

Affordable Housing SPD - Response to informal consultation

Respondent	Representation	Response
Housing Corporation	The purpose of the SPD is clear	Noted
	The aims are clear and no additional aims are needed	Noted
	The process of delivering affordable housing is clear	Noted
	The definitions in the document are clear	Noted
	It is important that the guidance on size and type of affordable housing in Annex C agrees with the findings of the of the HMNAS. They need to meet Housing Corporation minimum standards if grant is required, but also have to fit Housing Corporation regional/national targets	Annex C has been amended to make clear that the indicative mix is based on the findings of the HMNAS.
	The guidance on supported housing is very useful	Noted
	The policy on qualifying sites is clear. It is good that it is made clear that site-specific issues will be assessed on a case-by-case basis.	Noted

	The guidance on Rural Exception Sites is clear	Noted
	The guidance Housing Quality Indicators and Space Standards is helpful, especially to partners looking to develop with Housing Corporation grant, because they would need to comply with those standards at the time of bidding.	Noted
	The guidance on Funding is helpful. The emphasis on the use of the Economic Appraisal Toolkit is welcome. The G=Housing Corporation confirms a that it will only fund additionality. Also under para 6.2.14 regular market engagement will be a more formal “in year” bid arrangement.	Noted – the SPD has been amended to reflect the fact that regular market engagement will be a more formal “in year” bid arrangement.
	The section on Allocations and Lettings is helpful. It is important to have a policy which creates sustainable communities.	Noted
	The section on Delivery, including the model condition and Section 106 Agreement is helpful.	Noted
	The Chapter on off-site provision is helpful, particularly Section 9.1 . The Housing corporation only funds Purchase and Repairs in exceptional circumstances as defined in the Regional Housing Strategy, so the reference to “no grant aid” in para 9.1.5 is welcome.	Noted

SEERA	No comment	Noted
Kent County Council	<p>The need for affordable housing sits alongside other claims for funding physical and community infrastructure including those most directly related to the needs generated by the development of the site. The totality of these community infrastructure claims may impact on the viability and sustainability of the development. The Affordable Housing SPD addresses but one facet of developer contributions. It would benefit from a more holistic approach and it would therefore be better if guidance could be produced on development contributions generally.</p>	<p>The Council regards the provision of affordable housing as a “top slice” from all housing development above the defined thresholds. It is accepted that certain infrastructure is required to make the physical development of such sites practicable and that this is necessary expenditure to ensure the delivery of the affordable housing.</p> <p>The provision, prioritisation and funding of other social and community infrastructure is a matter of judgment that can best be made on a site-by-site basis depending on the location, nature and viability of development. In this respect, regard is paid to the County Council’s Guide to Development Contributions and the Council’s own requirements for open space and other facilities. A general SPD on Development Contributions would not assist the balance of judgements that can only be made on a site-specific basis.</p>
	<p>The draft SPD is clearly presented and comprehensive. Its aims and purposes are generally clear as are the definitions. However, what is not clear is exactly how much affordable housing is expected to be delivered and how this relates to the overall level of provision of housing in the Borough and recent levels of delivery.</p>	<p>The HMNAS concluded that the annual requirement for affordable housing was 554 units which is 123% of the total annual requirement of 450 dwellings in the RSS (as recommended to be changed). Any requirement for affordable housing at or above 100% of all provision is clearly unrealistic, particularly bearing in mind that only a proportion of new housing</p>

		<p>comes from sites above the thresholds. The Council has therefore set no specific target, since its objective is to achieve the highest reasonable level of provision on every eligible site having regard to the criteria set out in para 6.3.26 of the Core Strategy. It is agreed that it would be helpful to include a reference to this fact in the SPD,</p>
	<p>Para 2.1.4 Does the target for equity share under shared ownership relate to 25% or 50% equity share or does it lie within a range of 25%-50%?</p>	<p>It relates to a range and the document should be amended to make this clear.</p>
	<p>A target based upon number of units may produce a bias in favour of small units whereas para 3.2.2 refers to maximising family sized accommodation. Might it not be better to apply the target on the basis of habitable rooms, bedspaces or perhaps net residential floorspace?</p>	<p>The Council is aware that London authorities use this approach. However, floor area based models are complex and time consuming to negotiate. The current approach adopted by the Borough Council has proved successful in securing a range of house types. The draft SPD seeks to add greater weight to the case for family size accommodation through providing a clear strategic steer and guidance over the size of units required to meet identified needs.</p>
	<p>Although the factors taken into account in arriving at the indicative affordable housing mix in Annex C are stated, the specific derivation of the proportions and/or weightings applied to the factors could be explained more fully. For example, do they derive from Housing Register data? Will the proportions in Annex C constitute part of the monitoring framework?</p>	<p>Annex C has been amended to make clear that the indicative mix is based on the findings of the HMNAS.</p>

<p>Supported and Sheltered Housing KCC welcomes the recognition given to the need for extra care and lifetime housing, but would it not be helpful to give some quantitative indication of need for this type of housing? The definitions exclude people with learning difficulties. KCC's "Active Lives" policy seeks to support such people to lead independent lives.</p>	<p>Work to quantify need is ongoing with the county council and will be incorporated in the revised Housing Strategy 2008-2011. Accommodation for people with a learning disability is being addressed for the Kent PFI initiative and other RSL schemes currently for development.</p> <p>The document has been amended to include learning disability and to set out more clearly the Council's strategic priorities for supported housing.</p>
<p>Under Section 5 or Annex G it might be helpful to include the website address for "Kent Design".</p>	<p>This can usefully be included</p>
<p>Funding: Under Section 6 (or in an Annex) a worked example of explaining how the grant funding mechanism operates would be helpful. Para 6.2.8 might be elaborated to indicate what development costs would be considered normal or conversely abnormal in the context of site appraisals.</p>	<p>It is agreed that the inclusion of a worked example would be helpful. By their very nature abnormal costs tend to be site specific and therefore unpredictable but it is agreed that examples of such costs could usefully be included in para 6.2.10.</p>
<p>Off-site provision Consideration of alternatives to on-site provision should not give rise to inadvertent financial incentives for off-site provision. In order to maintain parity there should be a higher number of off-site affordable units as the initial development would be accommodating 100% market housing. Offsite provision should maintain the 60:40 ratio overall.</p>	<p>It is agreed that there should not be a financial incentive to deliver affordable housing off-site. Paragraph 9.1.7 has been amended to make clear that no overall loss of units should arise from delivering affordable housing on an alternative site.</p>

