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a better future



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better development



**Shaping**  
the urban future



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the rural future

## **Public Participation Statement**

**Regulation 12 (a) Town and Country Planning (Local Planning) (England) Regulations 2012**

**Meeting Housing Needs Supplementary Planning Document**

**January 2012**

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## 1.0 Introduction

- 1.1 This Public Participation Statement sets out how Lancaster City Council has prepared the Meeting Housing Needs Supplementary Planning Document (SPD) in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>1</sup>.
- 1.2 In particular this Statement provides details of the approach taken to ensure that effective and meaningful stakeholder engagement took place and also the resulting feedback relating to all stages of preparation.
- 1.3 The following table provides a summary of the preparation of the Meeting Housing Needs SPD.

Stage	Dates
Key Stakeholder Group meeting	28 <sup>th</sup> February 2012
Information Gathering Questionnaire & Briefing circulated	2 <sup>nd</sup> March 2012
Deadline for Questionnaire responses	30 <sup>th</sup> March 2012
Draft SPD prepared	Spring and Summer 2012
Cabinet approval to consult on Draft SPD	4 <sup>th</sup> September 2012
Statutory consultation period starts	1 <sup>st</sup> October 2012
Statutory consultation period ends	9 <sup>th</sup> November 2012
Cabinet approval to adopt SPD	22 <sup>nd</sup> January 2013
Adopted SPD, Public Participation Statement, and Adoption Statement published	1 <sup>st</sup> February 2013

## 2.0 Purpose of the Meeting Housing Needs SPD

- 2.1 The Meeting Housing Needs SPD is supplementary to the Lancaster District Local Plan (adopted in 2004) and the Lancaster District Core Strategy (adopted in 2008). Its purpose is to provide additional detail and guidance on how the Council will, as the local planning authority interpret and apply relevant policies from the adopted development plan.

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<sup>1</sup> With effect from 6th April 2012, the Town and Country Planning (Local Development) (England) Regulations 2004 (Statutory Instrument 2004 No. 2204) were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012 (Statutory Instrument 2012 No. 767). Therefore 2004 Regulation 18 was replaced by 2012 Regulations 12(b) and 13.

2.2 The key objectives of this SPD are:

- To aid effective implementation of saved Local Plan policy H10 and Core Strategy Policy SC4 which is concerned with meeting the district's housing requirements, and housing aspects of Core Strategy policies SC1 (sustainable development); SC2 (urban concentration); and SC3 (rural communities).
- To provide clear direction to all parties on how to interpret these policies;
- To bring together the relevant existing Council guidance and practice on the delivery of residential development; and
- To guide all applicants on how to liaise with the Council and on what information required to ensure planning applications are not delayed unnecessarily.

2.2 Because this document is an SPD, it does not introduce any new policy and is not part of the adopted development plan. However it does add further detail to the relevant policies from the adopted development plan. The SPD is therefore a material consideration for any individual or organisation that wishes to make a proposal for residential development within the administrative area of Lancaster City Council.

2.3 This SPD supersedes the Supplementary Planning Guidance 10: Affordable Housing (March 2002) and the Affordable Housing Practice Update (January 2011).

2.4 Please note that the Council is currently preparing a new Lancaster District Local Plan that will eventually supersede all of the 'saved' policies in the adopted 2004 Local Plan.

### **3.0 Context and Evidence Base**

3.1 The National Planning Policy Framework (NPPF) published in March 2012 provides the current context for the preparation of SPDs. The NPPF defines SPDs as "documents which add further detail to the policies in the Local Plan". The NPPF also says that SPDs "can be used to provide further guidance for development on specific sites, or on particular issues, such as design"; and that SPDs "are capable of being a material consideration in planning decisions but are not part of the development plan."

3.2 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. The NPPF can be downloaded at: <http://www.gov.uk/government/publications/national-planning-policy-framework--2>

3.3 The process for preparing this SPD began with the 2009 Affordable Housing Viability Study, which is the Council's most recent evidence base on residential development viability. This Study examines the ability of the district's housing market to deliver various levels of affordable housing. This was achieved by analysing the influence of a range of affordable housing targets and thresholds on the viability of typical development scenarios.

- 3.4 Following the conclusion of this Study the Council then prepared and consulted on an Affordable Housing Practice Update. This document described the process for negotiating affordable housing as part of the approach to implementing Core Strategy Policy SC4 (Meeting the District's Housing Requirements). Following the consultation process, implementation of the Practice Update was agreed by the Planning and Highways Regulatory Committee in November 2010 and was subsequently adopted in January 2011. The Practice Update therefore replaced the 2008 Practice Update that was adopted in 2007 following an update of the 2004 Housing Needs Survey.
- 3.5 A comprehensive consultation process supported both the preparation of the Affordable Housing Viability Study, and the Affordable Housing Practice Update. At the core of this process was a Key Stakeholder Group that met several times during the preparation of both documents. The Group drew in both local and regional experience and perspectives from residential developers, planning agents, land agents, and registered providers. The Affordable Housing Viability Study and related documents can be downloaded at: [www.lancaster.gov.uk/affordablehousing/](http://www.lancaster.gov.uk/affordablehousing/)
- 3.6 The preparation of this SPD has also been informed by the 2011 Housing Needs Survey which was informed by a range of data sources including a household questionnaire to gather current primary data. The Survey provides the Council with an up to date robust evidence base on the genuine housing needs of existing and concealed households, and of households planning to move to more suitable accommodation. The Housing Needs Survey and related documents can be downloaded at: [www.lancaster.gov.uk/housingneed](http://www.lancaster.gov.uk/housingneed)

## **4.0 Information Gathering**

- 4.1 In order to comply with the Council's adopted Statement of Community Involvement (SCI) the first stage of preparing the SPD was to gather information to inform the document. It was decided that the Key Stakeholder Group should be involved in this process once again. The Group was reconvened and invited to attend a briefing in February 2012 covering the aims and objectives of the SPD. Stakeholders were invited to provide their perspectives on a range of issues to help inform the preparation of the SPD.
- 4.2 Following this briefing, the Council circulated a questionnaire and briefing note to the Key Stakeholder Group and a range of additional stakeholders. The questionnaire responses were then used to inform the preparation of the SPD (see Appendix 4). The SPD preparation was also promoted via a press release which featured in the Lancaster Guardian in the first week of March 2012; as well as the Council website, the "Shaping a Better Future" Facebook page; and the Council's Twitter feed.

## **5.0 Statutory Consultation**

- 5.1 The Draft SPD for consultation was prepared during spring and summer 2012 and was then subject to a 6 week consultation period from 1st October to 9th November 2012. The consultation was carried out in accordance with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's adopted SCI.

- 5.2 Hard copies of the Draft SPD and related documents were made available for public inspection during normal opening hours at Lancaster Town Hall and Morecambe Town Hall, the Cable Street council housing office, and all Lancashire County Council public libraries in the district. The Draft SPD and related documents were also available for download from the Council website. Consultees were invited to provide their comments by using the Council's online consultation portal, or by emailing or posting a comments form. The Consultation documents can be downloaded at: [www.lancaster.gov.uk/meeting-housing-needs-spd](http://www.lancaster.gov.uk/meeting-housing-needs-spd)
- 5.3 The statutory consultees (English Heritage, Natural England, and the Environment Agency), the Homes and Communities Agency, South Lakeland District Council, Wyre Council, Lake District National Park Authority, and Yorkshire Dales National Park Authority were directly consulted on the Draft SPD. A wide range of key stakeholders were also directly consulted, including a range of registered providers of social housing, developers, and planning agents and consultants. In addition all elected members of the Council; Heysham and Morecambe town council, and each of the neighbourhood and parish councils, and parish meetings were directly consulted. Over 800 individuals and organisations registered on the Council's consultation database were also emailed regarding the consultation.
- 5.4 A public notice was placed in both the Lancaster Guardian and the Morecambe Visitor in September 2012, which provided details of the consultation and how to provide comments. The consultation was also communicated via the Council website, the "Shaping a Better Future" Facebook page; and the Council's Twitter feed, and promoted by the distribution of posters, and a press release which featured in The Morecambe Visitor on 9<sup>th</sup> October.
- 5.5 The Council received approximately 30 formal representations from consultees, ranging from members of the public to planning agents representing developers with land interests in the district (see Appendix 5).

## **6.0 Strategic Environmental Assessment/Sustainability Appraisal Consultation**

- 6.1 The Meeting Housing Needs SPD has not been subject to a sustainability appraisal because the requirement to do so was removed by the Planning Act 2008. The Council is satisfied that the sustainability issues (social, economic and environmental) relevant to this SPD have been fully explored and tested during the preparation of the adopted Core Strategy and also the preparation of the new Lancaster District Local Plan. This is on the basis that the SPD links to the higher-level sustainability testing of both documents and therefore the likely affects of the SPD are in-line with those anticipated for both documents. The Core Strategy Sustainability Appraisal reports can be downloaded at: [www.lancaster.gov.uk/sustainability-appraisal](http://www.lancaster.gov.uk/sustainability-appraisal)

## **7.0 Statement of Compliance with the SCI**

- 7.1 This SPD has been prepared in accordance with the adopted Lancaster District Statement of Community Involvement (SCI).

