

Charnwood Local Development Framework

Affordable Housing
Supplementary Planning Document

**Statement of Main Issues
Raised through Public
Consultation**

September 2005

**Affordable Housing Supplementary Planning Document
Statement of Consultation of Main Issues Raised through Public Consultation**

I. INTRODUCTION

Under the Planning and Compulsory Purchase Act 2004¹ a local planning authority shall not adopt a Supplementary Planning Document until:

- Representations made in respect of the draft SPD have been considered;
- A statement is prepared setting out a summary of the main issues raised in these representations and how these main issues have been addressed in the SPD which it is intended to adopt.

This document sets out the main issues raised through public consultation on the draft Affordable Housing SPD and indicates how these main issues were addressed in revising the SPD for adoption.

19 responses have been received on the SPD. The responses include comments from the Housing Corporation, House Builders Federation, CPRE, Action for a Better Charnwood, several developer interests, 2 Parish Councils and the Government Office for the East Midlands.

2. MAIN ISSUES RAISED THROUGH CONSULTATION AND HOW THE ISSUES WERE ADDRESSED

	MAIN ISSUES	RESPONSE TO ISSUE
1	Number paragraphs for easier identification of sections. This is relevant for all consultation documents.	The SPD is amended to number sections and paragraphs to enable ease of reference to the document.
2	Concerns that the SPD is inconsistent with the Local Plan as well as national policy	<p>The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. It will ensure a consistent approach for each individual proposal for housing development where the negotiations for affordable housing will take place on a site by site basis.</p> <p>The SPD builds upon policies H/4, H/5 and H/6 of the adopted Local Plan and subject to changes set out in this document it is considered that it will be consistent with existing national, regional and local policy. See responses to Main Issues 4, 5, 7, 8 and 9. Also, the SPD is amended to delete reference to Section 54(a) of the 1990 Act as it is now superseded by Section 38(6) of the Planning and Compulsory Purchase Act 2004 and to take into account the recently published Circular 05/2005 'Planning Obligations' which</p>

¹ Regulation 18(4)(b) of the Town and Country Planning (Local Development) (England) Regulations 2004.

		supersedes Circular 1/97.
3	The robustness and transparency of the Housing Needs Survey 2003 has been questioned, in terms of calculation of a minimum 30% target and the Council's preference for affordable units to be provided as social rented housing	<p>The Housing Needs Survey 2003 updates the survey referred to in the Local Plan which is 1995 based. The summary was included to set out the background for the draft SPD. The Housing Needs Survey is prepared in line with the OPDM's research paper 'Local Housing Needs Assessment: A Guide to Good Practice'. The Survey recommends a level of 30% should be used to negotiate for affordable housing.</p> <p>In terms of the target, a minimum of 30% was chosen because:</p> <ul style="list-style-type: none"> • The Housing Needs Survey recommends a level of 30% should be used to negotiate for affordable housing. • A large proportion of the overall housing requirement up to 2016 is committed and providing affording housing at a percentage considerably lower than the current identified target; • Recent provision of affordable housing, from all sources, is about 100 affordable units per year and predicted to continue at this rate, also considerably lower than 30% of the overall requirement; • House prices have risen considerably compared to incomes since the survey and so increasing the number of households who are unable to buy or rent a property in the general housing market. <p>In terms of the Council's preference for social rented housing:</p> <p>The Housing Needs Survey indicates that 52% of concealed households had an annual income of £15,000 or less and that a further 17% had an annual income of between £15,001 and £23,000. A total of 69% of concealed households therefore have incomes of £23,000 or less. In February 2003 the price of a 2 bed 'access' terraced house ranged from £70,000 in Loughborough to £86,950 in the settlements fringing Leicester. It is also calculated that a household income of £23,000 may just about give access to a shared ownership property priced at</p>

		<p>£80,000. Newly built shared ownership properties provided through Section 106 Agreements tend to be valued more highly than existing properties. Therefore it is difficult to gain access to such properties at this cost and many are unsuitable in terms of size and location to the concealed households who want to access them. Since the survey house prices have risen more quickly than incomes and so the level of need is likely to be higher. The needs of the existing households, for example in unsuitable housing, also have to be taken into account.</p> <p>In short, shared ownership is not in practice affordable for a large proportion of households in housing need in Charnwood. It is considered therefore that the preference for 75% social rented housing is justifiable.</p> <p>The SPD is amended to update the references to the Housing Needs Survey 2005 and Housing Market Assessment, to expand the justification for the preference for social rented housing. Appendix 2, the full summary of the Housing Needs Survey 2003, is deleted.</p>
4	<p>There is not sufficient reference to the issues of site economics, viability and the consideration of other planning objectives being taken into consideration. This was considered contrary to Circular 6/98 'Planning and Affordable Housing'.</p>	<p>The Council recognises that the economic viability of a site is a relevant issue. However, it considers that it is the responsibility of the applicant to demonstrate through a full financial appraisal that a site will not be viable for development if it is required to fully adhere to the policies set out in the draft SPD. It also recognises that there may be instances where the provision of affordable housing would prejudice the realisation of other planning objectives. To clarify, the SPD is amended to make reference to costs affecting viability to bring the SPD in line with Circular 6/98 'Planning and Affordable Housing'.</p> <p>The Council considers that the lack of availability of public funding is not a reason for not providing affordable housing. However, it is considered that reference is made to guidance on Housing Corporation funding. The SPD is amended to make reference to guidance on Housing Corporation funding and the fact that non Registered Social Landlords are able to access such funding so that developers are</p>

		aware of relevant guidelines and funding sources.
5	The reduction of the site size threshold for rural settlements of less than 3000 population to 5 dwellings is contrary to the adopted Local Plan Policy	In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD is amended to delete the section relating to thresholds for rural settlements of 3000 population or less.
6	The requirement to adhere to Housing Corporation standards in terms of design is not justifiable.	The Council will expect a high standard of design for affordable housing as it expects for market housing. The Council has approved for adoption the Supplementary Planning Document 'Leading in Design' which sets out guidance to encourage, promote and inspire higher design standards for development. This is in line with key principles in PPS1 to pursue sustainable development, climate change, high quality design and creating sustainable and safe communities. The most recent Government statement, the Consultation Paper 'Planning for Housing Provision' (July 2005) states that 'The aim is that the planning system is used to its maximum effect to ensure the delivery of new homes that are well designed, make the best use of land, are energy efficient, make the most use of new building technologies and help to deliver sustainable development'. However, it is recognised that Housing Corporation standards cannot be required for non-funded schemes. The SPD is amended to clarify where relevant design standards will apply as Housing Corporation standards can only be required where Housing Corporation funding is given.
7	The need to recognise that the definition of	The Council's considers that the involvement

	affordable housing includes low cost market housing and subsidised housing as well as social rented housing, and therefore, that different management arrangements will be appropriate in terms of seeking long term affordability	of Registered Social Landlords will ensure that the property remains affordable and is occupied by local people in housing need in the long term. However, it is recognised that there are other management arrangements will have to be considered for the different types of affordable housing. The SPD is amended to recognise that there are other management arrangements, as opposed to Registered Social Landlords, will have to be considered for the different types of affordable housing.
8	Circular 05/2005 'Planning Obligations' indicates that planning conditions are preferable to planning obligations.	Although the Council's preference for Section 106 Agreements remains, the SPD is amended to clarify that the use of planning conditions will not be precluded.
9	As Section 106 agreements are entered into voluntarily, the wording should be amended to 'The Council will seek to enter into a Section 106 Agreement'.	It is agreed that a section 106 Agreement is entered into on a voluntary basis. The SPD is amended to read: 'The Council will seek to enter into a Section 106 Agreement'.
9	Seeking 'additional benefits' from financial contributions is contrary to Circular 05/2005 'Planning Obligations'.	The draft SPD indicates that a commuted sum/financial contribution must be large enough to ensure that the same number and type of affordable units can be secured on an alternative site. There may be additional costs to the Council in finding an alternative site or spending a financial contribution which it is expected will be part of the make-up of the financial contribution. However, it is considered that it is not appropriate to seek additional benefits over and above those that would have been provided on site. The SPD is amended to delete the last sentence relating to off-site provision and to delete the two sentences: 'The developer will have to prove ... proposals will have to be exceptionally attractive' relating to financial contributions as these are contrary to Circular 05/2005 'Planning Obligations'.

