

Summary of the consultation on the Affordable Housing SPD

In total, 92 representations were submitted by 11 individuals and organisations during a six week period of consultation from September 1st – October 13th 2008. This summary gives a brief picture of what the results were. A summary of each point made, the Council's response and proposed amendments are set out in 'Table 1. Consultation Schedule.' Whilst this consultation schedule has been produced at this stage it is still a draft document which may be subject to change.

Generally people have been very supportive of the production of the SPD and are pleased with its content. No comments have been received that suggest any major changes are required to either the content or structure. Many comments highlight a basic misunderstanding of some of the concepts sets out in the SPD. In view of this a number of changes are proposed to help improve the clarity of the SPD. In addition a number of the comments went beyond the scope of this SPD, such as comments on the state of the general housing market.

The key issues that arose during the consultation can be summarised as follows:

- The requirements for affordable housing: It was felt that there needed to be clearer justification for the inclusion of a 25% affordable housing figure, established from a robust viability assessment.
- Off-site provision and financial contributions: It was felt that the tenure basis on which the 60% developer contribution has been calculated needs to be made clearer. It was also considered to be wrong to set the contribution at a blanket 60% of OMV as this was felt to be contrary to PPS3.
- Section 106 Legal Agreement on Affordable Housing: Minor amendments have been suggested to the wording of this agreement.
- Design Standards: The standards set out in this section were generally well received. However, it is felt that there needs to be more consistency across the board.

It may be of interest to note that only four forms were submitted electronically.

The final results of the SPD consultation will be brought to a meeting of the Strategic Planning Committee on the 2nd December, together with a final draft of the Affordable Housing SPD, with a view to formally adopting the SPD in January 2009.,

Table 1 Consultation Schedule

Comment	Council's Response	Action Required
<p>Planning Issues Limited, representing Churchill Retirement Living Ltd.</p> <p>General comment: Production of the SPD is premature. Council has no saved policy or adopted policy.</p> <p>25% figure should be derived from a robust viability assessment</p> <p>Page 18: The design standards set in the SPD will result in a discrepancy between the standard of design of market dwellings and RSL units.</p>	<p>The driver for this document is the need to address the affordability issue and provide guidance on the delivery of affordable housing in the Borough.</p> <p>The need for clear guidance for developers, to manage the supply of affordable housing is recognised in the Service Improvement Plans for both the planning service and the strategic housing service, having been identified as a weakness in inspections of both areas. Every effort is therefore being made to produce such guidance and adopt it at the appropriate level in the planning system.</p> <p>When the Core Strategy is adopted, the SPD will supplement the affordable housing policy until then it will work to amplify emerging policy.</p> <p>Results of the Adams Integra economic viability overview suggest that 25% is an achievable target.</p> <p>This comment has not been justified, but it appears there is an assumption that the Council will not apply the same standards to Market Housing, however this is not the case.</p>	<p>None Page 6 of the SPD under 'status' justifies the timing of the SPD</p> <p>A statement on economic viability has been added to the 'Introduction and Context' on page 6.</p> <p>No change required.</p>

Page 22, off-site provisions and financial contributions: the SPD appears to be contrary to PPS 3 because the requirement for an off site contribution would result in the developer providing additional affordable housing in a potentially more expensive part of the borough.

Page 22 – 23 - financial contributions: To set the developer contribution at a blanket 60% of OMV is also contrary to PPS3 para.29 “of broadly equivalent value”. The developer contribution should be the difference between the combined cost of land, constructing the units and an element of on-costs such as fees, less the amount an RSL can pay from capitalising the rental income and the initial sales revenue and capitalised rental income. Circular 05/2005 Planning Obligations makes clear at Paragraph B7 “planning obligations should never be used purely as a means of securing for the local community a share in the profits of development.

Do not agree. We will require a contribution to off site provision which is broadly equivalent to the value of providing affordable housing on site. Further more if a developer is asked to make an off site contribution instead of building the affordable units on site this will result in 100% market housing being provided on the development site, thus the developer will maximise their profit, which will subsidise the cost of any off site contributions. It is accepted that this may need to be clarified in the SPD to avoid misunderstandings.

