



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

Includes the results of Public Consultation and  
Summary of Changes made to the SPD.

**March 2020**



# 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. Wycombe District Council formally consulted on a draft version of the Planning Obligations Supplementary Planning Document (SPD) over six weeks from 25<sup>th</sup> November to 5<sup>th</sup> January 2020.
4. This consultation statement has been updated to reflect the feedback received and how this has been taken into account in the final version of the SPD. This final consultation statement will be published alongside the SPD for adoption.

## **Habitat Regulation Assessment/ Strategic Environmental Assessment Screening**

5. The Revised Habitats Regulations Assessment (HRA) - including Appropriate Assessment (January 2019) and Habitats Regulations Assessment of the Proposed Main Modifications for the Wycombe District Local Plan (February 2019) concluded that the Plan will not lead to any adverse effects, either alone or in combination with other plans or projects, on the integrity of the Special Areas of Conservation (SAC) in or near the District. This included an individual assessment of policies in the plan.
6. The Planning Obligations Supplementary Planning Document provides additional guidance on the application of various policies in the Development Plan. The SPD does not introduce further potential linking impact pathways. As such it does not change the conclusion in the Habitats Regulations Assessment.
7. It is a requirement that Sustainability Appraisal (SA) is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and

Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on strategic environmental assessment (SEA).

8. In terms of the Environmental Assessment of Plans and Programmes Regulations 2004, this SPD does not significantly affect the findings of the Sustainability Appraisal (which incorporates SEA within it) undertaken for the Wycombe District Local Plan, as it will not introduce anything that would result in any new or significantly different environmental problems than have already been considered through the SA for the Local Plan.

## **SPD preparation and early stakeholder and community engagement**

9. The draft Planning Obligations SPD was prepared following a review of the previous guidance, Planning Obligations Supplementary Planning Document (SPD) (April 2013).
10. 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.
11. In addition, officers considered what additional issues have arisen that needed to be addressed within the updated Supplementary Planning Document.
12. 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.
13. 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.
14. 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 draft supplementary planning document

15. 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.
16. This was followed in the evening by a presentation to the Community Panel, which consists of a range of individuals representing various organisations with an interest in planning issues in Wycombe District.
17. 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.
18. 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.
19. Following these presentations, the issues raised were considered in detail by officers and the Planning Obligations SPD amended accordingly.

## Summary of the main issues raised

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

<b>Main issue</b>	<b>Council response</b>	<b>Change to the SPD?</b>
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.
Some scenarios might want 100% rented on certain sites and less on	The Council acknowledges that this might indeed be the	No change required.

<b>Main issue</b>	<b>Council response</b>	<b>Change to the SPD?</b>
others. Therefore need flexibility with 80/20 split.	case with landowners with multiple sites. This would need to be discussed on a case by case basis.	
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 include 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.
Viability assumptions would be helpful – RICS professionals needed?	Agreed that this should be clarified in the SPD.	A section dealing with Viability issues has

Main issue	Council response	Change to the SPD?
		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 agreements to cover any occupancy priorities. This	At the present time we don't know what approach the new Council executive / members will take, so I	No change to the SPD.

Main issue	Council response	Change to the SPD?
may potentially be for different client groups (such as military personnel) or by sub-area once the Unitary is in place.	don't think this issue can be addressed via the SPD.	

## SPD Formal Public Consultation

21. As set out above, formal public consultation took place on the draft Planning Obligations SPD between 25<sup>th</sup> November 2019 and 5<sup>th</sup> January 2020. Six responses were received to the SPD during this time period.
22. People were made aware of the consultation through:
  - Notifying statutory consultees and generic and specific stakeholders on our consultation database including parish councils.
  - Including information about the consultation in the Weekly Bulletin which goes out to interested individuals and organisations.
  - Placing hard copies of the SPD in local libraries and the Council's Reception Area. All of the consultation material was made available on the Council's website, including a response form.
  - A consultation event was held on Wednesday 4 December 7 - 9.30 pm, which was open to all. The purpose of the event was to provide a brief outline of the contents of the Planning Obligations SPD and also to offer an opportunity to ask any questions.
23. The table below summarises the responses received to the public consultation and the Council's response to them. It also outlines any changes made to the SPD as a result of these comments.

