

Milton Keynes Affordable Housing SPD 2018 Representation Summary

| Organisation | Agent | Summary of Representation | MKC Response |
|---------------------------|--------------|--|--|
| Network Rail | Diane Clarke | <ul style="list-style-type: none"> This policy will not impact the railway infrastructure. | Noted – no change. |
| Milton Keynes Green Party | Alan Francis | <ul style="list-style-type: none"> The consultation period should be extended beyond the election period. More affordable housing shall be provided to address homelessness in MK (including hidden rough sleepers). The representation does not state, specifically, how much more affordable housing should be provided. The definition of affordable housing should be genuinely affordable, instead of using the government's definition of 80% market rent. The representation does not indicate, specifically, the desired definition of 'genuine' affordability. The social rent proportion (i.e. referring to 'units at a level broadly equivalent to Social Rent) should be more than 5%. The representation advocates an increase to 10%, based on the argument that there is an existing unmet demand for social rent housing. It suggests that any developments should make a contribution to meet both the demand of existing residents and newcomers. The Council should enforce the proportions of affordable housing in new developments. The Council should challenge viability report from developers trying to avoid completely or decrease the amount of affordable housing. The document should add a section regarding encouraging housing cooperatives and Community Land Trusts. The representation identifies these models as way of building sustainable communities. | <p>The consultation period is compliant with the relevant regulations for preparing SPDs.</p> <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> <p>Proposed change - The definitions of affordable housing will align with the National Planning Policy Framework (2019) definition. Policy HN2 will not be affected by this as the policy wording allows for changes to definitions.</p> <p>The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate and cannot be changed. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK.</p> <p>The process for dealing with non-policy compliant schemes is as set out in Plan:MK and the Government's Planning Practice Guidance (Viability in decision taking - https://www.gov.uk/guidance/viability#viability-and-decision-taking)</p> <p>Proposed change to para 3.5 – The Council shall make explicit that it encourage alternative delivery</p> |

models for affordable housing, including CLT, co-housing and self/custom build

| | | | |
|--------------------------|---|---|---|
| Individuals | <p>Suzanna Raymond</p> <p>Hilarie Bowman</p> <p>Janet Dawe</p> <p>Innes Russell</p> <p>Jackson Whild</p> <p>Jane Whild</p> <p>Sarah Watts</p> <p>Sofia Hassan</p> <p>Yvonne Smith</p> <p>Mubina Chakera</p> <p>Linda Kirk</p> <p>Michael Willis</p> <p>Christine Willis</p> <p>Gill Bradley</p> <p>Collin Bradley</p> <p>Andy Coaton</p> <p>Jean-louis Button</p> | <ul style="list-style-type: none"> • Amendments to Policy HN2 (Pt 1): Units under the Affordable Rent model or Local Housing Allowance (whichever is lower) to be increased by a further 10% (currently 20%) • Amendments to Policy HN2 (Pt 2): 'social rent' (i.e. referring to 'units at a level broadly equivalent to Social Rent) to be added by another 5% (currently 5%) • The document should recognise the need for more diverse variety of housing tenure (including community-led housing models, CLTs, co-op housing, co-living, co-housing) in the tenure mix model. • Land allocation should prioritize for community-led housing groups and self-builds, in support of Policy HN5 | <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> <p>The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate and cannot be changed. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK.</p> <p>Proposed change to para 3.5 – The Council shall make explicit that it encourage alternative delivery models for affordable housing, including CLT, co-housing and self/custom build</p> |
| Elderflowers Projects Co | Carol Barac | <ul style="list-style-type: none"> • Questioned the effectiveness of Affordable Housing policy with relations to potential viability arguments • The document should recognise the need for more diverse variety of housing tenure included for community-led housing (e.g. co-housing, co-operatives, self-designed, self-built and self-managed group housing) | <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> |

- Land allocation should prioritize for community-led housing groups and self-builds, in support of Policy HN5
- A MK Community Land Trust should be established to contribute community-led housing and to ensure that any affordable housing and council built housing could not be sold on
- Community Land Trust should be included as a category to assist affordable housing development
- Milton Keynes Council should be encouraged and allowed to build a sufficient quantity of housing to fulfil their needs (local government delivery)
- Specialist needs of housing should be fully catered for
- The document should mention and advertise on Community Right to Build
- Steps should be taken, if possible, to restrict Right to Buy, which is reducing the amount of affordable housing that has been provided in the past.
- The amount of housing units available for Social Rent should be increased above 5% to at least 10%

The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK.

