ANNEX 2

SUMMARY OF REPRESENTATIONS ON:

(1) DRAFT AFFORDABLE HOUSING SPD (JUNE 2019)
(2) DRAFT AFFORDABLE HOUSING ADVICE NOTE (JUNE 2019)

TEST VALLEY BOROUGH COUNCIL

The table below shows the responses to the statutory consultation process, and the subsequent changes proposed. Items shown in green represent the sections of the document which have had more substantial changes made to them, either to reflect the consultee feedback, or to provide greater clarity and avoid duplication of information.

DRAFT AFFORDABLE HOUSING SPD

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
Section 2 – Legislative and Policy Context					
Section 2 Para 6	TVBC Housing Development Team		The reference to "10% of the **affordable homes** planned for the site "…. Is incorrect. NPPF refers to 10% of **all** homes	Delete word "affordable"	Section 2 Para 2.6 – "on major sites at least 10% of the homes planned on the site ….."
Section 2 Para 5 – brownfield land	Michael Knappett (Bryan Jezeph Consultancy)	Incomplete sentence.	See suggested amendment below.	See below.	
Section 2 Para 5 – brownfield land	Leckford Estate (c/o Turley)	Incomplete sentence. Suggest deleting "…providing that vacant" and insert "under the provisions for Vacant Building Credit."	See suggested amendment below.	See below.	
Section 2 Para 5 – brownfield land	Hampshire Campaign to Protect Rural England	Missing text.	Finish the sentence to be consistent with paragraph 63 of the NPPF, and change "will" to "may".	Paragraph 2(5) – To encourage re-use of brownfield land, any affordable housing contribution due **may** be off-set by the amount of existing gross floorspace, provided that vacant **buildings are being reused or redeveloped.**	Section 2 Para 2.5 - – To encourage re-use of brownfield land, any affordable housing contribution due may be off-set by the amount of existing gross floorspace, provided that vacant buildings are being reused or redeveloped.
Section 3 – How Affordable Housing is Delivered in Test Valley					
TVBC Housing	Askey	Reference to "…integrated and	Oxlease Meadows was an unusual	No change.	n/a

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Services section in table		pepperpotted throughout the site…" does not seem to have been applied to the row of houses near the public car park at Oxlease Meadows, Romsey. I question whether TVBC is adhering to its own policy.	development whereby the market housing was large detached 4 and 5 bed houses. By contrast the affordable housing was a row of 5x 3-bed houses which better addressed local housing needs so there was somewhat of a contrast. On other developments, the design and integration of affordable housing is less of a contrast with market housing and in accordance with Policy COM7.		
Whole table	Hampshire Campaign to Protect Rural England	"Applicant" is used in ambiguous way as it refers to both housing applicants and planning applicants.	Agree.	In the TVBC and Planning Department rows of the table, refer to **planning** applicant. In the Help to Buy South row refer to **housing** applicant.	Section 3 – whole table – now reflects **planning** applicant and **housing** applicant
Section 4 – Housing Need in Test Valley					
Section 4 Para 2	TVBC Housing Development Team		Would be useful to update the housing register and HTB South stats	Updated figures to reflect needs data as at Feb 2020	Section 4 Para 4.2 now includes updated housing needs data.
Section 4 Paras 2 and 3 – households in need	Hampshire Campaign to Protect Rural England	The target of 200 affordable homes per year is not going to make sufficient impact on the number of households in housing need which is currently 2000. The totals on the housing register are increasing by 680 per year. The aim of the SPD should be to improve the rate of delivery of affordable housing.	The target of 200 AH per year is in the Housing Strategy 2016-19 (and the newly adopted Housing Strategy 2020-25). It is acknowledged that any affordable housing delivered in a year is insufficient to address total need in the SHMA or on the housing register, but it does emphasise priority housing needs by focusing on subsidised rented housing. PHIL Agreed – it is a realistic target and will be expressed as a minimum level of delivery in the future housing strategy 20-25.	No change	n/a

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Section 4 Paras 5-6	TVBC Housing Development Team / Planning Policy Team		Detail regarding under-occupation and LHA is not relevant. It is not a policy matter, so no need to be included in the SPD.	Remove wording as appropriate	n/a
Section 5 – What is Affordable Housing?					
Whole section	Hampshire Campaign to Protect Rural England	The term affordable housing is too coarse. The SPD and the SHMA should recognise the affordable rent at 80% of market rent leads to housing that is unaffordable for many low income households. What is affordable should be based on lower quartile band average earnings in Test Valley.	The SHMA does analyse lower quartile house prices and earnings when assessing the quantum of local housing needs. The council receives Hampshire Home Choice surveys and RPs undertake their own affordability assessments for prospective tenants. Affordable rent is the starting point for securing subsidised rent accommodation but social rent is preferred for 3 and 4 bed houses so that households are more able to afford the rent.	No change.	n/a
Whole section	TVBC Housing Development team		Need to introduce paragraph referring to new tenures introduced by government to allow scope for changes	New para introduced	Section 5 Para 5.2 – "From time to time the government introduces new affordable home ownership initiatives and the products that can be considered at the time of application may differ from those specified in this document. Any new initiatives will be given due consideration subject to the existence of detailed planning guidance and subject to the product being genuinely affordable to those with a local housing need."
Section 5 Para 6	Aster Development	If rent levels must not exceed the	Rent levels being capped to LHA in	We have subsequently reviewed	Section 5 Para 5.6 – "Affordable

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& 7 – rent levels and LHA		local housing allowance (LHA) in perpetuity in a S106 agreement, this would prevent Aster from developing new homes in Test Valley. RPs are best placed to monitor and control rents – a blanket cap in perpetuity ties the RP's hands in the long term. Aster normally caps affordable rents at LHA on first let then we assume rents will inflate in line with government policy on rent increases, but the TVBC position does not allow to do this. We have calculated figures based on no increase in rents to show what negative impact it has and are willing to share this with TVBC. The rent capping clause in the S106 is unlikely to be monitored or enforceable. This renders Aster offers on new developments uncompetitive and we will not work in local authorities where the affordable rent is capped in perpetuity, despite Aster being the LSVT in Test Valley.	perpetuity is very established and most RPs and councils operate with this. It provides consistency for all RPs and ensures that rents are affordable for households.	this position and agreed to remove reference to "in perpetuity" for the reasons stated by Aster.	Rents must not exceed 80% of the local market rent, inclusive of service charges and must not exceed the Local Housing Allowance (LHA) for the relevant property type in the relevant location."
Section 5 Para 11 – Starter Homes	Askey	It is commendable that TVBC is trying to ensure "discounted" homes are available to young people aged 23-40 but capping the dispersal price will trap young families in homes too small for a family. Young families need some	The starter homes product has been introduced by the Housing and Planning Act 2016 and will be clarified in secondary legislation. At this time, it is not a relevant housing solution to meet housing needs in Test Valley.	Starter Homes have not been progressed. A reference to Starter Homes (with their criteria being set by government, not TVBC) will remain in the document, but the position will remain that TVBC will not be	Section 5 Now Para 5.10 "The principle of Starter Homes was introduced through the Housing & Planing Act 2016 and Starter Homes have been included in the definition of Affordable Housing in the National Planning

