

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
<b>ST26 - Affordable Housing</b>			
REF136	A and D Architecture	5) Policy ST26 should be modified to state that static caravans are recognised by the Council as legitimate affordable housing. A new sub-section G should read: "G. The Council values the role the park home sector plays in the housing market offering an affordable alternative to mainstream housing for many people, often over the age of fifty, in mainly rural and semi-rural locations and will support applications for the development of new Park Home static caravan sites."	The Council does not consider it necessary to allocate sites for Home Parks. There are policies in the plan which can be used to determine applications for Park Homes.
REF205	Consultant	The Policy proposes the provision of 10% affordable on brownfield sites and 20% provision on greenfield sites. This policy is supported at the Church Farm site which is a combination of brown and greenfield land. It is also accepted that the development should have a mix of size of properties. Open book viability assessment is accepted. Information has been submitted to Hayton Parish Council Neighbourhood Plan Working Group.	The Council will consider new sites submitted through the Land Availability Assessment process. Potentially suitable sites will be taken through the Sustainability Appraisal process.
1196559	Resident	ST26; The Policy on Affordable Housing must be maintained if not increased. This is essential for future generations, However, the Council and it's Planning Department MUST be strong with Developers who obtain approvals to include such housing and then apply for deferments and the Affordable element is lost.	The Local Plan can only deliver affordable homes where viable. The Whole Plan Viability Assessment has informed this policy. The Council will use a range of other mechanisms, working with other agencies, such as Registered Providers, as well as the Local Plan to deliver affordable housing.
REF270	Barton Willmore	<p>Uplift for affordable housing</p> <p>2.71 Notwithstanding the case for an uplift in housing numbers to account for the economic conditions within Bassetlaw, we consider that there is a case to be made for the level of housing provision to be further increased to account for the need to provide affordable housing within the District.</p> <p>2.72 The newly revised PPG notes that the SMOAN makes an 'affordability adjustment' to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. This specific adjustment in this guidance is made in response to the 'affordability' of housing rather than to meet the needs for 'affordable housing'. The adjustment is made only to ensure that housing provision is set at a level to ensure that the minimum housing need "starts to address the affordability of homes ". As a minimum, this policy requirement of a Local Plan is only that it does not make the affordability of homes worse. The above makes no requirement on the solving of affordable housing shortfalls within Districts.</p> <p>2.73 The Council's 2017 Strategic Housing Market Assessment (SHMA) identifies affordable housing needs for the District separately, which the SMOAN does not. That affordable housing need shows a need of 134dpa for affordable homes between 2014 -2035. The Local Plan (at paragraph 7.13.5) shows that, taking into account current under delivery of affordable housing, there is a residual requirement for 2,578 affordable homes to be delivered within the plan period.</p> <p>2.74 The Local Plan suggests that the above affordable housing needs will not be met due to viability issues. Whilst the ability of the open market to deliver affordable housing is an issue which must be addressed, including allocation of Sites in more buoyant market areas, the main contributing factor to the lack of affordable housing that can be delivered is the lack of housing proposed overall.</p> <p>2.75 The Council has not provided a breakdown of what the maximum number of affordable units the proposed supply could deliver. However, from a review of the AMR data available it is clear that the delivery of affordable housing is likely to fall significantly below the 134dpa required through the plan period. In 2016/17, the Council's most successful year for delivering homes (459 dwellings) 67 of those were affordable which equates to circa 15%.</p> <p>2.76 In addition, of those 67 affordable housing commitments, one site was in Harworth and the remaining in Retford. Paragraph 2.13 of the AMR states that most of the affordable housing completions and commencements for the monitoring period are situated in Retford with a lack of affordable housing elsewhere. This further demonstrates that Retford is an important location within Bassetlaw for housing development and affordable housing. An uplift in the housing requirement for Retford will ensure that the Council can provide affordable housing within the District.</p> <p>2.77 If the above rate of delivery of affordable homes was maintained, the District would need to deliver some 893dpa to deliver the level of affordable housing it needs. With regard to the above, and in light of increasing</p>	The Housing and Economic Needs Assessment Update 2020 provides the basis for the housing numbers in the Local Plan and the approach taken to affordable housing. The housing requirement exceeds the standard method baseline therefore it is considered that the Local Plan does provide for an uplift to account for affordability and to provide more affordable homes through market led schemes than would have been the case if the standard method was used.

