
South Bucks Local Development Framework

**Affordable Housing
Supplementary Planning Document**

Consultation Draft

Public Consultation Statement

Regulation 12 (a) Town and Country Planning
(Local Planning) (England) Regulations 2012

February 2013



South Bucks
District Council

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1. Purpose of this Statement

- 1.1 This Consultation Statement outlines the ways in which the community and other stakeholders have been engaged in the preparation of a Supplementary Planning Document on Affordable Housing.
- 1.2 The Statement provides information on a workshop held with local stakeholders with an interest in the delivery of affordable housing. It also summarises the comments received and confirms how the issues have been addressed in the draft Supplementary Planning Document (SPD).
- 1.3 This Consultation Statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires, alongside the publication of a draft SPD, a statement setting out:
 - The persons the local planning authority consulted when preparing the SPD;
 - A summary of the main issues raised by those persons; and,
 - How those issues have been addressed in the SPD.

2. Background

- 2.1 The South Bucks Core Strategy recognises the need for more affordable housing, especially in those parts of the District that have the greatest affordability problems and where the existing supply of affordable housing is limited. To address these issues, the Core Strategy includes a policy on affordable housing. Core Policy 3 makes provision for between 350 and 500 affordable homes between 2006 and 2026. The Affordable Housing SPD supports the Core Strategy by setting out how the Council's affordable housing policy will be implemented through the planning process.
- 2.2 The SPD does not include new policies and does not form part of the Council's Development Plan. However, once adopted, the SPD will be a Local Development Document and form part of the South Bucks Local Development Framework. The adopted SPD will form a material consideration in the determination of planning applications alongside Core Policy 3 and other local planning policies.
- 2.3 The draft SPD is supported by separate proposals on the Council's Validation of Planning Applications. The Council has published those proposals for public consultation at the same time as the draft SPD.

3. Stakeholder workshop

- 3.1 On 26 September 2012, the Council held an informal workshop for stakeholders. The purpose of the workshop was to 'test' a pre-consultation draft of the Affordable Housing SPD. Invitations were sent to organisations and companies with a particular interest in the delivery of affordable housing in South Bucks. In addition, the August edition of the Council's Sustainable Development Bulletin newsletter (emailed to more than 270 organisations and individuals) reported that a stakeholder event was being organised, prompting a number of requests for places at the workshop. (A

copy of the August 2012 Sustainable Development Bulletin is included as Annex 1).

- 3.2 Before the workshop, those attending were sent a copy of the pre-consultation draft Affordable Housing SPD, together with some suggested issues for discussion. Workshop participants were also sent, for information, a draft document setting out the Council's proposed local requirements for the validation of planning applications which was prepared alongside the Affordable Housing SPD.
- 3.3 23 people attended the early evening workshop, each taking part in one of 3 discussion groups. Those attending included developers, planning consultants, a Registered Provider of affordable housing, the District Valuer Service, Community Impact Bucks, the South Bucks District Council Portfolio Holders for Sustainable Development and for Health and Housing and officers from the District Council's Development Management, Housing and Planning Policy teams. (Those organisations attending the workshop [as well as those invited who could not attend] are listed at Annex 2). The Council also received comments in a number of follow-up emails (also listed in Annex 2).

4. Main issues raised

- 4.1 Overall, the draft SPD was well-received and the feedback was positive and constructive. The approach set out in the SPD was considered to be in keeping with Core Policy 3 and the preferred process was thought to be workable and (for the most part) clearly set out. The main, more detailed points made at and as a follow-up to the workshop were:
 - More information could usefully be included on the proposed role for the District Valuer Service.
 - There were concerns from the developers that making financial viability appraisals publicly available could prejudice their commercial interests; publication of financial information should therefore be limited to the report from the District Valuer Service.
 - The SPD should include additional information on the use of overage clauses.
 - A number of the developers felt that it is not reasonable for the SPD to state that the submission of a robust and validated financial viability appraisal does not guarantee that the Council will accept a level of affordable housing provision lower than that required by the adopted Core Strategy.
 - A number of participants questioned whether the proposed approach to rural exception sites, based on 100% affordable housing, is consistent with the NPPF.
- 4.2 Other points made were mainly suggestions for minor wording changes or factual updates.
- 4.3 A more detailed summary of the comments received is set out in Annex 3 to this Consultation Statement.