<p>Aylesford Parish Council</p>	<p>The purpose of the document t is not entirely clear. Whilst the terms of Policy CP17 are clear the SPD goes on to outline various acceptable variations and exceptions to the policy. For example it appears to state that in rural areas 40% of new housing should be affordable irrespective of whether an existing settlement is predominantly rented accommodation. Similarly it appears that provided the percentage is achieved it does not have to be built in the same settlement area. This could lead to all social housing being grouped together creating ghettos.</p>	<p>The purpose of document is clearly set out in para 1.1.2. It is to add detail to the way in which Policy CP17 is to be interpreted and implemented. It does not change the Core Policy, neither does it identify exceptions to policy but it does explain that it is only the start point for negotiation</p> <p>The policy seeks to provide both social rented and intermediate housing with the actual mix on any particular site being determined by local circumstances. The policy does allow for off-site provision in exceptional circumstances. In the case of Exception Sites in rural areas the mix would be determined by a local housing needs assessment.</p>
	<p>If affordable housing is to be provided as a fixed percentage then the existing levels of affordable housing must be included in any calculation. Thus in some areas there may be no need to permit anything other than social housing and in other nothing but market housing.</p>	<p>The Council's policy is that on all sites above the thresholds 40% of dwellings should be affordable. The start point is that 70% of the affordable element should be social rented housing but this may be varied depending on local circumstances. In exceptional cases provision may be made off-site. In the case of Rural Exception sites the level of affordable housing would be 100% with the mix being determined by the results of a Local Housing Needs Study.</p>
	<p>The document should unambiguously state that all affordable housing should be fully integrated with private housing to ensure ghettos are not created.</p>	<p>It is agreed that this should be the case and the document has been amended accordingly.</p>

The aims are clearly identified.	Noted
The process is not clearly explained – there is too much jargon and unnecessary repetition.	The process is clearly explained in Section 1.3. A process diagram is to be included.
The definitions are clear.	Noted
In Annex C the number of single bedroom shared ownership units appears to be too high.	The findings are based on the independent Housing and Market Needs Assessment study 2005. The Council is also working with parishes to develop a programme of rural housing needs surveys which will provide greater detail on the precise housing needs in rural parts of the borough.
The guidance on supported and sheltered housing is clear.	Noted
The objectives relating to Qualifying Sites are clear but the means of achieving them are not.	Some amendments are proposed to Section 4.2 to aid clarification.
The section on Rural Exception sites is clear.	Noted
The sections on funding, allocations and lettings and	A worked example has been included to aid

	delivery are helpful. The section on off-site provision is helpful but not entirely clear.	clarification. The section on off-site provision has been revised to make it clearer.
Southern Housing Group	Annex A – Definitions The definition of Shared Ownership is incomplete without a reference to affordability. Under Discounted Sale a reference is made to an income maximum of £27,500. The same reference should be made within the Shared Ownership definition. In addition annual housing costs (mortgage and rent) should not exceed a third of gross salary (as per the Government’s guidance on intermediate tenure)	Agree. The definition has been amended accordingly.
	Annex C – Housing Mix The reference to 2 beds would be more exact if occupancy level was also specified (eg 3 or 4 persons). 3 person occupancy would almost certainly imply flats rather than houses.	Reference to indicative occupancy levels has been included
	Annex I – Dwelling Type The floor area range for the 2 bed/4person type falls below the Housing Corporation’s HQI standard (d) which is 67 -75 sq m.	The indicative floor areas at Annex I make a distinction between houses and flats. A larger floor area is proposed for 2 bedroom houses
	Section 6 Funding Southern Housing welcome the adoption of the principle embodied in the SPD that serviced land for affordable housing should be transferred to a RSL at nil value, However, the SPD also states that there is an expectation that there will not be any grant available from	The Borough Council considered setting indicative social housing grant (SHG) levels. However, this was not consistent with Government policy advocated by the Housing Corporation (HC) which makes clear that SHG should only be sought where it provides

	<p>the Housing Corporation for affordable housing achieved through planning gain .</p> <p>This is incompatible with the objective of securing 70% of affordable housing for rent. The income from target rents will generate a value that is 30-48% of Open Market Residential value. This would imply that the developer contribution would have to exceed nil land value and that an additional subsidy will be required. This would have a very high impact on land value, particularly when combined with other contributions, to the extent that in many “change of use” redevelopments residential use will not be a viable option and the delivery of housing will be undermined.</p> <p>The Council’s interpretation of the Housing Corporation’s position on grant is incorrect. In fact, a large proportion of the Corporations programme funds planning gain schemes. The more critical point is the level of grant required to achieve the desired quota and tenure preference and that a mechanism is in place should grant not be available which allows a cascade to a lower quota or tenure profile.</p> <p>The SPD describes the position on grant as dependent on proving additionality and non-viability. In practice this introduces a high degree of uncertainty into the development and land buying process. It does not take account of the competitive nature and practicalities of purchasing land. Clearer guidance and more certainty is required to reduce the risk of over valuation and abortive marketing.</p>	<p>‘additional’ units.</p> <p>Paragraph 6.2.2 has been amended to make clear that while NIL land value may not guarantee a grant free scheme it is the starting point for negotiations.</p> <p>The approach adopted in this SPD has been endorsed by the Housing Corporation</p> <p>The Borough Council acknowledges the degree of uncertainty for RSLs when bidding for schemes. However, the SPD reflects the Government’s approach to grant funding for affordable housing. .</p>
	<p>An alternative approach is suggested:</p>	

	<ul style="list-style-type: none"> • The 40% quota, tenure split and dwelling mix is the start point; • The price that an affordable housing provider RSL will generate for the quota can be determined as either nil land value or a figure provided by a RSL; • If the RSL provides a price this will be based on either: <ul style="list-style-type: none"> (a) advice from the Borough Council on the grant level assumption (the expectation is that this would be consistent but would be adjusted on an annual basis); or (b) the RSL provides the price based on nil grant for 100% shared ownership. The assumption would then be that grant is available to achieve the level of 70% social rented accommodation. <p>The RSL would then assume this level of grant was available and make a judgement about how realistic it was .</p> <ul style="list-style-type: none"> • The Section 106 would include a cascade should grant not be available. <p>The above methodology is simple and will achieve certainty. It will also facilitate some competition between RSLs and creates an incentive to maximise the value of the affordable housing.</p>	<p>Refer to above comments on the Government's preferred approach to grant funding which is consistent with this SPD.</p>
	<p>Southern Housing support the references in para 8.1.5 relating to the sale of completed units to a Housing</p>	<p>Noted</p>