## Appendix 1

### Information Gathering: Schedule of consultees invited to the Key Stakeholder Group and summary of issues raised

Consultee	Attended (Yes / No)	Summary of issues raised
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	





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## 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?**

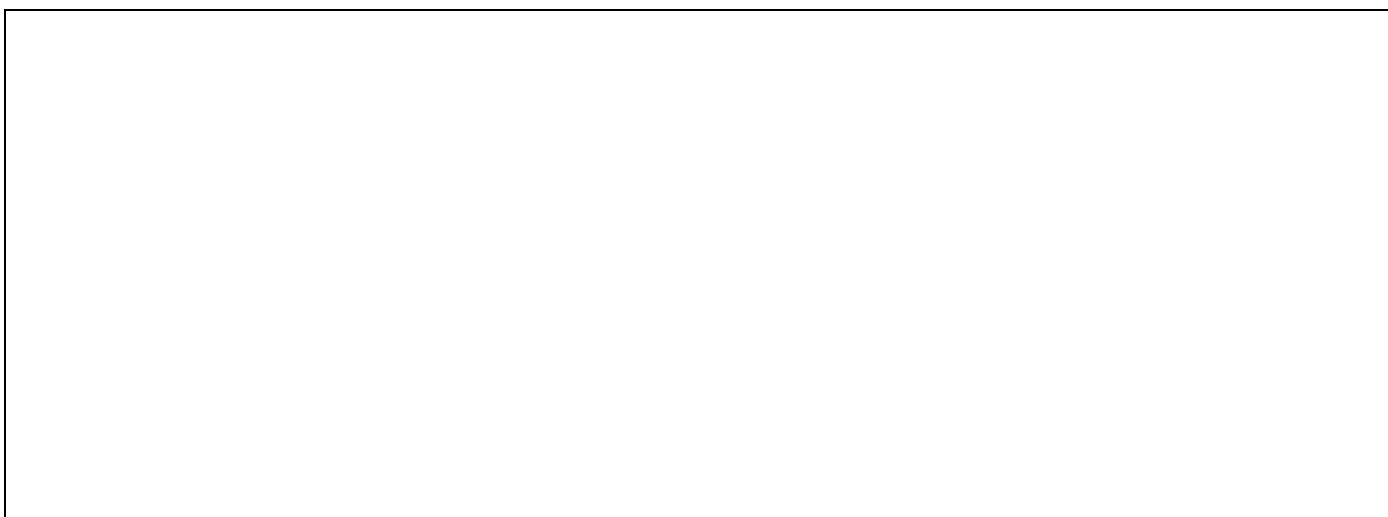
**Should the SPD include guidance on design and layout issues (e.g. mix, integration, design, sustainability, accessibility etc)?**

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

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**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.

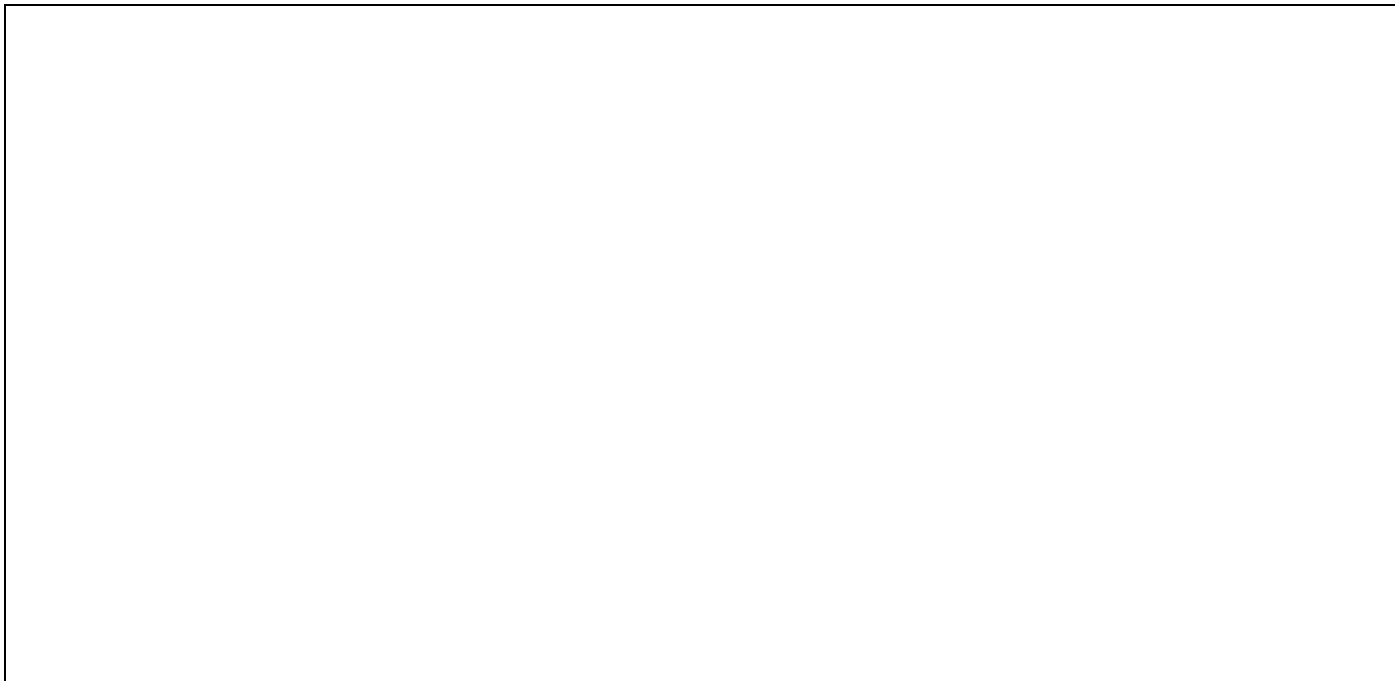
**Should the SPD include guidance on commuted sums are calculated?**

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

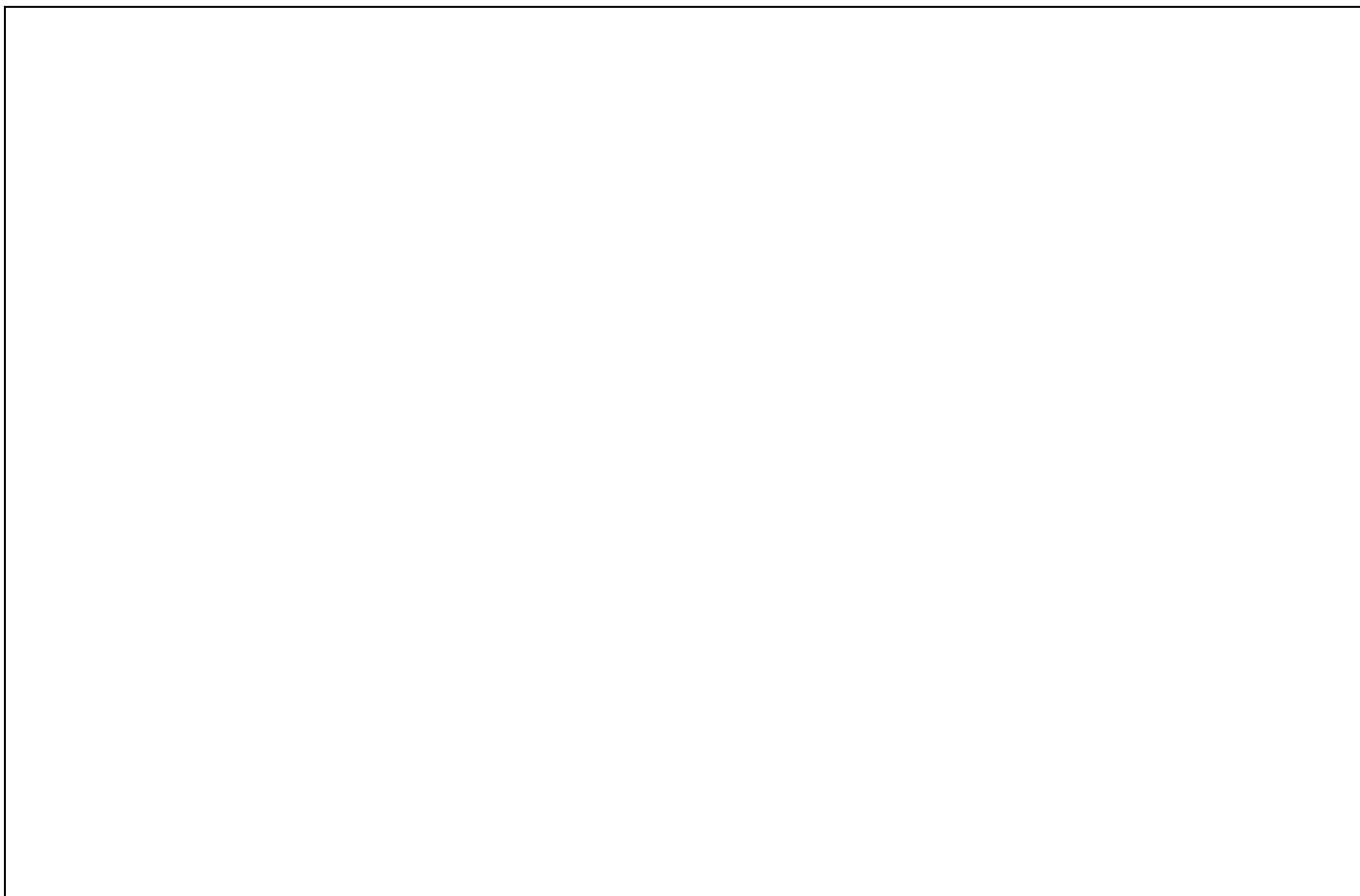
**Should the SPD include details of scenarios where affordable housing contributions may be waived or reduced?**

