



**Consultation Statement for the Planning
Obligations Supplementary Planning
Document (SPD)**

November 2019

Consultation Statement for the Planning Obligations Supplementary Planning Document (SPD)

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Introduction

1. This statement sets out the work involved in preparing the Planning Obligations Supplementary Planning Document (SPD) and how the Council has involved the community and various stakeholders in its preparation.
2. In line with Regulation 12 of the Town and Country Planning (Local Planning) (England) 2012 regulations and with the Wycombe Revised Statement of Community Involvement (July 2018), this statement provides details of:
 - (i) the persons the local planning authority consulted when preparing the supplementary planning document;
 - (ii) a summary of the main issues raised by those persons; and
 - (iii) how those issues have been addressed in the supplementary planning document (SPD)
3. After the public consultation on the draft SPD, this consultation statement will be updated to reflect the feedback received and how this has been taken into account in the final version of the SPD. The final consultation statement will be published alongside the SPD for adoption.

SPD preparation and early stakeholder and community engagement

4. The draft Planning Obligations SPD was prepared following a review of the previous guidance, Planning Obligations Supplementary Planning Document (SPD) (April 2013).
5. Officers initially scoped the content of the earlier SPD document. The sections to be included in the SPD were identified and then the best source of obtaining information on these various topic areas determined.
6. In addition, officers considered what additional issues have arisen that needed to be addressed within the updated Supplementary Planning Document.
7. Recent examples of Planning Obligations SPD produced by other local authorities were also looked at to see if they covered any issues that would be beneficial to also consider for Wycombe District.
8. A paper setting out the key issues that the new SPD document needed to address was produced. This paper formed the basis for various officer level meetings about the contents of the SPD document.

9. This included meetings and email exchanges with internal and external bodies on the content of the draft SPD.

Who and how did we consult when preparing the supplementary planning document

10. On 11 September 2019 a presentation was given to the Agents' Panel, which consists of local agents and developers with an interest in planning in the Wycombe area on the proposed content of the Planning Obligations SPD.
11. This was followed in the evening by a presentation to the Citizens' Panel, which consists of a range of individuals representing various organisations with an interest in planning issues in Wycombe District.
12. Both presentations were followed by a question and answer session which allowed those attending to raise issues about the proposed content of the SPD and question its scope in more detail.
13. On the 26 September 2019 a further presentation was given on the Planning Obligation SPD to the Wycombe Development Housing Forum. This group consists of a number of different Registered Providers who are active in Wycombe District, as well as Housing Officers from the Council.
14. Following these presentations, the issues raised were considered in detail by officers and the Planning Obligations SPD amended accordingly.
15. The final section of this document includes a table setting out the main issues raised during the various presentations on the SPD and how we have taken these issues into account when preparing the draft Planning Obligations SPD for consultation.

Summary of the main issues

The following table summarises the main issues raised by stakeholders during the preparation of this draft SPD, and how those issues have been addressed in the supplementary planning document.

Main issue	Council response	Change to the SPD?
By the Council giving priority to the equity share approach, the affordable housing is only available for a limited time period and isn't available in perpetuity.	The Council acknowledges that this is correct. However, the same point can also be made with regard to shared ownership. The equity is however still available for future provision of affordable housing.	The Planning Obligations SPD sets out the Council's preference in terms of intermediate affordable products but continues to advocate the equity share approach as one of its preferred choice of tenures.

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Some scenarios might want 100% rented on certain sites and less on others. Therefore need flexibility with 80/20 split.	The Council acknowledges that this might indeed be the case with landowners with multiple sites. This would need to be discussed on a case by case basis.	No change required.
For intermediate housing tenures, the preference should be shared ownership	Agree.	The Planning Obligations SPD sets this as its preferred intermediate tenure.
What if a new form of affordable housing tenure comes along which provides similar benefits to those in the intermediate tenure list?	If that occurs the Council will need to review and update the SPD.	No change needed at this stage but a review might be required in the future.
How does it affect self-build – is that additional to the 48%?	Yes. Self-build properties are not necessarily affordable. This issue will be picked up in the SPD.	Self-build section included within the Planning Obligations SPD.
A key consideration is how much is paid for the land.	It is clear from the latest NPPF and the PPG that this shouldn't impact on the amount of affordable housing provided on a site.	A section has been included in the Planning Obligations SPD setting out how Viability should be considered in planning applications.
For commuted payments, it would be useful to have a formulaic approach so that it is clear what payment is expected upfront.	The Council agreed to look into this further.	Reference to the online calculator has been included in the Planning Obligations SPD and, once complete, will be put on the Council's website.
Would these calculations be rounded up or down?	Wouldn't matter if you were using an online calculator.	No change.
How does vacant building credit work? Was the VBC included in the viability assessment?	The VBC wasn't included in the Whole Plan Viability Study.	A section on the VBC and how it works has been included in the Planning Obligations SPD.
Self-build – development of 200 flats, how do you deal with self-build?	Requirement only applies to houses.	No change.

Main issue	Council response	Change to the SPD?
Viability assumptions would be helpful – RICS professionals needed?	Agreed that this should be clarified in the SPD.	A section dealing with Viability issues has been included in the SPD.
With 48% affordable housing requirement concerned how attractive the district is now for national house buildings.	Will need to be pragmatic and monitor housing delivery going forward.	This issue was discussed at the Examination Hearings and is outside the scope of the SPD.
Is there scope to keep contributions etc local post unitary	At this stage, we don't know the answer to this question.	No change to the SPD.
Can we ensure that AH contributions collected in the S106 for the AONB are ring fenced for the AONB?	Unless house building is taking place within the AONB it would be quite difficult to target this expenditure within the AONB.	No change to the SPD although the Council will try, as far as possible, to spend this money within the AONB.
Does this link in with the validation checklist?	Yes	No change required.
In places like Marlow the high property values make shared ownership expensive. Would be useful if in high value areas that we could set the rent levels at a lower level and/ or open up the living and working criteria.		To be considered as an issue for unitary council. No change picked up in the SPD.
Eligibility for shared ownership. Could we extend the salaries above the Help to Buy Shared Ownership limit of £80,000 - to help purchasers in higher value areas of the district	There is a danger that taking this approach could lead to issues as it would go against the rules within which shared ownership operates.	Not picked up in the SPD.
Will nominations for these new affordable housing units apply just to WDC or across the new Bucks area following unitary?	Initially the intention is for the SPD to just apply to Wycombe District but it is likely that this might change when the new unitary comes into place depending on the new Council's priorities.	
The RPs suggested that a 'cascade' arrangement was put in place in S106	At the present time we don't know what approach the new	No change to the SPD.

Main issue	Council response	Change to the SPD?
<p>agreements to cover any occupancy priorities. This may potentially be for different client groups (such as military personnel) or by sub-area once the Unitary is in place.</p>	<p>Council executive / members will take, so I don't think this issue can be addressed via the SPD.</p>	