



Affordable Housing Supplementary Planning Document

Statement of Consultation

**Produced for the purposes of
Regulation 12 of the Town and County
Planning (Local Planning) (England)
Regulations 2012**

February 2022

Introduction

1. This document outlines the consultation that was undertaken in the preparation of the Affordable Housing Supplementary Planning Document (SPD).
2. It provides a summary of who was consulted on a draft of the SPD (at Table 1 below), who responded to that consultation (at Table 2 below) and the main issues arising from the responses received (at Table 3 below). It also outlines how the Borough Council has considered the main issues raised and indicates where the SPD has been modified in response to the consultation comments received or due to other relevant matters. These are summarised below and also referred to at Table 3.

Purpose of the Supplementary Planning Document

3. The purpose of the SPD is to supplement affordable housing policies contained in the Council's Local Plan and interpret pertinent National Planning Policy and Guidance within the local context. It will inform the Council's decisions when determining planning applications that are required to provide affordable housing contributions.

Publication of the draft Supplementary Planning Document

4. A draft of the Supplementary Planning Document (SPD) was consulted on between and 6 August 2021 and 17 September 2021.

Availability of consultation documents

5. In accordance with Regulations 12, 13, 35 and 36 of the Town and County Planning (Local Planning) (England) Regulations 2012, the draft SPD and supporting documents (Statement of Consultation and Screening Document for Strategic Environmental Assessment and Habitats Regulations Assessment) were made available for inspection during the consultation period at the following locations:
 - On the Council's website at: www.rushcliffe.gov.uk/planningpolicy
 - As hard copies at Rushcliffe Community Contact Centre, Fountain Court, Gordon Road, West Bridgford, NG2 5LN

Making representations on the draft Supplementary Planning Document

6. The Borough Council invited comments during the consultation period through the following methods:

- By e-mail to localdevelopment@rushcliffe.gov.uk
- By post to
Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road
West Bridgford
Nottingham
NG2 7YG

Modifications to the Supplementary Planning Document

7. In response to the main issues arising from the consultation responses received, a number of modifications have been made to the SPD where this is considered to be appropriate. The modifications are summarised below and are also referred to in Table 3. The SPD also includes additional changes that reflect emerging national policy e.g. First Homes and Entry Level Exception Sites, and minor amendments to address grammatical issues.
8. In summary, the modifications made to the SPD are:
 - Additional explanatory text on Shared Ownership affordable housing;
 - Updating the discounts required for Discount Market Sales housing, using more recent house price data and a salary multiplier of 4 x salary to determine affordability;
 - Further details on First Homes and the approach taken by the Council to their delivery;
 - Additional text on ‘pepper potting’ to address the distribution of groups of affordable housing within small/medium sites and those above 200 units; and
 - The inclusion of text on Entry-Level Exception Sites, which, according to the NPPF can deliver homes for first time buyers on the edge of villages that are not within the Green Belt.

Table 1: List of bodies directly notified as part of draft Affordable Housing SPD consultation

Accent Nene	Jigsaw Planning Limited
ACIS	John Church Planning Consultancy Ltd
Aldergate Properties Ltd	JVH Town Planning Consultants Ltd
Andrew Granger and Co	Knightwood Developments Limited
Andrew Hiorns Town Planning Limited	Landmark Planning Ltd
Aspbury Planning	Landowner Consortium (south of Orston)
Ashfield District Council	Landstack
Asra Housing Group	Langridge Homes Ltd
Astill Planning Consultants Ltd	Legal and General
Avant Homes	Leith Planning
Avison Young	Leicestershire County Council
Avison Young (on behalf of National Grid)	Longhurst
AY	Marrons Planning
Barton Willmore	Mather Jamie
Barwood Homes	Melton District Council
Barwood Land	Member of Parliament - Rushcliffe
Bidwells	Metropolitan
Bloor Homes	Midlands Rural Housing
Bloor Homes Midlands	Ministry of Housing, Communities & Local Government
BNP Paribas Real Estate	Natural England
Boyer Planning	Nathalie Dear Planning
Browne Jacobson	NCHA
Broxtowe Borough Coouncil	neighbourhood-planning.co.uk
Carter Jonas	Newark and Sherwood District Council
CBP Architects	Newton Nottingham LLP
Charnwood District Council	Nexus Planning
Chave Planning	North West Leicestershire District Council
Civil Aviation Authority	Nottingham Community HA
Clark Architectural Services	Nottinghamshire County Council
Country Land and Business Association	OSVAID (Orston & Surrounding Villages Against Inappropriate Development)
Countryside properties	Oxalis Planning
Cropwell Bishop Primary School	Parker Strategic Land Limited
Crown Estates Commissioners	Pegasus Group
Cushman & Wakefield	Penland Estates

