

COMMITTEE	CABINET
DATE	13 September 2017
SUBJECT	Affordable Housing Supplementary Planning Document (SPD)
REPORT OF	Director of Strategy, Planning & Regeneration

Ward(s) All

Purpose To seek Cabinet endorsement of the Affordable Housing Supplementary Planning Document (SPD) for formal adoption at Full Council on 15 November 2017.

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Recommendations

1. That Cabinet endorse the Affordable Housing SPD as set out in Appendix 3, and recommend its adoption by Full Council.
2. That Cabinet endorse, and recommend to Full Council, the revocation of the Affordable Housing Implementation Technical Note (adopted 2013) as set out in Appendix 4.
3. That Cabinet delegate authority to the Director of Regeneration and Planning in consultation with the Cabinet portfolio holder to make any minor or technical adjustments found necessary in the Affordable Housing SPD before it is presented to Full Council.

1.0 Introduction

1.1 There is an on-going need for the provision of affordable housing in Eastbourne. The private rented sector doubled in the period between 2001 and 2011 whilst the proportion of households that live in affordable housing and mainly rent from social housing landlords fell slightly over the same period. Analysis from the Strategic Housing Market Assessment (2017) suggests that this is a result of challenges with the delivery of affordable housing and increasing unaffordability of owner occupation as house prices have continued to rise, as without dual incomes and/or access to savings/equity the owner occupied market remains unaffordable to the vast

majority of households.

- 1.2 A significant proportion of affordable housing is delivered through the planning system. As part of planning permissions, Local Plan policy requires that applicants for housing developments make a contribution towards the delivery of affordable housing, either on-site or elsewhere in the town.
- 1.3 As a result of changes in national policy and updated information on development viability, Eastbourne Borough Council has prepared a new Affordable Housing Supplementary Planning Document to update the position relating to affordable housing contributions sought from development.
- 1.4 A Supplementary Planning Document (SPD) is a planning policy document that builds upon and provides more detailed advice or guidance on the policies in a Local Plan. SPDs are material planning considerations in the determination of planning applications.
- 1.5 The Affordable Housing SPD will provide detailed explanation in support of the implementation of Policy D5: Housing of the Eastbourne Core Strategy Local Plan 2006-2027 (adopted 2013). It contains advice relating to the standards required of the range of residential sites in order to deliver the affordable housing necessary to meet local needs.
- 1.6 A draft Affordable Housing SPD was published for consultation with the local community and other stakeholders for an 8 week period between 26 May and 21 July 2017. The results of the consultation are detailed in this report.
- 1.7 The Affordable Housing SPD now needs to be adopted by Full Council, following endorsement from Cabinet. Once adopted, the Affordable Housing SPD can be used to help secure affordable housing contributions in development. The Affordable Housing SPD will replace the Affordable Housing Implementation Technical Note (adopted 2013), which will need to be rescinded.

2.0 Background

- 2.1 Policy D5: Housing of the Eastbourne Core Strategy Local Plan, which was adopted in 2013, required all development involving a net increase in housing units to make a contribution towards affordable housing. As market conditions vary across the town, the level of contribution required varies across the town. The level of contribution represents a starting point that can be negotiated if evidence can prove it would make development unviable.
- 2.2 In 2013, an Affordable Housing Implementation Technical Note was published, which provided an explanation of how Policy D5 will be implemented, including the type of affordable housing to be sought, how the financial viability of development will be assessed and how any commuted

sum payments will be calculated.

- 2.3 However, in 2014 the Government introduced a policy through a Written Ministerial Statement whereby developments of 10 units or less would be exempt from affordable housing contributions. This policy has since been transposed into national planning guidance¹. This means that Core Strategy Policy D5 can no longer be implemented as it was originally intended and now contributions can only be sought of developments of 11 units or more.
- 2.4 The Affordable Housing SPD updates the Affordable Housing Implementation Technical Note to take account of the changes to the contribution threshold, and also to update the considerations that will be taken into account in assessing viability of development and the indicative values used to calculate commuted sums.