	Association and in Para 8.1.8 relating to car parking.	
Hyde Housing Association	The purpose and aims of the SPD are clear. No additional aims are needed.	Noted
	The process is clear but the need for early discussions with Housing Officers about housing mix should be stressed.	Agree – this to be emphasised more clearly in document.
	Agree with the guidance in Annex C on size, but believe a distinction should be made between flats and houses as the highest need is for houses for rent.	Agree – an amendment has been made.
	The level of Lifetime Homes should be set at 50%.	Noted. The document has been amended at para 3.6.2.
	The reference to Wheelchair Housing should be further developed possibly with a target proportion on larger schemes. Is there sufficient evidence on the level of need?	This section has been revised to express more clearly what is expected of wheelchair designed housing. Only existing evidence is from HMNAS which SPD reflects. A target of at least 10% has been set for Lifetime Homes standard.
	The need for Keyworker Housing should be more specific.	A West Kent study has previously been conducted which highlighted the need to provide housing opportunities for ‘essential workers’ in the region. The needs of Key Workers are in effect ‘ring fenced’

		through the Government's national housing programmes. The SPD already seeks to place greater emphasis on the unmet needs of essential workers.
	The guidance on Qualifying Sites and the Rural Exception Sites Policy is clear.	Noted
	The guidance on design in Annex H is helpful but design standards are not solely to meet Housing Corporation grant requirements but are generally required by RSLs to ensure good quality accommodation. Otherwise in situations where no grant is available a developer may argue that the standards can be reduced.	Noted. Annex H has been amended to reflect this point.
	In the view of the RSL a cluster of 40 flats is too large. 20 is a more sustainable level.	The section has been amended to make it clear that Affordable housing should be fully integrated with the private market housing but without being specific about minimum or maximum cluster sizes because this will depend on the size, location and nature of the site and of the affordable housing mix.
	Sometimes affordable housing is of a different appearance to the market housing because of the RSLs higher standards.	Noted
	Annex I – Floor areas are agreed apart from 2 bed/4person	Agree, and an amendment has been made

	accommodation which should be a minimum of 67 sq m.	accordingly
	The section on Funding is helpful, but it should be noted that that it is almost impossible to ensure a grant free scheme based upon nil land value developer contributions alone. There also has to be some mechanism to control the build costs.	Paragraph 6.2.2 has been amended to make clear that while NIL land value may not guarantee a grant free scheme it is the starting point for negotiations.
	The section on Allocations and Lettings is helpful but should there not be some mention of the “Choice Based Lettings Scheme”.	Agreed. Reference to Choice Based Lettings is now included at para 7.1.1.
	The section on Delivery is helpful but the cap on service charges is too high. A more affordable level for estate charges would be around 15% of rent plus charges for specialist items such as lifts.	Agree. The document has been amended to emphasise the Borough Council’s expectation that service charges will be kept to a minimum to ensure affordability for occupants.
	The section on off-site provision is helpful but there could usefully be some reference to the timing of delivery of off-site affordable housing linked to the development of the main site.	Agree – the document has been amended accordingly at para 9.1.5.
Tetlow King on behalf of Trenport	The purpose of the SPD is not clear. The stated purpose is to “inform applicants in more detail of what the Council will expect to secure in terms of affordable housing on new developments”. This is not entirely consistent with either the	Most other respondents consider the purpose off the SPD to be clear. Its purpose is to provide more detail than is appropriate in the Core Strategy of what the Council will require.

	<p>Core Strategy or the Inspector's Report. Both these documents see the key purpose of the SPD as a means of monitoring the provision of affordable housing and reviewing the level to be sought.</p>	<p>Para 6.3.30 of the Core Strategy is referring to two quite separate SPDs. The Annual Monitoring Reports will review the delivery of affordable housing and the HMNAS will be reviewed on a periodic basis as part of a Strategic Housing Market Assessment. It will only be if the conclusion is that the percentage requirement should be reduced below 40% that a SPD will be prepared. This is most unlikely in the foreseeable future. The current SPD is that referred to in the final sentence of para 6.3.30 which says that "further advice on the provision of affordable housing will likewise be contained in an Affordable Housing SPD".</p>
	<p>It is stated that the SPD amplifies Core Policy CP17, but it also addresses Core Policy CP19 relating to Rural Exception Sites.</p>	<p>The reference in the SPD to Core Policy CP19 was intended to be ancillary to the main thrust of the document. However, on reflection, it would probably be better if it was made clear in the introduction that the SPD relates both to Policy CP17 and CP19.</p>
	<p>The SPD should explain that paras 6.3.23 to 6.3.37 take precedence over anything contained in the SPD.</p>	<p>This is not necessary. There is nothing in the SPD that is at variance with what is said in either of these paragraphs.</p>
	<p>The lack of clarity and purpose manifests itself throughout the document. There is unnecessary duplication of the Core Strategy and unnecessary verbiage spread throughout the</p>	<p>This is not a view reflected by most other respondents. The Housing Corporation support the document as written.</p>

	document.	
	<p>The aims of the document are insufficiently focused:</p> <ul style="list-style-type: none"> • The first aim should be expanded to include “<i>and to create sustainable, inclusive, mixed communities in both urban and rural areas</i>”. • The second aim should focus more on providing “<i>high quality</i>” homes • The third aim should focus more on achieving the seamless integration of affordable housing within schemes without prejudicing total housing delivery throughout the Borough 	<p>The aims of the SPD should focus on its specific purpose which is to deliver affordable housing. The suggested changes to the first aim are too high level for the Affordable Housing SPD.</p> <p>Reference to “high quality” rather than “appropriate design standards” now included which better reflects the content of Section 5 of the document.</p> <p>An additional aim has been included to refer to tenure-blind integration of affordable housing within private housing developments.</p>
	<p>The format as described in para 1.2.1 is flawed. There is no useful distinction between the two parts of the document. Both contain elements which are likely to change in the very near future.</p>	<p>The distinction between the two parts is important because it is designed to enable the latter part to be regularly updated without the need for the full statutory process of SPD production to be followed.</p>
	<p>The process as described in para 1.3.1 is generally welcomed subject to the following suggestions:</p> <ul style="list-style-type: none"> • Applicants should be “encouraged” (not required) to submit an Affordable Housing Statement in support of an application. 	<p>An Affordable Housing Statement is a local validation requirement that that we must be submitted with an application for development of a qualifying site to</p>

