

Appendix 1

Affordable Housing SPD

Report of Public Consultation

Ref no:	Respondent	Organisation/Company	Summary of Comments	Council Response
71635	John Coleman	William Davis	SPD ignores other intermediate tenures included in the NPPF and therefore is contrary to Policy H2. The SPD should make specific reference to the definitions in Annex 2 of the NPPF.	Agreed. Text amended to reference further intermediate tenures as per Annex 2.
71624	Rosamund Worrall	Historic England	No comments.	Noted
71625	Sharon Jenkins	Natural England	No comments.	Noted
71626	Sarah Jones	Barton Willmore on behalf of IM	SPD should be expanded to reference additional paras of the NPPF and PPG.	In the interests of brevity we do not feel that the SPD needs to repeat parts of the NPPF and PPG unless specifically necessary (such as Annex 2 included in the appendices).
71626	Sarah Jones	Barton Willmore on behalf of IM	SPD should stipulate that Neighbourhood Plan policies are not expected to seek in excess of the Local Plan policy requirement, and that any that do must be the subject of a neighbourhood plan viability assessment.	It is for each Neighbourhood Plan, its public consultation process and its subsequent examination to determine the appropriateness of its policies, including conformity with the strategic policies of the Local Plan. It would be inappropriate for this SPD to set requirements to be applied to all future NPs.
71627	Sarah Jones	Barton Willmore on behalf of IM	The 'site size' should be reworded so that it is clear that barriers such as land ownership and landowner intentions are accounted for. Further, redraft to be clear that the Council is not seeking to control the density of developments beyond where density is being used to purely circumvent the provision of affordable housing.	The site size section already details the considerations undertaken by the Council. Where sites are functionally dependent on each other (for example) it may be appropriate to consider them as a whole and an affordable housing requirement placed. We do not feel that the additional considerations suggested merit inclusion.

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				The SPD states that the Council will have regard to density within the context of sites avoiding the 10 dwelling threshold. Appropriate density is already a consideration in all applications as per Local Plan policy BE2, and so there is no risk that the SPD will harm development density on sites that are responding appropriately to the policy and environmental context.
71628	Sarah Jones	Barton Willmore on behalf of IM	Support for the site viability section. The SPD should refer to the PPG approach on viability and viability assessments to ensure consistency with national policy.	Noted, although references to the PPG are considered superfluous within the SPD as NPPF and PPGs will need to be considered alongside the Local Plan and all other relevant policy documents.
71629	Sarah Jones	Barton Willmore on behalf of IM	Clarification on whether land is included in off-site contribution. It should be demonstrated that the uplift calculations do not go beyond the Local Plan 40%. Text should clarify that financial contributions should be rounded down.	The text is already clear with regards to compliance with H2 regarding provision of land. The explanatory text already demonstrates that the uplift provides for 40% affordable housing once the additional market dwellings are considered. There is no intention for financial contributions to be rounded down and the table already makes it clear that numbers are rounded up, in line with elsewhere in the SPD.
71630	Sarah Jones	Barton Willmore on behalf of IM	Flexible approach to tenures, types and sizes is supported, and could be strengthened by references to site-specific circumstances. Encouragement for bungalows should note the potential implications for site design and density.	Support is noted although additional examples will not be added in the interests of brevity. Site specific implications as a result of bungalow provision will be reviewed on a case-by-case basis. Bungalows are encouraged, but will be assessed in the context of compliance with other policies of the Development Framework.
71631	Sarah Jones	Barton Willmore on behalf of IM	Any future environmental DPD should take into account of the governments Future Homes Standards consultation (2019)	Noted and agreed that the future DPD will need to take this into account.