**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 30<sup>th</sup> March.**

**Please email your completed survey to: [dhayward@lancaster.gov.uk](mailto: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 3:  
Information Gathering: List of consultees sent the Questionnaire**

<b>Consultee</b>	<b>Method</b>
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 4:  
Information Gathering: Summary of issues raised through the Questionnaire**

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

	<p>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.</p>
Yealand Conyers Parish Council	<p>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.</p>
Silverdale Parish Council	<p>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.</p>
Member of the public	<p>The consultee did not provide a completed survey response but made the following points: 1. Affordable housing should be brought forward on brownfield 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>

**Appendix 5:  
Statutory Consultation: Summary of issues raised**

<b>Consultee</b>	<b>Summary of Issues Raised</b>	<b>Response</b>	<b>Action</b>
NLP Planning (on behalf of Countryside Properties Ltd and Peel Holdings Ltd)	Not supportive of the SPD in its entirety.	Comments noted.	No further action required.
	Concerns that the methodology for the preparation of the SPD is difficult to understand without reviewing the evidence base.	Comments noted.	Provide details and references for relevant evidence base in Chapter 1.
	Suggestion that the SPD provide further guidance and direction on how established housing needs and the objectives of existing development plan policies will be delivered.	The housing needs for Lancaster District are detailed in the 2011 Housing Needs Survey and the SPD has been prepared in the context of these needs. The SPD has also been prepared in the context of the adopted Core Strategy and will be subject to revisions following the adoption of the emerging Lancaster District Local Plan.	Provide details and references for relevant evidence base in Chapter 1.
	Does not accept that all of the proposed provisions of the SPD are derived from adopted development plan policies that have been tested at Examination and found to be sound.	The Council considers the provisions of the SPD to be derived from the adopted Core Strategy. The affordable housing provisions in particular are derived from Core Strategy Policy SC4 and informed by the current evidence base. Therefore the SPD seeks to support implementation of this policy with regard to this evidence base.	No further action required.
	Table 3 - concerns over the validity of the market housing needs in terms of dwelling types detailed in the SPD.	Table 3 of the SPD seeks to summarise the dwelling types and sizes that are required in the district sub areas. This data is drawn from the 2011 Housing Needs Survey and the Council considers this to be a robust evidence base. Ultimately the dwelling mix is determined on a site by site basis with evidence of local housing need providing important local context and informing the preparation of planning applications.	Insert text that clarifies that the Council expects dwelling mix to be determined on a site by site basis with evidence of local housing providing important local context and informing the preparation of planning applications.
	Paragraph 3.10 - concerns around the financial implications of market housing incorporating Lifetime Homes Standards and specific levels of the Code for Sustainable Homes, and calls for flexibility.	Comments noted.	Insert text that clarifies that all affordable dwellings must meet Code for Sustainable Homes

			Level 3, and all market dwellings are encouraged to achieve this standard. Also that market dwellings are encouraged to incorporate the Lifetime Homes Standards so that older people and those with accessibility issues can remain in their established community later in life.
	Concerns that the approach to achieving affordable housing is not justified on the basis that the SPD introduces additional target requirements.	The SPD has been prepared in the context of the adopted Core Strategy particularly Policy SC4 which establishes the principle of ensuring a sufficient supply of affordable homes and an annual target. Both the affordable housing needs and the ability of developments to provide affordable housing are informed by robust evidence base. Therefore specific parts of the SPD have been prepared in the context of the evidence base in order to implement Core Strategy Policy SC4.	No further action required.
	Concerns that the evidence base does not adequately demonstrate that 40% affordable housing on greenfield sites is viable and deliverable.	The Affordable Housing Viability Study is considered a robust evidence base that concludes that greenfield sites can potentially support up to 40% affordable housing. The SPD therefore sets out this provision but acknowledges that the specific proportion of affordable housing will be determined on a site by site basis. The Council therefore accepts that uncomplicated greenfield sites are more likely to support this higher level of affordable housing.	Insert additional text that clarifies that the Council's expectations around higher levels of affordable housing on greenfield sites.
	Request for a greater degree of flexibility around the affordable housing tenure split.	The affordable housing tenure mix is drawn from the 2011 Housing Needs Survey and the Council considers this to be a robust evidence base. Ultimately the affordable housing tenure mix is determined on a site by site basis influenced by factors such as evidence of local affordable housing need and the requirements of registered providers	Insert additional text that clarifies that the Council's expectations around affordable housing tenure mix.



		taking on the affordable dwellings.	
	Paragraph 4.41 - objects to the requirement that on schemes of more than 30 dwellings, on site affordable homes should be completed before the first occupation of more than 40% of the market homes within that same phase, on the basis this may affect deliverability and viability of schemes. Suggests that the affordable dwellings should be completed pro rata in conjunction with the completion of the market housing.	Comments noted.	Amend paragraph 4.41 to address the requirement that affordable dwellings are completed pro rata to the completion of the total market housing dwellings.
	No categorical objective to the principle of seeking to secure some affordable contribution from housing developments that result in a net increase of up to 4 dwellings however concerns raised around the capability of small schemes to deliver these for economic viability reasons.	The Council is aware that the requirement to provide of affordable housing can have a potentially negative impact on scheme viability. On that basis the SPD makes it clear that the Council requires applicants to provide evidence in support of this position.	No further action required.
	Accepts that if a development is to provide less affordable housing than adopted development plan policies require, the onus is on developers to demonstrate that such provision is not viable, through the submission of a financial viability appraisal.	Comments noted.	No further action required.
	Accepts that in circumstances where the Council does not agree with such an appraisal it will commission an independent review of the evidence by a chartered surveyor.	Comments noted.	No further action required.
	Paragraph 7.13 – objection to the requirement for commuted sum monies to be paid on commencement of the development on the basis this would put an excessive burden on the developer at a period within the development programme when costs far exceed incomes. Suggestion that payment is phased in terms of completions or sales of dwellings.	Comments noted.	Amend paragraph 7.13 to make it clear the Council may agree to flexible financial contribution payments where cash flow is an issue and sufficient evidence is provided in support of this.

	Appendix 5 - points out that the HCA Development Appraisal Tool is a commonly used and acceptable model to use for the purposes of assessing economic viability.	Comments noted.	No further action required.
HOW Planning (Chris Sinton) on behalf of Taylor Wimpey UK Ltd	Paragraph 2.1 – supportive of retaining a housing target of 400 new houses per annum on the basis that despite being in the process of being abolished, the RSS still forms part of the Development Plan therefore the housing targets set are based on the most up to date credible evidence base. However this target should be treated as a minimum.	Comments noted.	No further action required.
	Paragraph 2.3 – considers that the Council should also plan for an additional 20% buffer above its annual housing target in accordance with the National Planning Policy Framework due to persistent under delivery of housing since 2003/04.	The Council intends to address a 5% buffer based on a successful longer term record of housing delivery prior to the current downturn in activity. The average number of annual dwelling completions over the previous 20 years has been 400 dwellings.	No further action required.
	Paragraph 3.9 – the Council should be flexible in terms of the range of housing provided.	Table 3 of the SPD seeks to summarise the dwelling types and sizes that are required in the district sub areas. This data is drawn from the 2011 Housing Needs Survey and the Council considers this to be a robust evidence base. Ultimately the dwelling mix is determined on a site by site basis with evidence of local housing need providing important local context and informing the preparation of planning applications.	Insert text that clarifies that the Council expects dwelling mix to be determined on a site by site basis with evidence of local housing providing important local context and informing the preparation of planning applications.
	Paragraph 3.11 – concerns raised around the financial implications of the required levels of the Code for Sustainable Homes.	Comments noted.	Insert text that clarifies that all affordable dwellings must meet Code for Sustainable Homes Level 3, and all market dwellings are encouraged to achieve this standard.
	Paragraphs 4.12 to 4.15 - concerns raised around the SPD being too prescriptive in its overall affordable housing requirements, particularly the requirement for 40% affordable housing on greenfield sites.	The affordable housing requirements are informed by the Affordable Housing Viability Study which is considered a robust evidence base. Based on the site appraisals the Study concludes that development schemes in the district are capable of supporting the levels of affordable housing detailed	No further action required.

