Audit Commission. This sets out in detail how Policy H5 will be implemented. In order to increase the weight that can be attached to the guidance as a material planning consideration it is necessary to develop it into a formal Supplementary Planning Document (SPD). The intention to produce the SPD is included within the Local Development Scheme 2007 that was approved at January 2007 Cabinet for submission to the Government Office for the South East.
- 1.4 The draft SPD was published for consultation in May 2007. A Statement of Participation is attached as Appendix B. Written comments were received from 14 organisations and individuals. An analysis of the comments can be found in Appendix C.
- 1.5 The SPD (Appendix A) has now been redrafted taking account of comments received and the recently published Strategic Housing Market Assessment. The revised document has been endorsed by the Winchester Housing Board.
- 1.6 The SPD sets out issues and policies that landowners, developers and affordable housing providers need to take into account when seeking to develop sites to which Policy H5 applies. It does not cover other circumstances, for instance rural exception site development.
- 1.7 The SPD prioritises the provision of homes for social rent, although other forms of affordable housing is also encouraged. There is also a high priority placed on ensuring that new affordable housing is of a high quality and contributes towards sustainability. This includes ensuring homes are built to high environmental standards (currently Code for Sustainable Homes 3 as a minimum) and placing emphasis on the provision of family accommodation. Appendix 1 to the Document, the *Affordable Housing Quality Framework*, provides detailed guidance on improving standards of development based around the Code for Sustainable Homes.

- 1.8 The figures contained in the commuted sum table are based on historic costs. It would be advisable to update them immediately prior to publication based on the latest available figures. It is recommended that the sums are adjusted by applying the appropriate Nationwide Housing Price Index figure.
- 1.9 It is important to note that the SPD has been prepared so it is in conformity with the adopted Winchester District Local Plan Review. Therefore, it does not, and indeed cannot, cover all the matters that will be considered as part of the Local Development Framework (LDF) Issues and Options consultation exercise. In the future it will be necessary to revisit the SPD to update it to be in conformity with the LDF. However, in order to clarify and strengthen the Council's planning policy position, it is considered crucial to have an adopted SPD in place as soon as possible.

OTHER CONSIDERATIONS:

2 CORPORATE STRATEGY (RELEVANCE TO):

- 2.1 The implementation of the guidance contained in the document will help support all the Council's corporate priorities. For instance, *Safe and Strong Communities* by enabling, and improving access to, affordable housing; *Economic Prosperity* by ensuring an adequate housing supply; *High Quality Environment* by using the planning system to enable the provision of homes to meet local needs and assisting others to reduce greenhouse gas emissions; and *An Efficient and Effective Council* by working with partner organisations to deliver quality of life improvements.

3 RESOURCE IMPLICATIONS:

- 3.1 Other than the costs of SPD production, which will be met from within existing budgets, there are no direct resource implications as a result of this paper. However, on occasions the Council does assist directly in the funding of affordable housing development. This guidance will limit the levels of this assistance needed by helping control the values of affordable housing land. Enabling affordable housing also limits the need to accommodate households in other forms of accommodation, for instance temporary accommodation, which are a cost to the Council.

BACKGROUND DOCUMENTS:

Winchester District Local Plan Review (2006)

Winchester City Council Affordable Housing Development Guide (2006)

Draft Affordable Housing Supplementary Planning Document (2007)

Strategic Housing Market Assessment (2007)

APPENDICES:

Due to their size, the Appendices have been sent to Cabinet, Group Leaders, and Chairmen of Principal Scrutiny Committee, Environment Scrutiny Panel and Planning Development Control Committee only. It is also available to view on the Council's Website by following links to Cabinet (LDF) Committee from the following page and a copy has been placed in the Members' Library:

<http://www.winchester.gov.uk/CouncilAndDemocracy/DemocracyAndElections/Committees/>

Appendix A - Affordable Housing Supplementary Planning Document

Appendix B - Statement of Participation

Appendix C - Analysis of Comments on Written Consultation

Appendix D - Sustainability Appraisal

Winchester City Council

Affordable Housing Supplementary Planning Document

Delivering Affordable Housing on sites where planning policies require part of a development to be set aside for affordable housing.

Contents

	Page No.
Executive Summary	2
Preface	4
Part 1 Background and Priorities	5
Part 2 Detailed Guidance	15
Part 3 Glossary	26

Appendices

1. Affordable Housing Quality Framework
2. Affordable Housing Commuted Sums Table

Contacts

Planning Development Control
 01962 848565/ 848290
planning@winchester.gov.uk

Strategic Planning
 01962 848170
ldf@winchester.gov.uk

Housing Development Team
 01962 848210 / 848218 / 844368
strategichousing@winchester.gov.uk

Particular Needs

If you have any particular needs which affect how you are able to use or be involved in our services or how you would like to receive information – for example translation, interpreters, Braille, audio tape, large print, sign language – please contact the Customer Service Centre.

By Telephone: 01962 840 222

By Email: customerservice@winchester.gov.uk

Executive Summary

Housing affordability is one of the biggest challenges facing the District. Local communities continually identify the high cost of housing as being one of the most serious problems in the area. It would need most of the new homes that are planned to be built in the district to be affordable if housing needs were to be met. However, not only do we need more affordable housing, it needs to be the right kind of housing and of the right quality.

Increasing the supply of affordable housing is one of the most important local priorities and its provision is more important than the provision of other forms of housing.

This document is a guide to the affordable housing development process to ensure that the right kind of high quality affordable housing is provided on sites where planning policies (District Local Plan Review (Adopted July 2006) Policy H.5) require part of a development to be set aside for affordable housing.

The overarching aim of this Supplementary Planning Document is to improve the supply of affordable homes and meet local needs. With the priorities being to meet council objectives by:

- 1. Providing additional social rented housing.**
- 2. Promoting the provision of high quality affordable housing that contributes towards sustainability, provides a suitable range of housing types and sizes, and helps create mixed and balanced communities.**

The document contains a series of policies that set out in detail what is required from developments. Developers and landowners are advised to discuss potential schemes with the Council at a very early stage so they can gain a full appreciation of what will be expected on an individual site.

Supplementary Planning Document Policy Summary

Policy 1: A variety of affordable dwelling types and sizes should be provided to meet the wide range of identified housing needs.

Policy 2: Priority is given to the provision of affordable housing for social rent. Where 5 or less affordable dwellings are to be provided all should be for social rent. Any additional affordable dwellings provided should be split evenly between social rented and intermediate tenures.

Policy 3: Affordable housing should be well integrated with market housing, in a way which results in different kinds of housing being in

close proximity to each other. Large groupings of single tenure dwellings or dwelling types should be avoided.

Policy 4: Affordable housing should be indistinguishable from market housing in terms of appearance and meet the design standards set out below.

Policy 5: Provision should, preferably, be by a partner RSL, although an alternative provider may be agreed with the Council, provided the requirements set out below are met.

Policy 6: Affordable housing land should be made available clean and serviced, and at nil cost. Reasonable build costs can be required.

Policy 7: Affordable housing should be reserved for households identified as being in housing need and registered on one of the Council's housing registers or a register, such as the Zone Agent's register, approved by them. Nominations will be made by the Council from those registers.

Policy 8: Affordable housing should be provided on-site, except as set out below.

Policy 9: The affordable housing that is provided must be available for as long as the need exists.

Policy 10: Service charges should not render dwellings unaffordable.

Policy 11: Affordable housing should be delivered free of public subsidy, unless the use of subsidy would improve the numbers or mix of dwellings, in which case the level of subsidy needed should be minimised.

Policy 12: Affordable housing will be secured through a planning obligation.

Policy 13: An Affordable Housing Statement should accompany a planning application.

Preface

Housing affordability is one of the biggest challenges facing the District.

Local communities continually identify the high cost of housing as being one of the most serious problems in the area. These views are backed up by research and a robust evidence base. In 2006 an income of around £ 8 50,000 was needed to buy ~~the average home cheapest homes~~. There has been an increase of over 50% in the number of households on the Council's Housing Register since 2001, and it would need most of the new homes that are planned to be built in the district to be affordable if housing needs were to be met. ~~if, up to 2011, every new home that was built was an affordable home there would still not be enough homes to meet existing and newly arising need.~~

It goes without saying that good quality homes are needed for everyone as basic shelter. But it is important to remember that inadequate housing can lead to a whole range of problems and inequalities, including health, environmental, economic prosperity (both of individuals and spatially), educational attainment, and family cohesion. This means that not only are there personal consequences of inadequate housing, there are also costs to society.

Increasing the supply of affordable housing is one of the most important local priorities and its provision is more important than the provision of other forms of housing.

However, not only do we need more affordable housing, it needs to be the right kind of housing and of the right quality. The Council will encourage innovative development and the adoption of best practice, in particular Building for Life principles.

~~This document is a is intended to guide the development process to ensure that the right kind of high quality affordable housing is provided on sites where planning policies require part of a development to be set aside for affordable housing.~~

PART 1 Background and Priorities

Purpose of the Supplementary Planning Document

- 1.1 This Supplementary Planning Document (SPD) provides details of how affordable housing needs should normally be addressed on sites where planning policies require an element of the housing to be affordable¹.
- 1.2 The SPD is based on policies contained within the adopted Local Plan and it is considered necessary in order to add certainty and clarity to the affordable housing development process. The only other realistic option is to *do nothing* and this would be likely to lead to difficulties in achieving planning and housing objectives.
- 1.3 The SPD applies to all housing development irrespective of whether public subsidy will be involved in the provision of affordable housing.
- 1.4 The requirements in this document (and the Local Plan and Housing Strategy²) should be taken into account when considering acquiring or developing a site. Landowners, developers and agents should discuss affordable housing issues with the Council at an early stage.
- 1.5 In view of the scale of the District's affordable housing problem it is important that all suitable sites provide on-site, affordable housing. This includes sites which owners and developers propose be used for sheltered or other specialist housing. In land use terms if a site is suitable for housing, then it is also suitable for the provision of affordable housing. Developers and architects should regard the need to provide affordable housing as a key driver in determining how, and for what, a site should be developed.
- 1.6 By following the guidance and discussing proposals with the Council, the time it takes to determine a planning application will be minimised and the probability of success increased.
- 1.7 **A planning application that does not comply with local planning policy will be refused.**
- 1.8 A Sustainability Appraisal has been carried out to ensure that this SPD supports sustainable development in the Winchester District. A Statement of Participation has also been prepared. These are available as separate documents and can be viewed at www.winchester.gov.uk.

¹ The guide does not apply to rural exception sites where affordable housing may be allowed as an exception to usual planning policies.

² www.winchester.gov.uk

Housing Needs and Policy Background

Housing Needs in Winchester District

- 1.9 In 2001 Winchester City Council commissioned DCA Ltd to undertake a Housing Needs Survey to update the need for affordable housing in the District. This Survey was published in 2002, identifying a significant overall annual shortfall of 779 affordable dwellings, confirming the significant need for affordable housing in the District.
- 1.10 Area based Housing Market Assessments that cover part of the District, namely the West of Waterlooville Major Development Area and the part of the District that lies within the South Hampshire Sub-Region were carried out in 2005 and 2006. These assessments support the need for affordable housing provision.
- 1.11 ~~The 2002 DCA Housing Needs Survey currently provides the most up-to-date comprehensive survey information, pending the Central Hampshire/New Forest Housing Market Assessment in 2007. In 2007 the Council together with several other Hampshire Local Authorities commissioned a sub-regional Strategic Housing Market Assessment³ This Assessment will provides more up-to-date information on housing need in the District, however, while some of its conclusions and recommendations will inform this SPD, due to planning regulations others can only be addressed through the preparation of documents for the Local Development Framework process.~~
- 1.12 The Strategic Housing Market Assessment highlights a priority need for social rented housing, together with a more modest need for intermediate affordable housing. It concludes that there will be a requirement for some 440 affordable units (of which at least 380 should be social rented) to be provided annually. This number are likely, however, to be an underestimate due to the difficulties in assessing current hidden need e.g. those households in need but not registered on a housing register or waiting list.
- 1.13 Based on the housing target of 612 dwellings per annum (South East Plan Panel Report 2007) and an annual affordable housing requirement of 440 units this represents about 72% of provision, compared to about 14% which has actually been delivered in recent years.
- 1.14 It is clear therefore there is a need for a range of affordable housing sizes, including family accommodation While headline figures in the Strategic Housing Market Assessment (SMA) indicate that the majority of social rented affordable housing need is for smaller homes, this must

³ www.winchester.gov.uk

be viewed in the context of allocation policies that restrict households to particular housing types and sizes. If households in need of affordable housing were allowed to occupy the same amount of space as those in market housing the greatest need would be for 2 and 3 bed properties. This data also ignores the pattern of re-lets that sees smaller properties being re-let most frequently. The HMA indicates that taking account of this factor the greatest need is for 1 bed and 3 bed homes. However, the study warns against over-delivery of 1 bedroom properties. These are the least flexible dwellings and building in extra space in the social rented stock would have benefits in terms of limiting further polarisation developing between this and the market sector. The costs of providing an extra bedroom can be marginal and the benefits in terms of flexibility and the stability of communities significant.

1.15 The greatest demand for intermediate affordable housing is for 2 bed properties..

1.16 The Council holds a Housing Register that provides up to date information on households seeking affordable housing. There are currently around 2750 households on the register (Dec 2007). The Housing Corporation's Zone Agents (Swaythling Housing Society) operate the Council's Low Cost Home Ownership Intermediate Affordable Housing Register. There are currently ~~280~~ 760 households registered on this.

Government Planning Policy on Affordable Housing

1.137 Government policy on affordable housing is now contained in **Planning Policy Statement 3 (PPS 3) on Housing**, supplemented by advice in "**Delivering Affordable Housing**", both published in November 2006. They supersede the earlier Planning Policy Guidance Note 3, and Circular 6/98 on Planning and Affordable Housing.

1.148 A substantial amount of the advice on affordable housing in PPS 3 is directed towards the new planning system, with Strategic Housing Market Assessments being produced to inform Regional Spatial Strategies and Local Development Documents within the Local Development Framework.

1.159 PPS3 does, however, emphasise the key role of the planning system in securing the delivery of new affordable housing (paragraphs 27 – 30) and, until replaced by relevant Local Development Documents, this will continue to be achieved through affordable housing policies in the Local Plan Review, which is a "saved plan" within the District's Local Development Framework.

1.4620 The PPS reflects the Government's main aims for affordable housing, to provide everyone with an opportunity for a decent home which they

can afford, within a sustainable mixed community. The PPS refers to strategic policy objectives (in paragraph 9), to provide a wide choice of high quality homes, both market and affordable, to meet the needs of the whole community in terms of tenures and price ranges. The Government's affordable housing policy is therefore based around 3 themes:

- Providing high quality homes in mixed sustainable communities for those in need;
- Widening the opportunities for home ownership;
- Offering greater quality, flexibility and choice to those who rent.

1.4721 Advice on the nature and provision of affordable housing includes a definition of **affordable housing** which the Government has adopted:

“Affordable housing includes social-rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- *Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.*
- *Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative housing provision.”*

1.4822 The PPS recognises that affordable housing can take more than one form:

Social rented housing is defined as:

“Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. ...it may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant”.