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		profit from their starter home in order to afford a large home.		negotiating Starter Homes due to lack of national guidance and change of government direction around this type of tenure.	Policy Framework. Secondary legislation remains outstanding and the government no longer has a dedicated budget for the delivery of Starter Homes. This tenure is not, therefore, currently supported by the Council. It is neither a local nor national priority for delivery."
Section 5 Para 12 – Discount Market Sales Homes	Landspeed Homes	Whilst discount market sales homes (DMS) are included in the NPPF affordable housing definition, we believe that DMS does not offer affordable home ownership. DMS are normally sold by the developer with abbreviated nominations and qualifications which are problematic upon resale.	Discount market sale homes have been referred to in some Section 106 agreements and delivered as affordable housing as they meet local housing needs.	No change.	n/a (Now Section 5 para 5.11)
Section 5 Para 12 – Discount Market Sales Homes	Leckford Estates (c/o Turley)	"Local market levels" should be defined as there are differences in the housing markets in northern and southern Test Valley also between urban and rural areas. How often will advice on local market levels be published?	Relevant property websites are used to look at prices of similar properties in the local area compared to the property being considered for a DMS tenure. There is no need to publish this information as it is publicly available and properties are considered on a case by case basis.	Include new 2nd sentence	Section 5 Now Para 5.11 – "…..These homes must be genuinely affordable to local people, based on incomes and house prices. Proposed sales values will be assessed against similar properties in the local area."
Section 5 Para 14	TVBC Housing Development Team		Need to remove reference to Zone Agent – outdated terminology	Removed reference to Zone Agent	Section 5 now Para 5.13 – "Eligible households for first and future purchasers of Discount Market Sales homes must be registered and eligible to be on the Help to Buy Agent's register, or any successor organisation, being the register of low cost home ownership need**."**

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Section 5 Paras 17 – 19 – Private Intermediate Rented Homes eg. Rent Plus	Rentplus UK Ltd (c/o Tetlow King Planning)	The representation provides extensive background to the Rentplus model which falls within the "rent to buy" product in the NPPF definition of affordable housing *d) Other affordable routes to home ownership.* There is reference to a Housing Minister speech and a letter about Rent to Buy and the Affordable Housing Commission's report "Defining and Measuring Housing Affordability – an Alternative Approach" (June 2019). The SPD has references to intermediate tenures but this definition has been superseded and no longer appears in the NPPF definition of affordable housing except that Rent to Buy will involve a period of intermediate rent. Rent to Buy should be referred to as a stand alone tenure in line with "other affordable routes to home ownership". We welcome reference in the SPD of Rentplus which is based on the model of Rent to Buy but should be acknowledged separately from other tenures.	"Private intermediate rented" is not referred to in the NPPF. Build to Rent is in paragraph (a) of the NPPF affordable housing definition but Rent to Buy (like Rentplus UK) is in paragraph (d).	Delete references to "private intermediate rented". List different tenures in more logical order.	Section 5 Para 5.16 Rent to Buy – "Subsidised rented homes can be provided by private sector housing or by Affordable Housing Providers, including Rent to Buy. Such homes should be made available in a form which is equivalent to Affordable Rented homes provided by Affordable Housing Providers in terms of affordability. The monthly rent is capped at 80% of market rents or the Local Housing Allowance, whichever is the lowest Households must earn less than £80,000 a year and an affordability check will be carried out to ensure that the applicant can afford the rent from the start and can realistically purchase a share in the property in the future"
Section 5 Paras 18 & 19 – private intermediate rent	Trustees of the Barker Mill Estates (c/o Turley)	We welcome acknowledgement of the role of affordable private rented homes.	Noted.	No change.	n/a (Section 5 para 5.16) as above. Build to Rent is now detailed in para 5.9.
Section 5 Para 19 – private intermediate	Leckford Estates (c/o Turley)	"Schemes proposing private intermediate rent ***may*** be supported by the council." "May"	The NPPF does not refer to "private intermediate rent" but does refer to "Affordable Private Rent" under	No change. See related changes above in	As above.

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rent		should be replaced by "will" as the NPPF is clear that private rented accommodation falls within the definition of Affordable Housing.	section a) Affordable Housing for Rent. Intermediate rent is in section d) Other Affordable Routes to Home Ownership when referring to rent to buy. Even though the terminologies are included in the NPPF affordable housing definition, councils are not bound to include them all – an applicant must demonstrate that the tenure or housing product is affordable to those in local housing need, and hence relevant in Test Valley.	response to Rentplus UK.	
Section 5 Para 21 – shared ownership rent level	Aster Development	This refers to rent being charged on the unsold equity not exceeding 2.5% but page 6 of the Advice Note refers to no more than 2.5%. The normal standard is 2.75%.	Agreed.	amend "2.5%" to read "2.75%".	Section 5 now Para 5.18 – "…. Rent will then be charged upon the unsold equity and shall not exceed **2.75%** of the value as specified by Homes England**. "**
Section 5 Paras 24 & 25 – shared equity	Landspeed Homes	The definition of shared equity is too concise and should be expanded to read: • Shared equity enables an eligible purchaser to purchase an equity share in their home via a conventional mortgage. The equity share shall always be equal to the level set on the initial disposal (or such subsequent value following staircasing where the staircased interest is less than 100% of the open market value of the home) at any given time and its monetary value may therefore	Paragraph 24 provides a useful summary of the shared equity product and it is not necessary to expand any further.	No change.	Section 5 Para 5.21-5.23 – (wording is sufficient to cover main points)