This is a valid point. The results of the economic viability study suggests that a developer contribution of 60% of OMV is too high. However, the re-rental calculations by the RSL will result in an OMV for the units.

Agreed. This is not the intention of off-site contributions. Using OMV in the way stipulated provides a transparent and accountable means of calculating commuted sums that will realistically lead to the provision of affordable housing off-site by the purchase of land or properties in the market place. It will not result in

Text amended on page 25 to avoid potential for misunderstanding.

Once the economic viability report has been finalised, the SPD will be amended to include a more appropriate developer contribution.

No change required.

<p>Developer Contribution Example – page 23 – the example calculation is incorrect. Current example shows a 40% requirement. Also the contributions should be geared towards the provision of social rented and shared ownership tenure as less developer subsidy is required to provide intermediate affordable housing than social rented units. Also the availability or not of affordable housing grant should also be factored into the calculation.</p>	<p>communities sharing in the profits of development. Agreed. The calculation needs amending</p> <p>Within the Borough, there is an apparent and clear need for social rented properties, which can be ascertained by the Housing Register. The need for shared ownership is less pronounced. However, the need for shared ownership is present within Newcastle-under-Lyme due to the borough and the locality accommodating key workers and university graduates. Furthermore, shared ownership tenure is being asked for on developments, so as to contribute to mixed communities. Through the economic viability study, the availability or not of affordable housing grant was factored into the calculation to determine an appropriate level of contribution.</p>	<p>Calculation on page 26 amended to reflect a 25% affordable requirement. Number of units proposed changed to 32. No change required.</p>
<p>Model S106 Agreement: Item 1.6 – “discounted price” should not be referred to as 60% of the OMV price of the affordable housing units. Price should be a matter of negotiation between the developer and the affordable housing provider. 1.7 - “Commutated sum” ditto.</p>	<p>Strongly disagree with the discounted price definition; as this is the set value, deemed to bring the accommodation into the realms of affordability.</p> <p>Same as above</p>	<p>No change proposed.</p> <p>No change proposed.</p>
<p>1.22 – Reference to “Registered Social Landlord” should be changed to include any other “affordable housing provider” which may not</p>	<p>The use of the term “Registered Social Landlord” is consistent with our definition of affordable housing; social rented and shared</p>	<p>No change proposed.</p>

be registered with the housing corporation.	ownership provided in partnership with an RSL at the appropriate tenure mix.	
Schedule 1 1.6 – Remove “and should not be inferior or distinguishable from the equivalent open market dwellings on the development”. The term “inferior” is subjective and cannot be defined. Also the affordable units will be built to the Housing Corporation’s standards and will be distinguishable from the market units.	As stipulated in the SPD, market dwellings and affordable dwellings must be built to the same standard, this statement outlines this requirement. This is line with national policy which stipulates that affordable elements must not be distinguishable from market housing to ensure mixed communities.	No change required.
2.2 – Change “best endeavours” to “reasonable endeavours” 3.6(a) – Ditto	Best endeavours should remain the wording – following advice from the legal department.	No change proposed.
Appendix 3 – affordable housing protocol Page 57 – To require a draft s106 agreement to be submitted with a planning application before an application will be registered is unreasonable and a waste of resource at the time of submission. What if the developer disagrees that a contribution should be made in which case the submission of a draft s106 agreement would not be necessary.	This is the adopted approach contained within the Council’s Developer Contributions SPD. When the local list for validation is adopted, the Council will expect an affordable housing statement and Head of Terms to be submitted with applications. When this list is agreed and in place, the Council will invalidate an application if this information is not submitted.	No change required.
Comments from session with RSLs and Housing Corporation. Proportions of affordable housing: supportive of a requirement of a minimum of 60% of the total affordable housing element to be social rented. Housing types: Need to emphasise the need for family housing, given that developers will tend to want to meet demand in	Noted Agreed. Although developers have to respond to market pressure, they can always choose which sector of the	No changes required. No change required

the apartments sector as this is more profitable.