		in the SPD. In the case of greenfield sites, the SPD sets out the expectation of 40% affordable housing but the specific proportion will be determined on a site by site basis.	
	Suggests that the SPD appropriately balance affordable housing requirements against the need to test the viability of housing schemes on a site by site basis in accordance with the National Planning Policy Framework.	The Council is aware that the requirement to provide of affordable housing can have a potentially negative impact on scheme viability. On that basis the SPD makes it clear that the Council requires applicants to provide evidence in support of this position.	No further action required.
	Highlights that the Core Strategy policy of 'Urban Concentration' is currently under revision through preparation of the Land Allocation DPD which proposes allocating large scale greenfield sites for housing. However it considered premature to adopt an SPD ahead of the DPD as there is a serious risk that its requirements will have a cumulative impact and jeopardise implementation of the Local Plan.	The emerging Local Plan (currently at draft preferred options stage) proposes the allocation of greenfield sites for residential development. The SPD has been prepared in the context of the adopted Core Strategy particularly Policy SC4 and will be reviewed following adoption of the new Local Plan, anticipated for late 2014.	Insert additional text that clarifies this position.
	Concerns raised around the impact of affordable housing, affordable tenure mix, design, phasing and integration requirements on viability. Therefore a more flexible approach is required.	The Council is aware that factors such as the affordable tenure mix, design, phasing and integration can have a potentially negative impact on scheme viability. They should be addressed as per the SPD but in some cases will need to be addressed on a site by site basis.	Insert additional text that clarifies this position.
	Supportive of the approach to Affordable Housing Statements and Section 106 Legal Agreement clauses in principle, however flexibility should however be provided in the SPD to enable applicants at the outline stage to fix the percentage of affordable housing and tenure mix.	Outline applications need to identify the housing need for the specific location based on the 2011 Housing Needs Survey.  Applicants should assume 30% affordable housing provision on site unless they can prove that this level will be unviable. In such cases, applicants should demonstrate what level of provision is viable.  Applicants should also assume a 50:50 affordable tenure mix.  Applicants should also liaise with appropriate registered providers to establish the type of affordable dwellings they would take on.	Insert additional text that clarifies this position.

	Supportive of the use of confidential financial viability appraisals as part of the outline planning application process, however the calculation of the profit margin needs corrected.	The Financial Viability Appraisal template is a suggested format and it is accepted that developers will provide such evidence in a range of formats.	Insert additional text that clarifies this position.
Barton Willmore (on behalf of Story Homes)	Points out that the National Planning Policy Framework defines SPDs as capable of being material considerations in planning decisions, but not part of the Development Plan.	Comments noted.	No further action required.
	Concerns raised around the Council's adopted housing requirement of 400 dwellings per annum being based on outdated 1996 DCLG household projections.	The 400 dwelling per annum is rooted in the 1996 DCLG Household Projections. However that was only one element of the arithmetic that informed the figure in the Regional Strategy, which was also informed by consideration of economic growth predictions. The 400 dwellings figure has had the benefit of two independent examinations through the preparation of the Regional Strategy and Core Strategy. Thus the extent of the requirement, contained within two adopted Development Plan Documents, is considered to be robust.	No further action required.
	Paragraph 1.14 – the Council should undertake a full, “objective assessment” of need for both market and affordable housing and review their plans in line with National Planning Policy Framework.	The 2011 Housing Needs Survey is a full, “objective assessment” of need for both market and affordable housing.	No further action required.
	Housing requirement should be based on the most recent population and household projections published by the ONS and DCLG, which have not been considered by the Core Strategy housing target.	The 400 dwelling per annum is rooted in the 1996 DCLG Household Projections. However that was only one element of the arithmetic that informed the figure in the Regional Strategy, which was also informed by consideration of economic growth predictions. The 400 dwellings figure has had the benefit of two independent examinations through the preparation of the Regional Strategy and Core Strategy. Thus the extent of the requirement, contained within two adopted Development Plan Documents, is considered to be robust.	No further action required.

	<p>The POPGROUP demographic model (forecasts population, households and the labour force) shows that growth in households represents a 75% increase from the Council's adopted housing target (400 dwellings per annum), and a 17% rise from the 2008 based CLG household projection. Therefore that the Council's housing target is inadequate in the context of the National Planning Policy Framework's requirements to meet demographic projections.</p>	<p>The 400 dwelling per annum is rooted in the 1996 DCLG Household Projections. However that was only one element of the arithmetic that informed the figure in the Regional Strategy, which was also informed by consideration of economic growth predictions. The 400 dwellings figure has had the benefit of two independent examinations through the preparation of the Regional Strategy and Core Strategy. Thus the extent of the requirement, contained within two adopted Development Plan Documents, is considered to be robust.</p>	<p>No further action required.</p>
	<p>It is considered that in meeting the requirements of the NPPF there would be a requirement for at least 700 new dwellings per annum (2011 to 2031).</p>	<p>The 400 dwelling per annum is rooted in the 1996 DCLG Household Projections. However that was only one element of the arithmetic that informed the figure in the Regional Strategy, which was also informed by consideration of economic growth predictions. The 400 dwellings figure has had the benefit of two independent examinations through the preparation of the Regional Strategy and Core Strategy. Thus the extent of the requirement, contained within two adopted Development Plan Documents, is considered to be robust.</p>	<p>No further action required.</p>
	<p>Paragraph 2.2 - the overwhelming restriction on supply in Lancaster relates to the lack of land releases, therefore the Council must release more land in more locations, to enable developers to access a range of sites in a range of locations.</p>	<p>The emerging Local Plan (currently at draft preferred options stage) proposes the allocation of greenfield sites for residential development. This will increase the range of sites and locations.</p>	<p>No further action required.</p>
	<p>The SPD should address the NPPF requirement to plan for a wide choice of high quality homes to create mixed communities.</p>	<p>The SPD provides guidance on the location, type, size, and tenure of new homes informed by the 2011 Housing Needs Survey.</p>	<p>No further action required.</p>

	<p>Paragraph 3.11 - concerns around the Code for Sustainable Home requirements on the basis that the Code is a non mandatory and local authorities can choose whether they wish to adopt such standards into their Local Plans. Concerns around the financial implications of attaining specific levels of the Code for Sustainable Homes.</p>	<p>Comments noted.</p>	<p>Insert text that clarifies that all affordable dwellings must meet Code for Sustainable Homes Level 3, and all market dwellings are encouraged to achieve this standard.</p>
	<p>Concerns around the need for increased levels of market housing in order to meet the affordable housing need.</p>	<p>The Councils recognises that the majority of affordable housing is delivered via developers on market housing schemes, or via registered providers funded by the Homes and Communities Agency.</p>	<p>No further action required.</p>
	<p>Paragraph 4.15 - concerns raised around the requirement for 40% affordable housing on greenfield sites on the basis this is not set out in the Core Strategy.</p>	<p>The Council considers the provisions of the SPD to be derived from the adopted Core Strategy. The affordable housing provisions in particular are derived from Core Strategy Policy SC4 and informed by the current evidence base. Therefore the SPD seeks to support implementation of this policy with regard to this evidence base that concludes that greenfield sites can potentially support up to 40% affordable housing. The SPD details this requirement acknowledges that the specific proportion of affordable housing will be determined on a site by site basis.</p>	<p>No further action required.</p>
	<p>Concerns around the Council relying on the Housing Needs Survey to set an increased requirement for affordable housing whilst ignoring the need for increased levels of market housing detailed in the same evidence base.</p>	<p>The affordable housing requirements are informed by the Affordable Housing Viability Study not the Housing Needs Survey.</p>	<p>No further action required.</p>
	<p>Concerns around the absence of the CIL viability appraisals in relation to affordable housing provision and deliverability on key sites.</p>	<p>The Council has undertaken CIL viability testing and will shortly be reporting on the outcome of this work. The requirement for affordable housing provision has been built into the testing.</p>	<p>No further action required.</p>

	Concerns raised around the SPD not referencing other developer contributions such as education, public open space, play equipment etc.	Comments noted.	Insert additional text that references other developer contributions.
McAteer Associates Ltd (on behalf of Miller Homes)	Paragraph 2.5 – needs corrected re. the abolition of Regional Spatial Strategies.	Comments noted.	Amend paragraph 2.5.
	Paragraph 2.8 – should refer to the fact that in only one year since 2003/4 has the annual requirement of 400 dwellings been met, as in such circumstances the National Planning Policy Framework requires local planning authorities to provide a 20% buffer. Therefore the annual requirement should therefore be increased to 440 dwellings to make up for the shortfall.	The Council intends to address a 5% buffer based on a successful longer term record of housing delivery prior to the current downturn in activity. The average number of annual dwelling completions over the previous 20 years has been 400 dwellings.	No further action required.
	Paragraphs 3.4 to 3.9 - it is inappropriate for the Council to seek to influence the type of housing provided other than to require an appropriate mix as set out in the National Planning Policy Framework.	The 2011 Housing Needs Survey details the housing needs of Lancaster District and the SPD has been prepared in this context. This reflects the National Planning Policy Framework requirement to identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.	No further action required.
	Paragraph 3.11 - the Growth and Infrastructure Bill and the latest Government advice points to the removal of obstacles to development therefore the requirements around the Code for Sustainable Homes should reflect this.	Comments noted.	Insert text that clarifies that all affordable dwellings must meet Code for Sustainable Homes Level 3, and all market dwellings are encouraged to achieve this standard.
	Paragraphs 4.14 & 4.15 – supportive of the desire to ensure an element of affordable housing is provided in appropriate developments, but do not consider that there is any justification for greenfield sites to have a starting position of a requirement for 40%.	The Affordable Housing Viability Study concludes that greenfield sites can potentially support up to 40% affordable housing. The SPD therefore sets out this provision but acknowledges that the specific proportion of affordable housing will be determined on a site by site basis.	No further action required.