D2N2 (Local Enterprise Partnership)	Persimmon Homes
David Wilson Homes East Midlands	Peter Tyers Associates
Davidsons Developments Ltd	Planning & Design Group (UK) Limited
Defence Infrastructure Organisation (MOD)	Parish and Town Councils
Define	Planning and Design Group (UK) Limited
Derbyshire County Council	Planning Potential
Derwent Living	Platform Housing
Development Securities PLC	Positive Homes Ltd
DevPlan	Q+A Planning Ltd
DIO Operations	Redrow Homes East Midlands Ltd
DLP Planning Ltd	Regen (on behalf of Western Power Distribution)
Duchy of Cornwall	Richard Ling & Associates
East Midlands Building Consultancy	Richborough Estates Ltd
East Midlands HA (EMH Homes)	Ridge and Partners LLP
Emery Planning	Rural Community Action Nottinghamshire
EMF Enquiries (Vodafone and 02)	RBC Councillors
Environment Agency	Sage
Erewash Borough Council	Savills UK Ltd
Fisher German LLP	Sharphill Management Services
Framework	Shouler and Son
Freeths LLP	Simon Heaton, Planning Consultant
Gedling Borough Council	SSA
Gedling Homes (now Jigsaw)	Stagfield Group Limited
Gladman Development Ltd	Stainton Planning
Grace Machin Planning & Property	Stantec (formerly Peter Brett Associates)
Greater Nottingham Planning Partnership	Stone Planning Services
GVA	Stonewater
Hallam Land Management	Strutt and Parker
Harris Lamb Property Consultants	TASCforce
Havelok Homes	Taylor Wimpey
Heaton Planning	Tetlow King Planning
Historic England	Tollerton Against Backdoor Urbanisation (TABU)
Hollins Strategic Land	Tun Tum HA
Home Builders Federation (HBF)	Turley
Homes England	Uniper UK Limited

Department of Housing, Communities and Local Government	Vale Planning Consultants
IBA Planning Ltd	W Westerman Ltd
ID Planning	Waterloo Housing Group
IM Land	West Bridgford Local Area Forum
Innes England	William Davis Ltd
Inspired Villages	Wood PLC
Jigsaw	WSP

Table 2: List of consultation respondents

AMK Planning	Radcliffe on Trent Parish Council
Davidsons Developments	Ruddington Parish Council
East Leake Parish Council	Cllr Thomas
Historic England	Cllr Walker
Natural England	Savills
Normanton on Soar	William Davis Homes

Table 3: Consultation comments – summary of main issues raised and revisions to SPD

Mod Ref	Consultee	Page / Paragraph	Comment	Response
1	AMK Planning (Adrian Kerrison)	2.13 to 2.17	<ul style="list-style-type: none"> Reconsider Discount Market Sales in respect of the appropriate discount. Should use a salary multiplier of 4.5 – 5 x salary for lower quartile (LQ) and median earners. 	<ul style="list-style-type: none"> 4 x salary multiplier will be used instead of 3 to determine discounts. 4 x salary was used within the Housing Needs Assessment to determine affordability. House prices have also been updated with the latest Land Registry data for 2021. Combined these have reduced the discounts required overall, resulting in only those on lower quartile earnings requiring a discount greater than 20% in order to purchase a lower quartile property.
2	AMK Planning (Adrian Kerrison)	2.13 to 2.17	<ul style="list-style-type: none"> It is unrealistic for LQ single earners to expect to own 2 bedroom houses as an entry point on the housing ladder – it is much more likely that LQ single earners would be seeking apartment accommodation which would be at much lower Open Market Values than the £199,000 - £275,000 range on which the study is based. 	<ul style="list-style-type: none"> This is built into the Supplementary Planning Document (SPD) which examines the likely discounts required to meet the needs of lower quartile or medium earners. As set out in the SPD, apartments of £170,000 or less would not require a greater discount than 20% for couples on lower quartile earnings. The discount will be established according to the property's value and its affordability to those on lower quartile earnings. Depending on their market value, properties less than £170,000 may not therefore require a discount greater than 20%. Text has been added to paragraph 2.25 to highlight that properties less than £170K may not require a discount greater than 20% to be affordable.
3	AMK Planning	2.13 to	<ul style="list-style-type: none"> Different types of affordable 	<ul style="list-style-type: none"> The SPD does allow for different discounts to be