5. Addressing the issues in the Supplementary Planning Document

- 5.1 The comments received at and following the workshop discussion have been used to inform the drafting of the SPD. Annex 3 of this Statement sets out in detail how the comments have been addressed in the draft SPD.
- 5.2 The main changes - none of them major - were as follows:
- Inclusion of text explaining the factors that will be taken in to account when the Council is considering low density schemes of fewer than 5 dwellings on sites of at least 0.16 hectares which could accommodate more homes.
 - Clarification on the role of the District Valuer Service.
 - More information on the role of overage clauses.
 - Confirmation that cross-subsidy of affordable housing with market housing on rural exception sites would be contrary to Core Policy 3.
 - Updates to the paragraphs referring to the Code for Sustainable Homes and to Building for Life.
 - Inclusion of a map showing the 'designated rural areas' in South Bucks.
 - Deletion of the annex setting out indicative property sizes for affordable housing and replacement with additional text in the main part of the document encouraging prospective applicants to contact Registered Providers to discuss affordable housing design.
- 5.3 The stakeholder engagement has made a very positive contribution to the content of the SPD.

6. Next steps

- 6.1 Public consultation on the draft Affordable Housing SPD will run for 8 weeks. This is longer than the minimum 4 weeks required by the 2012 Regulations and the 4-6 weeks required by the Council's Statement of Community Involvement. A Notice will be placed in the local paper, there will be information about the consultation on the Council's web site, and those on the Council's planning policy consultation database will be informed of the opportunity to comment. A response form will be provided for people to record their comments.
- 6.2 At the end of the consultation period, the Council will consider all the representations it receives. The Council will prepare a summary of the comments it receives and the issues raised. Where appropriate, changes will be made to the SPD to address the issues raised. The summary will be reported to Full Council when it is asked to consider the final SPD for formal adoption.

Annex 1:

South BucksAugust 2012 – Issue 6

District Council

Sustainable Development Bulletin

Welcome to the 6th edition of the South Bucks Sustainable Development Bulletin. To subscribe to the monthly Sustainable Development Bulletin please email LDF@southbucks.gov.uk or call a

Planning Policy

The Planning Policy team are currently progressing a number of planning policy documents.

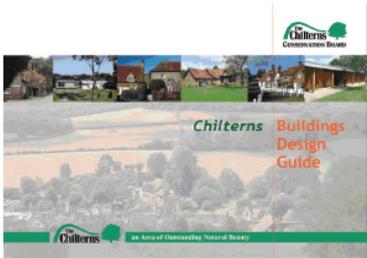
- **Affordable Housing Supplementary Planning Document** - The AHSPD will provide advice on how the Council's affordable housing policy will be implemented through the planning process. A workshop is being organised for late September, to give landowners, developers and other interested parties the opportunity to discuss an early draft of the document. Formal consultation on the draft SPD is currently scheduled for November 2012.
- **Mill Lane Development Brief** - An early draft of the Development Brief has been prepared and reported to the Council's Sustainable Development Policy Advisory Group in July 2012. Formal consultation on the Development Brief is currently scheduled for November 2012.
- **Annual Monitoring Report** - The 2011/12 AMR is scheduled to be published in December 2012. The AMR contains information on new housing permissions and completions, figures relating to new retail and employment floorspace, and a wide range of other facts and figures. One of the main purposes of the AMR is to track the effectiveness of the District's planning policies.
- **Development Management Development Plan Document** - The DMDDP will contain a series of policies that will be used by the Development Management Teams to assess planning applications. The policies in the DMDDP will eventually replace the saved policies in the 1999 Local Plan. Early consultation on this document is scheduled for Spring 2013.

We are also working on a Joint Traveller Accommodation Needs Assessment with the other Buckinghamshire authorities, and hope to start work shortly on a Development Brief for the Wilton Park Opportunity Site, near Beaconsfield.

Chilterns Buildings Design Guide

On the 24th July 2012 the Council endorsed the use of the [Chilterns Buildings Design Guide](#) as a material consideration in determining relevant planning applications. These include developments within, or close to the Chilterns Area of Outstanding Natural Beauty.