	Paragraphs 4.36 to 40 – supportive of the acceptance that the need to provide affordable housing should not render a scheme unviable, and that the most appropriate basis for this assessment is by a financial viability appraisal. However the applicant should not meet the cost if the Council decide to seek independent advice.	The Council will only seek independent advice on a financial viability appraisal if it disagrees with the developers position that the affordable housing provision compromises scheme viability. Therefore it is justified that the developer should meet this cost as part of the planning application process.	No further action required.
	Paragraph 4.41 - objection to the arbitrary phasing proposed by the Council as there is no basis for what is proposed.	Comments noted.	Amend paragraph 4.41 to address the requirement that affordable dwellings are completed pro rata to the completion of the total market housing dwellings.
	Paragraph 7.4 – disagree that failure to provide an Affordable Housing Statement should be a reason to invalidate an application on the basis that affordable housing provision involves negotiation which will take place during the processing of the application.	The Council requires all planning applications for residential development to include an Affordable Housing Statement that sets out how the development will address the issue of affordable housing. Statements can be reviewed and updated accordingly as negotiations take place during the processing of the application.	Insert additional text that acknowledges that Affordable Housing Statements may be reviewed and updated accordingly as negotiations take place during the processing of planning applications.
Signet Planning (on behalf of Satnam Group)	Paragraph 3.6 – suggestion that this should cross-reference with paragraph 4.6 of the SPD and Annex 2 of the NPPF March 2012.	Comments noted.	Insert additional text to cross reference paragraphs on low cost market housing and discounted market housing with Annex 2 of the National Planning Policy Framework.
	Paragraph 3.6 - raises the importance of recognising that low cost market housing plays an important role at the lower end of the scale and can reduce the need for affordable housing, and enable many first time buyers to purchase their first home.	Comments noted.	Insert additional text to acknowledge that low cost market housing can reduce the need for affordable housing, and enable many first time buyers to purchase their first home.
	Paragraph 3.6 – should recognise that discounted sale housing offers an in perpetuity clause in relation to recycling and subsidy created by the home reduction.	Comments noted.	Insert additional text to clarify that the discount applies to the first purchase and all subsequent purchases of discounted



			sale homes. These homes remain affordable in perpetuity unless the vendor can prove that an eligible purchaser has not come forward within 6 months of the home being put up for sale and the criteria would be lifted.
	Paragraph 3.9 (Table 3) – concerns raised around the SPD being too prescriptive and therefore preventing the market determining the most appropriate form of market provision in any given locality.	Table 3 of the SPD seeks to summarise the dwelling types and sizes that are required in the district sub areas. This data is drawn from the 2011 Housing Needs Survey and the Council considers this to be a robust evidence base. Ultimately the dwelling mix is determined on a site by site basis with evidence of local housing need providing important local context and informing the preparation of planning applications.	Insert text that clarifies that the Council expects dwelling mix to be determined on a site by site basis with evidence of local housing providing important local context and informing the preparation of planning applications.
	Paragraph 3.11 – an SPD should not set out that dwellings will be required to meet specific levels of the Code for Sustainable Homes.	Comments noted.	Insert text that clarifies that all affordable dwellings must meet Code for Sustainable Homes Level 3, and all market dwellings are encouraged to achieve this standard.
	Paragraph 4.15 – the Core Strategy sets out a 30% affordable housing target and revision to that target should not be sought through an SPD.	The Council considers the provisions of the SPD to be derived from the adopted Core Strategy. The affordable housing provisions in particular are derived from Core Strategy Policy SC4 and informed by the current evidence base. Therefore the SPD seeks to support implementation of this policy with regard to this evidence base.	No further action required.
	Paragraphs 4.36 to 4.40 – welcomes the provision of general guidance on financial viability appraisals.	Comments noted.	No further action required.

The Planning Bureau (on behalf of McCarthy and Stone Retirement Lifestyles Ltd)	Commends the SPD's positively approach to the projected rise in the elderly population within the district.	Comments noted.	No further action required.
	Concerns raised around solutions to an ageing population being limited to a requirement for all housing to be built to Lifetimes Homes Standard when there are other solutions available.	Comments noted.	Insert text that refers to other accommodations solutions to meet the needs of older people.
	Suggestion that the Council explore the various other forms of specialist accommodation for the elderly.	The Council intends to explore the option for accommodation for older people through the preparation of an Older Person's Housing Strategy.	Insert text to clarify this position.
Garner Planning Associates	Affordable housing should be addressed in a DPD as envisaged by the Core Strategy Inspector and as required by the National Planning Policy Framework.	The SPD has also been prepared in the context of the adopted Core Strategy. Following the adoption of the emerging Lancaster District Local Plan the SPD will be subject to revisions.	
	Concerns around the consultation process being more presentation than consultation.	The Draft SPD has been subject to a comprehensive consultation process carried out in accordance with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's Statement of Community Involvement.	No further action required.
	Concerns around the robustness of the evidence base on affordable housing viability.	The Council is satisfied that the Affordable Housing Viability Study was carried out to a robust and proven methodology that will stand up to examination.	No further action required.
	Points out that the low level of dwelling completions is due to the Council not reacting to the economic situation and seeking to stimulate new development by amending affordable housing thresholds.	The Affordable Housing Viability Study was carried out in 2009 and 2010 and therefore in the context of the state of the UK housing market following the sub-prime mortgage crisis in the USA. The affordable housing provisions in the SPD have therefore been developed in this economic context and do not seek to reduce residential development. Where the requirement to provide affordable housing has a potentially negative impact on scheme viability the Council requests applicants to provide evidence in support of this position.	No further action required.

	Queries whether the Code for Sustainable Homes requirements been viability tested.	Comments noted.	Insert text that clarifies that all affordable dwellings must meet Code for Sustainable Homes Level 3, and all market dwellings are encouraged to achieve this standard.
	Queries the evidence that there is a need for more small dwellings.	The housing needs for Lancaster District are detailed in the 2011 Housing Needs Survey and the SPD has been prepared in the context of these needs.	No further action required.
	Points out that developers may resist signing a S106 agreement where the affordable housing contribution is not specified.	The on site affordable housing contribution is always specified in the Section 106 agreement.	No further action required.
	Considers it onerous to require affordable housing contributions to be made prior to commencement due to the detrimental impact on cash flow and development viability.	Comments noted.	Amend paragraph 7.13 to make it clear the Council may agree to flexible financial contribution payments where cash flow is an issue and sufficient evidence is provided in support of this.
Thomas Associates Architects	SPD is a clear but lengthy document with a controlling approach.	Comments noted.	No further action required.
	Terminology and language difficult for non planners to understand.	Comments noted.	No further action required.
	Concerned that factors such as demand and viability are not always possible to control and the outcome of the SPD is likely to be over bearing and result in cumbersome approach lacking direct accountability.	Comments noted.	No further action required.
	Commuted sums viewed as revenue and shouldn't be part of the planning process.	Financial contributions towards affordable housing are an alternative to providing on site affordable housing in development scenarios (i.e. small schemes) where on site provision would not be practical	No further action required.

Harrison Pitt Architects	Does not generally support the SPD on the basis that it places too many restrictions on a currently suppressed housing market. Whilst supportive of affordable housing, the requirement is likely to deter developers in the current economic climate.	Comments noted.	No further action required.
	Concerns around the length of the SPD, when it should be more concise.	Comments noted.	No further action required.
	Not supportive of the approach to calculating financial contributions from smaller developments as this will deter small developments and conversions that contribute to the local economy and ease under occupation.	The Affordable Housing Viability Study shows that scheme size does not determine viability and therefore smaller sites are no more or less viable than larger ones. Hence there is no viability reason why smaller sites should not make an appropriate, carefully judged, financial contribution towards affordable housing. The Council has secured over £75,000 of commuted sums through unilateral undertakings on smaller schemes, with 12 separate contributions paid so far, totaling over £37,000.	No further action required.
	Supportive of the consideration if financial viability and each site should be considered on its own merits.	Comments noted.	No further action required.
	The definition of key services in a rural context should be widened and should include public houses.	The Council recognises that a local service, whether a key service (as per Core Strategy Policy SC3) or another that is equally valued by the local community can play an important part in the maintaining or enhancing the vitality of communities living in rural settlements.	No further action required.
	Support for encouraging new development such as market housing for families to sustain existing services such as schools.	Comments noted.	No further action required.