To summarise, the key changes are set out below:

- a) To number sections and paragraphs to enable ease of reference to the document;
- b) To update the references to the Housing Needs Survey 2005 and Housing Market Assessment. Appendix 2, the full summary of the Housing Needs Survey, will also be deleted;
- c) To delete reference to Section 54(a) of the 1990 Act as it is now superseded by Section 38(6) of the Planning and Compulsory Purchase Act 2004;

- d) To take into account the recently published Circular 05/2005 'Planning Obligations' which supersedes Circular 1/97;
- e) To clarify that the Council will take into account costs affecting site viability to bring the SPD in line with Circular 6/98 'Planning and Affordable Housing';
- f) To make reference to guidance on Housing Corporation funding and the fact that non Registered Social Landlords are able to access such funding so that developers are aware of relevant guidelines and funding sources;
- g) To delete the section relating to the reduced threshold of 5 dwellings for rural settlements of 3000 population or less as this is contrary to the Local Plan;
- h) To clarify where relevant design standards will apply as Housing Corporation standards can only be required where Housing Corporation funding is given;
- i) To recognise in the policy statement that other management arrangements, as opposed to Registered Social Landlords, will have to be considered for the different types of affordable housing.
- j) To clarify that the use of planning conditions will not be precluded as this would be contrary to Circular 05/2005 'Planning Obligations';
- k) To amend the statement on Section 106 agreements to read: 'The Council will seek to enter into a Section 106 Agreement' as such agreements are entered into voluntarily;
- l) To delete the last sentence relating to off-site provision and to delete the two sentences: 'The developer will have to prove ... proposals will have to be exceptionally attractive' relating to financial contributions as these are contrary to Circular 05/2005 'Planning Obligations'.

In addition, a number of wording changes have been made to, for example, to:

- Reword the section on the East Midlands Housing Market Study;
- Clarify that the site size thresholds set in Government guidance will apply, rather than be revised, where appropriate;
- Clarify references to the Charnwood Borough Council's Housing Register;
- Add email details to the contacts section.

A summary of all representations has been prepared and considered by Cabinet on 1st September 2005 before finalising the SPD for adoption. Details are set out in Appendix I.

The 'Statement of Consultation' (Charnwood Borough Council, May 2005) published alongside the Draft Affordable Housing SPD sets out the details of initial consultation undertaken with key stakeholders and other bodies prior to formal public consultation.

Appendix I – Cabinet Report and Minute

CABINET 1st September 2005

Report of the Director of Development

ITEM : CHARNWOOD LOCAL DEVELOPMENT FRAMEWORK – AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT – RESPONSE TO CONSULTATION

Purpose of the Report

To consider the responses in respect of the consultation for the Draft Affordable Housing Supplementary Planning Document (SPD) and to seek approval for the adoption of the Affordable Housing Supplementary Document with the recommended changes.

Recommendation(s)

1. That consideration is given to the representations made on the consultation draft SPD and the amendments identified by the Director of Development as detailed at Appendix 1;
2. That the Affordable Housing SPD, incorporating the amendments identified at Appendix 2 and any further amendments now agreed, be adopted on 23rd September 2005 and made available as directed by regulation 19 of the Town & Country Planning (Local Development) (England) 2004.

Reason(s)

1. To review the proposed SPD following full consultation on the draft document to comply with regulation 18 of the Town & Country Planning (Local Development) (England) Regulations;
2. To meet the requirements of Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2004.

Policy Context

Planning Policy Guidance Note 3 'Housing' stresses that the Government believes that it is important to help create mixed and inclusive communities, which offer a choice of housing and lifestyle. It does not accept that different types of housing and tenures make bad neighbours. It states that Local Plan policies should seek affordable housing provision on suitable housing sites, where there is a demonstrated need for such provision.

Key policies relating to affordable housing are set out in Regional Planning Guidance for the East Midland (RPG8) and the Leicestershire, Leicester and Rutland Structure Plan as well as the Borough of Charnwood Local Plan. The Affordable Housing SPD will expand upon Housing Policy H/4, H/5 and H/6 of the adopted Borough of Charnwood Local Plan.

The Affordable Housing SPD will support the achievement of the Council's Priority and particularly the 'sustainable environment' and 'decent homes and neighbourhoods' aims as set out in 'Leading in Leicestershire – Corporate Plan to 2011/12'. Specifically, the SPD is a key contribution towards meeting the desired outcome – 'The supply of affordable housing is increased' and the milestone/targets relevant to that desired outcome as set out in the Corporate Plan's Medium Term Improvement Plan to 2007/8.

Background

In line with the requirements for the preparation of SPDs set out in the Planning and Compulsory Purchase Act 2004, initial consultation was undertaken prior to publication of the formal consultation draft Affordable Housing SPD. This included public consultation on the Issues Paper 'Towards a Charnwood Local Development Framework' undertaken in May 2004, discussions with the Council's 'Preferred Partner' Registered Social Landlords in December 2004 and a Charnwood Strategic Partnership Forum Event was held in February 2005 to discuss housing issues to help shape the future direction of the Council's Housing Strategy.

The views from these events were taken into account in the preparing the Draft Affordable Housing SPD which was approved for consultation by Cabinet on 31st March 2005. Public consultation took place over a 6 week period during May and June 2005. The consultation draft was accompanied by a sustainability appraisal and a statement of consultation in accordance with the requirements of the Act.

The comments received are summarised at Appendix A along with recommended amendments where appropriate. The revised SPD incorporating these changes is included at Appendix B.

Comments Received and Recommended Amendments

19 responses have been received on the SPD. The responses include comments from the Housing Corporation, House Builders Federation, CPRE, Action for a Better Charnwood, several developer interests, 2 Parish Councils and the Government Office for the East Midlands.

The key issues raised by the Government Office for the East Midlands (GOEM) were in relation to:

- The reduction of the site size threshold for rural settlements of less than 3000 population to 5 dwellings is contrary to the adopted Local Plan Policy;
- The need to recognise that the definition of affordable housing includes low cost market housing and subsidised housing as well as social rented housing, and therefore, that different management arrangements will be appropriate in terms of seeking long term affordability;
- Circular 05/2005 Planning Obligations' indicates that planning conditions are preferable to planning obligations.

Other key issues raised include:

- Concerns that the SPD is inconsistent with the Local Plan as well as national policy;
- the robustness and transparency of the Housing Needs Survey 2003 has been questioned, in terms of calculation of a minimum 30% target and the Council's preference for affordable units to be provided as social rented housing;
- There is not sufficient reference to the issues of site economics, viability and the consideration of other planning objectives being taken into consideration.
- The requirement to adhere to Housing Corporation standards in terms of design is not justifiable;
- Seeking 'additional benefits' from financial contributions is contrary to Circular 05/2005 Planning Obligations'.

The responses to the consultation on the draft Affordable Housing SPD have been considered jointly with the Housing and Health Directorate. Appendix 2 sets out the revised Affordable Housing SPD including the following recommended amendments:

- a) To number sections and paragraphs to enable ease of reference to the document;
- b) To update the references to the Housing Needs Survey Update and Housing Market Assessment. Appendix 2, the full summary of the Housing Needs Survey, will also be deleted;
- c) To delete reference to Section 54(a) of the 1990 Act as it is now superseded by Section 38(6) of the Planning and Compulsory Purchase Act 2004;
- d) To take into account the recently published Circular 05/2005 'Planning Obligations' which supersedes Circular 1/97;
- e) To clarify that the Council will take into account costs affecting site viability to bring the SPD in line with Circular 6/98 'Planning and Affordable Housing';
- f) To make reference to guidance on Housing Corporation funding and the fact that non Registered Social Landlords are able to access such funding so that developers are aware of relevant guidelines and funding sources;
- g) To clarify that the site size thresholds set in Government guidance will apply where appropriate;
- h) To delete the section relating to the reduced threshold of 5 dwellings for rural settlements of 3000 population or less as this is contrary to the Local Plan;
- i) To clarify where relevant design standards will apply as Housing Corporation standards can only be required where Housing Corporation funding is given;
- j) To recognise in the policy statement that other management arrangements, as opposed to Registered Social Landlords, will have to be considered for the different types of affordable housing.
- k) To clarify that the use of planning conditions will not be precluded as this would be contrary to Circular 05/2005 'Planning Obligations';
- l) To amend the statement on Section 106 agreements to read: 'The Council will seek to enter into a Section 106 Agreement' as such agreements are entered into voluntarily;
- m) To delete the last sentence relating to off-site provision and to delete the two sentences: 'The developer will have to prove ... proposals will have to be exceptionally attractive' relating to financial contributions as these are contrary to Circular 05/2005 'Planning Obligations'.

One key recommended amendment relates to the site size thresholds for rural settlements of less than 3000 population. Objectors, including the Government Office for the East Midlands, argued that reducing the site size threshold for rural settlements of less than 3000 population to 5 dwellings is contrary to the adopted Local Plan Policy. Although a need for affordable housing has been identified, in such locations, apart from Policy H/6 relating to rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. The Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD can alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. Therefore, the SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.