	<ul style="list-style-type: none"> • The preparation of the independent development appraisal should be a collaborative process in line with para 11 of PPS3. • A simple flow chart setting out the various stages of the consideration of affordable housing within the planning application process would assist interpretation of the whole document. 	<p>enable the Council even to start processing the application. So it is correct to say that it is a “requirement”</p> <p>Agreed that the development appraisal should be a collaborative process, and amendment is proposed to this effect, but it also needs to be seen to be independent. Ultimately the Council will have to assess it and decide the weight to be given to it.</p> <p>It is agreed that this would be helpful and a flow chart has been included.</p>
	<p>Section 3 – Definitions There is much in this section that duplicates the Core Strategy and/or PPS3 (para 2.1.1 and 2.1.2 in particular).</p>	<p>It was considered helpful for the document to be as self-contained as possible to avoid the need for continual cross-referencing to other documents.</p>
	<p>The juxtaposition of the terms “<i>low cost home ownership</i>” (para 2.1.4) and “<i>low cost market housing</i>” (para 2.1.5) which have entirely different meanings is likely to cause confusion. The former term has no basis in PPS3 and no definition in AnnexA. It should be substituted by reference to “<i>intermediate forms of home ownership</i>”.</p>	<p>Paragraph 2.1.4 has been amended to be consistent with the Government’s definitions.</p>

	<p>Annex A is very useful in setting out definitions but the lack of correlation with the definitions in Section 2 is disappointing. In all cases where a term is defined in Annex A there should be a cross-reference to it.</p>	<p>The above amendments should address this criticism. It is not agreed that it would be helpful to cross-refer to Annex A every time a term is referred to. This would make the document unreadable.</p>
	<p>There is insufficient reference to Strategic Housing Market Assessment as a collaborative and interactive process. The process by which affordable housing needs will be reviewed and monitored is not transparent. Indeed there is no explicit reference to Annex C of PPS3 and its associated Practice Guidance. The dangerous assumption appears to be that the Study carried out by DCA will remain fit for purpose for the foreseeable future.</p>	<p>This is not a matter for the SPD. The SPD is intended to amplify the requirements of the already adopted Core Strategy. What is being referred to by Tetlow King is the process of reviewing the Core Strategy. This will be done if the results of monitoring and a Strategic Housing Market Assessment indicate that a review of the Core Strategy policy is necessary. If the resulting requirements are less onerous then it is suggested in para 6.3.30 of the Core Strategy that this can be implemented through SPD. Any more onerous requirement would need to go through the full statutory plan review process.</p>
	<p>Concerned at the inference that the Council is seeking to transfer some of its statutory housing duties to developers, in particular the reference in para 3.2.4 to housing “<i>reasonable preference</i>” groups.</p>	<p>The Council has a legal duty to meet the accommodation needs of certain groups. It is therefore felt appropriate to emphasise the accommodation needs of these groups in planning for new affordable housing</p>
	<p>It is helpful to have an up-to-date indicative affordable housing mix for the three sub-areas set out in Annex C. It is not, however, fully transparent as to what factors have been taken into consideration in deriving these figures. Some of</p>	<p>Annex C has been amended to make clear the adjustments made to the indicative mix arising from the HMNAS 2005.</p>

	<p>the variations between sub-areas are very marked and warrant explanation. For example why should 60% of shared ownership dwellings in the Medway G have 3 bedrooms or more?</p>	
	<p>The interface between supported housing and affordable housing as set out in Sections 3.3 and 3.5 is far from clear. Furthermore some of this housing is likely to fall within Use Class C2 and therefore beyond the scope of the RSS housing requirements.</p>	<p>The provision of supported affordable housing in the context of the SPD does not form User Class C2. It is consistent with Government guidance and that of the Housing Corporation in planning to meet the needs of not only those with a general housing need but those with a supported housing need.</p>
	<p>Section 5 – Qualifying Sites.</p> <ul style="list-style-type: none"> • The text regarding mixed communities (paras 4.1.1 and 4.1.2) is superfluous in this section. • The terminology regarding “<i>site suitability</i>” in para 4.2.1 is not as clear as it should be. The listed criteria should actually be defined as relating to assessing the quantum and type of affordable housing to be provided and whether it should be on or off-site. The premise being that all sites are <i>pima facie</i> “suitable” to make an affordable housing contribution. • The criteria are generally supported but it would be 	<p>It is agreed that these two paragraphs are superfluous in this section of the document and they have been deleted</p> <p>Amendments are proposed to para 4.2.1 to aid clarification</p> <p>The references to development costs have been</p>

	<p>helpful to separate out abnormal or particular costs inherent to the site from the achievement of other potentially competing planning objectives as two separate criteria.</p> <ul style="list-style-type: none"> The wording of para 4.2.2 is unclear. "<i>An element</i>", as referred to in the first sentence, could relate to any proportion or type of housing. The last sentence should make it clear that it is both the amount and the type which might be varied. In the context of the wording of Policy CP17 and what is said in para 4.2.1 it is stretching credulity to state that less than the sought affordable housing provision will only be agreed in "<i>very exceptional circumstances</i>". 	<p>deleted from this paragraph because they duplicate what is in para 6.2.10. A cross-reference has been made</p> <p>Some amendments have been made to para 4.2.2 in the light of these comments.</p>
	<p>Trenport support the maximum clusters proposed and the need for physical integration referred to in paras 5.1.1 and 5.1.2.</p>	<p>Noted, but in the light of other comments received the document has been amended to remove all reference to specific sizes of clusters.</p>
	<p>A clearer distinction should be drawn between development standards which the Council is seeking to apply to all affordable housing schemes and those which apply only to Housing Corporation funded schemes (paras 5.1.5 to 5.1.9).</p>	<p>Paragraph 5.1.7 has been amended to make clearer the application of the Housing Corporation's design standards.</p>
	<p>It should be made clear that the internal floor areas set out in para 5.1.9 and Annex I are "indicative" and not absolute minimum "requirements".</p>	<p>The document now makes this clear in both locations.</p>