The [Chilterns Conservation Board](#) published an updated version of the Design Guide in 2010, incorporating a range of revisions including changes in relevant policy and guidance, and a series of changes brought forward following a public consultation. Reference to the updated Design Guide will enable the Council to implement the aims of Core Strategy Policy 9 (Natural Environment), in particular "to conserve and enhance the Chilterns Area of Outstanding Natural Beauty (AONB) and its setting".



Key Contacts:	Building Control – Planning Applications – Planning Policy – Enforcement –	buildingcontrol@southbucks.gov.uk planning@southbucks.gov.uk LDF@southbucks.gov.uk enforcements@southbucks.gov.uk
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Annex 2: Stakeholders attending the informal workshop on 26 September 2012

- Banner Homes
- Catalyst Housing
- David Parker Architects
- Farmglade
- Kebbell Homes
- South Bucks District Council
 - Deputy Leader & Portfolio Holder for Sustainable Development
 - Portfolio Holder for Health and Housing
 - Officers from the Development Management, Housing and Planning Policy teams
- Berkeley Homes
- Community Impact Bucks
- District Valuer Service
- Inland Homes
- Quod

Follow-up emails received from:

- Banner Homes
- Community Impact Bucks
- District Valuer Service
- Berkeley Homes
- David Parker Architects

Those invited to the workshop who were unable to attend:

- Barratt Homes
- Chiltern District Council
- Housing Solutions Group
- Paradigm Housing Group
- Shanly Homes
- Bromford Housing Group
- Hall Partnership
- L&Q
- Robert Clarke Planning Consultants

Appendix 3: SBDC response to main comments from and following the Stakeholder Workshop held on 26 September 2012

Informal draft SPD section or para. no. (Sept. '12):	Informal draft SPD text:	Issues raised at and following the stakeholder workshop:	Response (additional text shown in red/deleted text struck through):
1	Purpose and status of this Supplementary Planning Document		
1.2	To address these issues, the Core Strategy includes a policy on affordable housing. Core Policy 3 makes provision for between 350 and 500 affordable homes between 2006 and 2026. The policy seeks 40% affordable housing on schemes of 5 units or more or on sites of 0.16 hectares and above.	<ul style="list-style-type: none"> ▪ The wording does not tie in with the full text of Core Policy 3. 	Clarified as follows: To address these issues, the Core Strategy includes a policy on affordable housing. Core Policy 3 makes provision for between 350 and 500 affordable homes between 2006 and 2026. The policy seeks 40% affordable housing on schemes of 5 units or more or on sites of 0.16 hectares and above where there is a net gain in the number of dwellings. Additional footnote included: For further clarification on what sites should contribute, including how the Council will apply the 0.16 hectare threshold, see Section 5.
4	Definition		
		<ul style="list-style-type: none"> ▪ The definition should be extended to include subsidised low cost sale, entry level housing for sale, and private rented accommodation 	Such products fall outside the national definition of affordable housing. No change

		available at below market rents.	required.
		<ul style="list-style-type: none"> ▪ The SPD does not address the facilitation of self-build, serviced plots, affordable self-build and affordable part-finished products. ▪ The SPD should encourage self-build projects in the affordable sector with, for example, land being owner by the RP and provided to the house-owner on a lease. 	The SPD does not preclude alternative models of delivery provided that the affordable housing delivered accords with the national definition as set out in the NPPF. No change required.
5	What sites should contribute		
5.4	The requirement for affordable housing to be provided extends to all types of residential development falling within Use Class C3. For sheltered housing schemes and extra care housing (within Use Class 3) there may be opportunities for on-site sheltered or extra care affordable housing. Where on-site provision would result in management difficulties, developers may be asked to provide affordable housing in the form of a commuted payment.	<ul style="list-style-type: none"> ▪ This proposal will affect the viability of sheltered housing and extra care housing. 	This is not a new proposal. Any financial viability issues for sheltered housing or extra care housing will be dealt with in the same way as other types of residential development. No change required.
5.8	There may be circumstances in which an applicant proposes and is able to robustly justify to the Council a case for a development of fewer than 5 dwellings on a site of 0.16 hectares or more that could accommodate more homes. For example, a developer may propose a	<ul style="list-style-type: none"> ▪ The SPD is not sufficiently clear on the procedure adopted towards sites where a low density scheme is proposed on a site of 0.16 ha or more that could otherwise have accommodated more dwellings at a higher density. 	The Council encourages developers to discuss such schemes on a site-by-site basis at pre-application stage. Clarified para. 6.5 with additional text: Pre-application discussions will clarify the approach to on-site affordable housing provision, including the amount, type, size