A number of responses have questioned the robustness and transparency of the Housing Needs Survey 2003 in terms of calculation of a minimum 30% target and the Council's preference for affordable units to be provided as social rented housing. The Housing Needs Survey 2003 is prepared by an experienced consultant in line with the OPDM's research paper 'Local Housing Needs Assessment: A Guide to Good Practice'. The draft Affordable Housing SPD is based upon this assessment. An update of the Housing Needs Survey has recently been completed. This update is supportive of the approach taken by the draft SPD. The draft SPD indicates that the Council will make use of the updated Survey in determining local needs on specific sites.

Consideration has also been given as to whether the recommended amendments will have any impact upon the Sustainability Appraisal undertaken as part of the preparation of the draft SPD. It is considered that the recommended amendments will not significantly alter the sustainability appraisal with the exception of the deletion of the lower thresholds for rural settlements. This is likely to have a detrimental impact in terms of meeting housing needs in rural settlements. However, as stated earlier in the report, it is not appropriate to lower site size thresholds through a Supplementary Planning Document.

Financial Implications

No additional financial implications are expected beyond normal provisions.

Risk Management

Risk Identified	Likelihood	Impact	Risk Management Actions Planned
GOEM decide to direct a change to the SPD	Low	Medium	Further discussions to resolve direction
Application of the SPD may result in planning appeals and potential extra costs	Medium	Medium	Review of the approach through a Local Development Framework Development Plan Document.

Key Decision: Yes
 Background Papers: Charnwood Borough Council (2004) 'Borough of Charnwood Local Plan'
 David Couttie Associates (2003) 'Housing Needs Survey'
 David Couttie Associates (2005) 'Housing Needs Survey Update'

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AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT- SUMMARY OF RESPONSES

Respondent	Summary of Representation	Response of Director of Development
<u>General</u>		
RN002/I Housing Corporation	Welcome production of SPD on affordable housing.	Noted.
RNI 65/I House Builders Federation	<p>Should not introduce a blanket % requirement for affordable housing provision. Circular 6/98 makes it clear that affordable housing cannot be required as a matter of course for all sites. Provision should be negotiated and depend upon identified housing needs and site specific considerations.</p> <p>The response sets out key points from a number of documents:</p> <ul style="list-style-type: none"> • Two letters relating to the use of SPG in terms of affordable housing from Government Offices for the East of England and the South East which cover the scope of SPG and local plan policies, determination of thresholds through the local plan, definition of affordable housing, use of partners developers must use, use of conditions and planning obligations in terms of tenure, rent/purchase price or ownership. • Draft PPG3 Housing ‘Influencing the size, type and affordability of housing’ making reference to use of existing stock for affordable housing, definition of affordable housing by tenure, assessment of affordable housing needs and targets for affordable housing, and viability of development and planning to meet the housing requirements of the whole community reflecting up to date assessments. • ODPM Consultation Paper ‘Planning for Mixed Communities’ (Jan 2005) making reference to the understanding of prevailing housing market conditions, 	<p>The SPD sets out the Council’s policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. It will ensure a consistent approach for each individual proposal for housing development where the negotiations for affordable housing will take place on a site by site basis.</p> <p>The SPD builds upon policies H/4, H/5 and H/6 of the adopted Local Plan and subject to changes set out in this document it is considered that it will be consistent with existing national, regional and local policy.</p> <p>The Council recognises that the economic viability of a site is a relevant issue. However, it considers that it is the responsibility of the applicant to demonstrate through a full financial appraisal that a site will not be viable for development if it is required to fully adhere to the policies set out in the draft SPD. It also recognises that there may be instances where the provision of affordable housing would prejudice the realisation of other planning objectives. To clarify, the SPD will be amended to make reference to costs affecting viability.</p> <p>The Council considers that the lack of availability of public funding is not a reason for not providing affordable housing. However, it is considered that reference is made to guidance on Housing Corporation funding. The SPD will be amended to make reference to guidance on Housing Corporation funding and the fact that non</p>

Respondent	Summary of Representation	Response of Director of Development
	<p>mix of different household types to create mixed communities, what should be contained in policies on affordable housing taking account of the likely development potential of sites, planning obligations.</p> <p>Move from SPG to SPD has not altered the requirement for SPDs to be in full and proper conformity to the adopted statutory documents to which they relate.</p> <p>New Government guidance reinforces the role of Local Plans (as opposed to Supplementary Planning Guidance) in the delivery of affordable housing but it also places more weight and responsibility on the issue of viability.</p> <p>Draft SPD fails to make proper reference to the availability of public funding. The above mentioned consultation paper makes reference to the use of a cascade or fallback mechanism where public funding is lacking.</p>	<p>Registered Social Landlords are able to access such funding.</p>
RN190/1 CPRE - Charnwood	Number sections/paragraphs to enable easy identification. This is relevant to all consultation documents.	The SPD will be amended to number sections and paragraphs where appropriate.
RN190/2 CPRE - Charnwood	Fully support document. Takes full account of the DCA housing needs assessment.	Noted.
RN198/1 Action for a Better Charnwood	Generally support the approach and are pleased greater emphasis is being given to securing a higher proportion of affordable housing. Would like to see the document strengthened and set out more rigorous requirements on developers to meet the affordable housing requirements of the Borough directly.	Noted. The Council must be consistent with national, regional and local development plan policies.
RN198/2 Action for a Better Charnwood	Number paragraphs for easier identification of sections.	The SPD will be amended to number sections and paragraphs where appropriate.
RN234/1 Highways Agency	<p>The following issues should be considered when allocating sites for residential development, writing development briefs or processing planning applications:</p> <ul style="list-style-type: none"> • Impact on surrounding trunk road network and need for mitigation measures – whilst trip rates for 	Noted.

Respondent	Summary of Representation	Response of Director of Development
	<p>affordable housing per dwelling are slightly lower than those for private housing, the density is usually higher for affordable housing and as a result the impact per hectare is greater than for private residential developments</p> <ul style="list-style-type: none"> • Walking, cycling and public transport – it is perceived that occupants will be more likely to use alternatives modes of transport 	
RN326/1 Porter	<p>Firmer policy on affordable housing required but must look to the past to see why there is a lack of affordable housing – loss of council housing through right to buy, buy to let student accommodation, particularly cheaper terraces and developers building smallish 1/2/3 bed accommodation that is overpriced.</p> <p>Council tenants wanting to buy a property should be given back the rent they have paid and possibly more if the property is in good condition, so that they can buy a property on the private market and the Council property is still available for the Council for renting.</p> <p>Families who cannot cope should be socially guided by a sponsor. Problem families who fail to integrate into the normal social structure should be removed for the sake of not blighting the lives of those living normally around them. Moving problem families into one place will mean it is easier to bring resources to help them.</p>	<p>Noted. The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. The approach must be consistent with national, regional and local development plan policies.</p> <p>The points raised in relation to tenants buying Council properties and the removal of problem families are not measures that can be dealt with through this Supplementary Planning Document or planning policy.</p>
RN326/2 Porter	<p>A letter from the Office of the Deputy Prime Minister on how Council should use additional Council Tax from second homes indicates that this is a decision for the Council. It may use such monies for specific purposes such as the provision of affordable housing.</p>	<p>Noted. The points raised in relation to the use of Council tax for affordable housing is not a measure that can be dealt with through this Supplementary Planning Document.</p>
RN361/6 GVA Grimley (Jelson Ltd)	<p>Contrary to Circular 6/98, the SPD does not include advice on securing affordable housing through conversions and or the re use of vacant properties.</p>	<p>The SPD does not explicitly make reference to the provision of affordable housing through conversions or the re-use of vacant properties. Where a qualifying site comes forward it will be subject to the policies of the</p>

Respondent	Summary of Representation	Response of Director of Development
		SPD. The Local Plan does not have a relevant policy upon which to expand for non-qualifying sites. However, the Council will take the opportunity to make provision for affordable housing through conversions or the re-use of vacant properties.
RN370/I CCLATA	Support SPD.	Support noted.
RN375/I Government Office for the East Midlands	Section 38(6) of the Planning and Compulsory Purchase Act has now replaced Section 54(a) of the 1990 Act. Circular 1/97 is under review, a draft revised circular on Planning Obligations was published for consultation in November 2004.	Noted. The SPD will be amended delete reference to Section 54(a) of the 1990 Act. It is noted that the ODPM has published Circular 05/2005 'Planning Obligations' to replace Circular 1/97. The SPD will, where appropriate, take into account the new Circular 05/2005 'Planning Obligations'.
RN377/I Leicester City Council	The draft SPD provides comprehensive and clear guidance on affordable housing policy, definition, local needs and the process for negotiating provision.	Support noted.
<u>Housing Need and Supply</u>		
RNI 65/2 House Builders Federation	It is premature to consult on draft guidance when a consultant is carrying out a dwelling balance analysis and housing market assessment for the Borough. The findings of this work should be properly considered.	The Housing Needs Survey 2003 was the relevant survey available at the time of preparing the draft SPD. However, the draft SPD indicates that the Council will make use of the updated survey in determining local needs on specific sites.
RN233/I Sileby Parish Council	The SPD does not address housing in the smaller more exclusive villages. Some villages do not want or require any more affordable housing. Sileby is saturated with affordable housing. The document does not address this imbalance.	The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. The approach must be consistent with national, regional and local development plan policies. This includes making provision for affordable housing where a local need is demonstrated through a housing needs survey (which indicated a local need in Sileby). The amount of Council and housing association rented accommodation in Sileby,