Proposed change to para 3.5 – The Council shall make explicit that it encourage alternative delivery models for affordable housing, including CLT, co-housing and self/custom build

Xplain Linda Inoki

- The document should make clear that Plan:MK is still under examination and therefore subject to amendment and challenge, particularly with regards to:
 - 1) Policy HN2: allocating just 5% of affordable housing at a level broadly equivalent to Social Rent seems low and might be deemed insufficient
 - 2) Policy HN1's housing density figures are inconsistent with the adopted CMK Neighbourhood Plan
- Para 3.20 Payments in Lieu: Policy reference should ensure and make clear that any payments will be used to provide affordable or social housing.
- Para 3.25, 2nd bullet point: should make reference to 'other relevant policies in the adopted development plan', instead of referring to Plan:MK as the only document.
- Para 3.5: Remove reference that 'larger affordable homes (3+ bedrooms) should be provided in CMK' as the area should not be singled-out for the provision of family housing. Justifications are: (1) CMK better fit smaller households due to the lack of amenities for families (i.e. schools, playgrounds and clinics); (2) 3+ bedroom housing has already been built for 'unofficial and poorly-run' HIMO's, creating neighbourhood problems.

The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK.

Policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a Local Plan that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence. However, the Plan:MK policy recognises that CMK is distinct in its approach to density. As such the decision maker will take both Plan:MK and the CMK Neighbourhood Plan into account for decision making purposes.

Proposed change 3.20 – the SPD shall state explicitly that payments in lieu shall be used to deliver affordable housing.

Proposed change 3.25 – the SPD shall refer to the 'Development Plan (including neighbourhood plans)'

The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market

Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.

| | | | |
|-------------------------|----------------------|--|--|
| <p>CMK Town Council</p> | <p>Thomas Walker</p> | <ul style="list-style-type: none"> The draft SPD is in conflict with the adopted Local Plan (including Neighbourhood Plans) with regards to the types of housing and housing density in CMK It is non-compliant with the 2012 Town and Country Planning (Local Planning) (England) as the emerging Plan:MK has yet to pass examination. The document should make reference to the adopted policies instead. (Ref: Para 1.3/3; Para 1.8./1; Para 2.4; Para 3.1; Appendix B; Para 3.25). In particular, Section 2C of Plan MK is in conflict with the adopted CMK Alliance Business Neighbourhood Plan. Questioned why a stand-alone Affordable Housing SPD is necessary before the adoption of Plan:MK +The document duplicates context in the Planning Obligations SPD and is likely to cause confusion for developers Para 3.5: Objects to the requirement that proposals located within CMK and larger sites should be capable of accommodating families and specialist housing needs'. Justifications are: (1) It is in contrary to the CMK Alliance Business Neighbourhood Plan (para 8.57, Policy CMKAP G10h); (2) the geographical choice of CMK lacks evidence (not a suburban settlement; does not have suitable facilities for families with children, i.e. schools or GP surgeries; 2011 Census shows that households in CMK have very few children relative to other parishes) Para 3.15: Supports the principle of 'pepper potting' and the general rule of 12 dwellings Para 3.15: The 4th sentence recommends that blocks of flats "should be designed in such a way that no more than 12 dwellings will be in one block". This is presumably an error, and needs amending to read "... no more than 12 affordable dwellings will be in one block." Para 3.15: Disagrees that "exceptions could be in areas where the density of development is significantly higher than average, such as in CMK..." (5th sentence). There have been significant issues as a result of pepper potting at the Hub, and lessons learnt should be reflected in the guidance provided in the draft SPD. Para 3.15: If more than 12 affordable dwellings will be in one block, we recommend the "cluster" should have its own core (for access), ref. Dalgin Place Development in Campbell Park. Para 3.21: The first sentence states that "these figures shall remain under review..." We recommend that this sentence is revised in line with the recently adopted Planning Obligations SPD (para 4.6) which states: "All formulas associated with this SPD are current as of the 2016 /2017 financial year. The monetary obligations sought from developers will be index linked in line with inflation and adjusted at the beginning of every financial year on the 5th April using the Consumer Prices Index." Para 3.24: need to be revised to include consultation with Parish and Town Councils Para 3.26: This paragraph erroneously says "planning permission will be granted" subject to the | <p>The SPD provides further guidance to the Plan:MK policies found sound by an independent planning Inspector. The SPD consultation made it clear that the SPD would provide guidance to the emerging Plan:MK and would not be adopted before the Local Plan.</p> <p>Policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a Local Plan that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence. However, the Plan:MK policy recognises that CMK is distinct in its approach to density. As such the decision maker will take both Plan:MK and the CMK Neighbourhood Plan into account for decision making purposes.</p> <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> <p>Family housing can be provided in CMK, which also includes the Campbell Park area, in accordance with Development Plan policies. Family housing is not expected to be limited to low density housing, as family-sized flatted units can be suitable where appropriately designed and in close proximity to services.</p> <p>Agree that 3.15 should refer to 12 affordable dwellings.</p> <p>Requiring a dedicated core for affordable units presupposes they are clustered in such a way to allow this. The SPD seeks to avoid clustering, as per 3.13</p> |
|-------------------------|----------------------|--|--|

completion of s106 agreement... It should say “planning permission, if granted, will be subject to”

Disagree that there needs to be a specific requirement for applicants to consult with Parish/Town Councils prior to submitting an application. **However, wording to encourage will be added as good practice.**