3.0 Approach to Affordable Housing Contributions

- 3.1 National Planning Guidance is clear that planning obligations, including those in the form of affordable housing contributions, should not prevent development from coming forward².
- 3.2 In order to take account of development viability, the Core Strategy divides the neighbourhoods in the town into 'High Value' and 'Low Value' neighbourhoods, which reflects disparity between house prices and impacts on the viability of development. This is established through Core Strategy Policy D5 and cannot be changed through this SPD.
- 3.3 Since the introduction of the national threshold, an affordable housing contribution will be required where a development results in the creation of 11 or more residential units. The strong presumption is that the affordable housing contribution should be delivered on-site, unless off-site provision, free serviced land or a financial contribution (commuted sum) in lieu of on-site provision can be robustly justified.
- 3.4 Through Core Strategy Policy D5, the starting point for affordable housing contribution is set at 40% in 'High Value' neighbourhoods and 30% in 'Low Value' neighbourhoods. For example, for a development of 15 residential units in a 'High Value' neighbourhood, the affordable housing contribution would be 6 affordable units ($15 \times 40\% = 6$).
- 3.5 Where evidence proves that this level of contribution will not result in a viable development, the contribution can be negotiated to a level that will enable a viable development.

¹ <https://www.gov.uk/guidance/planning-obligations> (Paragraph: 031, Reference ID: 23b-031-20161116)

² <https://www.gov.uk/guidance/planning-obligations> (Paragraph: 004 Reference ID: 23b-004-20150326)

- 3.6 The new SPD, which will replace the 2013 Affordable Housing Implementation Technical Note, sets out:
- Policy requirement for the delivery of affordable housing on all residential development sites;
 - Type and standard of affordable housing that is likely to be sought;
 - Assessment of financial viability of the development;
 - Calculation of any commuted sum payments;
 - Delivery agencies for the affordable housing.

4.0 Planning application process

- 4.1 The SPD provides a detailed summary of the stages involved in seeking affordable housing contributions, from pre-application stage through to submission and determination of a planning application.
- 4.2 Applicants are encouraged to undertake pre-application discussion to discuss financial viability to deliver the affordable housing requirements. During these discussions, regard will be made to:
- The viability of development, considering the need and cost of supporting infrastructure on and off the site and any unavoidable and necessary site remediation to resolve environmental hazards;
 - The location and character of the site;
 - The tenure of affordable housing and type of dwelling units required in relation to the housing needs and the viability of specific developments;
 - The current availability of affordable housing in the local area when measured against demand for such accommodation; and
 - Any updated national policy and/or guidance to be implemented.
- 4.3 If a developer considers that the mandatory requirements of the affordable housing policy cannot be met on a particular site, this must be justified in an evidenced and 'open-book' financial viability assessment and supporting statement, including all necessary information to demonstrate and justify residual values. If an independent opinion from a viability expert is required to corroborate the evidence, this will be at the expense of the applicant.

5.0 Commuted Sum

- 5.1 If it is not possible to deliver affordable housing on-site or off-site, or if the required contribution results in a percentage of an affordable unit to be delivered, then commuted sum payments will be considered. The SPD sets out how commuted sums will be calculated.
- 5.2 The SPD sets out an affordable housing payment table, which identifies the required financial contribution per square metre for different types and sizes

of development. This is used to calculate what total financial contribution is required towards affordable housing.

- 5.3 In the 'Low Value' Market Areas, negative viability is likely to be demonstrated for some types of residential development if the affordable housing policy is delivered. Where the commuted sum payment table in the SPD (Appendix 3, Table 3, p24) shows a potential negative viability level within the 'Low Value' Market Area, a commuted sum payment will not be requested. Also, if a commuted sum requirement equates to less than £1,000 for the whole development scheme, then a financial contribution will not be sought for the development.