	Support for the Unilateral Undertaking template and request that it be made available in Word format for use by applicants.	The inclusion of the Unilateral Undertaking template seeks to inform applicants of the basic clauses, however the draft Unilateral Undertaking will first be prepared by the Council's Legal Services before being provided to the applicant's appointed legal representatives.	No further action required.
	Request that the number of registered providers that applicants should contact regarding purchasing affordable housing units should be reduced to 3 on the basis that it can be difficult to obtain responses from them.	The SPD seeks to ensure that developers approach as many registered providers as possible to ensure that affordable units are purchased. Where registered providers do not respond then developers are required to evidence this.	No further action required.
Great Places	Paragraph 4.28 - size, type and tenure of affordable housing should be determined on a site by site basis to ensure affordable provision meets the demands/ needs of the local community.	The affordable housing tenure mix is informed by the 2011 Housing Needs Survey. Ultimately the mix is determined on a site by site basis influenced by factors such as evidence of local affordable housing need and the requirements of registered providers taking on the affordable dwellings.	Insert additional text that clarifies that the Council's expectations around affordable housing tenure mix.
	Paragraph 4.32 – supportive of achieving HCA compliance to ensure size of bedrooms does not lead to future issues as a result of welfare reform but standards should reflect what is current at the time of delivery.	Comments noted.	Insert additional text that clarifies that affordable housing units should comply with the current HCA standards at the time of delivery.
	Suggestion that the SPD should consider overall running costs of affordable housing (estate management, service charges and ground rent) as these can impact on outgoings particularly in light of proposed changes to housing benefit.	Comments noted, however these considerations are outside the scope of this SPD.	No further action required.
Natural England	Welcomes the opportunity to comment, however the SPD does not significantly relate to the remit of Natural England.	Comments noted.	No further action required.
Arnside & Silverdale AONB	In principle support for the SPD and the approach to meeting housing needs.	Comments noted.	No further action required.

Partnership	Request that correct full name of the designated area is used (Arnside and Silverdale AONB).	Comments noted.	Amend text.
	Suggestion that the definition of an AONB is amended to emphasise the <i>national</i> landscape and environmental importance of AONBs and that the statutory purpose of AONBs is referred to.	Comments noted.	Amend text.
	Request that the SPD should include additional information relating to proposals within AONBs and identifying the key considerations as set out in the National Planning Policy Framework.	Comments noted.	Insert additional text that clarifies the Council's position in relation to proposals within the AONB.
National Trust	In principle support for the preparation of the SPD and its broad scope and approach to meeting housing needs.	Comments noted.	No further action required.
	Recognition that the subject area is complex and therefore non-planners may find it difficult to read the SPD.	Comments noted.	No further action required.
	Paragraph 4.53 – support for the approach to accommodation for rural enterprise workers, however more clarity is required around the approving accommodation that meet the necessary financial functions test.	Comments noted.	Insert additional text that clarifies the Council's position on proposals for rural enterprise worker accommodation and the necessary functional test.
	Paragraph 5.5 – no reference to AONBs or their relevance to the SPD outside of the Glossary. Suggestion for additional text relating to the considerations specific to proposals in AONBs and identifying the key considerations as set out in the National Planning Policy Framework.	Comments noted.	Insert additional text that clarifies the Council's position in relation to proposals within the AONB.
United Utilities PLC	Suggestion that development management policies should consider the impact on community health and well-being its community and the environment; and ensure that infrastructure capacity is available.	Comments noted, however this is outside of the intended scope of the SPD.	No further action required.

	Suggestion that where infrastructure deficiencies cannot be addressed, alternative locations and/or timescale are sought where infrastructure capacity is available and development needs are met.	Comments noted, however this is outside of the intended scope of the SPD.	No further action required.
	Request that planning application processes protect and secure land for infrastructure use, to ensure that United Utilities PLC can provide the additional capacity required to support development.	Comments noted, however this is outside of the intended scope of the SPD.	No further action required.
	Request that the planning application process requires applicants to demonstrate the availability of infrastructure capacity.	Comments noted, however this is outside of the intended scope of the SPD.	No further action required.
	Concerns around the SPD key objectives being too generic.	Comments noted.	Insert additional text to provide greater detail of the SPD objectives.
	Queries how the Council will address affordable housing need in light of Government's recent announcement to remove the affordable housing requirement from schemes that are stalled due to sites being commercially unviable.	The SPD makes it clear that the Council requires applicants to provide supporting evidence where there are concerns around the impact of affordable housing provision on viability.	Insert additional text to clarify the Council's position regarding requests to remove the affordable housing requirement from previously negotiated schemes.
	Query around how the 2011 census data has been considered in relation to housing need.	The 2011 Housing Needs Study uses household numbers sourced from Council Tax data to assess housing need rather than population numbers. When the household numbers from the 2011 Census are released the difference this will make is likely to be minute.	No further action required.
	Paragraph 3.11 – queries how the forthcoming changes to Code for Sustainable Homes levels will this be managed and enforced, and this will be managed for development phased over the over the longer term.	Comments noted.	Insert text that clarifies that all affordable dwellings must meet Code for Sustainable Homes Level 3, and all market dwellings are encouraged to achieve this standard.

	Request that in the future a pdf Comments Form is avoided.	Comments noted.	No further action required.
Network Rail	No definitive comments on the locations for proposed new development in the absence of locations plans. However, raises the issue of growth areas or significant housing allocations close to existing rail infrastructure will require an assessment of the potential impacts.	Comments noted, however this is outside of the intended scope of the SPD.	No further action required.
	Suggestion that the SPD include provisions to ensure that developer contributions can deliver appropriate improvements to the rail network.	Comments noted, however this is outside of the intended scope of the SPD.	No further action required.
	A concern raised around the SPD does not mention the potential impact upon level crossings caused by new development, and that this should be mitigated.	Comments noted, however this is outside of the intended scope of the SPD.	No further action required.
Highways Agency	Satisfied with the content of the SPD therefore no additional comments provided.	Comments noted.	No further action required.
Lancashire County Council	Concerns raised around increasing birth rates and housing developments causing increasing pressure on the availability of school places in the context of local authority and school budgets being cut. Therefore the Council will need to work in partnership with Lancashire County Council to secure education contributions which can be offset against the shrinking basic need funding received from Government.	Comments noted.	No further action required.
Wyre District Council	Page 6 – Definition of greenfield, should read “Greenfield land is often but not exclusively characterised by open countryside...”	Comments noted.	Amend text.
	Paragraph 5.7 – reference to Table 7 needs corrected.	Comments noted.	Amend text.
	Paragraph 5.18 – final sentence needs corrected.	Comments noted.	Amend text.
Hornby-with-Farleton Parish Council	Believe there is still a need for affordable housing in the parish, although clarity is required on what constitutes affordable housing.	The definition of affordable housing is set out in the SPD glossary.	No further action required.



	Concerned that affordable housing does not remain affordable in perpetuity.	<p>The affordable housing definition requires affordable housing to include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <p>In the case of discounted sale housing, the initial discount applies to the first occupant and all subsequent occupants. Therefore these homes remain affordable in perpetuity. Discounted market homes are available for purchase according to an eligibility criteria agreed between the Council and the developer as part of the planning process (the criteria may differ slightly for each housing schemes). There are circumstances where the vendor of a discounted market home will apply to the Council to have the affordable eligibility criteria lifted if they have been unable to find a buyer for the dwelling after 6 months. In such cases the discount on the dwelling still applies and the eligibility criteria will be applied to the next sale of the dwelling.</p>	.
David Alexander	Broadly supportive of the SPD as it usefully sets out the position on meeting local housing needs.	Comments noted.	No further action required.
	SPD is generally easy to read and understand, although concern that Chapter 4 is harder to grasp. Suggestion that local case studies might help.	Comments noted.	No further action required.
	SPD should include details of the timescale of negotiations and the range of problems and issues.	Comments noted.	No further action required.
	SPD should refer to Clause 5 of the Growth and Infrastructure Bill, covering affordable housing provision.	The Council agrees that the SPD should make reference to Clause 5 of the Growth and Infrastructure Bill which relates to the modification or discharge of affordable housing requirements.	Insert text to clarify the position in relation to Clause 5 of the Growth and Infrastructure Bill which relates to the modification or discharge of affordable housing requirements.
	The glossary is useful, but a clearer link between the Localism Act and Neighbourhood Planning would assist.	Comments noted.	Insert text to clarify the link between the Localism Act and Neighbourhood Planning.

	Concern that the Core Strategy is over 5 years old and that an update would be worthwhile.	The Council is revising the housing delivery elements of the adopted Core Strategy through the preparation of the new Local Plan.	No further action required.
	Notes that there are still uncertainties around the forthcoming Growth and Infrastructure Bill.	Comments noted.	No further action required.
	Paragraph 1.18 – needs corrected.	Comments noted.	Amend paragraph 1.18.
	Paragraph 2.1 – Concern that the 7,200 housing figure is no longer valid.	Comments noted.	No further action required.
	Concerned that housing needs surveys are largely aspirational in an ideal world, with many people willing to consider more than a single option of housing type.	The Council considers the 2011 Housing Needs Survey to be a robust evidence base. All data relates to genuine housing need, e.g. a household living in accommodation that is too small or a newly formed household with adequate income to purchase a new home.	No further action required.
	Queries the validity of the district housing need figure and suggests a range of 250 to 300 to be more realistic.	Comments noted.	No further action required.
	Enquires of evidence of local housing needs surveys being any more accurate and helpful.	The Council is aware of parish councils in the district that are gathering evidence of local housing need and this will be considered through the Parish Partnerships Project.	No further action required.
	Paragraph 3.8 - should more be done to tackle under-occupation?	The Council recognises that strategies to reduce under occupation can have a positive impact on the existing housing stock and this will be dealt with through the preparation of an Older Persons Housing Strategy.	No further action required.
	Paragraphs 3.10 and 3.11 – support for the Lifetime Homes Standard and for increasing levels of the Code for Sustainable Homes	Comments noted.	No further action required.
	Paragraph 3.12 - market housing needs can be given a considerable boost by making better use of existing homes and buildings.	The Council recognises that strategies to make maximise the existing housing stock will have a positive impact on meeting housing needs. This will be addressed through the preparation of a Housing Action Plan.	No further action required.