Page 5: the SPD states “where land values fall the delivery of affordable housing is going to be that much harder”. This should refer to property values not land.

Mechanisms (Section 7): Recommend that developer/ applicant involves an RSL at early stage, especially as variations in tenure mix can make a significant difference. SPD should draw attention to fact that schemes are normally more viable for the RSL if the % of shared ownership is low.

Commutated sums: The SPD could make it clearer how the money will be spent.

Page 24: Table is wrong – there is a mistake in the worked example calculations. Calculation currently shows a requirement for 40% affordable housing. Section 6: Support intention to achieve a consistent high standard of design between both affordable and market housing.

Building for life standards not mentioned but code for sustainable homes is but level 2 will be a standard

demand to satisfy according to where a better profit can be made. The SPD emphasises the need for family housing within the Borough. Agreed.

Noted. This advice could be set out in the SPD

Noted. The Council has investigated how this is approached by other local authorities who do this as a matter of course. The economic viability study has enabled information to be presented on how much RSLs are able to pay for various properties. Propose changing example to make calculations easier. This could be done by adding a new column to the table showing the number of units. Noted

Agreed. The SPD will become out of date if it quotes standards which are liable to change in the

Amend page 5, para.2 to say “where property values fall the delivery of affordable housing is going to be that much harder.”

Advice added to text under section ‘Mechanisms for securing provision’.

Text amended on page 26 to provide greater clarity on the procedure for commuted sums and how they will be spent. Also include details on RSL payments to developers.

Calculation on page 26 amended, taking into account these suggestions - the total number of units has proposed has been changed to make the calculation easier. No change required

Section 6, design requirements, simplified and made less specific. It will instead work to

<p>requirement by 2010.</p> <p>Legal Agreement: Need to make sure scenario whereby RSL has flexibility to change the tenure type through a deed of variation. If an RSL cannot find customers for shared ownership the RSLs would be more than happy to go to renting.</p> <p>Discounted market housing: Should make it clear (on the cascading diagram) that we mean discounted in perpetuity. Also in the 2nd paragraph under “other types of housing...” Add details of the amount of discount, which is currently only identified in the draft legal agreement.</p>	<p>future either because of the phased implementation of government policy or updates to the Housing Corporation Standards change in the future.</p> <p>Agreed to change the legal agreement so that changes can be made by the RSL in certain events with the Council’s permission.</p> <p>Agreed</p>	<p>signpost developers to the Housing Corporation standards and any future updates as and when updates are published.</p> <p>Legal Agreement amended to take on board this scenario.</p> <p>Cascading diagram amended to include this point. Under paragraph 2, page 9, a definition of discounted housing has been added.</p>
<p>Tetlow King Planning Representing the West Midlands RSL Planning Consortium</p> <p>Sections: 1 – 4: Support and welcome the content. Section 5: Requirements for affordable housing:</p> <p>Urban and rural thresholds suitable for Borough.</p> <p>Target of 25% strikes a reasonable balance.</p> <p>There should be specific allocations of land for affordable housing particularly in rural areas where there is an identified need. Rural exception sites should be proactively identified and</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>It is not the role of an SPD to allocate land. This is the role of a DPD, because this must be subject to consultation and public examination.</p>	<p>No Change required</p> <p>No Change required</p> <p>No Change required</p> <p>No Change required</p>

brought forward in conjunction with RSLs

Providing a mix of tenure and size of units across new developments should be encouraged through the Core Strategy in order to provide for a balanced community.

Design Requirements:

Concerned that 'pepper-potting' the affordable housing as opposed to grouping in small clusters can lead to management problems in some circumstances. To avoid management problems, we consider that the affordable housing should normally be clustered in groups of about 10-15 dwellings but with some flexibility to vary according to site circumstances. Pleas Council seek to ensure that a proportion of new affordable homes are built to Lifetime Homes Standard.

