



# **Affordable Housing Supplementary Planning Document**

**Initial Consultation Statement**

**December 2019**

**Reigate & Banstead**  
**BOROUGH COUNCIL**  
Banstead | Horley | Redhill | Reigate



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# 1. Introduction

- 1.1. The Council's policy for provision of affordable housing is set out in Development Management Plan 2019 (DMP) Policy DES6. The Council's draft Affordable Housing Supplementary Planning Document (SPD) provides detailed guidance on implementing Policy DES6. The SPD also includes guidance relating to elements of Policies DES4 regarding housing mix, DES5: Delivering High Quality Homes, and DES7 regarding specialist accommodation.
- 1.2. The Council's current Affordable Housing SPD was adopted in 2014 and provides guidance relating to the Core Strategy Policy CS15, which has since been superseded by DMP Policy DES6. DMP Policies DES6, DES4 and DES7 have been found to be "sound" and consistent with national policy. Other updates to the current SPD are needed for consistency with national policy, including the vacant building credit, and the amended (2019) national planning definition of affordable housing. As the relevant legislation<sup>1</sup> requires there to be no conflict between a SPD and the adopted development plan, the Affordable Housing SPD is being updated to reflect DMP policy. The SPD does not and cannot introduce new policy. It provides clear up to date guidance that, once adopted, will help developers and the Council in implementing DMP Policy. On adoption, it is a material consideration in planning determinations.
- 1.3. To keep evidence up to date, in 2019 the Council commissioned external specialist consultants to prepare a Housing Needs Study for the Council. This included details of current and future type, size and tenure of affordable homes needed. This has also informed the draft Affordable Housing SPD.
- 1.4. This Initial Consultation Statement has been prepared to accompany the draft

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<sup>1</sup> Town and County Planning (Local Planning) (England) Regulation 2012 (Local Planning) Regulations; Regulation 8

SPD for the formal consultation in accordance with the relevant legislation<sup>2</sup>. These require a Consultation Statement to be prepared to accompany the draft SPD which the Council makes available through the formal consultation.

This Initial Consultation Statement should state:

- Who the Council consulted when preparing the SPD
- A summary of the main issues they raised, and
- How those issues have been addressed in the SPD.

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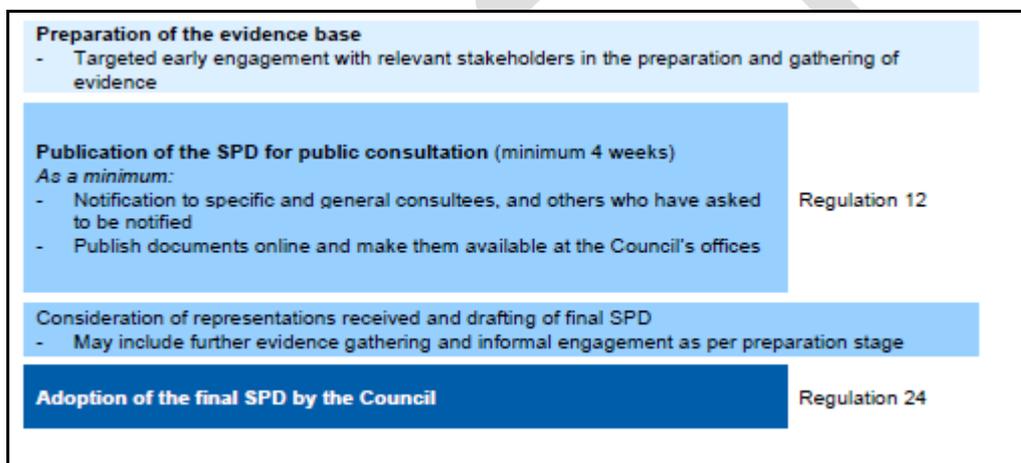
<sup>2</sup> Town and County Planning (Local Planning) (England) Regulation 2012 (Local Planning) Regulations; Regulation 12

## 2. Preparing the SPD

2.1. The process of preparing this draft Supplementary Planning Document (SPDs) has followed legal requirements<sup>3</sup> and the requirements set out in the Council's Statement of Community Involvement in Planning (SCI) (April 2019). The SCI summarises how the Council will engage its communities in its planning functions, including in the preparation of Supplementary Planning Documents (SPDs). The process is summarised in **Figure 1** below.

**Figure 1: Process of preparing a SPD**

Source: RBBC (2019) *Statement of Community Involvement*



**Figure 2: Timeline for preparation of the SPD**

Stage	Date
Early scoping and information gathering	July - August 2019
Preparation of draft SPD with relevant key individuals and organisations	August – October 2019
Consultation on draft SPD with supporting initial	January 2020

<sup>3</sup> Town and County Planning (Local Planning) (England) Regulation 2012 (Local Plan Regulations)

Consultation Statement, SEA/HRA/EqIA screening (minimum of 4 weeks)	
Consider representations received and update draft SPD as relevant	February 2020
Adoption of SPD (and revocation of 2014 AH SPD) by Council's Executive	April 2020
Publish SPD with final Consultation Statement and Adoption Statement	April 2020

2.2. In preparing the Affordable Housing SPD Review, we involved and sought the views from the individuals and organisations listed in **Table 2** below. Their suggestions have been incorporated into the draft SPD for consultation.