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71632			The Section106 template should be clearer that some elements of information requested will not be finalised at the point of an outline application (such as the overall housing mix)	The template is provided as a starting point of negotiation and this Council's expected outcomes. Should some information be unavailable at the point of negotiation then this will be addressed in a case-by-case basis. The text will be amended to emphasise this.
71633	Sarah Jones	Barton Willmore on behalf of IM	The timescales and triggers for delivery should provide for deviations from the proposed to provide flexibility	The template is provided as a starting point of negotiation and this Council's expected outcomes. The timescales and triggers include constitute best practice. Should site-specific information require different triggers then this will be considered on a case-by-case basis.
71634	Sarah Jones	Barton Willmore on behalf of IM	It is considered unnecessary for the standards of construction to be included in the legal agreement as they will be a part of designs and plans of the approved application.	The inclusion of such provisions within the template 106 is considered appropriate, irrespective of documents that may have been submitted as part of the planning process.
71622	Jayne Topham	Warwick Town Council	Support the proposed document.	Noted.
71621	Richard Timothy	Highways England	No comments.	Noted.
71623	Reiss Graham	HS2	No comments.	Noted.
71683	Malwina Idziac	Canal & River Trust	No comments.	Noted.
71592	Anna	Delta Planning on behalf of AC Lloyd	The Government will soon be releasing a White Paper to introduce the concept of First Homes, the SPD should include this now.	Whilst we recognise that policy changes may occur, it is not appropriate to second guess the nature of unreleased White Papers, and so have not include potential future models of Affordable Housing.
71593	Anna	Delta Planning on behalf of AC Lloyd	The SPD should make clear that although on-site provision is a priority alternative can be considered where appropriate was permitted by Policy H2	We feel that this point is already sufficiently made within the Local Plan and in the chapter of the SPD that relates to alternative provisions.

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71594	Anna	Delta Planning on behalf of AC Lloyd	Fractions should be rounded up and down to ensure development is delivered at the most appropriate levels	Given the Affordable Housing requirement in the District the most appropriate level of provision is provided by rounding any fractions upwards.
71595	Anna	Delta Planning on behalf of AC Lloyd	Definition of “smaller schemes” when regarding conversion schemes. And, these issues could be present for larger schemes, and some allowance should be made for individual assessments so the off-site contributions can be used when appropriate.	The mention of a small conversion scheme is merely by way of an example of a circumstance that might struggle to provide its AH requirement on site. It is clearly not intended to be an exhaustive list of possible circumstances, and broadening the example would serve no useful purpose.
71596	Anna	Delta Planning on behalf of AC Lloyd	Conflict between p18 and 20 with regards to tenure split.	Noted. The text will be amended to resolve the conflict.
71597	Anna	Delta Planning on behalf of AC Lloyd	Some of the bullet points in the draft S106 will only be provided at reserved matters stage,	Noted. The text will be amended to emphasise the principle that this is provided as a comprehensive template to be amended as circumstance dictates.
71598	Anna	Delta Planning on behalf of AC Lloyd	Conflict with NPPF in terms of limitation on rural exception sites, too restrictive, and the use of the words “small scale” are ambiguous	Section 7 details that rural exception sites will need to respond to the nature and size of existing settlement. The definition of small cannot therefore be set to a specific number as that will depend on the location, as well as other factors. We do not feel that there is a fundamental contradiction between the NPPF and the adopted Local Plan policy H3 which uses the words “small in scale”.
71599	Anna	Delta Planning on behalf of AC Lloyd	2 year consent for rural sites considered too restrictive given the overwhelming need for affordable housing in the district as a whole.	We feel that the slightly shortened consent is appropriate in rural exception sites to ensure that the provision of such affordable housing happens quickly, and solely for the purpose of needed AH provision.

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71600	Anna	Delta Planning on behalf of AC Lloyd	Self build housing can be a form of affordable housing and this should be mentioned within the SPD	Noted and agreed, self build will be referenced.
71601	Anna	Delta Planning on behalf of Deeley Group	The Government will soon be releasing a White Paper to introduce the concept of First Homes, the SPD should include this now.	Whilst we recognise that policy changes may occur, it is not appropriate to second guess the nature of unreleased White Papers, and so have not include potential future models of Affordable Housing.
71602	Anna	Delta Planning on behalf of Deeley Group	The SPD should make clear that although on-site provision is a priority alternative can be considered where appropriate was permitted by Policy H2	We feel that this point is already sufficiently made within the Local Plan and in the chapter of the SPD that relates to alternative provisions.
71603	Anna	Delta Planning on behalf of Deeley Group	Fractions should be rounded up and down to ensure development is delivered at the most appropriate levels	Given the Affordable Housing requirement in the District the most appropriate level of provision is provided by rounding any fractions upwards.
71604	Anna	Delta Planning on behalf of Deeley Group	Definition of “smaller schemes” when regarding conversion schemes. And, these issues could be present for larger schemes, and some allowance should be made for individual assessments so the off-site contributions can be used when appropriate.	The mention of a small conversion scheme is merely by way of an example of a circumstance that might struggle to provide its AH requirement on site. It is clearly not intended to be an exhaustive list of possible circumstances, and broadening the example would serve no useful purpose.
71605	Anna	Delta Planning on behalf of Deeley Group	The preferred tenure split is unclear as conflicting information is provided. Definitions of tenure could assist in making the requirement clear.	Noted. The text will be amended to resolve the conflict.
71606	Anna	Delta Planning on behalf of Deeley Group	The details to be submitted are applicable to full planning applications only.	Noted. The text will be amended to emphasise the principle that this is provided as a comprehensive template to be amended as circumstance dictates.