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	(Adrian Kerrison)	2.17	housing should have different discounts to ensure choice. Requiring higher discounts may affect viability and the delivery of other affordable units.	applied in order to meet those on both lower quartile and medium earnings. It sets out the range of discounts required depending on the market price of the property.
4	Davidsons Developments (Marrons Planning)	General	<ul style="list-style-type: none"> In accordance with the Local Plan Regulations 2012 SPD must not contain policies. 	<ul style="list-style-type: none"> The SPD does not include policies. It assists the delivery of Policy 8 within the Core Strategy. This establishes the proportion of affordable housing required, seeks a mix of house types and sets out the tenure required (within its supporting text). Specifically, Discount Market Sales (DMS) housing text complies with National Planning Policy Framework (NPPF) and ability to set discount according to earnings and local house prices. It does not establish specific discounts, but does indicate that properties may require a discount greater than 20% in order to meet the needs of those on lower quartile earnings who are excluded from the housing market.
5	Davidsons Developments (Marrons Planning)	2.10 to 2.19	<ul style="list-style-type: none"> 'Light touch evidence' justify conclusion that discounts will vary between 30% and 50%. 	<ul style="list-style-type: none"> Disagree – the evidence and approach to establishing likely discounts mirrors the HNA that has determined affordability of housing for lower quartile earners within the Borough. Land Registry house price data and Office of National Statistics' Annual Survey of Hours and Earnings (ASHE) data are regularly used within affordability assessments.

Mod Ref	Consultee	Page / Paragraph	Comment	Response
6	Davidsons Developments (Marrons Planning)	2.17	<ul style="list-style-type: none"> • Confuses DMS and shared ownership as the same product. • Approach appears to meet the affordable housing needs of the whole housing market in Rushcliffe through the Discounted Market Sale home product alone. 	<ul style="list-style-type: none"> • SPD does not confuse Shared Ownership (SO) and DMS although both are considered 'intermediate'. SPD makes clear that intermediate is no longer included in NPPF. • SPD makes clear that DMS is not the preferred approach for meeting needs of those who wish to buy. • However additional sub section has been added, explaining shared ownership products.
7	Davidsons Developments (Marrons Planning)	2.19	<ul style="list-style-type: none"> • There is no reference to any viability assessment when considering an appropriate discount. 	<ul style="list-style-type: none"> • SPD amended and now includes reference to viability.
8	Davidsons Developments (Marrons Planning)	2.10 to 2.19	<ul style="list-style-type: none"> • As set out in NPPF (regarding First Homes) level of discount should be established through the plan-making process and supported by evidence. 	<ul style="list-style-type: none"> • SPD does not set a specific discount, it does however require that DMS meet the needs of those on lower quartile incomes. Depending on the property this <u>may</u> vary between 20% and 40%. NPPF does not require the discount to be established through the Local Plan Review.
9	Davidsons Developments (Marrons Planning)	4.3	<ul style="list-style-type: none"> • Objects to 40% and 60% occupation and completion. Not viability assessed and may not be possible due site layout, phasing and finance issues. 	<ul style="list-style-type: none"> • Additional paragraph has been added in Chapter 4 which explains that in some circumstances delivery timescales can be amended.

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10	Davidsons Developments (Marrons Planning)	4.16 to 4.18	<ul style="list-style-type: none"> • At the point of re-appraisal the development will have been built out and sold off and the developer will no longer have an interest in the land. • It is not reasonable to expect a house builder who has paid market value for a site to take a financial hit on profits at the end of the build process, when the true uplift in land value has been realised by the landowner. They are not caught by clawback. 	<ul style="list-style-type: none"> • Clawbacks have been included within previous S106 (Clifton and Bingham) and these have successfully resulted in additional contributions being payed. They have and are incorporated within S106s elsewhere. • The clawback is not applied to individual home owners. It indicates that larger sites that may take several years to develop are likely to require clawbacks. In these circumstances an outline is granted (with a reduced contribution), these then take a number of years before reserved matters are granted, and development commences. At these stages re-appraisals may take place, as recently happened during the delivery of the Bingham strategic allocation.
11	Davidsons Developments (Marrons Planning)	2.48	<ul style="list-style-type: none"> • In accordance with the para 72 of the NPPF, the SPD should be amended to make clear that entry-level exceptions sites are appropriate and that discount market sale products can be incorporated. 	<ul style="list-style-type: none"> • Additional sub-section has been included on entry-level exception sites.
12	East Leake Parish Council	General	<ul style="list-style-type: none"> • Require a minimum level of accessible housing. 	<ul style="list-style-type: none"> • The Strategic Housing Market Assessment (SHMA) model used to determine house type and tenures