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		increase or decrease in accordance with fluctuations in the open market value. • The mechanism for delivery will be secured through the S106. • A shared equity unit for sale shall be sold to a person or persons who are unable to afford market housing. The initial equity share shall be sold at up to a maximum 75% of the open market value. The approved body shall retain a beneficial interest in the unsold share which shall be secured by a legal charge thereon to protect the discount. Subsequent sales (resales) will seek initially to secure purchasers with a local connection (or such arrangements that accord with the specific provisions of the S106) and will be retained as affordable housing. • Unless a purchaser has staircased to 100%, then the affordable housing provider will continue to retain a mortgage or charge on the property for the remaining equity and there is no rent or interest charged on this share. Purchasers are fully entitled to staircase to 100%	Disagree. The 25% equity charge should be retained by the AHP to ensure the dwelling remains affordable, and would not be transferred to the new purchaser. The equity loan (eg. 75%) **would** be transferred to the new purchaser who would be a Qualifying Person nominated by Housing. However, an amendment is required. Agree. There is a similar sentence in the Share Ownership section at paragraph 5(22).	Paragraph 5(25) - Upon resale if the purchaser has not staircased to 100% ownership, the equity loan is ~~re~~paid to the ~~Affordable Housing Provider~~ **new purchaser** in relation to the percentage share retained.	Section 5 Para 5.22 - . "Upon resale, if the purchaser has not staircased to 100% ownership, the equity loan is paid to the new purchaser in relation to the percentage share retained. For instance, if 75% share purchased and 25% equity charge to the Affordable Housing Providers, 25% of the resale value at the time of the sale, would be payable to the Affordable Housing Provider to maintain the equity charge"

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		ownership. Para 25 is incorrect? The equity loan should be transferred to the new purchaser, not the affordable housing provider. It should be amended to read: Upon resale, if the purchaser has not staircased to 100% ownership, the equity charge held by the affordable housing provider in relation to the percentage share retained is transferred to the new purchaser. For instance, if share purchased upon resale is 75% then the 25% equity charge, held by the affordable housing provider, will be transferred to the new purchaser by way of mortgage or legal charge to continue to protect the discount and ensure that the shared equity unit remains affordable until such time as an owner/purchaser has staircased to 100% ownership at which point the approved housing provider shall discharge the equity charge held and all previous related restrictions will cease. An additional point to include is that nominations are via Help to Buy South or its successor as the zone agent (as stated in the definition of shared ownership).		At the end of paragraph add **"Nominations are via Help to Buy South or its successor as the Zone Agent."** Now 5.23	Section 5 Para 5.23 – "Nominations are via the Help to Buy Agent or its successor…"
Section 5 Paras	TVBC Housing		These are types of affordable	Split these out from tenures	Section 5 Para 5.24-5.39 Listed as

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26-44	Development Team		housing to meet specific customer needs, not tenures as set out in the NPPF. Need to list them separately so as not to confuse them with tenures. Also there is no need to repeat legislation around self/custom build.		forms of housing rather than tenures.
Section 5 Para 27 – Specialist and age-targeted housing	Leckford Estates (c/o Turley)	Delete paragraph 27. Reference to such accommodation generally falling within Use Class C3 is over-simplified and the subsequent bullet points are unduly prescriptive.	Disagree. TVBC recognises that some age-targeted accommodation can be a hybrid of Use Class C2 and C3, but paragraph 27 is attempting to clarify proposals which clearly fall within C3 and hence would be subject to an affordable housing provision.	No change.	Now Section 5 Para 5.25
Section 5 Para 29 – Retirement Dwellings	Askey	Reference is made to retirement housing needing to contribute to affordable housing – the council should negotiate prudently to obtain generous contributions off-site.	Annex 1 of the SPD refers to the method for calculating financial contributions in lieu of on-site affordable housing. This has been used at various times, including for older persons' accommodation, to ensure a realistic commuted sum is generated.	No change to text, but moved to different section for clarity.	Now Section 6 Para 6.11
Section 5 Para 31 – extra care housing	Hampshire Campaign to Protect Rural England	"To meet the growing needs of an older population…" Is the population growing or the average needs of individuals that is growing? Suggest replacing it with "To meet the needs of a growing older population…"	Suggest an amendment to clarify.	Amend to **"**To meet the needs of an increasing proportion of older people**…"**	Section 5 Para 5.27 –" To meet the needs of an increasing proportion of older people within the local population, and to provide a choice of care for those with particular care requirements, Extra Care housing schemes can provide an appropriate way of meeting those requirements in schemes that meet a range of different levels of need."
Section 5 Para 35 – exceptional	Hampshire Campaign to Protect Rural	It states that Policy COM7 seeks on-site provision except in exceptional	The policy does not mention exceptional circumstances. The	Text to be moved to the Policy COM7 section for clarity. Need	Now Section 7 Para 7.1

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circumstances	England	circumstances, but the policy makes no mention of exceptional circumstances. It should.	Revised Local Plan supporting text para 5.105 did refer to "The preferred option is for provision to be made on-site. In some circumstances the Council will consider an equivalent off site contribution where justified." However this text was deleted in the COM7 Planning Advice Note (July 2016). Nevertheless, the new AH SPD clarifies the position that affordable housing should be provided on-site unless it falls within one of the financial contribution categories or if exceptional circumstances justify it.	to remove reference to "extra care housing" at the end of the sentence as this applies to all developments, not just extra care. Wording to otherwise remain as existing.	
Section 5 Paras 38-40 – self build and custom build	Michael Knappett (Bryan Jezeph Consultancy)	It is not clear how self-build or custom build plots could be considered a form affordable housing, after allowing for plot acquisition costs, build costs and financing.	In paragraph 61 of the NPPF, footnote 26 suggests that self and custom build properties could provide market or affordable housing. But the appeal decision dated 12 November 2019 for land at Oakcutts, Stockbridge was dismissed and paragraph 12 says "Furthermore, self-building …has little bearing on whether a dwelling can or cannot be considered to constitute affordable housing." **PHIL - I would be minded to delete this section altogether (paras 5 (38 – 44). Surely there would be no AHP appetite for self build?** **Any self/custom build proposals for a site over AH policy thresholds would still be expected to deliver**	Include a section on self/custom build to specify AH requirements where policy threshold is triggered. To be included within Policy COM7 section. Also include a section on what self/custom build is, in the list of different types of housing.	Section 6 Para 6.6 (policy position) "A proposal for self build or custom build housing, whether on its own or as part of a larger traditional housing scheme, will be required to provide a proportion of affordable housing and to comply with Policy COM7. Self build or custom build housing may be considered as affordable housing if it is demonstrated that local open market house prices and rents are unaffordable. Section 5 Para 5.38 - Where self build plots are considered feasible for affordable housing, planning obligations in a Section 106 agreement will control occupancy, re-sale and maximum sale or rent prices that can be charged. Where