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		difficulties facing the District with regard to affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs.	
REF281	Notts Campaign to Protect Rural England	<p>The affordable housing requirements of 10% for brownfield sites and 20% for greenfield sites are low and unlikely to create the mixed, sustainable communities Bassetlaw aims for. However, we appreciate the constraints imposed by current national planning policy guidance. CPRE has consistently produced evidence showing that this regime does not and cannot deliver the affordable housing needed.</p> <p>We welcome F. :          "Any proposed amendments to a planning permission that results in a reduction in affordable housing of the original permission should be assessed by an Open Book Viability Assessment in accordance with Policy ST52." as this introduces the accountability and transparency.</p>	Thank you for your comments which are noted.
REF285	Home Builders Federation	<p>As set out in the 2019 NPPF, the Council should understand and test the influence of all inputs on viability. The cumulative impact of infrastructure, other contributions and policy compliant requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). The deliverability of the Local Plan should not be undermined (para 34). The Council should prepare a viability assessment in accordance with the NPPG to ensure that policies are realistic and the total cost of all relevant policies are not of a scale that will make the Local Plan undeliverable (ID : 61-039-20190315). The Council's viability evidence is set out in Bassetlaw Interim Whole Plan &amp; Community Infrastructure Levy (CIL) Viability Assessment by NCS Nationwide CIL Services dated August 2018. It is noted that the Council's viability assessment only includes costs for policy compliant requirements for accessibility, space and water efficiency standards. The Council consider that all other policy requirements such as provision of self &amp; custom build plots, at least 10% on-site biodiversity net gain and provision of electric vehicle charging points do not have a significant impact on development costs. Such assumptions under-estimate the cumulative financial impact of policy compliant requirements on the viability and deliverability of residential development. Before the pre-submission Local Plan consultation, the Council should undertake further viability work. Policy ST26 should also be modified to be more flexible regarding on-site and off-site provision of affordable housing. On smaller sites, on-site provision may not be practical because it is not mathematically possible, no registered provider is willing to manage the new affordable units or other legitimate planning reasons.</p>	The most up to date Whole Plan Viability Assessment is 2019 not 2018 and concludes that all policy requirements can be achieved as part of a viable plan. The policy does make reference to on and off site affordable housing delivery.
1197091	William Davis	<p>The approach to affordable housing is broadly supported. However, it is noted that reference to development with a combined floorspace for 1000sqm is no longer included in the national policy and should therefore be removed from the policy. Given the guidance in the NPPF/NNPG that it is for applicants to demonstrate what has changed since the plan wide viability assessment (NPPF para 47 and NPPG para: 007 Reference ID: 10-007- 20190509) any requirement should be robustly justified and flexible. In terms of the Interim Plan Wide Viability &amp; CIL Viability Assessment it is noted that: • Paragraph 4.22 of the Viability Assessment refers to National Housing Standards and does not appear to take into account the Future Homes Standard consultation (<a href="https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-land-part-f-of-the-building-regulations-for-newdwellings">https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-land-part-f-of-the-building-regulations-for-newdwellings</a>) on changes to the Buildings Regulations which are to be introduced in 2020. These changes could add over £4,800 to the cost of a new dwelling. The Impact Assessment carried out on the Future Homes Standard consultation options identified a reduction in housebuilding as a potential impact. Given the likely introduction prior to adoption of the Local Plan it will be important that any requirement is future proofed to avoid the need for viability assessments to be submitted as a matter of course. • Construction costs have been assumed to be £1183/sqm including consideration of policy requirements. This represents an industry average and may not be applicable to every developer; a range of assumptions would provide a more robust figure. • The NPPG requires that plan makers engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage (para 006 Reference ID: 10-006-20190509). The Viability Assessment does not provide any details of engagement carried out on the assumptions used. As part of the updated Viability Assessment input on the assumptions used in the assessment should be sought from stakeholders.</p>	The Council will ensure that the policy reflects national policy. Policies and evidence can only be based on current building regulations. There is no certainty that the changes mooted in the Future Homes Standard consultation will be implemented. The Whole Plan Viability Assessment has been subject to discussion with stakeholders. The purpose of Whole Plan Viability is to ensure that in general the development identified in the Local plan is deliverable. It is accepted that there may be exceptional cases where this is not feasible. Policy ST52 makes provision for those circumstances. These are detailed in the report. Further versions of the Viability Assessment will also be subject to stakeholder engagement.

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REF299	Gladmans	Policy ST26 sets out that on major developments, the affordable housing requirement will be 10% on brownfield sites of which all the provision should be for affordable home ownership, and 20% on greenfield sites of which 50% will be for affordable home ownership and 50% will be for affordable rent. Where the contribution of affordable housing provision is likely to have an adverse impact on viability the developer will be required to provide an Open Book Viability Assessment in accordance with Policy ST52. Welcome the flexibility and proactive approach provided by this policy with regards to meeting the affordable housing needs of the District. Only through positively planning for significant housing growth can the Council realistically tackle market signals in a way which is advocated by the PPG and in doing so tackle the affordability issues prevalent in Bassetlaw.	Thank you for your comments which are noted.
REF310	P&DG	Draft Policy ST26 relates to the affordable housing provision for schemes of 10 or more residential units. Part B1 of the Policy should incorporate the broader definition of affordable housing outlined within Annex 2 of the Framework. The affordable housing should not be limited to affordable home ownership and affordable rent, it should also refer to all elements expressed in Annex 2 to make it compliant.	The Glossary provides the definition for affordable housing which was taken from the NPPF published at Jan 2020.
REF327	Scrooby Parish	This must NOT mean any reduction in the quality / type of build and where built as part of a larger development, then the "Affordable Housing" element must match the rest of the development in size, design, quality and build.	The policy states that affordable housing should be indistinguishable to market housing.
REF401	East Markham Parish Council	EMPC fully endorses this policy and requests that it is enforced	Thank you for your comments which are noted. The Council will continue to seek the delivery of affordable housing in accordance with national and local policy requirements.
REF486	Councillor, Bassetlaw District Council	Aspirational rather than categorical on how we will deliver the anticipated number of units. Despite policy and determined practice, we have achieved less than half of the five year target. The Plan will give us more 'clout' but our stated target is only a quarter of the expected need- 605 against 2578. Even allowing for those already on sites with permission that leaves a big gap to be filled by uncalculated alternatives. Moreover, the assumption that sites will deliver units does not address the appropriateness of those sites, (Harworth, I'm told, is a location people don't wish to move to) and will Cottam possibly have a similar problem?	The amount of affordable housing to be delivered by market housing schemes in the Local plan is the maximum that can be achieved by viable development. However the Council will facilitate the delivery of affordable housing in a range of ways. There is a requirement for affordable housing in all areas of the District.