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71607	Anna	Delta Planning on behalf of Deeley Group	Conflict with the NPPF in terms of limitations on rural exemption sites, definitions are needed.	Section 7 details that rural exception sites will need to respond to the nature and size of existing settlement. The definition of small cannot therefore be set to a specific number as that will depend on the location, as well as other factors. We do not feel that there is a fundamental contradiction between the NPPF and the adopted Local Plan policy H3 which uses the words "small in scale".
71608	Anna	Delta Planning on behalf of Deeley Group	2 year consent too restrictive to boost rural affordable housing.	We feel that the slightly shortened consent is appropriate in rural exception sites to ensure that the provision of such affordable housing happens quickly, and solely for the purpose of needed AH provision.
71609	Anna	Delta Planning on behalf of Deeley Group	Self build housing can also be a form of affordable housing and this should be referenced within the SPD	Noted and agreed, self build will be referenced
71647	Leonie Stoate	Tetlow King on behalf of West Midlands Housing Association Planning Consortium	SPD cannot vary the JSHMA mix and should retract the proposed mix. SPD should remove all requirements to retain affordable housing in perpetuity unless explicitly relating to rural exception sites	It is appropriate for SPDs to add additional detail to policies, such as a revision to the evidence base as long as such revision do not introduce new policy or exceed the existing Local Plan policies. Revising the preferred mix of affordable housing without altering the overall provision is considered appropriate for an SPD. The Local Plan already contains the provision for AH to remain affordable in perpetuity (see Policy H2 g) and para 4.21) and so the SPD will retain this requirement.
71649	Leonie Stoate	Tetlow King on behalf of West Midlands	Support for the integration of AH throughout sites, although consider the term "pepper-potting" outdated and	Noted. A non-binding range for a "small cluster" will be provided as a guide to aid developers.

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		Housing Association Planning Consortium	imprecise. "Small cluster" should have a size or range applied to it.	
71684	Nicole Burnett	Gladman Developments	Support the recognition that tenure split may need revising with more up-to-date evidence in the future. However, emphasis should be made that although this is the preferred split, in some circumstances negotiations can take place to vary this.	P18 already states underneath the table of tenure split "These may vary site by site and early engagement with Council officers is recommended, who will be able to advise the required tenure mix for a specific site"
71685	Nicole Burnett	Gladman Developments	Note that the typology mix differs from the SHMA. Urge that the SPD makes clear that mix is a guide rather than a fixed requirement, with the specific mix discussed on a site by site basis	As above.
71686	Nicole Burnett	Gladman Developments	Note that the Government will soon launch a "First Homes" White Paper consultation and that the SPD may need updating in the future to remain consistent with Government objectives	Noted, and any relevant updates will be made in due course, should they be required.
71687	Kathryn Ventham	Barton Willmore on behalf Barwood	SPD should be expanded to reference additional paras of the NPPF and PPG.	In the interests of brevity we do not feel that the SPD needs to repeat parts of the NPPF and PPG unless specifically necessary (such as Annex 2 included in the appendices).
71688	Kathryn Ventham	Barton Willmore on behalf Barwood	SPD should stipulate that Neighbourhood Plan policies are not expected to seek in excess of the Local Plan policy requirement, and that any that do must be the subject of a neighbourhood plan viability assessment.	It is for each Neighbourhood Plan, its public consultation process and its subsequent examination to determine the appropriateness of its policies, including conformity with the strategic policies of the Local Plan. It would be inappropriate for this SPD to set requirements to be applied to all future NPs.
71689	Kathryn Ventham	Barton Willmore on behalf Barwood	The 'site size' should be reworded so that it is clear that barriers such as land ownership and landowner intentions are accounted for.	The site size section already details the considerations undertaken by the Council. Where sites are functionally dependent on each