2.3. The Council's Housing / Housing Strategy team and Planning Policy met with a Development Management Planning officer and representatives from a couple of housing associations working in the borough. Alongside experience from considering development proposals, this meeting helped to inform the design elements within the draft SPD.

### Next Steps

2.4. The Council is proposing to undertake statutory public consultation on the draft Affordable Housing SPD between 6<sup>th</sup> January and 31<sup>st</sup> January 2020. During this consultation we will invite comments by emailing and writing from interested parties<sup>4</sup>, and we will make the documents available on our website, and in paper format in the main Town Hall and at the six libraries in the borough.

2.5. Following the formal consultation stage, the draft SPD will be amended to take account of consultation responses received and any further relevant

<sup>4</sup> Specific and general consultees, prescribed bodies for the Duty to Co-operate and other individuals and organisations registered on the Planning Policy database for such purpose

information. This Consultation Statement will also be updated with a list of who we consulted, a summary of the comments received, and how those comments have been addressed in finalising the SPD. The Affordable Housing SPD will then be taken to the Council's Executive for adoption. This is currently anticipated to take place in April 2020.

2.6. Following adoption the Affordable Housing SPD will become a material consideration in the determination of planning applications and will therefore need to be taken into consideration in the preparation of planning proposals for residential developments within the borough.

2.7. On adoption of this SPD, the current 2014 Affordable Housing SPD will be revoked. The 2014 Affordable Housing SPD was adopted concurrently with the adoption of the Core Strategy in July 2014 and provides guidance on the implementation of Core Strategy Policy CS15 "Affordable Housing". DMP Policy DES6 supersedes Core Strategy Policy CS15 in its entirety and therefore upon adoption of this SPD the current Affordable Housing SPD will be revoked in accordance with Section 25 of the Planning Act 25 of the Planning Act 2008 and Regulation 15 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

**Table 1: Individuals and organisations involved in preparing the draft SPD**

Person / organisation	Issued / comments raised
<p><b>RBBC Housing Strategy and Projects Manager</b></p>	<p>At meeting on 1/8/19; suggested issues that should be considered by the SPD update include :</p> <ul style="list-style-type: none"> <li>• Existing profile of stock of affordable homes in the borough and turnover of each size and type, as will inform size/type needed in future;</li> <li>• Do not include a draft S106 obligation in the SPD, as can date;</li> <li>• Do not include a list of “preferred Registered Providers in an Appendix, rather refer to contacting RBBC Housing Services and the website hosting a “live” page of providers that can be updated when needed;</li> <li>• Should refer to bedspaces for size units, rather than simply number of bedrooms;</li> <li>• Be specific about need for houses or flats;</li> <li>• Will discuss with Raven Housing (the affordable housing provider in the borough), how a “tenure blind” design can be achieved. For example, potentially social rented on the ground floor with direct ground floor access, and intermediate on 1<sup>st</sup> floor and market housing above, with a shared entrance and a shared “core”;</li> <li>• Meet with Raven Housing (and potentially other RPs active in the area) to</li> </ul>

	<p>consider potential design solutions for tenure-blind design and layout;</p> <ul style="list-style-type: none"> <li>• Also all facilities to be shared across tenures, although noted the potential difficulties with shared ownership and service charges;</li> <li>• If a proposed development is not viable with full policy compliance, could consider first reducing the number of affordable home rather than varying the tenure mix, and / or size and type of affordable homes.</li> <li>• Provided advice on rented tenures and whether “affordable rented” housing is actually affordable to people on the borough’s housing register with regard to Local Housing Allowance.</li> <li>• Advised RBBC Housing Service is currently producing a new Housing Delivery Plan, whose early findings should be taken into account in drafting the revised SDP.</li> </ul>
<p><b>Housing Associations Raven Housing Trust and Orbit, and RBBC Development Management Officer at October 2019 meeting</b></p>	<ul style="list-style-type: none"> <li>• Size of units should be specified in the SPD in terms of “bedspaces” as well as bed-rooms</li> <li>• Design of future schemes – locations of affordable housing on site, clustering, registered providers preference to have separate “cores” or floors for different tenures if they are within the same building.</li> <li>• Tenure mix – preference for variation in the number of affordable home ownership products in order to deliver a greater number of social rented properties.</li> </ul>

- Funding – discussion regarding how registered providers bid for properties and therefore need not to be prescriptive to require identification of Registered Providers early in the planning process.
- Discussion regarding the number of units that registered providers will be willing to accept on-site.
- Cascade – preference for variation in the number of units in order to achieve desired tenure mix.

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