6.0 Consultation

- 6.1 The Draft SPD was published for consultation for an 8 week period between 26 May and 21 July 2017. During the consultation on the Affordable Housing SPD, a total of 8 representations were received. This included representations from Bespoke, Natural England, Southern Water, East Dean & Friston Parish Council, RentPlus, Highways England and Historic England, and one individual.

- 6.2 The representations and the recommended officer response to the representations are contained in Appendix 1. A schedule of changes recommended in light of those representations is provided as Appendix 2. An amended version of the Affordable Housing SPD as a result of the recommended changes is provided as Appendix 3. A summary of the main issues raised during the consultation is provided below.

6.3 Consistency with emerging national policy approach

- 6.3.1 A representation raised a concern that the starting point for negotiating tenure mix does not yet reflect the emerging policy approach proposed by successive Government consultations, which seek to widen the definition to allow an even more flexible and responsive set of tenures. The representation considers that it is necessary to respond to the Government's agenda by widening the types of affordable housing that will be encouraged in the Borough.

- 6.3.2 The starting point for tenure mix of affordable housing is identified in Core Strategy Policy D5: Housing as being 70:30 Rented to 'shared ownership', and it is not possible to change adopted policy through a SPD. However, the SPD does state that there is flexibility to amend the balance between rented and shared ownership within a development to take account of up-to-date intelligence about local housing needs, and that the Council may also consider adjusting the tenure mix of a scheme if it is necessary to secure the viability of the development.

6.3.3 Therefore it is considered that the SPD has been developed to be sufficiently flexible enough to accommodate future changes to national and local policy. The document will be reviewed regularly and in reference to changes to national policy, local policy and local evidence. As such, no changes are proposed to the SPD as a result of this representation.

6.4 Space and Accessibility Standards

6.4.1 A representation raised a concern that the space and accessibility standards identified in the SPD are not contained in Local Plan policy, and the cumulative impacts of standards could create a burden on viability of development. It is therefore not consistent with the national Planning Policy Guidance.

6.4.2 It is accepted that the national space standards are not reflected in local policy due to the Core Strategy being adopted prior to the publication of the DCLG's Space Standards in March 2015. However, Core Strategy Policy B2: Creating Sustainable Neighbourhoods requires development to meet certain criteria that includes *protect(ing) the residential and environmental amenity of existing and future residents*. The national space standards are considered to be an acceptable guide as to what level of space provision would be required in order to ensure that residential amenity is not adversely impacted, and therefore how Core Strategy Policy B2 is applied.

6.4.3 It is considered that the Affordable Housing SPD has in-built flexibility and in this sense it is not overly prescriptive. For example, the SPD identifies that requirements will be applied in a flexible way on a site by site basis taking into consideration other planning considerations that may affect delivery. It is believed this approach will ensure that development remains viable.

6.4.4 However, in order to ensure that it is clear that the space standards are guidelines rather than policy, reference to space standards expectations will be amended to signify that they are guidelines that will be used to ensure that residential amenity of existing and future residents is not adversely impacted.

6.5 Infrastructure and design issues

6.5.1 A representation raised a concern that there is no real vision for how housing can provide anything wider than just the buildings themselves, and that the SPD does not refer to design and sustainable travel options. In addition, another representation requested that the SPD consider traffic flows in and out of town.

6.5.2 In response to these representations, it should be noted that the Affordable Housing SPD does not set out new Local Plan policy; it only provides guidance on the implementation of an existing policy (Core Strategy Policy

D5). It is not within the scope of the Affordable Housing SPD to consider design or infrastructure. These issues will be considered through the preparation of the new Eastbourne Local Plan.

7.0 Implications

7.1 Legal Implications

7.1.1 The Affordable Housing SPD has been prepared in order to comply with Regulations 12 and 13 of the Town & Country Planning (Local Planning) (England) Regulations 2012, and with regard to the requirements of the National Planning Policy Framework.

