Summary of Representations Received on the

Draft Affordable Housing Supplementary Planning Document

Consultation between 7th November 2019 and 5th December 2019

Consultee	Key text from representation	Changes sought	Council Response
General comments			
Cllr Ben Aitken	…after much tapping and trying I eventually accessed the document. User friendly? Please show users the way to access or they may just decline to dialogue. Very comprehensive… A new document should be looking forward. This is a summary of old tried policies doesn't appear to show anything new or far seeking.	None specified	The Council has resolved issues that were experienced with the website early in the consultation period Comment noted As an SPD, the document may give detail on the implementation of Local Plan policies but the Council may not make new policy through the SPD.
Highways England	Having considered the document, there are no areas that we feel we should comment on.	None	Comment noted
Peter Harris	Unfortunately, after reviewing the document, I do not fell qualified to comment on this issue	None	Comment noted
Historic England	Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.	None	Comment noted
Lead Local Flood Authority at Lancashire County Council	The Lead Local Flood Authority (LLFA) has no comment to make on the above	None	Comment noted
Environment Agency	We have reviewed the Draft SPD insofar as it relates to our remit and on this occasion we have no comments to make.	None	Comment noted
Westby-with-Plumptons Parish Council	…the affordable housing scheme is a much overdue initiative that needs to be focused to requirements and monitored independently rather than by the developer when assessing/feasibility. The parish council support the initiative.	None	Comment noted

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Greenhalgh-with-Thistleton Parish Council	…the affordable housing scheme is a much overdue initiative that needs to be focused to requirements and monitored independently rather than by the developer when assessing feasibility. The parish council support the initiative.	None	Comment noted
Homes England	Homes England does not have any land holdings affected by the consultation and therefore we do not propose to make at representations at this point. We will however continue to engage with you as appropriate.	None	Comment noted
Natural England	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	None	Comment noted The Council subjects all SPDs to SEA screening. The screening carried out by consultants Arcadis on the draft SPD concluded that it does not meet the criteria for a plan that requires the application of SEA.
CPRE	Summary We wish the local plan team well with the production of Local Plan and identification of an adequate supply of housing sites, especially including affordable housing in the mix. We hope the policies and allocations will best steer future sustainable development, and so the countryside and green spaces of Fylde are best protected and enhanced for the benefit of future generations. Our climate and biodiversity must be protected and the affordable housing strategy can achieve enough suitable affordable homes AND protect our natural environments. We will continue to work with future Governments to have a	Not in respect of this section	The response appears to have been largely a generic response prepared for any local plan consultation and does not relate directly to the SPD

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	planning system that is fit for purpose on all the issues we refer to above.		
Lichfields for Taylor Wimpey	Taylor Wimpey welcomes the efforts made by Fylde Council to support the adopted Fylde Local Plan with a number of Supplementary Planning Documents. These representations seek to provide constructive advice and suggestions to Fylde Council in the formulation of their Affordable Housing SPD, to support Policy H4 of the Fylde Local Plan to 2032 [Local Plan]. Taylor Wimpey has a proven track record of actively delivering high quality residential properties nationally and across the North-West over a considerable number of years. Taylor Wimpey has an in-depth knowledge of the residential market in Fylde, and is keen to deliver homes and communities in the authority to ensure the authority's housing requirement is met in full over the course of the plan period. Taylor Wimpey has an active interest in delivering high quality homes in Fylde, and have most recently been pursuing planning permission on a site in Fylde known as Weeton Road, Wesham, for residential development. Taylor Wimpey considers that the site is suitable, can come forward now, and there are no technical constraints which would preclude its delivery on receipt of planning permission. Taylor Wimpey would also deliver homes on other suitable sites in the district should they become available. The Council will be aware that Taylor Wimpey previously submitted representations to the Fylde Affordable Housing SPD Scoping Consultation [AHSC] on 20th December 2018. Taylor Wimpey has viewed the Statement of Consultation [SOC] to the Draft Affordable Housing SPD, and acknowledges that the Council has addressed a number of reservations Taylor Wimpey had with the Council's approach on several specific issues. However, Taylor Wimpey remains concerned with several aspects of the Draft SPD, which will be addressed in further detail in this letter.	Not in respect of this section	Comment noted The Council welcomes this comment acknowledging the changes made to the SPD

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	Paragraph 1.4 - Taylor Wimpey welcomes the inclusion of an additional paragraph [para. 1.4] to the introduction of the Draft SPD. The introduction now includes specific reference to Policy H4 (Affordable Housing) of the Local Plan, and the role the SPD adopts in support of this Policy. Conclusion These representations have set out Taylor Wimpey's support for the adoption of an Affordable Housing SPD to support Policy H4 of the Fylde Local Plan. We trust that these representations, in response to the consultation on a Draft Affordable Housing SPD, will be fully considered and our concerns addressed in the finalisation of the SPD. If you consider that Taylor Wimpey can be of any further assistance in the preparation of the Council's Affordable Housing SPD please do not hesitate to contact us.		Comment welcomed: this was made in response to a comment from Taylor Wimpey in the scoping consultation.
Apps Legal for MW Estates	These representations are made in response to the consultation on the draft SPD on affordable housing and its application to developments for residential park homes. They are made on behalf of MW Estates Limited which owns and operates Merlewood Country Park at Little Eccleston, PR3 0YP. Residential Park Homes on a privately operated residential park Park homes are caravans falling within the legal definition of a "caravan" (s29(1) of the Caravan Sires and Control of Development Act 1960 as amended by s13(1) of the Caravan Sites Act 1968) which include maximum dimensions. They are chattels. They are built to British Standards BS3632:2015 being the latest version of the relevant standards. They are built for all year round, permanent residential occupation and require little	Not in respect of this section	Comments noted

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	maintenance. The proprietary manufacturers of these park homes, approved by the National Caravan Council build these units with comfort, accessibility and the environment in mind. They are sold with integrated kitchens and bathrooms with fixtures and fitting as standard. They are constructed with the environment and sustainability in mind and rate their park homes with energy performance certificates, even though there is no legal requirement for them to do so. The benefits of park home living can be summed up as follows: • Park homes are well designed and compact, ideal for first-time buyers and more particularly attractive to the semi-retired, retired and the elderly • Park Home Estates provide a secure, managed environment • The homes provide good value for money and come fully furnished and are tailored to meet designs of the proposed occupiers • The environmental standards are very high, resulting in modest running costs, and sound sustainability credentials • Maintenance costs are also generally much lower than bricks and mortar • Homes are sold with a 10 year Gold Shield Warranty or a Platinum Warranty similar to NHBC cover • Park homes are affordable in market terms (and in many cases "affordable" with reference to the Council's information in Appendix 4 of the draft policy – see below) • Town planning, site licensing and fire safety regulations help ensure well regulated development and consistent day to day operation. We should be grateful if the Council would take into account our representations and would make changes to the draft policy so that there is express reference to park home developments and recognition that these developments cannot be compared to bricks and mortar dwellings. We would also welcome changes to the draft policy in Appendix 5 so that park home developers are		