Agree to change 3.21 to refer to CPI indexation from April 2019

| | | | |
|-------------------------|--|--|--|
| O&H Properties | Becky Bonnett (David Lock Associates) | <ul style="list-style-type: none"> • Prematurity of Plan:MK Policy HN2, HN3 and HN10 would undermine the draft SPD. The SPD should not be progressed until the Council receive the Inspectors Report following the examination of the Local Plan. Should the Inspector make any material changes to policies HN2, HN3 or HN10 then a further consultation should be undertaken. • The affordable housing tenures identified in the 'Affordable Housing Target and Tenure Mix' is affordable rent, social rent and shared ownership. This provision does not reflect the emerging revised 2018 (Note: now published 2019) NPPF which provides a broader definition of affordable housing nor the existing diverse mix of affordable housing tenures within Milton Keynes: (1) affordable housing for rent; (2) starter homes (introduced in the Housing and Planning Act 2016); (3) discounted market sales housing; (4) other affordable routes which include shared ownership, equity loans, low cost homes for sale and rent to buy (including intermediate loans). This is supported by the 2016 Autumn Statement and the 2017 Housing White Paper. The SPD should support the expanded definition supported by the above national policy statements, which gives greater flexibility in relation to the provision of affordable housing to ensure the needs of different community groups are met. | <p>The SPD consultation made it clear that the SPD would provide guidance to the emerging Plan:MK and therefore would not be adopted before the Local Plan.</p> <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> <p>Proposed change - The definitions of affordable housing will align with the National Planning Policy Framework (2019) definition.</p> |
| Wavendon Properties Ltd | Tim Waller | <ul style="list-style-type: none"> • Prematurity of Plan:MK Policy HN2, HN3 and HN10 would undermine the draft SPD. The SPD should not be progressed until the Council receive the Inspectors Report following the examination of the Local Plan and the Government's approach to affordable housing policy has been clarified • The affordable housing tenures identified does not reflect the revised 2018 NPPF in relations to: <ul style="list-style-type: none"> ○ To introduce starter homes as a form of affordable housing; ○ To introduce other discounted market sales housing as a form of affordable housing, with a cost set at 20% below local market value; ○ To remove the differentiation between affordable and social rented housing, and to set the cost at 20% below local market rents; ○ To set out other ways of accessing an affordable form of housing, including rent to buy, shared ownership, low cost housing for sale and equity loans. ○ A minimum of 10% of housing on new developments should be affordable homes for ownership (i.e. not rented). | <p>The SPD consultation made it clear that the SPD would provide guidance to the emerging Plan:MK and therefore would not be adopted before the Local Plan.</p> <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> <p>Proposed change - The definitions of affordable housing will align with the National Planning Policy Framework (2019) definition.</p> <p>The suggestion for paragraph 3.11 would be counter to</p> |

- Paragraph 3.11 should be revised to clarify that commercially sensitive information will never be placed in the public domain. Justifications: The release of commercially sensitive information can significantly affect the competitiveness of individual home builders and be commercial damaging, particularly small and medium-sized developers.
- Paragraph 3.18 should be deleted. Paragraph 3.18 appears to imply that the provision of affordable housing should be doubled where it is to be located on an alternative site, and that site would accommodate a level of housing which is individually above the threshold for providing affordable housing. This may simply be a case of the text not having been drafted clearly. However, if the intention is that there should be a doubling of affordable housing provision, which relates to a single development proposal, this would not be justified. We are also mindful that the SPD cannot stray beyond the boundaries of the policy to which it is supplementary guidance; if these policies do not make this type of proposal, then it is beyond the remit of the SPD to do so.

the Planning Practice Guidance advice on viability.

Paragraph 3.18 refers to a situation where the alternative site would provide 11 or more homes, then policy HN2 would apply equally to the development of that site as well as the original site.

| | | | |
|---------------------------|----------------|---|---|
| Grand Union Housing Group | Julie Flinn | <ul style="list-style-type: none"> • Policy HN2: Definition of Affordable Rent is different to the definition of Homes England. Providers can only deliver affordable housing in a Homes England programme where the product meets their audit requirement • Policy HN2: the 50% cap on affordable housing proportion should be removed, to facilitate 100% affordable housing schemes, which could remain to create mixed communities. • There appears to be confusion over rent setting for DMR. The current proposal states that housing costs shall be set at no more than 31% of gross household income, but then introduces a comparison that any rent set should be below the median private sector rents for the applicable dwelling type. If this is intermediate housing, it could align with assessment approach for shared ownership housing. • Supports Policy HN10 • There is inconsistency in the definition of affordable rent in the document and glossary. There are different definitions, under the Affordable Housing definition and then the Affordable Rent definition. • There is no definition of discounted market rent. • New build home buy/shared ownership is the old product name, and is now referred to as Help to Buy shared ownership. • There is a definition of Lifetime Homes in the glossary but we can't seem to locate any reference to Lifetime Homes in the proposed document. • There is no definition of Milton Keynes Build to Rent. | <p>The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK/Parish and Town Councils.</p> <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> <p>Proposed change - The definitions of affordable housing will align with the National Planning Policy Framework (2019) definition.</p> <p>Remove lifetime homes definition from the Glossary</p> <p>Include BtR definition from Plan:MK in the Glossary</p> |
| Historic England | Martin Small | <ul style="list-style-type: none"> • Supports Paragraph 3.9 | Noted – no change. |
| Gladman | Nicole Penfold | <ul style="list-style-type: none"> • SPDs cannot be used as a fast track mechanism to set policies and should not be prepared with the aim of avoiding the need for the examination of policy which should be examined. An SPD is not subject to the same degree of examination and consultation as policies contained in Local Plans and | The SPD consultation made it clear that the SPD would provide guidance to the emerging Plan:MK and therefore |

