

Housing Affordability SPD summary of consultation comments

Draft Housing Affordability Supplementary Planning Document Consultation under regulations 11 to 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012

The consultation ran from **16 June until 28 July 2023**. A total of **28 representations** were received and the summary of comments can be found below.

Representations	Number	Support	Object	No Comment	General Comment	Summary of Comments	Officer comments / changes to SPD
Statutory Consultees							
<i>Warren Lever (Hampshire CC)</i>	HASPD22	✓				<p>Support its key aims and ambitions. and express the support for this policy work from the Public Health Team.</p> <p>We show support for its aims to create a clear approach for affordable housing through the plan led system.. This SPD will provide a clear framework for affordable housing provision on the Island.</p> <p>where possible affordable housing measures are targeted to assist those in areas of the greatest need and provide a much-needed step towards housing security.</p> <p>We understand that housing quality and design is possibly covered in other policies and documents but the aim for tenure blind design of both.</p>	Comments noted

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						While this SPD focuses on provision, we would suggest there is always a benefit to reiterating these aims as part of an affordable housing SPD.	
<i>Jonathan Shavelar – Natural England</i>	HASPD24	✓		✓		No detailed comments to make and agree with the conclusion of the Draft ES.	Comments noted
<i>Guy Robinson – Historic England</i>	HASPD27			✓		We do not consider it necessary for Historic England to provide detailed comments on this SPD at this time.	Comments noted
Parish/Town Councils							
<i>Cllr Brodie (IOW Councillor and Community councillor for Pan and Barton)</i>	HASPD9				✓	<p>Considers section 3 to be clear and agrees with the listed data sources. Also agrees the document is easy to read.</p> <p>The ratios preferred are 5-10% First Homes, 80% of the total social/affordable rent and 10-15% other affordable tenures. Also believes that even with a 30% discount on 'First Homes' would not address the housing needs due to the median annual income being not enough to be able to purchase.</p> <p>Expresses that we should build council housing which we have permission from the budget from 2022 to do. And agrees that any first homes on the island should</p>	<p>Comments noted</p> <p>80/20 split is proposed in guidance point AH2 – the 20% split can be flexible in terms of what proportion of First homes may or may not form part of that 20%. The potential for deeper discounts on First Homes can be assessed through emerging local plan (including viability assessment).</p> <p>Comments noted but outside the scope of the SPD in relation to the council as landowner building homes.</p>

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						be discounted by a minimum of 30% against the market value	
<i>Northwood Parish Council</i>	HASPD18	✓				Support the document	Comments noted
<i>Fishbourne Parish Council</i>	HASPD19	✓				<p>General support but The Council must ensure that it can deliver off site affordable housing. Why has Social and affordable housing been lumped together.</p> <p>What effect will first time homes have on the wider viability?</p> <p>Use Brownfield land to enable construction.</p> <p>Developers should pay for viability assessments.</p>	<p>There is no distinction between social and affordable housing in the NPPF definition or the Core Strategy, and this SPD cannot override the NPPF or adopted local plan policy.</p> <p>First Homes no longer a requirement but optional for schemes given potential impacts on viability.</p> <p>Affordable Housing Contributions SPD (para 3.30) already requires developers to pay for any AH viability assessments undertaken by the LPA.</p>
<i>Shalfleet Parish Council</i>	HASPD20				✓	In the SEA it states 'under Characteristics of the effects of the area likely to be affected, it states several times that 'there are no effects'. It is felt that this is inaccurate and would override what matters to people.	In Table 6.1 of the SEA, where ' <i>There are no effects</i> ' is listed against 'Characteristics of the effects and of the area likely to be affected' (a) to (d) and (f) to (g), this relates to the fact that the SPD is not introducing new policy that will either increase/decrease the amount of AH required from development or change the locations that any AH would be considered policy compliant. The SEA focuses solely on the effects of the SPD, not existing adopted policy.
<i>East Cowes Town Council</i>	HASPD26		✓			The document doesn't clearly explain that it sits alongside other SPD's that relate to affordable housing as both have relevance to DM4	Reference added in para 1.3 to the Affordable Housing Contributions SPD