Intermediate affordable housing is defined as:

“Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products, other low cost homes for sale and intermediate rent”.

1.4923 The PPS clarifies that the definition of affordable housing can include homes provided by private sector bodies or provided without grant funding, whereas ‘low cost market’ housing will not be considered, for planning purposes, as affordable housing.

- 1.204 The PPS emphasises the need for a good mix of tenures, with affordable housing provided as an integral part of sustainable mixed communities, in both urban and rural areas.
- 1.245 The strong presumption is that affordable housing will be provided on the application site so that it contributes towards creating a mix of housing. However, where robustly justified, off-site provision or a financial contribution may be accepted as long as the agreed approach contributes to the creation of mixed communities in the City Council area and achieves a benefit at least equivalent to on-site provision.
- 1.226 The document **Delivering Affordable Housing** is published to be read in conjunction with PPS 3, and aims to support local authorities and others *“in delivering more high quality affordable housing within mixed sustainable communities by using all the tools available to them”*. It provides more detailed information on the roles of local and national government, different types of affordable housing, affordable housing providers, the HomeBuy scheme, and provision of grant and developer contributions.

Regional Spatial Strategy

- 1.27 The South East Plan is the Regional Spatial Strategy covering South East England, providing the statutory regional framework for the area, and the context within which Local Development Documents will be prepared. It covers the 20 year period 2006 – 2026.
- 1.28 The Plan submitted to Government in March 2006 contained a core set of principles that were used to guide its development. This included the need for a substantial increase in the supply of appropriate affordable housing, and for a package of measures to deliver that goal.
- 1.29 Policy H4 of the Plan requires Local Development Documents to set targets for the provision of affordable housing, based on assessments of need and demand set out in strategic housing market assessments. This will need to have regard to the overall regional target that 25% all new housing should be social rented accommodation and 10% should be other forms of affordable housing.
- 1.30 The Examination in Public of the South East Plan was held November 2006 – March 2007, and the Panel Report was published and submitted to the Secretary of State in August 2007. The Panel Report endorses the need for increased provision of affordable housing through the planning system.
- 1.31 The South East Plan establishes that the need to provide affordable housing in the District is certain to continue into future years. The Plan will, when adopted, provide a new spatial framework for the region, but until that time the Hampshire County Structure Plan provides the broad strategic background for the District.

Development Plan Policies and Local Plan Strategy

1.2332 The Hampshire County Structure Plan 1996 – 2011 and the adopted Winchester District Plan Review 2006 together form the statutory development plan for the District. Both contain policies requiring the negotiation of an element of affordable housing on development sites which include housing.

1.2433 The Local Plan's overall aim is:

To guide development in the District to meet the needs of the local community and the strategic responsibilities imposed on the Local Planning Authority, to ensure that necessary development is located, designed and implemented to protect and enhance the character of its setting, to help sustain a buoyant local economy and to avoid the wasteful use of resources.

1.2534 A key objective of this aim is:

To promote development which meets local needs, particularly for housing which is affordable and of an appropriate type and tenure, as well as to meet local business, shopping, leisure and facility needs.

1.2635 The more recent definition of affordable housing is in PPS 3 and is consistent with the principles of the definition set out in the Local Plan. The PPS definitions are, however, more generalised as they are intended to apply nationally.

1.2736 ~~The 2002 Housing Needs Survey identified a significant need for affordable housing in the District and the Local Plan recognises that it would not be possible to meet all the need in the Plan's timescale. The City Council therefore aims to maximise the provision of affordable housing on suitable sites, by seeking the maximum achievable target level of affordable housing from new developments. The proportion sought varies within different parts of the District, but is up to 40% on suitable sites. The different proportions sought are set out in Policy H.5 and amplified in paragraphs 6.43 – 6.51 of the Local Plan.~~

1.2837 The Local Plan requires the affordable housing element of any housing scheme to be provided on-site as part of the housing development, and designed to provide a mix of sizes, types and tenures. However, the Plan allows for any part-units negotiated as a proportion of the total units to be accepted as an equivalent

financial contribution. Contributions would then be used to provide affordable housing in the locality. The Plan also allows for off-site contributions to be sought within the smaller settlements (of less than 3000 population), where they would be more effective in achieving affordable housing, having regard to site and viability considerations.

1.2938 The City Council needs to be satisfied that affordable homes will continue to be available to local people in need. The Local Plan therefore indicates that an effective way of achieving this is by involving a registered social landlord to develop and manage the scheme. The Plan also sets out the City Council's intention to negotiate an acceptable Section 106 obligation to control the occupancy of the homes.

Affordable Housing Requirements

District Local Plan Review (Adopted July 2006) Policy H.5

The Local Planning Authority will permit housing development on suitable sites where affordable housing forms:

- (i) – 40% provision within the defined built-up area of Winchester; and
 - 30% provision within the defined built-up areas of the other larger settlements;where 15 or more dwellings are proposed, or the site is 0.5 hectares or more;
- (ii) 40% provision within the Major Development Area at Waterlooville and the Strategic Reserve Major Development Areas at Waterlooville and Winchester City (North), if confirmed.
- (iii) 30% provision within the defined built-up areas of the smaller settlements and elsewhere in the District, where the site can accommodate 5 or more dwellings, or exceeds 0.17 hectares.
- (iv) 35%⁴ of the housing within the Local Reserve housing sites at:
 - Pitt Manor, Winchester;
 - Worthy Road/Francis Gardens, Winchester;
 - Little Frenchies Field, Denmead;
 - Spring Gardens, Alresford;should the need for the release of any of these sites be confirmed.

⁴ Para 6.58 of the Local Plan Review indicates that these sites should provide a minimum of 35% of the housing as affordable dwellings if the release of any of the four sites is required as the result of the annual monitoring of housing supply in the District.

The number, type and tenure of the affordable dwellings will be negotiated for each development, taking into account the need for affordable housing, market and site conditions, and other relevant factors.

The Local Planning Authority will need to be satisfied that appropriate arrangements are in place to ensure that the affordable housing remains genuinely available to those in housing need as long as the need exists (subject to any statutory provisions).

Affordable Housing Development Guide

- 1.3039 The Guide was adopted by the Council's Cabinet in 2006. It provides details of how affordable housing needs should normally be addressed on sites where Local Plan Policy H.5 requires affordable housing to come forward as part of development proposals. The Guide was adopted as an interim measure pending the production of SPD and is superseded by this document.

South East Regional Housing Strategy

- 1.3140 This Strategy, published in 2006, has as a priority the need to build more affordable homes, recognising that the need is most acute for social rented housing. It also states there is a need to encourage social cohesion, create sustainable communities and to promote good design and environmental sustainability. The 2007 draft replacement strategy promotes similar themes. In June 2007, in making recommendations to ministers on housing investment in the regions, the Regional Housing Board emphasised the need to prioritise investment in social rented homes. It also noted that the shift in recent years towards the construction of smaller homes is meaning that the needs of families are not being adequately met, and that stock is consequently less flexible. The Board established targets for larger homes and announced it would be encouraging the provision of houses wherever possible.

Winchester Housing Strategy

- 1.3241 The Council's Housing Strategy was adopted in 2004. It will be reviewed in 2008, following the completion of the aforementioned Housing Market Assessment. The Strategy identifies the need to provide more affordable housing as its top priority. It explains that while a significant proportion of households in housing need aspire to some form of home ownership, because of prices and incomes this is only a reality for a minority. This means that while a range of new affordable housing tenures need to be provided, the emphasis is on homes for social rent. The Strategy also identifies the need to meet a range of housing needs, create mixed, diverse, dynamic

communities and see affordable housing being built in small pockets on larger private development sites.

The Community Strategy

1.3342 The Community Strategy, adopted by the Winchester District Strategic Partnership in 2007, indicates that house prices are well beyond the reach of many households and that this has far reaching implications for the sustainability of the area. It acknowledges the contribution affordable housing makes to economic prosperity and social inclusion and that it is necessary to meet housing needs of all sectors of the community. It has as a priority the need to improve the supply of affordable homes. Following extensive consultation, Winchester Housing Board (which provides housing support to the Local Strategic Partnership) has made improving the supply of affordable homes and meeting local needs its top priority.

Aim: To improve the supply of affordable homes and meet local needs.

The Priorities

1.3443 The vast majority of households on the housing registers need, and can only realistically afford, social rented housing. The priority is, therefore, the provision of social rented housing.

Priority 1: To meet Council objectives by providing additional social rented housing.

1.3544 It is, however, important that other forms of affordable housing are provided in order to establish mixed and balanced communities and to avoid polarisation. For this reason, in appropriate circumstances, as set out below, intermediate affordable housing will be promoted as part of mixed tenure schemes.

1.3645 There is a need for a range of types of housing; small dwellings, family housing, bungalows for older people for instance. Development will need to reflect this range of needs and take account of the flows that can be created in the housing stock by building particular kinds of units. It must also take account of the sustainability benefits of providing a range of housing types and sizes. Most developments will be expected to provide a range of housing sizes and/or types,

including a significant proportion of family homes. The Housing Development team will be able to provide advice on individual schemes.

- 1.3746 Quality and sustainability are ~~also~~ key priorities and it is crucial that these issues are taken into account in designing new developments. New dwellings must be of a high quality, contribute towards the creation of mixed, sustainable communities and be of a size and type that meet housing needs.

Priority 2: To meet Council objectives by promoting high quality affordable housing that contributes towards sustainability, provides a suitable range of housing types and sizes, and helps create mixed and balanced communities.

Part 2 Detailed Guidance

- 2.1 This section sets out a series of policies and principles that should guide the design and development process, and all these policies supplement Policy H.5 of the Local Plan Review (WDLPR). Some policies, however, also supplement other WDLPR policies, and this is indicated where appropriate.
- 2.2 It is essential that affordable housing requirements are considered at the outset of the design process. Details of how affordable housing requirements have been taken account of should be contained within the design statement and an Affordable Housing Statement (see Policy 13 below) should be prepared.
- 2.3 Discussion with the Council on affordable housing issues should be an integral part of pre-application discussions.

1. What type and size of dwellings should be provided?

Policy 1: A variety of affordable dwelling types and sizes should be provided to meet the wide range of identified housing needs.

(also supplements WDLPR Policy H.7)

- 2.4 Though in absolute terms single people form the highest number of households on the Housing Register, families with children often have to wait longer for homes. The 2007 Strategic Housing Market Assessment identifies particular pressures on 3 bedroom stock. Providing larger homes can also help families living in overcrowded conditions in smaller accommodation move to more suitable accommodation and free up a smaller home for a single person. On occasions there may be need for more specialist accommodation, such as bungalows, and sometimes these will need to be wheelchair accessible.
- 2.5 The mix of housing required on individual sites will be determined by the local planning authority taking account of local affordable housing needs and the character of the remainder of the development and neighbourhood. The affordable housing element will be of a similar size and character to the market dwellings on the development site, unless identified housing needs indicate an alternative dwelling type is required. Unless identified housing needs indicate an alternative dwelling type is required, the affordable housing element should be of a similar size (in terms of bedrooms) and character to the market dwellings on the development site. For instance, where 45% of the market homes are 3 bed or larger, 45% of the affordable homes should be 3 bed or larger. As noted in Part 1, 1 bed properties are the least flexible types of dwellings. There will, therefore be a preference for the

provision of modestly sized 2 bedroom properties (with 3 bedspaces) rather than 1 bedspace properties.

- 2.6 Most developments will be expected to provide a range of housing sizes and/or types, including a significant proportion of affordable family homes. As a general rule smaller homes, including flats, are more likely to be acceptable in city centre locations (if flats are being provided as part of the market element), whereas in the suburban parts of the City and beyond ~~the City~~ there will be a greater emphasis on houses. Houses rather than flats are strongly preferred as family homes and, for reasons of affordability, there will be an emphasis on providing family houses for social rent rather than as intermediate affordable homes. The Housing Development team will be able to provide advice on individual schemes.
- 2.7 The precise mix must be agreed with the Council, but Local Plan Policy H.7 requires that at least 50% of the total number of dwellings (market and affordable) will be either 1 or 2 bed⁵. In applying this policy regard must be had to the desire to provide a range of dwelling sizes, so, for instance, there is not a disproportionately large proportion of affordable 1 bed dwellings on a site.
- 2.8 1 bed properties ~~should have be able to accommodate 2 bedspaces people, 2 beds 4 bedspaces (other than those provided at the expense of 1 bed properties which may be permitted to have 3 bedspaces) people, 3 beds 5 people bedspaces -~~, 4 beds a minimum of 6 bedspaces people.⁶

2. What tenure is required?

Policy 2: Priority is given to the provision of affordable housing for social rent. Where 5 or less affordable dwellings are to be provided all should be for social rent. Any additional affordable dwellings provided should be split evenly between social rented and intermediate tenures.

- 2.9 Where more than 5 affordable dwelling are proposed then, unless there are local reasons that suggest otherwise, such as housing need or neighbourhood tenure mix, the split between any affordable dwellings over 5 should be 50% social rent, 50% intermediate affordable housing (provided the dwellings are considered affordable).

⁵ See District Local Plan Policy H.7 www.winchester.gov.uk/planning

⁶ Winchester Affordable Housing Quality Framework (Appendix 1); Housing Quality Indicators (www.communities.gov.uk/housing)

- 2.10 The City Council will determine the tenure mix within the intermediate affordable housing element by reference to the Affordability Test⁷ and relative housing need. Intermediate affordable housing will normally take the form of shared ownership or equity homes. Providers will need to ensure that rental charges on any unsold equity do not render the homes unaffordable and also that the equity share is sufficiently low to be attractive to the Council's identified target market. In some cases, with the Council's agreement, again taking account of affordability and relative need, other forms of intermediate housing may be permitted, for instance intermediate rent.
- 2.11 In accordance with PPS3 and the District Local Plan Review low cost market housing is not considered to be affordable housing within the district.

3. How should the layout be designed?

Policy 3: Affordable housing should be well integrated with market housing, in a way which results in different kinds of housing being in close proximity to each other. Large groupings of single tenure dwellings or dwelling types should be avoided.

(also supplements WDLPR Policy DP.3)

- 2.12 As a guide, there should normally be no groupings of more than 5 affordable dwellings, except where they are provided in flats, when a higher number may be appropriate. However, rather than simply "design by numbers" in applying this guide figure, account will be taken of the overall design philosophy underpinning the scheme and the need to meet its functional requirements, for instance communal private spaces for flats.
- 2.13 In designing a scheme it is important to take account of the value that informal resident interaction has on creating a sustainable community. Opportunities for interaction can be created in several ways, for instance through the use of well designed and located open space, communal space and footpaths. The attention that developers pay to such issues will be important in judging the acceptability of a scheme.
- 2.14 Where a design code is being prepared this should reflect these objectives.
- 2.15 The principles of Secured by Design should be adopted and schemes should be eligible for the award.