Core Strategies

- Whilst Plan: MK is at an advanced stage, and has now been submitted for examination, it is not yet adopted therefore it is key that this SPD is updated and reflects any changes made to these policies throughout the examination process.
- The draft SPE should be revised upon the publication of the revised NPPF and seek alignment
- In terms of the mix of affordable housing tenures sought, the SPD needs to be clear that the mix set out in Table 3.1 is just a starting point to guide negotiations as the mix of affordable housing tenures on site may have a huge impact on viability and also there may be different demands in different locations which will affect this. Accordingly, there may need to be a different tenure split dependent upon the location of development and when it is brought forwards.

would not be adopted before the Local Plan.

Proposed change - The definitions of affordable housing will align with the National Planning Policy Framework (2019) definition.

The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.

Milton Keynes
Forum

Tim Skelton

- The issue of affordable housing and land supply should be addressed separately by the Council.
- A Complete review of the matter relevant should be considered, such as the pace of development, the way in which developers are stockpiling land and options, innovative forms of housing supply such as co-ops and self-build groups as well as the role played in supply by public bodies.
- There should be a review/discussion section on what has happened since the publication of the Affordable Housing SPD (adopted 2013) or relevant policy, such as the Council's regeneration programme, and the programme under which affordable housing is to be made available.
- Para 3.30 should indicate that S106 agreements must include details of the programme for release of affordable units. We also believe that full information about the affordable housing – location, tenure type and programme - should be given as part of the initial application so that it can be understood at the time that the application is being considered.
- We are concerned that the Strategic Housing Market Assessment (SHMA) does not seem to recognise the forthcoming changes in Universal Credit, which is to be introduced into MK by the end of the year. We feel that this could have an impact upon the demand for affordable housing.
- There is no apparent monitoring of the actual provision of affordable housing and we suggest the addition of a suitably worded paragraph to ensure that this occurs along with the reporting of other housing statistics. The figures should include the rents/prices that were appropriate at the time that the planning consent is given and the actual figures achieved so that we can be sure that what was promised has actually been delivered. We are concerned that, in the seven years to April 2017, only 9,094 dwellings were completed compared with the target of 12,250 and the forecast of 16,667. If policy H4 in the 2005 Local Plan was for 30% to be “affordable” then the accumulated shortfall, even over this period, is at least somewhere between one and two thousand dwellings.
- We note that 20,603 of the 26,500 extra homes in Plan:MK are already committed. We are unaware of how this affects both this SPD and Policy HN2 in Plan:MK.
- Para 1.4: Line 9: Markey should read Market.
- 2. Para 3.2: We are concerned that, whilst this acknowledges the dynamic relationship between incomes and housing costs, there seems to be an absence either of any discussion of these elements

The Council's monitoring and recent Housing Delivery Test Action Plan addresses some of the matters identified in these representations Re: land supply.

Bullets d and e of paragraph 3.30 refer to the timing of the construction programme, transfer and occupation of affordable housing, so no change is necessary

The Council monitors the delivery of affordable housing within new developments on a quarterly basis as part of its housing monitoring work.

The Government Regulator of Social Housing includes figures for average affordable housing rents in the annual Statistical Data Return (<https://www.gov.uk/government/collections/statistical-data-return-statistical-releases>).

The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK/Parish and Town Councils.

Agree to change para 1.4 to correct the typo

Proposed change – revise SPD to reflect updated

or of actual figures in the SHMA and its numbers appear to rely almost entirely on DWP numbers of Housing Benefit claimants.

- 3. Para 3.9: suggest the following addition to the wording at the end of the opening sentence"..... Valuer will be sought, to include full details (including legal documentation) of the land purchase arrangements". The sentence "In some circumstances....." should be deleted – if the developer wishes to adjust a publicly approved policy which has been subject to full public consultation and scrutiny then it must be with figures that are publicly available.
- 4. Para 3.12: We believe that this should be deleted. Firstly, the word "adverse" is too wide ranging: any requirement for affordable housing will be adverse because it will reduce the amount of money that a developer will otherwise be prepared to pay for the land, so the Council is providing a hostage to fortune. Secondly, the developer will be buying land with a known housing requirement and it is his responsibility, not the Council's, to ensure that there is sufficient flexibility in his land purchase agreement to cover unexpected items. As a general comment, too little consideration has been given in such matters – it is highly unlikely that any requirement for affordable housing will, by itself, produce a negative land value for any site in MK.
- 5. Para 3.20: This need to be fixed firmly by a map or suitable table. For example, is Woolstone "High Value" or "City Estates"?
- 6. Para 3.22: There is an inconsistency with para 3.13 which also refer to design matters (eg the provision of a lift) and we suggest that some tidying up of the wording is required so that all of the design matters are in the same place within the policy. The sentence "For older people's housing applicants should provide adequate access" is meaningless without further wording to explain what adequate access actually means – are not all properties required to have adequate access under the Building Regulations?
- 7. Para 3.30b: The abbreviation RP needs to be explained here, and not in later sections.