	Concerns around discrepancy between the current annual shortfall of affordable housing completions and Core Strategy target.	Comments noted.	No further action required.
	Paragraph.4.15 – suggests that the 40% affordable housing target for Greenfield sites may discourage the development of Greenfield sites in all but the last resort.	The Affordable Housing Viability Study concludes that greenfield sites can potentially support up to 40% affordable housing. The SPD therefore sets out this provision but acknowledges that the specific proportion of affordable housing will be determined on a site by site basis.	No further action required.
	Queries the rationale for a commuted sum from schemes up to 4 dwellings, and how successful this approach has been to date.	The Affordable Housing Viability Study shows that scheme size does not determine viability and therefore smaller sites are no more or less viable than larger ones. Hence there is no viability reason why smaller sites should not make an appropriate, carefully judged, financial contribution towards affordable housing. The Council has secured over £75,000 of commuted sums through unilateral undertakings on smaller schemes, with 12 separate contributions paid so far, totaling over £37,000.	No further action required.
	Guidance Boxes 4 & 5 - strong support for this approach.	Comments noted.	No further action required.
	Paragraph 4.52 – queries how long the exemption from affordable housing provision will continue in central Morecambe and the West End, and what the mechanism for review will be.	Comments noted.	Insert text to clarify that exemptions will be reviewed through the SPD monitoring arrangements.
	Paragraph 5.4 – supportive of the evidence for rural housing needs, but queries how the Council can influence the sustainability of rural settlements as this can vary considerably across a district, depending on local circumstances.	The Council will take account of sustainability issues through the Parish Partnerships Project as part of the process of identifying housing sites that meet local housing needs through a partnership-led approach.	No further action required.

	Queries raised around the influence of key services on the sustainability of rural settlements and how this is starting to evolve.	The Council recognises that the influence of key services on the sustainability of rural settlements is evolving and this is being dealt with through the preparation of the new Local Plan.	No further action required.
	Queries raised around the extent to which local planning authorities should support rural settlements that are clearly unsustainable in the generally accepted sense of the word.	The Council will take account of sustainability issues through the Parish Partnerships Project as part of the process of identifying housing sites that meet local housing needs through a partnership-led approach.	No further action required.
	Paragraph 5.13 – needs to reflect the Glossary definition for localism and neighbourhood planning.	Comments noted.	Amend glossary and paragraph 5.13.
	Guidance Box 9 – general query around how local authorities judge existing family connections or employment connections, given that these may and do change over time.	Local connection is normally determined by immediate family living in the area, i.e. parents, grandparents, siblings or children. Other criteria are previous or current residence or employment in the area (current or proof of offer of employment). If circumstances change over the longer term then the Council considers tenants to have a local connection by virtue of them living in the location.  For the purposes of intermediate housing schemes supported by the HCA through Plumlife, the income threshold is £60k per annum.	No further action required.
	Paragraph 5.17 – concerns raised over current proposals within Clause 5 of the Growth and Infrastructure Bill, resulting in uncertainty over market housing on exception sites.	The Council agrees that the SPD should make reference to Clause 5 of the Growth and Infrastructure Bill which relates to the modification or discharge of affordable housing requirements.	Insert text to clarify the position in relation to Clause 5 of the Growth and Infrastructure Bill which relates to the modification or discharge of affordable housing requirements.
	Appendix 2 - concerns raised around setting out funding criteria for the Affordable Housing Commuted Sums Fund but also stating that funding requests that do not meet the criteria may also be considered.	The Council recognises that issues such affordable housing needs or external funding arrangements may change in the future and it is therefore important that the Council can respond accordingly.	No further action required.

	Appendix 4 – suggestion that the Affordable Housing templates could be supplemented with some good practice examples.	The Affordable Housing Templates provided are based on good practice examples.	No further action required.
	Appendices 5 & 6 – suggestion that they could be supplemented with some good practice examples.	The Council has considered providing good practice examples, however each development proposal is different and therefore examples are often confusing to applicants.	No further action required.
Christine Quinn	Does not support the SPD because it does not focus on affordable housing provision to enable young people and growing families, and low wage earners to remain living in the district.	Chapter 4 of the SPD provides of details on affordable housing needs. Specific issues such as the housing needs of young people and those on low wages will be dealt with through the preparation of a Housing Action Plan.	No further action required.
	The SPD should focus on development on Brownfield sites and the re use of empty properties, and expediting developments with planning permission with priority given to affordable housing schemes.	The SPD is intended to provide guidance on specific Core Strategy policies and specific issues such development on brownfield sites are dealt with by the Core Strategy and will also be addressed through the preparation of the new Local Plan.	No further action required.
	Concerns around the housing issues of disadvantaged young people and growing families being underrepresented in the SPD.	Chapter 4 of the SPD provides of details on affordable housing needs. Specific issues such as the housing needs of disadvantaged young people and growing families will be dealt with through the preparation of a Housing Action Plan.	No further action required.
	Concerns around there being a shortage of affordable housing for older people and people with disabilities.	The Council intends to explore the options for accommodation for older people through the preparation of an Older Person's Housing Strategy.	Insert text to clarify this position.
Dr Paul Tynan	Concerns around the SPD being difficult to process and the suggestion that public consultation should have included alternative formats.	The Draft SPD has been subject to a comprehensive consultation process carried out in accordance with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's Statement of Community Involvement.	No further action required.
	Support for prioritising brownfield sites over greenfield, and concentrating development in the centre of Lancaster.	Comments noted.	No further action required.

	Concerns raised around congestion on the A6 and in Galgate.	Comments noted.	No further action required.
Simon Gershon	Table 9 – the high number of households with a mobility restriction should influence the location of accommodation for such households, allowing access to open space.	The Council intends to explore the options for accommodation for households with mobility restrictions through the preparation of a Housing Action Plan and an Older Person's Housing Strategy.	Insert text to clarify this position.
	Support for prioritising brownfield sites over greenfield where the former exist. Suggestion that where greenfield sites are developed in urban areas, they should be subject to planning obligations secured via a S106 agreement that would contribute towards remediating contaminated land.	Comments noted, however this is out of the remit of the SPD.	No further action required.
	Suggestion that new homes are made more versatile and adaptable, despite the higher costs involved.	Comments noted.	No further action required.
	Suggestion that cohousing schemes should be encouraged to create strong and resilient communities and make better use of space.	Comments noted. The Council will address proposals for cohousing schemes through the planning process, and recognises that Neighbourhood Planning may encourage more proposals of this nature.	No further action required.
	Suggestion that cost-effective renewable technologies can support on site electricity generation.	Comments noted.	No further action required.
Phil Howden	Supportive of the need for additional housing in the district in particular, affordable housing.	Comments noted.	No further action required.
	Objects to development on greenfield sites, when more suitable brownfield sites in the city have been identified and are available for development.	Comments noted. Issues such development on brownfield sites are dealt with by the Core Strategy and will also be addressed through the preparation of the new Local Plan.	No further action required.

Eric Ollerenshaw MP	Generally supportive of the approach of the SPD, which seeks to identify and meet particular housing needs across the district.	Comments noted.	No further action required.
	Concerns raised around housing need predictions driving solutions and guiding developers when a more flexible approach is required.	Comments noted.	No further action required.
	Extensive consultation is welcomed but there needs to be continuous public consultation around how effectively housing needs are being met.	Comments noted.	No further action required.
	Queries the lack of estimated income from the New Homes Bonus and Right to Buy purchases.	New Homes Bonus monies are not ring fenced for spending on affordable housing. In terms of receipts raised through Right to Buy sales, the housing self financing settlement means that a maximum of 30% of receipts raised from sales are ring fenced to meet the cost of replacement affordable dwellings. The remainder of the receipts are split between the Council to cover amounts reflected in the settlement, the business plan and other costs, and the Government to reflect the income which the Treasury assumed from RTB sales in the settlement. The remainder of the cost of new affordable rented housing (at least 70% of the total scheme costs) would therefore need to be funded from the Council's other resources and/or by a registered provider of social housing.	No further action required.
	Paragraph 3.7 – requires clarification around smaller dwellings meaning fewer bedrooms in rather than smaller amounts of living space.	Comments noted.	Insert text to provide more clarity on paragraph 3.7.
	Supportive of affordable housing being part of market housing developments and on site provision in as many cases as possible.	Comments noted.	No further action required.