	<p>Section 6 – Funding - The introductory paragraphs as written (Paras 6.1.1 to 6.1.3) are confusing and meaningless.</p>	<p>A flow chart has been included to make clearer the process for taking schemes forward.</p>
	<p>The basis for the Council's approach to grant funding (paras 6.2.1 to 6.2.5) is accepted. However, it is evident that <i>“circumstances where it can be proven that the absence of funding or future commitment to grant funding”</i> are likely to be common rather than <i>“the exception”</i>. It is unclear what is meant by <i>“any alternative arrangement”</i>.</p>	<p>The document has been amended at para 6.2.6 to make clearer the Council's position.</p>
	<p>Trenport is not aware that any generic viability assessment has been undertaken to demonstrate that 40% affordable housing (with a 70:30 split in favour of social rented accommodation) is deliverable without grant. Even if it had there will be inevitably be fluctuations in the local housing market over time and variations across the Borough.</p>	<p>None has been undertaken and for this reason the document seeks site-specific appraisals on a case-by- case basis.</p>
	<p>The SPD is not sufficiently explicit that the Council will enter into cascade agreements to cater for the eventuality of funding shortfalls.</p>	<p>Paragraph 6.2.5 and 6.2.6 have been amended to make clear the Council's position.</p>
	<p>The general approach towards assessing viability (paras 6.2.7 to 6.2.12) is supported but could be improved as follows:</p>	

	<ul style="list-style-type: none"> • The assumptions should be agreed at the beginning of the process in a collaborative way (para 6.2.7); • Both the scale and nature of any abnormal development costs as well as how unusual or predictable they might be are relevant ((para 6.2.8)) 	<p>It is agreed that the independent assessment should be carried out as a collaborative on the basis of open-book information provided by the developer, but it is important that the assessment is seen to be independent. Ultimately the Council will have to decide how much weight is to be given to it. Some amendments to the document have been made to make this clear.</p> <p>The point made in para 6.2.8 is that no matter what the costs might be they should have been taken into account in the residual valuation of the site. It is only in circumstances where such costs come to light after acquisition that they can reasonably be taken into account.</p>
	<p>The Core Strategy sets out the definition of affordable housing. There is no reference to the Housing Register or the criteria for joining the Register which may change over time. It is unreasonable to impose additional qualifying criteria via the SPS (para 7.1.1).</p>	<p>The information provided here is to inform readers of where future ‘nominees’ to new affordable housing schemes will come from. The statement does not impose any additional qualifying criteria on developers. The Borough Council can only legally nominate applicants from its Housing Register and in accordance with its Allocations Scheme.</p>
	<p>The proposed nomination arrangements (para 7.1.2) are accepted. This should ensure that the vast majority of lettings are to households meeting the Housing Register criteria.</p>	<p>Noted</p>

	<p>The principle of a “Local Lettings Plan for larger developments (para 7.1.3) is strongly supported.</p>	<p>Noted</p>
	<p>The Council is entitled to have a preferred list of RSLs but not to impose particular RSLs (para 8.1.1 and 8.1.2). If the Council is to maintain a preferred list (Annex F) it must be explicit about both the selection criteria and the general standards these partners have signed up to.</p>	<p>The document has been amended at para 8.1.2 to set out the selection criteria.</p>
	<p>Trenport understand that Guinness Trust is to be added to the list based upon the outcome of recent affordable housing competition for the Peters Village development.</p>	<p>The list of preferred RSL partners will be reviewed during 2008/09 and no decision has yet been taken on the inclusion or rejection of Guinness Trust. Once revised the Annex in the SPD will be updated.</p>
	<p>Affordable housing is only required to be provided “<i>in perpetuity</i>” in relation to Rural Exception Sites (para 8.1.3). This reference should therefore be amended to refer to simply securing affordable housing “<i>for future eligible households</i>” in line with the PPS3 definition.</p>	<p>Agreed. The documents has been amended accordingly at para 8.1.3.</p>
	<p>A requirement for leases to be no less than 999 years is unduly onerous (para 8.1.4). Leasehold disposals of 99 to 125 years to RSLs are no uncommon and have proved to be acceptable to the Housing Corporation.</p>	<p>This is a typographic error. It should have read 99 years.</p>

	<p>The principle of model planning conditions (Annex K) and model Section 106 Agreements (Annex L) is commended. However the Law Society/DCLG model has been widely criticised. Both Annex K and Annex L require considerable further work in collaboration with landowners, developers and RSLs before they are finalised.</p>	<p>The section 106 Agreement is that recommended by Government. However, it is made clear in Annex L that in the case of the Section 106 Agreement there will be circumstances where it may need to be changed. Some additional words have been included both in the Annexes and in the text of the document to make it clear that they are the start point for negotiations.</p>
	<p>Section 10 – off-site Provision This section is generally welcomed but there is a lack of clarity as to where the Council’s preferences lie. Trenport would have expected the least favoured option to be a commuted sum, but this is acceptable in “<i>exceptional circumstances</i>” whereas the purchase of existing properties is only acceptable in “<i>very exceptional circumstances</i>” (Paras 9.1.3 and 9.1.4). Furthermore, Trenport would have expected “<i>alternative sites</i>” to be the Council’s preferred option but this is not apparently the case.</p>	<p>The section has been amended to better reflect the Council’s position regarding affordable housing off-site. Priority will be established on a scheme by scheme basis.</p>
<p>Rydon Homes</p>	<p>Section 3.1 - Meeting affordable housing need – Any assessment of housing need must be undertaken on a parochial basis, not across the Borough as a whole. Any need identified in a specific location should be met in that location, not elsewhere.</p>	<p>This is not in accordance with Government guidance which now requires housing needs to be assessed at a sub-regional level. However, it is agreed that local needs assessments are essential if Rural Exception Sites are to be proposed (paras 4.3.6-4.3.8 of the SPD refer)</p>