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			AH – either on site or through financial contribution.		self build housing is not feasible for affordable housing, a commuted sum in lieu of on-site affordable housing will be secured in accordance with method outlined in Annex 1."
Section 6 – When is Affordable Housing Required On-site?					
Section 6 Para 1 – Policy COM7	Michael Knappett (Bryan Jezeph Consultancy)	The contents page should make it clear that there is an original version of Policy COM7 (page 13) and a revised version on page 14.	Agree.	Remove old policies as these make the document very confusing to read.	Contents page amended as appropriate. Now only includes new proposed policy position.
Section 6 – whole section	TVBC Housing Development Team / Planning Policy Team		We recommend removing the previous versions of COM7 in light of the fact that there has been a further amendment in the NPPF since the consultation took place, which would require 3 different versions to be shown. Consultation feedback indicated some confusion with 2 versions.	Remove old versions of COM7 to avoid confusion.	Section 6 Paras 6.1-6.2 – Policy COM7 wording now updated to reflect NPPF changes
Section 6 Paras 1 to 7 – Policy COM7 old and revised	Leckford Estates (c/o Turley)	The revised wording to Policy COM7 to take account of national policy guidance and the small sites exemption, at paragraph 7, is welcomed. However, there is no evidence in the SPD to demonstrate a case for seeking financial contributions on smaller sites and therefore no affordable housing should be sought from schemes of 10 dwellings or less.	Policy COM7 does not seek affordable housing from sites of 10 dwellings or less in non-designated rural areas. NPPF paragraph 63 says that in designated rural areas, affordable housing can be sought from site thresholds below that of 10 dwellings in the "major development" definition. It suggests that the site threshold could be 5 dwellings or fewer, above which affordable housing can be sought. So Policy COM7 includes a section	Need to address recent NPPF changes.	Section 6 Paras 6.1-6.2 Policy COM7 wording now updated to reflect NPPF changes

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			for sites of 6-9 dwellings. The policy is also in accordance with PPG "Planning Obligations" paragraph 023 which says that in designated rural areas, local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Financial contributions in lieu of on-site affordable housing have been secured on sites of less than 10 dwellings at Crofton, Awbridge; Hyde Farm, Broughton; and Home Farm, Wellow.		
Section 6 Para 2 – housing in rural areas	Hampshire Campaign to Protect Rural England	This should refer to the latest NPPG para 023 which states that councils can set their own threshold in rural areas. We believe that rural sites accommodating 3 or more dwellings would be compatible with the TVBC aim of 34% affordable (200 out of 588). There is no need for the proportion of affordable housing to be reduced with development size in rural areas.	At present Policy COM7 does not seek affordable housing or a financial contribution on sites of 5 or less dwellings, and any change to the policy will be done through a review of the local plan.	No change.	n/a
Section 6 Para 7 – Revised wording of Policy COM7	Michael Knappett (Bryan Jezeph Consultancy)	1000sqm threshold – this was deleted from the NPPG in March 2019 and Policy COM7 is in conflict with national guidance.	The 1000m^2 threshold in the NPPF and PPG "Planning Obligations" only refers to non-residential proposals, and such government guidance carries more weight than the local plan policy.	Need to update wording to reflect NPPF changes.	Section 6 Paras 6.1-6.2 Policy COM7 wording now updated to reflect NPPF changes

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		0.5ha threshold – this is contrary to para 63 of the NPPF and "major development" definition, and Policy COM7 should be amended. Should footnote 14 refer to Annex 3, not Annex 8?	**LEGAL – can "1000m2 etc" be striked out of Policy COM7 in the SPD?** Disagree. Both the NPPF "major development" definition and PPG "Planning Obligations" paragraph 023 refer to a site area threshold of 0.5ha. Agreed.	Amend footnote 14 to refer to Annex 3 (Designated Rural Areas Map).	Now Annex 2
Section 6 Para 7 – Revised wording of Policy COM7	Landspeed Homes	With regard to the bullets on "10 dwellings…" and "6-9 dwellings…" they should also allow for on-site provision of affordable housing if this is viable and can be delivered by an affordable housing provider. This would allow both options to be considered (financial contribution or on-site provision).	Affordable housing has been successfully delivered on a site of 10 dwellings or less at Kents Orchard. Policy COM7 refers to a financial contribution equivalent to up to 20% of dwellings to be affordable, but this does not preclude on-site provision if this is viable and feasible.	No change.	n/a (para 6.2 – policy COM7 wording)
Section 6 Para 7 – Revised wording of Policy COM7	Hampshire Campaign to Protect Rural England	Affordable housing in rural areas should not be replaced with a financial contribution. Affordable housing is needed in a particular	Affordable housing has been successfully delivered on a site of 10 dwellings or less at Kents Orchard. Policy COM7 refers to a financial	No change	n/a (para 6.2 Policy COM7 wording)

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		rural community to provide local accommodation for those in need and Policy COM7 should be revised.	contribution equivalent to up to 20% of dwellings to be affordable, but this does not preclude on-site provision if this is viable and feasible.		
Section 6 Paras 10 & 13 – legal agreements	Michael Knappett (Bryan Jezeph Consultancy)	Some paragraph numbering is wrong. Need clarity that both S106 and unilateral undertakings can secure affordable housing, not just legal agreements.	Agree. A legal agreement or unilateral undertaking are both pursuant to Section 106 of the Town and Country Planning Act 1990. Both are relevant to securing the delivery of affordable housing, as paragraph 6 (10) refers.	Amend as necessary. No change.	Numbering corrected. Section 6 para 6.7" As stated in Policy COM7, the Council will seek to secure affordable housing, or a financial contribution for off-site provision, via a S106 agreement or a Unilateral Undertaking (UU)." Section 6 para 6.10 "The precise mix and tenure for provision on site will be specified in the S106 agreement or UU". Definitions of S106 and UU also in Glossary
Section 6 Para 15 – starting point to secure affordable housing	Leckford Estates (c/o Turley)	Reference to the 3rd bullet – 70% affordable or social rented housing. Later in the SPD at Section 9, paragraph 2 there is reference to two thirds, so the council's starting point should be 67% not 70%.	The reference to "two thirds" in Section 9, paragraph 2 is to the district totals in the SHMA table for affordable rent + social rent = 66.3%. The following paragraph 3 then says a tenure split of "…70% social/affordable rent is a starting point in negotiating…". 70% is a rounded figure and used in negotiations.	No change to text, but move to more logical place.	Now Section 6 para 6.8