⁷Affordability Test: In this context the aim should be to ensure housing costs (mortgage (at a lender's standard variable rate), rent & service charge) account for 30% or less of the median gross annual household income of residents on the Zone Agent's Register. For the purposes of this calculation 1 bed affordability will be calculated on the basis of single person households, the affordability of 2 bed dwellings or larger, on the basis of 2 person households (or larger).

- 2.16 If a developer's design means that the required form of affordable housing cannot be accommodated then the proposals should be redesigned to allow provision.

4. Are there any dwelling design requirements?

Policy 4: Affordable housing should be indistinguishable from market housing in terms of appearance and meet the design standards set out below.

(also supplements WDLPR Policy DP.3)

- 2.17 Dwellings should ~~be built to Lifetime Home Standards⁸~~, meet Housing Corporation Design and Quality Standards⁹ and achieve, at least, Code for Sustainable Homes Level 3¹⁰ (or equivalent Housing Corporation requirements to secure funding). In doing so they must also achieve acceptable Housing Quality Indicator and Building for Life scores. Winchester's Affordable Housing Quality Framework sets out local agreed standards aimed at ensuring customer satisfaction. Developers should work to these standards and to individual Registered Social Landlord (RSL) design briefs. Dwellings should be built to Lifetime Home Standards¹¹ unless there are demonstrable reasons why this cannot be achieved on a particular site.
- 2.18 Again, if a developer's design means that the required form of affordable housing cannot be accommodated then the proposals should be redesigned to allow provision.

5. Who will provide the affordable housing?

Policy 5: Provision should, preferably, be by a partner RSL, although an alternative provider may be agreed with the Council, provided the requirements set out below are met.

- 2.19 The preferred provider should be identified at an early stage so they can be involved in the design process. The Housing Development Team will advise on which partner RSL is best placed to become involved in a scheme.
- 2.20 Alternative providers (for instance non-partner RSLs or developers) will be considered if they agree to the Council's nomination requirements, can demonstrate, to the Council's satisfaction, suitable long term management, community development and involvement arrangements,

⁸ www.jrf.org.uk

⁹ www.housingcorp.gov.uk

¹⁰ www.communities.gov.uk

¹¹ www.jrf.org.uk

have been approved by the Housing Corporation as ~~an accredited landlord~~ and have been awarded 4 Green Traffic Lights as part of the Housing Corporation Assessment (or comparable assessment). This will allow Winchester's needs for affordable housing to be effectively tackled and ensure providers can work with the Council to create sustainable communities.

Working with partner RSLs or other providers means:

- There is no need for developers to seek prior approval for affordable housing providers or managers, other than agreeing which partner to work with;
- Council support for discussions with the Housing Corporation, and;
- There is no impact on how planning permissions for market homes are implemented as partner RSLs have funds available to implement schemes, irrespective of grant availability, at the time a developer wishes to build.

2.21 Subject to any Housing Corporation rules that may prohibit this, providers should agree to recycle developer subsidy and capital receipts from staircasing, Right to Acquire or Social HomeBuy acquisitions into the provision of more affordable housing in the City Council area.

~~Non-partner RSLs or other providers must be approved by the Council. Where they are proposed as landlords a statement should be submitted to the Council providing details of:~~

- ~~The accountability of the organisation~~
- ~~Resident involvement~~
- ~~Community development~~
- ~~Sustainable management arrangements~~
- ~~Service delivery~~
- ~~Track record~~
- ~~Agreement to the Council's nomination arrangements and the recycling of receipts.~~
- ~~References~~

6. How will the affordable housing be provided?

Policy 6: Affordable housing land should be made available clean and serviced, and at nil cost. Reasonable build costs will ~~can~~ be required.

- 2.22 Land owners will be required to transfer clean, serviced land to the affordable housing provider that is sufficient to accommodate the required affordable housing at nil-cost. Land should be serviced to the site boundary.
- 2.23 The affordable housing provider will then be responsible for the construction of the dwellings. In some cases a build contract will ~~may~~ be agreed with the developer of the market units. The price negotiated should reflect the build cost not the property value and relate to the Royal Institute of Chartered Surveyors Building Cost Index. In the interests of affordability and to ensure value for money in terms of public investment only reasonable build costs may be required of a RSL or other provider. If necessary, arbitration measures will be adopted.
- 2.24 Where flats are to be transferred as part of a mixed tenure block the cost of transfer should reflect the subsidy that would have been provided by the application of the Council's nil value land transfer approach. Servicing should be up to the front door of each dwelling.
- 2.25 Due to high values and the level of affordable housing sought by Local Plan Policy H.5 it is not expected that requirements will render development proposals unviable. Where a developer does wish to contend that requirements make a scheme unviable an open book approach must be adopted and the claim substantiated by detailed evidence that allows viability to be tested. Developers should consider fully the financial implications of affordable housing provision before acquiring land. Failure to do so will not be accepted as justification for departing from planning policy.
- 2.26 Land for housing should be transferred freehold. In the case of flats a lease of a minimum of 125 years would be appropriate.
- 2.27 Where the developer is to construct the affordable housing prior approval of a programme and timetable for implementation will need to be obtained from the Council.

7. Who will live in the dwellings?

Policy 7: Affordable housing should be reserved for households identified as being in housing need and registered on one of the Council's housing registers or a register, such as the Zone Agent's register, approved by them. Nominations will be made by the Council from those registers.

(also supplements WDLPR Policy E.3)

- 2.28 Nominations of eligible households will be made to all dwellings from the Council's housing registers, or, with agreement, registers held by RSLs and Zone Agent. This provides an objective, open and accountable way of allocating properties.
- 2.29 The RSL or other provider will be required to accept nominations that have been made in accordance with appropriate allocations policies.
- 2.30 While the need for housing for key workers is an issue of strategic relevance, the Council does not normally expect developers or landowners to require the occupation of affordable housing to be restricted to this particular client group. It is important that the Council retains the flexibility to use affordable housing in a way that best meets local priorities. The provision of housing for key workers will normally be dealt with through allocation policies taking account of Government funding requirements.
- 2.31 Where employers wish to provide accommodation for their employees as part of a development proposal this should normally be in addition to the affordable housing provision. ~~In exceptional circumstances where there is a strong community benefit, and taking account of the economics of development and any special circumstances, the local planning authority may permit such housing to form part of the affordable element.~~ Other than in exceptional circumstances individual landowners will not be able to influence who occupies particular affordable homes unless the local planning authority agrees there are substantial community benefits or other special circumstances, in which case (subject to the local planning authority's agreement) part or all of the properties may be occupied in such a way.

8. Does the affordable housing need to be provided on-site?

Policy 8: Affordable housing should be provided on-site, except as set out below.

- 2.32 Where the proportion sought (as a result of the application of Local Plan policies) would result in a part of a dwelling being required (e.g. 10.2) then a financial contribution may be offered in lieu of that part (0.2). Details of the contribution required should be discussed with the

Housing Development Team at an early stage. Currently the contribution levels are based on those in Appendix 2, but these are revised annually. Developers should therefore seek advice from the Housing Development Team if this approach is to be used.

- 2.33 In smaller settlements¹² off-site contributions will be sought if this is a more effective way of achieving affordable housing provision (for instance greater numbers of dwellings, or better location), having regard to site and viability considerations.
- 2.34 Where an applicant wishes to displace all or part of the affordable housing requirement (whole dwellings only) to another site this will only be permitted where:
- a) ~~alternative provision is proposed that would allow priority housing needs to be better met~~ alternative provision is proposed that would allow priority needs to be better met and better support the creation of mixed and balanced communities, or;
 - b) provision on-site would necessitate an unacceptable level of alteration to a listed building.
- 2.35 In assessing whether alternative provision would be acceptable account will be taken of the affordable housing requirement that would also have been generated by the development of any alternative site ~~that is proposed and whether this is to be provided by the contribution of land or via a financial contribution.~~
- 2.36 Where an off-site contribution is accepted a developer should make a contribution of clean serviced land (in the same settlement, unless alternative provision would better meet needs) with the necessary planning permission at nil cost.
- 2.37 It is important that off-site provision does not compromise the aim of achieving mixed and balanced communities. It will not normally be acceptable to provide alternative land in areas where there is already a high concentration, or perceived high concentration, of affordable housing.
- 2.38 The Council will not accept offers by an applicant to buy into the existing housing stock as a way of providing affordable housing off-site, particularly if it is proposed to purchase into the existing supply of smaller and access-level market dwellings. By doing so the overall supply of smaller cheaper dwellings in the local housing market would be reduced. In terms of meeting overall housing needs in the District it is important that the existing pool of such dwellings is retained.

¹² Smaller settlements are those with a population of 3000 or less – details can be obtained from the Strategic Planning Team

- 2.39 Other than contributions for parts of dwellings, only in exceptional circumstances might a financial contribution be accepted in lieu of provision.

9. How long must the affordable housing that is provided be available for?

Policy 9: The affordable housing that is provided must be available for as long as the need exists.

- 2.40 For as long as the need exists. Given that the need for affordable housing greatly outstrips supply it is unlikely that this need will disappear.

10. How are service charges dealt with?

Policy 10: Service charges should not render dwellings unaffordable.

- 2.41 Levels should be discussed at an early stage. For social rented properties a benchmark of up to £8 per week for flats and £2 per week for houses (index linked to the Retail Price Index) will act as a guide. All items must be eligible for housing benefit or there should be an option to opt-out of non-housing benefit eligible items. Consideration could alternatively be given to an opt-in discount arrangement. The levels of service charges to be levied on intermediate affordable units will be taken into account of when applying the Affordability Test.

11. Will any public subsidy be available?

Policy 11: Affordable housing should be delivered free of public subsidy, unless the use of subsidy would improve the numbers or mix of dwellings, in which case the level of subsidy needed should be minimised.

- 2.42 The Housing Corporation expects that affordable housing should be provided on the type of sites covered by this SPD without the need for public subsidy. However, the Council recognises that in some cases subsidy will be needed in order to achieve additional housing objectives that could not be achieved without grant. In such circumstances the aims must be to minimise public subsidy requirements and ensure that any bids for grant are considered as good value for money by the Housing Corporation.
- 2.43 While, from time to time, limited local resources may be available, the Housing Corporation is likely to be the main source of public subsidy. The Council will only support bids for Housing Corporation subsidy by

partner RSLs or other providers it has agreed to work with, and provided it is satisfied with their proposals.

- 2.44 Subsidy is secured through a competitive process which is only open to certain affordable housing providers, most particularly RSLs. It is important that the Housing Corporation are involved in discussions at a very early stage on any schemes that may require subsidy. RSLs or other providers must involve the Council in discussions with the Housing Corporation.
- 2.45 In view of the competitive process for securing subsidy it is vital that requirements for subsidy are minimised, that it can be demonstrated that the subsidy would allow for either more affordable housing or a more appropriate mix, and that costs are not artificially inflated by subsidy, thus offsetting the benefit of free land.
- 2.46 In most cases partner RSLs are willing to forward fund schemes in anticipation of grant being received. This is a further reason for working with partner RSLs who have a long term commitment to the area. It maximises the chances of the desired scheme being achieved and ensures that grant availability has no impact on the development of the market homes.

12. Will a planning obligation be required?

Policy 12: Affordable housing will be secured through a planning obligation.

- 2.47 The heads of terms must be agreed prior to the submission of an application and a draft obligation (based on the City Council's model) submitted with the planning application.
- 2.48 Planning applications may be refused if the details and terms proposed for provision and management cannot, or the local planning authority believe will not, be agreed in a timely manner.
- 2.49 It is important to bear in mind that the model obligation only covers affordable housing issues and other common issues. There may be other planning requirements that need to be built into the obligation. These should be discussed with a planning officer at an early stage. Applicants will be expected to meet the Council's reasonable legal expenses.

13. What information should accompany a planning application?

Policy 13: An Affordable Housing Statement should accompany a planning application.

(also supplements WDLPR Policies DP.1 and DP.3)

2.50 An Affordable Housing Statement that should include:

- a schedule of the number, size and type (bedroom numbers and floorspace (gross internal area)) of dwellings. Both market and affordable dwellings should be clearly marked on a plan.
- a site layout plan showing the location of dwellings and the area of land to be transferred for affordable housing (including external spaces and areas that will not be transferred but to which rights of access will be granted e.g. parking courts, footpaths, play spaces, public open space);
- information relating to tenure;
- a statement indicating compliance with design standards, most particularly the Affordable Housing Quality Framework (Appendix 1) and Design and Quality Standards, and Code for Sustainable Homes, Building for Life and Housing Quality Indicator scores or ratings;
- a transfer statement or schedule detailing the transfer arrangements for land/dwellings, including details of where access/parking rights will exist, and;
- a statement accepting the terms of the affordable housing planning obligation.

Failure to provide a suitable Affordable Housing Statement may lead to a delay in determination of a planning application or a refusal.

Part 3 - Glossary

Affordable Housing	Housing provided with subsidy for people who are unable to resolve their housing requirements in the local housing market because of the relationship between housing costs and incomes.
<u>Affordability Test</u>	<u>Housing costs (mortgage (at a lender's standard variable rate), rent & service charge) should account for 30% or less of the median gross annual household income of residents on the Zone Agent's Register. For the purposes of this calculation 1 bed affordability will be calculated on the basis of single person households, the affordability of 2 bed dwellings or larger, on the basis of 2 person households (or larger).</u>
<u>Building for Life</u>	<u>Building for Life is a national benchmark for well designed neighbourhoods and homes that allows an assessment to be carried out of design quality. The Housing Corporation require minimum levels to be reached to make a scheme eligible for funding (www.buildingforlife.org)</u>
Clean and serviced land	Land free from any contamination which would prejudice the use of the land for affordable housing. Services include electricity, telephone, gas, water, foul and surface water drainage, cable television and other services.
Eligible households	Households who are registered by the Council as in need of affordable housing and unable to buy or rent suitable housing unassisted.
Housing Corporation	An executive agency of the Government that regulates and provides funding for affordable housing (www.housingcorp.gov.uk).
Design and Quality Standards	Sets out the Housing Corporation's requirements for all new homes which receive Social Housing Grant (www.housingcorp.gov.uk).
<u>Housing Quality Indicators</u>	<u>The Housing Quality Indicator system (HQI) is a measurement and assessment tool designed to allow housing schemes to be evaluated on the basis of quality rather than simply of cost. They are an important tool in assessing eligibility for Housing Corporation subsidy (www.communities.gov.uk/housing)</u>
Intermediate Affordable Housing	Housing at prices or rents above those of social rent but below market prices or rents. Housing can include shared ownership/equity (e.g. HomeBuy) or rented housing with rents typically 75% of market rent. <u>The requirements of the Affordability Test should be met.</u> Low cost market housing is not considered to be affordable housing.
Key Workers	Employees who are eligible for housing assistance under the Government's key worker housing scheme or certain other employees who provide an essential public service in Winchester. Further details can be

	found in the Council's Key Worker Housing Strategy (www.winchester.gov.uk) and from www.HomesinHants.co.uk . Eligible employees include some NHS staff and teachers.
<u>Lifetime Homes</u>	The Lifetime Homes Standards provide guidance on how to develop flexible and adaptable forms of accommodation. These standards make it possible to respond to changing household circumstances cost, effectively and without upheaval (www.lifetimehomes.org.uk).
Right to Acquire	A scheme allowing the outright purchase of a social rented RSL dwelling.
RSL	Registered Social Landlord, most commonly a housing association.
Social HomeBuy	A scheme allowing the purchase of an equity stake in a social rented home.
Social Rented Housing	Rented housing owned by RSLs, local authorities or other eligible bodies available to eligible households at target rent levels (target rents being determined through the national regime set out in the Government's <i>Guide to Social Rent Reforms 2001</i> or equivalent rental arrangements).
<u>Secure by Design</u>	<u>Secured by Design is the UK Police flagship initiative supporting the principles of "designing out crime" (www.securedbydesign.com).</u>
<u>Settlements</u>	<u>Large: Those over 3000 population (currently Winchester, Bishop's Waltham, Colden Common, Denmead, Kings Worthy, New Alresford, Whiteley but reviewed annually)</u> <u>Small: Other settlements subject to Policy H.3 in the Local Plan.</u>
Staircasing	Purchases by the householder of additional shares in shared ownership/equity dwellings.