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			Further, redraft to be clear that the Council is not seeking to control the density of developments beyond where density is being used to purely circumvent the provision of affordable housing.	<p>other (for example) it may be appropriate to consider them as a whole and an affordable housing requirement placed. We do not feel that the additional considerations suggested merit inclusion.</p> <p>The SPD states that the Council will have regard to density within the context of sites avoiding the 10 dwelling threshold. Appropriate density is already a consideration in all applications as per Local Plan policy BE2, and so there is no risk that the SPD will harm development density on sites that are responding appropriately to the policy and environmental context.</p>
71690	Kathryn Ventham	Barton Willmore on behalf Barwood	Support for the site viability section. The SPD should refer to the PPG approach on viability and viability assessments to ensure consistency with national policy.	Noted, although references to the PPG are considered superfluous within the SPD as NPPF and PPGs will need to be considered alongside the Local Plan and all other relevant policy documents.
71691	Kathryn Ventham	Barton Willmore on behalf Barwood	Clarification on whether land is included in off-site contribution. It should be demonstrated that the uplift calculations do not go beyond the Local Plan 40%. Text should clarify that financial contributions should be rounded down.	The text is already clear with regards to compliance with H2 regarding provision of land. The explanatory text already demonstrates that the uplift provides for 40% affordable housing once the additional market dwellings are considered. There is no intention for financial contributions to be rounded down and the table already makes it clear that numbers are rounded up, in line with elsewhere in the SPD.
71692	Kathryn Ventham	Barton Willmore on behalf Barwood	Flexible approach to tenures, types and sizes is supported, and could be strengthened by references to site-specific circumstances.	Support is noted although additional examples will not be added in the interests of brevity. Site specific implications as a result of bungalow provision will be reviewed on a case-by-case

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			Encouragement for bungalows should note the potential implications for site design and density.	basis. Bungalows are encouraged, but will be assessed in the context of compliance with other policies of the Development Framework.
71693	Kathryn Ventham	Barton Willmore on behalf Barwood	Any future environmental DPD should take into account of the governments Future Homes Standards consultation (2019)	Noted and agreed that the future DPD will need to take this into account.
71694	Kathryn Ventham	Barton Willmore on behalf Barwood	The Section106 template should be clearer that some elements of information requested will not be finalised at the point of an outline application (such as the overall housing mix)	The template is provided as a starting point of negotiation and this Council's expected outcomes. Should some information be unavailable at the point of negotiation then this will be addressed in a case-by-case basis. The text will be amended to emphasise this.
71695	Kathryn Ventham	Barton Willmore on behalf Barwood	The timescales and triggers for delivery should provide for deviations from the proposed to provide flexibility	The template is provided as a starting point of negotiation and this Council's expected outcomes. The timescales and triggers include constitute best practice. Should site-specific information require different triggers then this will be considered on a case-by-case basis.
71696	Kathryn Ventham	Barton Willmore on behalf Barwood	It is considered unnecessary for the standards of construction to be included in the legal agreement as they will be a part of designs and plans of the approved application.	The inclusion of such provisions within the template s106 is considered appropriate, irrespective of documents that may have been submitted as part of the planning process.
71697	Andrew Lowe	Turley on behalf of Taylor Wimpey	Taylor Wimpey believes that there is considerable scope to refine the draft SPD in order to ensure that the Council's aspirations are met, without stifling development or compromising viability. These are set out in our attached representations and subsequent responses	Noted. We feel that the SPD provides suitable guidance and flexibility in order to deliver appropriate development with the much-needed levels of affordable housing.
71968	Andrew Lowe	Turley on behalf of Taylor Wimpey	This section must be amended to acknowledge that the principal evidence	We disagree, the JSHMA remains relevant. A review of the JSHMA will occur in line with the