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	not unfairly disadvantaged because the policy is unsuitable.		
Tetlow King Planning for Rentplus	Thank you for the opportunity to comment on the draft Affordable Housing Supplementary Planning Document (SPD). We represent Rentplus UK Ltd, an innovative company providing affordable rent to-buy housing for hard-working people aspiring to home ownership. Rentplus provides an accessible route to achieve their dream through the rent - save - own model. Households rent the property for a defined period at an affordable rent and then receive a gifted 10% deposit upon purchase. Rentplus has recently been recognised by the National Housing Awards as the most innovative Home Ownership Scheme for 2019. The first section of these representations introduces the Rentplus model and sets out recent developments which underline the importance of the rent-to-buy model. The second section provides specific comments on the SPD. The third section explains the benefits of the Rentplus model to the local authority. The final section sets out a summary and conclusion. **Summary and Conclusion** Rentplus can assist in meeting local need, allocating all of its residents through the Housing Allocation Scheme; by enabling real savings to be built while renting at an affordable rent the Council can help meet the needs of low and middle income households, providing greater choice and flexibility in the planning system. Should the Council wish to discuss how affordable housing delivery and rent-to-buy can best meet local needs, please get in touch. We would like to be notified of further consultations; please notify Tetlow King Planning as agents of Rentplus by email only to consultation@tetlow-king.co.uk .	Not in respect of this section	Comments noted

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2. Policy and Guidance			
Bryning-with-Warton Parish Council	In consideration of the Supplementary Planning Document (SPD) Policy and Guidance Review (2) It was noted in Policy H4 Size and Type "Such schemes should meet requirements of 100% specialist accommodation for the elderly in policy H2".	Recommendation: This should include the disabled in addition to the elderly who can also have very differing needs in washing, cooking and sleeping but are still in need affordable housing provision.	The SPD cannot change the policy: the section concerned is a review of the policy from which the SPD draws. The reference in the Local Plan to accommodation for the elderly is because in the Borough this represents a particularly large and growing cohort whose needs therefore justify a specific Local Plan policy intervention.
CPRE	In our view, it is wrong to put the profit margin of developers, above building needed homes, including genuinely affordable ones, in the right places, where jobs and other facilities are located. The local authorities must plan for the people in the most sustainable way regarding the environmental limits of the area, and cater for the least well off to ensure we have balanced communities and homes for all. **Reliance of out of date data** Furthermore, it is bad practice, to use out of date data, so it is illogical that the Government promotes it. ONS 2016 data is the best data set to utilise, perhaps even 2018 data when available. Generally, ONS 2016 shows fewer homes are required across Lancashire. In fact, soon Fylde might be able to rely on the ONS 2018 data, to inform the planning of housing. Whatever, it is clear the Council should resist having housing requirements that are too high, otherwise it cannot achieve targets and will fall foul of the stringent Housing Delivery Tests, which leads to plans becoming out of date, and as a result more of our productive greenfields have to be released for development, with associated costs in terms of food and job security. We have observed many times in recent years a flurry of developer applications in Fylde, refused by the Council only to	None specified	The Local Plan allocates housing sites in the most sustainable manner having regard to the constraints of the Borough. Matters relating to the overall housing requirement fall outside the scope of this SPD.

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	be later granted at appeal including on our highest grade farmland (Best and Most Versatile grades 1 and 2!) A reality check in future planning is necessary. CPRE supports adequate housing for the people who need a home, particularly lower cost affordable housing options, including houses for rent. There is no evidence to show that the release of Green Belt or farmland provides the right type of housing, nor does it accelerate housing delivery, as often the land is often sold on with the planning permission and the uplift value extracted. The demands of developers should not be the only concern, but instead local economic, social and environmental good. **Brownfield** CPRE campaigns for urban concentration to better utilise previously developed, or brownfield, land in our existing settlements when homes are delivered. We advocate sustainable development, harnessing technology for cleaner energy, and reducing our demands to be compatible with climate change carbon budgets. We should reuse brownfield land to make the most of sites in central and accessible places, and not build out in rural places, which places an added burden of car dependency. Consequently, the existing built areas, which are most urban should have the most development, and require higher density with adequate green space and community facilities near to jobs. Preston and Blackpool ought to have more houses planned than rural hinterlands of Fylde and Wyre. The NPPF Section 11 does seek to encourage more Brownfield reuse, and the identification of all brownfield land in the brownfield registers is important. CPRE is urging Government to invest more in our wasted Brownfield land. Blackpool and Preston need much needed investments as do the existing towns of Fylde and Wyre. It is possible that a more comprehensive search for previously used sites is necessary as regeneration should be at the heart of the Local Plan for Fylde. Having looked at the Brownfield Registers it appear some sites have been overlooked, or classed as 'unsuitable', when in reality		The development of "brownfield" land by displacing and

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	they have potential that should be unlocked by relevant stakeholders. We would be interested in speaking to the relevant officers about this. We can mobilise our team of volunteers to help identify suitable housing sites. We have done this in Greater Manchester and Liverpool City Regions to good effect already finding some 100 hectares of additional brownfield land, not included in the Brownfield Registers. In our view if more brownfield land was recorded and higher density development provides more housing, the need to build on countryside, particularly that afforded Green Belt and Open countryside Policy protection would be avoided. Green Belt Creation We think there is scope to create new Green Belt to limit urban sprawl and protect rural places that can be enjoyed by the people of Fylde and beyond.		closing down active business uses in favour of housing in order to prevent the loss of otherwise undesignated greenfield land represents poor policy choice. Issues relating to green belt creation are outside the scope of this SPD
3. Tenures of Affordable Housing for Fylde			
Cllr Tim Armit	One quote from the report is "Affordable housing is defined in the Framework, within Annex 2 (Glossary). The Framework (2018 and 2019) definition is as follows: Affordable housing: housing for sale or rent," If the houses are for sale then this makes them houses people can afford not what I thought the definition of affordable housing was. It is key in the Fylde we build houses people can afford but isn't this straight market demand and not via providers and thus in reality just low cost housing? We have always needed houses people can afford and we are short of these but is the same demand for affordable housing?	Not specified	The definition of affordable housing from the Framework is reproduced in the document in paragraph 3.1 in order that the breadth of it be clearly understood. Affordable housing is not just for rent. The main types of affordable housing likely to be delivered in Fylde are affordable rent, shared ownership and discount market sales housing: each is explained in more detail in the chapter. Discount market sales housing is not low cost market housing: it is discounted by an appropriate percentage on its market value to ensure affordability, and retained as such in perpetuity.
Westby-with-Plumptons Parish Council	What is true market value? In the case of Westby, I would suggest the figure of 20%, for example, below market value would still NOT be affordable as a result of the type of	Not specified	The house price data in Appendix 4 has been matched to settlements

