

CABINET

Statutory consultation on the Draft Meeting Housing Needs Supplementary Planning Document

4th September 2012

Report of Head of Regeneration and Planning

PURPOSE OF REPORT			
To seek a resolution from Cabinet to publish and consult on the Draft Meeting Housing Needs Supplementary Planning Document (SPD).			
Key Decision	<input checked="" type="checkbox"/>	Non-Key Decision	<input type="checkbox"/>
			Referral from Cabinet Member
Date Included in Forward Plan	23 rd April 2012.		
Project Appraisal Undertaken	(N/A)		
This report is public.			

RECOMMENDATIONS OF COUNCILLOR HANSON

- (1) That Cabinet resolves to publish and consult on the Draft Meeting Housing Needs Supplementary Planning Document (SPD). An extensive period of statutory public consultation will then commence on 1st October and conclude on 11th November.

1.0 Introduction

- 1.1 The Meeting Housing Needs SPD has been prepared to support and guide developers (applicants) in addressing the Council's housing related policies contained within the Lancaster District Core Strategy (adopted July 2008). The policy areas covered by the SPD include market housing, affordable housing, rural housing, and accommodation for specific communities. The document also provides technical guidance and templates to support the planning application process.

2.0 Background

- 2.1 Supplementary Planning Documents were introduced by the Planning and Compulsory Purchase Act 2004 and replaced Supplementary Planning Guidance. Because SPDs are subject to greater consultation they are therefore given greater weight when planning applications are decided. The

process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2004.

- 2.2 The National Planning Policy Framework (NPPF) published in March 2012 defines SPDs as "documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan." The NPPF also states that SPDs should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.

3.0 Strategic Context

- 3.1 The Lancaster District Core Strategy (adopted July 2008) stated that an SPD was the appropriate local development document to provide the detailed approach on achieving the delivery of the Core Strategy's affordable housing targets. The Meeting Housing Needs SPD relates in the main to Policy SC4 of the Core Strategy, which is concerned with meeting the district's housing requirements. It also relates in part to other Core Strategy policies including SC1 (sustainable development), SC2 (urban concentration), and SC3 (rural communities).
- 3.2 The SPD also relates to "saved" Local Plan Policy H10. Although this policy has been partly superseded by the Core Strategy it will continue to be taken into account alongside Core Strategy Policy SC4 until it is entirely superseded by the development management policies contained in the emerging Local Plan following adoption of this document in 2014.
- 3.3 Following adoption, the SPD will replace all existing guidance on meeting the district's housing requirements; Supplementary Planning Guidance 10: Affordable Housing (March 2002) and the Affordable Housing Practice Update (January 2011).

4.0 Preparation of the SPD

Earlier work

- 4.1 The 2010 Affordability Housing Viability Study was prepared by Adams Integra and provided the Council with new evidence on the ability of the district's housing market to deliver various levels of affordable housing. The Study examined the influence of a range of affordable housing targets and thresholds on the viability of sample schemes. Following receipt of the Study the Council prepared the Affordable Housing Practice Update which described the process for negotiating affordable housing. This document was implemented in January 2011 and replaced the 2008 version.
- 4.2 The preparation of the Affordable Housing Viability Study and the Affordable Housing Practice Update was supported by stakeholder engagement through a Key Stakeholder Group that met three times during the preparation of both documents. This group comprised residential developers, planning agents, land agents, and registered providers of social housing operating in the

district.

Information Gathering

- 4.3 In order to develop the SPD the Council reconvened the Key Stakeholder Group so that the earlier work could be used as a basis for engaging with stakeholders around the preparation and content of the SPD. The group met in February 2012 and stakeholders were briefed on the aims and objectives of the SPD and invited to provide their perspectives on a range of issues to help inform the preparation and content of the SPD. A schedule of consultees invited to the Key Stakeholder Group and summary of comments is set out in Appendix A.
- 4.4 Following this meeting, the Council emailed a survey (see Appendix B) that asked a series of key questions on the content of the SPD. This was sent to the Key Stakeholder Group and also a number of other relevant stakeholders that were identified via the LDF database. The intention was to help inform the content of the draft SPD ahead of the statutory public consultation. The survey also included a briefing note to provide more detail on the preparation process. A list of consultees sent the Survey is set out in Appendix C, and a summary of comments received from consultees sent the Survey is set out in Appendix D.
- 4.5 The information gathering process for the SPD was also promoted via a press release which featured in the Lancaster Guardian in the first week of March 2012; on the Shaping a Better Future Facebook page; and on the Council's Twitter feed.
- 4.6 All engagement was carried out in accordance with the Council's Statement of Community Involvement (SCI), which was adopted in June 2006.

Statutory Consultation

- 4.7 Proceeding to this stage will require Cabinet's approval. On the basis that approval is achieved then the Draft SPD will be subject to a 6 week statutory consultation period from 1st October to 9th November 2012. The statutory consultation will be carried out in accordance with the process set out in the Town and Country Planning (Local Development) (England) Regulations 2004 (amended 2008).
- 4.8 Letters and emails will be sent to the following organisations giving notice of the consultation, and details of where and when the Draft SPD and accompanying documents can be inspected.
- :
- English Heritage, Natural England, and the Environment Agency (as the three statutory consultation bodies);
 - The Homes and Communities Agency; and
 - South Lakeland District Council, Wyre Council, and Lake District Nation Park Authority.
- 4.9 Letters and emails will also be sent to organisations that participated in the Key Stakeholder Group and also the town and parish councils giving notice of the consultation, and details of where and when the Draft SPD and

accompanying documents can be inspected.