<p>Section 3.3 – Supported Housing - Supported housing is not appropriately accommodated within market led developments where general needs affordable housing is more suited and should take precedence. Any such need should be met directly with RSLs and relevant care agencies.</p>	<p>Strongly disagree. PPS3 makes it clear that local authorities should plan for a mix of housing having regard to the accommodation requirements of specific groups including, inter alia, disabled people. The HMNAS identified that there is a need for supported housing within the Borough the precise need for which is continually being refined. It is not inappropriate on larger developments for the Council to seek a proportion of housing to meet these specific needs.</p>
<p>Section 3.7 - Wheelchair-user Housing - Whilst it is considered appropriate to address the needs of this particular group, any requirement for fully adapted dwellings should be restricted to larger developments and only where demand is demonstrated. The implications of larger car parking spaces should also be recognised.</p>	<p>Paragraph 3.7 has been amended to better reflect the Council’s expectations and the unit types considered appropriate for wheelchair user housing.</p>
<p>Para 4.2.2 – Site Suitability – It is not only infrastructure requirements that impact on the viability of providing affordable housing, particularly on previously developed land. Discussions with developers need to include all aspects including existing use values and decontamination costs.</p>	<p>The issue of viability is referred to in the Stage 1 Assessment (paras 6.2.7- 6.2.12). Reference could usefully be included under para 6.2.10 to “existing use values” and to decontamination as being one example of “site abnormalities”.</p>
<p>Para 4.3 Rural Affordable Housing Needs – the HMNAS identifies a general need for affordable housing in rural areas. It is therefore appropriate to meet those needs where they arise not at nearby urban areas or strategic development sites.</p>	<p>This is a matter off strategic policy as determined in the now adopted Core Strategy. It is not a matter for the SPD.</p>

<p>The SPD needs to specify more clearly what is meant by the term “rural”. Is it a planning policy definition or does it relate to the Housing Corporation’s funding definition involving population thresholds.</p>	<p>It is a planning definition. The rural areas are everything outside of the defined urban areas. It is accepted that Definitions could usefully be included in Annex A</p>
<p>Paras 4.3.10 to 4.3.12 – Selection of RSL – It is not appropriate or necessary for the local authority or Parish Council to select a preferred RSL. Annex F has no legal standing.</p>	<p>The Council has adopted preferred RSL partners for the reasons cited at Section 8.1. Unless a private developer is seeking to provide rural affordable housing directly then it is envisaged that an RSL would need to be involved.</p>
<p>Para 4.3.11 should be subject to “mortgagee in possession” clauses as required by RSL lenders.</p>	<p>Disagree. Government guidance contained in PPS3 makes it clear that affordable housing in perpetuity can be sought on rural exception sites. Such schemes would not therefore be subject to a mortgagee in possession clause.</p>
<p>Para 4.3.12 – any nomination agreement should be between the RSL and the local authority and not the developer.</p>	<p>The Government now encourages the private sector to become involved in the delivery of affordable housing. Although it is unlikely it is not impossible that a developer may seek in future to provide affordable housing themselves. In such circumstances the Council would expect to secure nomination rights in the same way as if the units had been provided by an RSL.</p>

<p>Para 5.1.2 – Design – A restriction on concentrations of affordable units is generally accepted, but there should be greater flexibility in the maximum numbers. 10-15 houses is usually acceptable to RSLs for management purposes, but the capping should be more flexible depending on the size and type of development.</p>	<p>This section has been amended to reflect the general aim of ensuring the affordable housing is properly integrated with the private market housing.</p>
<p>Paras 6.2.2 and 6.2.5 - Providing affordable Housing without grant – providing service land for affordable housing at nil cost is an extra burden on the market units. When combined with existing use value this will often render a scheme unviable and unachievable if 40% affordable housing is required. Nil value can be achieved if the percentage is lowered. Government advice is that <i>“if funding is not available from other sources, this could include requiring intermediate housing instead of social rented from developer contributions, or reducing the overall number of affordable homes required”</i> This advice should be reflected in the SPD.</p>	<p>Paragraph 6.2.2 has been amended to make clear that while NIL land value may not guarantee a grant free scheme it is the starting point for negotiations.</p> <p>Paragraph 6.2.5 and 6.2.6 have been amended to take account of situations where an alternative arrangement may be necessary.</p>
<p>Paras 6.2.8 – 6.2.10 - Assessing Viability – The split of affordable housing between social rented and shared ownership is too prescriptive and detailed at this stage. Social rented housing without grant is very difficult to deliver. Any percentage split should be based on viability and on an up-to-date Housing Needs and Market Assessment. Para 6.2.10 goes some way to identifying the extent of overheads the reality of constraints in a site appraisal.</p>	<p>The split is defined in the adopted development plan. It is emphasised that it is the start point for negotiations having regard to the availability of grant and the viability of development.</p>

	<p>Para 8.1.8 – Car Parking - the parking requirements for affordable housing should not be the same as for the market housing. RSLs are accepting a ratio of 1:1.</p>	<p>This is contrary to the views expressed elsewhere. The start point for negotiations, as on any scheme, should be the adopted Kent Vehicle Parking Standards which are maximum standards and do not differentiate between affordable and market housing.</p>
	<p>Para 8.2.2 Conditions and Legal Agreements - early discussion with the Council’s Housing and Planning Teams and RSL’s is “<i>useful</i>” but not “<i>critical</i>”.</p>	<p>Neither word is used in the paragraph. It says that the Borough Council would “expect” early contact. This is likely to be even more relevant with the imminent requirement for applicants to submit an Affordable Housing Statement with their application before it can even be registered.</p>
	<p>Section 9.1 – Alternatives to on-site provision – Allowing commuted sums or off-site provision only in “<i>exceptional circumstances</i>” is too restrictive and not beneficial to the delivery of all forms of housing. If an element of funding is not forthcoming the Council will have nothing to use alongside other local authority grants from the types of supported housing referred to in para 3.3.1.</p>	<p>PPS3 makes it clear that the presumption is that affordable housing will always be provided on site. Off-site provision is only acceptable where it can be robustly justified.</p>
	<p>A cascade arrangement should be applied whereby the affordable housing requirement if not implemented within a specified timescale can transfer to the payment of a commuted sum.</p>	<p>Paragraph 6.2.5 and 6.2.6 have been amended to take account of situations where an alternative arrangement may be necessary.</p>
	<p>Para 9.1.7 Alternative Sites - The application of a 40%</p>	<p>On the contrary, to not count the original site in terms</p>