This glossary provides a non-technical description of some of the terms used in this document. The descriptions should not be taken as precise legal or policy definitions.

Affordable Housing Quality Framework

Preface

Good quality homes are important not only for shelter, but also as a contributor to a range of other objectives, including those related to health, the environment, economic prosperity (both of individuals and an area), educational attainment, and family cohesion.

~~This document is an appendix to Winchester City Council's Affordable Housing Development Supplementary Planning Document. It~~ This guidance is relevant to all new affordable housing development proposed in the area setting out a range of standards and objectives the Council is seeking to achieve for new affordable housing development, irrespective of tenure or public subsidy.

Its fundamental aim is to improve residents' satisfaction with the homes they live in.

It has been developed taking account of the significant body of research on satisfaction and well-being, a range of guidance from statutory and non-statutory bodies and the views of residents. It also takes account of local circumstances, highlighting issues that are particularly significant in the local context.

Headings and sub-topics follow the format adopted by the Code for Sustainable Homes (Communities and Local Government 2006). Providers must meet the Core Standards contained in the Housing Corporation's Design and Quality Standards 2007. They are also encouraged to meet all the recommendations contained in Annex 2 of the document ~~Housing Corporation's Design and Quality Standards 2007~~ and to adopt Building for Life Principles.

Main Aims - Improved comfort, satisfaction & well-being of residents and communities.

Other Aims - Lower home running costs for residents; limitation of environmental impact.

This document applies to all affordable housing development in Winchester District; regardless of tenure and irrespective of whether public subsidy is being used to support the scheme.

General Principles

- Building for Life Principles should be adopted and application for the award is strongly encouraged, a score of at least 14 should be achieved.
- Layout and design should aim to create safe and attractive places, limit the use of private cars and improve local biodiversity.
- Information from tenants and residents should be used to inform the design process, through, for instance, design panels, satisfaction surveys, tenant choice and community plans.
- Scheme reviews and impact assessments, including customer satisfaction surveys, should be carried out and reported to Winchester City Council within 14 months of completion.
- Account should be taken of how the use of a building and the needs of occupants may change over the development's lifespan.
- Design approaches to issues such as space, privacy and flexibility should take account of the needs arising from the designed level of occupancy.
- Designs should take account of the needs of those with a mobility or visual impairment.
- Design and layout should provide opportunities for informal social interaction, including safe play for children, while maintaining privacy.
- Secured by Design principles should be adopted and award sought.
- Consideration should be given to child densities when planning a scheme. Account should also be taken of the Council's scheme of allocations and a local lettings plan agreed if necessary.
- Developments should contribute to the range of housing types available in the neighbourhood.
- Appropriate levels of community support should be put in place.
- There must be adherence to Housing Strategy objectives; Local Plan policies and Supplementary Planning Document requirements.
- Schemes should be conceived using a design and access statement approach and discussed at an early stage with Winchester City Council. Designs should take account of context and the likely nature of demand that is likely to arise from the location. The statement should also set out how the issues raised in this

document have been addressed and should form part of the pre-application discussions.

- Design standards for all schemes must be at least at the level required by the Housing Corporation to make schemes eligible for funding.

Category 1 Energy/CO2

- Orientation of dwelling to maximise the potential for passive solar gain and daylight to main living spaces (aim to achieve 4.0 extra Code for Sustainable Homes Daylight points).

Benefits: Environment; running cost to resident; fuel poverty; health; well being.

- Covered, lockable, external bike store for all dwellings.

Benefits: Environment; congestion; health; travelling costs; reducing the need to travel.

- Home Office - Space for home working for adults & children.
 - Quiet, private area - separate from sources of noise e.g. TV.
 - Double socket & phone line.
 - Space for desk & chair.
 - Consideration of position of ducting for smart cabling.

Benefits: Economy; educational attainment; reduce commuting.

- Low energy bulbs fitted on first occupation and a scheme in place to make replacements available.

Benefits: Environment; running cost to resident; fuel poverty.

Category 2 Water

- Bath; energy efficient shower & shower screen/tiling.
- Dual flush WC.
- Flow reducing/aerating taps.
- Water butt.
- Water consumption less than 105 litres per person per day.

Benefits: Reducing; running cost to resident, water consumption and surface water run off.

Category 3 Materials

- No local standards.

Category 4 Surface Water Run-Off

- Porous paving used on outside surfaces.

Benefits: Environment.

Category 5 Waste

- Internal space for bins for 3 forms of waste.
- Composting facilities where communal gardens.
- Composting bin for houses with gardens.

- Bin stores/spaces to be well screened and accessible to people with disabilities and to comply with the Council's draft SPD Storage and Collection of Domestic Waste and Recyclable Materials

Benefits: Environment, accessibility.

Category 6 Pollution

- No local standards.

Category 7 Health and Wellbeing

- Schemes should achieve a score of at least 60 for HQI Internal Environment.
- Internal and external storage should exceed the HQI unit layout requirement for the designed occupancy.
- Flexible homes
 - Changing space
 - Lifetime Home Standards should be achieved.
 - Consider how the design can assist future remodelling to meet changing needs; for instance, non load bearing walls, wide span floor construction to allow for repositioning of partition walls.
 - Consider positioning of services and windows so that flexibility is not compromised – see also home office, ~~above~~ Category 1
 - Consider larger 1 bedroom dwellings suitable for conversion to 2 beds.
 - Consider possible multifunctional use of rooms, including size of bedrooms to allow for dual use e.g. home office, space for reading.
 - Expanding space
 - Roof design to allow for loft conversion to habitable room & space on lower floor for potential staircase.
 - Consideration of how a single storey extension could be accommodated.

Benefits: Meet changing needs over time; wider appeal e.g. diverse BME community (extended families), older people (adaptability); health advantages by reducing overcrowding; home working; community stability; reduced cost of alterations; mixed communities.

- Internal Space (This section provides guidance for flats and 2 storey houses. For other property types refer to Housing Quality Indicators (www.communities.gov.uk/housing))
 - 1 bed 2 bedspace person property
 - Minimum 45 sq.m. Gross Internal Area (GIA).
 - 2 bed property
 - Separate kitchen; space for comfortable chair in 1 bedroom if only one living area provided.

- 3 person bedspace property – minimum 57 65 sq.m.GIA
- 4 person bedspace property – minimum 67 75 sq.m. GIA
- Larger dwellings
 - Two living areas provided separated by wall/door.
 - Separate kitchen; space for casual dining.
 - 3 bed 5 person bedspace- property - minimum 82 85 sq.m. GIA
 - 4 bed 6 person bedspace property - minimum 95 400 sq.m. GIA

Note: Winchester District Local Plan Review Policy H7 requires that at least 50% of any development should be 1 and 2 bedroom dwellings (not exceeding 75 sq.m. floor area).

- Noise
 - Between properties: For terraced properties and flats - achieves standards in excess of Building Regulations; demonstrated by post-completion testing or robust details.
 - Within properties: see home office/internal space and flexible homes above.
- Private Open Space
 - Balconies –sufficient space for chairs/table; privacy screen.
 - Communal spaces.
 - Resident input into design.
 - Creates opportunities for informal interaction.
 - Seating provided where residents wish.
 - Opportunities for safe, informal play for children (family dwellings).
 - Direct access from ground floor flats.
 - Private back gardens.
 - Sizes of back gardens to houses to reflect likely maximum occupancy level.
 - Private back gardens to be provided to ground floor flats where space will remain for communal provision for upper floor flats. Direct access to private gardens from ground floor flats.
 - 1.8m high fence extending 2m from wall of house into garden.
- Parking
 - Clear arrangements publicised for the use of parking outside curtilages. Allocated spaces preferred; including disabled parking.
 - Bungalows should include space for wheelchair storage and provide for a charging facility.
- Mixed and Balanced Communities

- The external appearance of affordable housing should mirror that of market housing.
- No more than 5 affordable houses of a single tenure grouped together (larger numbers may be acceptable for flats).
- Street level mixing of tenures.
- No more than 6 flats off a single access; or landing in larger schemes.
- Separate front door access for ground floor flats.
- Design and layout should provide opportunities for informal social interaction; particularly for children.
- Developments should provide active frontages/front door access to streets and create natural surveillance of public/semi public spaces.
- Developments should contribute to the range of housing types available in the neighbourhood.

Benefits: Health and wellbeing; community interaction; neighbourhood relations; fuel poverty; mixed communities; family cohesion; privacy.

Category 8 Management

- Heating system easily programmable
- Home user guide
 - To include relevant non-technical information on the operation and environmental performance of the home.
 - Information on the use of low energy light bulbs and signposting to suppliers/provision by landlord.
 - Information on recycling and composting.
 - An explanation of how to minimise condensation.
 - Available in languages other than English.
 - Available in alternative formats, e.g. large print, CD, website, Makaton.
 - Support provided by trained housing management staff.
- Secured by Design Achieved.
- Entry phone to main entrances of flats.
- Hard wired smoke alarms on each floor and in each bedroom.
- “Conveyance” plan attached to tenancy agreement setting out areas of tenant’s responsibility.
- Nominations should be sought early enough to give tenants the opportunity to have a choice of finishes.
- Appropriate levels of community support should be put in place to help new communities establish themselves and assist individuals.

Benefits: Health and Wellbeing/Safety and Security/Environmental; reduced running costs to residents; fuel poverty

Category 9 Ecology

- No local standards

Affordable Housing Commuted Sums Table 2007/8

1 bed property	£115,860
2 bed property	£143,820
3 bed property	£184,100
4 bed property	£206,650

Figures calculated using assumed open market values minus the mortgage that RSL target rental streams could support.

Figures are to be reviewed annually by applying the most locally applicable Nationwide Housing Price Index (currently South East Outer Region).

Appendix B

Affordable Housing Supplementary Planning Document

Statement of Participation

Community Involvement Requirements

The Council's Statement of Community Involvement, adopted in 2007, sets out the consultation requirements for Supplementary Planning Documents (SPD).

This explains there will be "front loaded" participation prior to a draft SPD being published, the level and scope varying according to the nature of the SPD.

Community Involvement Arrangements

Pre-production consultation took place in February and March 2007. The consultation largely took the form of a written exercise where consultees were asked for their views on a Background Paper that set out the principle issues, and specifically to focus on the following 3 issues:

1. The issues that should be covered in the SPD
2. Experiences of working with the current Affordable Housing Development Guide
3. Alternative options, within the current planning policy context, to improve the delivery and quality of affordable housing.

In addition to writing to stakeholders all details were posted on the Council's web site together with an on-line questionnaire. Discussions were also held with RSLs, other local authorities and the Winchester Housing Board.

The SPD was subsequently drafted taking account of representations received and discussions held.

The draft SPD was published for consultation in May 2007 with the consultation period running until the end of June 2007. Because of the nature of the SPD it was considered that consultation should largely be targeted at those with an interest in the development of new homes. These included developers, land owners, planning consultants, the Home Builders Federation (HBF), Registered Social Landlords (RSLs), the Government Office for the South East, Housing Corporation, Winchester Housing Board, other local authorities, parish councils. Some individual members of the community, who had previously been closely involved, in planning debates with the Council were also targeted.

Again, in addition to writing to stakeholders the draft SPD and associated documents were posted on the Council's web site together with an on-line questionnaire. Discussions were also held with RSLs, the Winchester Housing Board and a tenants' group.

Outcomes of the Community Involvement Exercises

14 written representations were received. These comments, together with the Council's response to them, are summarised in Appendix C *Analysis of Comments on Written Consultation*.

**Affordable Housing Supplementary Planning Document
Analysis of Comments on Written Consultation**

No,	Name	Ref	Comment	Response	Recommended Change
1	A2 Housing	General	Support the main content of the document	The support is welcomed.	
		1.28	Concern over the proposal that off-site contributions could be sought within smaller settlements	This is current Local Plan wording	No change
		2.7	Greater priority should be given to the provision of larger units and 50% of the larger units on S106 sites should be affordable	2.5 gives some guidance on affordable housing reflecting market types. Policy H.7 sets out the housing mix policy and cannot be amended through SPD	Additional emphasis given to larger unit provision in paragraphs 2.5 and 2.6.
		2.17	Viability of enforcing new homes to be built to Lifetime Homes Standard	Accepted that there may be site-specific reasons why lifetime homes cannot be achieved, however aim should remain.	Amend 2.17 to make clear that Lifetime Homes Standards and the Affordable Housing Quality Framework should be achieved unless the Council agrees there are specific reasons why they are not achievable on a particular site.
2	Bramdean and Hinton Amper Parish Council	Part 2, Section 2.5 (Page 10)	Who will determine local housing need? Will local need just be for exception sites?	In this context local housing needs refers to the wider housing market. This will be determined by reference to information and data derived from a number of sources	No change

				including the Strategic Housing Market Assessment (SHMA), and housing registers. SPD does not apply to exception sites.	
3	Radian Group	General	<p>Radian welcomes and supports the draft SPD and priority given to social rented housing.</p> <p>Should reduce site thresholds</p> <p>Value for money should be monitored.</p> <p>Rents at or below 75% of open market value welcomed. Consider capping future rent increases</p>	<p>The support is welcomed.</p> <p>Not an issue for the SPD, will be considered as part of the Core Strategy Issues and Options</p> <p>Agree benchmarking should be undertaken. This falls outside the remit of the SPD though.</p> <p>The affordability of rents is important. Cannot cap future rent increases in SPD.</p>	<p>No change</p> <p>No change</p> <p>Introduce a benchmark affordability test – linked to 30% of HomeBuy Agents median incomes</p>
4	Environment Agency	Section 4	<p>Recognition to be given to draft SE Plan Policies CC2 and CC3.</p> <p>Policies CS1 and CS2 of the PUSH Draft Environmental Sustainability Policy Framework should be taken into consideration</p>	<p>The South East Plan's policies are not yet adopted and therefore the SPD's Sustainability Appraisal addresses these issues through the application of a national recognised standard – the Code for Sustainable Homes Level 3.</p> <p>Only part of the District is within the PUSH area, and therefore the Policy Framework, when finalised, will not apply to the whole</p>	<p>No change.</p> <p>No change.</p>