- 4.10 An email will also be sent to all other stakeholders on the LDF consultation database giving notice of the consultation, and details of where and when the draft SPD and accompanying documents can be inspected.
- 4.11 Prior to the statutory consultation period (week commencing 24th September 2012) the Draft SPD and accompanying documents will be placed in Lancaster and Morecambe town halls, as well as the Cable Street office, and the main libraries (Lancaster, Morecambe, Heysham, Carnforth). The intention is to allow members of the public to inspect the documents.
- 4.12 The Draft SPD and accompanying documents will also be published on the Council website week commencing 24th September 2012. This will also include details of where and when the draft SPD and accompanying documents can be inspected.
- 4.13 A local advert will be published in both the Lancaster Guardian and Morecambe Visitor during week commencing 24th September 2012 providing details of where and when the Draft SPD and accompanying documents can be inspected.
- 4.14 The availability of the Draft SPD will also be publicised in the following ways:
- Online consultation via the Council's website;
 - A press release to be issued week commencing 24th September 2012 to local newspapers, radio and TV;
 - Details of the consultation on the Shaping a Better Future Facebook page; and the Council's Twitter feed;
 - Details of the consultation on the Current consultations page of the Council's website;
 - An email notifying all Members of the consultation to be sent week commencing 24th September 2012;
 - Hard copies of the SPD provided in the Member's rooms for reference; and
 - An email notifying appropriate officers in the Planning and Regeneration Service and Housing and Health Service to be sent week commencing 24th September 2012; and
- 4.15 Following the conclusion of the statutory consultation, all comments received will be recorded and reviewed. The SPD will then be updated accordingly to reflect comments. It is anticipated that the publication version of the SPD will be reported to the January 2013 meeting of Cabinet seeking approval to adopt.

5.0 Key SPD issues

- 5.1 Affordable housing contributions are required from all proposals that will result in a net increase in the overall number of dwellings. Small schemes up to 4 dwellings are expected to provide a financial contribution and larger schemes of 5 or more dwellings are expected to provide on site affordable housing.

- 5.2 Up to 20% on site affordable housing is required from schemes that propose a net increase of 5 to 9 dwellings in a rural location, or 5 to 14 dwellings in an urban location.
- 5.3 Up to 30% on site affordable housing is required from schemes that propose a net increase of 10 plus dwellings in a rural location, or 15 plus dwellings in an urban location.
- 5.4 The opportunities for developing new housing on Greenfield sites will be limited but where this is permitted the Council will require increased affordable housing provision (up to 40%). The precise requirement will be agreed via negotiation and will be influenced by site specific issues.
- 5.5 If adopted then the Community Infrastructure Levy (CIL) may reduce the Council's ability to request affordable housing contributions because it will also impact on development viability. CIL is a charge which local authorities in England and Wales can place on developers for most types of development and the monies generated can then be used (or pooled for future use) to pay for strategic infrastructure improvements.
- 5.6 An affordable tenure mix of 50% social rented and 50% intermediate will be required of all schemes but the Council will seek to ensure that the specific tenure mix, dwellings type and size of dwellings reflect local housing needs as evidenced by the 2011 Housing Needs Survey or other local evidence where appropriate.
- 5.7 Developers are expected to realistically assess the full cost of developing new housing before applying for planning permission, with consideration made of the cost of land acquisition, site remediation, abnormalities, construction, finance, affordable housing provision, and other planning obligations. In particular, developers are expected to fully consider the cost of purchasing land, buildings or an option on land before applying for planning permission, as these costs will impact on the ability of the scheme to meet the required affordable housing provision, and therefore scheme viability.
- 5.8 Proposals for residential development in the West End of Morecambe and the area covered by the Morecambe Area Action Plan (MAAP) are not required to provide an affordable housing contribution as this can have a significant impact on development viability because property values are much lower than elsewhere in the district. This therefore acts as a disincentive to securing much needed investment.
- 5.9 In recent years the Council has permitted new rural residential development in 8 settlements that retain a sufficient number of key services to make these settlements sustainable. In order to better meet rural housing needs development will be considered in rural settlements with fewer key services where it can be demonstrated that the proposals will maintain or enhance the vitality of the local community. A key aspect of this is how well a proposed development meets local housing need.

6.0 Details of Consultation

- 5.1 Full details on the preparation of the Meeting Housing Needs SPD are dealt

with under section 4.0 of this report (Preparation of the SPD).

- 5.2 In addition to this consultation officers presented a report to the 13th March 2012 Planning Policy Liaison Group (PPCLG) detailing how the SPD would be prepared. A further report updating PPCLG was received at the 28th August 2012 meeting ahead of the 4th September Cabinet meeting.
- 5.3 In terms of focused consultation on sustainability issues affecting the SPD, officers are confident that such issues have been intensively explored and tested during the preparation of the Council's Core Strategy and emerging Local Plan. Because the SPD links to the higher-level sustainability testing of both documents then the likely affects of the SPD are in-line with those anticipated for both documents. Therefore this SPD has not been subject to its own sustainability appraisal. The Core Strategy Sustainability Appraisal reports can be found at: <http://www.lancaster.gov.uk/ldf>

4.0 Options and Options Analysis (including risk assessment)

	Option 1: Approve the recommendation and thus publish and consult on the Draft Meeting Housing Needs SPD.	Option 2: Do not approve the recommendation and do not publish and consult on the Draft Meeting Housing Needs SPD.
Advantages	The Council will have available complete and up to date guidance on meeting housing needs (albeit in draft) that applicants can refer to when preparing specific planning proposals and the Development Team can refer to when considering specific planning applications.	Delaying the publication of the SPD will allow time for further internal consultation, although adequate time has already been allowed for this.
	The Council will be aligned with the National Planning Policy Framework (NPPF) requirement that SPDs provide further guidance on particular issues (in this instance meeting housing needs).	
	The Council will be aligned with the NPPF requirement that SPDs add further detail to the policies in the Local Plan.	
Disadvantages	The SPD's focus on how the Council will achieve affordable housing from new residential development may attract renewed criticism from developers / applicants around the impact this has on viability which may be viewed as being at odds with the NPPF.	
Risks	Applying the approach to calculating commuted sums to conversions (as distinct to new build) may attract some criticism because the in-principle expectation of affordable housing contributions from a net increase in units (whether new build or conversion of existing) is described within a development management policy in the Draft Local Plan which has not yet been adopted. Although public consultation on the preferred options version of the Draft Local Plan is anticipated to commence on 22 nd October, the document is not anticipated for adoption until September 2014. However, paragraph 216 of the NPPF states that	The absence of a fully consulted on SPD providing complete and up to date guidance on meeting housing needs may put the Council at risk from future appeals to overturn decisions made where planning proposals did not address relevant policies in the adopted Core Strategy.

	<p>decisions makers may also give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan. On this basis, the Draft Local Plan can be thought of as a material consideration (but of limited weight), and might usefully inform the consideration of a development proposal.</p>	
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6.0 Officer Preferred Option (and comments)

- 6.1 The officer preferred option is Option 1 so that the Council has in place complete and up to date guidance on meeting housing needs.

