



# Affordable Housing Supplementary Planning Document (SPD)



**Consultation Statement | July 2023**

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## 1.0 Introduction

### Purpose of the statement

- 1.1 It is important that the council engage with the community throughout the preparation of the Local Plan and other planning policy documents. In doing this we need to ensure, we follow the council's Statement of Community Involvement (SCI)<sup>1</sup> and Regulations, governing the production of supplementary planning documents (SPDs).<sup>2</sup>
- 1.2 In this case, we were consulting on our Draft Affordable Housing Supplementary Planning Document (SPD). We have undertaken two consultations on the document. Due to the nation being in lockdown due to the Covid-19 pandemic, the first of these was for a period of ten and a half weeks and took place between 6 March and 18 May 2020. The second, which was for six weeks, took place between 9 January and 20 February 2023. The reasons for undertaking two periods of consultation were as follows:
- During the first consultation, a number of comments were received about how the district council were proposing to calculate the commuted sum for contributions towards off-site affordable housing. As such, the council felt that it was appropriate to undertake further work to look at the alternative options for doing this; and
  - The first consultation took place during the Covid pandemic and, in the period that followed, the Government's approach to affordable housing changed through the introduction of First Homes<sup>3</sup>. As a result, it was considered good practice to update the draft SPD to incorporate the Council's position on First Homes in relation to the requirements of paragraph 65 of the National Planning Policy Framework.
- 1.3 To inform the content of the updated draft SPD, an addendum to the 'Housing Needs of Particular Groups Study' (2018) was undertaken to inform the need for First Homes. This was supported by updated viability testing. Copies of these documents can be viewed at: <https://mansfield-consult.objective.co.uk/kse/event/37241>
- 1.4 Due to the subsequent changes that were made to the SPD, it was considered appropriate to undertake a further period of consultation to give

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<sup>1</sup> <https://www.mansfield.gov.uk/downloads/file/3021/adopted-sci-january-2022>

<sup>2</sup> <https://www.legislation.gov.uk/ukxi/2012/767/part/5/made>

<sup>3</sup> <https://www.gov.uk/guidance/first-homes>

anyone with an interest in affordable housing the chance to make comments on the amended document. This included residents, businesses, developers and statutory consultees.

- 1.5 In response to some comments made during the second consultation, additional viability work was undertaken in April / May 2023. This was to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. A copy of this can be viewed at [www.mansfield.gov.uk/spd](http://www.mansfield.gov.uk/spd).
- 1.6 This statement explains how we consulted and how we have taken the views of consultees into consideration during the preparation of the SPD.
- 1.7 Annex 2 of the National Planning Policy Framework (NPPF)<sup>4</sup> states that supplementary planning documents (SPDs) are documents that add further detail to the policies of the development plan. They are a material consideration when determining planning applications but do not form part of the statutory development plan.
- 1.8 The district council is committed to delivering sustainable communities that are safe, healthy and inclusive. To help achieve this, the district council expects new development to provide or contribute directly towards the provision of necessary infrastructure to mitigate their impact, including affordable housing.
- 1.9 The key objective of the Affordable Housing Supplementary Planning Document (SPD) is to expand on the district council's approach to affordable housing, which is set out in policy H4 of the Adopted Mansfield District Local Plan 2013 – 2033<sup>5</sup>. It provides detailed information about the cases when physical or financial affordable housing contributions may be required including a formula for how the latter will be calculated. An example calculation is also provided.

### Structure of this Statement

- 1.10 The structure of this statement is as follows:
  - **Section 2** gives details on who was consulted including the list of specific and general consultation bodies,
  - **Section 3** sets out how the consultations were undertaken,
  - **Section 4** outlines who responded including the chosen response methods,

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<sup>4</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>5</sup> <https://www.mansfield.gov.uk/local-plan/adopted-local-plan-2013-2033>

- **Section 5** provides a summary of the main issues raised and our response,
- **Section 6** provides a conclusion to the consultations,
- **Appendix A** provides examples of the various consultation material including letters / emails and press release, relating to the first consultation.
- **Appendix B** provides examples of the various consultation material including letters / emails, press release, and social media posts promoting the consultation relating to the second consultation.