				<p>District. The Framework is intended to inform each authority's Core Strategy, whereas this SPD supports the adopted Local Plan's policies and takes account of more recent national advice. It therefore appropriately reflects the need to meet the Code for Sustainable Homes.</p> <p>This is part of the Health Objective which covers access to open space of all kinds.</p>	No change.
5	Dr Barry Aldred	General	<p>Applauds the desire to increase the number of affordable homes.</p> <p>However, does not agree with Developers being forced to provide 40% of their homes at building cost only with free serviced land as this would lead to the price of the remaining 60% of free market new housing being forced up in price.</p>	<p>Noted</p> <p>A land deal that has been negotiated well by a developer will result in affordable housing requirements placing downward pressure on residual land values rather than upward pressure on market prices.</p>	No change
6	Andy Crowe	General	<p>Overall the Policy is welcomed, but with following comments and questions</p>	Noted	
		2.4	The duty to assist homeless families should be reflected in the size of affordable homes being developed	Noted, SHMA also identifies need for larger homes.	Amend wording to place extra emphasis on the provision of family homes
		2.7	Clarification of proposal that half of all homes are 1 and 2 bed properties. This suggests that all market homes will be contain over 2 bedrooms.	The Housing Mix policy applies across the site it is not intended to produce the outcome suggested. The mix is set by the Local Plan and so cannot be changed by the SPD	No change

		2.9	The proposals should reflect the mix of tenures that those in need can afford.	Agree, paragraph reflects this view.	No change
		2.12	It should be made clear that not all affordable homes will be located in the least attractive parts of the development	Agree with the view, but consider paragraph will achieve this by its emphasis on integration.	No change
		2.23	Regardless of build cost, the more critical issue is the amount for which the affordable homes are sold as this will determine the amount of affordable rent and/or mortgage	Both are important, though the value is affected by local market conditions. By keeping the cost down there will be downward pressure on rent charged on unsold equity. The affordability test will also help control costs to residents.	No change
		2.32	Clarification that the target for financial contribution should represent 40% of new homes	Agree clarification needed	Amend 2.32 to clarify position.
		2.42	Suggest phrase should be 'achieve additional housing objectives'	Agree, amend wording.	Add "additional" and "that could not be achieved without grant".
		Policy H.5	Whilst adopted – perhaps the council should review whether future supply of sites will be sufficient in size to generate enough affordable housing.	Adopted Local Plan policy – SPD cannot change	No change
7	Andrew Lowe Architecture Plc	General	As architects for both RSLs and private developers comments relate mainly to the need for clear and concise guidance that can be effective when preparing a planning application.		

			Generally the document appears excessively long and over complicated.	Document is long in order to meet statutory requirements regarding the content and to provide the necessary guidance on the operation of Policy H5. Consideration will be given to how the finished document can be made more accessible by removing/reducing information that is of limited use to potential users.	Summary version of the document will be published
		Part 1 Policy H.5	Include definitions of 'larger settlements' and 'smaller settlements'	Agree, amend text	Add footnote to Policy H.5: "The larger settlements and smaller settlements are defined in paragraph 6.52 of the Local Plan and in the Glossary of this SPD. The categories are subject to annual review). (Amend footnote 12 of the SPD to reflect this).
		Part 2 Detailed Guidance	Request a single source of reference from the City Council to establish basic design information	Outside the scope of the SPD	No change
		Part 3 Glossary	The Glossary is very short for a document awash with jargon and assumes the user needs little explanation	The Glossary has been revised and extended.	Add further definitions to the Glossary.

		Appendix 1	Contains duplication of general comments above	It is considered beneficial to group the issues into Appendix 1	No change
		Appendices 2 3 & 4	Not obvious why these need to be included	It is a statutory requirement to include 3 & 4.	No change
8	Peter Wilson On behalf of the Chapter of Winchester	2.31	The recognition of special circumstances of some employers is welcomed. This is set out in para 2.31. However an amendment to the text is suggested	Agree wording needs to be amended to reflect this aspiration.	Amend 2.31 and add <i>Other than in exceptional circumstances individual landowners will not be able to influence who occupies particular affordable homes unless the local planning authority agrees there are substantial community benefits or other special circumstances in which case (subject to the local planning authority's agreement) part or all of the properties may be occupied in such way</i>
9	RPS On behalf of Fairview New Homes Ltd	Policy 1	Agree with Policy 1 and supporting text in paragraph 2.5 but consider that if restrictions were put in place it imposes an unacceptable level of control on the house building industry. Therefore request that it be made clear that there will always be an appropriate level of flexibility.	Wording needs clarification	Add <i>affordable</i> before housing in first sentence.
10	Denmead Parish Council	General	The Parish Council wishes to place on record its agreement that this is an	Noted	

			important issue, and the content of the document is valuable in providing solutions to the problem.		
		Policy H.5	Would like to see the threshold reduced from 15 dwellings(0.5 hectares) to 8 dwellings (0.25 hectares)	Not a matter for the SPD. Current Local Plan policy, SPD supports this policy and cannot change it.	No change
		Part 1	The parish council continues to oppose Little Frenchies Field being on the list of Reserve Sites	Not a matter for the SPD. Current Local Plan policy, SPD supports this policy and cannot change it.	No change
			DPC considers that there is a greater need locally for affordable homes but the document seems to imply that 'social rented' is a higher priority than 'affordable'.	Social rented is just one element of affordable housing. Affordable housing encompasses other tenures. Social rented is the highest priority within the affordable sector.	No change
		Part 2	DPC mostly supports the policies set out but would make the following points.	Support welcome	
		Policy 1 Paras 2.7 & 2.8	50% too rigid. 40% more realistic	Not a matter for the SPD. Current Local Plan policy, SPD supports this policy and cannot change it.	No change
			Of the view that 1 bed properties do not meet the observed need and should be a minority of this category	Additional emphasis given elsewhere in the document to the provision of larger affordable homes.	Amend text to reflect comments
		Policy 2 Para 2.9	The split of 50% social rented and 50% intermediate affordable should be indicative and allow for variation to	Account will be taken of local requirements in considering individual sites	No change

			meet local requirements		
11	Atlantic Housing Ltd	General	Excellent document making requirements clear in a concise way	Support welcome	
		1.21	Off-site contributions should only be accepted as a last resort	SPD indicates presumption in favour of on-site provision	Add “strong” before presumption in 1.25
		1.24/25	Encourage local distinctiveness & promote family housing	Wording is as Local Plan	No change
		1.34	Priority should be social rented family housing	Policy 1 and subsequent paragraphs deal with this issue.	No change
		1.37	Add reduce carbon footprint	Consider this is dealt with by word sustainability	No change
		2.2	Welcome need for Affordable Housing Statement	Noted	No change
		2.5	Conflict between paragraph and need to comply with HQIs	Accepted	Clarify wording to reflect response
		2.7	Two bed accommodation provides greater flexibility, don’t want to provide too many 1 beds	Agreed, paragraph reflects Local Plan wording, but need to ensure there are not a disproportionate number of 1 beds and encourage larger homes	Clarify wording to reflect response
		Policy 3/2.12	Applaud need for integration, management needs to be considered and preference is for single tenure blocks	2.12 provides flexibility for flats, detailed management issues can be considered at the design stage	No change

		2.13	Set a requirement to meet Building for Life requirements	2.17 includes a requirement to meet Housing Corporation standards, which include Building for Life requirements	Reference to be made
		2.17	Agree, but make reference to HQIs	Housing Corporation standards include a HQI element	Reference to be made
		2.19	Value paid will reflect the availability of grant	Grant should not be used to inflate values	No change
		Policy 6	State reasonable build costs <u>will</u> be required. Cross ref to RICS Building Price Index. RSL Partnering contractor may be used in some cases.	Accepted	Change wording to reflect
		2.23	Reword – change <i>may be required to will be accepted</i>	Accepted	Change wording to reflect
		2.24	Unclear what this means	Noted	Make wording clearer
		2.46	A mechanism needs to be put in place to allow RSLs to progress schemes in advance of subsidy being made available. If grant available then an additional payment may be made.	Housing Corporation guidance is that grant should not be used to inflate costs/values.	No change
12	CALA Homes	General	Need for affordable housing unquestionable, however needs to be viewed in context of wider housing supply. Need to increase the supply of both affordable and market housing. Winchester City North would comply with SPD and bring benefits. Concern re 40% requirement.	These are matters that will be considered as part of the Core Strategy and Issues & Options process. They are beyond the scope of this SPD which is based on current Local Plan policy.	No change
			Nil Cost – Where high costs schemes	SPD provides for applicants to	No change

			may be unviable. Sceptical about an open book approach.	discuss genuine deliverability problems.	
13	HCC	1.5	Accept need to secure affordable housing on specialist housing sites, but asks for flexibility if affects viability. Suggest economics of provision taken into account	Accept economics of provision taken should be taken into account. Viability is covered in 2.25.	No change
		Policy 2	Concern that 100% affordable housing on sites providing 5 or less may be unviable. Conflict with government's aspirations to widen home ownership and provide a range of housing types. Propose 50/50 split of tenures.	Requirements reflect priority need, however they do also encourage intermediate affordable housing products that widen home ownership. The Council also encourages Open Market HomeBuy (unrelated to land-use planning) to achieve this. Document provides opportunity for challenge on viability grounds on individual sites.	No change
		Policy 3	Support aim to create integration however consider groups of 15-25 more appropriate.	Research shows (e.g. Housing Corporation) that for any benefit to be achieved properties of different tenures need to be next door to each other. Small groupings are already being achieved on development sites. The SPD is clear that design issues rather than simply an arithmetic formula will inform judgements on an acceptable level of integration on individual schemes.	No change
		Policy 7	Object to approach to key workers, should be as part of the overall housing	Reference to key workers was included to add clarity. Key	Delete 2.31 and add <i>Other than in exceptional</i>

		Policy 8	<p>provision, should not separate out key workers as a separate form of housing.</p> <p>Suggest that where there is a high concentration of social rented housing it may be sensible to provide “new” affordable housing elsewhere in order to diversify tenures. Propose add: “It can be demonstrated to the satisfaction of the Council that the provision of affordable housing would better support the creation of mixed and balanced communities by being located off-site”</p>	<p>workers are not being discriminated against, they are as able to access affordable housing as any other member of the community. It is important that housing is provided that meets the strategic objectives of the District Council, not the individual needs of a land owner. Amend wording to clarify.</p> <p>Accept that where there are high concentrations of social rented housing it may not be desirable to reinforce these. However, it is likely this could be achieved by ensuring a sympathetic tenure choice.</p>	<p><i>circumstances individual landowners will not be able to influence who occupies particular affordable homes unless the local planning authority agrees there are substantial community benefits or other special circumstances in which case (subject to the LPA’s agreement) part or all of the properties may be occupied in such a way</i></p> <p>Amend 2.34 a) – alternative provision is proposed that would allow priority needs to be better met and better support the creation of mixed and balanced communities.</p>
14	Mr Hayter	General	<p>Should apply more widely than H.5 sites. Would not enable affordable housing to be maximised because:</p> <ul style="list-style-type: none"> • should be provided by %site area rather than number of dwellings • fails to define how viability would be assessed • affordable homes should be developed at a higher density specifying minimum density • criteria for assessing site capacity should be set out • paragraph 2.5 would not allow 	<p>An SPD must support a planning policy in the Local Plan and this SPD has been produced to amplify the operation of Policy H.5, which sets out the requirements for affordable housing provided as a proportion of market housing sites.</p> <p>The proportions of affordable housing are determined by the Local Plan and not this SPD, and it is for the developer to determine how evidence on viability is provided. The</p>	No change proposed.

			<p>for the Government's proposed £60,000 homes.</p> <ul style="list-style-type: none"> • fails to recognise that sites with affordable housing are more sustainable than those without. • benefits from prioritising the shortage of affordable housing need to be maximised. 	<p>number of dwellings a site can accommodate will vary with the character of the area, through the operation of Policy DP.3, not this SPD. The density of affordable homes should not necessarily be higher as it will depend on their location within a development and the types of homes needed. Paragraph 2.5 is not intended to stifle innovation, and provides sufficient flexibility to accommodate it as drafted.</p> <p>Although sites with affordable housing are recognised as being more sustainable, they can still only be achieved with certainty through the operation of Policy H.5. Provision will therefore generally be limited to locations of qualifying sites. The SPD can only operate through Policy H.5, and aims to provide benefits through providing the right kind of housing and of the right quality.</p>	
		Preface	Should mention hidden households	The Preface already sets out the problems stemming from inadequate housing and those of 'hidden households' are covered by this paragraph.	No change proposed.
		Para 1.11	The SHMA has yet to be published, therefore how can it inform the SPD?	SHMA now received. Paragraph 1.11 already makes it clear that only some of the SHMA's conclusions can	No change proposed.

				inform this SPD, but others can only be addressed through the preparation of LDDs.	
		Para 1.19	The reference to low cost housing is confusing as the Government definition for intermediate housing now includes other 'low cost homes for sale'.	There is a difference between 'low cost market' housing and the 'low cost homes for sale' referred to in the definition of intermediate housing in PPS 3. "Low cost market" housing is specifically excluded in that definition. Paragraph 1.19 of the SPD uses the Government terminology in PPS 3.	No change proposed.
		Para 1.26	Should clarify which definition will be used	As set out in paragraph 1.26, both the PPS and Local Plan definitions are relevant to this SPD.	No change proposed.
		Para 1.31	Should emphasise the weight of the Regional Housing Strategy	Additional wording should be added to reflect priorities.	Additional wording added.
		Para 1.34	Social housing is not the priority, but the largest part of a range of types that have equal priority. In 'Priority 1' "additional affordable homes" should be replaced with "homes for the maximum number of persons on the housing registers".	The provision of affordable (social) rented housing <u>is</u> the priority as that is what the vast majority of households on the housing registers need. It is not considered that the proposed change improves the wording of 'Priority 1' as maximising the number of persons may not be the only consideration.	No change proposed.
		Para. 2.5	Will conflict with Priority 1 as affordable housing may need to be a different size and character to market housing.	As set out in the response to the general points above, it is not accepted that paragraph 2.5 provides insufficient	No change proposed.

