

Revised Affordable Housing Supplementary Planning Guidance - Consultation Responses				
Representor	Object/ Support/ Comment	Comment	LPA Response	Recommendation
Adult Select Committee	Support	Pleased to see exemption for small conversions 1 - 4 above shops as this will help to bring these forward.	Support noted.	No change necessary.
	Object	Concerned that large barns will now be exempt. Feel that these could make a contribution if a large profit is made by the developer. If a developer bought a barn complex and converted them individually they wouldn't have to pay a contribution.	If a developer bought a barn complex we would expect a contribution towards affordable housing from 2 upwards. If the developer sold them individually to self-builders they would be exempt under the existing and revised policy. The conversions of barns ensures that these traditional rural buildings are preserved and this also preserving the character of the open countryside thus the development is maintaining other policy objectives.	No change proposed as conversion of single barns has been evidenced to be unviable. The revised policy still requires commuted sums from 2+ conversions on a complex (i.e. the first barn is exempt).
	Comment	Could ask for a contribution for single barns over a certain size - e.g. over 150m2. Would like the proposal for larger barn conversions to be brought to Cabinet's attention.	Evidence from the previous two years has shown that single barn conversions are largely unviable. The proposed changes to the SPG seek to simplify the application of the policy so that Council resource is best focused where there is benefit. The proposed threshold would be set at an arbitrary size and would unfairly affect applicants where the barn was just over 150m2. A series of thresholds, to be more fair, would be unduly complicated for all parties. It is considered better either to exempt all single barns as in the revised policy or revert to asking for a contribution from all single barns and base this on viability. Cabinet will be made aware of all consultation responses including feedback from Adult Select Committee.	No change proposed as conversion of barns has been evidenced to be unviable.
	Comment	Could we ask for a contribution and use it as a grant to bring derelict properties back into use.	The contribution must be used to secure additional affordable housing. This could be new build or conversion or acquiring existing homes. This could include acquiring an empty home for use as an affordable home.	Section B1 is amended to clarify this.
	Comment	Why is CIL value for Severnside lower than the others - removal of tolls have lead to higher house prices in Severnside.	The CIL work was undertaken at a set point in time prior to the removal of the tolls. Additional up to date viability assessments will be undertaken as part of the Replacement LDP process.	No change necessary.
	Comment	Concerned about DV undertaking viability appraisals following site in Abergavenny being considered unviable by DV.	District Valuer Services (DVS) is the specialist property arm of the Valuation Office Agency (VOA). They provide independent, impartial, valuation and professional property advice across the entire public sector, and where public money or public functions are involved. It is considered that they are the most appropriate body to conduct the appraisal and they would provide impartial review of developments.	No change necessary
	Support	We seem to be getting hung up on barns, which are not that many, and we are being told that they are unviable. Sensible officers have looked at this and are telling us that we are wasting money trying to get blood from a stone. We need to listen to our officers. Comments will be summarised and will go forward to Cabinet. I would just endorse what is in front of me.	Support noted.	No change necessary.

Judith Doyle - Archaeological Planning Officer	Comment	The legislative framework in which the historic environment operates and the management of the historic environment should not be seen as a constraint to development but viewed together. Housing developments of any size and nature may have different impacts on the historic environment, both positive and negative and this should be noted. Developments that will require planning or listed building permission should be in consultation with us at an early stage.	Where development is proposed on a site with archaeological constraints Glamorgan Gwent Archaeological Trust (GGAT) would be consulted on the proposals and ask to provide comment. Development should not have an adverse impact on the historic environment and this amended SPG would not have an impact on the historic environment.	No change necessary.
LRM Planning on behalf of Llanarth Estates	Comment	Overall supportive of proposed amendments, however: SA.4 (Vi) - Overall development costs not known at the application stage and detailed information/studies are needed. SA.4 (Vii) - Minimal land value at which land owner will release their land for development particularly small scale sites. A6 Layout & Design - Flexibility to allow larger clusters, larger schemes will potentially require larger clusters and impact can be mitigated through innovative design. Self build - Flexibility given to self build plots and thought should be given to larger sites with an element/phase of self build. Types of affordable housing - Flexibility needed to encourage innovative ways of providing housing. E.2 Departure Apps - Unsure whether the requirement can carry weight as it is by definition not supplementary to any policy of the plan. 5.11 Formula - Feel its appropriate to use the District Valuer to arbitrate if brown & green field sites face onerous financial contributions.	It is the responsibility of the developer to ensure that they conduct necessary survey work and due diligence and that they are fully aware of the costs of bringing forward sites taking S106 contributions fully into account. Adopted policies should be fully considered prior to site purchase. Viability calculations allow for some contingencies. The same will apply for smaller scale sites. The land owner needs to be fully aware of the financial contributions that are being sought and this revised SPG will provide clear transparent guidance on this matter. There are no policy barriers to self build development in Monmouthshire. Council would encourage innovative ways of providing affordable housing and have previously approved such schemes. Larger clusters - Pepper potting is preferred as it helps create a mixed and balanced community as opposed to concentrations of the same types of housing.	No change necessary
David Addams-Williams of Llangibby Estates	Comment	60% affordable housing requirement on rural sites is a disincentive for landowners to bring forward sites and even more opportunities for developers to purchase and build out the sites. If the percentage was decreased then the number constructed would increase	9 of the 60/40 Affordable Housing sites in main villages have gained planning consent and thus it is been evidenced that these types of sites are coming forward and are viable. The next LDP will review the level of affordable housing that would be required on new housing sites: this concern relates to an LDP policy which cannot be amended via SPG even if Officers agreed with the comments made.	No change necessary.