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	properties for sale boosting market rate.		
Greenhalgh-with-Thistleton Parish Council	What is true market value? In the case of Westby, I would suggest the figure of 20%, for example, below market value would still NOT be affordable as a result of the type of properties for sale boosting market rate.	Not specified	The house price data in Appendix 4 has been matched to settlements
Bryning-with-Warton Parish Council	Concern was also raised to the inconsistency of settlement groups in reference i.e. (3.21) level of discount to the open market value that will be applied to discounted market sales housing shown in table e.g. 'Warton and Freckleton, Settlement - Amount of discount -25 and Appendix 4, paragraph 3'This has allowed the LSOAs to be identified with a particular settlement with a reasonable degree of accuracy'. Warton, Westby and Freckleton have such significant differences the rational of calculations is clearly absent and for clarity it is difficult to follow how the concluded discounts are actually calculated.	Recommendation: Greater clarity as to how the discount figures are arrived at.	The methodology for the calculation is set out in paragraphs 3.18 to 3.20. The amount that could be raised by the typical lower-quartile home buyer in the borough is related to the lower quartile house price data in different areas of the borough. The detailed calculations are shown in Appendix 4 and further explanation is given in the introductory text to Appendix 4. The alignment of the settlements with the LSOAs is shown in the table on pages 55 and 56, where the individual LSOAs are identified by ward, and then grouped by settlement. There are variations within settlements, but it is not considered that the evidence would be strong enough to apply different levels of discount within different areas of a single settlement. Warton and Freckleton taken separately would give figures of approx. £138,000 and £135,000 respectively which would not justify considering them separately or applying a different figure from 25%. The groupings have been used to prevent data outliers from resulting in unrealistic levels of discount. The Parish Council, whilst criticising this element of the document, offers no indication as to what it considers the appropriate discount level should be, despite provision of the raw data in the document.
Bryning-with-Warton Parish Council	On a general observation note the Parish Council express concern that as outlined in Section 3.Tenures of Affordable Housing for Fylde (3.1) c & d these systems professing	Recommendation: To remove these explanations from the	Discount market sales housing is an integral part of the affordable housing mix as a low-cost route to home ownership. It should be noted that paragraph 64 of the

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	subsidised route to home ownership is significantly flawed and is building problems for the future. C. Discounted market sales housing: how can that possibly or logically work ' for future eligible households' and remain integral to the surrounding privately owned properties as a mixed community? D. Other affordable routes to home ownership: Serious consideration of this paragraph, other than shared ownership, again are unworkable in the future once any part ownership is achieved. High ideals but completely impractical in actual fact.	SPD and make reference to NPPF as the guidance document thus removing the need for future amendments to the document when these schemes fail	Framework requires that 10% of homes on major sites should normally be for affordable home ownership. The mechanism by which it operates is explained in the SPD.
CPRE	The Government, in our view uses the wrong definition of affordable housing in the National Planning Policy Framework. It includes market starter homes that are only on offer at 80% of market value at the first point of sale. Thereafter they are not affordable, but whatever the market will pay. We urge for more social and private rented properties that are affordable permanently. We have also seen 'Right to Buy' in rural places deplete the stock of register providers. In rural areas we think 'Right to Buy' should be scrapped.		Starter homes, although included within the national definition, are only one from a number of types of affordable housing. The Council's preferred mix has not included starter homes, preferring discount market sales housing instead which secures the discount in perpetuity. Right-to-buy is a matter of national policy, but does not form any specific measure within the SPD. The Council seeks to retain properties as affordable where possible, and measures to achieve this are set out within the SPD. The section on shared ownership will be modified to incorporate reference to and the Council's policy on Designated Protected Areas, which prevent the loss of units in rural areas through staircasing.
Lichfields for Taylor Wimpey	Paragraph 3.5 - Taylor Wimpey notes that no specific tenure requirements have been included within the Draft SPD, and fully agrees with the flexible approach that has been adopted. Taylor Wimpey supports the requirement to provide a mix of tenures for developments of 15 or more affordable homes, but maintains that more universally accepted wording should be used to describe the required mix, as an alternative to a 'basket' of tenures [para. 3.5]. Paragraph 3.21 - Taylor Wimpey strongly disagrees with the		Support welcomed The Council is satisfied that "basket" is a suitable collective noun for tenures of affordable housing on a development site

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	required level of discount to open market value to be applied to discounted market sales housing in the following settlements: 1 Elswick, Singleton, Weeton and Staining (40% discount); 2 Lytham (40% discount); and, 3 Wrea Green (40% discount). Taylor Wimpey considers that a discount of 40% is significantly higher than would be expected, and no reasonable justification has been provided to diverge from the widely accepted 20% reduction, which would typically be applied for discounted market sales housing. Para. 3.20 states that "The discount applicable for the different areas of the borough has therefore been pitched to make the dwellings as affordable as possible whilst remaining viable for the developer as part of the affordable housing mix". Taylor Wimpey notes that the requirement for this higher level of discount has not been considered as part of the Council's viability evidence which underpinned the Local Plan, and the assertion that 40% discount would still remain viable for the developer as part of the affordable housing mix has not been sufficiently justified. The Planning Practice Guidance1 [Practice Guide] sets out that that SPDs "should build upon and provide more detailed advice or guidance on policies in an adopted local plan". However, the Practice Guide also states that SPDs "should not add unnecessarily to the financial burdens on development". The Draft AHSPD should not therefore introduce new requirements which were not considered as part of the viability evidence tested at examination. Taylor Wimpey considers that this required level of discount for market sales housing is unreasonable, and imposes an unnecessary financial burden on development which has not been sufficiently justified through the adopted Local Plan. In summary, it is therefore considered that the Council reduces		The explanation and evidence for the level of discount is provided in Appendix 4. In the settlements concerned, a level of discount lower than this would not provide for those in need of affordable housing, and therefore it is questionable as to whether units created at that discount level could be considered affordable housing. The 20% discount noted by the representor is the minimum reduction required to meet the national definition, rather than any benchmark or average. The Local Plan viability assessment found that development throughout the Borough is viable. The analysis in Appendix 4 has identified the high-value locations in terms of house sale prices, based on up-to-date data. The representor offers no evidence that development would be unviable with the discounts required for the settlements concerned. The level of discount for discount market sales housing was not specified within the Local Plan. The variation in discount reflects clear differences in the open market value of the same dwellings between different settlements. To impose a single standard discount rate in those circumstances would be unjustified. The Government's consultation on First homes states that a standard discount of 20% has been found to be

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	this level of discount to a more reasonable, widely accepted level.		insufficient to ensure affordability. The Council agrees.
Apps Legal for MW Estates	Executive Summary The relevant section of Policy H4 provides: *"The presumption is that affordable housing will be provided on the application site so that it contributes towards creating a mix of housing. In circumstances where the Council considers that affordable housing would be most appropriately provided offsite, for instance in relation to applications for residential park homes, the Council will require contributions for off-site provision of affordable housing"* There is no detail in the draft SPD about park home developments and why a park home development cannot provide affordable housing on site. Provision should be made in the draft to take into account the particular characteristics of a park home development. As there is a presumption that affordable housing will be provided on the application site, when it comes to land for the development of park homes consideration should be given in the policy to any objective affordable accommodation, taking into account the information in Appendix 4. Park homes generally have a one to two bedrooms. Park homes are either sited and sold with the benefit of an agreement under the Mobile Homes Act 1983 (as amended) or they are sited and let out on the basis of a residential contract pursuant to the Caravan Sites Act 1968 or an AST under the Housing Act 1988. Therefore park homes will either be owner-occupied or let out by the site owner. These are the only two forms of tenure existing on a privately operated residential park.	Provision should be made to take into account the particular characteristics of a park home development. The SPD should accept the delivery of on-site affordable housing on park home sites	There is no tenure within the definition of affordable housing set out in the Framework that is deliverable through the provision of park homes. Registered Providers will not accept park homes to be part of their portfolio of properties. Policy H4 is clear that it is for the Council to determine the appropriate means for affordable housing to be provided in connection with a development proposal. Comment noted.