7.1.2 Regulation 12 requires that before the SPD is adopted, a statement setting out details of those consulted when preparing the SPD, together with a summary of the main issues raised, must be prepared. Any relevant issues raised during the consultation will need to be addressed in the SPD. The Statement of Consultation is a background paper to this report.

7.1.3 Following adoption, there is a three month period where any person aggrieved by the decision to adopt the SPD may make an application to the High Court for judicial review. Any application for judicial review should be made promptly and in any event, no later than 3 months after the date of adoption (i.e. no later than Friday 16 February 2018).
(Legal Implications Provided - 23.08.17 - 6280-LDC-JCS)

7.2 Financial Implications

7.2.1 There are no financial implications to the Council as a direct result of this report.

7.3 Human Resource Implications

7.3.1 The implementation of the Affordable Housing SPD will be through the usual work of the Planning Policy and Development Management functions, and therefore it is not expected that there will be a significant resource implication for the Council.

7.4 Equalities and Fairness Implications

7.4.1 The Affordable Housing SPD helps to secure the provision of affordable housing, which may have a positive impact on people in need of housing that cannot be met by the market. This includes young people and older people who have problems accessing appropriate housing. This will help eliminate discrimination in access to housing, help equality in housing opportunities and help to foster good relations with people who need to access specialist housing.

7.4.2 An Equalities Impact Assessment for the Affordable Housing SPD is a background paper to this report.

8.0 Conclusion

8.1 A new Affordable Housing SPD has been prepared to provide updated detail on the implementation of Core Strategy Policy D5: Housing, specifically in relation to affordable housing contributions. The new SPD will replace the existing Affordable Housing Implementation Technical Note and reflects changes in national policy and development viability in Eastbourne.

8.2 Public consultation was undertaken on a draft Affordable Housing SPD, resulting in 8 representations being received. As a result of these representations, a small number of modifications to the Affordable Housing SPD are recommended.

8.3 In order for the Affordable Housing SPD to be formally adopted, it requires approval from Full Council. Cabinet are requested to endorse the Affordable Housing SPD and recommend to Full Council that the Affordable Housing SPD be formally adopted.

Background Papers:

- Eastbourne Core Strategy Local Plan 2006-2027 (adopted 2013)
- Affordable Housing Supplementary Planning Document (EBC, 2017)
- Affordable Housing SPD Sustainability Appraisal Screening Report (EBC, 2017)
- Affordable Housing SPD – Statement of Consultation (EBC, 2017)
- Affordable Housing SPD Equalities Impact Assessment (EBC, 2017)
- Strategic Housing Market Assessment (Arc4, 2017)
- National Planning Policy Framework (DCLG, 2012)
- Town & Country Planning (Local Planning) (England) Regulation 2012

To inspect or obtain copies of the background paper, please refer to the contact officer listed above.

APPENDIX 1

Table of Representations Received on Draft Affordable Housing SPD

Rep ID	Name	Representation	Officer Response
AH_SPD/1	Paul Humphreys (Bespoke)	<p>There is no real vision of how housing developments can provide anything wider than just the buildings themselves.</p> <p>Bespoke want the SPD to reflect a vision of a more sustainable town with active travel options. I would refer you to Wealden generally, but Hailsham specifically, as to good practice and what is required. They have the idea of a green corridor for active travel with each new development connecting to this solution. In Wealden this is an enhanced Cuckoo Trail.</p> <p>Design should ensure that there are direct routes for pedestrians and cyclists. Too often meandering streets are built to slow traffic but add to the distance for pedestrians. Designs should have permeability for non-vehicle traffic and given this as pre-design guidance</p> <p>Design should ensure that cars cannot, or need not park, on the pavements.</p> <p>Build community resources, open spaces and schools that people can get to without the need for driving</p>	<p>The Affordable Housing SPD does not set out new Local Plan policy; it only provides guidance on the implementation of an existing policy (Core Strategy Policy D5). It is not within the scope of the Affordable Housing SPD to consider how development can provide anything wider than just the buildings themselves, or to introduce active travel options.</p> <p>The Eastbourne Local Plan 2015-2035, which is currently under preparation, will review all planning policy and create new policies for the growth of the town over the plan period. Issues such as design and travel options could be considered through the new Local Plan.</p>
AH_SPD/2	Gaurav Bijlani	<p>I am glad you are thinking of affordable housing.</p> <p>I would like you to look at traffic flow in and out of town and near A27, DGH, Lottbridge roundabout etc.</p> <p>As we are growing as a community, we need traffic to flow and make this town inviting to habitants and visitors alike.</p> <p>If part of affordable housing funding is used for 21st century would be appreciated.</p>	<p>The Affordable Housing SPD provides guidance on the implementation of an existing policy (Core Strategy Policy D5), and therefore cannot address issues relating to highways infrastructure.</p> <p>The Eastbourne Local Plan 2015-2035, which is currently under preparation, will consider the level of growth required in Eastbourne over that period, and identify the infrastructure issues that need addressing to accommodate</p>