	<p>requirement to both sites when providing housing off-site is considered to be double counting and therefore completely inappropriate. This would double the financial burden and render the scheme unviable.</p>	<p>of the assessment of an appropriate level of provision would result in an under supply of affordable housing that would otherwise be achieved. Off-site provision is about the most appropriate location of affordable housing and not about the overall level of provision which should not be adversely affected by the decision to accept off-site provision.</p>
	<p>Annex I – Space Standards - In Rydon’s experience a number of RSLs consider the size requirements in Annex I to be unnecessarily large. They are prepared to accept a range of 80-90 sq m for 3 bed/5 person and 101-110 sq m for 4 bed/6 person accommodation.</p>	<p>It is made clear in Annex I that the standards are only indicative.</p>
	<p>General Comment The whole thrust of the SPD relies on providing new general needs housing. No evidence has been provided as to the levels of under-occupancy within the existing stock. It is far more cost-effective to encourage elderly residents to relocate to existing category 1 sheltered housing schemes thus freeing up to 4 bed spaces per existing dwelling for family accommodation.</p>	<p>This is incorrect. The HMNAS was a comprehensive assessment of need across all tenures. It makes the case that social rented is the most sought after tenure in the borough because of the relationship between incomes and house prices both to rent and buy. The study also looked at the need for supported housing.</p> <p>Conclusions on need took account, inter alia, of re-lets in the existing RSL stock which would capture any units freed up as a result of people downsizing. It is neither possible nor wise to base an affordable housing programme on the potential for people to downsize: the numbers are considered insignificant and an unsafe basis on which to plan a programme of new delivery. For example, what guarantee is there that somebody under-occupying would be happy to</p>

		move? Many people wish to remain in their home well into old age and the Government's approach is to facilitate them remaining in situ through internal adaptations and support being provided.
Millwood Designer Homes	A series of comments on the issue of affordable housing generally of more relevance to the now adopted Core Strategy. However, the main point of relevance made is that each site needs to be considered on its individual merits and circumstances, otherwise there could be a detrimental affect on viability. It is accepted that this will need to be demonstrated by development appraisal.	The issue of site-specific viability is central to the advice in the SPD.
	The Council's objective of meeting at least 60% of new housing on brownfield sites is supported but it must be recognised that these sites will have greater development costs which will affect viability, particularly if there is a requirement for the provision of affordable housing.	The issue of site-specific viability is central to the advice in the SPD.
RPS on behalf of Fairview Homes Ltd	Para 5.1.2 Design – Fairview object to the principle of maximum affordable housing concentrations of no more than 10 units for housing and 40 for flats. For management reasons RSLs tend to require rented and intermediate housing to remain separate with each having their own access and communal areas. In addition, Fairview consider that the distribution of social housing throughout a site can have a detrimental effect on market values and private sales. On this basis, they consider it is inappropriate to have small clusters of affordable housing throughout a site.	The references to clusters has been revised.

	<p>Para 5.2.1 – Purpose Designed Supported Housing – Fairview object to the Council seeking to specify specific facilities and design features to be provided in new development schemes. This goes well beyond the normal responsibilities of a planning authority and imposes an unacceptable level of control on the developer. There must always be sufficient flexibility for housebuilders to best determine the appropriate design of a development scheme based on market and commercial considerations.</p>	<p>The provision of affordable housing for those with special needs is entirely appropriate within the scope of PPS3 and advice from the Government's affordable housing agency the Housing Corporation. The SPD contains design guidance for developers to help them in meeting the Council's affordable housing policy objectives in this area.</p>
	<p>Para 8.1.7 Maintenance and Service Charges - Fairview object to the Council seeking to control service or management charges. This goes beyond the requirements of land use planning. It should be a matter for negotiation between the developer and the RSL.</p>	<p>The guidance sets out the Council's expectations. Affordability can only be secured with some certainty and control over housing costs, including service charges. In the light of comments elsewhere the level of service charge referred to has been changed.</p>
	<p>Section 8.2 – Developer Contributions - These must be considered on a site-by-site basis and be in line with Circular 05/2005. They request that, in line with this advice, reference should be made in the SPD to any contributions only being sought where it can be demonstrated that they are reasonable, necessary and related to the scale of development.</p>	<p>The argument is accepted and, of course, the Council will comply with Government policy, but there is no need to repeat it in this document because it goes without saying.</p>
<p>National Farmers Union</p>	<p>The NFU particularly supports the guidance at Section 4.3 (Rural Housing Needs). It is crucial to the rural economy that suitable housing is available to those employed in rural</p>	<p>Noted</p>

	businesses, including agriculture and horticulture but also across the wider spectrum of rural enterprises.	
Hadlow College	Supports the view that there is a pressing need for affordable housing in Tonbridge and Malling. As an employer of 300 people there is great difficulty in employing people when the cost of housing is so high.	Noted
The London Green Belt Council	No comments on the SPD. Para 4.3.3 correctly reflects the provisions of PPS3. Nevertheless, expresses concern that in an authority that has a high proportion of Green Belt too many “very special circumstances” may end up being the “norm” which could then harm the Green Belt.	By definition, any provision of affordable housing in the Green Belt will need to be justified by “very special circumstances” and therefore will be the normal situation, but the scale of such provision will, by its very nature, be extremely limited.
Tonbridge and Malling Green Party	The purpose of the document is clear	Noted
	The second Aim should be revised to read “promote energy efficiency and renewable energy”	It is accepted that “where practicable” this should be the case and a change to the aim should therefore be made.
	The following aims should be added: <ul style="list-style-type: none"> To ensure that car free housing is designed as part of new affordable housing developments to reduce car parking requirements and that all new developments are adequately served by public transport. 	These aims are applicable to all housing development and not just affordable housing. As such they are embodied in the terms of Core Policies CP1 , 2 and 24 and reflected in Kent Design which has already been adopted by the Council as SPD. It is therefore not necessary to repeat them in the Affordable

	<ul style="list-style-type: none"> • To secure play areas for children which are easily observed from housing • To provide high standard walking and cycling routes within new developments which link to existing and new cycle routes to assist in building a framework of such routes throughout the Borough. 	Housing SPD
	The process of delivering affordable housing is clear	Noted
	They would favour 50% affordable housing on developments of 2 or more.	This is not a matter for the SPD. The level of affordable housing and the thresholds have been established in the now adopted Core Strategy.
	Not happy about any sort of ghettoisation of specific social groups. The best communities are those where people of all ages, conditions and aptitudes are mixed.	There is no reference in the document to ghettoisation. On the contrary, the aim is to ensure seamless integration of small clusters of affordable housing throughout private sector developments. References to the sizes of clusters have been revised.
	They support the advice on Rural Exception Sites. The Council should consider buying properties in villages to meet local social housing need.	The SPD provides that in certain cases consideration will be given to the purchase of existing dwellings off site.
	The advice in Annexes H and I on Space Standards is	The design guidance reflects that of the

	largely opaque and needs proper explanation within the body of the report. To what extent do space standards include the recognition of home-based employment (eg construction work) or tele-working. The sizes do not generally seem large enough.	Government's affordable housing agency the Housing Corporation.
	The guidance on funding demonstrates the over-restricted position that Tonbridge and Malling is in with regard to funding for social housing.	Noted
	The sections on Allocations and lettings and Delivery are helpful.	Noted
	The Green Party is not happy with off-site provision. The Council should strenuously seek to avoid allowing developers to exercise this option. They believe that the Council should itself purchase housing to meet social needs, particularly in rural areas, whenever funds allow.	The approach follows that recommended in PPS3. The Council does not have the capital resources available to purchase affordable housing. The HC also will not grant fund the purchase of existing units.
Tonbridge Civic Society	Found the advice on funding difficult to understand. Has usefully drawn attention to some typographic errors in the document.	Typographic corrections will be made.
Kelvin Hinton	In overall terms the purpose of the document is clear, but the text does adopt a professional jargonistic approach and a lay person may have difficulty following or understanding some of the content. Perhaps para 1.1.1 would benefit from a	Don't disagree but the terminology is consistent with Government guidance, and a glossary is included. It is not aimed at the layman. It is principally aimed at developers and their agents.