1.11 As two periods of consultation were undertaken, some sections are subdivided, with information about the initial consultation given first followed by information relating to the second consultation.

## 2.0 Who was consulted?

### 6 March – 18 May 2020 Consultation

- 2.1 We sent notifications, either electronically or by post, to 2,783 individuals and organisations registered on the local plan database including the specific and general consultation bodies that are set out in tables 1 and 2 below. This explained the purpose of the consultation event and invited representations on the draft SPD. It should be noted that it was originally intended that the consultation would run from 6 March – 20 April 2020 and this is what was set out in the consultation letters (see examples on page 125, appendix A). Because of the Covid-19 pandemic, this was extended to 18 May 2020. All those who has been originally notified of the consultation were informed of this change and the website was also updated.

**Table 1 - Specific consultation bodies:**

Arqiva	Mansfield and Ashfield Strategic Partnership
Ashfield District Council	Mobile UK
Bassetlaw District Council	N Power
Bolsover District Council	National Grid Property
BT Plc	Natural England
Chesterfield Borough Council	Network Rail
Clipstone Parish Council	Newark & Sherwood District Council
Coal Authority	NHS Property Services
Cuckney Parish Council	North East Derbyshire District Council
Defence Infrastructure Organisation	Nottingham and Nottinghamshire Clinical Commissioning Group
Department for Transport	Nottingham City Council
Derbyshire County Council	Nottinghamshire County Council
E.ON Central Networks	Nottinghamshire Healthcare NHS Foundation Trust
E.ON Energy Ltd	Nottinghamshire Fire & Rescue Service
East Midlands Councils	Nottinghamshire Police
East Midlands Trains	O2 UK Ltd
Edwinstowe Parish Council	Perlethorpe-cum-Budby Parish Meeting
Environment Agency - Lower Trent Area	Rainworth Parish Council
Gedling Borough Council	Rufford Parish Council



Health & Safety Executive	Severn Trent Water Ltd
Highways England	Severn Trent Water Ltd. (Mansfield)
Historic England	Sherwood Forest Hospitals NHS Trust
Homes and Communities Agency	Shirebrook Town Council
Home Builders Federation	Vodafone Ltd
Hutchison 3G UK Ltd	Warsop Parish Council
Kings Clipstone Parish Council	

**Table 2 - General consultation bodies:**

Albert Street Residents Association	Mansfield 2020 Ltd
Ancient Monuments Society	Mansfield Business Improvement District (BID)
APTCCO	National Gypsy Traveller Federation
Ashfield Links Forum	National Federation of Gypsy Liaison Groups
British Horse Society	National Farmers Union
Citizens Advice Bureau	Nottinghamshire MIND
Country Land and Business Association Ltd	Nottinghamshire Biological and Geological Records Centre
Disability Nottinghamshire	Nottinghamshire Wildlife Trust
Derbyshire and Nottinghamshire Chamber of Commerce	Planning Inspectorate
Derbyshire and Nottinghamshire Local Enterprise Partnership	Royal Society for the Blind (Nottinghamshire)
Derbyshire County Council	Society for the Protection of Ancient Buildings
Derbyshire Gypsy Liaison Group	Sport England
Forest Town Community Council Planning Sub Committee	Stagecoach East Midlands
fft Friends Families and Travellers	Sure Start Meden Valley
Groundwork Creswell, Ashfield & Mansfield	Sure Start Ravensdale
Health & Safety Executive	The Woodland Trust

9 January – 20 February 2023

2.2 We sent notifications, either electronically or by post, to 1,722 individuals and organisations registered on the local plan database including the specific and general consultation bodies that are set out in tables 3 and 4 below. This explained the purpose of the consultation event and invited representations on the draft SPD. We also highlighted the upcoming consultation to members of the Mansfield Developers’ Forum at a meeting that was held on 9 December 2022. The number of notifications sent out compared to the original consultation in 2020 is different because, following the adoption of the Mansfield Local Plan, we took the opportunity to refresh our consultation database, and to cut paper usage and postage costs. Anyone without an email address registered with us was written to and asked them to contact us if they would like to remain on our records.