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			Bungalows are in particular demand in East Leake (EL).	<p>includes the provision of bungalows. Provision of properties with higher accessibility standards is set out in Local Plan Part 2.</p> <ul style="list-style-type: none"> The Local Plan Review will establish new requirements.
13	East Leake Parish Council	General	<ul style="list-style-type: none"> Local affordable housing close to public transport – avoid locating them ‘out of sight’ at the back. 	<ul style="list-style-type: none"> Advice provided to applicants already covers this (bungalows being located close to public transport). This has been included within SPD. However pepper potting does result in some plots being located in less accessible locations.
14	East Leake Parish Council	General	<ul style="list-style-type: none"> Prioritise affordable housing in EL to current residents and those with a link to EL. Needs of Nottingham should not be met in EL. EL should be a eligible or rural exception sites. 	<ul style="list-style-type: none"> Exception sites can only be restricted to local residents. EL cannot be an exception site. The Local Plan permits, in principle, residential development within the built up area of the village. Borough wide need is met across Rushcliffe through S106 contributions.
15	East Leake Parish Council	General	<ul style="list-style-type: none"> Proportion of affordable housing should be increased to reflect the scale of development that has occurred. Data supporting the 20% is over a decade old. Can a NP differ from the SPD? 	<ul style="list-style-type: none"> The proportion of affordable housing is set out in the Local Plan and changes can only be made through LP Review. Local Plan Policy 8 is a strategic policy. NP and SPD must comply with the Local Plan strategic policy.

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16	East Leake Parish Council	2.10 to 2.19	<ul style="list-style-type: none"> • Welcome further investigation of the respective practicalities and benefits of DMS prior to a decision being made that SO is preferred. 	<ul style="list-style-type: none"> • As set out in the SPD, the reason SO is preferred is the likely discount required within DMH to meet the needs of lower quartile earners. • SPD has been amended, allowing DMS provided this discount meets the needs of those on lower quartile earnings. The need to prove that shared ownership are not wanted by an RP has been removed.
17	East Leake Parish Council	General	<ul style="list-style-type: none"> • Shared ownership could be subject to a management fee. We believe there should be transparency regarding who is paying for what, with prospective residents being informed of likely future fees and mechanisms for controlling the costs. 	<ul style="list-style-type: none"> • Additional text has been included highlighting the possibility of additional charges.
18	East Leake Parish Council	3.5	<ul style="list-style-type: none"> • Ringfenced funds should be proactively spent, ideally within the area from which the funds are generated. • Regular (annual) reporting of funds and spending. 	<ul style="list-style-type: none"> • Contributions are provided instead of on-site affordable housing, which is required to meet Borough wide need. These contributions cannot be ring fenced as they are also required to meet borough wide need. • Reports on capital spending, including funds from commuted sum payments have been written for Cabinet. The Council's Medium Term Financial Strategy (5 Years) is approved by Full Council and

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				includes information on commuted sums and its spending.
19	Historic England	General	<ul style="list-style-type: none"> No comment 	
20	Natural England	General	<ul style="list-style-type: none"> No comment 	
21	Normanton on Soar	General	<ul style="list-style-type: none"> AH should be located nearer to public transport, not at the back of developments. 	<ul style="list-style-type: none"> See response to East Leake Parish Council. Additional text has been included addressing proximity to public transport.
22	Radcliffe on Trent Parish Council	General	<ul style="list-style-type: none"> Priority must be given to people who already live in the village. 	<ul style="list-style-type: none"> See response to East Leake Parish Council.
23	Radcliffe on Trent Parish Council	General	<ul style="list-style-type: none"> Lack of affordable smaller properties for older residents who want to downsize. This has created a bottle neck. 	<ul style="list-style-type: none"> The SHMA model is used to determine individual house types and their tenures and includes the provision of smaller properties and bungalows. Policy 8 requires a mix of properties within schemes overall.
24	Radcliffe on Trent Parish Council	General	<ul style="list-style-type: none"> Support the provision of 30% AH, compared to 10% in Cotgrave. 	<ul style="list-style-type: none"> Noted
25	Radcliffe on Trent Parish Council	2.10 to 2.15	<ul style="list-style-type: none"> House prices are now out of date, given recent increases. Situation is worst. 	<ul style="list-style-type: none"> House prices have been updated using the latest Land Registry price paid data for 2021.