Rep ID	Name	Representation	Officer Response
			that growth, including addressing issues associated with highways.
AH_SPD/3	Sharon Jenkins (Natural England)	Whilst we welcome this opportunity to give our views, the topic of the Affordable Housing Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Comments noted.
AH_SPD/4	Charlotte Mayall (Southern Water)	I confirm we have reviewed the document, and that Southern Water has no comments to make at this time.	Comments noted.
AH_SPD/5	Katrina Larkin (East Dean & Friston Parish Council)	East Dean and Friston parish council's planning committee took note of your draft Affordable Housing SPD at their meeting on 20th June 2017. They generally welcome your proposals, and thank you for giving them the opportunity to comment, but do not wish to make any specific comments on the draft.	Comments noted.
AH_SPD/6	Meghan Rossiter (Tetlow King Planning) on behalf of Rentplus	The starting point for negotiating tenure mix, whilst in line with existing policy, does not yet reflect the emerging policy approach proposed by successive Government consultations. This includes the introduction of rent to buy within the National Planning Policy Framework, which sought to widen the definition to allow an even more flexible and responsive set of tenures that better reflects the reality of delivering affordable housing across the country. Whilst Eastbourne experiences a continued acute need for affordable housing, particularly for family sized housing, it is considered necessary to respond to the Government's agenda by widening the types of affordable housing that will be encouraged in the Borough. Rent to buy is not an intermediate tenure, instead being defined more clearly as a hybrid, providing affordable rent for the period in which tenants save towards full purchase	It is appreciated that national policy with regards to the definitions of affordable housing is likely to evolve over time. With this in mind, the Introduction of the Affordable Housing SPD explains that the document 'has been developed to be sufficiently flexible enough to accommodate changes to national and local policy. The document will be reviewed regularly and in reference to changes to national policy, local policy and local evidence'. In addition, para 2.2 of the SPD refers to future changes in the definitions of affordable housing superseding the definitions set out in the SPD. In terms of tenure mix, the starting point is identified in Core Strategy Policy D5: Housing as being 70:30 rented to 'shared ownership', and it is not possible to change adopted policy through a SPD. However, Core Strategy Policy D5 states that proposals for