Lynne Morgan - 13 Wyelands View, Mathern	Comment	In reference to the recognised link between housing, health and well being, the proposals encourage developers to increase the number of dwellings on each site with the revised ratio of affordable housing and it's fair to assume that each new household could have 1 or 2 cars. This impacts on the road systems and as there are no plans for by-passes it would mean increased congestion which impacts on health and well being.	The policy seeks to increase the proportion of a development that is affordable housing, not increase the number of dwellings on a site. Notwithstanding this, any impact on the highway network would be a material planning consideration. Planning Officers and Highways Officers will consider if the proposed development is acceptable in terms of encouraging sustainable forms of transport and whether the development has an acceptable impact on the highway network. All applications have regard to the Well-being of Future Generations Act.	No change necessary.
South East Planning	Comment	No comment		No change necessary

Redrow	Comment	<p>Viability is affected by many factors and its often not known what the Council position is until time of application. Redrow suggests that the new paragraph vi and vii of the draft SPG are omitted. The remaining paragraph viii provides the appropriate mechanism and control for undertaking a viability assessment at planning application stage.</p> <p>Paragraph viii 1.7 - Redrow's experience is that the DV always insist that their appraisal work and advice remains confidential. It is suggested that this is clarified with the DV and Redrow would always too insist that detailed viability assessments are kept confidential.</p> <p>Paragraph ix 1.8 The statement that "The Council will expect land transactions to reflect policy, rather than the other way round" is inappropriate. Viability appraisals, including by the DV are undertaken by chartered surveyors. They need to adhere to their code of practice as set by the Royal Institute of Chartered Surveyors (RICS). It would be inappropriate for the planning system to influence this established practice and process for land valuing. A realistic and reasonable approach is required when setting out how a land value is proportioned between landowner, developer and as planning obligations.</p>	<p>Viability is a critical factor when considering proposed development and the Council encourages pre application discussions to outline site specific S106 contributions to provide certainty for developers. We will seek to liaise with the DV in relation to making their assessments public however this information would be shared with Officers and the Planning Committee in determining any applications. It is considered that it is the developer's responsibility to recognise the development costs of the site including S106 obligations and if they would need to negotiate the cost of the land to bring it forward for development.</p>	No change proposed
Redrow Continued..		<p>P.9 – B.1 Contributions factored utilising CIL rates 1.9 Whilst not applicable to Redrow as this section only relates to 1-4 unit schemes it is considered inappropriate to calculate a financial contribution based on CIL rates that have not been adopted for use. It is not understood how it can be justified and reasonable to utilise the CIL rate to calculate an affordable housing contribution. The CIL rate was devised for planning obligations that excluded affordable housing consideration. As such, there is no correlation. An affordable housing formula and alternative mechanism to secure other planning obligation contributions should be utilised.</p> <p>P. 18 – Paragraph 5.9 & 5.10 1.10 The draft SPG requires affordable homes to be transferred on a neutral tenure basis and then the following sentence refers to the aim of developing mixed and balanced communities. It is considered appropriate and reasonable for affordable housing delivery to be specific to the site and not on a neutral tenure basis. This is supported by paragraph 5.16.1 of the draft SPG that states the local need will be identified by the Council. The mix of affordable housing tenures helps in creating a mixed and balanced community. Utilising a mix of affordable housing tenures (social rented, intermediate rent and Low Cost Home Ownership) will also likely assist with viability matters.</p>	<p>CIL - The calculation of the CIL rate was conducted by an appointed external consultant and provides an evidenced based approach to the level of financial support required to provide infrastructure in these areas. The point made is noted. Although CIL has not been adopted in Monmouthshire it is considered that this evidence based work can provide rationale for the financial contribution required for affordable housing in that it reflects different levels of viability in different areas. To avoid confusion, references to CIL rate in the SPG will be changed to Commuted Sum Rate.</p> <p>Affordable Homes - tenure neutral provides the greatest long term flexibility for both future occupiers of the affordable homes and the Council/RSLs. It is acknowledged that this means all affordable homes must be designed to achieve DQR and that the %ACG is affected for the developer. The Council's wider approach will be considered as part of the LDP review.</p>	Change references to CIL Rate to Commuted Sum Rate.