RELATIONSHIP TO POLICY FRAMEWORK

Lancaster District Core Strategy. This proposal will make a positive contribution to Policy SC4 in terms of meeting the district's housing requirement.

Lancaster District Housing Action Plan. This proposal will support implementation of the forthcoming Action Plan by guiding applicants on how proposed developments should meet the housing needs of the district.

CONCLUSION OF IMPACT ASSESSMENT

(including Diversity, Human Rights, Community Safety, Sustainability and Rural Proofing)

The Meeting Housing Needs SPD will contribute towards meeting the housing needs of those in unsuitable accommodation, in terms of the size and location. This will allow improved access to employment, training and education opportunities, and will contribute towards ensuring social cohesion which in turn should impact on community safety. Affordable or low cost market housing in rural locations will also contribute to improved access to housing where often younger families and vulnerable households cannot access suitable and affordable accommodation.

LEGAL IMPLICATIONS

The Meeting Housing Needs SPD will provide new guidance around the use of Nominations Agreement and Local Occupancy Criteria agreement, and S106 agreements which should assist applicants in understanding the legal implications of specific proposals. This will require liaison between Regeneration and Planning and Legal.

FINANCIAL IMPLICATIONS

The Meeting Housing Needs SPD will provide new guidance on the negotiation of commuted sums. Assuming that no changes are made in due course to the financial management arrangements, as and when the monies are received they would be held in the Commuted Sums – Affordable Housing Reserve until such time as they are required, at which point the capital programme would be updated accordingly to reflect their application to specific schemes.

The wider financial implications attached to local planning and the supply of homes (such as local tax raising capacity and future service demands) have been outlined previously to Cabinet, and feature in the related Council report that was deferred at the July meeting.

OTHER RESOURCE IMPLICATIONS

Human Resources:

None.

Information Services:

None.

Property:

None.

Open Spaces:

None.

SECTION 151 OFFICER'S COMMENTS

The Section 151 Officer has been consulted and has no further comments.

MONITORING OFFICER'S COMMENTS

The Monitoring Officer has been consulted and has no further comments.

BACKGROUND PAPERS

Draft Meeting Housing Needs SPD.

Contact Officer: David Hayward, Planning Officer.

Telephone: 01524 582723

E-mail: dhayward@lancaster.gov.uk

Ref:

Appendix A:
Schedule of consultees invited to the Key Stakeholder Group and summary of comments recorded.

Consultee	Attended (Yes / No)	Summary of comments recorded
Adactus	No	
Barrat Homes	No	
Blue Sphere	No	
Bowsall Limited	Yes	
Briery Homes	No	
Countryside Properties	Yes	The SPS should focus on market housing as well as affordable housing.
Fisher Wrathall	Yes	Concerns expressed around the rising costs of planning applications. The SPD should streamline and simplify the process. Concerns expressed around poor housing provision for older people in rural settlements to allow down sizing.
Garner Planning Associates	Yes	Concerns expressed around the approach to affordable housing and the impact on housing completions. Clarity is needed around how affordable housing will relate to the CIL.
Great Places	No	
Guinness Northern Counties	No	
Harrison Pitt Architects	Yes	
Harrison Willis & Moor	No	
Homes and Communities Agency	No	
Impact	Yes	As a registered provider we do try hard to encourage developers to get in touch with us. There is not a minimum number of affordable units we would be prepared to purchase from a market scheme.
JMP Architects	Yes	
JWPC Ltd	Yes	
Lambert Smith Hampton	No	
Applethwaite	Yes	
Mason Gillibrand	Yes	
Michael A Harrison Architects	No	
Miller Homes	No	
Nathaniel Lichfield and Partners	No	
Peel Land and Property	Yes	

Peill and Co	No	
Persimmon	No	
Places for People	Yes	Will the proposed affordable housing tenure mix allow for shared ownership?
Richard P Taylor	Yes	
Russell Armour Homes	No	
Steven Abbot Associates	No	
Story Homes	No	
Turley Associates	No	
The Planning Bureau	Yes	

**Appendix B:
Information Gathering Survey and Briefing**



Promoting City, Coast & Countryside



**Shaping
a better future**



**Shaping
better development**



**Shaping
the urban future**



**Shaping
the rural future**

Survey: Meeting Housing Needs Supplementary Planning Document

This survey is part of the Information Gathering stage of preparing the Supplementary Planning Document (SPD). It asks some key questions on the content of the SPD to help inform a consultation draft that will be subject to formal consultation at the end of June 2012. The related Briefing Note provides more detail on the process.

Your feedback is important so please provide as much detail as you can.

Do you support the preparation of a Supplementary Planning Document (SPD) to help meet housing needs?

Should the SPD include information on the following?

- Explanation of relevant government policy and targets
- Explanation of relevant regional and local policy
- Information on housing need in the district
- Glossary of terms

Should the SPD include the following?

- Affordable housing targets and thresholds
- A clear definition of affordable housing
- A clear description of affordable housing tenures and the proportions expected

Should the council request an affordable housing contribution from all new development that result in a net increase in homes, whether new build, change of use to residential, or conversion from a larger property?

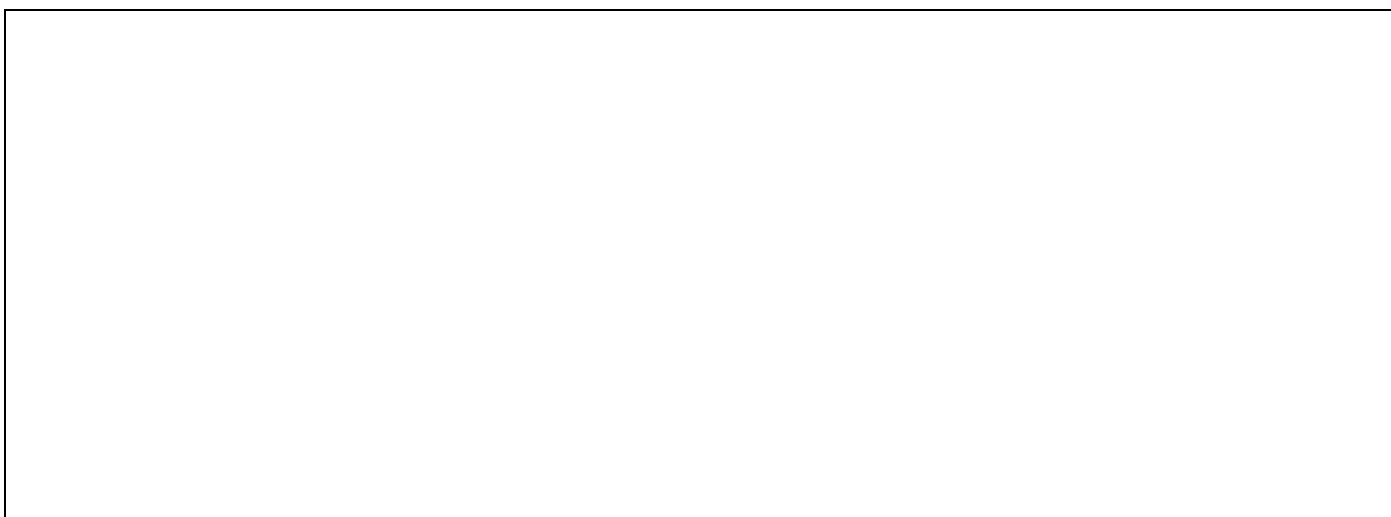
Should the SPD include guidance on design and layout issues (e.g. mix, integration, design, sustainability, accessibility etc)?