Respondent	Summary of Representation	Response of Director of Development
		<p>at 11.1%, is less than the Borough average of 12%. PPS12 sets out the principles for preparing SPDs. It specifies that the SPD is consistent with national, regional and local development plan policies and policies which should be subject to proper independent scrutiny. should not be set out in SPD. The Local Plan policies cover allocated sites and new proposals over 25 dwellings and rural exceptions. PPS12 does not allow the SPD to expand on issues not covered by the Local Plan.</p>
<p>RN361/7 GVA Grimley (Jelson Ltd)</p>	<p>To be robust the SPD must articulate in a transparent way the need for affordable housing. The SPD is underpinned by an out-of-date Housing Needs Survey and contains a summary of this survey which is impossible to interpret, is not obviously consistent with the survey and is contradictory.</p> <p>More detailed information is required on why:</p> <ul style="list-style-type: none"> • More than just the 'backlog' and 'concealed households' determined the baseline need across the Borough • If only 14.5% of households have an income of less than £15,000 (assuming £15,000 will enable them to buy into the housing market), 30% of new dwellings need to be affordable • Households in 'unsuitable' housing form a component of need • Committed affordable housing does not appear to form part of the need calculation. 	<p>The Housing Needs Survey 2003 updates the survey referred to in the Local Plan which is 1995 based. The summary was included to set out the background for the draft SPD. The Housing Needs Survey is prepared in line with the OPDM's research paper 'Local Housing Needs Assessment: A Guide to Good Practice'. This includes the backlog of need (including those in unsuitable housing - who are not Council or RSL tenants or where staying in existing accommodation is the preferred solution) - and concealed households.</p> <p>The survey summary indicates 14.5% of existing households have an income between £10-15,000 and a further 21.5% have an income less than £10,000 (a total of 36%). In terms of concealed households 52% have household incomes below £15,000. These figures are above 30%.</p> <p>In recent years, an average of 100 affordable housing units, from all sources – through Council or Housing Corporation grant or Section 106 agreements - have been built each year. Consideration of existing and potential housing commitments indicate an expected rate of 140 units for 2005/06 and 90 per year for the next 4 years. This calculation assumes a contribution of 30% for affordable housing for newly identified sites. This indicates a significant shortfall from the figure identified in the</p>

Respondent	Summary of Representation	Response of Director of Development
		Housing Needs Survey.
RN378/I P Clarke	Developers should be encouraged to develop bungalows so that the elderly can stay in the own village. Mountsorrel has little choice in terms of bungalows. Previous sites where bungalows were discussed have not taken place.	Housing Policy H/5 'Affordable Housing on Unallocated Sites' indicates that the development incorporates a range and mix of housing. The draft SPD indicates that the mix of affordable housing on any given site will be dependent on local housing need and determined on a site by site basis by the Council at the time of the proposal for housing development. This enables the Council to determine priority housing needs, including homes for single people, family accommodation, older people or those who may have special housing needs, at the time of the proposal. This may determine that there is a demand for bungalows in that particular location. However, bungalows have a high land take which is difficult to reconcile with Government policy to increase density. They also cost more to build. Given this context, it is likely that bungalows will be provided as affordable housing only occasionally.
<u>Target</u>		
RN002/2 Housing Corporation	Note increase to 30% to address needs.	Noted.
RN002/3 Housing Corporation	<p>How will the Borough ensure it has evidence to demonstrate that the cost of abnormals etc are reflected in the land value?</p> <p>See Housing Corporation's 'The National Affordable Housing Programme 2006/2008' which sets out key areas for bids for our funding and explains our approach to and requirements in relation to Section 106 sites.</p> <p>Our funding can now be accessed by non Registered Social Landlords (eg developers). This needs to be reflected in the SPD.</p>	<p>The Council does not need evidence that the cost of abnormals is reflected in the land value. The SPD indicates that land prices should take account of abnormal costs that can be foreseen and gives a number of examples where it is expected that sufficient surveys should be undertaken to identify such abnormal costs. Where exceptional circumstances are claimed in terms of abnormal costs the Council will expect a full financial appraisal of the scheme.</p> <p>Noted. The SPD will make reference to guidance on Housing Corporation funding and the fact that</p>

Respondent	Summary of Representation	Response of Director of Development
		<p>non Registered Social Landlords are able to access such funding.</p>
<p>RNI65/3 House Builders Federation</p>	<p>2003 Housing Needs survey recommends a target of up to 30% provision whilst the SPD seeks a minimum of 30% affordable housing units on all sites. This wording fails to give regard to site economics including viability issues such as other planning gain requirements and whether or not any form of social housing grant is available.</p> <p>The adopted Local Plan policy does not refer to specific percentage requirements.</p>	<p>The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. It gives further details in regard of Local Plan policy. Policy H/4 indicates that the Council will keep under review assessments of need for affordable housing. In terms of the target, a minimum of 30% was chosen because:</p> <ul style="list-style-type: none"> • The full Housing Needs Survey 2003 recommends a level of 30%; • A large proportion of the overall housing requirement up to 2016 is committed and providing affording housing at a percentage considerably lower than the current identified target; • Recent provision of affordable housing, from all sources, is about 100 affordable units per year, also considerably lower than 30% of the overall requirement; • House prices have risen considerably compared to incomes since the survey and so increasing the number of households who are unable to buy or rent a property in the general housing market.
<p>RN/190/3 CPRE - Charnwood</p>	<p>Concerned that target will be seen as a maximum figure for developers. Insert proviso where circumstances and assessments prove a greater percentage can be achieved.</p>	<p>The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. The SPD clearly indicates that the Council will seek a minimum of 30% affordable housing units on qualifying sites.</p>
<p>RNI98/3 Action for a Better Charnwood</p>	<p>Strengthen bold statement by use of words 'will require' rather than 'will seek'.</p>	<p>Circular 6/98 makes it clear that where there is evidence of need for affordable housing Council's can include a policy in a Local Plan for seeking an element of such</p>

Respondent	Summary of Representation	Response of Director of Development
		housing on suitable sites. This provision should be sought through negotiation with applicants. The Council cannot 'require' an applicant to provide such housing.
RN212/I Pegasus Planning Group (David Wilson Estates)	Object to requirement for a minimum of 30% of affordable housing on all new sites. Circular 6/98 does not state what percentages should be sought. Each development proposal should be dealt with individually and affordable housing percentages negotiated on a site by site basis.	The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. It will ensure a consistent approach for each individual proposal for housing development where the negotiations for affordable housing will take place on a site by site basis.
RN311/I British Waterways	<p>Concerned that no reference is made to paragraph 10 (i) bullet 4 of Circular 6/98 which states 'In preparing plan policies for affordable housing, and in assessing the suitability of sites identified in the plan and any sites that may come forward not allocated in the plan, the following criteria should be taken into account:</p> <ul style="list-style-type: none"> • Size and suitability and the economics of provision; • Whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority in the development of the site' <p>The opportunity for exceptional circumstances, subject to a full financial appraisal, is noted but feel the Council should indicate that the realisation of other planning objectives can be considered as exceptional circumstances.</p>	The Council recognises that the economic viability of a site is a relevant issue. However, it considers that it is the responsibility of the applicant to demonstrate through a full financial appraisal that a site will not be viable for development if it is required to fully adhere to the policies set out in the draft SPD. It also recognises that there may be instances where the provision of affordable housing would prejudice the realisation of other planning objectives. To clarify, the SPD will be amended to make reference to costs affecting viability.
RN361/I GVA Grimley (Jelson Ltd)	<p>Serious reservations relating to the quantity of affordable housing to be sought ie. 30% of new dwellings on qualifying sites. The requirement will be applied across the Borough without regard to local circumstances.</p> <p>The Council needs to articulate in a transparent way how the Housing Needs Survey translates into the percentage requirement and why a blanket requirement is appropriate (ie why local differences in the housing market and socio-economic characteristics should be ignored.)</p>	The Housing Needs Survey is prepared in line with the OPDM's research paper 'Local Housing Needs Assessment: A Guide to Good Practice' by an experienced consultant. The Survey recommends a level of 30% should be used to negotiate for affordable housing. The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. It will ensure a consistent approach for each individual proposal