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	On site affordable housing and target price We refer to Appendix 4: Discount Applicable for Discount Market Sales Housing. The entire social housing model is based on a market failure where either (or both) homes are not being built and sold cheaply enough or that people aren't being paid enough to be able to buy what is available. The social housing model exists to seek to correct that imbalance by providing housing at a value below market that is affordable for people on lower incomes. Notwithstanding the point above regarding the artificiality of the process to establish a nominal transfer price, we have considered the approach being taken by the Council to discounts (and by extension, off-site contributions). The Council has identified, for various areas, a lower quartile house price. This is drawn from statistics available from ONS. Park home sales/ values are not incorporated into these statistics because the sale of a park home and creation of a new agreement under the Mobile Homes Act 1983 (as amended) or the assignment of an existing one is not registrable at HM Land Registry. Therefore the figures are flawed in this regard. Clearly, different areas have different house price profiles and hence the figures given in Appendix 4 range from £128,039 in St Annes to £244,995 in the Rural South. Also assumed is a lower quartile income of £21,445 for the entire District. From this and working from a standard assumption about deposits and income multipliers, Appendix 4 establishes degrees of affordability (or not) of housing in the various geographical regions. Paragraph 3.18 of the draft policy sets a target house price of £107,225. In other words, if a house was available for £107,225 or less, it would be deemed to be 'affordable' for an individual receiving the lower quartile salary. This 'limit of affordability'		ONS house price data is recommended by PPG in calculating affordability This calculation is made for the discount level for discount market sales housing (and will now also be used for calculating off-site contributions).

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	thereafter drives all of the discount rates. We are enclosing two independent valuations for single unit park homes at the site ranging from £95,000 and £110,000. These give an average of £102,500 for a two bed park home, single unit caravan. Following the logic of the calculations in Appendix 4, such a home is, objectively, 'affordable' since it is below the Council's target value. Therefore, depending on the site, the park home developer may well be offering a form of "affordable" accommodation and the Council should allow for consideration of this and to provide that it may be possible for park home developers to provide a form of on-site affordable housing. The Council should not automatically assume that a park home development is suitable for the provision of an off-site affordable housing contribution and seek to require the developer to apply the calculation which we have already explained is not appropriate for a park home development. We would urge the Council to a policy which allows the Council to take into account the objective market valuations of park homes to be sold on the relevant site against the target prices recorded in Appendix 4 before any off-site contribution is considered. **Other** We would also add that we are aware of a residential park in Bedfordshire which offers homes to people within the Central Bedfordshire accommodation at an affordable rent. This appears to be a collaboration with Central Bedfordshire Council. We are enclosing relevant information about this as well as information about the nature of the unit which is being offered through the Council to local residents who meet a specific criteria. This emphasises the point that affordable housing can be provided on site.		The current Local Plan policy does not debar the Council from considering on-site provision on park home sites, but the Council would need to consider that the proposed units would be suitable to meet the affordable housing need as it exists in the Borough. Comment and information noted. It is at the Council's discretion as to what type of affordable housing is required in connection with any residential development proposal. Policy H4 and the SPD do not prevent a similar arrangement being made if the Council considered it suitable.
Tetlow King	**Introducing Rentplus**	Addition of section	The Council accepts that Rent-to-Buy is a tenure that

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Planning for Rentplus	The Rentplus model of affordable rent-to-buy, aims to help those hard-working families and households unable to access ownership either through shared ownership, starter homes or homes on the open market, to overcome the mortgage 'gap'. This is achieved through a defined period of affordable rent, during which all Rentplus residents are able to save towards a deposit. It is important to note that in 2018 the National Planning Policy Framework (the 'Framework') was revised to incorporate a wider definition of affordable housing, now providing four categories; rent-to-buy is included within category d) Other affordable routes to home ownership. Each scheme delivered by Rentplus offers a unique, affordable route to home ownership through affordable rented housing, set at the lower of 80% market rate (affordable rent) or Local Housing Allowance, including any service charge, with a planned route to ownership at years 5, 10, 15 or 20 after first occupation. The most important difference to other affordable tenures is that households are able to save for a mortgage deposit while renting the same home at an affordable - intermediate rent, with a 10% gifted deposit to assist with the purchase. Whilst doing so, households can build their credit history, to assist with mortgage applications. The new Housing Minister, Esther McVey highlighted the importance of Rent to Buy in her first speech to the RESI Convention (12th September 2019). In talking about the Government's drive to increase home ownership she stated that it includes "Rent to Buy, so people can rent knowing that they are going to buy, knowing that they've got a bit of breathing space, maybe it's in 5 years, maybe it's in 10 years, but they will get to own that property - so they can plan, knowing they have the certainty of getting a deposit and getting that house." These supportive comments concisely summarise the Rentplus model described above which currently provides a home for 650 households across the UK. Her comments not only reinforce the Framework's provision for additional affordable housing routes	concerning rent-to-buy within Chapter 3	Government is encouraging, and other Registered Providers have engaged with the Council seeking to bring it forward on sites. Whilst it may not be suitable in all cases, the SPD will benefit from the inclusion of a section of guidance added in relation to this tenure. It will not include all elements of Rentplus' specific scheme.