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Section 6 Para 15 – starting point to secure affordable housing	Trustees of the Barker Mill Estates (c/o Turley)	We welcome the starting points for negotiation but suggest that the target of 70% social rented should be replaced with "a predominance of social rented" to provide greater flexibility.	The 3rd bullet refers to "at least 70% affordable or social rented housing" and not just social. TVBC is considering options for tenure splits for the rented element (affordable rent/social rent).	No change but move to more local place.	Now section 6 para 6.8
Section 6 Paras 24 and 25 – sub-division of sites	Trustees of the Barker Mill Estates (c/o Turley)	These need further explanation as it is not clear how this can be achieved and does not provide sufficient certainty.	Paragraphs 24 and 25 are considered to sufficiently highlight issues of sub-division of sites to circumvent the affordable housing threshold, which should be avoided.	No change.	Now Section 6 paras 6.21 and 6.22
Section 7 – Rural Affordable Housing – NOW SECTION 8					
Section 7 Para 7.5	TVBC Housing Development Team	.	HARAH no longer in operation, so wording needs to be changed to reflect new arrangements	Updated wording to reflect new arrangements	Now Section 8 – Para 8.7 – "To deliver rural exception affordable housing sites, the Council works in partnership with other organisations and partnerships as appropriate."
Section 7 Para 8 – rural exception sites	Leckford Estates (c/o Turley)	We welcome the recognition that a proportion of market homes may be allowed to enable the delivery of affordable homes without grant funding.	Noted.	No change to text.	Now Section 8 Para 8.9
Section 7 Para 8 – rural exception sites	Hampshire Campaign to Protect Rural England	It states that a proportion of market housing could be allowed on rural exception sites but doesn't state what an acceptable proportion could be. It should be very low because otherwise (1) landowners will increase the asking price of land; (2) it would be contrary to the "overarching objective to provide affordable homes to meet local needs" in section 8, paragraph 5; (3) it would raise concerns in the local community about the main purpose	Noted. Having a fixed proportion of market housing would be inappropriate as each development would be considered on its merits. Only if necessary, could a **small** proportion of market homes be considered to enable the delivery of affordable housing in a rural area.	No change.	Now Section 8 Para 8.9

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		of the development being to provide homes for those in housing need.			
Section 7 Para 14 – shared ownership equity share restriction to 80% in DPAs	Aster Development	The requirement for restricted staircasing in DPAs creates problems with mortgage availability and hence sales. DPAs are a statutory instrument and a requirement for us when obtaining grant funding.	Noted. The Housing (Right to Enfranchisement) (Designated Protected Areas) (England) Order 2009 designates protected areas in many Test Valley parishes. Affordable housing providers are therefore required, amongst other matters, to include in their shared ownership leases (1) a maximum 80% equity share and (2) a buy-back clause to the AHP if equity share is 100%. However, there needs to be further clarification on whether or not the restrictions can be applied if the S106 does not specify it.	Need to amend wording to allow for some flexibility in light of the lack of definitive guidance.	Section 8 Para 8.6 …."Some Shared ownership homes **may** be restricted to 80% ownership by the purchaser unless the Affordable Housing Provider has included the rural buy back clause in the lease."
Section 9 – Tenure and Mix of Affordable Housing **NOW SECTION 10**					
Section 9 – WHOLE SECTION	TVBC Housing Development Team		This section is now quite different from the original consultation version, but all of the detail is covered in relevant sections to make it a more logical read. However, we did remove some of the detail in response to consultation feedback so as to enable more flexibility to be applied on a site by site basis.		Now Section 10
Section 9 Para 1 – tenure split	Hampshire Campaign to Protect Rural England	We support the tenure breakdown needed in the affordable housing provision.	Noted.	No change to proposals	Now Section 10 Para 10.3
Section 9 Para 1	TVBC Housing Development team		Need to allow for changes in need as a result of any future SHMA during the lifetime of the SPD	Include additional sentence to futureproof	Section 10 Para 10.1 –" The estimated level of Housing Need (per annum) identified in the Strategic Housing Market

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
					Assessment (SHMA) (2014) by type of affordable housing is shown in the table below**.1f this is superseded by a subsequent SHMA or other assessment of local housing need, the latest figures will be relevant"**
Section 9 Para 9 – dwelling mix	Leckford Estates (c/o Turley)	It is not an appropriate policy approach to require a mix of dwelling styles, type and size and a mixture of flats and houses on each site. On smaller sites this could compromise viability. Meeting identified housing needs should be district-wide and there should be flexibility within individual sites based on local needs.	Not all sites will be able to provide the full range of dwelling types as this will depend on site size, layout and other planning considerations. Did consider adding a table showing potential scenarios for for guidance, but decided not to include as it could be too prescriptive.	Review wording to ensure there can be some flexibility	Now covered under Section 10 Para 10.4 and Section 11 – Prior Consultation.
Section 9 Para 15 – dwelling types	Leckford Estates (c/o Turley)	Re. no more than 40% of the affordable homes should be flats. It is not an appropriate policy approach to require a mix of dwelling styles, type and size and a mixture of flats and houses on each site. On smaller sites this could compromise viability. Meeting identified housing needs should be district-wide and there should be flexibility within individual sites based on local needs.	Noted. The 40% limit on flats would be applied flexibility and be subject to site size, layout and other planning considerations.	Review wording to ensure there can be some flexibility	As above
Section 9 Para 19 – discount market homes	Michael Knappett (Bryan Jezeph Consultancy)	There is no explanation why discount market homes will only be considered on large developments of over 100 dwellings.	We should retain some flexibility to allow Discount Market Homes on smaller sites.	We have now agreed to remove that reference to sites of over 100 dwellings to enable more flexibility. There may be circumstances on a smaller site with viability issues where we	Section 5 paras 5.11 and 5.12 – no longer any reference to sites over 100 dwellings.

[1] *Source: Figure 7.24, page 106, TVBC SHMA 2014*

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
				may wish to negotiate discount market homes instead of having to accept less units or a financial contribution.	
Section 9 Para 19 – discount market homes	Leckford Estates (c/o Turley)	This paragraph should be deleted as no reason is given for this approach of over 100 affordable homes.	As above.	As above.	As above
Section 9 Para 19 – discount market housing	Southern Planning Practice	Discount market homes should be considered on all development sites. The NPPF encourages small and medium housebuilders who do not benefit from economies of scale and where margins of profitability are less. Allowing discount market housing on smaller sites would ensure that affordable housing is less onerous.	As above.	As above.	As above
Section 9 – Prior Consultation NOW SECTION 11				NEW SECTION ADDED WHICH NOW CONDENSES THE INFORMATION THAT WAS IN THE SEPARATE ADVICE NOTE	
Section 10 – Development Viability NOW SECTION 13					
Whole section	TVBC Housing Development Team		This section is now quite different from the original consultation version, but has been condensed, with all relevant information still included. The only consultation response received was with regards to supporting the requirement for viability assessments to be made publicly available. That reference remains.		Now Section 13
Whole section	Hampshire Campaign to Protect Rural England	This section fails to reflect PPG which states that the role of viability assessment is primarily at the plan	PPG "Viability" paragraph 006 says that where up-to-date policies have set out the contributions expected	No change to policy approach	Now Section 13 Paras 13.1-13.14