Respondent	Summary of Representation	Response of Director of Development
		for housing development where the negotiations for affordable housing will take place on a site by site basis.
RN371/1 Thrussington Parish Council	Support 30% target for affordable housing. Small rural communities such as Thrussington need affordable housing particularly for young residents who wish to remain in their home village.	Support noted. The concerns relating the small rural settlements are shared. However, in terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. The SPD cannot re-open this issue and come to a different conclusion. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.
RN377/2 Leicester City Council	Note and support increase of affordable housing target to a minimum of 30%.	Support noted.
<u>Thresholds</u>		
RN329/1 William Davis Ltd	The Courts have accepted that adjustments of targets for the affordable housing through supplementary planning guidance rather than a local plan review. However, clear justification must be given. Circular 6/98 indicates that one key determinant in terms of affordable housing ultimately rests upon the rigorous nature of the housing needs assessment. Cast considerable doubt on the Council's updated Housing Needs Survey as the scale of need identified vastly exceeds the	The SPD sets out the Council's policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. It gives further details in regard of Local Plan policy. Policy H/4 indicates that the Council will keep under review assessments of need for affordable housing. In terms of the target, a minimum of 30% was chosen because: <ul style="list-style-type: none"> • The Housing Needs Survey is prepared in line

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	<p>total housing requirements for the Borough (660 dwellings compared to 470 per year). This degree of mismatch is excessive and casts doubt on the robustness of the technical justification made for the change to the negotiable target.</p> <p>Should also consider the potential effects of policy change on the future supply of housing likely to come forward on small brownfield sites ie. total impact of target and threshold changes on viability of certain windfall schemes and hence will effect the delivery of overall housing numbers within the Borough.</p>	<p>with the OPDM's research paper 'Local Housing Needs Assessment: A Guide to Good Practice' by an experienced consultant. The Survey recommends a level of 30% should be used to negotiate for affordable housing.</p> <ul style="list-style-type: none"> • A large proportion of the overall housing requirement up to 2016 is committed and providing affording housing at a percentage considerably lower than the current identified target; • Recent provision of affordable housing, from all sources, is about 100 affordable units per year, also considerably lower than 30% of the overall requirement; • House prices have risen considerably compared to incomes since the survey and so increasing the number of households who are unable to buy or rent a property in the general housing market. <p>The Council recognises that the economic viability of a site is a relevant issue. However, it considers that it is the responsibility of the applicant to demonstrate through a full financial appraisal that a site will not be viable for development if it is required to fully adhere to the policies set out in the draft SPD. It also recognises that there may be instances where the provision of affordable housing would prejudice the realisation of other planning objectives. To clarify, the SPD will be amended to make reference to costs affecting viability.</p>
RNI 65/4 House Builders Federation	<p>No direct linkage to site sizes as specified in the adopted Local Plan.</p> <p>The threshold of 5 dwellings or more is contrary to the Local Plan paragraph 4.106 where it states that a reduction in thresholds to 15 or more dwellings in settlements below 3,000</p>	<p>The Local Plan relies on the thresholds set out in Circular 6/98. Circular 6/98 does not preclude the provision of affordable housing on sites below the threshold and the Government encourages developers to consider such provision where they think it feasible and appropriate.</p>

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	<p>population is considered unjustified. This threshold fails to comply with national and local housing policies.</p> <p>It is unclear how and in what context the Council will seek to encourage provision of affordable housing on sites that fall below these thresholds.</p>	<p>In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.</p>
<p>RN/190/4 CPRE - Charnwood</p>	<p>Suggest 'The Council will seek' is changed to 'the Council will demand'.</p> <p>Welcome statement that target will apply to renewal applications.</p> <p>Reduce minimum site size in line with revised Government guidance – proposed changes to PPG3 such as those published in the consultation paper January 2005 'Planning for Mixed Communities'.</p> <p>Prefer a contribution level for each expected phase, not allocated to a single phase eg. 0.8 ha should have a minimum 30% affordable dwellings. Make this section bold.</p> <p>South Hams District Council's Affordable Housing SPG requires 50% of affordable housing on windfall sites. This is a model of good practice and a sustainable option on previously developed land.</p> <p>Support reduction of threshold to 5 dwellings in rural settlements of less than 3,000 population but there needs to be strict surveillance of this policy through development</p>	<p>The SPD must be consistent with adopted national, regional and local development plan policies.</p> <p>Circular 6/98 makes it clear that where there is evidence of need for affordable housing Council's can include a policy in a Local Plan for seeking an element of such housing on suitable sites. This provision should be sought through negotiation with applicants. The Council cannot 'demand' an applicant to provide such housing.</p> <p>The draft SPD indicates that where there is a reasonable expectation that adjoining land will come forward for housing development (ie. that a site has been sub-divided), the Council will take account of the whole area to calculate any requirements which each phase providing its share. The section on sub-division gives detailed policy guidance on how thresholds will be measured. It is not considered that it is a separate issue requiring a separate emboldened statement.</p> <p>In terms of rural settlements where the population is</p>

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	<p>control. Strengthen this part of the policy by adding a minimum site size as many plots in rural locations are generally proposed for larger dwellings at low density.</p>	<p>3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.</p>
<p>RNI98/4 Action for a Better Charnwood</p>	<p>Strengthen bold statement by use of the words ‘The Council will demand’ rather than ‘the Council will seek’. Adopt revised thresholds proposed by Government.</p> <p>Set targets to ensure that each year the number of new affordable homes exceeds the losses of existing ones (ie through Right to Buy). So a strong line should be taken in seeking to ensure affordable housing on windfall sites. Permission should be refused where developers are not willing to agree to a minimum level of 30%.</p> <p>Agree that renewal of planning permission should be subject to current and future requirements for affordable housing.</p> <p>Take a tough line with efforts to circumvent the threshold requirements (eg by sub-division). Amend final sentence of paragraph to read: ‘Affordable housing will also be required where the Council feels that a development site has been specifically designed so that the number of dwellings falls below the threshold.’</p> <p>Support reduction of threshold to 5 dwellings in rural settlements of 3,000 population.</p>	<p>The SPD sets out the Council’s policy for seeking the provision of affordable housing in new development proposals through negotiation with applicants. The SPD must be consistent with adopted national, regional and local development plan policies.</p> <p>The 30% target for the provision of affordable housing relates to housing need rather than the replacement of losses of Council housing.</p> <p>Circular 6/98 makes it clear that where there is evidence of need for affordable housing Council’s can include a policy in a Local Plan for seeking an element of such housing on suitable sites. This provision should be sought through negotiation with applicants. The Council cannot ‘demand’ an applicant to provide such housing.</p> <p>In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1</p>

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	<p>Make paragraphs starting 'On sites where there is no specific Local Plan allocation' and ending 'specifically designed so that the number of dwellings falls below the threshold' bold to give greater emphasis.</p>	<p>hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.</p> <p>The draft SPD indicates that where there is a reasonable expectation that adjoining land will come forward for housing development (ie. that a site has been sub-divided), the Council will take account of the whole area to calculate any requirements which each phase providing its share. The Council can seek to negotiate, not require, affordable housing.</p> <p>The sections on local plan allocations and sub-division gives detailed policy guidance on how thresholds will be measured. It is not considered that these are separate issues requiring a separate emboldened statement.</p>
<p>RN212/2 Pegasus Planning Group (David Wilson Estates)</p>	<p>The SPG states that it will apply to renewal of permissions and that the cost of meeting affordable housing requirements will be reflected in land prices. Some sites will have been purchased prior to the introduction of the SPG and so a requirement to provide a minimum of 30% of affordable housing where a renewal of permission is made may result in the development not being viable due to the higher price paid for the land. The SPG should therefore only apply to land purchased since the publication of the SPG.</p>	<p>Planning applications will be subject to the adopted national, regional and local planning policy relevant at the time of the application.</p>
<p>RN329/2 William Davis Ltd</p>	<p>Setting site thresholds in line with Government guidance might not be as straightforward as implied. Circular 6/98 allows the lowering of thresholds via the local plan process. Whilst lower</p>	<p>Circular 6/98 is clear in terms of setting site size thresholds. The guidance set out in the consultation draft 'Planning for Mixed Communities' indicates the minimum</p>