National Planning Practice Guidance on viability in plan making and decision taking.

Proposed change alongside 3.20– include values map from Whole Plan Viability Study

Proposed change to para 3.22 – delete final two sentences as matters of access are covered by other policies within Plan:MK

Proposed change to final sentence of para 3.13: "As stated in Policy HN2 higher levels of affordable housing will be supported provided that they contribute to mixed neighbourhoods; community cohesion; and avoid homogenous blocks of either market or affordable housing."

Proposed change – Paragraph 3.30 typo

Hermes CMK
General Partner
Ltd

Sid Hadjoannou
(Turley)

- Welcome that the draft SPD reiterates HN2 in terms of allowing less than the required 31% affordable housing if viability evidence demonstrates that amount cannot be delivered
- Concerned that the requirement to seek an 'open book' approach to viability assessments is ultra vires, which is not required or recommended by the NPPF or PPG.

The Plan:MK affordable housing policies seek to maximise delivery in accordance with national policy but remain flexible to respond to site specific factors.

The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate.

The process for dealing with non-policy compliant schemes is as set out in Plan:MK and the Government's Planning Practice Guidance (Viability in decision taking - <https://www.gov.uk/guidance/viability#viability-and-decision-taking>)

Your MK

David Gleeson

- Seeks clarification regarding payment in lieu thresholds, as of whether it is per unit. It is considered that the payment is very low, if so. I would suggest the following as a starter for ten. These will include construction costs and all associated fees etc. to provide alternative accommodation elsewhere.
- 1 bed - c £140,000

Agree to change 3.21 to refer to CPI indexation from April 2019

| | | | |
|---|-----------------|--|--|
| | | <ul style="list-style-type: none"> • 2 bed - c £180,000 • 3 Bed - c £210,000 | |
| Rentplus UK Ltd | Meghan Rossiter | <ul style="list-style-type: none"> • The SPD should consider the revised changes of the NPPF, particularly in relations to the Glossary, which the Government has widened the range of tenures considered. Paragraphs 2.1, 2.2, 3.1 and others throughout the SPD should be updated to reflect those changes. • Section 2 will also need to be updated to reflect the amendments to the NPPF which include the expectation that major developments will be bought forward with at least 10% as affordable routes to home ownership, and the introduction of 'entry level exception sites' which extends the concept of exception sites to urban areas with an emphasis on meeting first-time buyer and rental needs. As a tenure fully recognised within the draft NPPF, rent to buy forms part of the response to those needs, enabling working households to access housing that is affordable to rent, with support towards home ownership. • Paragraph 3.5 should be amended as below to provide more clarity for applicants: "Table 3.1 sets out the preferred mix of housing to be sought, although these percentages are not rigidly applied across all sites, rather being one of the factors used to inform the mix of housing on a particular scheme. Table 3.1 is based on the best available evidence from 2017, the size and tenure mix should be as indicated by MKC's <u>the most up to date housing needs analysis at the time of application (to reflect the particular site circumstances, and the most recent demographics data, housing evidence and policy).</u> ..." • The full range of evidence available should be used to support rural exception site applications, the requirement set out at paragraph 3.33 for housing needs studies to be produced for all such proposals does not accord with national policy, nor should the SPD be setting a policy requirement for such documentation. This paragraph should be amended to encourage use of such studies, but not a requirement | <p>Proposed change - The definitions of affordable housing will align with the National Planning Policy Framework (2019) definition.</p> <p>Plan:MK allows for newer evidence on housing mix than the SHMA 2017 to be drawn upon to inform the housing mix for each given scheme. This evidence will be prepared by MKC to ensure transparency and robustness. Site circumstances are a material consideration when considering matters of housing mix in any case.</p> |
| Community Housing Action: Milton Keynes | Lawrence Morgan | <ul style="list-style-type: none"> • (In addition to the general individuals email) • The Council should create new communities to be 'Garden Communities' in relation to relevant garden city principles (such as the Essex Design Guide), to respect Milton Keynes's heritage as a New Town. | N/A to Affordable Housing SPD. Policy SD1(Place-Making Principles for Development) sets out the Council's policy framework for new communities (in combination with the site specific allocation policies) |
| Olney Town Council** | Liam Costello | <ul style="list-style-type: none"> • Affordable housing is required and it must be delivered to that end this document needs to be robust. Every development is unique and affords developers the opportunity to apply for exceptional circumstances which will be subjective judgement to particular sites and market conditions. In particular, Item1.4 We would suggest the deletion of the following sentence as it introduces too much wriggle room for developers. "it accepts that a pragmatic stance needs to be taken to ensure that delivery of affordable housing as part of a wider residential development is viable and achievable" The factors that may give rise to proposals to reduce the amount of affordable housing are not well defined in the policy. Any such proposals need to be objectively justified based upon criteria set out in | <p>Proposed change – paragraph 1.5 to be amended to reflect the Planning Practice Guidance on viability and the limited circumstances when viability testing at the development application stage would be permitted.</p> <p>Proposed change – the SPD shall refer to the 'Development Plan (including neighbourhood plans)'</p> |

the SPD.