A large, empty rectangular box with a thin black border, intended for a response to the question above.

Should the SPD include guidance on legal procedural issues (e.g. standard clauses expected from Section 106 agreements)?

A large, empty rectangular box with a thin black border, intended for a response to the question above.

Should the SPD include information on the planning process (e.g. pre-application discussions, the committee process etc)?

A large, empty rectangular box with a thin black border, intended for a response to the question above.

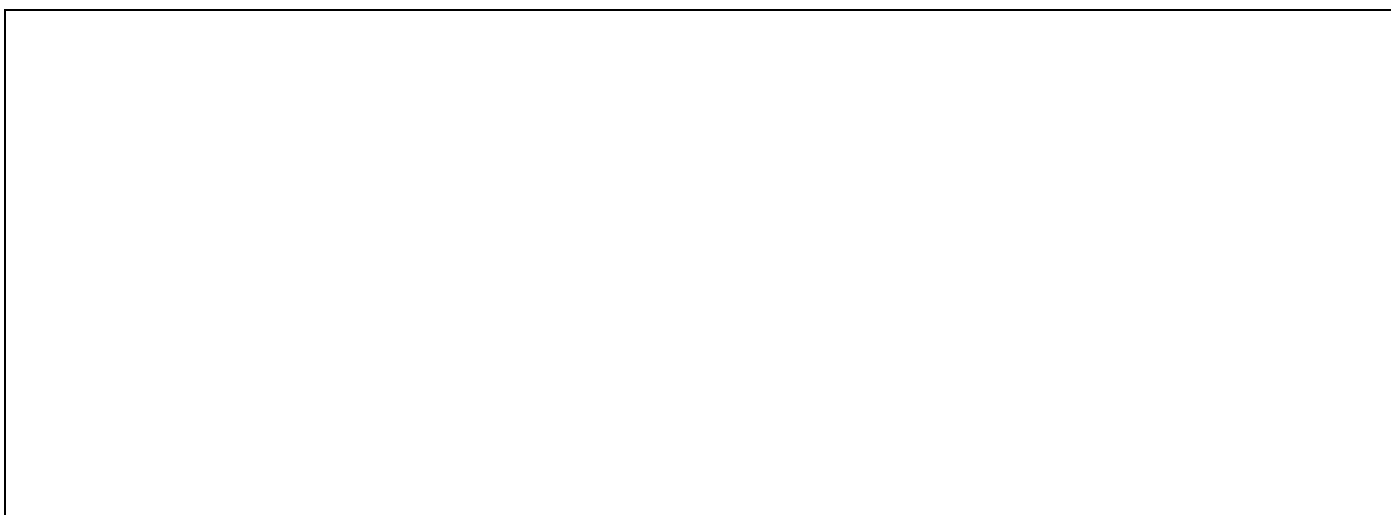
Should the SPD include guidance on commuted sums are calculated?

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Should the SPD include information on registered providers of social housing?

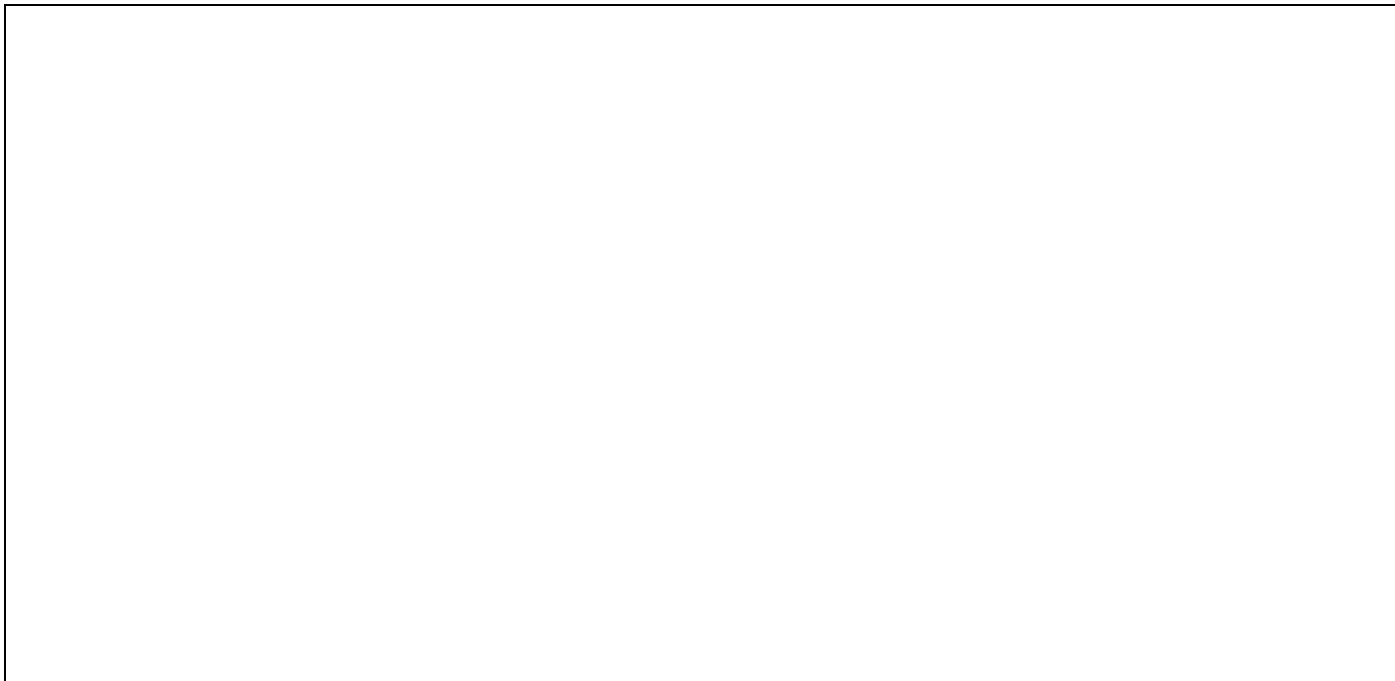
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Should the SPD include details of scenarios where affordable housing contributions may be waived or reduced?