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	<p>thresholds have been mooted in Government consultation papers it is not known whether any local justification is required. So reference to thresholds being applied in line with such guidance would be of no assistance to future decision making.</p> <p>Reduction of the threshold to 5 dwellings in rural settlements less than 3000 population is contrary to Circular 6/98 in terms of the need to take new thresholds through the local plan process. The Council also considered the adoption of lower thresholds for settlements of less than 3000 population but rejected this approach. The Council fails to give sound reasons for this change which has only recently been tested at public inquiry.</p>	<p>site-size threshold above which affordable housing is to be sought should not normally be above 15 dwellings or sites of more than 0.5 hectares. However, a local planning authority can adopt different thresholds by giving justification. It is not considered necessary to amend the statement on thresholds in this respect. However, the SPD will be amended to indicate that thresholds set in Government guidance will apply.</p> <p>In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.</p>
RN361/5 GVA Grimley (Jelson Ltd)	It is queried why the rural sites threshold should be set at a level which will almost certainly threaten viability and prevent developers from bringing sites forward.	In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD

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		cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.
RN371/2 Thrussington Parish Council	Housing development in villages such as Thrussington are small scale and unless the site size threshold is low enough will be taken up by larger 'executive' style homes favoured by developers. Adopt a threshold level of 5 houses or 1 hectare as the minimum size for any individual development to be subject to the affordable housing requirement.	In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.
RN375/2 Government Office for the East Midlands	PPS12 sets out the principles for preparing SPDs. It specifies that the SPD is consistent with national, regional and local development plan policies and policies which should be subject to proper independent scrutiny should not be set out in SPD. The reference to a lower threshold for smaller settlements is contradictory to the explanatory text (paragraph 4.106) of the Local Plan which indicates that the exceptions policy is considered to be the appropriate mechanism to secure affordable housing.	In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a

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		Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.
RN376/1 Fairclough Homes	<p>Concerned about reduction of threshold to 5 dwellings in areas of 3000 population or less. This is well below the current thresholds in Circular 6/98 although these are likely to be lowered. Clearer justification is required for setting a level as low as 5. In many cases, particularly in respect of brownfield sites (where there are problems of contamination and land assembly), could detrimentally affect the viability of a scheme. Both Circular 6/98 and 'Planning for Mixed Communities' recognise the need to take account of the economics of housing provision and the development potential of individual sites.</p> <p>At the very least the SPD needs to allow for flexibility where there is evidence that the viability of a site is threatened by a requirement for affordable housing.</p> <p>The SPD states that if all current allocations include their full quota of provision, there would still be a shortfall of affordable housing but this does not appear to take account the contribution of windfalls and the need to continue to monitor provision towards meeting affordable housing targets.</p>	<p>In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.</p> <p>The Council recognises that the economic viability of a site is a relevant issue. However, it considers that it is the responsibility of the applicant to demonstrate through a full financial appraisal that a site will not be viable for development if it is required to fully adhere to the policies set out in the draft SPD. It also recognises that there may be instances where the provision of affordable housing would prejudice the realisation of other planning objectives. To clarify, the SPD will be amended to make reference to costs affecting viability.</p> <p>In recent years, an average of 100 affordable housing units, from all sources – through Council or Housing Corporation grant or Section 106 agreements - have been built each year. Consideration of existing and potential</p>

Respondent	Summary of Representation	Response of Director of Development
		<p>housing commitments indicate an expected rate of 140 units for 2005/06 and 90 per year for the next 4 years. This calculation assumes a contribution of 30% for affordable housing for newly identified sites. This indicates a significant shortfall from the figure identified in the housing needs survey.</p>
<p>RN380/I Alpha Homes Ltd</p>	<p>Concerned about reduction in threshold levels from that set out in Circular 6/98. It is premature to use lower thresholds before the formal issue of the new PPS3 'Planning for housing' which is being published for consultation in Autumn 2005. The threshold issue should not be picked out in isolation in advance of the wider review taking place.</p>	<p>Circular 6/98 is clear in terms of setting site size thresholds. The guidance set out in the consultation draft 'Planning for Mixed Communities' indicates the minimum site-size threshold above which affordable housing is to be sought should not normally be above 15 dwellings or sites of more than 0.5 hectares. However, a local planning authority can adopt different thresholds by giving justification. It is not considered necessary to amend the statement on thresholds in this respect. However, the SPD will be amended to indicate that thresholds set in Government guidance will apply.</p> <p>In terms of rural settlements where the population is 3000 or less, a need for affordable housing has been identified but, apart from rural exceptions, there is no mechanism in the adopted Local Plan to secure additional affordable housing on sites less than 25 dwellings or 1 hectare. However, it is recognised that the Local Plan considered the issue of lowering thresholds in rural settlements of 3000 or less population and concluded that the exceptions policy was the appropriate mechanism to secure affordable housing. It is accepted that the SPD cannot alter the thresholds in respect of rural settlements. This issue will have to be considered through a Development Plan Document that is subject to independent examination. The SPD will be amended to delete the section relating to thresholds for rural settlements of 3000 population or less.</p>

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<u>Tenure</u>		
RN002/4 Housing Corporation	ODPM issued a consultation paper in June on new 'Low Cost Housing Products' which may be available through the Housing Corporation's programme for 2006/2008.	Noted.
RNI65/5 House Builders Federation	<p>The SPD seeks to dictate particular percentages of affordable housing tenures (75% social rented). The definition of appropriate affordable housing provision is too specific and contrary to Circular 6/98.</p> <p>In context of the lifetime of the Plan, not all affordable housing provision has to be directly subsidised or managed for rent by a registered social landlord. Nor does it need to be held in perpetuity.</p>	<p>The Housing Needs Survey indicates that 52% of concealed households had an annual income of £15,000 or less and that a further 17% had an annual income of between £15,001 and £23,000. A total of 69% of concealed households therefore have incomes of £23,000 or less. In February 2003 the price of a 2 bed 'access' terraced house ranged from £70,000 in Loughborough to £86,950 in the settlements fringing Leicester.</p> <p>It is also calculated that a household income of £23,000 may just about give access to a shared ownership property priced at £80,000. Newly built shared ownership properties provided through Section 106 Agreements tend to be valued more highly than existing properties. Therefore it is difficult to gain access to such properties at this cost and many are unsuitable in terms of size and location to the concealed households who want to access them. Since the survey house prices have risen more quickly than incomes and so the level of need is likely to be higher. The needs of the existing households, for example in unsuitable housing, also have to be taken into account.</p> <p>In short, shared ownership is not in practice affordable for a large proportion of households in housing need in Charnwood. It is considered therefore that the preference for 75% social rented housing is justifiable.</p>
RN329/3 William Davis Ltd	Should not place too great a priority on social rented housing. Limited funding will increase the extent of the subsidy required from the landowner for future schemes which will be heightened where a proportion of social rented units are required. This could affect the viability of certain schemes or	The Housing Needs Survey indicates that 52% of concealed households had an annual income of £15,000 or less and that a further 17% had an annual income of between £15,001 and £23,000. A total of 69% of concealed households therefore have incomes of £23,000

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	<p>cause the landowner not to release land for housing.</p> <p>The Council must be flexible in this new funding climate in terms of the mix of tenure to be sought. A greater mix of shared ownership units will assist cross subsidy, so assist scheme viability, and will also be meeting an important element of affordable housing need. Shared equity units can also meet affordable housing needs - this company has not observed reluctance from mortgage lenders to grant mortgages to prospective occupiers.</p>	<p>or less. In February 2003 the price of a 2 bed 'access' terraced house ranged from £70,000 in Loughborough to £86,950 in the settlements fringing Leicester.</p> <p>It is also calculated that a household income of £23,000 may just about give access to a shared ownership property priced at £80,000. Newly built shared ownership properties provided through Section 106 Agreements tend to be valued more highly than existing properties. Therefore it is difficult to gain access to such properties at this cost and many are unsuitable in terms of size and location to the concealed households who want to access them. Since the survey house prices have risen more quickly than incomes and so the level of need is likely to be higher. The needs of the existing households, for example in unsuitable housing, also have to be taken into account.</p> <p>In short, shared ownership is not in practice affordable for a large proportion of households in housing need in Charnwood. It is considered therefore that the preference for 75% social rented housing is justifiable.</p>
<p>RN361/2 GVA Grimley (Jelson Ltd)</p>	<p>Serious reservations relating to the Council's tenure preferences. More detailed information is required on why the Council prefers the provision of social rented housing:</p> <ul style="list-style-type: none"> • householders (as evidenced by the Housing Needs Survey) prefer the opportunity to owner occupy so suggesting a need for more low cost housing. • Circular 6/98 states that subsidised and low cost housing should be provided. 	<p>The Housing Needs Survey indicates that 52% of concealed households had an annual income of £15,000 or less and that a further 17% had an annual income of between £15,001 and £23,000. A total of 69% of concealed households therefore have incomes of £23,000 or less. In February 2003 the price of a 2 bed 'access' terraced house ranged from £70,000 in Loughborough to £86,950 in the settlements fringing Leicester.</p> <p>It is also calculated that a household income of £23,000 may just about give access to a shared ownership property priced at £80,000. Newly built shared ownership properties provided through Section 106 Agreements tend to be valued more highly than existing properties. Therefore it is difficult to gain access to such properties at</p>