- Section 2 and 3 lacks reference to Neighbourhood Plans, and would need to reflect the NPPF
- Town and Paris councils should be involved in the discussion (item 3.24)
- Item3.2 delete the part sentence following the word 'dynamic' it is opinion and irrelevant.
- The glossary should include definitions of, 'social rent, SHMA, PPG, flatted developments and build developments'.
- There should be a robust mechanism for ensuring that cumulative small-scale developments, that in isolation are under the threshold of this policy but would cumulatively be over the threshold, are required to make contributions to affordable housing.
- Item3.8 This undermines the objective set out in in item 3.6
- Item3.32 opens up a 'Free for All' on developments outside of existing boundaries and should be restricted to small scale developments. This should not apply to areas that have adopted Neighbourhood Plans that have allocated sites for housing.
- There seems to be a bit of a conflict between the affordable housing policies in our Neighbourhood Plan and this SPD. Our Neighbourhood Plan has a Local Connections Policy, which is the equivalent of the SPD's Rural Exception Sites policy. The difference is that the MKC policy refers to small sites only, ours applies to the main site allocations of 300Dwellings. Could you advice of how this difference will be interpreted and how we can ensure that our policy is recognised. Perhaps the MKC policy should make reference to any policies contained within adopted Neighbourhood Plans.

Disagree that there needs to be a specific requirement for applicants to consult or discuss with Parish/Town Councils prior to submitting an application. **However, wording to encourage will be added as good practice.**

Paragraph 3.2 provides context to the wider influences on affordability as way of introduction to affordable housing need, and reflecting that evidence on affordable housing need including housing mix will need to be kept up to date

The National Planning Policy Framework (paragraph 63) stipulates that affordable housing can only be required on major development or schemes of 5 units or more (in rural areas)

Paragraph 3.32 is consistent with Policy HN10.

Policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a Local Plan that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence. However, Plan:MK does not include a local connection policy. As such the decision maker will take both Plan:MK and the Neighbourhood Plan into account for decision making purposes.

Stony Stratford Ward Michael Moutrie

- The SHMA or SPD should include figures on the average rent for social housing and private sector in Milton Keynes.
- The draft SPD lacks a working model of actual affordability. The Objectively Assessed Need for 8,200 extra "affordable" dwellings is likely therefore to be an underestimate. It is equivalent to approximately 30% of the 26,500 homes proposed by Plan:MK which seems a fortuitous coincidence.
- Sections 3.9 to 3.12 of the draft SPD acknowledge the ability of developers to challenge the requirement for "affordable" housing if it impacts on the viability of a development. This should be a more transparent process and it would be helpful to have a robust framework within which to assess and properly consider any such future challenges; and it would be helpful to know what has happened previously in Milton Keynes.
- The SHMA or SPD should discuss recent delivery numbers of affordable housing in Milton Keynes, to

The Government Regulator of Social Housing includes figures for average affordable housing rents in the annual Statistical Data Return (<https://www.gov.uk/government/collections/statistical-data-return-statistical-releases>).

The Council monitors the delivery of affordable housing on a quarterly basis as part of its housing monitoring work

The requirements set out in Plan:MK have been subject to independent viability testing and examination by the

| | | | |
|--------------------------------------|----------------|---|--|
| | | <p>monitor the relationship between supply and demand in the future and to evaluate the policy's success/understand lessons to learn.</p> <ul style="list-style-type: none"> Require that the process for challenging the viability of any sites is open and transparent and that site viability assessments are published. Differentiate between compliant and non-compliant schemes and try to disincentivise non-compliance through greater review, clawback, overage. | <p>Planning Inspectorate. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK.</p> <p>The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.</p> <p>The process for dealing with non-policy compliant schemes is as set out in Plan:MK and the Government's Planning Practice Guidance (Viability in decision taking - https://www.gov.uk/guidance/viability#viability-and-decision-taking)</p> |
| Natural England | Sharon Jenkins | <ul style="list-style-type: none"> 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. | Noted – no change. |
| Individuals | Barry Steadman | <ul style="list-style-type: none"> I do not have the capacity to give this matter my full attention, however having previously responded to MKC's consultations upon Plan MK, SAP/UCS/SHLLA sites and the Campbell Park Draft Neighbourhood Plan which are now in MKC's possession and include reference to this subject I refer you to those as also being my response to this particular consultation as well. | Noted – no change. |
| Shenley Brook End & Tattenhoe PC | Sharon Kerr | <ul style="list-style-type: none"> Page 18 - Policy HN1, ssC3: it is not acceptable to encourage developers to build homes without adequate parking spaces and offering public transport as an alternative, due to existing poor parking conditions in MK and the uncertainty of public transports schedule | The requirements set out in Plan:MK have been subject to independent viability testing and examination by the Planning Inspectorate. The delivery of social housing will not rely entirely on private housebuilders. The Council shall seek opportunities to deliver social housing via partnership working with MKDP/Your MK/Parish and Town Councils. |
| Wolverton and Greenleys Town Council | | <ul style="list-style-type: none"> Policy HN2: WGTC concern is with the number of developers who could argue that they cannot deliver the 31% figure of affordable housing for a variety of financial reasons. We wish to see that this is the offer of lower % of affordable housing should not be justified simply by the property developers profit margin Particularly supports policy HN3 | The process for dealing with non-policy compliant schemes is set out in Plan:MK and the Government's Planning Practice Guidance (Viability in decision taking - https://www.gov.uk/guidance/viability#viability-and-decision-taking) |