Redrow Continued..	Comment	<p>As part of the revised Local Development Plan Redrow believe that there is merit in looking at utilising S106 contributions for affordable housing more strategically. Historically, within Monmouthshire and other LPAs, sites in higher value areas target greater provision of on-site affordable homes due to it being viable to do so. However, this is not necessarily where the affordable housing need is or where people on the housing register would wish to reside. Those more affluent tend to prefer not to live near those in affordable housing but equally this is true whereby those less fortunate tend to not want to live next to larger private homes. To create a balance and mix of housing some affordable housing should remain on-site but it is whether it is beneficial to generate part of the affordable housing provision as off-site contribution rather than simply request a higher percentage on-site? A direct benefit of this approach could see S106 money secured by affordable housing contribution being strategically used to greater benefit and assisting more people. A 15% (e.g. equivalent to 20 units) contribution gained from a higher value site could provide 25 units on another lower value site or refurbish 40 units in existing stock.</p>	<p>This comment could be reviewed as part of the LDP however at this stage it is considered that to ensure that we provide cohesive and mixed communities the delivery of onsite affordable housing provision is essential to provide accommodation for younger people who may be unable to access the open housing market given the high cost of homeownership in Monmouthshire. At present, the level of affordable need within the County means it is unlikely that new developments would provide 'too much' affordable housing in a location.</p>	<p>No change in the SPG. The idea will be considered further as part of the LDP review.</p>
Bovis Homes	Comment	<p>Bovis Homes considers it important to ensure the viability and deliverability of sustainable development. As such, it is sometimes necessary to undertake a viability assessment at the planning application stage. Where viability assessments are deemed necessary, Bovis Homes support an open book approach with the viability assessment being published in the public domain as set out in the Revised SPG. Bovis Homes welcomes the intention of the Revised SPG to provide more detailed guidance on viability assessments, the circumstances in which they are appropriate and how they will be assessed. However, Bovis Homes are concerned that as currently drafted the Revised SPG does not fully accord with Planning Policy Wales 10 (PPW10). Bovis recommend modification to Paragraph A4(vi) of the Revised SPG. Based on the above, Bovis Homes recommend the following modification to Paragraph A4(vi) of the Revised SPG:</p> <p>“Planning obligations and affordable housing will have an impact on land values and landowner expectations. Applicants are expected to have considered in full the overall cost of development, including the required quantifiable planning obligations required by policy and any known abnormal costs, when negotiating the purchase of land. Viability assessments will be limited to sites where there are exceptional, unforeseen circumstances outside the scope of normal market risk or where there is an overriding regeneration benefit in developing the site. Where the development plan policies and the viability evidence underpinning them is up-to-date, it will be for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage. Such circumstances could include, for example, where further information on infrastructure or site costs is required or where a recession or similar significant economic changes have occurred since the plan was adopted.”</p> <p>Based on the above, Bovis Homes recommend the following modification to Paragraph A4(vi) of the Revised SPG:</p>	<p>The overall support for the proposed approach, including publication of viability appraisals, is welcomed. The suggested changes to A4(vi) have been noted. It is considered that some of the suggested changes would assist in clarifying the policy approach, others imply a far wider range of cases where viability appraisal would be appropriate (rather than it being exceptional), while other suggestions are minor changes are not considered to be significantly different in terms of outcome. As a result, the following change is proposed: Planning obligations and affordable housing will have an impact on land values and landowner expectations. Applicants are expected to have considered in full the overall cost of development, including the required policy-based planning obligations and any reasonably known abnormal costs, when negotiating the purchase of land. Viability assessments will be limited to sites where there are exceptional, unforeseen circumstances outside the scope of normal market risk, for example where a recession or similar significant economic changes have occurred since the plan was adopted, or where there is an overriding regeneration benefit in developing the site.</p>	<p>Amend A4(vi) to: Planning obligations and affordable housing will have an impact on land values and landowner expectations. Applicants are expected to have considered in full the overall cost of development, including the required policy-based planning obligations and any reasonably known abnormal costs, when negotiating the purchase of land. Viability assessments will be limited to sites where there are exceptional, unforeseen circumstances outside the scope of normal market risk, for example where a recession or similar significant economic changes have occurred since the plan was adopted, or where there is an overriding regeneration benefit in developing the site.</p>