Respondent	Summary of Representation	Response of Director of Development
		<p>this cost and many are unsuitable in terms of size and location to the concealed households who want to access them. Since the survey house prices have risen more quickly than incomes and so the level of need is likely to be higher. The needs of the existing households, for example in unsuitable housing, also have to be taken into account.</p> <p>In short, shared ownership is not in practice affordable for a large proportion of households in housing need in Charnwood. It is considered therefore that the preference for 75% social rented housing is justifiable.</p> <p>The survey does indicate that concealed households express a preference for owner occupation but the report is clear that (in 2003) around 60% of new households have incomes inadequate to be able to purchase. The sustained period of high house price inflation has impacted on new forming households ability to buy. This problem will have increased since the survey due to the fact the household incomes have not risen as fast as house prices.</p>
RN380/2 Alpha Homes Ltd	<p>The requirement for 75% social rented housing is too onerous. Circular 6/98 recognises that affordable housing can be social rent, shared ownership and low cost market housing. Whilst a statement setting out the Council's priority tenure is accepted, this should be the basis for negotiation and other types of affordable housing including key worker housing should be recognised.</p>	<p>The Housing Needs Survey indicates that 52% of concealed households had an annual income of £15,000 or less and that a further 17% had an annual income of between £15,001 and £23,000. A total of 69% of concealed households therefore have incomes of £23,000 or less. In February 2003 the price of a 2 bed 'access' terraced house ranged from £70,000 in Loughborough to £86,950 in the settlements fringing Leicester.</p> <p>It is also calculated that a household income of £23,000 may just about give access to a shared ownership property priced at £80,000. Newly built shared ownership properties provided through Section 106 Agreements tend to be valued more highly than existing properties. Therefore it is difficult to gain access to such properties at this cost and many are unsuitable in terms of size and</p>

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		<p>location to the concealed households who want to access them. Since the survey house prices have risen more quickly than incomes and so the level of need is likely to be higher. The needs of the existing households, for example in unsuitable housing, also have to be taken into account.</p> <p>In short, shared ownership is not in practice affordable for a large proportion of households in housing need in Charnwood. It is considered therefore that the preference for 75% social rented housing is justifiable.</p>
<u>Housing Mix</u>		
RNI65/6 House Builders Federation	The status of a Brief, for each site setting out the affordable housing to be sought in each location, is unclear.	The Brief will not be a Supplementary Planning Document but a site specific assessment produced when it is known that a housing proposal is being made. It will indicate the mix of affordable housing – the size and type of dwellings – that the Council seeks from a particular location.
RN/190/5 CPRE - Charnwood	<p>Reasons for variance in the size and type of affordable housing on individual sites should be clearly stated. Make clear that variations in local conditions will not be allowed where the minimum target of 30% is not achieved.</p> <p>Support preparation of briefs for each site setting out the affordable housing requirements for individual locations.</p>	The SPD recognises that the characteristics of the housing market in different parts of Charnwood are not uniform and will also change over time. A uniform quota in terms of the housing mix – size and type of dwellings - is therefore not set out in the SPD. The draft SPD indicates that the mix of affordable housing on any given site will be dependent on local housing need and determined on a site by site basis by the Council at the time of the proposal for housing development. This enables the Council to determine priority housing needs, including homes for single people, family accommodation, older people or those who may have special housing needs, at the time of the proposal.
RNI98/4 Action for a Better Charnwood	Accept need for flexibility in terms of housing size and type in different locations but reasons for departure from the general levels and patterns of affordable housing should be	The SPD recognises that the characteristics of the housing market in different parts of Charnwood are not uniform and will also change over time. A uniform quota in terms

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	<p>transparently and clearly stated. This paragraph should make it clear that variations in local conditions will not be allowed if they would result in a failure to meet the threshold requirements.</p> <p>Support preparation of briefs for each site setting out the affordable housing requirements for particular locations.</p>	<p>of the housing mix – size and type of dwellings - is therefore not set out in the SPD. The draft SPD indicates that the mix of affordable housing on any given site will be dependent on local housing need and determined on a site by site basis by the Council at the time of the proposal for housing development. This enables the Council to determine priority housing needs, including homes for single people, family accommodation, older people or those who may have special housing needs, at the time of the proposal.</p>
<u>Design and layout</u>		
RN002/5 Housing Corporation	<p>Require Housing Corporation standards (eg SDS) or whatever is applicable at the time. Do not encourage deviation from these where our funding is required as waivers are only issued on an exceptional basis.</p> <p>As funding can now be accessed by non RSLs, Housing Corporation standards will be relevant and so reference to RSL design briefs should be reconsidered.</p> <p>Housing Corporation funding for 2006/2008 requires EcoHomes standard of 'very good', although this may change in future years.</p>	<p>The Council will expect a high standard of design for affordable housing as it expects for market housing. The Council has approved for adoption the Supplementary Planning Document 'Leading in Design' which sets out guidance to encourage, promote and inspire higher design standards for development. This is in line with key principles in PPS1 to pursue sustainable development, climate change, high quality design and creating sustainable and safe communities. The most recent Government statement, the Consultation Paper 'Planning for Housing Provision' (July 2005) states that 'The aim is that the planning system is used to its maximum effect to ensure the delivery of new homes that are well designed, make the best use of land, are energy efficient, make the most use of new building technologies and help to deliver sustainable development'.</p> <p>It is recognised that Housing Corporation standards cannot be required for non-funded schemes. The SPD will be amended to clarify where relevant standards will also apply.</p>
RN165/7 House Builders	Unreasonable to seek automatic compliance with Housing Corporation standards (or those of other organisations)	It is recognised that Housing Corporation standards cannot be required for non-funded schemes. The SPD

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Federation	where they are not directly funding or will not be responsible for managing the properties.	will be amended to clarify where relevant standards will also apply.
RN198/4 Action for a Better Charnwood	Strongly support view that for all developments affordable housing is mixed in with and is indistinguishable from other housing units.	Support noted.
RN329/4 William Davis Ltd	<p>Support objective of seeking to ensure affordable housing is well related and indistinguishable from market housing. However, consider greater emphasis on integration through design and layout will be more effective in creating successful mixed communities than artificial pepper potting of affordable housing through development schemes. Our experience indicates that clusters of no less than 15 units are necessary to prevent management difficulties for Registered Social Landlords.</p> <p>No justification for affordable housing to be built to the Housing Association's 'Scheme Development Standards, RSL design briefs or BRE EcoHomes standards if no Housing Corporation funding is given. Such requirements would make the affordable units distinguishable from market housing.</p>	<p>The Council considers that pepper potting is the spreading of single affordable units across a site. The Council is expecting the distribution of small groups of affordable housing units across a site. It considers that groups of 15 are too large. The Council's preferred partner Registered Social Landlords have accepted small groups of 3 or 4 units in the recent past.</p> <p>The Council will expect a high standard of design for affordable housing as it expects for market housing. The Council has approved for adoption the Supplementary Planning Document 'Leading in Design' which sets out guidance to encourage, promote and inspire higher design standards for development. This is in line with key principles in PPS1 to pursue sustainable development, climate change, high quality design and creating sustainable and safe communities. The most recent Government statement, the Consultation Paper 'Planning for Housing Provision' (July 2005) states that 'The aim is that the planning system is used to its maximum effect to ensure the delivery of new homes that are well designed, make the best use of land, are energy efficient, make the most use of new building technologies and help to deliver sustainable development'.</p> <p>It is recognised that Housing Corporation standards cannot be required for non-funded schemes. The SPD will be amended to clarify where relevant standards will also apply.</p>
RN379/1 Gordon	Understand and recognise the need for affordable housing but in many cases it can have a depressing effect on land and	The Government believes it is important to help create mixed and inclusive communities offering a choice of