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					<p>In figure 1 it should read "Submission of a planning application"</p> <p>In step 2 the stages are the wrong way round and Discharge of pre-commencement conditions. Should be added as a stage.</p> <p>The document implies an actual requirement of affordable housing will be required, which goes significantly beyond the NPPF.</p> <p>If the IW Council wants to require developers to use its pre-application service, they really need to check whether this can be made compulsory within existing planning law.</p> <p>Will the IOW council support T&P Councils with their housing needs surveys? And how much would the surveys be rely on?</p> <p>It is clear from the wording within this new SPD that we won't have a new Island Planning Strategy until at least the forthcoming changes to the National Planning Policy Framework are released.</p>	<p>Figure 1 adjusted accordingly to better reflect the stages of the process.</p> <p>Figure 1 adjusted accordingly to better reflect the stages of the process.</p> <p>The SPD supplements Policy DM4 of the Core Strategy that requires affordable housing from qualifying sites</p> <p>Wording adjusted to encourage pre-application discussions.</p> <p>Old paragraph 6.5 / New paragraph 4.6 wording adjusted to reflect the position in relation to local housing needs surveys.</p> <p>Comments noted</p>
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					<p>How are the Council going to increase the house building on the island to address the low numbers of the amount of affordable housing that is being built.</p> <p>The targets in the tables seem very unrealistic</p> <p>The SPD can't write new policy, so it can't change the housing numbers that are detailed in the Core Strategy, but it can be clearer about the affordable housing provision that the Council requires across the Island.</p>	<p>Comments noted but not applicable to the content of the SPD.</p> <p>Comments noted and agreed.</p>
Public Comments						
SH	HASPD5	✓			<p>Supports the SPD but stresses that there should be more provision for Key worker housing to fill hard to fill roles of them roles. But to also reinstate the Council as a Landlord</p>	<p>Comments noted although direct provision of a particular type of affordable housing is beyond the scope of the SPD.</p>
Fran Osman-Newbury	HASPD7	✓			<p>The document is clear and basic to understand. An alternative could be to work with housing associations to build more affordable housing for renting and agrees that social and affordable housing should remain a priority for the lowest incomes and like this ambition, however its felt the council (Planning committee) are not</p>	<p>Comments noted.</p>

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						<p>proactive enough in granting permissions.</p> <p>In agreement of the approach to policy AH2 on first homes but don't think a blanket % and should depend on the circumstances of the purchaser and rules should be in place for resale.</p>	<p>First Homes, as defined by Government, require a minimum discount from market value to qualify as a First Home. Different discounts beyond the 30% would be supported if they came forward in schemes.</p>
Sue Macleod	HASPD8				✓	<p>Some general support for the SPD but Local housing needs should be on parish/local level and a parish level housing need survey can identify the local needs for affordable housing and should be the main driving force, the blanket approach will not be relevant to different areas of the island.</p> <p>Its felt the document is clear and easy to understand and the sources of data could be used now.</p> <p>Agrees with the approach for AH2 but not AH1.</p> <p>The Council needs to activate their housing company</p>	<p>Comments noted – the LPA has to plan on an island wide basis, but recognises the value of locally derived data, i.e. local housing needs surveys. In Guidance AH1 the SPD makes specific reference to these being a key source of information when determining what the make up of affordable housing is for a particular scheme.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted but beyond the scope of the SPD and Local Planning Authority.</p>
Hilary Benns	HASPD10				✓	<p>Local housing needs should be given the most weight in</p>	<p>Comments noted.</p>

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						<p>consideration of developments. And agree that 'First Homes' on the island should be discounted by a minimum of 30 per cent against market value.</p> <p>No major development should be permitted without any form of social or affordable housing for the lowest incomes. And something needs to be in place to ensure that these homes stay affordable after the sale by first occupants.</p> <p>The % stated on some of the approaches are unclear</p>	<p>Existing Core Strategy Policy DM4 requires provision of affordable housing from major development.</p> <p>Clarifications added.</p>
Carl Donoclift	HASPD11	✓				<p>General support for the document however felt not many people knew this document existed</p>	<p>Comments noted – consultation was undertaken with a wide range of stakeholders, including IWALC and also a press release / press notice.</p>
John Prickett (IW Community Led Housing project, Community Action Isle of Wight)	HASPD12	✓				<p>Considers Section 3 and in particular Figure 1 to be clear. I also consider the local connection criteria reproduced in Appendix 2 to be clear. The overall document is very comprehensive and draws on useful statistical data.</p> <p>Parish Level Housing Needs Surveys are very useful tools for assessing local need and shows a smarter picture of what is</p>	<p>Comments noted.</p> <p>Old paragraph 6.5 / New paragraph 4.6 wording adjusted to reflect the position in relation to local housing needs surveys.</p>