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26	Ruddington Parish Council	General	<ul style="list-style-type: none"> • Supportive of the draft SPD. 	<ul style="list-style-type: none"> • Noted
27	Cllr Thomas	General	<ul style="list-style-type: none"> • Draft SPD should have been brought to Growth and Development Scrutiny Group or LFD Group. 	<ul style="list-style-type: none"> • SPD was taken to LDF Group prior to consultation.
28	Cllr Thomas	1.13 – 1.17	<ul style="list-style-type: none"> • 20% AH requirement for EL is 9 years old. EL has changed dramatically during the plan period. SPD should revisit this. 	<ul style="list-style-type: none"> • Revised affordable housing contributions will be established through LP Review.
29	Cllr Thomas	1.20	<ul style="list-style-type: none"> • Ward members and parish councils should also be involved at pre-app as they have knowledge of current situation locally and any specific needs. 	<ul style="list-style-type: none"> • Pre-application is confidential. A developer can however undertake pre-app discussions with local communities in accordance with the Statement of Community Involvement.
30	Cllr Thomas	2.17	<ul style="list-style-type: none"> • Council could/should step in and act as the RP. 	<ul style="list-style-type: none"> • This is outside the scope of the SPD.
31	Cllr Thomas	2.23	<ul style="list-style-type: none"> • Can NPs include policy on First Homes that differs from the Local Plan? Can Neighbourhood Plans (NP) also include a policy on tenure mix that differs in 	<ul style="list-style-type: none"> • Provided NP does not conflict with a strategic policy it can differ from the Local Plan. Currently the LP has no policy on First Homes, therefore the NP could include a policy on this tenure. Would require evidence to support discount and other criteria (if different from national policy).

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			other respects?	
32	Cllr Thomas	2.31	<ul style="list-style-type: none"> • Support pepper potting, however affordable housing should be located closer to public transport. 	<ul style="list-style-type: none"> • See response to East Leake Parish Council. Additional text included.
33	Cllr Thomas	2.36/2.37	<ul style="list-style-type: none"> • Priority should be given at a more local level than Rushcliffe-wide. 	<ul style="list-style-type: none"> • See response to East Leake Parish Council. Priority cannot be given to local residents, unless development is on an exception site.
34	Cllr Thomas	3.5	<ul style="list-style-type: none"> • Council should be proactive, rather than just monitoring ring fenced funds. • Who is responsible for spending this money as soon as possible? • Annual reporting is required. • Funds should be spent in the area they are generated. 	<ul style="list-style-type: none"> • The Council is currently examining opportunities to spend contributions. • Strategic Housing are responsible for identifying opportunities to spend contributions. • Reports on capital spending, including funds from commuted sum payments have been written for Cabinet. The Council's Medium Term Financial Strategy (5 Years) is approved by Full Council and includes information on commuted sums and its spending. • Contributions are provided instead of on-site affordable housing, which is required to meet Borough wide need. These contributions cannot be ring fenced as they are also required to meet borough wide need.
35	Cllr Thomas	3.4	<ul style="list-style-type: none"> • Explicitly include the possibility of the council 	<ul style="list-style-type: none"> • This is not within the remit of the SPD.

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			itself building and making available homes	
36	Cllr Thomas	4.8	<ul style="list-style-type: none"> The mix should not be agreed by the council before approval of the application, i.e. without the benefit of consultation with the local community. Suggest rewording, e.g. <i>“... or, if approval has not yet been granted, an indicative mix that is agreed in writing by the Council subject to approval in the planning application with further negotiation of changes if necessary.”</i> 	<ul style="list-style-type: none"> Mix is not agreed before approval. Strategic Housing advise Planning Growth whether the mix is policy compliant, or if there is a valid justification to diverge. This advice is considered alongside responses from statutory consultees including the PC and members of the public.
37	Cllr Thomas	4.16	<ul style="list-style-type: none"> Support the clawback mechanism. 	<ul style="list-style-type: none"> Noted
38	Cllr Thomas	General	<ul style="list-style-type: none"> SPD should address management fees for open spaces and other public facilities. These can be significant. S106 should establish who pays the charges, how much and mechanism for controlling 	<ul style="list-style-type: none"> Text regarding management fees is included within sub-section on shared ownership.

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			the future cost.	
39	Cllr Thomas	General	<ul style="list-style-type: none"> Provide (within the affordable allocation) more accessible homes (bungalows etc.) along with homes that meet the relevant standards to ensure that they can be adapted to serve as lifetime homes 	<ul style="list-style-type: none"> See response to East Leake Parish Council.
40	Cllr R Walker	General	<ul style="list-style-type: none"> I understand correctly, the Strategic Housing Market Assessment (2012) underpins the provided ratios for tenure types (42% intermediate; 39% affordable rent; 19% social rent). An updated assessment has been published but not adopted through the plan process. Whilst recognising the need for this process to take its course, to what extent has the landscape changed since 2012 (new Housing Needs 	<ul style="list-style-type: none"> The ratios are set by the local plan and would need to be changed through an updated local plan, rather than through the SPD. While they are somewhat dated, the ratios are what we are currently working with and this is what the SPD has to refer to. It is envisaged that the Greater Nottingham Plan will be adopted late 2023/early 2024, at which point the SPD will be reviewed to take account of any changes to the tenure mix.