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	to home ownership, but also endorses directly the work of Rentplus. A further recent development - The Affordable Housing Commission, chaired by one of the pre-eminent voices on affordable housing, Lord Best, published its interim report Defining and Measuring housing affordability – an alternative approach in June 2019 . This was produced in response to the difficulties that the standard measure of affordability, comparing house prices to incomes, poses in recognising housing stress and affordability across the housing spectrum. The report proposes recalling the approach of measuring affordability by reference to rents or purchase costs exceeding one third of household income (for those in work) in order to better pose a pro-active and interventionist response to housing difficulties. This follows recent work which suggests that the probability of housing stress increases with housing costs exceeding a quarter of gross income on rent. The Commission also highlights the findings of numerous surveys which state that the majority of tenants and adults living with parents aspire to own their own home; of the 5.5m 'frustrated first time buyers', 1.6m are in the private rented sector. This group is one of four the report identifies as having particular needs and housing stresses, and who can't buy "mainly because of the time needed to save for large deposits". These numbers represent an increase of 0.6 million renters since 2010, many of whom are paying over 40% of household income on rent. The report recognises the well-known problem that many households in the private rented sector are likely to have multiple affordability issues, exacerbated by insecurity of tenure and poor-quality living standards. The report states that "good quality homes of the right size for the household is seen as a basic minimum"; while this is a generally accepted principle in the delivery of housing, and in particular of affordable housing across England, this can be difficult to achieve through the planning system which does not		

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	adequately reflect the variations in household needs. The decrease in the numbers of households able to access home ownership is in large part due to the time taken to save for a mortgage deposit without the help of the 'Bank of Mum and Dad'. The Affordable Housing Commission notes that "those just able to buy are likely to have to save for an unrealistic period or unlikely ever to be able to raise an adequate deposit" – for the purposes of assessing the numbers of would-be purchasers, the Commission 'cuts off' the savings period at 'just' five years. The difficulty in saving for a deposit is one of the most critical barriers to home ownership, and the focal point for Rentplus – providing a clear route and time period for working households, including those with children, to save. Using the Commission's proposed measure of affordability would better capture the needs of struggling first-time buyers, many of whom are otherwise likely to remain trapped in insecure private rented sector accommodation. **Comments on the Draft SPD** The SPD discusses 'innovative affordable housing tenures' at paragraphs 3.25 and 3.26; the SPD indicates that the Council will take a flexible approach to these and is willing to discuss different approaches through the pre-application process. This overall approach is welcomed; by taking a flexible approach, the Council will be better placed to facilitate the delivery of affordable housing across all types and tenures, including through other affordable routes to home ownership as required by the Framework. That being said, the SPD would benefit from further specific discussion of 'other affordable routes to home ownership'. This will provide clarity to applicants and stakeholders at an early stage of the planning process, for example, in the initial formulation of development proposals. Rent to buy is becoming increasingly established across the country; Rentplus has been actively delivering new homes across the South West, the		

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	Midlands and the East of England in recent years. Rentplus is expanding its geographical reach and has recently appointed area managers including in the North West. As such, although rent to buy is an innovative product, it is certainly not an 'unknown quantity'. Accordingly, the SPD should include an explanation of the rent to buy model at paragraph 3.26. This will provide meaningful guidance to relevant stakeholders and to inform development proposals. It will also help support the delivery of rent to buy products (including the unique Rentplus model) and achieve significant economic and social benefits for residents of the Borough of Fylde. To this effect, Rentplus would welcome the opportunity to meet with the Council's planning and housing officers to explore the potential of rent-to-buy to meet the needs of households and families in Fylde. **Benefits of the Rentplus model** The Rentplus model offers the opportunity for the Council and Registered Providers (RPs) to diversify the local housing offer without further recourse to public subsidy. The affordable rented period provides families and households with security of tenure, with certainty of management and maintenance by a local partner RP, and critically the opportunity to save towards purchase. As affordable rent to buy meets needs for affordable rent (the only difference being marked by the expectation by all parties of purchase), it comes with a significant benefit of freeing up existing affordable rented homes for others in priority need, as demonstrated by Rentplus schemes across England. Rentplus undertakes rigorous affordability testing of potential purchasers to ensure that this is a realistic expectation and can be achieved within the set timeframes of five to 20 years. This means that substantial discounts at the point of purchase are not required, as it is the inability to save for a mortgage deposit or other financial issues that prevents a significant number of households from accessing ownership, and not the ability to		

Consultee	Key text from representation	Changes sought	Council Response
	service a mortgage over the long term. Working with local authorities to meet local priorities is critical to the success of the Rentplus model of affordable rent to buy, as helping hard-working local households and families access ownership reduces the pressure on the housing waiting list. This frees up local authority and housing association time to focus on meeting priority needs for social and affordable rented homes.		
4. The Amount of Affordable Housing Required			
Cllr Tim Armit	From the numbers here if a developer wants to build 1000 houses then around 300 of them must be affordable housing, which in old language is council housing in a new deliver manner. Do we have such demand that one third of Fylde residents need such homes? Do we have to provide homes to non Fylde residents and try to market to attract residents for these homes? In terms of "criteria" the report lists - Applicants must therefore be able to demonstrate they meet one or more of the following criteria: • Local residency – they have lived in the local authority of Fylde continuously for the last three years; • Permanent employment in the area of Fylde or offer of permanent employment that is intended to last for at least 12 months; • Close family association – has a parent, adult child, adult brother or sister who is living in the area of Fylde and has done continuously for the last 5 years; • Applicants who are serving in the Armed Forces and who are either employed or are resident in the area of Fylde; and • Former armed forces personnel who had a previous residence in the area of Fylde as a result of a former posting in the area of Fylde within the last 5 years. This is quite a restrictive list and to fill 300 homes out of 1000 as an example this seems impossible to relate to, unless we include the high paid BAE and other areas £60,000 earners as being our target market as shown above. As stated we do need houses for our younger families, our	Not specified	The requirement of 30% affordable housing is written into Local Plan Policy H4 and derives from the findings of the Fylde Coast SHMA and its Addenda, which identified a need of 249 net additional affordable homes per annum in Fylde. The SPD must be in accordance with Local Plan policy. Affordable housing covers a wider range of tenures and types than traditional council housing, and this is explained in the SPD. The Consistent Lettings Policy operated by MyHomeChoiceFyldeCoast includes the local connection test to ensure that any affordable housing is provided to fulfil those who are in need of affordable housing in Fylde. Affordable housing includes housing to buy as well as to rent, and shared ownership schemes. In each case, there is a level of discount, as explained in the SPD. The discount for housing for sale will be varied, as explained in the SPD, based on the varied affordability in different parts of the Borough. Affordable homes of whichever tenure require delivery, either directly by the developer (where for sale), or through a Registered Provider (where for rent). To be

Consultee	Key text from representation	Changes sought	Council Response
	home leavers and first time buyers but unless the terminology has changed houses you can afford are no Affordable housing. What is the history of take up of such homes in the last 5 years? How often are they then sold on to the commercial market via the tenant? What is the logic and proven history that mixing in levels of income and lifestyles improves life for all parties? We see at school the children on PP are often found to suffer when in groups of wealthy children and is causes more issues than benefits. Do affordable housing tenants want to live with 5 bedroom mansion buyers or is this a well meaning Govt strategy based on dreams not reality? Para 4.7 touches on this but provides no evidence of this working or being wanted by people involved – bad policy makes bad results for the sake of it. If we implement bad policy we have to pick up the pieces later and we create the inevitable "viability" challenge. If we set realistic policy we are more likely to achieve our aim and get developers to work with us and then everyone wins. How much of this is in our gift and not national policy?		deliverable requires the units to be taken up in accordance with the policies. Affordable housing delivery has increased substantially over the last 5 years. Provisions are in place to ensure that, where resold, the property remains discounted to market value. All affordable rent homes are subject to right-to-buy legislation, but this would never justify not providing affordable homes to those in need in the first instance. A segregated approach would not be in accordance with the Framework. Paragraph 4.7 refers to Local Plan Policy H4. The SPD must be in accordance with the policies of the Local Plan. This policy has been subject to Examination and found sound. It has also been subject to viability testing at the plan-making stage. As Local Plan policy, there is no reason why it should not be implemented.
Westby-with-Plumptons Parish Council	One further area of concern is the developer attempting to bypass the scheme by building in batches of 9 properties - we presume this will be monitored.	None specified	Where 9 units is at an appropriate density for the site, it will be policy-compliant. However, if the density is lower than required by Policy H2, or where the applicant is attempting to circumvent the requirement by bringing forward the site with multiple applications, the Council will require revisions to the scheme to ensure policy compliance, including the provision of affordable housing.
Greenhalgh-with-Thistleton Parish Council	One further area of concern is the developer attempting to bypass the scheme by building in batches of 9 properties - we presume this will be monitored.	None specified	Where 9 units is at an appropriate density for the site, it will be policy-compliant. However, if the density is lower than required by Policy H2, or where the applicant is attempting to circumvent the requirement by bringing