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Smith Associates	<p>residential property values adjacent to the site.</p> <p>Thresholds and percentages should not be applied uniformly on every site – there must be exceptions. Some sites may well be able to take more than others.</p> <p>Great care should be taken to avoid the detracting of the character of the locality – particularly conservation areas.</p> <p>Consider the likely effect of providing affordable housing on the character of one locality as opposed to another in endeavouring to meet the required number.</p> <p>Perhaps there should be more off-site provision.</p>	<p>housing and lifestyle. It does not accept that different types of housing make bad neighbours.</p> <p>The Council will expect a high standard of design for affordable housing as it expects for market housing. The Council has approved for adoption the Supplementary Planning Document ‘Leading in Design’ which sets out guidance to encourage, promote and inspire higher design standards for development.</p>
<p><u>Management and Long term affordability</u></p>		
RNI 65/8 House Builders Federation	<p>In context of the lifetime of the Plan, not all affordable housing provision has to be directly subsidised or managed for rent by a registered social landlord. Nor does it need to be held in perpetuity.</p> <p>Council has no legal powers to dictate who can own or manage affordable housing provision. So the text relating to nominated Registered Social Landlords is not appropriate.</p>	<p>The Council’s considers that the involvement of Registered Social Landlords will ensure that the property remains affordable and is occupied by local people in housing need in the long term. However, it is recognised that there are other management arrangements will have to be considered for the different types of affordable housing. The SPD will be amended to recognise that there are other management arrangements will have to be considered for the different types of affordable housing.</p> <p>The Council does not seek to dictate who can own or manage affordable housing but set out its preferences and indicate that it has a number of Registered Social Landlords who it prefers to work with and that there are advantages to this approach for the developer.</p>
RN361/3 GVA Grimley (Jelson Ltd)	<p>Serious reservations relating to the (strong) preference for registered social landlord ownership and management. Other arrangements are perfectly capable of delivering affordable housing at the right time, in the right place and in the right</p>	<p>The Council’s considers that the involvement of Registered Social Landlords will ensure that the property remains affordable and is occupied by local people in housing need in the long term. However, it is recognised</p>

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	form.	that there are other management arrangements will have to be considered for the different types of affordable housing. The SPD will be amended to recognise that there are other management arrangements will have to be considered for the different types of affordable housing.
RN375/3 Government Office for the East Midlands	The Council's preference for social rented housing is acknowledged but the definition of affordable housing in Circular 6/98 and the Local Plan includes low cost market and subsidised housing, irrespective of tenure. First paragraph on page 12 should recognise that different management arrangements will be required for different types of affordable housing in seeking to achieve long term affordability.	The Council's considers that the involvement of Registered Social Landlords will ensure that the property remains affordable and is occupied by local people in housing need in the long term. However, it is recognised that there are other management arrangements will have to be considered for the different types of affordable housing. The SPD will be amended to recognise that there are other management arrangements will have to be considered for the different types of affordable housing.
<u>Delivery of Affordable Housing</u>		
<u>Use of Section 106 Agreements</u>		
RN212/3 Pegasus Planning Group (David Wilson Estates)	It is considered unreasonable to require the provision of affordable housing 'at least as quickly as the remainder of the development' as some developments need the revenue from the sale of the market housing in order to fund the affordable housing. The delivery of affordable housing should be decided on a site by site basis.	This is a matter for development of Heads of Terms and standard clauses. However, the intention is to prevent the provision of the affordable housing units at the end of the development. Currently, the Council negotiates a staged approach whereby a proportion of the affordable housing must be provided along with the first proportion of market housing etc.
RN326/1 I Porter	Should not put faith in Section 106 agreements as they are piecrust promises that planning uses like confetti knowing full well they will not be adhered to.	Circular 6/98 indicates that both conditions and planning obligations (including Section 106 Agreements) may be legitimately used, where justified, to achieve the development and use of land in a way which ensures that

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		some of the housing built is occupied, either initially or in perpetuity, by only people falling into particular categories of need for affordable housing.
RN329/5 William Davis Ltd	The Council should have included suggested Heads of Terms and standard clauses for Section 106 Agreements in this consultation. To give stakeholders the opportunity to comment on the detail of clauses that may have significant implications for scheme delivery. Should avoid further detailed reconsideration of these clauses during individual negotiations.	The Council will prepare Heads of Terms and standard clauses for Section 106 Agreements and carry out a separate consultation. It is not intended that the Heads of Terms and standard clauses form part of the SPD.
RN375/4 Government Office for the East Midlands	The first paragraph is contrary to Circular 6/98 (Paragraph B20) which indicates a choice between imposing conditions and entering into a planning obligation, the former is preferable. The Council's preference for Section 106 agreements is noted but it should not preclude the use of appropriate conditions. Also, as Section 106 agreements are entered into voluntarily, amend to 'The Council will seek to enter into a Section 106 Agreement'.	This comment appears to relate to paragraph B20 of Circular 1/97. However, the principle of this comment applies through paragraph B51 of the new Circular 05/2005 'Planning Obligations'. Although the Council's preference for Section 106 Agreements remains, the SPD will be amended to clarify that the use of planning conditions will not be precluded. Also, it is agreed that a section 106 Agreement is entered into on a voluntary basis. The SPD will be amended to read: 'The Council will seek to enter into a Section 106 Agreement'.
<u>On site provision</u>		
RN002/6 Housing Corporation	Why limit the use of commuted sums to within 3km? How will the commuted sum be calculated?	Financial contributions will be targeted, not limited, to within 3km of the application site. The Council's preference is for on-site provision but in exceptional circumstances off-site provision or as a last resort financial contributions will be sought close to the qualifying site and within the same settlement. This will ensure that a balance of market and affordable provision is made to contribute to creating mixed and balanced communities. The Local Plan makes reference to 3km. It is considered that this is a suitable distance from which to ensure good accessibility and to retain community links and so to meet local needs.

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		The draft SPD indicates that a commuted sum/financial contribution must be large enough to ensure that the same number and type of affordable units can be secured on an alternative site. There may be additional costs to the Council in finding an alternative site or spending a financial contribution which it is expected will be part of the make-up of the financial contribution.
RN165/9 House Builders Federation	Requiring the affordable housing to be provided on site is contrary to paragraph 4.114 of the adopted Local Plan which allows the provision of a financial contribution.	The SPD does not exclude the provision of a financial contribution. The Council's preference is for on-site provision but in exceptional circumstances off-site provision, or as a last resort, financial contributions. The Council has in the past found difficulty in spending the monies from financial contributions due to their small scale.
RN329/6 William Davis Ltd	Accept the presumption for affordable housing to be provided on site but no justification for the Council 'having to be convinced that off site provision will bring benefits in the form of more or better affordable housing' in order for it to be accepted. It may be that off site provision assists other Council objectives such as regeneration. Off-site commuted sums may be used to secure affordable housing on otherwise difficult brownfield sites where development may not otherwise be viable and where priority needs may otherwise not be met.	The draft SPD indicates that a commuted sum/financial contribution must be large enough to ensure that the same number and type of affordable units can be secured on an alternative site. There may be additional costs to the Council in finding an alternative site or spending a financial contribution which it is expected will be part of the make-up of the financial contribution. However, it is considered that it is not appropriate to seek additional benefits over and above those that would have been provided on site. The SPD will be amended to delete the two sentences 'The developer will have to prove ... proposals will have to be exceptionally attractive.'
RN361/4 GVA Grimley (Jelson Ltd)	It is queried why the Council would seek 'additional benefits' from a financial contribution in lieu of on site provision when this is at odds with Circular 1/97.	The draft SPD indicates that a commuted sum/financial contribution must be large enough to ensure that the same number and type of affordable units can be secured on an alternative site. There may be additional costs to the Council in finding an alternative site or spending a financial contribution which it is expected will be part of the make-up of the financial contribution. However, it is

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		considered that it is not appropriate to seek additional benefits over and above those that would have been provided on site. The SPD will be amended to delete the two sentences ‘The developer will have to prove ... proposals will have to be exceptionally attractive.’

Extract from Minute of Cabinet Meeting held on 1st September 2005.

CHARNWOOD LOCAL DEVELOPMENT FRAMEWORK: AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT – RESPONSE TO CONSULTATION

A report of the Director of Development on responses to the consultation in respect of the Affordable Housing Supplementary Planning Document and seeking approval for the adoption of the document, with recommended changes, was submitted (item 5 on the agenda filed with these minutes).

The Director of Development referred to corrections to the report and the proposed changes to the Supplementary Planning Document in relation to paragraphs 30, 33, 34, 35, 37 and 42.

RESOLVED

1. **That the Affordable Housing SPD, incorporating the amendments identified at Appendix 2 and the further amendments outlined by the Director of Development, be adopted on 23rd September 2005 and made available as directed by regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2004.**
2. **That authority be delegated to the Director of Development, in consultation with the Cabinet Lead Member for Development Services, to make any minor revisions to the Affordable Housing SPD subsequently identified prior to adoption.**

REASONS

1. To meet the requirements of Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2004.
2. To enable the timely adoption of the SPD.