Rep ID	Name	Representation	Officer Response
		<p>of their home. As tenants rent for between 5 to 20 years at an affordable rent the model does not fit within the current definition of intermediate housing; the specifics of the Rentplus model are discussed more fully in the enclosed Statement. As a hybrid model, the tenure enables households to access affordable rented housing that does not require them later to move house in order to purchase, or to staircase ownership; this gives rent to buy households the certainty of a secure tenancy and the ability to achieve their aspiration to own their own home. For the duration of the tenancy the homes are managed by the partner Registered Provider, enabling the family time to integrate with the surrounding community and contribute to their local area. This contributes to the creation of stable and balanced communities.</p> <p>The Rentplus model seeks to enhance the affordable housing already being delivered in the borough, either as a standalone product or as part of the overall affordable housing offer on mixed development sites. With house prices and rents continuing to rise beyond reach for many within Reading, Rentplus provides an opportunity for those trapped by not being able to save for a mortgage deposit, to use an affordable rent period to save towards purchasing their home. This can have a real impact on affordability, improving the ability to deliver even more affordable housing on residential schemes across the Borough, and enabling even more households to access housing they can afford.</p>	<p>housing must take appropriate account of the need identified in the most up-to-date strategic housing market assessment with particular regard to size, type and tenure of dwellings. The SPD explains that the affordable housing requirement will be applied in a flexible way on a site-by-site basis, and there is flexibility to amend the balance between rented and shared ownership within a development to take account of up-to-date intelligence about local housing needs. The Council may also consider adjusting the tenure mix of a scheme if it is necessary to secure the viability of the development.</p> <p>In addition, Section 8 of the SPD explains that 'Eastbourne Borough Council is willing to work with housing providers which are not registered with HCA as well as those housing providers which are registered with HCA, in order to maximise the opportunities to provide affordable housing in Eastbourne Borough.' The intention is to maximise affordable housing in the Borough. To this end, the Council will work with a number of developers and providers, which may use different models and deliver various affordable housing tenure types.</p> <p>Therefore it is considered that the SPD has been developed to be sufficiently flexible enough to accommodate future changes to national and local policy. The document will be reviewed regularly and in reference to changes to national policy, local policy and local evidence. As such, no changes are proposed to the SPD as a result of this representation.</p>
AH_SPD/7	Meghan Rossiter (Tetlow King Planning) on behalf of Rentplus	Whilst paragraph 3.10 (and Section 6) indicates that the Council will seek to deliver all affordable housing in accordance with the nationally prescribed space and accessibility standards, the adopted Plan does not include these and the PPG specifically states:	It is accepted that the national space and accessibility standards are not reflected in local policy. This is due to the Core Strategy being adopted prior to the publication of the DCLG's Space Standards in March 2015. However, it is considered that the amount of space provided by accommodation can have a significant effect on residential

Rep ID	Name	Representation	Officer Response
		<p><i>"Where a local planning authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard."</i> (Paragraph: 018 Reference ID: 56-018-20150327)</p> <p><i>"Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations ... They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements."</i> (Paragraph: 008 Reference ID: 56-008-20160519)</p> <p>It is also important to note that the NPPF emphasises that the site and scale of development in plans should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. In order to be appropriate, the cumulative impact of these standards and policies should not put the implementation of the plan at serious risk; the implementation of the optional technical standards has potentially major consequences for viability and should only be considered through a review of the Eastbourne Plan. Introducing the standard through the SPD does not comply with the PPG and therefore all reference to the national space and accessibility standards should be removed until such time as the Borough Council introduces such policies in the Local Plan.</p>	<p>amenity, which may impact on the acceptability of a development proposal.</p> <p>Core Strategy Policy B2: Creating Sustainable Neighbourhoods requires development to meet certain criteria that includes protect(ing) the residential and environmental amenity of existing and future residents. The national space standards are considered to be an acceptable guideline as to what level of space provision should be required in order to ensure that residential amenity is not adversely impacted.</p> <p>Whilst not meeting the space standards may not on its own be an acceptable reason for refusing development, it is considered the accommodation provided at significantly below this standard will have a negative impact on residential amenity and could be refused in accordance with Core Strategy Policy B2.</p> <p>It is considered that the Affordable Housing SPD has in-built flexibility and in this sense it is not overly prescriptive. For example, the SPD identifies that requirements will be applied in a flexible way on a site by site basis taking into consideration other planning considerations that may affect delivery. It is believed this approach will ensure that development remains viable.</p> <p>However, in order to ensure that it is clear that the space standards are guidelines rather than policy, reference to space standards expectations will be amended to signify that they are guidelines that will be used to ensure that residential amenity of existing and future residents is not adversely impacted.</p> <p>In terms of accessibility standards, the SPD will be amended to make it clear that although it is the Council's desire to see affordable housing built to Level 2 of the Accessibility Standard and comply with require M4(2) in the</p>