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			Assessment) and has any change been large enough to question whether the SPD should be produced with this old data?	
41	Cllr R Walker	2.10 to 2.24	<ul style="list-style-type: none"> Should the calculations for LQ and median single earners be done on 1 (and maybe 2) bedroom properties rather than on the total? 	<ul style="list-style-type: none"> The LQ and median sale prices will generally relate to smaller properties. The data RBC uses applies to all dwellings and is not split by bedroom size. Table 3 assesses affordability of single earners (LQ and median) against three property values, including LQ price, which will include smaller properties (1 and 2 bed).
42	Cllr R Walker	2.68	<ul style="list-style-type: none"> Is there an agreed ratio for calculating developer profit? 	<ul style="list-style-type: none"> It is generally accepted as 18-20%.
43	Cllr R Walker	General	<ul style="list-style-type: none"> Residents regularly state a desire for more housing options on a hyper-local level. What analysis is done/available/possible to identify need on a Parish level when individual planning applications are received/discussed? How could the SPD include opportunities to ensure that where there is an under-supply of a particular 	<ul style="list-style-type: none"> The main evidence for need at present is the Borough-wide housing needs assessment, but supplemented with more localised intelligence where available. To undertake more fine grained and localised assessment could potentially be a sizeable additional undertaking. It would need to be a corporate decision whether such evidence should be prepared, taking into account the resource and cost implications of the work. Such further evidence preparation would be undertaken separately to and outside the direct remit of the SPD.

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			housing type/size/tenure in a particular location - this can be addressed through the development?	Neighbourhood Plans offer opportunities for parish needs to be identified, provided they do not conflict with strategic policies in the Local Plan, as do Housing Need Surveys, where these have been undertaken to inform Exceptions Sites.
44	Savills (David Bainbridge)	General	<ul style="list-style-type: none"> Refer to NPPF 2021 and NPPG (including on First Homes Housing Needs of Different Groups). 	<ul style="list-style-type: none"> Agreed - text refers to updated NPPF (2021)
45	Savills (David Bainbridge)	General	<ul style="list-style-type: none"> Cannot see the affordable housing model outputs and would ask for a further explanation as to the model and implications for planning for housing development going forward. 	<ul style="list-style-type: none"> The model uses a number of data inputs and calculations (within an excel spreadsheet) to determine the mix of house types, these inputs have been identified within the SHMA (which was last updated in 2012). It is not thought necessary or practical to include the complex calculations that underpin the model. As the model identifies a need for a broad range of property types from flats/maisonettes to 4 bed houses, it cannot be used for small developments that require only a limited number of affordable homes. In these circumstances the type of affordable unit is identified according to the site, its location, and the developments layout and design.
46	Savills (David Bainbridge)	2.33	<ul style="list-style-type: none"> Do not support a rigid application of 'policy compliant' amount of 	<ul style="list-style-type: none"> Additional text states that deferral of affordable housing may be permitted where this facilitates a better distribution of affordable housing within the

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			affordable housing on each phase of development.	scheme.
47	Savills (David Bainbridge)	2.16	<ul style="list-style-type: none"> Agree with the Council's preference for intermediate tenure (paragraph 2.16), being shared ownership that can be sold from 25% to 75% discount. This will have to take into account First Homes. 	<ul style="list-style-type: none"> Agreed text on First Homes has been amended, highlighting the reduction in the proportion of other intermediate and affordable rent tenures. A breakdown of tenures where First Homes are included is set out within the First Homes section.
48	Savills (David Bainbridge)	2.20 – 2.24	<ul style="list-style-type: none"> This does not embrace First Homes and a fuller explanation for implementation of the policy is required. The First Homes scheme offers another route to home ownership and security of tenure to those who may otherwise be renting 	<ul style="list-style-type: none"> Sub-section on First Homes has been amended, with more information regarding their delivery. Including the mix of tenures, when First Homes are provided.
49	Savills (David Bainbridge)	2.28	<ul style="list-style-type: none"> Appearance and layout between market and affordable housing is not likely to be entirely indistinguishable. Affordable homes tend not to include garages and parking 	<ul style="list-style-type: none"> SPD has been amended, recognising that garages may not be provided for affordable homes.