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			<p>base, the 2015 JSHMA, is outdated and potentially inconsistent with subsequently revised national policy and guidance.</p> <p>It should also explicitly recognise the value of secondary datasets for the purposes of assessing local housing needs within villages and rural areas, and make clear that such alternatives to primary household surveys exist</p>	<p>Plan Review, and if substantial changes in emphasis or need occur as a result then this SPD will be reviewed and refreshed at that point.</p> <p>Household surveys remain the best way of demonstrating and articulating the housing need within a small area. The use of housing registers does not differentiate between need emanating from within a locale and those that want to move from elsewhere, therefore we retain our preference for household surveys where used appropriately to supplement need demonstrated in the JSHMA.</p>
71699	Andrew Lowe	Turley on behalf of Taylor Wimpey	<p>The SPD must aim to provide the greatest possible flexibility, avoiding unnecessary financial burdens and allowing schemes to reflect their local context. Acknowledging the dated nature of the JSHMA will ensure that there remains sufficient scope and flexibility to depart from the specified mix of affordable housing types and tenures where justified by more up-to-date evidence.</p> <p>Taylor Wimpey objects to the proposed rounding of fractions, as any calculations must accord with standard mathematical principles.</p> <p>The methodology for calculating off-site financial contributions should be revised</p>	<p>See response to rep 71968 regarding the JSHMA.</p> <p>Given the overwhelming need for affordable housing in the District we need to ensure that sites provide the maximum volume of affordable housing possible. A review of other authorities Affordable Housing policies reveal some policies that round all fractions up, some that round all fractions down and some that round to the nearest whole numbers. We are therefore satisfied that the approach is suitable and established.</p> <p>The off-site contribution calculation ensures that 40% affordable housing is provided per development. Clearly if a site is providing 60 market dwellings on site, the contribution should equate to 40 affordable dwellings off-site</p>

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				(thereby equalling a total of 100 units built with a 60/40 split).
71701	Andrew Lowe	Turley on behalf of Taylor Wimpey	The draft SPD must be amended to recognise the value of secondary datasets for the purposes of assessing housing needs, as an alternative to primary household surveys that have inherent limitations.	See response to rep 71698
71707	Jessica Graham	Savills on behalf of Lioncourt Strategic Land	<ul style="list-style-type: none"> - the percentage of Social Rent should be reduced further to enable the mix to achieve the requirements of NPPF paragraph 64. - the proposed housing mix table should be removed from page 19 and the 'Housing Types and Sizes' section of the SPD should be amended to 'encourage' the development of more two and three bed affordable dwellings. - the requirement for 5% of affordable rented properties to be bungalows should be removed. - clarity is sought on the requirement for the proposed Starter Home restrictions 	<ul style="list-style-type: none"> - The full text of the NPPF (para 64 in conjunction with footnote 29) make it clear that shared owner should be 10% of the overall affordable housing contribution from a site. - The wording already in place is unambiguous in stating that the mix is guidance and that mix and tenure is to be negotiated and agreed with Housing Services. - There is no requirement set for bungalows, but there is a note that they are encouraged. - The sales restriction set for Starter Homes is set at 15 years to ensure that they are developed for genuine starter homes and are not quickly resold or rented. The significant requirement for affordable dwellings justifies this approach.
71708	Tom Biggs	St. Joseph Homes	<ul style="list-style-type: none"> - We request that additional wording is added to describe the conditions whereby variance from the tenure split would be acceptable. - We request that the Council do not 	- The provided tenure split is already caveated with the note that it will vary from site to site and that engagement and negotiation with Council officers is advised. We do not consider further wording necessary.

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			<p>completely discount 1-bedroom shared ownership units completely.</p> <p>- We request the Council consider the social value contribution made by developments when calculating the affordable housing contribution.</p>	<p>- Whilst we do not prefer 1-bedroom shared ownership units for the reasons given in the SPD, the table is guidance and should be negotiated with Council officers. Additional text will be added to make this clearer.</p> <p>- Whilst we note St Joseph's commitment to other areas of developing a site (such as landscaping, public realm, etc.) it would not be appropriate to factor this into reducing overall affordable housing requirements.</p>
71716	Kate Low	Pegasus on behalf of Northern Trust	Northern Trust welcome the confirmation that the definition of affordable housing applied is as per that set out in the NPPF at Annex 2.	Noted.
71717	Kate Low	Pegasus on behalf of Northern Trust	The draft text suggests that a ' <i>threshold of 10 units</i> ' will be applied when considering affordable housing provision in new schemes. This does not accord with Local Plan Policy H2 which sets a threshold of 11 or more dwellings, or a total floor space of over 1,000m ² . The wording set out in the draft SPD should be amended to accord with Local Plan Policy H2.	The NPPF places the threshold as 10, and therefore the SPD follows the highest tier of document available. The Local Plan policy will be reviewed and altered during Plan Review.
71718	Kate Low	Pegasus on behalf of Northern Trust	Northern Trust support the recognition that some development proposals may be unable to meet all of the relevant affordable housing requirements whilst remaining viable and deliverable. Northern Trust support the requirement to submit a viability assessment where this is the case.	Noted.