	Concerns raised around specific affordable housing targets for specific sized developments as this might deter new development, therefore flexibility is required.	The Council believes it is important to set targets for the delivery of affordable housing so that applicants are clear on what is required of them. The SPD makes it clear that there is a process that applicants should follow where there are concerns around the impact of affordable housing provision on viability.	No further action required.
	Paragraph 4.33 – suggestion of reference to good design, in keeping with the character of surrounding areas.	The design of affordable housing will be dealt with through development management policies.	No further action required.
	Paragraphs 4.36 to 4.40 – concerns around developers buying land and speculating on the increasing values rather than developing.	Comments noted.	No further action required.
	Paragraphs 4.50 to 4.54 – concerns around exemptions to affordable housing being too restrictive.	Comments noted.	No further action required.
	Chapter 5 – supportive of the requirement to increase affordable housing in rural areas, however some concerns around restricting development in rural settlements without key services.	The Council recognises that greater flexibility is required around permitting residential development that meets rural housing need and this is being dealt with through the preparation of the new Local Plan.	No further action required.
	Would like to ensure that the local community is involved at every stage on the basis they are best qualified to say how relevant the approaches to meeting rural housing needs to their settlements.	The Council will take account of community engagement through the Parish Partnerships Project as part of the process of identifying housing sites that meet local housing needs through a partnership-led approach.	No further action required.
	Suggestion that the Council should allocate New Homes Bonus monies to parish councils or local communities in rural settlements where new development happens to mitigate any negative effects of this development.	New Homes Bonus monies and income raised from Right to Buy purchases are not ring fenced and would therefore be subject to a corporate decision on whether they should be allocated to parish councils.	No further action required.



	Chapter 6 – suggests that whilst there might be a need identified for sheltered housing, clarification is required regarding whether this is the type of older persons accommodation required.	The Council intends to explore the options for accommodation for s people through the preparation of an Older Person’s Housing Strategy.	Insert text to clarify this position.
	Suggestion that clarification is required around extending homes to create a ‘granny flat’.	Comments noted.	Insert text to clarify this position.
Cllr Chris Coates, Scotforth West Ward (on behalf of North Lancs Green Party)	Concerns around the population growth data used to calculate the overall housing need for the district representing a significant overestimate compared to the 2011 census data, and therefore the housing needs figures should be revised downwards. Otherwise this will lead to a potential over supply of sites that will hamper the redevelopment of the harder to develop brownfield sites.	The 2011 Housing Needs Study uses household numbers sourced from Council Tax data to assess housing need rather than population numbers. When the household numbers from the 2011 Census are released the difference this will make is likely to be minute.	No further action required.
	Welcomes the focus on affordable housing, but requires more emphasis on designating sites specifically for affordable dwellings, a wider range of affordability products, and all affordable homes to meet level 5 of the Code for Sustainable Homes.	With the exception of exception sites, the designation of land for affordable housing is outside of the scope of the SPD. However the identification and use of Council owned land for affordable housing will be dealt with through the preparation of a Housing Action Plan.	No further action required.
	Concerns that the approach to meeting rural housing needs through allowing development in 8 rural settlements based on sustainability has not met the need for affordable housing for young people in rural areas and therefore more imaginative solutions are required, such as working with parish councils to identify exemption sites; providing land to Community Land Trusts; encouraging development that contributes to the sustainability; developing an SPD on low impact rural.	The Council recognises that greater flexibility is required around permitting residential development that meets rural housing need and this is being dealt with through the preparation of the new Local Plan.	No further action required.

Anne Chapman	Concerns raised around requesting commuted sums from conversions that result in a net increase on the basis this will act as a disincentive to people.	The Affordable Housing Viability Study shows that scheme size does not determine viability and therefore smaller sites are no more or less viable than larger ones. Hence there is no viability reason why smaller sites should not make an appropriate, carefully judged, financial contribution towards affordable housing. However the Council is aware that the affordable housing provision can have a potentially negative impact on scheme viability and on that basis the SPD makes it clear that the Council requires applicants to provide evidence in support of this position.	No further action required.
	Acknowledges that applicants can provide evidence that a commuted sum has a negative impact on viability, but concerned that this requires a reasonable amount of effort.	Comments noted, however the Council has prepared the SPD so that applicants have sufficient guidance on how to demonstrate that affordable housing provision has a negative impact on scheme viability. The Council also provides officer support in terms of preparing evidence in support of this position.	No further action required.
	Suggestion that given the current economic climate this requirement should not apply to conversions, and also development on brownfield land where a negative impact on viability can be proven.	The Affordable Housing Viability Study was prepared in the context of the economic downturn and it shows that scheme size does not determine viability. Therefore smaller sites are no more or less viable than larger ones.	No further action required.
Graham Marsh	A flawed document written to support an agenda rather than truly identify local housing needs.	Comments noted.	No further action required.
	Concerned with robustness and validity of the Housing Needs Survey.	The Council considers the 2011 Housing Needs Survey to be a robust evidence base carried out using a tried and tested methodology by experienced external consultants. The survey captures the genuine housing needs of existing and concealed households and planned household moves. Surveys were posted to 11,500 random households with 2,950 completed and a further 200 face to face interviews conducted to ensure proper representation of hard to reach groups or in areas with high levels of deprivation. This information was supplemented by an on line survey of those	No further action required.

		traveling to the district for work, and a range of other secondary sources such as the Land Registry and Halifax databases, the Housing Register data, the 2001 Census, household & population projections, and an internet survey of estate agents (cost of access level property & supply & cost of PR housing). 5% of all households in the district took part in the survey, which was a 25% response rate ensuring that the sample was statistically valid and representative of the district population.	
	Council should pay more attention to existing stock rather than requiring new development.	The SPD is intended to provide guidance how planning proposals can meet housing needs and encourages the reuse of existing buildings such as empty homes. At any one time there are around 900 properties empty in the district that have been so for a period of 6 months or more. This level of empty properties is typical. Unfortunately empty properties cannot be considered when determining the supply of homes that become available through households moving to new accommodation because the timescale of when and if they will be put up for sale or used for private rent cannot be determined.	
	Concerned that the SPD is linked to policy documents prepared before the National Planning Policy Framework (NPPF) and the Localism Act.	The SPD has also been prepared in the context of the adopted Core Strategy as well as the National Planning Policy Framework (NPPF) and relevant provisions of the Localism Act. Following the adoption of the emerging Lancaster District Local Plan the SPD will be subject to revisions.	No further action required.
	Too many references to other documents which must be read for a full understanding of the SPD.	Comments noted.	No further action required.
	Disagrees that the economic downturn has driven low levels of development, and that low demand is the real reason.	Comments noted.	No further action required.

Cecilia Finnerty	Table 3 - Concerns raised around the need for more detached dwellings in Morecambe and the impact this will have on existing stock, particularly smaller dwellings.	Comments noted.	No further action required.
	Paragraph 4.10 - Acceptance of the principle of a commuted sum, but concerns around applying it to smaller developments, especially conversions of empty properties as it may disincentive smaller developers.	The Affordable Housing Viability Study shows that scheme size does not determine viability and therefore smaller sites are no more or less viable than larger ones. Hence there is no viability reason why smaller sites should not make an appropriate, carefully judged, financial contribution towards affordable housing.	No further action required.
	Paragraph 4.16 - Reference to paragraph 6.21 needs amended. Clarity required on what will occur if the developer cannot secure a registered provider to purchase a single affordable dwelling.	The SPD seeks to ensure that developers approach as many registered providers as possible to ensure that affordable units are purchased. It is considered to be unlikely that a developer will not be able to secure a registered provider providing follow the SPD provisions in a timely fashion.	No further action required.
	Paragraph 4.17 - Replace "Should" with "Must", include penalty form failure to comply. Concerns around alternative sites may have a preponderance of affordable housing.	Comments noted.	Insert text to provide more clarity on paragraph 4.17.
	Paragraph 4.19 - Ceiling of 45% affordable housing on any one site and that a commuted sum be paid for the remainder.	Comments noted.	Insert text to provide more clarify on paragraph 4.19.
	Paragraph 4.35 - Stronger wording to ensure clarity.	Comments noted.	Insert text to provide more clarity on paragraph 4.45.
	Paragraph 4.52 - Requires clearer indication of the type of dwelling that developers are expected to provide in Morecambe. Remove requirement of developers to provide evidence of viability issues in Morecambe.	Table 3 provides of a summary of the dwelling types and sizes required in the district sub areas, including Morecambe. This data is drawn from the 2011 Housing Needs Survey	No further action required.
	Chapter 5 - Agree with need to address rural housing needs but must ensure key services support increased populations.	Comments noted.	No further action required.

Ruth Haigh	Generally supportive of the Meeting Housing Needs SPD.	Comments noted.	No further action required.
	Supportive of encouraging developers to make use of existing building particularly empty homes to increase the supply of homes.	The Council recognises that strategies to make maximise the existing housing stock will have a positive impact on meeting housing needs. This will be addressed through the preparation of a Housing Action Plan.	No further action required.
	Supportive of there being Code for Sustainable Homes minimum standards, and of the requirement for Lifetime Homes.	Comments noted.	No further action required.
	Supportive of consideration of the needs of older people and people with disabilities.	Comments noted.	No further action required.