	<p>small number of large apartments on a site which the Council considers could accommodate a greater number of smaller apartments. The Council may consider such a scheme favourably. In the limited circumstances where an applicant proposes and justifies to the Council's satisfaction a lower density scheme on a site that could reasonably accommodate higher density development, the Council will, subject to financial viability, expect the applicant to pay a commuted sum in lieu of the affordable housing that would otherwise need to be provided.</p>		<p>and tenure of the affordable housing required. Discussions may also consider whether there are sound planning or other reasons why off-site affordable housing provision or a commuted sum payment may be acceptable in lieu of on-site affordable housing provision. Such discussions will include circumstances where an applicant proposes development of fewer than 5 dwellings on sites of 0.16 hectares or more that could accommodate more homes. Factors that will be taken into account include prevailing densities and the mix of housing in the local area. Inserted paragraph break: Following discussions, there may be circumstances in which the Council and the developer agree that a commuted sum offers the best housing outcome. Where the Council considers that on-site affordable housing provision would be appropriate, but the prospective applicant wishes to propose an alternative approach, the onus will be wholly on the prospective applicant to justify to the Council why off-site provision or a commuted payment should be accepted.</p>
6	Preferred process		
6 (and elsewhere)		<ul style="list-style-type: none"> ▪ Concerns about whether DVS are adequately resourced to support the preferred approach. Suggested service agreement with DVS to avoid 	<p>DVS were represented at the workshop. They have a dedicated viability team of 5 valuers based in Oxford and can call on</p>

		delays.	additional resources in their Reading office. DVS have confirmed that resourcing is not an issue as long as all parties are reasonable in respect of timescales.
6.6	Prospective applicants will also be encouraged to obtain independent advice on financial viability from the District Valuer Service (DVS) at the pre-application stage. The advice will be sought by the Council on the developer's behalf, with the developer paying the costs.	<ul style="list-style-type: none"> The proposed role/payment of DVS should be outlined more clearly. 	Clarified as follows: Prospective applicants will also be encouraged to obtain independent advice on financial viability from the District Valuer Service (DVS) at the pre-application stage. The advice will be sought by the Council on the developer's behalf, with the developer paying the costs. The Council will act as the client of DVS, commissioning advice on behalf of the developer. The developer will pay the cost of the DVS fee to the Council who will then pay DVS on the developer's behalf. The DVS fee will be additional to the Council's charges for pre-application advice. There will be scope for a meeting between the developer and DVS.
7	Off-site affordable housing provision		
		<ul style="list-style-type: none"> Is the starting point for commuted sum payments subject to viability? 	Yes - see final bullet point in para. 7.11. No change necessary.
8	Financial viability		
8.3	The appraisal should be accompanied by an independent assessment of viability produced by the DVS and paid for by the	<ul style="list-style-type: none"> The proposed role of DVS should be outlined more clearly. 	Clarified as follows: The appraisal should be accompanied by an independent assessment of viability