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71719	Kate Low	Pegasus on behalf of Northern Trust	Northern Trust welcome the Council's recognition that the tenure split may be revised by subsequent SHMA's or successor document to represent the most recent and robust evidence which Northern Trust welcome and fully support. In this regard, and noting that the SHMA Update is based upon data which is some 5 years old, it would important that the SPD confirms that this evidence base will be updated in a timely manner noting the NPPF's requirement to deliver a wide range and variety of homes.	The provision of a robust evidence base is requirement set in the NPPF, is reconfirmed in the Local Plan. It is therefore not felt necessary to state again in the SPD.
71720	Kate Low	Pegasus on behalf of Northern Trust	Mix doesn't take into account the risks of single occupants in two-bedroom properties paying the "bedroom tax". Insufficient flexibility overly prescriptive rules from Councils can delay developments, and Northern Trust encourages the Council to be more flexible. There is no sufficient evidence regarding bungalow need.	The 'bedroom tax' does not apply to those that rent a shared ownership property. We believe that there is sufficient flexibility and guidance in the SPD to help developers speed up rather than slow down the production of appropriate planning applications and developments. The SPD encourages the provision of bungalows but does not make it a requirement. The issue of insufficient evidence is therefore irrelevant.
717121	Kate Low	Pegasus on behalf of Northern Trust	The commentary provided under this subheading relating to Starter Homes and Discount[ed] Market Sales is confusing and no context is provided as to the purpose of this text. However, in respect of the starter homes, it is assumed that this text relates to the proposed restriction period for the	Noted. This information is provided within the context of retaining affordability, and an amendment will be made to make this clear. The starter home and discount market sales resale provision is set at a level that reflects the significant levels of affordable housing requirement in the District. The wording for

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			<p>resale of starter homes. It is important that any such restriction period is properly considered and evidenced noting the impact that having a restricted period which is too long can make it difficult for first-time buyers to move on to a larger (or smaller) new home and can put off first-time buyers from taking up such products.</p> <p>It is unclear what the text relating to Discount[ed] Market Sales relates to or its purpose and we would reserve the right to comment on this further once this has been made clear. Nevertheless, we would note that references to 'determined by local incomes' in considering what is market value does not accord with the definition of such affordable housing within the NPPF.</p>	<p>starter homes restrictions will be amended to clarify that re-selling is possible as long as it is to eligible applicants at the appropriate discount, thereby addressing the concern regarding first-time buyer's ability to move on.</p>
71722	Kate Low	Pegasus on behalf of Northern Trust	<p>Northern Trust support the recognition that affordable homes should be pepper potted across larger schemes, yet still provided in clusters. Providing small clusters allows for easy management of properties by Registered Providers.</p>	<p>Noted.</p>
71723	Kate Low	Pegasus on behalf of Northern Trust	<p>Although Northern Trust do not object to the suggested timescales for delivering affordable homes, or the need to ensure that affordable homes are delivered in a timely manner, it is recommended that a degree of flexibility is applied to this approach to take into account schemes where it can be demonstrated that, as a</p>	<p>The provided text is part of the template Section 106, appended to the SPD. Whilst the template articulates the strong preference of the Council, there may be unique site circumstances that mean that the delivery of affordable housing needs to be amended. These negotiations will take place during the drafting of the legal agreement.</p>

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			<p>result of viability or phasing requirements, it would not be possible to bring forward the affordable housing in the manner envisaged through the draft SPD. It is therefore recommended that the suggested timescales will be applied unless evidence is provided to allow slight amendments to the timescales for affordable delivery.</p>	