**Table summarising the key issues raised in the consultation and the Council’s response to them**

<b>Ref.</b>	<b>Respondent</b>	<b>Main issue</b>	<b>Council response</b>	<b>Change to the SPD?</b>
1.	<b>Historic England</b>	Historic England does not wish to make any substantive comments on this document at this time.	No response needed.	No change.
2.	<b>Natural England</b>	Welcome the opportunity to see the SPD but consider that it's unlikely to have major impacts on the natural environment. Provide advice relating to biodiversity, landscape enhancement and protecting species for inclusion in future SPDs.	No response needed at this stage but points will need to be considered as part of the Biodiversity Offsetting SPD.	No change.
3.	<b>RPS on behalf of Halsbury Homes</b>	Object to the consultation being rushed through over the Christmas period.  Reserve the right to make further comments in the light of this.	Noted. However, comments will not be accepted after the deadline.	No change.
		There is no mention whatsoever of the PRESPD in this latest draft document and only two mentions to the PR expansion proposals. This is a significant omission. This SPD should be setting out an innovative and flexible approach for PR if it is to be delivered in the timescales required.	Noted.	No change.

		<p>No discussions at all have taken place with key stakeholders in the development industry that we are aware of before this SPD was unexpectedly published.</p>	<p>This is incorrect. The Wycombe District Local Plan made it clear that this SPD would be produced and a timetable for the SPD work was given to the Inspector a part of the Examination.</p> <p>Two workshops were held on the 11<sup>th</sup> September 2019 - one for Agents/ Developers and another for a Community Panel to discuss the emerging SPD. In addition, a further discussion took place on 26<sup>th</sup> September 2019 to discuss the emerging SPD with register providers in the area.</p> <p>In addition, an evening briefing session was held during the SPD's consultation period to discuss any issues</p>	<p>No change.</p>
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			raised in the SPD with officers.	
	Para. 6/ Paras 166-168	<p>There is no indication in this document as to what additional policy development is proposed beyond that already contained in the 2019 Wycombe District Local Plan.</p> <p>It is not clear how precisely the local plan policies are being supplemented.</p> <p>Provide a specific example relating to Community Facilities and the inclusion of the standard of 0.14 sqm per person which they state pre-dates the Local Plan and should be removed.</p>	It is considered that as there is no reference to the Community Facilities standard in the adopted Local Plan that this reference should be removed from the SPD.	Removed the reference to the Community Facilities standard from the SPD.

	Para. 140	The Open Space section refers to the fact that separate SPDs are being produced for a number of sites including the PR Expansion Area. This text should make it clear that due to the specific issues associated with bringing forward large complex schemes, they must be dealt with on an individual basis rather than in the context of this guidance that is primarily directed at the consideration of day to day planning applications.	Agreed. Will add some wording to this effect to the SPD.	The SPD has been changed to more clearly reflect the fact that for some larger sites such as the reserve sites and the Princes Risborough Expansion Area that separate SPDs have been produced or are in the process of being produced.
	Para. 163	In the Education section it suggests that the expansion area will involve “the delivery of a new school within the vicinity of the development or expansion area”. A new secondary school associated with the PREA is not, and never has been, included in the Local Plan or the draft SPD for the expansion area. This reference thus must be deleted.	Agreed.	Delete the reference to ‘for secondary school provision’ from this sentence of the SPD.