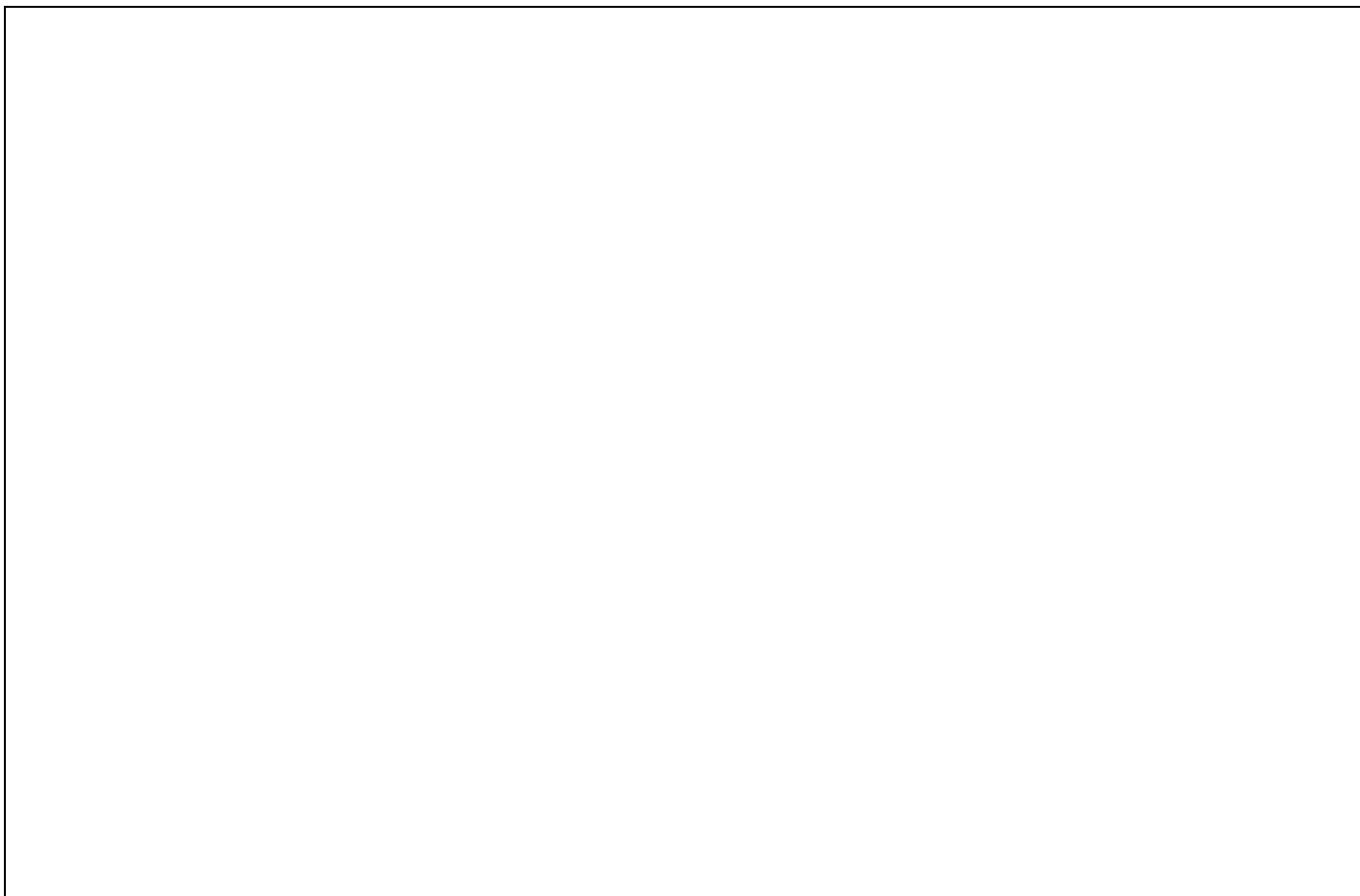
A large, empty rectangular box with a thin black border, intended for a response to the question above.

Should the SPD include templates? For example:

- A development appraisal
- Affordable Housing Statement
- Model S106 agreement and Unilateral Undertaking



Should the SPD include details on the evaluation and allocation of commuted sums monies to affordable housing schemes?



What else should the council consider or include in the SPD?

The closing date is Friday 30th March.

Please email your completed survey to: dhayward@lancaster.gov.uk

Alternatively you can post your completed survey to:

David Hayward – Planning Officer (Housing and Communities)
Planning and Housing Policy Team
Lancaster City Council
PO Box 4
Town Hall
Dalton Square
Lancaster
LA1 1QR

Briefing Note: Meeting Housing Needs Supplementary Planning Document

Introduction

Lancaster City Council is in the process of gathering information ahead of preparing a Meeting Housing Needs Supplementary Planning Document (SPD). This document will provide greater detail on Policy SC4 of the Lancaster District Core Strategy which considers how the council will help meet the district's housing requirements. Policy SC4 sets out the council's intentions to:

- Maximise the opportunities offered by the development of new dwellings to redress imbalances in the local housing market;
- Achieve housing that genuinely addresses identified local housing need; and
- Secure units of "in-perpetuity" affordable housing.

The SPD will also support delivery of "saved" Local Plan Policy H10. This policy relates to affordable housing and has been partly superseded by the Core Strategy. Although this policy will continue to be taken into account alongside Core Strategy Policy SC4 it will be entirely superseded by the Development Management Development Plan Document (DPD) once adopted in 2013.