		<p>Paras. 1.36, 2.6, and 2.10.</p> <p>Para. 2.32</p>	<p>Should include criteria and worked examples to show how Housing Enabling Team advise on a preferred mix of dwelling sizes and types.</p> <p>Should include worked example of how a part-contribution would be calculated.</p>	<p>flexibility – there would therefore be no conflict with Priority 1.</p> <p>The respondent suggests the inclusion of a number of worked examples for advising on the dwelling mix, and for calculating contributions (paragraphs 1.36, 2.6, 2.10 and 2.32). The former would be based on up-to-date register information, and a worked example would serve no useful purpose.</p>	<p>No change</p>
		<p>Para 2.12</p>	<p>Needs more flexibility on the maximum size of groupings of affordable homes</p>	<p>The guideline maximum grouping of 5 affordable dwellings in paragraph 2.12 has been set to enable the integration of affordable and market housing and is based on experience of operating the Affordable Housing Development Guide. It also reflects experience of maximum grouping sizes in other authorities. The wording allows sufficient flexibility to vary the figure if required.</p>	<p>No change proposed.</p>
		<p>Para. 2.33</p>	<p>Need to maximise the number of affordable homes is not recognised elsewhere.</p>	<p>The aim of the SPD is to achieve the right kind and quality of affordable housing. The Local Plan policy provides the basis for increasing the</p>	<p>No change proposed.</p>

		Para. 2.41	Requires more comprehensive criteria than a benchmark.	numbers. Paragraph to be reworded in order to reduce opportunities for challenge..	Amend paragraph to refer to the Affordability Test and require reasonable service charges.
		Appendix 2	Is not referred to in the SPD or its use.	Appendix 2 should be cross – referred to in the SPD.	Suggest addition of wording on end of Para 2.32 “Currently the contribution levels are based on those in Appendix 2, but these are revised annually. Developers should therefore seek advice from the Housing Enabling Team if this approach is to be used”.
		Appendix 3	The reasons why only 8 out of 22 issues raised have been incorporated should be explained.	Appendix 3 already explains why particular issues were selected to be developed and incorporated into the SPD. The remaining issues were either not appropriate for inclusion in SPD, or conflicted with other issues.	No change
		Appendix 4	The appraisal gives credit for some issues not referred to in SPD. In para 4.11, the SPD does not consider whether social housing can be used for employment purposes.	The reference here relates to Category 1 in the Quality Framework. The issue here is having space within the home for home working for adults and children.	No change

Winchester City Council

**Affordable Housing
Supplementary Planning
Document (SPD)**

Sustainability Appraisal

January 2008



Affordable Housing Supplementary Planning Document (SPD)

Sustainability Appraisal

Prepared for: Winchester City Council

<i>date:</i>	January 2008	
<i>prepared for:</i>	Winchester City Council	
<i>prepared by:</i>	Liz Payne Ruth Thomas	
<i>quality assurance:</i>	Barbara Carroll	

enfusion

environmental planning and management for sustainability



Treenwood House
Rowden Lane
Bradford on Avon
BA15 2AU
t: 01225 867112
www.enfusion.co.uk

Affordable Housing Supplementary Planning Document (SPD) Sustainability Appraisal

CONTENTS

- 1.0 **Introduction**
Consultation
- 2.0 **Methodology**
- 3.0 **Local Plans, Programmes & Baseline Relevant to the SPD**
- 4.0 **Sustainability Appraisal:**
 - Saved Policy H.5 Adopted Winchester District Plan Review 2006
 - Objectives Compatibility Analysis
 - SPD Individual Policies
- 5.0 **Monitoring**

TABLES

- 1 Interim SA Framework
- 2 Appraisal of Saved Policy H.5 adopted Winchester District Plan Review 2006
- 3 Compatibility Analysis
- 4 Appraisal of SPD Policies
- 5 Consultation Responses
- 6 SPD Policy Revisions

1.0 Introduction

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Development Documents (LDDs). This requirement is set out in Section 39 (2) of the Planning and Compulsory Purchase Act, 2004 and Planning Policy Statement 12: Local Development Frameworks, 2004. Local Development Documents must also be subject to Strategic Environmental Assessment¹² (SEA) and it is advised³ that an integrated approach is adopted so that the SA process incorporates the SEA requirements.
- 1.2 Winchester City Council is undertaking Sustainability Appraisal of its Local Development Documents as they are prepared and in accordance with this legislation and guidance. In of May 2007 [when this SPD underwent its appraisal] the LDF SA was at the scoping stage with other relevant plans identified, baseline data collected, and initial sustainability issues identified. Consultation with key stakeholders had commenced through workshops with Council Members and Officers and this subsequently informed the preparation of the SA Framework used to appraise the LDDs. The SA Framework was reviewed at a SA Scoping Workshop during June 2007 and finalised following wider public consultation.
- 1.3 This document reports the Sustainability Appraisal of the Draft and Final Affordable Housing Development Supplementary Planning Document (SPD) with an Affordable Housing Quality Framework as an appendix. This appendix expands on the policies in the SPD and has been considered in the SA where appropriate. Government guidance on SA/SEA advises that in most cases SA of SPDs will draw extensively on appraisals undertaken at the higher level for policies within the DPD and the need for new work may be limited. Information should be taken from existing baselines and Plans/Programmes that have been prepared as part of the Sustainability Appraisal Scoping process.
- 1.4 Some authorities have screened out the need for SEA of SPDs where it is proven that there is no significant environmental effect and where the policy on which the SPD is based has been the subject of SA incorporating SEA. This approach has been agreed by the three statutory consultees (English Heritage, Environment Agency, and Natural England) on several occasions. Whilst this was an option for the Council it was been decided to use a full SA Framework incorporating SEA due to the reasons below.
- 1.5 This Draft Affordable Housing Supplementary Planning Document has been developed from the existing Affordable Housing Development Guide and is supplementary to the saved policy H.5 from the current adopted Winchester District Plan Review 2006 (which was only subject to SA under the earlier and less extensive regulations). Therefore the policy will be assessed as part of this Sustainability Appraisal.

¹ EU Directive 2001/42/EC

² Environmental Assessment of Plans and Programmes Regulations 2004

³ ODPM, 2005 *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*

- 1.6 This SPD is based on an existing Guide, and as noted above was produced very early in the Local Development Framework process, prior to the finalisation of the SA Framework. To expedite the adoption of this important SPD, appraisal was undertaken using the interim SA Framework (which was still subject to final consultation comments). The SA Framework was considered robust as it was based on the SA objectives from the SA/SEA Framework⁴ used for the South East Plan and it incorporated local issues for planning and sustainability identified through the LDF workshops that included Members, Officers and a number wider public stakeholders. This interim SA Framework is presented in Table 1.

Consultation

- 1.7 The Affordable Housing SPD and the accompanying Sustainability Appraisal were placed on public consultation 1 May – 30 June 2007. Consultation comments on the Sustainability Appraisal and the Council's responses are shown in Table 5. Following the consultation, some minor amendments to policy wording were agreed, these changes are shown in Table 6. The changes to the policy are not significant and no additional sustainability appraisal was undertaken on the SPD policies.

2.0 Methodology

- 2.1 The methods used for the sustainability appraisal comprise the following elements:

- Identifying relevant baseline information and other plans or programmes.
- Appraisal of the saved policy H.5 adopted Winchester District Plan Review 2006.
- Testing the objectives of the SPD for compatibility with the SA Framework objectives.
- Testing the individual policies contained within the SPD, for compatibility with the SA Framework. This will identify in which areas the SPD will have most impact and inform the next stage of the process.
- Comments on each objective of the SA Framework, drawing out, and dealing with in detail, the areas where the SPD has specific potential impacts and highlighting short/long term effects, cumulative effects, and proposed mitigation.
- Comparison with a "do nothing" option. The SA Regulations and Guidance require that options and alternatives are given consideration, including the "do nothing". In the case of this SPD the purpose is to introduce clarity to developers and others on the implementation of Policy H.5 and to ensure conformity with other government guidance on the provision of affordable housing. Therefore the content of the SPD is constrained and as such a strategic approach has been taken to the issue of options.

⁴ <http://www.southeast-ra.gov.uk/southeastplan/key/sustainability.html>

3.0 Local Plans, Programmes & Baseline Relevant to the SPD

- 3.1 **Hampshire Local Area Agreement:** A 3 year agreement between partners in Hampshire and the Government to improve sustainable communities and develop the quality of life by looking at the needs of children and young adults, helping to alleviate unemployment and economic inactivity, reduce domestic violence and improve the support of those reliant on care to reduce the pressures on hospitals. Note Priority D that seeks to improve access to Housing and Accommodation.
- 3.2 **Hampshire County Structure Plan 2006-2011:** Proposes a Strategy for development, travel, housing, economic growth and protecting the environment and heritage within the county. The Strategy adopts a sustainable approach balancing development, environment and transport needs across the whole range of issues, ultimately classing the population's quality of life as a real indicator.
- 3.3 **Winchester City Council Housing Strategy for 2004 – 2007 *Shaping up for the Future – Promoting Quality, Availability and Choice.*** Sets out the identified needs for the area and the Strategy to achieve meeting these needs including the provision of affordable housing.
- 3.4 **Winchester City Council Draft Corporate Strategy 2007-2012:** The Strategy sets out the broad aims of the City Council in delivering a good quality of life for the well being of the district balancing economic, environmental and social pressures.
- 3.5 **Winchester City Council Housing Services Black and Minority Ethnic Strategy 2005-2008:** This follows from the 2002-2005 Strategy and updates the aims of the Housing Service in meeting the needs of a culturally diverse community to reduce the likelihood of discrimination and isolation.
- 3.6 **Winchester City Council Health and Housing Department Homelessness Strategy 2003-2008:** The Strategy develops local initiatives to comply with the Homelessness Act 2003 to reduce and prevent homelessness within the community through understanding the causes and preparing specific courses of action.
- 3.7 Between 1991 and 2001 Winchester Council's population grew from 96,386 to 107,222, an increase of 11.2%; 35% of the population lives within Winchester City and the other 65% in the rural area beyond. Winchester's population has increased through a net gain in migration, the 2001 census showed 7.3% of the population as internal migrants. This may be linked directly to the city's proximity to London, attractive as a major commuting area.
- 3.8 Households with no adults in employment: with dependent children (%) 2001 = 1.89% compared to 3.29% in the South East Region. There are over 2000 households who are currently on housing registers for the area and average property prices are over £300k.

4.0 Sustainability Appraisal

Appraisal of Saved Policy H.5 adopted Winchester District Plan Review 2006

Policy H.5

The Local Planning Authority will permit housing development on suitable sites where affordable housing forms:

(i) 40% provision within the defined built-up area of Winchester; and - 30% provision within the defined built-up areas of the other larger settlements; where 15 or more dwellings are proposed, or the site is 0.5 hectares or more;

(ii) 40% provision within the Major Development Area at Waterlooville and the Strategic Reserve Major Development Areas at Waterlooville and Winchester City (North), if confirmed.

(iii) 30% provision within the defined built-up areas of the smaller settlements and elsewhere in the District, where the site can accommodate 5 or more dwellings, or exceeds 0.17 hectares.

(iv) 35% of the housing provision within the Local Reserve housing sites at:
- Pitt Manor, Winchester;
- Worthy Road/Francis Gardens, Winchester;
- Little Frenchies Field, Denmead;
- Spring Gardens, New Alresford; should the need for the release of any of these confirmed.

The number, type and tenure of the affordable dwellings will be negotiated for each development, taking into account the need for affordable housing, market and site conditions, and other relevant factors. The Local Planning Authority will need to be satisfied that appropriate arrangements are in place to ensure that the affordable housing remains genuinely available to those in housing need as long as the need exists (subject to any relevant statutory provisions).

4.1 The detailed SA of the saved policy is presented in Table 2; the appraisal illustrates that the policy has significant benefits in terms of social and economic objectives, particularly relating to balanced communities, housing and health. The need for such housing is clearly defined in the Winchester City Council's Housing Strategy for 2004 – 2007 *Shaping up for the Future – Promoting Quality, Availability and Choice* and the policy is fundamental to the Strategy. As affordable housing provided through this policy will inevitably be part of an overall site, the wider environmental issues such as impact on landscape, transport, biodiversity, the water environment, should have been thoroughly assessed as a housing allocation and/or will be subject to other specific policies in the forthcoming LDDs which have undergone Sustainability Appraisal.

4.2 As this is a saved policy no options have been considered and a "do nothing" option is not appropriate as such a policy is a requirement of PPS 3.

Testing the Objectives of the SPD for Compatibility with the SA Framework Objectives

- 4.3 The SPD sets out priorities which reflect Council objectives and these are being interpreted for this SA as the objectives of the SPD. The priorities are:
- To meet the Council Objectives by providing additional social rented housing.
 - To meet Council objectives by promoting high quality affordable housing that contributes towards sustainability, provides a suitable range of housing types and sizes and helps create mixed and balanced communities.
- 4.4 The first priority is achieved through the implementation of Policy H.5 which has been assessed above, but the second priority is concerned with the quality and mix of the accommodation provided. The priority clearly strategically reflects the SA Framework with reference to communities, housing and the issues which contribute to sustainability and it is not considered to be necessary to test it against each and every SA Framework objective.

Appraising the Individual SPD Policies for Compatibility with the SA Framework

- 4.5 The Draft SPD contains the following policies:
1. A variety of affordable dwelling types and sizes should be provided to meet the wide range of identified housing needs.
 2. Priority is given to the provision of affordable housing for rent. Where 5 or less affordable dwellings are to be provided all should be for social rent. Any additional affordable dwellings provided should be split evenly between social rented and intermediate tenures.
 3. Affordable housing should be well integrated with market housing in a way which results in different kinds of housing being in close proximity to each other. Large groupings of single tenure dwellings or dwelling types should be avoided.
 4. Affordable housing should be indistinguishable from market housing in terms of appearance and meet Lifetime Home Standards, Housing Corporation development standards and at least Code for Sustainable Homes Level 3.
 5. Provision should preferably be by a partner Registers Social Landlord, although an alternative provider may be agreed with the Council, subject to criteria.
 6. Affordable housing land should be made available clean and serviced at nil cost. Reasonable build costs can be required.
 7. Affordable housing should be reserved for households identified as being in housing need and registered on one of the Council's housing registers, or register such as the Zone Agent's register, approved by them. Nominations will be made by the Councils from those registers.
 8. Affordable housing should be provided on site except as in specific circumstances.
 9. Affordable housing must be available as long as the need exists.
 10. Service charges should not render dwellings unaffordable.

11. Affordable housing should be delivered free of public subsidy, unless the use of subsidy would improve the numbers or mix of dwellings in which case the level of subsidy needed should be minimised.
12. Affordable housing should be secured through a planning obligation.
13. An affordable housing statement should accompany a planning application.

4.6 Appraising these policies for compatibility with the SA Framework identifies in which areas the SPD could have most impact and inform the next stage of the process. Table 3 presents the compatibility analysis and illustrates that the SPD is compatible with the proposed draft interim Sustainability Appraisal Framework; it highlights the policies that are most relevant in this appraisal and on which can be considered to have significant impact. No areas of incompatibility have been disclosed. The policies below are those given more detailed consideration as presented later in Table 4.