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					<p>needed but is costly, requires a lot of resource and has no funding.</p> <p>The relative popularity and affordability of products such as Shared and other Loew Cost Home Ownership offers varies dependant on many factors, whereas Social or Affordable rent is a constant need.</p> <p>The ranges of other tenure types are good options but each of them do have some negatives alongside the positives. RentPlus could be an aspirational option - worth trying.</p> <p>First home exception sites could reduce the availability of affordable rents. And market housing is needed.</p>	<p>Comments noted.</p> <p>Comments noted – the SPD aims to provide sufficient flexibility so that a wide range of affordable housing products could be delivered, depending on local circumstances.</p> <p>Noted – however First Homes exception sites are set out in government guidance and this SPD cannot override that.</p>
Emma Cox	HASPD13	✓			<p>I found the document easy to read and appreciated the clarifications throughout its length, negating the need to have several documents open to achieve full understanding.</p> <p>Its felt that data should be reviewed at regular stages when an application takes longer to decide to ensure that the affordable housing</p>	<p>Comments noted.</p> <p>Comments noted – S106 agreements that secure AH from sites are signed at the end of the determination process so can reflect any latest position, subject to compliance with adopted policy.</p>

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					<p>being built continues to be affordable for island needs.</p> <p>Parish level housing needs surveys should be carried out every 2/3 years to reflect changing needs. The council should support parishes to design a template so that all parishes are doing the same.</p> <p>I am pleased that the developer is requested to fund a local housing survey where one is not available. Although it states that the LPA will request evidenced justification as to why developers cannot achieve affordable property levels I would request that this evidence be tested by the LPA and not taken on trust. It seems strange to me that evidence throughout the planning process provided by developers is taken as read and not checked by the LPA.</p> <p>I would prefer the statement said, "affordable social rented housing". Private landlords do not always give long term</p>	<p>Old paragraph 6.5 / New paragraph 4.6 wording adjusted to reflect the position in relation to local housing needs surveys.</p> <p>As set out in the Affordable Housing Contributions SPD, any AH viability evidence submitted is evaluated by a third party, e.g. District Valuer.</p> <p>Comments noted however under current national and local policy (which an SPD cannot change) affordable rented</p>
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					<p>secured tenancies and this can be detrimental to those people living month to month with no security of home.</p> <p>The LPA should be as flexible to the mix of types of tenues i.e. first homes, social renting, Rentplus etc as to the varying needs of the people require. It might be preferable to have a sliding scale 25% first homes 30% discount or 20% first homes 35% discount, depending on the overall market value of the home depending on its location on the island.</p> <p>we have brownfield sites across the Island, and they may require additional investment to make them suitable for development.</p>	<p>properties meet the definition of affordable housing.</p> <p>Comments noted and agreed on flexibility issue. First Homes removed as a requirement on all schemes to allow a more flexible approach across products.</p> <p>Comments noted but beyond the scope of the SPD.</p>
Charles Glover-Short (Southern housing group)	HASPD14	✓			<p>✓</p> <p>In general, we consider section 3 to be clear and understandable. reference to local connection, it is important to note that Shared Ownership housing funded with grant from Homes England is not permitted to be subject to any occupancy restrictions. The majority of s106 affordable</p>	<p>Comments noted and new paragraph 3.5 added to reflect this point</p>