	<p>Viability section esp. paras. 48-65</p>	<p>This section should specify that major schemes such as the PREA will be dealt with principally in the context of specific Supplementary Planning Documents that deal with the particular issues associated with bringing them forward and which allow for negotiation and creative solutions to providing infrastructure and other components of such schemes. Applying the potential 'one size fits all' approach on viability to the PREA would unnecessarily restrict the scope for negotiation and innovation to secure delivery of the project</p>	<p>I am not aware of any differences to the approach being taken to viability in Princes Risborough when compared to the rest of the sites in the Local Plan and, as such, do not think that this change is necessary.</p>	<p>No change.</p>
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	<p>Para. 48</p>	<p>The clear implication in paragraph 48 of the document is that the Whole Plan Viability Study of May 2017 has resolved all viability issues because the Local Plan Inspector found the plan sound is entirely misleading.</p> <p>National policy in National Planning Policy Guidance makes it clear that changes in circumstances regarding the information underpinning the viability of Local Plans can be introduced when considering decisions on individual proposals.</p> <p>One obvious example of such a change of direct relevance to the PREA is the fact that the Inspector considering the Local Plan was not informed that any Housing Infrastructure Fund (HIF) monies received by the council to support off-site infrastructure and a key part of the viability assessment would need to be refunded.</p>	<p>Para. 48 states correctly that the starting point for the Local Plan is the Whole Plan Viability Report.</p> <p>Viability is always subject to changing circumstances and the policy allows for reconsideration if things change. Further guidance on viability has however been added to the SPD to address this issue.</p> <p>In relation to HIF, this is a recoverable grant so there is head room for it to be repaid. If viability is tight then this would not happen so this comment is not relevant.</p>	<p>No change.</p> <p>Further guidance has been added to the SPD to address the issue of when a Viability Appraisal is likely to be required and the circumstances for this.</p> <p>No change.</p>
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Is	General	As with the equivalent Princes Risborough consultation draft, stakeholders cannot be expected to 'tease out' the relevant policy proposals from a document that does not even attempt to distinguish existing policy from supplementary guidance and general text.	This is a standard approach i.e. setting out what the Local Plan says and supplementing it with more detailed information.	No change.
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4	<p><b>Redrow Homes</b></p> <p>Pages 16-17 (CIL)</p>	<p>The relationship between planning obligations and CIL should be set out more clearly for each infrastructure item.</p> <p>This is not helped by the lack of any formal report on CIL spending to date and expectations for future spending, though it is acknowledged that such reports will become mandatory under the new CIL (Amendment) Regulations 2019. Such information needs to be made available as soon as possible.</p>	<p>S106 are site specific and can be utilised to deliver off-site improvements (inc. physical, social and environmental) that are needed as a result of the development.</p> <p>The Planning Officers and Developers agree s106 Heads of Terms during the planning process, which includes negotiating amount of s106 payable, triggers, conditions etc.</p> <p>Contributions are then spent accordingly.</p> <p>CIL is a non-negotiable contribution that is collected at fixed points throughout the development process, depending on the scale of development. The latest CIL rates are published on the WDC website and there is a</p>	No change.
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			<p>CIL calculator available on the WDC website, which provides developers with an indicative CIL liability.</p> <p>WDC currently publish their CIL spend annually on their website.</p>	
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	<p>Page 18 (Triggers)</p>	<p>Trigger points within legal agreements for the payment of financial contributions or undertaking works should be reflective of the relative need for that piece of infrastructure, rather than applying a base assumption that the trigger will be on commencement of development.</p> <p>Similarly, as planning obligations must meet the statutory tests laid out in the CIL Regulations there should be no reason why the council requires a period of 10 years in which to spend any financial contributions. If the triggers have been set at a sensible point in the development's phasing and the obligation has been evidenced to be necessary to support the development then a period of five years should be more than sufficient.</p>	<p>CIL is triggered upon commencement of developments. S106s are negotiated and so the trigger points in them will be variable.</p> <p>A time limit of 10 years is considered more appropriate as large projects span a number of years and may not come forward within a 5 year timescale. Many projects are funded using different contributions and thus depend on when development comes forward thus a 10 year time limit is more appropriate.</p>	<p>No change.</p>
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	<p>Page 19 (Viability)</p>	<p>Caution should be applied in assuming the Whole Plan Viability Study (May 2017) represents an accurate picture of the viability on a site specific basis, especially as it has not been updated since the modified Local Plan policy on affordable housing provision at 48% of units.</p> <p>For example the appraisal for Terriers Farm shows affordable housing provision at 42.8% and seemingly no allowance has been made for off-site works (such as highways improvements), formal sports or education. Additionally the mix of affordable housing used does not appear to reflect the preferred tenure mix of 80% rent / 20% intermediate, as the floorspace of the shared ownership units appears to represent over half of the floorspace of all of the affordable units.</p> <p>For this reason we would urge the council to apply reasonable flexibility to the collective policies of the local plan, so as not to require a full-scale viability assessment to be undertaken in all cases. The affordable tenure split between rented and intermediate is an</p>	<p>See the response on this issue to RPS on behalf of Halsbury Homes above.</p> <p>If the policy requirements aren't met then a viability assessment will be required. Further detail has been added to the SPD to outline what the Council will be specifically looking for in its Viability Appraisals.</p>	<p>No change.</p>
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		example of a requirement that would benefit from flexibility to ensure the scheme remains viable, without the need for a full-scale assessment which is costly and time intensive for both the applicants and the local planning authority.		
	Pages 28-29 (Affordable housing for rent)  esp. Para. 82	This text sets out a requirement that affordable rent levels must not exceed the Local Housing Allowance (LHA) rate, in case the tenants need assistance from Housing Benefit. However the LHA is only applicable to tenants in the private rented sector, with no such caps on housing benefit for tenants in the social housing sector. It is therefore inappropriate to refer to LHA in this way.	It is recognised that the LHA is used to calculate Housing Benefit for tenants renting from private landlords but the housing service wishes to have this limit in place for affordable housing for rent, to assist with affordability for tenants on lower incomes and for households affected by the benefit cap.	No change.