	developer.		<p>produced by the DVS and paid for by the developer. The Council will act as the client of DVS, commissioning advice on behalf of the developer. The developer will pay the DVS fee to the Council who will then pay DVS on the developer's behalf.</p> <p>Added definition of DVS to Glossary.</p>
8.5		<ul style="list-style-type: none"> A number of developers said they would prefer if there was a specified toolkit. 	<p>SBDC does not require the use of a specific toolkit. No change necessary.</p>
8.6	<p>The models rely on the principle of residual valuation which seeks to compare scheme revenue (or gross development value [GDV]) with development costs in order to derive a residual land value. The residual land value can be compared with either the existing use or an alternative use value of the land. Generally, development will not go ahead unless there is a positive residual value and the expected land value exceeds both the existing use and the alternative use value by a margin which the landowner considers to be reasonable given market conditions at the time and any tax obligations associated with the sale of the land.</p>	<ul style="list-style-type: none"> Text could prove unhelpful, placing too much emphasis on the landowner's expectations. 	<p>The text is intended to explain how the principal of residual valuation works, not to set out a policy position. As the text is creating difficulty rather than helping to clarify, amended as follows:</p> <p>The models rely on the principle of residual valuation which seeks to compare scheme revenue (or gross development value [GDV]) with development costs in order to derive a residual land value. The residual land value can be compared with either the existing use or an alternative use value of the land. Generally, development will not go ahead unless there is a positive residual value and the expected land value exceeds both the existing use and the alternative use value by a margin which the landowner considers to be reasonable given market conditions at the time and any tax obligations associated with the sale of the land.</p>

8.8	A planning application submitted with a financial appraisal that argues for no or less than 40% affordable housing or equivalent commuted sum, and allows for a developer return of more than 20%, is likely to be refused planning permission.	<ul style="list-style-type: none"> ▪ Need for further information on how the developer return is defined. ▪ Bank funding currently requires a 20% min. return. ▪ 20% pre-judges what the DVS will consider reasonable. ▪ Suggested 'reasonable' profit rather than 20%. 	<p>Clarified as follows: A planning application submitted with a financial appraisal that argues for no or less than 40% affordable housing or equivalent commuted sum, and allows for a developer return (to cover profits and overheads) of more than 20%, is likely to could be refused planning permission.</p>
8.9 (and elsewhere)	The Council seeks to ensure that the planning application process is as open and transparent as possible. Once submitted with a planning application, a financial viability appraisal will be publicly available.	<ul style="list-style-type: none"> ▪ Developers argued that only the DVS report should be publicly available. South Bucks was reported as being unusual in making publicly available financial viability appraisals submitted with a planning application. Making the information publicly available could prejudice the commercial interests of developers. 	During drafting of the SPD, advice from the Council's Legal Services was that the Council cannot guarantee that the financial viability appraisal will be kept confidential (ie. in response to an EIR or FOI application or an appeal). The legal position has not changed. No change required.
8.12 (also 6.13)	If following consideration of evidence submitted through a viability assessment, the Council agrees that it is not viable to provide 40% affordable housing, the Council may require an overage clause as part of the Section 106 Agreement/Unilateral Undertaking. This is to ensure that if circumstances change, the Council will be able to secure up to the normal full value of developer contributions in the form of a financial contribution used to deliver affordable housing elsewhere in South Bucks.	<ul style="list-style-type: none"> ▪ More information required on the realism and workability of overage clauses - they are not popular with developers. ▪ Overage should be based on factors other than just sales proceeds. ▪ Suggestion that the SPD should include a procedure to allow the Council to review the affordable housing contribution rate if the development is not completed within an agreed timescale. 	<p>Replaced with the following text: Where a developer demonstrates to the satisfaction of the Council that a scheme is not currently viable at the affordable housing target rate and the Council determines that a reduced or zero contribution rate is appropriate, an overage clause will normally be included in the Section 106 Agreement(/Unilateral Undertaking). This sets an agreed completion date for a further appraisal that will be based on achieved development values and actual development costs at that point in time. If a profit of over 20% Gross Development Value (GDV) is achieved</p>