**Table 3 - Specific consultation bodies:**

Arqiva	Mobile UK
Ashfield District Council	N Power
Bassetlaw District Council	National Grid
Bolsover District Council	Natural England
BT Group Plc	Network Rail
Chesterfield Borough Council	Newark & Sherwood District Council
Clipstone Parish Council	NHS Nottingham and Nottinghamshire
Coal Authority	NHS Property Services
Defence Infrastructure Organisation	North East Derbyshire District Council
Department for Transport	Norton and Cuckney Parish Council
Derbyshire County Council	Nottingham City Council
E.ON Central Networks	Nottinghamshire County Council
E.ON Energy Ltd	Nottinghamshire Fire & Rescue Service
East Midlands Councils	Nottinghamshire Police and Crime Commissioner
East Midlands Railway	Perlethorpe-cum-Budby Parish Meeting
Edwinstowe Parish Council	Rainworth Parish Council
Environment Agency - Lower Trent Area	Rufford Parish Council
Gedling Borough Council	Severn Trent Water Ltd
Health & Safety Executive	Severn Trent Water Ltd. (Mansfield)
Highways England	Sherwood Forest Hospitals NHS Trust
Historic England	Shirebrook Town Council
Homes England	Telefonica O2 UK Ltd

Home Builders Federation	Virgin Media
Hutchison 3G UK Ltd	Vodafone Ltd
Mansfield and Ashfield Strategic Partnership	Warsop Parish Council

**Table 4 - General consultation bodies:**

Age Concern Nottinghamshire	Groundwork Creswell, Ashfield & Mansfield
Age UK Nottinghamshire	National Farmers Union
Albert Street Residents Association	Health & Safety Executive
Ancient Monuments Society	Mansfield 2020 Ltd
APTCOO	Mansfield Community and Voluntary Service
Ashfield Links Forum	Nottinghamshire Biological and Geological Records Centre
British Horse Society	Nottinghamshire Wildlife Trust
Citizens Advice Bureau	Planning Inspectorate
Country Land and Business Association Ltd	Royal Society for the Blind (Nottinghamshire)
Derbyshire and Nottinghamshire Chamber of Commerce	Society for the Protection of Ancient Buildings
Derbyshire and Nottinghamshire Local Enterprise Partnership	Sport England
Derbyshire County Council	Stagecoach East Midlands
Derbyshire Gypsy Liaison Group	Sure Start Meden Valley
Disability Nottinghamshire	Sure Start Ravensdale
Forest Town Community Council Planning Sub-Committee	Woodland Trust
Forest Town Nature Conservation Group	

### **3.0 How was the consultation undertaken?**

3.1 A number of consultation methods were used in the preparation of the Planning Obligations SPD to invite people's views and to comment on its content. The list below sets out the details of the methods of engagement used.

#### **Pre-consultation engagement**

3.2 In developing the 2020 and 2022 drafts of the Affordable Housing SPD, there were internal consultations carried out with other departments / teams at the district council namely Development Management and Housing. This included discussions about tenure split as set out in table 1 of the draft SPD, the approach to calculating the commuted sum and the approach to First Homes (2022 draft only).

#### **Statutory requirements**

3.3 There is a statutory requirement to consult on the content of a SPD<sup>6</sup>. To meet the requirements of the regulations the following was undertaken:

#### **Consult with specific and general consultation bodies**

3.4 With both versions of the Draft Affordable Housing SPD, consultation was undertaken with the specific and general consultation bodies recorded in the local plan database (see tables 1 – 4 above). All organisations were sent a letter either electronically or by post. This included details about the consultation, how to submit comments on the draft SPD, the timescales for making comments and to whom they should be submitted. There was also a link to the relevant webpage where the draft SPD and online questionnaire could be viewed. For both consultations, the council webpage address was <https://www.mansfield.gov.uk/planningconsultations>. Comments could be made through the district council's consultation portal <http://mansfield.objective.co.uk/portal>. At the time of the second consultation, the consultation portal address was <https://mansfield-consult.objective.co.uk/kse>

3.5 The letters were also emailed / posted to all members of the public on the database, and can be viewed on page 125 (appendix A, 2020 consultation) and pages 127 and 128 (appendix B, 2023 consultation). As set out in

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<https://www.legislation.gov.uk/ukxi/2012/767/part/5/made?msclid=3beb0c7dc15e11ec95d262c038d1775e>

paragraph 2.1, a total of 2,783 people and organisations were contacted using these methods as part of the first consultation and 1,722 in the second consultation.