	<p>Page 33 (Distribution of affordable housing)</p>	<p>With the council applying a policy of nearly half the units on a development site being affordable, it makes it extremely challenging to distribute these units in 'small groups' across the site. A more realistic expectation would be for the 'affordable housing to be distributed across the site'.</p>	<p>The proportion of affordable housing agreed will vary across sites, in accordance with Policy DM24 of the adopted Wycombe District Local Plan. It is important that as far as possible, the affordable housing is distributed in groups across the site rather than being located in one particular area.</p>	<p>Amend the SPD accordingly.</p>
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	<p>Page 39 (Self-build)</p>	<p>In seeking to apply a policy of 5% self-build plots on developments over 100 houses, the Council has offered no guidance on how this would work from a practical point of view. On a large development site there are many considerations such as health and safety, legal liability and phasing that mean such provision would be by no means a simple undertaking and could be unfeasible in many situations.</p> <p>It would be useful for the council to publish information on how many households are registered on the self-build list that they maintain, to provide evidence on the level of demand in the district. Nevertheless it is requested that this policy is applied on a flexible basis for each development site, taking into account site specific considerations and identified need.</p>	<p>In terms of the mechanism for securing self-build plots this will be done through the use of a legal agreement.</p>	<p>SPD wording amended to reflect this clarification.</p>
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5	<p><b>Persimmon Homes</b></p> <p>Table 1 (page 15) &amp; Page 39</p>	<p>Re self-build plots WDC have not identified any specific mechanism to achieve the policy requirement.</p> <p>Where plots are not sold it is important that the Council's policy is clear as to when these revert to the developer. At present this policy makes no such provision and as such is ineffective.</p> <p>It is therefore recommended that this requirement is applied on a case by case basis and only applied where appropriate for the site context.</p>	<p>The mechanism by which this will be procured is through a legal agreement.</p>	<p>Reference to the legal agreement will be included in the SPD.</p>
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	<p>Page 18, Para 45.</p>	<p>Concerned that the Council is applying a base assumption that financial contributions will be paid on commencement of development. Trigger points for payment of infrastructure should mirror the actual need for their provision and not request that contributions are made potentially years in advance of infrastructure being implemented.</p> <p>There is no reason why the Council requires a 10 year period to spend financial contributions and PHNL object to this proposed timeframe.</p> <p>The generally accepted timeframe for which payments are to be utilised for the intended purpose is 5 years from date of payment. Given that payments are usually staggered appropriately from planning approval, commencement or later trigger, it is considered that any contribution which has not been used, as intended, within 5 years from date of payment, would now be rendered obsolete.</p> <p>We strongly argue that a maximum 5 year time limit is imposed.</p>	<p>Para 37 of the Draft SPD allows for the possibility of payment on anniversaries, on occupations or staged payments so long as it secures infrastructure when it is needed. This would be a trigger point “reflective of the relative need”. We’ve not applied a base assumption of commencement in all cases – the second half of para 37 allows for exception cases.</p>	<p>See the trigger point response to Redrow above.</p>
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	<p>Viability Pages 19-22</p>	<p>Object to paras 58 and 59 which are ambiguous as to when viability reviews will be required and will take place.</p> <p>This is contrary to the National Planning Practice Guidance- Viability, which accompanies the NPPF, which clearly states that plans should ‘set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles.’</p>	<p>See Policy DM19: Infrastructure and Delivery of the Adopted Delivery and Site Allocations Plan.</p>	<p>No change.</p>
	<p>Page 26- worked example table</p>	<p>Object to the ambiguity in the worked example regarding the rounding up of affordable housing required. It is not clear from the SPD as to when part affordable homes should be rounded up to obtain a whole dwelling provision (e.g. only when exceeding 0.49, always). It is proposed that the option of a part payment for an affordable housing unit should be permitted when calculations for provision result in a part dwelling provision.</p>	<p>The issue of when rounding should take place is specifically addressed in bullet point 7 of the SPD at the bottom of page 26 of the SPD.</p>	<p>No change.</p>