Mechanisms for securing provision:

Council should seek to prioritise on-site provision of affordable housing where this meets the local need. Accept proposed calculations for off-site contributions. Council should seek to ensure development on site is making the most efficient use of land and does not constitute underdevelopment to avoid the provision of affordable housing.

Do not entirely agree with the Council's proposal of using planning obligations to ensure that affordable housing remains

Noted, the Core Strategy does outline and encourage this approach.

It is recognised that for RSL management that the affordable housing, which consist of flats and apartments, that these should be clustered together. This has been discussed at the Section 106 working group and it was concluded it is preferable to provide the tenures in single blocks and to not mix tenure, for reasons of maintenance and management. It was considered that there should be no more than 10 affordable units in one cluster. This was particularly important for flats and maybe not such an issue for housing. Agreed. The section on the requirements for affordable housing stipulates that sites will be measured to their natural perimeters of the site defined by physical characteristics and that it will not be appropriate to divide a site into smaller components to avoid providing affordable housing provision.

RSLs do sometimes build market housing. To ensure that the affordable housing is delivered and the terms of the delivery are

No change required

Text on page 20, Section 6, amended to talk in terms of clusters.

No change required.

No change required.

<p>affordable in the long term. Affordable housing will usually be transferred to RSLs who are not-for-profit organisations whose purpose is to provide affordable housing to those in housing need. The use of S106 agreements is unnecessary when RSLs are providing affordable housing.</p> <p>Monitoring: Referring to indicators in the AMR etc and measuring them against clearly stated targets to judge the success of policies, is supported.</p> <p>Appendices: Appendices 1, 2 and 4 supported. Affordable housing protocol (appendix 3) is not fully up-to-date and needs to be updated in the light of the Council's current amendments for the validation of planning applications.</p> <p>Additional Comments: In addition to these comments, consider the following additional issues should be considered as part of the SPD:</p> <ul style="list-style-type: none"> • Full range of options for providing affordable housing; • Greater clarity in the main body of the SPD (as opposed to Appendix 4) on the Council's approach to working with RSLs. • Info required from developers regarding viability and particular site development costs • Interface with the 	<p>resolved with certainty, a S106 agreement is expected from all parties who wish to develop within the borough of Newcastle-under-Lyme.</p> <p>Noted</p> <p>Agreed. The last paragraph on pre-application discussions is out-of-date now that the new validation requirements have been proposed for adoption.</p> <p>Following clarification from the consultant, it was agreed that the full range of options, has been considered in the SPD. Disagree. This should remain as an appendix to ensure the main body of the document is clear and concise.</p> <p>This will become clearer once the viability study has been completed.</p> <p>Agreed.</p>	<p>No change required</p> <p>Text amended in Appendix 3 (Page 58) to reflect the Council's new proposed requirements.</p> <p>No change required.</p> <p>No change other than to make sure Appendix 4 is properly signposted in the document. Amendment made on page 23.</p> <p>Paragraph on economic viability added on page 28 to be linked with the procedures outlined in the developer contributions SPD. Linkages added to the</p>
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<p>Housing Strategy, Community Strategy and Local Strategic Partnerships.</p> <ul style="list-style-type: none"> Clarification of parameters for rural exceptions schemes including parish housing needs surveys, roles of parish councils and RSLs. 	<p>This is addressed in Section 4: Local Need.</p>	<p>'introduction and context' of the document on page 7.</p> <p>No change is required.</p>
<p>Advantage West Midlands</p> <p>Design Standards: The Agency would endorse applying Lifelong Home Standards and achieving the code for Sustainable Housing Level 3 as suggested within the draft document.</p> <p>Welcomes reference to the incorporation of on-site renewable energy.</p> <p>West Midlands Sustainability Planning Checklist may also be of assistance in formulating policy to ensure affordable housing is future proofed, as well as being a possible tool for assessing future housing schemes.</p> <p>Audley Rural Parish Council</p> <p>Supported housing needs – Individuals needs should be taken into account. Support should be given to help individuals to stay in their own area, with family and friends around to support them. Rented or private accommodation.</p> <p>Affordable rural housing should be for local people. Every effort should be made to help people find accommodation in their own area.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>The rolling five year programme of parish needs assessment provides locally specific evidence for identifying current and likely future housing requirements within the rural area – including the provision of affordable housing.</p> <p>Section 4: Local Need, deals with this issue. The Core Spatial Strategy aims to ensure that local rural housing needs are adequately met but the strategy is clear that there</p>	<p>See comments above re proposal to simplify Design section.</p> <p>No change required</p> <p>No change required</p> <p>No change required.</p> <p>No change is required.</p>