| | | | |
|-------------------------|-------------------|---|--|
| | | | Noted – no change. |
| The Canal & River Trust | Jane Hennell | <ul style="list-style-type: none"> No comments | Noted – no change. |
| Individuals | J Wallis | <ul style="list-style-type: none"> Paragraph 1.9c needs to reflect the importance of existing community cohesion | Noted – no change. Policies HN1 and HN2 of Plan:MK enable consideration to be taken of the existing demographic and housing stock within the area as material considerations. |
| Individuals | S Jones | <ul style="list-style-type: none"> Need to include a comparison table of the housing mix achieved for the period 2000-2016 | Noted – no change. The housing mix within the SHMA is based on demographic projections over the plan period. It therefore is the starting position when discussing housing mix on any given site, along with other material considerations that have a bearing on housing mix, such as site location and context. |
| Individual | Rev Matt Trendall | <ul style="list-style-type: none"> Increase the ratio of social rent within the affordable housing tenure split, as per the Strategic Housing Market Assessment There is a chronic shortage of 3 and 4 bedroom social rent dwelling. The proposed housing mix should have a higher number of 2 and 4 bedroom social rent dwellings. | <p>The tenure split now set within Policy HN2 is based on both the Strategic Housing Market Assessment and the Whole Plan Viability Study. Taken together, the Council has only been able to justify the proposed tenure split within Policy HN2, which has now been examined and found to be sound.</p> <p>The housing mix within the SHMA is based on demographic projections over the plan period. It therefore is the starting position when discussing housing mix on any given site, along with other material considerations that have a bearing on housing mix, such as site location and context.</p> |
| Individual | J Eley | <ul style="list-style-type: none"> Document gives too many opportunities to developers and planning officers to set aside the provision or reduce the provision or simply pay MKC additional monies. Every project is unique, and the factors that may reduce the amount of affordable housing are not well defined and affords developers the opportunity to apply for exceptional circumstances which will be opinion based variable to site and market conditions. How is any balance, local knowledge or objectivity built into this process, when, Developers want profits and Planning Officers have no motivation and apparent limited ability to object faced with delivering Central Government's NPPF. | <p>Proposed change – revise SPD to reflect updated National Planning Practice Guidance on viability in plan making and decision taking</p> <p>Glossary updated to include revised definition of Affordable Housing within the NPPF 2019</p> <p>Document will be revised to remove reference to</p> |

- Item1.4 delete the sentence “it accepts that a pragmatic stance needs to be taken to ensure that delivery of affordable housing as part of a wider residential development is viable and achievable”
- Typo: should read Market Assessment (9th line)
- Wording needs to be introduced to avoid multiple adjoining sites of less than 11 houses being built within a fixed time frame say circa 7 years
- Item2.4 reference to “Social Rent” needs to be defined or linked to the Glossary.
- Item2.11 figure should read 31% see page 6.
- Item3.2 delete the part sentence following the word ‘dynamic’ it is opinion and irrelevant.
- Item3.3 Acronym used SHMA but not defined until 3.4 page 8
- Item3.6 Acronym PPG used but NOT defined page 9
- Item3.8 delete a repeat and immediately undermines the requirement in item 3.6
- Item3.11 Typo? The last but one sentence should refer to landowners not developers. The developers do not set the purchase price of the land! Do they?
- Item3.12 Repeat of previous info
- Item3.14 ‘Flatted’ not a recognisable term should it be ‘development of flats’
- Item3.19 Repeats previous info delete all except ‘In exceptional circumstances, it may be appropriate for the council to accept financial contributions in lieu of the provision of affordable units’
- Item3.24 The parties have limited local knowledge in cases of rural sites. Where and How is the Parish Council consulted and by what involvement mechanism?
- Item3.30 c. use of acronym RP not defined until 3.30!
- Item3.32 opens up a ‘Free for All’ on developments outside of existing boundaries!
- Item3.34 additional wording required add ‘as local affordable housing in perpetuity’ Not just local in perpetuity.
- Policy HN 2. C. ‘Build to Rent’ providers a definition would be helpful
- Olney’s Neighbourhood Plan was prepared before this policy became live. We have set a maximum boundary for our community. This SP document makes no provision for this option to be honoured.
- The ‘right to buy issue’ needs to be settled before this document can be adopted as a policy.