Rep ID	Name	Representation	Officer Response
			Building Regulations, the Council is unable to insist upon this.
AH_SPD/8	David Bowie (Highways England)	Having reviewed the published documentation, we do not have any comments on the Eastbourne Borough Council Affordable Housing Supplementary Planning Document	Comments noted.
AH_SPD/9	Alan Byrne (Historic England)	Historic England has no comments to make, in our view the document deals with matters outside our remit and raises no issues that are likely to impact on the historic environment.	Comments noted.

APPENDIX 2

Schedule of Changes to the Draft Affordable Housing SPD

Note: Deleted text highlighted by ~~strikethrough~~. New text highlighted in red and underlined.

Ref	Section	Modification
C/1	Policy Guidance	<p>Amend para 3.4:</p> <p>The Community Infrastructure Levy (CIL) Charging Area covers all areas within the local authority boundary excluding the South Downs National Park (the South Downs National Park <u>Authority</u> adopted CIL in April 2017). However, the regulations regarding CIL give full relief from paying the levy on the portions of the chargeable development intended for affordable housing. Eastbourne has no affordable housing requirement on developments of 10 (net) or less dwelling units which have a maximum combined gross floorspace of no more than 1,000 square metres (sqm). This reflects the national policy position on this matter.</p>
C/2	Policy Guidance – Development Site Standards and Characteristics	<p>Amend para 3.9:</p> <p>A particular site’s characteristics and the development as a whole should be reflected in the affordable housing mix of dwelling tenure, type and size, taking into account the expected <u>space standards guidelines</u> for affordable housing. The Council’s planning team will advise on the exact tenure, type and size split on each site through pre-application discussions.</p>
C/3	Policy Guidance – Development Site Standards and Characteristics	<p>Amend para 3.10:</p> <p>It is expected that affordable housing provided on-site will be subject to the same standards and be indistinguishable from the open market housing. The provision of on-site affordable housing should be integrated into the layout of the development through ‘pepper-potting’ within market housing, in order to fully reflect the distribution of property types and sizes in the overall development. The Council understands that pepper-potting may not be possible on developments sites consisting of 25 dwellings or less. For developments consisting of more than 25 dwellings, discussions will be required between the Council and the applicant/developer on a site-by site basis. It is expected that the nationally described space standards, as set out in Section 6 of this document, will also be adhered to. <u>In order for development to comply with Core Strategy Policy B2: Creating Sustainable Neighbourhoods, and in</u></p>

Ref	Section	Modification
		<p><u>particular, protect the residential and environmental amenity of existing and future residents, the nationally described space standards will be used as a guideline as to what size of accommodation is desirable to ensure residential amenity is protected.</u></p>
C/4	Policy Guidance – Development Site Standards and Characteristics	<p>Amend para 3.12:</p> <p>The housing should comply with <u>consider</u> all relevant design and quality codes and standards as set out by the Homes and Communities Agency or other associated national bodies, as well as any corresponding local guidance and specifications.</p>
C/5	Policy Guidance – Development Site Standards and Characteristics	<p>Add new paragraph after para 3.12:</p> <p><u>Information gathered from the Council’s Housing Register provides an indication of the need for each dwelling type. With reference to this, the Council will expect the affordable housing units within each development to be provided in line with the following dwelling mix:</u></p> <ul style="list-style-type: none"> • <u>1 bedroom: 40 per cent;</u> • <u>2 bedrooms: 30 per cent;</u> • <u>3 bedrooms: 20 per cent; and</u> • <u>4+ bedrooms: 10 per cent.</u>
C/6	Policy Guidance – Delivery of Affordable Housing Provision	<p>Amend para 3.16:</p> <p>The provision of affordable housing will be subject to a Nominations Agreement between the Council and the housing provider. A copy of the template of a Nominations Agreement will be attached as part of the Section 106 Agreement template. This will be made available at the moment the planning application is made.</p>
C/7	Policy Obligations – Prioritisation of Affordable Housing	<p>Amend bullet points in para 4.6:</p> <ul style="list-style-type: none"> i. The Council’s on-site preferred mix; ii. An on-site alternative mix to be agreed upon by the Council and the relevant developer(s); iii. A level of affordable housing on-site which is less than the specified threshold; iv. Serviced plots <u>onsite</u>;