	<p>is no scope for development of a scale beyond that required for natural growth and in locations where there are very few local services. In applying the rural exceptions policy conditions could be imposed restricting occupancy</p>	
<p>The Tylerparkes partnership – Acting for Morston Assets Limited</p> <p>Very much welcome, and strongly support, efforts to regenerate and revitalise the area and the recognition that placing too onerous a requirement for affordable housing would jeopardise these investment and development objectives. Strongly believe a requirement for 25% affordable housing within the area covered by Newcastle AAP would undermine the objectives of creating a vibrant, high quality sustainable housing market. Clearly a shortage of aspirational properties in the most sustainable locations – within and close to the town centre – to meet the needs of the more highly skilled workforce vital to the renewal of the town centre. There is an opportunity to correct that imbalance and address that need as part of significant development opportunities in the town centre, including within the Waterside Quarter. Similar approach to that proposed for Stoke-on-Trent City Centre in the Core Strategy for zero affordable housing</p>	<p>Noted, however in the interests of promoting mixed communities, affordable housing is an essential requirement on all housing developments, within the borough, that meets the criteria outlined.</p> <p>The SPD outlines that affordable housing requirements will be consistently applied across all areas of the Borough. There is no intention to omit areas, such as the town centre, from contributing towards affordable housing. The required proportion of 25% is not high, and is lower than the prevailing proportion of affordable housing in the Town Centre, so would effectively, over time, reduce it. The requirement does nothing to reduce the encouragement of higher priced housing in the area.</p> <p>An SPD is not the document for setting new policy. The approach contained within the Core Strategy outlines that</p>	<p>No change required.</p> <p>No change proposed.</p> <p>No change</p>

<p>requirements, should be adopted in the area covered by the Newcastle AAP and included in the Affordable Housing SPD</p> <p>Higher value uses, such as market housing, including units which will appeal to a highly skilled workforce, will need to be promoted in the area covered by the Newcastle AAP to ensure the viability of the scale and type of redevelopment sought in the draft Newcastle Town Centre SPD. Seeking contributions towards affordable housing would, we believe, be considered as a disincentive to investment.</p>	<p>Stoke City centre has not benefited from a vibrant, high quality housing market. Whereas Newcastle town centre is an established housing market with an identified need for affordable housing.</p> <p>The Town Centre AAP was withdrawn in February 08</p> <p>The SPD advocates that market housing should not be distinguishable from affordable housing. There should therefore be no issue with integrating affordable houses within general market housing schemes within the town centre. In the interests of creating mixed communities, it is important that affordable housing contributions are sought in all areas of the borough.</p>	<p>No change</p>
<p>Thistleberry Residents Association</p> <p>There appears to be a tension in this document between:</p> <ul style="list-style-type: none"> • The availability of cheap affordable housing in Newcastle which is currently being upgraded and/or demolished • NBC wanting to improve the market by the building more executive type housing • The size of the empty unfit housing stock • The demolition of old stock but not building enough replacement housing. <p>These factors taken together produce shortages and demand.</p>	<p>The SPD sets out the requirements for developers when building new housing schemes. The key strategic issues identified are matters to be considered in higher policy documents. An SPD can not set policy; it can only amplify existing or emerging policy. It is true that the Council wishes to encourage upper market housing in the Borough, but at the right level. The requirement for 25% affordable housing is not inconsistent with this aim. It is a question of providing a balanced housing</p>	<p>No changes required.</p>