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			forward the site with multiple applications, the Council will require revisions to the scheme to ensure policy compliance, including the provision of affordable housing.
CPRE	The Government's standard method is deeply flawed. It pushes housing growth into the countryside. It is based on an overly simplistic 'supply and demand' economic theory, ignoring the fact that houses are not used just as homes, but very often capital investments. The affordability ratio simply pushes houses to areas of high demand, irrespective of environmental capacity, high grade of farmland and threatens unnecessarily our rural areas.	None specified	The SPD does not make policy. Local plans must conform to government policy in order to be found sound.
Lichfields for Taylor Wimpey	Paragraph 4.16 - Taylor Wimpey broadly agrees with the Council's expectation that affordable housing will be constructed concurrently with the market housing on the development site, and supports the requirement to detail the phasing of affordable housing delivery with the Affordable Housing Statement, where the application is for full or reserved matters permission. Furthermore, Taylor Wimpey considers that the requirement set out at para. 4.16, that at least half of the affordable homes should be transferred before half of the market housing is occupied, is a reasonable approach.		Comment noted
	However, Taylor Wimpey disagrees with the requirement to transfer the remaining half of affordable homes before the occupation of 75% of the market homes on site, i.e. 50% of affordable housing to be delivered between 50-75% of the market homes delivered on site. Large residential schemes will typically require a significant amount of enabling infrastructure towards the early stages of construction, which consequently incurs significant up-front cost for the developer. Taylor Wimpey therefore considers that this requirement could have an adverse impact on a developer's ability to maintain an appropriate level of cash flow throughout construction, which could subsequently have implications for delivery. Furthermore, Taylor Wimpey	Transfer of the remaining half of affordable homes should be delivered concurrently with the remaining 50% of the market housing on the site	The Council recognises that there is the potential for this to be an issue especially on very large sites. However, only requiring delivery of the remaining affordable units before all of the remaining dwellings would allow developers to circumvent provision. The threshold has therefore been raised to 85% of homes and subject to negotiation, which provides the developer enough incentive to ensure the affordable units are actually provided.

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	considers that limited regard has been given to: 1 The flexibility required in build routes throughout the construction process; and, 2 The likely demand and take-up rates of units by Registered Providers as a build progresses. In addition, Taylor Wimpey considers that this requirement is likely to facilitate the development of clusters of affordable housing, if a large proportion of affordable housing (50%) is required to be delivered between 50-75% of the market homes delivered on site. This potential for clustering of affordable housing would directly contradict with paragraphs 7.21-7.22 of the Draft AHSPD, which relates to the distribution of affordable housing across a development site. Para. 7.21 states that *"Housing developments should not be 'exclusive'… Affordable housing should therefore be distributed within the development so that is clearly integrated into the wider development site"*; and Para. 7.22 continues to state that *"Normally the expectation will be for affordable housing to be distributed in several small groups throughout the development site"*. Taylor Wimpey considers that this requirement may hinder a developer's ability to achieve an appropriate distribution throughout a site. Taylor Wimpey considers that there is no clear justification for the inclusion of this requirement within the Draft SPD, and notes that the Council must ensure that any such requirement does not adversely impact on the delivery of housing. As such, Taylor Wimpey suggest that the transfer of the remaining half of affordable homes should be delivered concurrently with the remaining 50% of the market housing on the site, rather than before the occupation of 75% of market homes.		
5. Pre-application Engagement			

Consultee	Key text from representation	Changes sought	Council Response
No comments made regarding this section			
6. The Affordable Housing Statement			
Lichfields for Taylor Wimpey	Paragraph 6.2 – Taylor Wimpey's representations to the AHSC provided comments on the possible requirements for Affordable Housing Statements. Taylor Wimpey notes from the SOC on the AHSC, that the Council disagrees with Taylor Wimpey's comment that the requirement to include an appointed Registered Provider within the Affordable Housing Statement is not appropriate. Para. 6.2 of the draft SPD requires that where an application is in outline form, the Council will require appointment of a Registered Provider to take the housing stock, and evidence of the provisions to transfer stock to them. Taylor Wimpey maintains its previous view that this is not appropriate. It is unlikely that an agreement with a registered provider would have been reached at this (outline) stage in the application process. Taylor Wimpey would ordinarily reach an agreement with a Registered Provider after the grant of planning permission once the certainty of outcome, including the housing quantum and mix, has been secured. As such, Taylor Wimpey requests that this requirement is removed for outline applications.	Removal of this requirement at outline stage.	The Council does not expect that developers will have entered binding agreements with register providers at outline stage but requires evidence that the delivery of on-site affordable housing is achievable. The text has been changed to state: "6.4 Where an application is submitted in outline, applicants will be expected to set out how their development will deliver affordable homes in line with development plan policy"
7. Size, Type, Design and Distribution of Affordable Housing			
Cllr Ben Aitken	… however: the section after page 25, on the size type etc of affordable houses; there was absolutely nothing on Carbon Reduction, eco standards or the progress towards heat sustainability in the new properties. Crucial need.	Measures for carbon reduction, eco standards or the progress towards heat sustainability in the new properties	It would not be appropriate to restrict any requirements of this kind to affordable housing: they would need to be within the design requirements for all dwellings. These issues can be considered within the forthcoming Good Design SPD.
CPRE	We must have policies that achieve the Government's advisory 10% Biodiversity Net Gain. Despite promises the Government	Not specified	This is not considered appropriate in a document that deals very specifically with affordable housing, but it is