	Page 33 para 104	Paragraph 104 states that 'on larger sites, defined as those containing 50 dwellings or more, the Council would expect the affordable housing to be distributed in small groups across a site'. With a requirement of 48% of dwellings to be affordable housing how they can be distributed in small groups? PHNL proposes that this is reworded to allow for affordable housing to be distributed across the site.	See the response to Redrow Homes - Distribution of affordable housing – which raises the same point.	See above.
6	<b>Gladman</b>  General comment	The Wycombe District Local Plan was examined against the 2012 NPPF. It is therefore important that the SPD is flexibly worded and consistent with the requirements of national planning policy. The Council will need to ensure that the SPD does not act to restrict the delivery of market and affordable housing and instead provides clarity to members of the development industry bringing schemes forward in a timely manner without placing onerous requirements which may threaten development viability.	Agreed	No change

		<p>Gladman wish to remind the Council that any requests made for developer contributions must meet the obligations tests as set out in paragraph 56 of the NPPF 2019.</p> <p>It is suggested that the Council make clear which stakeholder is responsible for the request and, where possible, the delivery of each contribution tied to a development.</p>	<p>Agreed this is acknowledged in the SPD (see the Summary, para. 12 of the SPD and Appendix 3 refers to para. 56 of the NPPF).</p> <p>Each planning application is dealt with on its own merits including planning obligations, which are discussed by the Planning Officer and Developer throughout the planning process. Contributions may be linked to specific identified projects as part of s106 agreements, which the Council currently does.</p>	<p>No change</p>
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		Any request made for contributions should be done as soon as practicable during the planning application process in order to aid efficiency of the determination process and allow time for negotiation within the statutory timescale if required.	Agreed	No change
		In terms of delivery of infrastructure and monies collated from a development, Gladman request that information regarding how and where this is delivered is shared with the applicant in order to illustrate that the obligations tests have been met.	<p>The requirement to seek planning obligations forms part of the planning process, certain agreements state where funding should be spent and others contribute to wider schemes.</p> <p>The Council publishes Annual Monitoring Reports as to how it spends s106 contributions. The new requirements for reporting under the CIL Regulations 2010 (as amended) set out how Authorities report the developer contributions collected and spent.</p>	No change

		Note the inclusion of triggers in the SPD. Gladman support the inclusion of triggers and the use of this approach, however it is important that the correct triggers are applied for the various obligations and that these are agreed through discussions with the applicant.	See the trigger point response to Redrow above.	No change.
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## Other changes made to the SPD prior to its adoption

24. In addition to the changes set out above made as a result of consultation responses to the SPD, a number of other changes were made to the SPD. These changes and the reasons for them are set out below;
25. Work was started in-house on an **Air Quality SPD** around the time that consultation on this SPD was taking place. A number of references to the Air Quality SPD were consequently added to the draft Planning Obligations SPD;
26. Text relating to the fact that a **development which is already demonstrably part of a potentially larger development** will require affordable housing on a pro-rata basis was already included within the draft Planning Obligations SPD but not included in the summary table.
27. A reference was therefore added to the summary table and specific examples included in the SPD, setting out how this provision is likely to work in practice. The reason for this change was that a couple of cases have recently arisen which involved this provision and consequently it was felt that further clarification of this issue would be useful;
28. A change was made to the SPD to clarify the relationship between the **Affordable Housing Policy DM24** and **Policy DM41- Optional Technical Standards for Building Regulation Approval**;
29. **Education** – change made to what constitutes a large site from 50 to 100 to correct an inconsistency in the document between the summary table and the main text;