<p>This increases house prices, and leads to the outcome whereby homes can become unaffordable in any price band. It was not clear how this strategy would address or resolve these tensions other than getting developers to build more 'affordable' housing. Unfortunately, developers are not, in the main, philanthropic.</p>	<p>market. The demolition of affordable housing (in Cross Heath) is taken into account in setting the requirements for new affordable housing – in other words, there is no net loss.</p>	<p>No change required.</p>
<p>Little mention of bringing back into commission for rental or resale the 1000+ houses which are empty and the grants for refurbishment of old stock seem too few. Within the HA sector, there are several housing associations not utilising their total capacity: Aspire 85% stock fit; Touchstone 57% fit, WST 72% fit.</p>	<p>The point of the SPD is to clarify the Council's position to assist with the delivery of affordable housing and to ensure that developers do make an appropriate contribution towards it. It will also help developers to negotiate the right price for a site by knowing in advance how much affordable housing will need to be provided. The drivers for housing and the issues within the housing market realities are multifaceted. The Affordable Housing SPD does not and cannot address all the realities ranging from empty properties to regeneration. Newcastle-under-Lyme Borough Council has adopted various specific strategies and policies to address such issues. As an example, the issue of empty properties, a strategy is being formulated by the Private Sector Team, which will address this issue. The Affordable Housing SPD is a policy document designed to clarify the affordable housing requirements of any development within Newcastle-under-Lyme.</p>	<p>No change required.</p>
<p>Housing development in the past in Newcastle appears to be out of sync with what was needed or happening on the ground.</p>	<p>This is a general comment on the state of the housing market and it is not a matter that can be addressed in this SPD, of</p>	<p>No change required</p>

Residents would like to know what the situation is now that the current house prices are falling and how this affects need. Given that Newcastle and Stoke have low priced housing it seems odd that this is being demolished and replaced with more expensive houses.

Pg.30 The weekly incomes seem to be very high and at variance with those quoted in the Housing Strategy.

From having no apparent need for affordable housing to now having an annual need of 265+ (600 in the Housing Strategy) seems a quantum leap.

Given the produced figures of need there were only 4 applications for the Homebuy schemes in 2004/5 and only one in 2005/6 (pg.63) Does this mean that there is no need for this type of tenure or that people would prefer to rent?

Pg.13 makes reference to affordable homes in areas of shortage. Does this mean that high cost areas where there is no affordable housing would constitute an 'area of shortage'?

It would also be useful to

which the primary purpose is to set out the Council's position in respect of the provision of affordable housing.

The weekly incomes have been quoted from the North Staffs Strategic Housing Market Assessment 2008. This data is more up-to-date than that of the 2005 Housing Strategy and contains data from a different source.

The 2008 Assessment makes it clear that the housing market has changed significantly over the past few years. The average house price has risen significantly quicker in comparison to annual wages, creating a large need for affordable housing within the borough. The Council began requiring 20% affordable housing during 2006 and 2007.

The need for shared ownership is less pronounced, however, there is need for intermediate affordable models – universities and key workers. Also a menu of options helps to create mixed communities.

If there is an identified need within these areas, then this could be the case. Areas of shortage are identified through housing needs surveys which identify these issues.

The comment is not

No change required.

No change required.

No change required.

No change required.

No change required.

know the interpretation/ definition of 'decent' in this document.

The S106 agreement appears to be a standard legal document. It would be helpful to know how this has been made applicable to Newcastle – i.e. where alterations and adjustment to it have been made.

Pg.22 Commuted Sums
– if payment is required not to build affordable housing on a site there is a danger that affordable housing will be red-lined and segregated. How does this fit in with policies elsewhere for inclusion, mixed development and balanced communities?

Pg.22 Commuted Sums
– there seemed to be a large scope for affordable housing not to be built and for developers to pay not to build it. Current model does not guarantee that houses will be built and thus does not seem to do anything in particular to alleviate any shortage in particular geographical areas.