30% within paragraph 2.11

SPD revised in section 2 to refer to ‘Planning Practice Guidance’ in full

The terms Registered Provider will be given in full, and is defined in the Glossary

Sentence with paragraph 1.4 is a reasonable statement based upon national planning policy and guidance

Noted typo within paragraph 1.4

Policy HN2 and Plan:MK includes provisions to prevent developers bringing forward piecemeal proposals to avoid crossing the threshold for provision of affordable homes.

Commentary within 3.2 is reasonable and is discussed within the Council’s Strategic Housing Market Assessment which has informed the Council’s calculation of affordable housing need.

Full name of the acronym SHMA is provided within section 1 of the SPD.

Statement at paragraph 3.8 reflects the need for applicants and decision makers to take account of wider planning obligations for schemes.

The information referred to in paragraph 3.11 would be that of developers (or applicants) rather than landowners.

‘Flatted’ is a recognised term used in planning parlance which applicants and decision makers are familiar with.

The section on ‘Rural Housing Needs’ outlines the approach to rural exception sites.

The statement at paragraph 3.32 reflect national planning policy.

Paragraph 3.34 adequately conveys that the housing should be maintain in perpetuity as local affordable housing.

Build to Rent is defined in Plan:MK. This has been added to the Glossary of the SPD.

The Olney NP remains part of the statutory Development Plan. Where there is a conflict between Plan:MK and the Olney NP, Plan:MK policy will take precedence being the most recently adopted Development Plan Document.

| | | | |
|-------------------------------|-----------|--|--|
| Individual | D Tavener | <ul style="list-style-type: none"> it is not clear how elderly are to be catered for. need to incorporate affordable (can afford on a state pension) housing for elderly | <p>Policy HN2 of Plan:MK requires affordable housing to be provided across all proposals for C3 dwellings which includes housing for older person. (e.g. Extra Care developments)</p> |
| Redrow Homes (South Midlands) | A Kirkham | <ul style="list-style-type: none"> There should be a short delay in the adoption of the SPD so that it can reflect the amended definitions in the new NPPF once that is finalised. Changes to the tenure split requirements to delete reference to Social Rent and ensure at least 10% of homes would be for affordable home ownership (and any additional updates required following the Plan:MK Examination process). Introduce a sliding scale of appropriate cluster sizes based on the size of the site, to enable a suitable design response dependent on the scale of the development. | <p>The SPD will be revised to include guidance on how decision makers should interpret differences between Plan:MK and the NPPF 2019 with regard to the 10% affordable home ownership requirement as well as changes in thresholds.</p> <p>The SPD will be revised to allow for a degree of appropriate clustering within larger scale schemes.</p> <p>The SPD consultation made it clear that the SPD would provide guidance to the emerging Plan:MK and therefore would not be adopted before the Local Plan. Plan:MK has been examined under the NPPF 2012, however, its policies on affordable housing allow for changes in definitions to 'affordable housing' to be accommodated without rendering the policy and SPD out of date.</p> |

The Plan:MK housing target and affordable housing policies are informed by the Strategic Housing Market Assessment, which have been prepared and examined in line with the NPPF 2012. They seek to maximise the delivery of affordable housing in accordance with national policy but remain flexible to respond to site specific factors.

Waller Planning T Waller

- The SPD should be suspended until both Plan:MK has been adopted, and the Government's approach to affordable housing policy and provision has been clarified.
- Paragraph 3.11 should be revised to make it clear that commercially sensitive information will never be placed in the public domain. Paragraph 3.18 should be deleted.

The SPD consultation made it clear that the SPD would provide guidance to the emerging Plan:MK and therefore would not be adopted before the Local Plan.

Paragraph 3.11 strikes a reasonable balance between the need for transparency and to be sensitive to commercial information.

Paragraph 3.18 provides guidance on a reasonable approach to the provision of affordable housing where this is not possible on the initial application site.

Abbeygate Developments Ltd

- Action to review the viability of the proposals for their application in Central Milton Keynes is required before the policy is adopted.
- Provisions to calculate commuted sums on a site by site basis for schemes in Central Milton Keynes should be included.
- The statement from the Council's Revised Planning Obligations SPD that the standard affordable housing threshold cannot be applied to Build to Rent schemes should be included.
- The statement from the Council's Revised Planning Obligations SPD that the affordable housing provision can be provided in the case of Build to Rent schemes by Discounted Market Rent units should be included.

The overall target and tenure split set within Policy HN2 is based on both the Strategic Housing Market Assessment and the Whole Plan Viability Study. The Whole Plan Viability Study includes typologies for CMK which account for higher development costs associated with higher density schemes.

The SPD sets a general approach to commuted sums for the borough as whole in line with the Council's wider approach to moving away from CMK specific planning obligations.

The approach to Build to Rent within Policy HN2 has been examined. Modifications to the policy result in the 31% target being applied to Build to Rent, with

Discounted Market Rent set at levels equivalent to Affordable Rent or LHA rates. The policy includes a viability valve where applicants can demonstrate this would not be viable, in line with the revised Planning Practice Guidance on viability