			by the development, the overage clause will normally require the surplus above this profit level to be recouped by the Council up to the remaining balance of the affordable housing contribution at the affordable housing target rate that was applicable at the time of the submission of the latest relevant application.
8.13	The submission of a robust and validated financial viability appraisal does not guarantee that the Council will accept a level of affordable housing provision lower than that required by Core Policy 3. The Council will consider each planning application in the context of the specific development proposal, and take a view as to whether a scheme is of a sufficiently high priority or there are other benefits or circumstances which justify a variation on the Council's affordable housing target. These circumstances will include the Council's land supply position at the time.	<ul style="list-style-type: none"> It is neither reasonable or within the spirit of the SPD to make such a statement given the Council's strong land supply position. The text fails to reflect the wider economic benefits of residential development and the NPPF statements that housing applications should be considered in the context of the presumption in favour of sustainable development. As drafted this paragraph would mean that applications with a valid viability assessment showing that 40% affordable housing (or an equivalent) commuted sum is not viable, may still be refused by the Council. 	Para. 8.13 reflects the range of factors that the Council may take into account in deciding whether to accept a level of affordable housing provision lower than that required by Core Policy 3. The use of overage clauses is designed to mitigate against the risks associated with accepting lower rates of affordable housing provision. No change necessary.
9	Rural exception sites		
9.2	Core Policy 3 allows the development of small-scale sites for 100% affordable housing within or adjacent to villages within specific named (or 'designated') parishes to meet local needs.	<ul style="list-style-type: none"> Is there scope for a proportion of market housing on site to assist delivery? Suggested that the approach does not conform with the NPPF: 'Local planning authorities should in particular consider whether allowing some market housing would facilitate the 	Core Policy 3 requires that rural exception sites should be 100% affordable housing. Any cross-subsidy with market housing would be contrary to policy. Whether the NPPF, as a material planning consideration, enables cross-subsidy to be considered in

		<p>provision of significant additional affordable housing to meet local needs' (NPPF, para. 54). 'Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding' (NPPF Glossary).</p>	<p>these circumstances is a matter of interpretation. In any event, local authorities are only required 'to consider' cross-subsidy which may be allowed 'at the local authority's discretion'.</p> <p>Core Policy is therefore in conformity with the NPPF.</p> <p>Included additional text at the end of para. 9.1 to clarify:</p> <p>Such sites provide 100% affordable housing within or adjoining a rural settlement as an exception to normal planning policy, where appropriate and within the framework set out by local planning policies. The NPPF allows for small numbers of market homes to be allowed, for example where essential to enable the delivery of affordable units without grant funding. However, the NPPF makes it clear that any such cross-subsidy would be at the local authority's discretion. In South Bucks such an approach would be contrary to policy in the adopted Core Strategy.</p>
9.2 and footnote 11	List of designated rural areas		Added map as additional annex.
9.7	To help promote awareness of housing need in rural communities and to increase the amount of affordable rural housing in Buckinghamshire, the Bucks Rural Housing Partnership is supporting the provision of a Rural Housing Enabling	<ul style="list-style-type: none"> ▪ The SPD should allow informal pre-application discussions with the Rural Housing Enabler to allow discussion of potential sites. 	<p>Additional text included at the end of para. 9.7:</p> <p>To help promote awareness of housing need in rural communities and to increase the amount of affordable rural housing in Buckinghamshire, the Bucks Rural Housing</p>

	Service. The District Council will work in partnership with the Rural Housing Enabling Service to help achieve its objectives.		Partnership is supporting the provision of a Rural Housing Enabling Service. The District Council will work in partnership with the Rural Housing Enabling Service to help achieve its objectives. This will include informal pre-application discussions with the Rural Housing Enabling Service to discuss potential sites.
10	Design		
10.4	To ensure that new homes are sufficiently flexible and adaptable to meet changing needs, the Council requires that a proportion of affordable homes are designed to Lifetime Homes standard. The Lifetimes Homes standard is a widely used national standard that goes further than statutory building regulations. It ensures that spaces and features in new homes can readily meet the needs of most people, including those with reduced mobility.	<ul style="list-style-type: none"> Revised requirements were introduced in 2010. These are having a large impact on build costs. Housing associations are dropping the requirement to work to the upgraded version of Lifetime Homes. 	The Council requires that a proportion of affordable homes are designed to Lifetime Homes but does not specify what the proportion is. No change required.
10.5	The new homes will be expected to meet the latest sustainability standards set out in the Code for Sustainable Homes and reflected in Building Regulations. At present the Code is set to level 3, increasing to level 4 in 2013 and zero-carbon in 2016.	<ul style="list-style-type: none"> The statement about CSH is incorrect. 	Clarified as follows: The new homes will be expected to meet the latest sustainability standards set out in the Code for Sustainable Homes and reflected in Building Regulations. At present the Code is set to level 3, increasing to level 4 in 2013 and zero-carbon in 2016. At present, Part L of the Code is incorporated into Building