The affordable housing definition given can be very broadly interpreted since today there are very few people who can access housing without financial assistance. The whole area of rental/purchase/need and income/affordability etc need to be examined and analysed further in order to produce a more robust strategy to satisfy need.

understood. To the best of our knowledge there is no reference to 'decent' in the document.

The Section 106 agreement is not a standard legal agreement. It is a legal agreement which sets out the affordable housing obligations arising from the SPD, so that the developer is legally bound by these requirements. Disagree. The design requirements, outlined in Section 6, stipulate that regardless of location, affordable housing must be "seamlessly integrated and distributed throughout the development scheme consisting only of small groups".

Disagree. The intention of a commuted sum payment is, for in exceptional purposes, provision of affordable housing to be provided elsewhere. This is done through a S106 legal agreement, and does not mean affordable housing will therefore not be built at all. The money is always put towards provision elsewhere. The emphasis is however for developers to provide affordable housing on-site. The definition of affordable housing, contained within this document, has been taken from Government policy – PPS3 and is considered to be a fair definition of affordable housing. Detailed analysis has been undertaken through the commissioning of a Strategic Housing Market Assessment, which provides part of the

No change required.

No change required.

No change required.

No change required.

<p>Why have Council houses been sold and moved out of the affordable category? Why couldn't these houses have been cooptivised so that they could be sold back to the HA/LA?</p> <p>Stoke on Trent Housing Enabling Team –</p>	<p>evidence base to this document.</p> <p>Noted. This is a comment on past actions and not appropriate to the content of this document.</p>	<p>No change required.</p>
<p>Section 2: The Council's preference – Statements there is insufficient affordable housing of the right type etc and there is no lack of low priced housing, could be misconstrued.</p>	<p>The statement on low priced housing does have further commentary which ensures there is no confusion, it clearly outlines that there is an issue with houses being unattainable to a large number of people. This statement has been included to explain the Council's preference for social rented housing, because people do not have the income capacity to attain shared ownership properties, this does not dismiss the need for affordable housing.</p>	<p>No change required.</p>
<p>Supported Housing Needs – Need to clarify whether developers will be required to build specialist provision or simply to work with an RSL. Helpful to also identify priority groups for supported housing.</p>	<p>Valid point in light of the demographics structure of Newcastle. However, approach should not be prescriptive and should allow flexibility i.e. private and RSL – key consideration: design, layout, size, area etc</p>	<p>No change proposed.</p>
<p>Sui generis should be stated in plain English.</p>	<p>Next to sui generis a plain English definition could be added.</p>	<p>Text on page 10, under Supported Housing Needs, amended to also include the following definition "a use on its own, for which any change of use will require planning permission".</p>
<p>Section 4: Local Need – 'Need' for affordable housing can also be calculated using average</p>	<p>Agreed. This method should be added to the text as well.</p>	<p>On page 11, text on final part of paragraph has been amended. This will</p>

household incomes along with using average house prices for the specific area.

State clearly that affordable target % will not differ across the Borough but may be need to negotiate in respect of type and tenure.

Section 5: Quantity required – Need to stress that price developers pay for land should reflect the requirement to provide 25% affordable housing.

Clearly state whether 15% social rented target is a % of affordable provision or the whole development.

Housing types – Useful to compare the length of time eligible households may have to wait for access to a social rented property e.g. length of wait for family accommodation compared to 1 bed.

Section 6: Quality and Accessibility Standards- Lack of clarity with regards to lifetime homes standard. States that standards 'should' be met.

Lifetime homes paragraph should contain same level of information as the quality and design standards paragraph.

Section 7: Off-site provision and financial contributions –

Make clear developers must work on basis of no SHG being made available. Funding support should only be considered if an economic appraisal has been carried out.

Agreed. This could be clarified.

Agreed, this could be made clearer.

Agreed, It is felt that this text could be clearer.

Agreed, this would help to add clarity to the issue however due to the nature of the housing waiting lists it is difficult to obtain precise and accurate information.

The intention is to simplify this section and make section 6 less specific. It will instead work to signpost developers to the Housing Corporation standards and any future updates as and when updates are published. This should help to provide more clarity and consistency.