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					<p>housing is not grant funded and this is therefore not an issue. However, this is likely to be an issue where the whole site is to be delivered by a Registered Provider (RP) as affordable housing with the use of grant.</p> <p>Increased partnership working between the Council and RPs - including the supply of Council land to RPs at low or nil cost</p> <p>Whilst the data sources are agreed with its felt further data should be included.</p> <p>Housing surveys can be useful but its suggested to include guidance on local surveys and the frequency with which they should be updated.</p> <p>Whilst we generally support the approach outlined in paragraphs 6.12 & 6.13, we suggest making specific reference to additional flexibility relating to housing mix and percentages</p> <p>Generally support social and affordable housing but there is a need for flexibility over the percentages to ensure that the tenure is split for a scheme.</p>	<p>Comments noted.</p> <p>Guidance point AH1 now references that other site specific constraints and reasons may influence mix being put forward.</p> <p>Old paragraph 6.5 / New paragraph 4.6 wording adjusted to reflect the position in relation to local housing needs surveys.</p> <p>Comments noted however the SPD cannot provide a further required split between social and affordable rented as this would need to be introduced through new policy that has been viability tested.</p>
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						<p>Housing associations rely on grants to develop wholly affordable schemes</p> <p>Paragraph 1.4, the sixth bullet point “where it” has been repeated twice.</p> <p>- paragraph 2.1, we believe the first quote from the Planning Practice Guidance (PPG) is taken from Paragraph: 019 Reference ID: 2a-019-20190220. However, the wording isn’t an exact match. We suggest including the paragraph ID number to ensure users of the SPD can review the relevant PPG guidance and to ensure the SPD is as user friendly as possible.</p>	<p>Bullet has been deleted</p> <p>Revision made to paragraph 2.1 (which now appears as Appendix 1) to include reference.</p>
Dawn Osborne	HASPD15		✓			<p>We need social housing urgently!!!</p> <p>Not more private!!!</p>	Comments noted.
Jan Re	HASPD16				✓	Housing associations should turn empty properties around sooner it would help greatly	Comments noted but beyond the scope of the SPD
David Fisher	HASPD17				✓	it is very difficult to get advice, help and affordable land to build a small house om	Comments noted but beyond the scope of the SPD
B Hobbs	HASPD21		✓		✓	The draft proposal does not address the current, or future,	Comments noted – the scope of the SPD is to provide guidance on the implementation of existing policy.

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					<p>housing situation for the majority of local islanders.</p> <p>It is essential all properties involved in such developments remain 'affordable' throughout their lifespan. But there is a dire shortage of all social and affordable homes. Could a clause be added for the Council to buy back at affordable scale if no qualifying island purchases.</p> <p>The affordable stated in this draft is NOT AFFORDABLE to the majority of working Islanders.</p> <p>The council should build more social housing, but social housing should not allowed to be purchased.</p>	<p>The SPD cannot introduce new policy that requires deeper discounts from market value that are different to those set out in the NPPF.</p> <p>Comments noted but beyond the scope of the SPD.</p>
Daniel Crawford (Sovereign)	HASPD23			✓	<p>Broadly support the aims and spirit of the island and the draft SPD the document has been presented as forming planning policies and an SPD should build upon this and give more detailed guidance.</p> <p>Section 3 is a clear outline of the process of affordable housing but feels it could go further with other routes of delivery.</p>	<p>Comments noted and multiple changes made to reflect the fact that the SPD is guidance on implementing existing policy rather than new policy.</p> <p>Comments noted and new paragraph 3.5 added to reflect this point</p>

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					<p>Policy AH1 does provide a wide source of data but would encourage applicants to engage with registered providers – Could this be included in the text?</p> <p>There is a level of support to deliver social and affordable housing on the island this should be on a site by site basis as could end up with sites being all rented products and limit other routes of affordable housing. Further viability tests need doing on the SPD.</p> <p>50% discount would be a more affordable alternative but this would need to be evidenced and tested</p>	<p>New paragraph 4.4 amend to include reference to engagement with RPs</p> <p>Comments noted and SPD aims to provide flexibility to bring forward AH mixes that respond to local circumstances if backed up by data/evidence.</p> <p>Comments noted however any deeper discounts over and above NPPF definition need to be tested through local plan process.</p>
Peter Griffiths (Home consultancy Ltd)	HASPD25				<p>✓</p> <p>Careful thought needs to be given to the local connection criteria</p> <p>This SPD should supersede the currently adopted one to cover requirements of DM4 – having two provides uncertainty.</p> <p>6.2 and 6.6 needs removing as it is not in line with DM4 so would it holds very limited weight in the determination of applications.</p> <p>The policy of a 25% First Homes split can be introduced but the</p>	<p>Comments noted – LCC has been used consistently within S106 agreements.</p> <p>Reference added to highlight that this SPD will work in parallel with existing AH Contributions SPD.</p> <p>AH1 and AH2 reworded to reflect the fact they are guidance on the implementation of existing policy rather than new policy.</p> <p>Requirement for 25% First Homes on all sites removed to allow flexibility.</p>