Ref	Section	Modification
		<p><u>v. Service plots offsite;</u></p> <p><u>vi. Transfer of land;</u></p> <p><u>vii. A commuted sum</u></p>
C/8	Policy Obligations – Section 106 agreements and Unilateral Undertakings	<p>Add new paragraph after para 4.20:</p> <p><u><i>Mortgagee in Possession Clauses</i></u></p> <p><u>In consultation with the applicant/developer the Council will look to support Mortgagee in Possession Clauses which have a time period of three months or less.</u></p>
C/9	Expected Standards	<p>Amend Section Heading:</p> <p>Expected Standards <u>Guidelines on Standards of Development</u></p>
C/10	Expected Standards	<p>Amend para 6.1:</p> <p>The Council's expected space standards for affordable housing, taken from the DCLG document Technical housing standards – nationally described space standard are set out in Table 4. <u>The Council will use the nationally described space standards, taken from the DCLG Technical Housing Standards, as a guideline for space provision in housing development, including affordable housing, to ensure that development protects the residential amenity of existing and future residents in accordance with Core Strategy Policy B2: Creating Sustainable Neighbourhoods. The space standard guidelines are set out in Table 4.</u></p>
C/11	Expected Standards – Quality of Design, Materials and Construction	<p>Amend para 6.4:</p> <p>The Council requires <u>would prefer that</u> all affordable homes to be built to Level 2 of the Accessibility Standard, and in all cases to comply with requirement M4(2) of Approved Document M: access to and use of buildings, volume 1: dwellings. There may also be a requirement <u>desire</u> for M4(3) category homes to be supplied on the site, which will be advised at the point of the planning application being submitted. Further information regarding building regulations is set out in the Department for Communities and Local Government's Approved Documents.</p>

Ref	Section	Modification
C/12	Appendix B – Commuted Sum Methodology	<p>In Appendix B, amend text:</p> <p>DVS have assessed the average development costs per unit type taking account of their own experience and similar studies carried out in the region as follows:</p> <p>Build Costs – BCIS median rates adjusted for location</p> <p>a. Flats – £1,481 per sqm</p> <p>b. Houses – £1,216 per sqm</p> <p>c. Bungalows – £1,440 per sqm</p> <p>d. Site and Infrastructure Costs – Flats 10%, Houses and Bungalows 15%</p> <p>e. External Works – 5%</p> <p>f. Contingencies and Insurances – 4.5%</p> <p>g. Planning Fees – £500 per unit</p> <p>h. Survey Costs – £500 per unit</p> <p>Professional Fees – 8.00 %</p> <p>Marketing and Sales Costs – 2% of sales value plus £600 per unit for legals</p> <p>Finance Costs – 7% including arrangement fees</p> <p>Land Costs – 1.75% fees etc plus holding cost of land for the development programme at 7%</p> <p>Developers Profit – 17.5% on private</p> <p><u>The Development Costs used in the Affordable Housing Commuted Sum Payment Table are based on information provided by the District Valuation Service (DVS) in Autumn 2016 and is set out in the tables below. The Serviced Plot Value is derived from the difference between the Development Value and the Development Cost.</u></p>
C/13	Appendix B – Commuted Sum Methodology	In Appendix B, add Viability Appraisals for each type of unit.

APPENDIX 3

Affordable Housing Supplementary Planning Document (2017)

Attached below

APPENDIX 4

Affordable Housing Implementation Technical Note (2013)

Attached below