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
		making stage. Developers have ample opportunity to debate the affordable housing percentage at various stages of the local plan process. Poor decisions made concerning the price paid for land should not deprive the district of much needed affordable homes.	from development, planning applications that fully comply with them should be assumed to be viable. So the emphasis is indeed on plan making but the PPG also makes references to viability assessments for planning applications, should that be necessary. PPG "Viability" paragraph 002 states that the (excessive) price paid for land is not a relevant justification for failing to accord with relevant local plan policies. The Dixon Searle Affordable Housing Viability Update (2012) informed the commuted sum calculation at Annex 1 of the SPD and also Policy COM7 also. Therefore the expectation is that developments should be viable in normal market conditions unless there are exceptional site specific costs.		
Section 10 Para 8 – circumstances for a viability assessment	Leckford Estates (c/o Turley)	The approach is too rigid as there will be circumstances where an alternative tenure split or an off-site contribution will be justified outside of viability considerations.	The 2nd bullet refers to departing from the 30% intermediate/70% rent *where this has not been agreed for other reasons.* If this was stated in paragraph 10(8) it would address non-viability scenarios.	In the 2nd bullet, move the phrase "where this has not been agreed for other reasons" to a more appropriate place.	Section 13 Para 13.8 –" There may be circumstances where the costs of developing a site may affect its value. **Where this has not been agreed for other reasons,** the Council expects a viability assessment to be submitted with a planning application in the following circumstances"
Section 10 Para 9 – costs and values in a	Leckford Estates (c/o Turley)	At the time of submitting a planning application, actual costs and values will not be available.	PPG "Viability" refers to benchmark land value and existing use value for the purpose of viability	Viability section reviewed, but no change to policy approach.	Section 13.

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
viability assessment			assessments. Even if actual costs are not known for a planning application, it is important that the most up-to-date and relevant costs are used to determine viability.		
Section 10 Para 13 – viability appraisal information	Rentplus UK Ltd (c/o Tetlow King Planning)	6th bullet – reference is made to Rentplus and Rent to Buy but it is the same model. 6th bullet – "…assumed to be sold…after a period of 5 years…" This should be amended as not all households will be able to afford to purchase after 5 years. Rentplus offer tenants an agreed route to ownership taking into account their financial situation.	The NPPF affordable housing definition refers to "rent to buy" not rent plus. Rent Plus UK is one of a number of commercial operators which deliver a rent to buy product. The rent to buy model normally has a planned route to ownership after periods of 5, 10, 15 or 20 years after first occupation. An appropriate amendment is suggested.	Delete reference to "Rent Plus" throughout the SPD. Paragraph 10(13), 6th bullet – "…assumed to be sold on a shared ownership basis after a period of 5 years **or later period to be agreed**…"	Deleted reference to Rent Plus throughout the document
Section 10 Para 21 – viability review and surplus profit	Leckford Estates (c/o Turley)	The basis for the proposed profit split of 60% to the developer and 40% to the council is not specified and is unjustified. The principle of viability review is agreed but the mechanism for dealing with profit uplift requires clarification.	Some clarity on the 60/40 split would be useful. What was agreed in previous reviews? Would 50/50 be a good approach? See also PPG "Viability" para 009 about review mechanisms being necessary to strengthen a LA's ability to seek compliance with relevant policies over the lifetime of the project (rather than a tool to protect a return to the developer).	Wording has been changed to be more flexible – see para 13.13	Section 13 Para 13.14 "Where permission is granted for a scheme that departs from the policies in the RLP, a review will be applied to the scheme to ensure that any uplift in values are captured to enable the delivery of the maximum amount of affordable housing later in the development process. The review will assess the changes to the gross development value and build costs. If surplus profit is generated over and above

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			PHIL		the returns necessary for the scheme to be deemed viable, a review will apply."
Section 10 Para 23 – marginal or negative viability	Leckford Estates (c/o Turley)	The paragraph suggests that the council will not support proposals which have marginal or negative viability. No justification is given for this approach which is inconsistent with national policy guidance. Not all development proposals are pursued for financial profit.	It is highly unlikely that a development would proceed if it was not financially viable. However, where viability is marginal, the assessment should scrutinise all viability inputs to ensure that affordable housing provision and other planning obligations are feasible and deliverable.	Viability section reviewed, but no change to policy approach.	See new Section 13.
Section 10 Para 31 – disclosure of viability assessments	Leckford Estates (c/o Turley)	This refers to viability appraisals generally being published. Reviews of viability assessments undertaken by or on behalf of the council should be subject to the same transparency requirements as the viability appraisals themselves, and published.	Agree. The NPPF (para 57) requires viability assessments to be made publicly available.	Reflect requirements of NPPF	Section 13 Para 13.10 – "As set out in the NPPF (para 57), all viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, **and should be made publicly available unless there is clear justification for it to remain confidential.** "
Section 11 – Grant Funding NOW SECTION 16					
Section 11 Para 11.1 – Introduce reference to nil subsidy being the starting point. TVBC Housing Development Team Section 11 Para 11.4 – as above				Added reference to nil subsidy	Section 16 Para 16.1 – "The starting point for delivery of affordable housing should be on a nil subsidy basis. The Homes England Affordable Housing Programme can, however, provide grant funding to Affordable Housing Providers to develop affordable homes in certain circumstances" .