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					<p>80/20 split has not been tested through the examination process and therefore cannot be introduced through an SPD.</p> <p>Rentplus is an organisation not a product.</p> <p>6.13- Viability could be more specific.</p> <p>Development industries should be aware of the full range of affordable housing product. Also, the terms should be clarified within the document and all routes of home ownership explained.</p> <p>Look at what can be delivered through Discount Market Sale (DMS). DMS can be sold at a discount exactly the same as First Home. We do not consider that there is a need to introduce First Homes (until the new NPPF whenever it is published formally requires it)</p>	<p>Comments noted.</p> <p>These paragraphs have been removed as they duplicate existing Policy DM4 and AH Contributions SPD. Appendix 1 provides lists of AH products and definitions as per NPPF.</p> <p>Comments noted and see earlier comment re: removal of requirement for 25% First Homes.</p>
Jamie Roberts – Tetlow Kind Planning	HASPD28	✓		✓	<p>Welcomes the recognition of Rentplus in AH1 but it needs rewording to make clear the list of data sources is not exhaustive.</p> <p>Proposed policy wording change to Policy AH1 point iii to</p>	<p>Comments noted and Policy DM4 and AH1 provide flexibility for other data to be utilised and justified.</p> <p>Bullet (iii) now last paragraph of AH1 and sentence added to reflect that any</p>

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					<p>emphasise flexible approach. iii) The starting point for the Council's consideration of the expected tenure mix of on-site affordable homes at the pre-application / application stage is set out in Policy AH2</p> <p>A more flexible approach to First Homes is needed on the IoW and that the LHNA should be updated to take account the deposit requirements.</p> <p>Paragraph 6.11 should be reworded to state: The Council recognises Rentplus as an affordable housing product and that this can contribute to the 20% other affordable housing category that meets the definition of both 'affordable housing' for rent, and 'other affordable routes to home ownership' as defined at Annex 2 of the NPPF".</p> <p>Paragraph 6.12 to read: The Council accepts that there may be exceptional circumstances in limited cases where a flexible approach towards the delivery of affordable housing is required. recognises that there may be exceptional circumstances where</p>	<p>alternative can be put forward and justified on a site specific basis.</p> <p>Requirement for 25% First Homes on all sites removed to allow flexibility.</p> <p>Paragraph 4.1 (previously 6.11) has been reworded to reflect the position that Rentplus is recognised as an affordable housing product that can contribute to the mix, removing reference to '20% other'.</p> <p>Paragraph has ben removed as duplicated information in Policy DM4 and AH Contributions SPD.</p>
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					<p>it is not viable to deliver 35% affordable housing;.</p> <p>The proposed Policy SPD AH2 should be amended to make it clear that the mix is a 'starting point' for consideration. The policy should read: "On qualifying sites, development proposals are expected to provide 35% as on-site affordable housing. This should include the following mix: The affordable housing should deliver an appropriate mix of tenures that responds to local need and circumstances, taking the following mix as a starting point:</p> <p>I I) 25% affordable home ownership dwellings (such as First Homes discounted by a minimum of 30% against the market value; discount market sale; other affordable routes to home ownership)</p> <p>II II) Of the remaining properties, a target mix of:</p> <p>a. 80% affordable housing for rent (social or affordable rent)</p>	<p>AH2 has been revised to remove requirement for First Homes on all sites and to reflect the fact the document is guidance on how the LPA may choose to implement existing policy.</p>
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						<p>with discounts in line with the Affordable Housing Assessment 2019 (AHA).</p> <p>b. 20% to be other affordable housing products (which can include Rent plus rent to buy) with the mix of unit sizes informed by SPD Policy AH1.</p> <p>Any First Homes included as part of the mix should be discounted by a minimum of 30% against market value</p> <p>III) Proposals should be supported by a local housing survey.</p>	