Agreed. The economic viability study will provide further guidance on viability with respect to Housing Corporations grants. However, PPS3 states that a S106

incorporate the other method for calculating need.

Text amended on page 18 to emphasise the affordable target is Borough-wide.

Addition made to paragraph on page 16 to include a sentence outlining that figure of 25% affordable housing should be reflected in the price developers pay for land. Summary text added to page 18 to state more clearly that the 15% is a percentage of the whole development. No change proposed.

Section 6 'Design Requirements' has been rewritten to be less specific. This reflects the fact that standards can quickly become out-of-date.

Additional text under the section on 'economics of development' (page 24), clarifies this point.

Tenure basis on which 60% developer contribution has been calculated needs to be made clearer. Amount an RSL can pay for a social rented property is dictated mainly by future rental income rather than OMV.

Section 8: Quantity – Worth flagging up RSS numbers could be liable to change; this could affect number of units delivered annually.

RENEW North Staffordshire

Section 6: Design and Layout – Some guidance on the distribution of affordable housing within the site would be useful in terms of the numbers preferred within clusters or groups of affordable units in the scheme.

Section 7: Worked example based on a 40% affordable element but is this realistic given your preference for a 25% affordable requirement.

Newcastle 50+ Forum Committee

Commuted sum payment: The 60% of market value payment should act as an incentive to include affordable housing in the developer's plans.

Section 106 Agreement: Gives clear guidance for the different interested parties to work together.

agreement should have a planning gain element. Agreed, additional text will be included. The economic viability includes a suitable methodology and levels of payment from an RSL which has resulted in a suitable OMV for units.

Agreed.

See comments above from section 106 working group **re. Tetlow King Planning's** comments on design.

This would not be worthwhile considering the Council will only ever be asking for a 25% affordable requirement.

It appears that the commuted sum payment procedure has been misunderstood. The commuted sum is a payment a developer will have to make for affordable housing offsite and not an incentive payment made to a developer.

Noted.

Text amended on page 25 to include a clear methodology and a level of developer contribution established through economic appraisals.

Note added, next to the targets on page 30, outlining that the targets may be subject to change

Appropriate reference to clusters added to Para. 3 page 20.

No change required.

No change required.

No change required.

<p>The monitoring is crucial but there must be room for compromise between partners.</p> <p>Extra Care Housing, Para.3 Page 9: This type of housing is far more expensive than could ever be considered affordable housing and unless there are substantial subsidies from Government/ NHS not ever likely to be.</p> <p>Page 19: The concept of lifetime homes which lend themselves to adaptation may lessen the need for extra care housing in the future. Very difficult to know how successful care in the community will be and the effect it has on keeping people in their original homes and so lessening the need for developments specifically for the elderly.</p> <p>Staffordshire County Council – Paul Rigby</p> <p>Supports the expectation for high standards of design, layout and landscaping for all developments.</p>	<p>Disagree. The extra care home developments within the Borough come forward with a mix of tenure to ensure extra care homes are available to everyone who requires it. As such an element of affordable housing is included within these developments.</p> <p>Noted. There will however always be a need for extra care however, as some people require that extra support available from extra care developments.</p> <p>Noted.</p> <p>Noted.</p>	<p>No change required.</p> <p>No change required.</p> <p>No change required.</p> <p>No change required.</p>
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English Heritage – Amanda Smith (18th Sept) – In view of remit, have no comments to make on the draft document at this stage.

Environment Agency - Jane Field (22nd May) – Affordable housing issues lie outside our remit, so do not wish to be fully consulted on the document. However you should be aware that if densities are to be considered as part of the SPD then Making Space for Water should also be a consideration (in order to ensure there is sufficient space on site for the use of sustainable drainage techniques in order to manage and reduce flood risk. Reference should be made to the SFRA in order to inform the allocation of housing sites. This is all in line with guidance in PPS25.

Theatres Trust – Rose Freeman (9th October) – Due to the specific nature of the Trust’s remit, they had no comment to make.