Guidelines for preparing a Supplementary Planning Document

SPDs were introduced by the Planning and Compulsory Purchase Act 2004 and replace Supplementary Planning Guidance. SPDs are subject to greater consultation and are therefore given greater weight when planning applications are decided. The process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2004.

Planning Policy Statement 12: Local Spatial Planning also provides guidance on preparing SPDs. The key principles can be summarised as:

- Provide greater detail on DPD policies, and be consistent with them;
- Not to be prepared with the aim of avoiding the need for the examination of policy which should be examined;
- Add value to the assessment of development proposals;
- Not be used to allocate sites;
- Consider national policy objectives which should be considered in a DPD;
- Subject to a sustainability appraisal where significant effects are likely to be raised;
- Adopt by council resolution; and,
- Sufficient resources should be allocated to the preparation.

The council's Statement of Community Involvement (SCI) also explains how the council will prepare an SPD.

The rationale for the Supplementary Planning Document

The overarching driver for the SPD is found in the adopted Core Strategy which stated that an SPD is the appropriate local development document to provide the detailed approach on achieving the delivery of the Core Strategy's affordable housing targets. The Core Strategy also stated that changes to the housing market, the emergence of new evidence, and the receipt of new Government guidance (Planning Policy Statement 3: Housing) meant that an SPD would be prioritised, and would include

guidance on definitions, site thresholds, and set targets for tenure types.

Planning Policy Statement 3: Housing (PPS3) is the key national policy driver for local authorities to improve the affordability and supply of housing. PPS3 requires local authorities to provide a robust, transparent and up-to-date assessment of the financial implications of affordable housing policy, and to set affordable housing targets that reflect viability, delivery risks and finance for affordable housing. PPS3 also suggests that local authorities set lower thresholds where viable and practicable, provided there is robust evidence justifying both the need for affordable housing and the threshold.

The application of PPS3 was tested at both Blyth Valley BC and the City of Wakefield BC where the respective affordable housing targets were found to be unsound. Both cases demonstrated the importance of ensuring affordable housing policy is underpinned by evidence, and balances maximising affordable housing with achievable targets that don't discourage development.

The implications of PPS3 led to the council commissioning an Affordability Housing Viability Study in October 2009. The Study examined the influence of a range of affordable housing targets and thresholds on the viability of sample schemes in order to test the circumstances in which the district's housing market can deliver various levels of affordable housing. Following this work, the council prepared an Affordable Housing Practice Update which replaced an earlier Practice Update (published in 2008), which itself was based on earlier evidence (2007 Housing Needs Survey Update). The Practice Update is used alongside Supplementary Planning Guidance 10: Affordable Housing.

Since 2007 the UK housing market has experienced a dramatic slowdown resulting from the global economic downturn. This has impacted on the ability to raise deposits, and a severe reduction in the availability of mortgage and development finance. Consequently fewer new homes have been built causing a growing demand for new housing, particularly affordable housing. In Lancaster district only 79 new homes were completed during 2010/11 with just 29 of these affordable (37%). The shortage of new housing was highlighted in the council's 2011 Housing Needs and Demand Survey which an annual shortfall of 476 market and 339 affordable homes (based on identified needs and adjusted to reflect stock turnover).

Process of preparing the Supplementary Planning Document

The first stage of the preparing the SPD focuses on gathering information on the content of the SPD. This process first began in 2009 when the council engaged with key stakeholders on the preparation of the Affordable Housing Viability Study, the Affordable Housing Practice Update. A wider group of stakeholders were also asked for their feedback on the Practice Update and members of the public were invited to give their views.

Following the conclusion of the information gathering stage, a consultation draft of the SPD will be prepared. A formal consultation period will then take place in accordance with the regulations, starting at the end of June and lasting for 6 weeks. Anyone with an interest in the document will be able to access the consultation draft and related documents via the council website or at council offices and the main public libraries.

Following the conclusion of the formal consultation, Members will be asked to approve the SPD before it can be adopted. Once adopted the adopted SPD will be made available via the council website or at council offices and the main public libraries along with a summary of the representations received and how they have been addressed.

Suggested Content

There are a range of topics and issues that the SPD will need to address to meet the objective of providing greater detail on Core Strategy Policy SC4. The survey that accompanies this briefing note suggests some areas and topics for inclusion, and the responses will help inform the consultation draft.

Appendix C:
List of consultees sent the Information Gathering Survey

Consultee	Method
Adactus	Letter and Email
ADL Architects	Email
Anchor Trust	Email
Applethwaite	Letter and Email
Arkholme-with-Cawood Parish Council	Email
Arnside/Silverdale Area of Outstanding Natural Beauty Management Unit	Email
Barrat Homes	Letter and Email
Bellway Homes	Email
Black Health Agency	Email
Blue Sphere	Letter and Email
Bolton Emery Partnership	Email
Bolton-le-Sands Parish Meeting	Email
Borwick Parish Council	Email
Bovis Homes Limited	Email
Bowsall	Letter and Email
Briery Homes	Letter and Email
Burrow-with-Burrow Parish Meeting	Letter
Cantsfield Parish Meeting	Email
Carr Gomm	Email
Cassidy Ashton	Email
Caton-with-Littledale Parish Council	Email
Chelford Homes	Email
Claughton Parish Council	Email
Cockerham Parish Council	Email
Contour Homes	Email
Countryside Properties	Letter and Email
CPRE	Letter
Crosby Lend Lease	Email
David Wilson Homes North West	Email
De Pol Associates	Email
DH Design	Email
Ellel Parish Council	Email
English Heritage	Email
Fisher Wrathall	Letter and Email
Friends of the Earth (North Lancashire)	Email
Friends, Families and Travellers	Email
Garner Planning Associates	Letter and Email
Gill Dockray Architects	Email
Gleeson Homes	Email
Graham Anthony Associates	Email
Graham Bolton Partnership Planning	Email
Great Places	Letter and Email
Gressingham Parish Council	Email
Guinness Northern Counties	Letter and Email
Gypsy Council	Letter
Halton-with-Aughton Parish Council	Email
Harrison Pitt Architects	Letter and Email
Harrison Willis & Moor	Letter and Email
Harron Homes	Email
Heaton-with-Oxcliffe Parish Council	Email