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			arrangements may differ to market homes.	
50	Savills (David Bainbridge)	2.31	<ul style="list-style-type: none"> Not exceeding 10 affordable dwellings is not appropriate or proportional for larger housing development. Reconsider and include worked examples. Allocated strategic-scale sites in Rushcliffe Borough could be affected by this. 	<ul style="list-style-type: none"> Agreed – SPD includes an additional criterion for developments of 200+. This encourages groups of between 10 and 20 units.
51	Savills (David Bainbridge)	General	<ul style="list-style-type: none"> It is not always possible to undertake viability appraisal or specify a policy-compliant position ahead of submission of a planning application. Important details such as phasing, quantum, costs e.g. s.106 planning obligations, might not be apparent until planning application consultation responses are available for consideration. 	<ul style="list-style-type: none"> A viability appraisal will only be required where a non-policy compliant scheme is proposed and viability is claimed as the constraint. If, following consultation and negotiation, viability becomes an issue a viability appraisal will be required. Any changes in viability would be re-assessed (positive or negative) as the proposal is assessed and feedback received from consultees.
52	Savills (David Bainbridge)	2.65	<ul style="list-style-type: none"> Assessment of a viability appraisal seems quite involved when it comes to 	<ul style="list-style-type: none"> An independent assessment of viability is required in order for the LPA to be satisfied that viability is an issue. This requires external expertise. The Council

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			seeking advice and so we would ask for consideration of a more straight-forward process.	should not be required to pay for this. However the applicant is allowed to choose which assessor is used.
53	Savills (David Bainbridge)	2.65	<ul style="list-style-type: none"> The National Planning Practice Guidance (NPPG) on viability sets out key principles in understanding viability in plan-making and decision taking. It would be useful for the Draft SPD state that this has been followed, in addition to the footnote 11 reference. 	<ul style="list-style-type: none"> SPD refers to the NPPG at numerous points within the viability appraisal section of the SPD. Paragraph 2.74 has been amended to make clear that the appraisals should reflect both the NPPG and SPD, which both promote the residual land and benchmark value approach.
54	Savills (David Bainbridge)	4.1	<ul style="list-style-type: none"> Why is securing affordable housing by condition not preferred? 	<ul style="list-style-type: none"> Securing affordable housing by condition provides less certainty than those secured through S106. RBC has consistently used S106 to secure affordable housing.
55	Savills (David Bainbridge)	General	<ul style="list-style-type: none"> The 'mortgagee in possession' matter should be dealt with so that plot purchasers can be released from obligations. 	<ul style="list-style-type: none"> Agreed - Inclusion of mortgagee in possession (MiP) clause is included in paragraph 4.2.
56	William Davis Homes	General	<ul style="list-style-type: none"> Update references to NPPF (2021) 	<ul style="list-style-type: none"> Agreed – References to NPPF has been updated.

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57	William Davis Homes	1.18	<ul style="list-style-type: none"> SPDs should build on and provide guidance on policies. Any change in policy would trigger a review/update the SPD. 	<ul style="list-style-type: none"> See response to Davidsons – SPD does not establish policy.
58	William Davis Homes	DMS	<ul style="list-style-type: none"> Where has the 3 – 3.5 salary multiplier been derived from? Clarity. 	<ul style="list-style-type: none"> See response to AMK Planning. Multiplier has been increased to 4 x salary. This was used to determine affordability in the recent HMA.
59	William Davis Homes	2.16	<ul style="list-style-type: none"> Should not favour shared ownership, as there are unaffordability associated with dual rents and mortgages, hidden costs associated with ground rents and service charges, increased risks or negative equity over standard ownership and the difficulty selling to staircase up. William Davis Homes favour DMS, which can be means tested in order to structure a suitable, viable and sustainable reduction in sales price against market rates. 	<ul style="list-style-type: none"> SPD has been amended. Whilst Shared Ownership is preferred, it does not preclude Discount Market Sales housing. Additional text has been included on shared ownership. Additional text on First Homes highlights the ability to provide a range of discounts depending on house prices and earnings (see response to AMK and Davidsons above).
60	William Davis	2.23	<ul style="list-style-type: none"> First Homes can come 	<ul style="list-style-type: none"> The SPD recognises that First Homes can come