1	A variety of affordable dwelling types and sizes should be provided to meet the wide range of identified housing needs.
2	Priority is given to the provision of affordable housing for rent. Where 5 or less affordable dwellings are to be provided all should be for social rent. Any additional affordable dwellings provided should be split evenly between social rented and intermediate tenures.
3	Affordable housing should be well integrated with market housing in a way which Results in different kinds of housing being in close proximity to each other. Large groupings of single tenure dwellings or dwelling types should be avoided.
4	Affordable housing should be indistinguishable from market housing in terms of appearance and meet Lifetime Home Standards, Housing Corporation development standards and at least Code for Sustainable Homes Level 3.
9	Affordable housing must be available as long as the need exists.
12	Affordable housing should be secured through a planning obligation

Social Issues

- 4.7 The policies contained in the SPD ensure that the required mix of affordable housing in terms of dwelling size and tenure will be provided in perpetuity. Matters of social balance and integration are addressed through the requirement that the affordable housing should be indistinguishable from market housing and should be in groups of no larger than five and generally dispersed throughout the site. There are often perceived social problems associated with affordable housing and this approach should alleviate such concerns.
- 4.8 The beneficial impact on health that accompanies the provision of quality housing for all is recognised including the “knock on” effects which can include improved family relationships and educational attainment.
- 4.9 The SPD fully accords with the social objectives of the proposed SA Framework and the short and long term effects should be beneficial.

Economic Issues

- 4.10 As with other localities, young people are often forced to leave areas, or unable to move to areas to take up employment opportunities, due to house prices. The

provision of affordable housing for social rent or the opportunity to engage in a shared equity scheme could enable young people to live and work in the area would be beneficial to the local economy and reduce in and out commuting for work.

- 4.11 The Quality Framework encourages the provision of flexible dwellings which can accommodate home offices and will therefore support the self-employed/small business sector of the local economy. Overall, therefore, the SPD has positive impacts for the economy and the short and long term effects should be beneficial.

Environmental Issues

- 4.12 As detailed in Table 4, the affordable housing will generally be a component part of a larger site which will have been the subject of individual SA, or at least subject to policies that have been appraised. Therefore there should be no issues around the impact on the built, natural and historic environments which have not been assessed in this wider context and there will be no further impact through the provision of affordable housing.
- 4.13 However the requirement that affordable housing achieves the Code for Sustainable Homes Level 3 has significant environmental benefits. The Code sets minimum standards for energy and water use at each level and, within England, replaces the EcoHomes scheme, developed by the Building Research Establishment (BRE). Some of the aims of the Code are set out in Table 4 and the benefits of adopting this best practice on issues of climate change, energy use and water management are noted. Level 3 of the Code for Sustainable Homes also specifies energy saving for both construction and operation of dwellings well above the current average standards further promoting reduced adverse effects on the environment.
- 4.14 The SPD strives to minimise any adverse effects on the environment and will have a very positive effect in both the short and long term effects, especially when considered against the option of not having this guidance in place.

Overall Sustainability

- 4.15 From the compatibility tables and appraisal of sustainability effects detailed in Tables 2, 3 and 4, it is clear that the SPD is very positive in achieving the aim of producing affordable housing in a sustainable manner. Key to achieving this objective are the policies in the SPD on mix, layout, tenure and management of housing, together with the achievement of Level 3 of the Code for Sustainable Homes. Apart from looking at very minor alternative wording to some of the policies, the only other alternative is a "do nothing" option which it is clear would not help achieve the requirement to provide such housing in such an environmentally sensitive manner. The SPD will provide clarity for developers and Registered Social Landlords (RSLs) and be instrumental in expediting the provision of the much needed affordable housing in the locality.
- 4.16 Whilst Policy H.5 sets out the requirement for affordable housing on sites of specific size and location, the SPD sets out policies that guide the implementation of the policy. These policies clarify the detail of provision and cover issues of

tenure, design, integration, management, nomination rights and the need for a legal agreement (Sec 106) to secure provision and the need for housing to remain affordable in perpetuity. However there is also some flexibility expressed over providers and subsidy which may help achieve provision. All these issues are very positive in terms of achieving the sustainability objectives of balanced communities and achieving housing for all.

5.0 Monitoring

- 5.1 Proposals for monitoring the significant effects of implementing the DPDs and SPDs are a core part of the SA process. Government advises a pragmatic approach and encourages synergy between the monitoring requirements for the SA, the LDF and the Annual Monitoring Report (AMR) (a requirement of the Planning Act, 2004). Indicators and targets need to be relevant, strategic and manageable. Affordable Housing indicators are currently part of the Core Indicator set for Winchester's Annual Monitoring Report.
- 5.2 The SA Scoping Report for Winchester's LDF proposes a number of indicators and targets for the SA objectives, including those for housing – with a focus on delivering the commitments on affordable housing set out in this SPD. Current suggested indicators include: % of housing stock available [that is affordable]; number of affordable housing unit completions/ per year.⁵
- 5.3 This approach links effectively with the aims and objectives of the AMR and data gathering and reporting in relation to the SA/SEA and the AMR should benefit from this shared approach.

⁵

<http://www.winchester.gov.uk/Housing/Planning/LocalDevelopmentFramework/SustainabilityAppraisals/>

Table 1: Interim SA Framework

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
1	Building Communities <i>SEA topics: Population</i>	
	To promote, create and sustain communities that meet the needs of the population and reduce social exclusion.	Does the option/policy: <ul style="list-style-type: none"> ▪ Help provide adequate facilities for social interaction ▪ Promote balanced communities with a range of housing size and tenure ▪ Reduce exclusion of groups including the young and elderly ▪ Support the vulnerable and disadvantaged
2	Infrastructure <i>SEA topics: Material Assets</i>	
	To provide adequate infrastructure to support new and existing development	Does the option/policy: <ul style="list-style-type: none"> ▪ Encourage the development of green infrastructure ▪ Ensure that new development minimises pressure on existing infrastructure e.g. road systems, water supply
3	Housing <i>SEA topics: Population</i>	
	Provision of good quality housing for all	Does the option/policy: <ul style="list-style-type: none"> ▪ Deliver affordable housing both in urban and rural areas ▪ Assist in the accommodation of housing growth and achieving positive benefits for communities ▪ Balance housing and employment land delivery ▪ Provide for an appropriate mix of dwelling size, type, density and phasing on appropriate sites ▪ Provide for a range of housing to meet the needs of specific groups, e.g. the elderly and disabled
4	Economy and Employment <i>SEA topics: Population</i>	
	To develop a dynamic, diverse and knowledge based economy	Does the option/policy: <ul style="list-style-type: none"> ▪ Provide high quality jobs in sustainable locations ▪ Reduce out commuting ▪ Help to establish Winchester as a major focus of learning and education ▪ Recognise the role of retail in the local economy ▪ Support workplace homes ▪ Balance employment and housing growth ▪

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
5	Transport <i>SEA topics: Air, Climatic Factors, Population, Material Assets</i>	
	Reduce car dependency whilst retaining Winchester as an attractive place to live and work	Does the option/policy: <ul style="list-style-type: none"> ▪ Facilitate the establishment of safe and regular public transport ▪ Promote the creation of footpaths and cycle links between settlements, homes and work and community facilities ▪ Locate new development to reduce the need for use of the private vehicle ▪ Help create an integrated public transport system e.g. park and ride, safe storage for bicycles at train stations ▪ Adopt maximum parking standards and requirement for safe motorbike and cycle storage and the provision of changing facilities in work places
6	Health <i>SEA topics: Human Health</i>	
	To improve the health and well being of the population and reduce inequalities in health	Does the option/policy: <ul style="list-style-type: none"> ▪ Protect and increase the provision of public open spaces, sports facilities and play areas, ▪ Promote design that reduces crime and fear of crime ▪ Increase accessibility to health facilities ▪ Recognise the relationship between health and education
7	Water <i>SEA topics: Water</i>	
	Protect and enhance the water environment and manage water resources in a sustainable way	Does the option/policy: <ul style="list-style-type: none"> ▪ Promote the use of water efficiency measures such as grey water recycling ▪ Promote the use of sustainable urban drainage systems ▪ Protect water sources and quality ▪ Consider water demand when assessing new development
8	Waste <i>SEA topics: Material Assets</i>	
	To reduce waste generation and land disposal and achieve the sustainable management of waste	Does the option/policy: <ul style="list-style-type: none"> ▪ Help reduce waste and facilitate recycling ▪ Encourage composting ▪ Support alternatives to landfill
9	Climate Change <i>SEA topics: Climatic Factors</i>	
	To address the causes of climate change through reducing emissions of greenhouse gases and to mitigate against the	<ul style="list-style-type: none"> ▪ Help reduce carbon emissions ▪ Support higher level policy ▪ Help mitigate against the impact of climate change

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
	impact of change	<ul style="list-style-type: none"> ▪ Help adaptation to climate change ▪ Assist education programmes in environmental issues
10	Energy <i>SEA topics: Climatic Factors, Population, Material Assets</i>	
	To increase energy efficiency and the proportion of energy generated from renewable sources	<ul style="list-style-type: none"> ▪ Adopt a flexible approach to energy saving design ▪ Encourage the use of micro generation and passive solar gain ▪ Seek a percentage of energy from renewable sources in new development
11	Sustainable Construction <i>SEA topics: Air, Water, Climatic Factors</i>	
	Promote sustainable design and construction practices	<p>Does the option/policy:</p> <ul style="list-style-type: none"> ▪ Ensure new development is located with sustainable principles as far as possible, in particular, focusing development on the urban areas ▪ Seek the incorporation of energy efficiency measures in new development aiming for carbon neutral dwellings and workplaces ▪ Seek high density in new development in appropriate locations ▪ Encourage the reuse of materials in construction ▪ Promote the sourcing of locally and sustainably sourced and recycled materials in construction and renovation
12	Biodiversity <i>SEA topics: Biodiversity, Fauna and Flora</i>	
	To conserve and enhance biodiversity	<p>Does the option/policy:</p> <ul style="list-style-type: none"> ▪ Protect and enhance valuable flora, fauna, wildlife habitats and species, both those statutorily designated and those of local value ▪ Avoid and reverse, where possible, habitat fragmentation ▪ Result in no net loss of biodiversity ▪ Provide opportunities for provision and enhancement of greenspace
13	Cultural Heritage <i>SEA topics: Cultural Heritage</i>	
	Protect and enhance the built and natural historic heritage and culture	<p>Does the option/policy:</p> <ul style="list-style-type: none"> ▪ Support locally-based cultural resources and activities ▪ Protect and improve historical and archaeological environment including archaeological sites, listed buildings, conservation areas and the historic

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
		landscape <ul style="list-style-type: none"> ▪ Help accommodate new development without detriment to the existing
14	Landscape <i>SEA topics: Landscape</i>	
	Protect Winchester's landscape setting and the wider landscape	<ul style="list-style-type: none"> ▪ Minimise impact on the landscape setting of the town ▪ Prioritise the use of previously developed land to minimise greenfield development ▪ Ensure protection of the AONB, National Park and local landscape designations
15	Built Environment <i>SEA topics: Cultural heritage, Population</i>	
	Secure high standards of design	Does the option/policy: <ul style="list-style-type: none"> ▪ Promote recognition of local distinctiveness in style and materials ▪ Make best use of existing buildings and promote innovation
16	Pollution <i>SEA topics: Air, Climatic Factors and Human Health</i>	
	Protect and improve local and global air quality and manage other sources of pollution	Does the option/policy: <ul style="list-style-type: none"> ▪ Maintain or improve local air quality, through transport management and reduction of employment related emissions ▪ Reduce and manage air and noise pollution particularly with regard to sensitive developments ▪ Consider the impact of light pollution ▪ Ensure there is no pollution of water sources

Table 2: Appraisal of Saved Policy H.5 adopted Winchester District Plan Review 2006

The Local Planning Authority will permit housing development on suitable sites where affordable housing forms:

- (i) 40% provision within the defined built-up area of Winchester; and - 30% provision within the defined built-up areas of the other larger settlements; where 15 or more dwellings are proposed, or the site is 0.5 hectares or more;*
- (ii) 40% provision within the Major Development Area at Waterlooville and the Strategic Reserve Major Development Areas at Waterlooville and Winchester City (North), if confirmed.*
- (iii) 30% provision within the defined built-up areas of the smaller settlements and elsewhere in the District, where the site can accommodate 5 or more dwellings, or exceeds 0.17 hectares.*
- (iv) 35% of the housing provision within the Local Reserve housing sites at:*
 - Pitt Manor, Winchester;*
 - Worthy Road/Francis Gardens, Winchester;*
 - Little Frenchies Field, Denmead;*
 - Spring Gardens, New Alresford; should the need for the release of any of these sites be confirmed.*

The number, type and tenure of the affordable dwellings will be negotiated for each development, taking into account the need for affordable housing, market and site conditions, and other relevant factors. The Local Planning Authority will need to be satisfied that appropriate arrangements are in place to ensure that the affordable housing remains genuinely available to those in housing need as long as the need exists (subject to any relevant statutory provisions).

D PLAN

Sustainability Appraisal Key	
DG	Development actively encouraged as it would resolve an existing sustainability problem
LG	No sustainability constraints and development acceptable
B	Neutral or unknown effect
Y	Potential sustainability issues; mitigation and /or negotiation possible
O	Problematical and improbable because of known sustainability issues ; mitigation or negotiation difficult and /or expensive
R	Absolute sustainability constraints to development

	SA Objectives	Comment	
1.	To promote, create and sustain communities that meet the needs of the population and reduce social exclusion	The policy is fundamental to achieving this objective which includes promoting balanced communities with a range of housing size and tenure and to support the vulnerable and disadvantaged.	DG
2.	To provide adequate infrastructure to support new and existing development	As part of proposed larger developments there should be no further impact on existing infrastructure or that proposed to serve the development.	LG
3.	Provision of good quality housing for all	Again this policy is fundamental to the delivery of affordable housing in Winchester and other urban and rural areas.	DG
4.	To develop a dynamic, diverse and knowledge based economy	The provision of affordable housing may assist the loss of younger people from the economy who are forced to leave the area because of house prices.	DG
5.	Reduce car dependency whilst retaining Winchester as an attractive place to live and work	The impact on transport will depend on the location of sites but these should be subject to SA and therefore in acceptable locations.	LG
6.	To improve the health and well being of the population and reduce inequalities in health	There is an accepted relationship between quality of housing and health and the proposed sites should be located with good access to health and other community facilities.	DG
7.	Protect and enhance the water environment and manage water resources in a sustainable way	As part of larger sites which should have a thorough assessment of water issues there should be no further impact.	LG
8.	To reduce waste generation and land disposal and achieve the sustainable management of waste	As part of larger sites there should be provision of kerbside collection and the provision of recycling/composting facilities; the Quality Framework requires achievement of Level 3 of Code for Sustainable Homes including specific requirements for waste management.	LG
9.	To address the causes of climate change through reducing emissions of greenhouse gases and to mitigate against the impact of change	All development has the potential to address these issues and will be dependent on agreements between the developers, the RSLs and the LPA.	B
10.	To increase energy efficiency and the proportion of energy generated from renewable sources	All development has the potential to address these issues and will be dependent on agreements between the developers, the RSLs and the LPA. This will also be subject to other policies in the LDF. The Quality Framework requires achievement of Level 3 of	B