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
Section 11 Para 11.7 – remove reference to Grants Policy in Annex 2. TVBC Housing Development Team				Remove reference and remove Annex 2 from document. Grants Policy needs to be reviewed and updated. If we include it as part of the SPD it could become out of date, so recommend that it is kept as a separate document, with a link to the webpage where the policy can be found. This enables the council to update the policy without the need to wait for the whole SPD to be updated. Grant cannot be exclusively reserved for AHP's who are already active in the borough, so reference to that needs to be updated.	Section 16 Para 16.1 – 16.5
Section 12 – Vacant Building Credit**. NOW SECTION 9, WITH DETAIL PROVIDED AS ANNEX 3**					There is limited national guidance on VBC which has resulted in different interpretations being applied. In the event of any appeal or case law which suggests a specific approach should be taken, we need to be able to update the guidance note without it being contained within the main body of the SPD.
Section 12 Para 3 – criteria for applying VBC	Leckford Estates (c/o Turley)	The requirement to demonstrate that every reasonable attempt has been made to secure an occupier for a minimum period of 6 months has no basis in national policy – buildings may simply have become obsolete from their original use.	This criterion is considered reasonable in order to ensure that a building has not been made vacant for the sole purposes of redevelopment. Six months of marketing is realistic and would also be used when assessing the potential loss of employment sites under Policy LE10 or the potential	No change to detail. Include detail as Annex rather than in main body of document.	See Annex 3

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
			loss of community facilities under Policy COM14.		
Section 12 Para 6 – vacant building credit	Michael Knappett (Bryan Jezeph Consultancy)	Which NPPG threshold is being referred to?	This should be reference to the site size thresholds in Policy COM7, in order to avoid artificial subdivision of sites and circumvention of the affordable housing requirement.	Separate Annex to address detail	Annex 3 Para 23.5 – "The Council will determine on a case by case basis whether a building is vacant or abandoned. Outline planning applications may present challenges in quantifying whether the vacant building credit will be applicable as the actual number of dwelling or size of dwellings may be determined during Reserved Matters applications. The council will scrutinise planning applications to ensure that sites are not artificially subdivided to avoid the site size thresholds in Policy COM7."
Section 13 – Layout and Design NOW SECTION 12					
Whole section	Hampshire Campaign to Protect Rural England	Layout - in order to facilitate rural exception sites, the SPD should take a relaxed view about road access – insisting on 5.4m wide road plus pavements and visibility splays rules out many potential sites with restricted access or close to town centres. Meeting normal road widths and layouts could be out of character with the rest of the village and unnecessary for small developments.	Rural exception sites should meet the Hampshire County Council Highway requirements as with any other development. Normal planning considerations would be taken into account including "being in keeping with the character of the area" particularly in conservation areas. The local plan does not have a policy about energy efficiency but this will be addressed in its review. Part L of the Building Regulations needs to be complied with and is regularly updated in terms of the	No change to approach.	Now Section 12

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		Design – the SPD should emphasise the need for high thermal efficiency in affordable housing. A good example is the Stirling Prize-winning Goldsmith Street scheme which uses Passivhaus technology – low heating costs are a large part of making housing affordable for low income households.	conservation of fuel and power in new dwellings. Some affordable housing providers build to the former Code for Sustainable Homes Level 4 and above, using Passivhaus technology or similar.		
Section 13 Paras 2, 3 and 4 – clustering and phasing	Ashfield Partnership (c/o WYG)	We welcome the flexibility to negotiate the final affordable housing mix. We also agree that affordable homes should be indistinguishable from market housing and that concentrations of affordable homes of the same tenure or size should be avoided. It is positive that the council recognises that some grouping of affordable homes will have practical construction and management benefits but the rigidity of "clusters of no more than 10" without any caveat about further discussion and agreement, is unreasonable. The figure appears arbitrary and could hinder the ability of a developer to achieve a well-planned and designed scheme especially on larger sites such as **Whitenap** (local plan allocation for 1300 dwellings).	Support is noted. A range of 10-20 dwellings in a cluster may give more flexibility, together with a caveat of "unless otherwise agreed by the council". **PHIL – I think they have a point. Agree with the change? East Anton had clusters of 15 dwellings. Bracknell Forest always referred to clusters of 10-20 dwellings in S106s.**	Paragraph 13(2) – amend the text to allow some flexibility Agreed to change to allow clusters of no more than 10 dwellings unless otherwise agreed by the council in writing. This enables flexibility where appropriate without setting a maximum figure which developers may then aim for.	Now Section 12 Paras 12.3-12.6 Section 12 Para 12.3 – "Affordable housing should be fully integrated into a development and provided in clusters of no more than 10 dwellings, unless otherwise agreed by the council in writing, and having regard to the number of affordable homes, mix of dwelling types and layout of the proposal. The affordable homes should also be indistinguishable from the market housing. "

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		What is the evidence which underpins the figure of 10 dwellings? Other councils apply a more generous figure of up to 15 dwellings. Apply the 10 dwelling blanket limit could preclude affordable housing being delivered in locations where higher densities are justified eg. larger blocks of affordable flats in local centres or key nodal points. The limit of 10 dwellings to a cluster at Whitenap would generate 52 separate clusters for 520 affordable dwellings (40% of 1300). This could compromise the Partnership's placemaking principles and is unlikely to be attractive to an Registered Provider. An upper limit of 15 dwellings would give a more manageable 35 clusters at Whitenap. Reference to "**unless otherwise agreed by the council**" would give more flexibility as would a **cascade approach** ie. larger developments could have large clusters taking into account site specific and other considerations. There is no definition or understanding of clustering but it should reflect site specific and other considerations. But we would not advocate illustrative examples as this would prevent consideration of a detailed layout on a site-by-site			

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		basis.			
Section 13 Para 9	TVBC Housing Development Team		Need to set a target for a percentage of adapted homes as a point of negotiation Text is quoting out of date Building Regs	Add a preference for securing 10% of adapted homes on sites delivering 10 or more affordable homes. This is not a policy requirement at this stage and will only be referred to as the Council's aim. This helps to ensure that properties are suitably adapted to meet identified needs. Update Building regs references.	Section 12 Para 12.11 "On developments of 10 or more affordable homes the Council would aim to achieve at least 10% of Social/Affordable Rented homes to be delivered as adaptable homes that can meet the changing needs of occupants, built to Building Regulations Part M4 (Category 2) Revised Edition 2015 or successor regulations. Where Category 2 dwellings are to be provided the Council will review the housing needs and negotiate with the developer over the provision of level access showers where there is a demonstrable need"
Section 14 – Mechanism for Securing Affordable Housing SECTION NOW REMOVED					
Whole section	TVBC Housing Development Team		This section has been removed and all detail has been amalgamated into more relevant sections.		
	Michael Knappett (Bryan Jezeph Consultancy)	Need clarity that both S106 and unilateral undertakings can secure affordable housing, not just legal agreements.	A legal agreement or unilateral undertaking are both pursuant to Section 106 of the Town and Country Planning Act 1990. Both are relevant to securing the delivery of affordable housing, as paragraph 14(1) refers.	This is already covered in Section 6. Delete this section as it is repeating earlier information.	Section 6 Para 6.7 "As stated in Policy COM7, the Council will seek to secure affordable housing, or a financial contribution for off-site provision, via a S106 agreement or a Unilateral Undertaking (UU)."
Section 15 – Delivery and Management NOW SECTION 17					
Section 15 Para 1	TVBC Housing Development Team		Need to remove reference to Starter Homes as these are not a tenure we can support	Remove reference to Starter Homes	n/a