			Regulations at level 3, increasing to level 4 in October 2013. The current aim in the Core Strategy is that all new homes will be zero carbon by 2016.
10.6 (and footnote 12)	New affordable housing developments should have regard to 'Building for Life'. Managed by a partnership of the Design Council CABE, the Home Builders Federation and Design for Homes, Building for Life promotes high quality design by establishing criteria against which new developments can be judged.	<ul style="list-style-type: none"> Building for Life has recently been updated to Building for Life 12. 	<p>No change required to 10.6 but footnote 12 amended:</p> <p>The criteria cover: environment and community; character; streets, parking and pedestrian spaces and routes; and design and construction.</p> <p>The criteria cover: integrating into the neighbourhood; creating a place; and streets and homes.</p>
	Annexes		
Annex 2	Calculation of indicative commuted sum payments	<ul style="list-style-type: none"> Figures generally considered to be useful, fair and reasonable and welcome in providing certainty. Some questioning of inputs to calculations - there should be an opportunity to discuss them. SPD should clarify whether £112,000 is a maximum. Figures should be index-linked. 	<p>One of the purposes of the consultation is to give people an opportunity to comment on the inputs to the calculation.</p> <p>Para. 7.14 already states that there may be circumstances in which the Council will accept a commuted sum that falls within the range. No change necessary.</p> <p>Para. 7.13 explains that the figures will be reviewed annually and updated if necessary. Similar note added in Annex 2 to clarify.</p>
Annex 2, 13	Calculation of indicative commuted sum payments The starting point for commuted sum	<ul style="list-style-type: none"> Amend to read: 'depending on location and reflecting the likely value of the units on the development site'. 	<p>Text amended as suggested:</p> <p>The starting point for commuted sum payments will be in the range £85,000 to</p>

	payments will be in the range £85,000 to £112,000 depending on location and the likely value of the units on the development site.		£112,000 depending on location and reflecting the likely value of the units on the development site.
Annex 3 (and para 10.3)	Indicative property sizes for affordable homes	<ul style="list-style-type: none"> The sizes quoted here (HC/HCA 2007) have been updated by Lifetime Homes standard July 2010. Whilst not adopted, the HCA Proposed Core Housing Design and Sustainability Standards (March 2010) outlined expected minimum floor areas reflecting the new Lifetime Homes requirements. Any viability report will need to be moderated to reflect the cost of building to Lifetime Homes standards as opposed to HC/HCA 2007. Suggestion that the annex is deleted and replaced with commentary in the viability section stating how costs associated with dwelling size as affected by legislative and local planning requirements will be reflected in viability reports. 	<p>Annex 3 is intended to clarify the position, but is causing difficulty because there have been changes to the standards. To make the document clear and future-proof against further changes in standards, Annex 3 has been deleted.</p> <p>Deleted para. 10.3 and replaced with the following:</p> <p>An indication of the amount of floorspace a housing association will normally expect suitable affordable units to provide is set out in Annex 3.</p> <p>Prospective applicants should contact a RP early in the development process to discuss the design of affordable housing, including the amount of floorspace a housing association will normally expect to be provided.</p>
Annex 5	Building for Life is the national standard for well-designed homes and neighbourhoods. Assessments are scored against 20 Building for Life criteria, covering environment and community; character; streets, parking and pedestrianisation; and design and construction. Building for Life is managed	<ul style="list-style-type: none"> Building for Life has recently been updated to Building for Life 12. 	<p>Replaced definition with following:</p> <p>Building for Life 12 is the industry standard for well-designed homes and neighbourhoods. It is based on the National Planning Policy Framework. Assessments are based on 12 questions, covering connections; facilities and services; public transport; meeting local housing</p>

	by a partnership of the Design Council CABI, the Home Builders Federation and Design for Homes.		requirements; character; working with the site and its context; creating well defined streets and spaces; ease of finding your way around; streets for all; car parking; public and private spaces; external storage and amenity space. Building for Life is managed by a partnership of the Design Council CABI, the Home Builders Federation and Design for Homes.
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