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	Homes		forward outside a LP Review. Govt states there is to be flexibility in the decision making process. Although SPD cannot apply new policy, it can request First Homes as part of a mix.	forward outside the LP Review, in accordance with national policy and the Ministerial Statement.
61	William Davis Homes	2.31	<ul style="list-style-type: none"> Limiting affordable housing to clusters of 10 is inflexible. Larger groups may be required for reasons of urban design, amenity and sustainability. RPs prefer larger groupings for ease of management. Should be determined on a case by case basis. 	<ul style="list-style-type: none"> See response to Savills – Additional text allows a larger group of 10 to 20 affordable homes within development of 200+.
62	William Davis Homes	2.33	<ul style="list-style-type: none"> Reword to provide flexibility of affordable housing delivery within each phase. There may be occasions where an increase of decrease in affordable housing in each phase is required. For example where affordable housing 	<ul style="list-style-type: none"> See response to Savills – additional text allows the deferral of affordable homes to a later phase where this facilitates a better distribution of affordable homes within the development overall.

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			are located best located close to amenities, bus stops etc.	
63	William Davis Homes	2.35	<ul style="list-style-type: none"> For clarity and to remove ambiguity the sentence should be re-worded “The Section 106 Agreement will require that, prior to development of <i>that phase</i> commencing...” 	<ul style="list-style-type: none"> Paragraph 2.43 has been amended to reflect the correct approach of including details of the location, type and tenure of each AH within the application and the submission of an affordable housing scheme prior to development commencing.
64	William Davis Homes	2.38 and 2.39	<ul style="list-style-type: none"> Welcomes the support for essential worker provision. It is suggested the SPD could look to further support the position a defined tenure spilt that supersedes the preferred “intermediate” set out in para 2.16. 	<ul style="list-style-type: none"> Additional text highlights that tenures will depend on the essential local worker, whose needs are not being met and affordability. It does not favour one preferred tenure.
65	William Davis Homes	2.70	<ul style="list-style-type: none"> Suggests the landowner premium for non-agricultural use in 10%. This figure is far too specific for such an ambiguous use; as non-agricultural would encompass uses from retail parks, disused residential property to heavily 	<ul style="list-style-type: none"> Agreed, this has been removed.

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			<p>contaminated land. Therefore, it is impossible to apply of a rigid premium against a varied risk profile of sites.</p>	
66	William Davis Homes	3.4	<ul style="list-style-type: none"> • S106 monies accrued cannot be kept in perpetuity and must be repaid and subject to indexation if not appropriately directed within a set timeframe. It is requested this is clarified by reference within the emerging SPD. 	<ul style="list-style-type: none"> • Para 3.4 has been amended. It states that <i>“It is expected that any commuted sum will be subject to repayment provisions and these will be set out within the Section 106 Agreement.”</i>
67	William Davis Homes	4.2	<ul style="list-style-type: none"> • Wording should be amended to state obligations “may” be included, as they will not be applicable to all submissions. For example, the location of Affordable Housing cannot be provided with outline applications as this is a reserved matter. Additionally, greater clarity is required in reference to “requirements to replace the 	<ul style="list-style-type: none"> • Agreed – text has been amended.

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			affordable dwellings and for subsidy recycling” as this is too ambiguous to be included in its current format.	
68	William Davis Homes	4.3	<ul style="list-style-type: none"> Triggers of 60% of open market is too soon/low and not evidence based. Council’s accepted standard is 70%. 	<ul style="list-style-type: none"> Additional paragraph outlines that there may be circumstances where commencement at 40% and completion at 60% cannot physically be achieved.
69	William Davis Homes	4.12 and 4.13	<ul style="list-style-type: none"> Template AHS is too prescriptive for all applications. Especially large outline applications which cannot include plot numbers, house types or tenure at submission stage. Over complication of outline and contrary to para 60 of the NPPF. 	<ul style="list-style-type: none"> AHSs are not required at outline, rather the S106 requires the submission of the AHS after full permission is achieved and prior to development commencing. SPD has been amended to make this clear.
70	William David Homes	4.13	<ul style="list-style-type: none"> Bullet point 4, requests details of sales price of market dwellings are offered at the S106 stage. This cannot be provided as property prices fluctuate as a development is built out. 	<ul style="list-style-type: none"> See above. AHS are submitted prior to construction. Whist prices will still fluctuate, in order to determine whether discount is appropriate, the sale price must be provided.

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71	William Davis Homes	4.16	<ul style="list-style-type: none"> Clawback should be reworded “Review Mechanism”. Clarify the size of scheme that this review applies to (i.e., an application excess of ... dwellings) over how long a period the review will be applicable. 	<ul style="list-style-type: none"> Agreed, rename review (clawback) mechanism. It will only apply to permitted schemes that do not include a policy compliant contribution due to viability. This is made clear in the SPD.