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
Section 15 Para 2 - shared ownership equity share restriction to 80% in DPAs	Aster Development	The requirement for restricted staircasing in DPAs creates problems with mortgage availability and hence sales. DPAs are a statutory instrument and a requirement for us when obtaining grant funding.	Noted. The Housing (Right to Enfranchisement) (Designated Protected Areas) (England) Order 2009 designates protected areas in many Test Valley parishes. Affordable housing providers are therefore required, amongst other matters, to include in their shared ownership leases (1) a maximum 80% equity share and (2) a buy-back clause to the AHP if equity share is 100%. (same point as section 7(14) above)	Remove from this section as already covered in earlier section	n/a
Section 16 – Negotiating Affordable Housing Contributions					
Whole section - section has been removed and all detail has been amalgamated into more relevant sections.					
Section 18 – Off Site Delivery					
Whole section - Some of the text has been changed to provide clarity.					
Section 20 – Glossary					
Need additional references added as necessary, including Custom/Self Build, Hampshire Homes Hub, and removal of Zone Agent				Updated	See new Section 20 - Glossary
Section 21 – Annexe 1					
Calculating contributions – whole section	Leckford Estates (c/o Turley)	Application of a standardised RLV to each of the council's CIL charging zones is a blunt tool and will not recognise the differences between areas within the same CIL charging zone in terms of costs and values. The methodology should be adapted to allow for local variations to be accepted.	The 4 CIL zones each have different residual land value (RLV) percentages to reflect local variations and are based on recent figures in the Calculation Methodology for Financial Contributions (Dixon Searle, 2016). To suggest alternative figures in different areas within the CIL zones would not be feasible.	No change to approach	Information condensed from SPD and Advice Note, and new Annex 1 now written.
Section 21 Para 1	TVBC Housing		The wording suggests that the	Change wording to reflect that	"Section 21 (Annex 1) Para 21.1 -

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
	Development Team		methodology only applies to sites of 6-9 dwellings, whereas it would also apply to any other site where a financial contribution is applicable.	the methodology is the same for all contributions	This section sets out how financial contributions will be calculated for developments of 6 - 9 dwellings **and for any other commuted sum in lieu of on-site affordable housing"**
General Comments					
	Highways England	No comments – as there would be no impact on the safe and efficient operation of the strategic road network ie. the A34, A303, M3 and M27.	Noted	No change.	n/a
	Jenny Hopkins	No comments directly on the draft SPD but she highlights issues affecting rural villages such as Appleshaw and Redenham where large expensive houses have been granted planning permission and built, instead of smaller more affordable homes which could be occupied by local people both young and old. If the public subsidy process is made easier to access and developers have access to rural agencies, this could help to keep rural communities alive instead of large houses being built to maximise profit.	Whilst TVBC cannot influence individual landowners and the private housing market, it can enable Rural Exception Sites under Policy COM8 based on local housing needs surveys which would determine the appropriate dwelling types and tenures, and be normally 100% affordable housing. Policy COM9 encourages community led developments which would also address local housing needs in their respective areas.	No change.	n/a
	Historic England	No comments on the draft SPD but advises that the council's conservation staff should be closely involved in preparation of the local	Noted.	No change.	n/a

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		plan.			
	Askey	It would have been helpful to have a link to the draft SPD on the same page as the announcement it is available for comment. Publicity could have been clearer. It is pleasing to see that TVBC has delivered 733 affordable homes in the last 3 years. There are so many retirement flats on the market but very few properties for younger people. The market economy is aiming at down-sizers yet there are 2000 people living in unsuitable housing across all tenures in TVBC. Various comments on common areas on housing estates.	Noted. **PHIL - this needs looking at by someone – but not related to the AH SPD.**		n/a
	Leckford Estates (c/o Turley)	We welcome the document which will replace the out-dated 2008 SPD but it is not wholly consistent with the NPPF 2019 and in some areas is unduly prescriptive. We welcome the recognition of difficulties in securing affordable housing in rural areas and that market housing may be needed to cross-subsidise the delivery of affordable housing. The draft SPD identifies a wide range of affordable housing types which will assist landowners, developers and	Noted. Other points made by Leckford Estates have been addressed above.	Recent amendments now reflect NPPF 2019	

Section/Para on Consultation Document	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change	New Version (incl new para numbering)
		communities in determining the best form of provision and which is most viable.			
Other Comments					
	Natural England	No comment. The topic of the SPD does not appear to relate to our interests to any significant extent. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.	Noted.	No change.	n/a

Draft Affordable Housing Advice Note

The contents of the draft Affordable Housing Advice Note have now been incorporated into the main SPD. The Advice Note contained some duplication of information and consultation responses indicated that it was causing some confusion.

Section/Para	Representor Name/Organisation	Summary of Representation	TVBC Comment	Change
Section 2 – Affordable Housing Provision in Test Valley				
Para 2.2 – affordable housing rent	Aster Development	If rent levels must not exceed the local housing allowance (LHA) in perpetuity in a S106 agreement, this would prevent Aster from developing new homes in Test Valley. RPs are best placed to monitor and control rents – a blanket cap in perpetuity ties the RP's hands in the long term. Aster normally caps affordable rents at LHA on first let then we assume rents will inflate in line with government policy on rent increases, but the TVBC position does not allow to do this.	Same point Aster made on the SPD (section 5, para 6) – see comments above. See main document	Section 5 Para 5.6 of new draft SPD - removes reference to "in perpetuity".
Section 4 – Dwelling Mix (Sizes and Types)				
Dwelling	Aster Development	There is no mention of semi-detached houses. These are	There is already reference to	Section 10 Para 10.4(iii) of new

types		as acceptable as detached and terraced housing and should be referred to also.	semi-detached houses in the main SPD – Section 10 Para 10.4(iii)	draft SPD refers to this.
Para 8 – Preferred Affordable Housing Providers	Landspeed Homes	As Landspeed Homes is approved by TVBC and has delivered 3 schemes, we should be included in the list of affordable housing providers in the Affordable Housing Advice Note.	Fair point? Why did TVBC engage Landspeed x3 if they were not a preferred RP? **PHIL – Non registered AHP depends on terms of the partnership?** Preferred partner list (Aster, VIVID, Radian, Sovereign, English Rural) but also work with Landspeed & Merlion (non-registered providers).	No longer producing a separate Advice Note. Main SPD document will refer to Affordable Housing Providers who develop in TVBC area, but no list of partners to be included as the detail is likely to change.