		Code for Sustainable Homes including specific requirements for energy efficient light fittings and energy produced from renewable sources.	
11.	Promote sustainable design and construction practices	All development has the potential to address these issues and will be dependent on agreements between the developers, the RSLs and the LPA. This will also be subject to other policies in the LDF.	B
12.	To conserve and enhance biodiversity	The impact on biodiversity will depend on the location of the overall sites but these should be subject to SA and therefore in acceptable locations.	B
13.	Protect and enhance the built and natural historic heritage and culture	The impact on Conservation Areas, Listed Buildings, archaeological remains etc. will depend on the location of the overall sites but these should be subject to SA and therefore in acceptable locations.	B
14.	Protect Winchester's landscape setting and the wider landscape	The impact on the landscape will depend on the location of the overall sites but these should be subject to SA and therefore in acceptable locations.	B
15.	Secure high standards of design	All development has the potential to address these issues and will be dependent on agreements between the developers, the RSLs and the LPA. This will also be subject to other policies in the LDF.	B
16.	Protect and improve local and global air quality and manage other sources of pollution	All development has the potential to address these issues and will be dependent on agreements between the developers, the RSLs and the LPA. This will also be subject to other policies in the LDF.	B

Table 3: Objectives Compatibility Analysis

		SA Framework Objectives															
Draft Affordable Housing SPD Policies		1. Building Communities	2. Infrastructure	3. Housing	4. Economy & Employment	5. Transport	6. Health	7. Water	8. Waste	9. Climate Change	10. Energy	11. Sustainable Construction	12. Biodiversity	13. Cultural Heritage	14. Landscape	15. Built Environment	16. Pollution
1	A variety of affordable dwelling types and sizes should be provided to meet the wide range of identified housing needs	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?	?
2	Priority is given to the provision of affordable housing for rent. Where 5 or less affordable dwellings are to be provided all should be for social rent. Any additional affordable dwellings provided should be split evenly between social rented and intermediate tenures.	+	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0
3	Affordable housing should be well integrated with market housing in a way which results in different kinds of housing being in close proximity to each other. Large groupings of single tenure dwellings or dwelling types should be avoided.	+	+	+	0	0	+	0	0	0	0	0	0	0	0	+	0
4	Affordable housing should be indistinguishable from market housing in terms of appearance and meet Lifetime Home Standards, Housing Corporation development standards and at least Code for Sustainable Homes Level 3	+	+	+	0	0	+	+	+	+	+	+	0	0	0	+	+

5	Provision should preferably be by a partner Registers Social Landlord, although an alternative provider may be agreed with the Council, subject to criteria.	+	0	+	0	0	+	0	0	+	+	+	0	0	0	0	0
6	Affordable housing land should be made available clean and serviced at nil cost. Reasonable build costs can be required.	+	0	+	0	0	+	0	0	+	+	+	0	0	0	0	0
7	Affordable housing should be reserved for households identified as being in housing need and registered on one of the Council's housing registers, or register such as the Zone Agent's register, approved by them. Nominations will be made by the Councils from those registers.	+	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0
8	Affordable housing should be provided on site except in specific circumstances.	+	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Affordable housing must be available as long as the need exists.	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
10	Service charges should not render dwellings unaffordable	+	0	+	+	0	+	0	0	0	0	0	0	0	0	0	0
11	Affordable housing should be delivered free of public subsidy, unless the use of subsidy would improve the numbers or mix of dwellings in which case the level of subsidy needed should be minimised.	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Affordable housing should be secured through a planning obligation	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
13	An affordable housing statement should accompany a planning application.	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0

Key to Appraisal:

+	Potentially compatible
-	Potentially incompatible
?	Uncertain
0	Not relevant to SA Objective

Table 4: Appraisal of SPD Policies

1. Building Communities		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>A stated aim of this objective is the creation of balanced communities with a range of housing size and tenure and the reduction of social exclusion. The clarification of matters such as provision, management and the integration of affordable housing with market housing will be fundamental to achieving these aims. The SPD also seeks and defines “intermediate” affordable housing which will normally take the form of shared ownership or equity homes. Certainty of provision, and its’ retention in perpetuity will be achieved through the SPD requirement for a section 106 agreement. The SPD requires that opportunities for resident interaction are built into design to assist the creation of cohesive communities. The RSLs have an important role in building communities, particularly on large sites.</p>	<p>The provision of good quality affordable housing (in all forms) should improve social cohesion in and reduce social exclusion. Clarity of expectations and procedure for developers should expedite provision the short and long term.</p>	<p>The SPD requires that affordable housing should be indistinguishable from, and integrated with, market housing and preferably managed by RSLs. This should avoid any cumulative impacts of the stigmatisation that can arise through concentrations of affordable housing.</p>
2. Infrastructure		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The SPD seeks on-site provision wherever possible and as such this maximises use of new infrastructure being provided to serve the “parent” open market site.</p>	<p>There should be no significant effects in the short or long term.</p>	<p>N/A</p>

3. Housing		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The provision of good quality housing for all, including affordable housing, is an objective stated throughout the Council's policy objectives and strategies. Again the provision of a mix of accommodation to meet all needs is fundamental to achieving this aim and is expressed clearly in the SPD as is quality of development. Quality of development is covered clearly in Appendix 1 to the SPD, the Affordable Housing Quality Framework, which adds further detail to the policies in the SPD. The SPD also seeks and defines "intermediate" affordable housing which will normally take the form of shared ownership or equity homes and further widen the opportunities to provide for the needs of all. Certainty of provision and its retention in perpetuity will be achieved through the SPD requirement for a section 106 agreement. Encouraging the construction of homes that are accessible to everybody and where the layout can easily be adapted to fit the needs of future occupants are aims of both the Code for Sustainable Homes and Lifetime Homes, both of which are required in the SPD.</p>	<p>Bringing forward affordable housing through the allocation of, and granting permission for, larger sites may mean delay in provision. Therefore some beneficial effects of provision will probably be felt in the short term with increasing impact as the larger sites are built out; the SPD may speed up delivery by adding certainty and reducing the number of lengthy S106 negotiations.</p>	<p>There should be no adverse impacts or need for mitigation.</p>

4. Economy and Employment		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The provision of both affordable rented and shared equity housing may assist in retaining a young workforce which currently cannot enter the housing market and therefore leave the area. Flexible homes including home working and more affordable housing will have positive impacts in respect of reducing benefit dependency,</p>	<p>As above the time scale for provision will dictate the effects but the long term effects for the economy should be positive; in the</p>	<p>There should be no adverse impacts or need for mitigation.</p>

avoiding benefit trap, and promoting economic activity.	short term benefits should also occur as a result of the SPD as delivery will be speeded up.	
---	--	--

5. Transport		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on transport. Car ownership can be lower amongst residents of affordable housing and will give further reasons for attention to accessibility of the site by public transport and walking and cycling. Level 3 encourages the wider use of bicycles as transport by providing adequate and secure cycle storage facilities, thus reducing the need for short car journeys.</p>	<p>The transport impact of new development has to be carefully managed and it is important that any transport improvements are provided in the short term. The Quality Framework includes standards for cycle parking.</p>	<p>Agreements over issues such as location, the provision of public transport and safe cycling and walking routes can all mitigate against the transport impact of new development.</p>

6. Health		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The relationship between good housing and health is clearly recognised by the Council. Affordable housing should have good access to all community facilities, including doctor's surgeries and sporting facilities. The SPD requires that affordable housing should achieve Code for Sustainable Homes Level 3 and under health the aim is to improve the quality of life in homes through good daylighting and to reduce the need for energy to light the home.</p>	<p>Increasing benefits to health should be seen as more good quality affordable homes are provided.</p>	<p>There should be no adverse impacts or need for mitigation.</p>

<p>The SPD also seeks homes built to Lifetime Home Standards to meet changing needs over time. The involvement of the RSLs can help to improve physical & mental health through their support and advice for example on energy, affordable warmth, and debt management.</p>		
---	--	--

7. Water		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The SPD requires that affordable housing should achieve Code for Sustainable Homes Level 3. The aims are to reduce and delay water run-off from the hard surfaces of a housing development to public sewers and watercourses, thus reducing the risk of localised flooding, pollution and other environmental damage. To reduce the consumption of drinkable water in the home. The Affordable Housing Quality Framework seeks water consumption less than 105 litres per person per day. Level 3 also recommends greywater and rainwater harvesting.</p>	<p>The SPD requires best practice for water management and as such there should be no adverse effects.</p>	<p>There should be no adverse impacts or need for mitigation.</p>

8. Waste		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>As part of a larger site there should be no problem with kerbside recycling collections. Where possible composting facilities should be provided. This is stipulated in the Affordable Housing Quality Framework.</p>	<p>The SPD requires best practice for waste management and as such there should be no adverse effects.</p>	<p>There should be no adverse impacts or need for mitigation.</p>

9. Climate Change		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The SPD requires that affordable housing should achieve Code for Sustainable Homes Level 3. Stated aims are to limit emissions of carbon dioxide (CO₂) to the atmosphere arising from the operation of a dwelling and its services and to reduce global warming from blowing agent emissions arising from the manufacture, installation, use and disposal of foamed thermal and acoustic insulating materials.</p>	<p>All new development will have an impact on climate change from construction through to living in a dwelling. Through the adoption of Level 3 the authority is minimising this impact but there will inevitably be both short and long term impact as the homes and lifestyles will not be carbon neutral.</p>	<p>The authority is adopting best practice advice and standards on the construction of sustainable homes.</p>

10. Energy		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The SPD requires that affordable housing should achieve Code for Sustainable Homes Level 3 and a stated aim is to limit emissions of carbon dioxide (CO₂) to the atmosphere arising from the operation of a dwelling and its services. The code encourages the use of energy efficient lighting. Providing energy efficient homes for those on lower incomes is both environmentally and socially desirable.</p>	<p>Reduced running costs and energy use will be positive in both the short and long term and can encourage other sustainable modes of behaviour.</p>	<p>The cumulative effect of the new development is already being mitigated by the adoption of best practice.</p>

11. Sustainable Construction		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The SPD requires that affordable housing should achieve Code for Sustainable Homes Level 3. The Code sets minimum standards for energy and water use at each level and, within England, replaces the EcoHomes scheme, developed by the Building Research Establishment (BRE). This includes the use of materials.</p> <p>The Housing Corporation sets targets for RSLs to use modern methods of construction to improve sustainability. By requiring RSLs to be involved the SPD is doing a similar thing. Requiring free clean service land will mean RSLs have greater potential to afford to adopt techniques that may add to build costs.</p>	<p>Sustainable construction covers both the embodied energy used in the construction of the dwelling and reduced running costs through the introduction of high levels of insulation from sustainable sources.</p>	<p>The cumulative effect of the new development is already being mitigated by the adoption of best practice.</p>

12. Biodiversity		
Comment	Short/long term effects	Cumulative effects and mitigation
<p>The SPD requires that affordable housing should achieve Code for Sustainable Homes Level 3. which seeks to encourage development on land that already has a limited value to wildlife, and discourage the development of ecologically valuable sites. The provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on biodiversity through part of the site being affordable housing.</p>	<p>The SPD requires best practice with regard to biodiversity and as such there should be no adverse effects.</p>	<p>There should be no adverse impacts or need for mitigation.</p>

13. Cultural Heritage		
Comment	Short/long term effects	Cumulative effects and mitigation
The provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on cultural heritage through part of the site being affordable housing.	There should be no significant effects in the short or long term.	There should be no adverse impacts or need for mitigation.

14. Landscape		
Comment	Short/long term effects	Cumulative effects and mitigation
The provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on the landscape.	There should be no significant effects in the short or long term.	There should be no adverse impacts or need for mitigation.

15. Built Environment		
Comment	Short/long term effects	Cumulative effects and mitigation
The provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on the built environment. The affordable housing component of sites should be as carefully designed as the market housing and the SPD requires that the affordable housing be indistinguishable.	There should be no significant effects in the short or long term.	There should be no adverse impacts or need for mitigation.

16. Pollution		
Comment	Short/long term effects	Cumulative effects and mitigation
Requirement for level 3 housing means that both the global and local aspects of pollution are addressed. Aims of the guidance are to ensure the provision of improved sound insulation to reduce the likelihood of noise complaints from neighbours, and to reduce global warming from blowing agent emissions arising from the manufacture, installation, use and disposal of foamed thermal and acoustic insulating materials.	There should be no significant effects in the short or long term.	There should be no adverse impacts or need for mitigation.

Table 5: Consultation Responses

Affordable Housing Supplementary Planning Document: Analysis of Comments on Written Consultation					
No	Consultee	Ref	Comment	Response	Recommended Change
1	Environment Agency	Appendix 4	Recognition to be given to draft SE Plan Policies CC2 and CC3.	The South East Plan's policies are not yet adopted and therefore the SPD's Sustainability Appraisal addresses these issues through the application of a national recognised standard – the Code for Sustainable Homes Level 3.	No change.
			Policies CS1 and CS2 of the PUSH Draft Environmental Sustainability Policy Framework should be taken into consideration	Only part of the District is within the PUSH area, and therefore the Policy Framework, when finalised, will not apply to the whole District. The Framework is intended to inform each authority's Core Strategy, whereas this SPD supports the adopted Local Plan's policies and takes account of more recent national advice. It therefore appropriately reflects the need to meet the Code for Sustainable Homes.	No change.
			Include SA Objective on Green Infrastructure	This is part of the Health Objective which covers access to open space of all kinds.	No change.
2	Mr Hayter	Appendix 4	The appraisal gives credit for some issues not referred to in SPD. In para 4.11, the SPD does not consider whether social housing can be used for employment purposes.	The reference here relates to Category 1 in the Quality Framework. The issue here is having space within the home for home working for adults and children.	No change

Table 6: SPD Policy Revisions

SPD Amendments/ Revisions to Policy Following Consultation	
1	A variety of affordable dwelling types and sizes should be provided to meet the wide range of identified housing needs.
2	Priority is given to the provision of affordable housing for social rent. Where 5 or less affordable dwellings are to be provided all should be for social rent. Any additional affordable dwellings provided should be split evenly between social rented and intermediate tenures.
3	Affordable housing should be well integrated with market housing in a way which results in different kinds of housing being in close proximity to each other. Large groupings of single tenure dwellings or dwelling types should be avoided.
4	Affordable housing should be indistinguishable from market housing in terms of appearance and meet the design standards set out below . Lifetime Home Standards, Housing Corporation development standards and at least Code for Sustainable Homes Level 3.
5	Provision should preferably be by a partner Registers Social Landlord, although an alternative provider may be agreed with the Council, subject to criteria.
6	Affordable housing land should be made available clean and serviced at nil cost. Reasonable build costs will can be required.
7	Affordable housing should be reserved for households identified as being in housing need and registered on one of the Council's housing registers, or register such as the Zone Agent's register, approved by them. Nominations will be made by the Councils from those registers.
8	Affordable housing should be provided on site except as set out below . in specific circumstances.
9	The affordable housing that is provided must be available as long as the need exists.
10	Service charges should not render dwellings unaffordable.
11	Affordable housing should be delivered free of public subsidy, unless the use of subsidy would improve the numbers or mix of dwellings in which case the level of subsidy needed should be minimised.
12	Affordable housing should be secured through a planning obligation.
13	An affordable housing statement should accompany a planning application.

enfusion