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	has not delivered the mechanism for achieving BNG at 10% and it is incumbent on local planning authorities to have SPDs that provide a policy control. Most authorities do not have the enabling policy for this and it is so important in future they do. We have to embed policies that are good for our climate, biodiversity if we are to have healthy natural environments. Fylde must cater for its aging population, with quality sheltered and supported housing, and also provide affordable homes for younger households in the needed tenure and size.		dealt with in detail in the Biodiversity SPD. There is policy provision for sheltered housing schemes to be provided as part of any affordable housing mix on sites, within Local Plan Policy H4.
Lichfields for Taylor Wimpey	Paragraph 7.11 – The Draft AHSPD sets out that at the outline stage, the type of affordable dwellings proposed will be declared descriptively within the Affordable Housing Statement accompanying the application. (e.g. "15 houses and 5 bungalows for affordable rent and 10 flats for discount market sales housing"). Taylor Wimpey considers this requirement has no policy justification, is overly prescriptive and unnecessary for inclusion within an affordable housing statement at the outline stage. It is unlikely that the exact mix of affordable dwelling types would be agreed at this stage, and this proposed level of detail would typically be decided through a more detailed application, such as a full or reserved matters application. As such, Taylor Wimpey considers that this requirement should be removed from the Draft AHSPD.	Remove requirement to describe dwelling types at outline stage	The requirement for an Affordable Housing Statement at outline stage has been removed. It is recognised that an applicant can choose not to include any breakdown or description of dwelling types at outline stage. Where the mix is specified, it will be required to comply with policy, but specific requirements for the declaration of details of the affordable housing mix have been removed for the outline stage.
8. Off-site Contributions			
British Holiday & Home Parks Association	1. The British Holiday & Home Parks Association (BH&HPA) is the UK's national representative body of the parks industry. 2. We write in response to the Draft Fylde Affordable Housing, Supplementary Planning Document November 2019 to express our deep concern that the specific and affordable nature of park home development is not appropriately addressed.	Not specified	

Consultee	Key text from representation	Changes sought	Council Response
	3. The revised definition of affordable housing in the National Planning Policy Framework (NPPF) now includes 'discounted market sales housing' that is sold at a discount of at least 20% below local market value and remains at a discount for future eligible household. Park homes are sold at a third to a half of the price of equivalent brick-built bungalows in the same market area and remain more affordable in perpetuity by dint of their unique form of tenure. 4. Single-storey park homes provide an important source of housing to meet a critical national and local need for homes for independent living by older people. 5. When the Council is willing to recommend approval in return for affordable homes (or a contribution) it is farcical to ask for a contribution equivalent to the provision of the number of brick-built homes that would have been provided if the application had been for brick-built homes. Given park homes that sell at a substantially lower price, they cannot provide the level of profit to pay such a contribution. The amount that can be provided as affordable housing contributions, while still providing a reasonable developers profit, is substantially lower. 6. We therefore ask that you address Policy H4 and Appendices 4 and 5 to appropriately reflect the unique nature of park home development rather than as currently drafted, presenting a barrier preventing park home development so denying the opportunity of affordable, bungalow-style homes to older members of the community.		The difficulty presented by the guidance as drafted is recognised, and was reflected in a recent appeal decision. Chapter 8 and Appendix 5 have been amended to ensure that the contribution required relates directly to the type of development proposed on the site, so that the discount will be applied to the open market value of park homes. Other alterations are made to simplify the calculation. Appendix 4 does not need addressing as this merely considers the different levels of discount required in different settlements, which should apply equally to any type of development.
Apps Legal for MW Estates	**Executive summary** It is unworkable and unrealistic to apply the same calculation for any off site contribution due on a park home development to a development of traditional bricks and mortar houses in accordance with Appendix 5.	Not specified	The difficulty presented by the guidance as originally drafted is recognised, and was reflected in a recent appeal decision. Chapter 8 and Appendix 5 have been

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	Chapter 8 Off-site Contributions Park Homes and the Social Housing Sector We refer to Appendix 5: Calculations of Contributions Required for Off-Site Affordable Housing. The calculation is predicated on a mix of affordable dwellings appropriate to the housing need in the settlement concerned. It requires a hypothetical assessment of a mix of affordable homes using the table provided which may be re-modelled as appropriate. The draft policy requires an open market valuation of an example of each of the property type to be undertaken by two RICS-accredited valuers and the average taken. The valuations are to assume that the notional properties would be built concurrently with the remainder of the development on site. The transfer value of these homes is then to be assessed in association with RPs. Policy H4 refers to residential park home developments and provision of an off-site affordable housing contribution and yet the information in Appendix 5 bears no relevance or similarities to a park home development. It is not appropriate to treat a park home development in the same way a development of traditional bricks and mortar housing. The draft policy requires a park home developer to compare their site with a bricks and mortar housing development and how the land might be developed if it were for traditional dwellings and the sort mix of affordable dwellings which could be accommodated on the land. It requires a park home developer to obtain valuations from RICs surveyors of a mix of affordable housing which the developer could provide if the site were for traditional housing at the same time taking into account the valuations of the “actual dwellings proposed to be constructed on site”. These dwellings being park homes. We doubt whether any surveyor would wish to carry out any instruction to provide such a valuation or understand the necessity of providing such a valuation when the site is for park homes.		amended to ensure that the contribution required relates directly to the type of development proposed on the site, so that the discount will be applied to the open market value of park homes. Other alterations are made to simplify the calculation.

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	In relation to establishing transfer values, the draft policy requires the involvement of RPs to provide a transfer value on the provision of a notional mix of affordable housing, on land to be developed for park homes. We are not aware of any instances of RPs bidding for, purchasing, commissioning or otherwise being involved in the supply of park home sites as part of a portfolio of affordable housing. An RP, constrained by the operation of the Mobile Homes Act 1983 (as amended), would not be able to take on units on a site and would instead have to operate a site. We find support for our assertion in Appendix 1: List of Affordable Housing RPs with housing stock on Fylde. According to the websites for each RP listed, not one of these RPs have park homes as part of their housing stock. Even those with accommodation for independent living for the over 55s make no reference to park home living. We consider that it is unlikely that any RP would want to incur time and effort providing a transfer value of these homes. The draft policy requires park home developers to enter into negotiation with a RP with whom they are never going to have any sort of commercial relationship, since there will never actually be any transfers of park homes to RPs. Assuming that the developer paid for the RP to be involved and they accepted that offer, they (and a surveyor for the open market valuations) are then going to be asked to generate a value for nominal properties that don't and won't ever exist on a site that isn't appropriate for that type development. Developers of park home sites will show an agent a plan for single and twin unit caravans and ask them to give a valuation for a 4 bedroom house and a 1 bedroom flat. We do not consider that this policy is workable or realistic for park home developments. The application of the policy as it stands to park home developments could prevent the progress of applications for park homes because the policy is couched in terms which are impossible for the developer to meet.		