Home Builders Federation	Email
Homes and Communities Agency	Letter and Email
Hornby-with-Farleton Parish Council	Email
Ian J Potts Associates	Email
Impact	Letter and Email
Indigo Planning	Email
Ireby and Leck Parish Council	Letter
James Barr	Email
JMP Architects	Letter and Email
Johnnie Johnson Housing Trust Ltd	Email
Jones Lang LaSalle	Email
JWPC Ltd	Letter and Email
King Sturge	Email
Knight Frank	Email
Lakes Architect Limited	Email
Lambert Smith Hampton	Letter and Email
Lancashire Care NHS Foundation Trust	Letter
Lancashire Constabulary	Email
Lancashire County Council	Email
Lancashire Fire and Rescue Service	Email
Lancaster Canal Trust	Email
Lancaster Civic Society	Letter
Lancaster District Chamber of Commerce, Trade and Industry	Email
Lancaster Property Network	Email
Land Access and Recreation Association	Email
Maple Grove Developments	Letter and Email
Mason Gillibrand	Letter and Email
McCarthy and Stone Developments Ltd	Email
Melling-with-Wrayton Parish Council	Email
Mellor Architects	Email
Middleton Parish Council	Email
Mike Harrison	Letter and Email
Miller Homes	Letter and Email
Morecambe Bay Partnership	Email
Morris Homes	Email
Nathaniel Lichfield and Partners	Letter and Email
National Farmers Union	Email
National Grid Company PLC, Planning & Environment Group	Email
National Travellers Action Group	Email
National Trust	Email
Nether Kellet Parish Council	Letter
Network Rail	Email
Norman Jackson Contractors Ltd	Email
North Lancashire NHS	Email
NW Structural Consultants Limited	Email
Over Kellet Parish Council	Letter
Over Wyresdale Parish Council	Email
Overton Parish Council	Letter
Paul Butler Associates	Email
Peel Land and Property	Letter and Email
Peill and Co	Letter and Email
Persimmon	Letter and Email
Places for People	Letter and Email
Planning Specialist Envirolink Northwest	Email
Priest Hutton Parish Meeting	Email
Quernmore Parish Council	Email
Regenda	Email

Richard P Taylor	Letter and Email
Roeburndale Parish Meeting	Letter
Rural Innovation	Email
Russell Armour Homes	Letter and Email
Salvation Army Housing Association	Email
Savills	Email
Scotforth Parish Council	Email
Signposts	Email
Silverdale Parish Council	Email
Skerton High School	Email
Slyne-with-Hest Parish Council	Email
Smiths Gore	Email
Stagecoach North West	Email
Steven Abbot Associates	Letter and Email
Story Homes	Letter and Email
T Gill	Email
Tatham Parish Council	Email
Taylor Wimpey	Email
The Planning Bureau	Letter and Email
Thomas Associates Architects	Email
Thurnham Parish Council	Email
Transition City Lancaster	Email
Tunstall Parish Meeting	Email
Turley Associates	Letter and Email
Two Castles Housing Association	Email
Warton Parish Council	Email
Wennington Parish Council	Email
Whittington Parish Council	Email
Wray-with-Botton Parish Council	Email
Yealand Conyers Parish Council	Email
Yealand Redmayne Parish Council	Email

Appendix D:**A summary of comments received from consultees sent the Information Gathering Survey.**

Consultee	Summary of comments / feedback
English Heritage	The consultee acknowledged that many of the survey questions were not appropriate for English Heritage to respond to, however it was suggested that rural housing needs should be addressed separately in the document. A link to English Heritage publication "Affordable Rural Housing and the Historic Environment" was also provided.
Eric Wright Group	The consultee was supportive of the preparation of an SPD. In summary the main comments arising were 1. That the proportion of social rented units is crucial as it requires much greater cross-subsidy from the market dwellings and thus affects viability; 2. That the inclusion of 1 or 2 social rented units on small sites amongst up market homes can affect the saleability and value of those homes and hence overall scheme viability. 3. Not in agreement on requesting affordable housing contributions on a net increase basis because on small developments there will be insufficient revenue from the market dwellings to cross subsidise the affordable units, and developers/landowners will be deterred from bringing schemes forward. 4. Following on from the previous point, on conversion schemes it is often not possible to incorporate small units within the constraints imposed by the structure and layout of the existing building. Also it may not be feasible to include affordable homes (particularly social rented) and service charges for maintaining the building and common parts etc will make the homes unaffordable. 5. Disagreed that the SPD should include guidance on design and layout issues because it is a policy document and cannot be prescriptive and that developers will determine this based on knowledge of local market demand together with consultation with the planning officer and registered provider. 6. Information on the planning process should not be included because it is readily available elsewhere. 7. Agreed that there must be recognition that there are exceptions where it is not feasible or viable to apply standard "one size fits all" policies. 8. Agreement that a model S106 agreement would reduce the time it currently takes to agree a S106 agreement, allow schemes to start on site sooner, and will also provide more certainty that the terms will be acceptable to lenders. 9. An approved development appraisal is required to assess viability. Where a landowner has unrealistic expectations of land value it could assist in demonstrating that the residual land value has been calculated in accordance with a set format and may convince the landowner to accept a more realistic value.
Fisher Wrathall	The consultee was supportive of the preparation of an SPD. but made the point that housing needs need to be identified and to be appropriate to differing sites, so flexibility is required in terms of the percentage demands adequately reflecting the value and quality of type of each individual development. In summary the main comments arising were: 1. That the Council should require affordable housing on a net increase basis because only new build has any possibility of a sufficient margin to contribute. Therefore any levy should be graduated on schemes of 5 or less. 2. Guidance on design and layout issues should be included if guidance rather than mandatory. 3. It would probably be useful to have certain S106 standard clauses providing they are kept simple and understandable and cover the legal requirements rather than attempt to cover the specifics of individual sites. 4. Include guidance on how commuted sums are calculated because this is an area where virtually no one understands the present position. 5. The SPD should include information as regards different costs / charges from different registered providers. 6. The SPD should include details on the evaluation and allocation of commuted sums monies to affordable housing schemes because there is always a suspicion that funds are not ring fenced.
Garner Planning Associates	Consultee provided a letter expressing concerns around the approach being taken and the implications arising. This referred to an earlier representation provided on the Affordable Housing Viability Study which expressed concerns around the robustness of the document. In summary the main comments arising were: 1. The consultee stated that since 2009 housing completions have dropped so a different policy response is required. 2. The consultee feels that monies negotiated from