	<p>simple explanation of what affordable housing actually is.</p>	
	<p>The Aims are clear, but perhaps the first bullet point should be revised to read:</p> <ul style="list-style-type: none"> • <i>To secure provision of an appropriate amount and mix of tenures to meet housing need.</i> <p>An additional aim could be:</p> <ul style="list-style-type: none"> • <i>To secure balanced residential communities.</i> 	<p>Do not disagree with this suggested change</p> <p>This aim could usefully be added. It is less strategic than the version suggested by Tetlow King</p>
	<p>Para 1.3.3 says that the Council will facilitate an independent development appraisal. It is not clear what this will mean in practice. To avoid protracted counter-arguments any independent appraisal should be binding on both parties. The cost of any such appraisal should be met by the applicant.</p>	<p>The word “facilitate” should be changed to “undertake”. It is agreed in response to other representations that this should be a collaborative process, but it must also be seen to be independent. At the end of the day it will be for the Council to decide what weight to afford to its conclusions. There is no mechanism for it be regarded as binding on either party. Its significance is in its independence.</p>
	<p>Para 2.1.4 refers to “<i>particular target groups</i>”. This is rather impersonal and it is not clear what it is referring to. It would be preferable to identify the group or groups being referred to.</p>	<p>The groups are identified by income. References to “target groups” has been changed.</p>

	<p>It is important that the SPD gives <i>indicative</i> advice with regard to housing mix. The actual mix negotiated and secured in respect of any submitted planning application will be dependent on the specific site and development proposal. This will be influenced by the vision and objectives for the specific development project and by scheme viability and the level grant/subsidy available.</p>	<p>Annex C makes it clear that it is indeed referring to an “indicative” housing mix.</p>
	<p>Para 3.2.3 should make clear that it is talking about “<i>intermediate affordable housing</i>” rather than “<i>intermediate market housing</i>”</p>	<p>The paragraph refers to ‘immediate’ housing need and is not concerned with tenure.</p>
	<p>It would be helpful if clarification was given as to what priority would be given to each of the categories of special housing needs.</p>	<p>They are all a priority. Site-specifics circumstances will dictate the priority in individual development proposals. A sentence has been added which makes clear that the Council is seeking to provide a range of unit types but that the three groups cited are the key priorities in this area.</p>
	<p>It is suggested that the percentage provision of Lifetime Homes (Para 3.6.2) should be increased.</p>	<p>The text has been amended to say at least 10% subject to various listed factors</p>
	<p>The advice on Qualifying Sites is clear, but it is suggested that in para 4.2.2 it is made clear that any open book assessment will be independently assessed. Furthermore, it is suggested that the availability of grant or subsidy is not in itself a consideration of site suitability but this may influence the quantum, nature or standard of affordable housing</p>	<p>Site suitability is dependant on whether a residential development can be achieved and not dependant on availability of grant. A change has been made to make this clear. The starting point for negotiations is to assume NIL grant. Grant should only be sought where it can clearly be justified and would lead to</p>

provide.	additional affordable housing.
The advice on the rural Exception Sites is clear	Noted
The SPD should make it clear that all affordable housing within schemes will be “ <i>tenure blind</i> ”. The SPD should also note that standards will rise incrementally over the next few years as the Code for Sustainable Homes is implemented and it should make clear what the Council’s aspirations or requirements are in this respect.	Agree - and Para 5.1.5 has been amended accordingly.
The guidance on funding is helpful. However, it should be made clear in para 6.2.1 that the availability of grant from the Housing Corporation will be on the basis that any such grant will “ <i>add value</i> ” to the affordable housing. It should also be confirmed that the cost of any independent assessment of viability should be met by the applicant (para 6.2.6).	Agree to make reference to “added value”, but the Council is not able to make a charge specifically for the viability assessment. This will be contributed towards by the planning application fee and any charge for pre-application advice.
The Section on Allocations and Lettings is helpful	Noted.
Section 8 – Delivery This is an important section of the document. Inclusion of standard conditions and Section 106 Agreement will be helpful to potential applicants in formulating their proposals. Such examples should only be used as a guide so that there is flexibility in the specific wording to take account of particular site circumstances.	Amendments have been made to make it absolutely clear that they are only the start point for negotiations.

	<p>There is no mention as to the possible use of the cascade mechanism within a Section 106 obligation. The Council should make clear its approach to the use of cascades. Recent research carried out by English Partnerships and the Advisory Team for Large Applications is commended.</p>	<p>Paragraph 6.2.5 and 6.2.6 have been amended to take account of situations where an alternative arrangement may be necessary.</p>
	<p>The Section on Off-Site Provision is helpful</p>	<p>Noted.</p>
	<p>It is suggested in para 3.1.1 that reference should be made to local authorities engaging with public/private sector partners in order to deliver affordable housing. Recent government advice makes it clear that they expect local authorities to pro-actively engage with the relevant sectors to ensure actual delivery on the ground rather than simply facilitating this through the grant of planning permission.</p>	<p>It has long been the Council's practice to work closely with developers to ensure the implementation of their proposals, but the market pressures are such in Tonbridge and Malling that the Council does not normally need to take a pro-active role in order to facilitate development once a site has been allocated and a permission granted. There is no need to specifically mention this in the SPD</p>
	<p>It is considered that the document would benefit from further commentary in respect of the Council's approach to pre-application discussions specifically with regard to affordable housing. This is particularly important with regard to larger scale developments.</p>	<p>The Council believes the document does place sufficient emphasis on pre-application discussions.</p>