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9. Management Arrangements			
Cllr Tim Armit	Firstly what is the criteria for someone to gain access to affordable housing …? I note in the report its states "Affordable housing, of whichever tenure, should only be allocated to those with a maximum of £30,000 in savings and a maximum household income of £60,000. This is in accordance with the criteria used by MyHomeChoiceFyldeCoast for eligibility to bid" This is extraordinary and above most of my friends and colleagues expectations in life. Given the average salary is £23500 and that the criteria for PP at school is a household income under £21,000 and 25% of Lytham school children are PP this threshold makes no sense what so ever. A £60,000 household on top of enormous savings to be classified as appropriate for Affordable Housing is not realistic, required or meeting any poverty based or low income based criteria, this is an insult to hard working families and oddly enables 40% tax payers to be considered for Affordable Housing, we can not align to this and must challenge it.	Not specified	The savings and income limits are set by MyHomeChoiceFyldeCoast. MyHomeChoiceFyldeCoast is governed jointly by Fylde, Wyre and Blackpool Councils. The average earnings in Fylde (workplace-based) is £36,215[1]. However, the calculation of discounts for discount market sales housing in the SPD is based on ensuring affordability for those at the lower quartile earnings of £21,445[2] Affordable rent homes must be offered at a rental of no more than 80% of the market rate, in line with national policy: this ensures that they are within reach of people unable to access market housing in the locality. It is presumed that "PP" is a reference to Pupil Premium, a supplement to education funding based on income. The Council recognises the limited value of the salary/savings cap, but the Council's allocation policy gives priority to those in greatest need.
Westby-with-Plumptons Parish Council	The parish councils applaud the inclusion of affordable housing policy in housing developments of 10 or more properties. However, there is a real concern relating to the focus of the housing - that is to say, that the research into the demographic need should be completed prior to construction in order to ascertain the age bracket being targeted. Additionally, as has happened in both Weeton and Wrea Green, the criteria to be met by applicants has not focused (or been implemented successfully) to encourage local house-hunters to apply - Residences have been taken by applicants with no link to the villages from as far afield as Manchester.	Not specified	The SPD is intended to assist the implementation of Local Plan policy. Policy H4 provides for affordable housing in rural settlements to provide for the closest Tier 1 or Tier 2 rural settlement, with the remainder for Borough-wide needs. The SPD includes the local connection test for allocations of housing within rural settlements, which applies this criterion. Parish Councils can encourage take-up by local applicants by providing local publicity.

[1] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian .
[2] *Ibid.*

Consultee	Key text from representation	Changes sought	Council Response
Greenhalgh-with-Thistleton Parish Council	The parish councils applaud the inclusion of affordable housing policy in housing developments of 10 or more properties. However, there is a real concern relating to the focus of the housing - that is to say, that the research into the demographic need should be completed prior to construction in order to ascertain the age bracket being targeted. Additionally, as has happened in both Weeton and Wrea Green, the criteria to be met by applicants has not focused (or been implemented successfully) to encourage local house-hunters to apply - Residences have been taken by applicants with no link to the villages from as far afield as Manchester.	Not specified	The SPD is intended to assist the implementation of Local Plan policy. Policy H4 provides for affordable housing in rural settlements to provide for the closest Tier 1 or Tier 2 rural settlement, with the remainder for Borough-wide needs. The SPD includes the local connection test for allocations of housing within rural settlements, which applies this criterion. Parish Councils can encourage take-up by local applicants by providing local publicity.
Apps Legal for MW Estates	With very few bungalows being built and an aging population, there is a demand for this sort of unit of accommodation which is affordable in market terms, and more accessible to people with physical disability and who use wheelchairs. They are also attractive to an older age group looking to downsize which in turn frees up larger houses into the housing stock. Residential park operators often operate an age restriction which is lawful under the relevant exemption to the Equality Act 2010. Such an age rule means that no one under a specific age is entitled to reside in a park home. Children are allowed to visit but cannot occupy the homes on a permanent basis where there is this form of restriction enshrined within the park rules and lodged with the local authority. Most park homes are occupied by couples or people living on their own.	Not specified	Comments noted. The Council welcomes the provision of accommodation designed specifically for the elderly but requires certain specific measures incorporated through Policy H2, which may not be straightforward to provide through park homes.
10. Viability Appraisal			
Bryning-with-Warton Parish Council	On a positive note Councillors particularly welcome the proposed Viability Assessments outlined in Policy H4 Viability expanded at Section 10 and notably (10.5) 'Where a developer proposes a lower number of affordable homes than the 30%	None specified	Transparency is required by national guidance: see PPG Paragraph: 021 Reference ID: 10-021-20190509

Consultee	Key text from representation	Changes sought	Council Response
	requirement, Local Plan policy H4 requires:" robust financially-based justification to be provided by the applicant, demonstrating that the development would be unviable with a higher level of affordable housing then proposed". While it is accepted such negotiations are between the developer and the Planning Authority, Fylde Borough Council, it is hoped full transparency will be made for reference by the respective Town and Parish Councils, before approval granted. Given the difficulty in enforcement by the Borough Council of blatant breeches to planning applications by current developments being undertaken in Warton the Parish Council can only hope there will be more robust consequences for the developers for not fully complying with the Policy.		
CPRE	There must be a policy wording that can prevent developers from so agreeing equitable affordable housing contribution at the time of the grant of permission, only to renege on these at a later date. We have repeatedly called to the Government to close the viability loophole that allows developers to put profits before needs of poorer households.	Policy wording to prevent renegotiations of existing permissions	The Planning Practice Guidance has been updated and now makes clear that assessing viability should be undertaken at the plan-making stage, any abnormal costs on sites and policy-based requirements on developers should be reflected in the price paid for the land, and that viability reappraisals would only be appropriate where there is a fundamental change in circumstances from when permission was originally granted.
Lichfields for Taylor Wimpey	Paragraph 10.10–10.13 – Para. 10.10 states that any Viability Assessment submitted with a planning application should be based on and refer back to the viability assessment that informed the Local Plan. As set out in the Draft AHSPD, the Viability Assessment that informed the Local Plan was produced by Keppie Massie in October 2015 (Part One Report), with an addendum published in August 2016 in support of the Publication Version Local Plan (Publication Version). The Part One Report is now over four years old, with the Publication Version over three years old. Taylor Wimpey considers that the Viability Assessment should be regularly updated rather than being relied upon for an overly extended	None to the document but update the Viability Assessment to the Local Plan.	The requirement in national policy is that any viability assessment produced by a developer must look back to the original viability assessment supporting the Local Plan and demonstrate what (if anything) has changed fundamentally. On this basis, the Viability Appraisal in support of the Local Plan is not out-of-date.

Consultee	Key text from representation	Changes sought	Council Response
	period of time. This would ensure that appropriate, up to date typologies can be utilised by developers when formulating a scheme.		
11. Legal Agreements and Undertakings			
Lichfields for Taylor Wimpey	Taylor Wimpey raised a number of concerns regarding Section 106 [S106] legal agreements in their representations to the AHSC. Taylor Wimpey acknowledges that the Council has agreed with all of the points made in these representations, and their concerns have been adequately addressed. Taylor Wimpey supports subsequent amendments to the Draft AHSPD, and welcomes the removal of a requirement to provide a draft S106 legal agreement or completed and signed Unilateral Undertaking with an Affordable Housing Statement.	None in this section	Comment noted
12. Decision-Taking, Implementation and Monitoring			
No comments made in relation to this section			
13. Glossary			
No comments made in relation to this section			
Appendices			
All matters relating to the appendices are addressed above, under the corresponding sections of the main document			