	smaller sites since implementing the Affordable Housing Practice Update (2011) are negligible. 3. The Council should amend the approach to negotiating affordable housing to stimulate housing delivery. 4. Concerns expressed around progressing an SPD rather than progressing with a development plan policy and that this is contrary to the National Planning Policy Framework.
Halton with Aughton PC	The parish council did not provide a completed response but did provide copies of the Parish Plan and a Halton Mills update document. In summary the parish council does not support the SPD so chose not to respond to the survey. The parish council did however restate their policy on housing by saying that there are existing permissions for almost 100 new homes on the Halton Mills site, so therefore no new housing is needed until this scheme is completed. In addition the parish council is opposed to the re-designation of agricultural land to housing since there is no shortage of brownfield housing sites. In addition there is no gap in provision of affordable housing, but the parish housing needs survey identified a need for housing suitable for people over 55 who may be looking for smaller properties designed for older people. This would free up more family accommodation within the village.
Hornby with Farleton PC	The parish council did not complete the survey as they had insufficient time to complete survey. They did however request a clearer definition of what constitutes "affordable" in an expensive location such Hornby.
Impact HA	The consultee agreed with the preparation of an SPD. In summary the main points were: 1. There is a need to include the ability to be flexible depending on viability assessment and to exercise discretion around thresholds. 2. Concerns expressed around the SPD being too specific on insisting that developers meet requirements such as the Code for Sustainable Homes, Lifetime Homes etc as this can limit the number of affordable homes delivered because of the increase in cost and affect on the viability. 3. A statement on exceptional circumstances is sufficient but no details required.
Lancashire County Council	The consultee did not provide a completed response on basis that housing is not part of the county's planning remit.
National Trust	The consultee agreed with the preparation of an SPD. In summary the main points were: 1. The SPD must have regard to the NPPF. 2. No object per se to the inclusion of guidance on design and layout issues it does on the face of it appear to be outside the areas identified previously to be covered by this SPD, e.g. in terms of the content of the Core Strategy, so therefore might best be left to existing adopted Planning Policy or covered in a separate SPD on standards for new housing development. 3. Agreement that guidance on how commuted sums are calculated would be a helpful. 4. Proposals for rural enterprise worker accommodation or charitable key worker should be exempt.
Network Rail	The consultee did not provide a completed survey response but did provide a "standard" planning policy consultation response the details of which were mostly outside of scope of the SPD and more relevant to a development management development plan document.
Persimmon Homes	The consultee stated support for the preparation of the SPD on the basis it provides clarity and certainty, and helps with the interpretation of policy. In summary other points raised include applying flexibility in the application of affordable housing requirements. 2. The Council should be careful that placing strict guidelines around the provision of affordable housing does not result in housing development stifling. 3. Disagreed that guidance around design and layout is required as the SPD is specific to housing needs, and matters concerning design should be covered in other documents. 4. There should not be surrounding the mix of market housing as this would cause inflexibility. 5. Disagreed that guidance on legal procedures is required because Section 106 agreements are produced at the point of negotiation and clauses should be specific to each scheme. Providing excessive guidance will result in the document becoming cumbersome and heavy as a tool to use. 6. Agreed that guidance on calculating commuted sums should be included to make the process clear and transparent, and provide developers with more of an idea about what costs they will incur when assessing viability. 7. Agreed that the SPD should provide scenarios that are exceptional such as if a site is contaminated or has extra costs

	attached through converting an existing building this should be taken into account. If a developer is paying for remediation works or other high costs then ultimately if they also have to provide affordable housing this might make certain developments unviable.
Planning Bureau	The consultee did not provide a completed survey response but did provide a letter containing comments prepared on behalf of McCarthy and Stone Retirement Lifestyles Ltd. In summary the main point raised was around the exclusion of the needs of an ageing population particularly as the 2011 Housing Needs Survey evidences the aging population of the district. 2. It is important to recognise that the NPPF requests that 'local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market'.
Story Homes	The consultee provided a completed survey response. In summary the main points raised were: 1. The Council might need to ensure that the Core Strategy in general, and in particular, Policy SC4, is in conformity with the NPPF prior to progressing any SPD to provide further detailed guidance on the implementation of that policy. 2. No objection in principle to the preparation of an SPD, but consideration should be given to addressing these issues within a Local Plan or Land Allocations DPD where site specific issues can be addressed in greater detail with the benefit of a full viability assessment which is now a central spine running through the NPPF. This would also allow affordable housing targets and other financial burdens to be considered in the context of infrastructure provision and any CIL requirements and if need be a site specific basis. 3. The advent of the NPPF has amended the policy landscape so that LPAs should set out their policy on local standards in the Local Plan including requirements for affordable housing. 4. Regarding a net increase approach to affordable housing contributions, any such substantial shift in policy away from that contained within Policy SC4 would need to be developed and progressed within a Local Plan / Allocations DPD not an SPD. 5. The SPD could contain further information relating to design and sustainability so long as it relates to the implementation of other Core Strategy policies (on the basis they are in conformity with the NPPF) and does not provide a greater financial burden to developers or is contrary to the guidance within the NPPF. 5. Any guidance relating to commuted sums would need to be in accordance with the NPPF which requires on site provision, unless off-site provision or a financial contribution of a broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. 6. The NPPF advises on the importance of ensuring viability and deliverability and any Local Plan / SPD policy will need to be in accordance with this. It states that sites and scale of development identified in plans should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking into account the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable development to be deliverable.
Yealand Conyers Parish Council	The parish council provided a completed survey response. In summary the main points were: 1. The parish council were in general agreement with the preparation of an SPD. 2. The village is located in a conservation area so consideration should be given to how any new building applications would be viewed within these constraints.
Silverdale Parish Council	The parish council provided a completed survey response. In summary the main points were: 1. The parish council were in general agreement with the preparation of an SPD. 2. However affordable housing contributions should only be levied on developments of 2 or more homes but not from change of use, with monies apportioned to the locality / parish from where they originated. 3. The parish council did not agree that guidance on issues such as design and layout, legal procedures, and the planning process should be included within the SPD.
Member of the public	The consultee did not provide a completed survey response but made the following points: 1. Affordable housing should be brought forward on brownfield

	<p>sites only and not greenfield. 2. Suitable brownfield sites are Luneside, Albion Mills, and the former K Shoe factory site (Lancaster), and Frontierland (Morecambe). 3. Too much emphasis has been placed on retail and commercial development and that these sites are perfectly OK to bring forward affordable housing and would tidy the area up around Bulk Road.</p>
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