### **Making copies of documentation available for inspection**

#### 6 March – 18 May 2020 Consultation

3.6 Copies of the Draft Affordable Housing SPD, paper questionnaires, and consultation statement setting out how people / organisations could comment on the SPD (including timescales for doing so) were made available to view at the following venues:

- Mansfield District Council - Civic Centre, Chesterfield Road South
- Clipstone Village Library - First Avenue
- Forest Town Library - Clipstone Road West
- Ladybrook Library - Ladybrook Place
- Mansfield Library - West Gate
- Mansfield Woodhouse Library - Church Street
- Rainworth Library - Warsop Lane
- Market Warsop Library - High Street

3.7 On the 20 March 2020, all libraries within Nottinghamshire closed due to the Covid-19 pandemic and did not reopen until 6 July. Therefore, copies of the draft SPD could only be viewed in libraries up to 19 March. Due to other restrictions during the Covid-19 lockdown, the only place that the draft SPD could be viewed was on the district council's website <https://www.mansfield.gov.uk/planningconsultations>

#### 9 January – 20 February 2023 Consultation

3.8 Copies of the Draft Affordable Housing SPD, paper questionnaires, consultation statement setting out how people / organisations could comment on the SPD (including timescales for doing so) along with a poster (see page 129, Appendix B) raising awareness of the consultation were made available to view at the following venues:

- Mansfield District Council - Civic Centre, Chesterfield Road South
- Clipstone Village Library - First Avenue
- Forest Town Library - Clipstone Road West
- Ladybrook Library - Ladybrook Place
- Mansfield Library - West Gate
- Mansfield Woodhouse Library - Church Street

- Rainworth Library - Warsop Lane
- Market Warsop Library - High Street
- Warsop Town Hall - Church Street

3.9 Due to Rainworth library being closed from 22 December 2022 - 31 January 2023<sup>7</sup>, copies of the various documents were only available to view at this library from 31 January – 20 February 2023.

### **Website**

3.10 As part of both consultation periods, information about the consultation, including links to a PDF copy of the draft SPD and a link to the Local Plan consultation portal was available to view and download from the council's website using the links referred to in paragraph 3.4 above. The document was available on the Local Plan consultation portal to allow people to comment online. Screenshots of the webpage for the second consultation can be viewed in Appendix B (page 130).

3.11 In addition, the following documents / evidence that helped inform the content of the second consultation version of the Affordable Housing SPD were available to view on the district council's website from 18 January – 20 February:

- First Homes and the impact on Local Plan viability, April 2022 – Produced by CP Viability Ltd
- Housing Affordability In the Context of First Homes, February 2022 – Produced by J G Consulting
- Affordable Housing Supplementary Planning Document (SPD) – Response to consultation comments, November 2020 - Produced by CP Viability Ltd

### **Press Release**

#### 6 March – 18 May 2020 Consultation

3.12 A press release regarding the Draft Affordable Housing SPD was published on 9 March 2020. This provided a link to the council's consultation portal where the various documents could be viewed. A copy of this can be seen on page 126 (Appendix A). An article was also posted on the council's website <https://www.mansfield.gov.uk/news/article/127/have-your-say-on-affordable-housing>. This provided information about the consultation, including where the various documents could be viewed.

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<sup>7</sup> <https://www.inspireculture.org.uk/reading-information/find-a-library/rainworth-library/>

9 January – 20 February 2023 Consultation

3.13 A joint press release regarding the Draft Affordable Housing SPD and Draft Biodiversity Net Gain SPD was issued by the district council on 9 January 2023. This gave details of the consultation period and where copies of the document were available to view. A copy of the press release is included in Appendix B (page 131).

The press release generated three articles:

- Planning Portal News for the 26 January. This included a link to the council’s website to allow readers to view the document. A copy of this article can be viewed at <https://www.planningportal.co.uk/services/weekly-planning-news/planning-news-26-january-2023>
- The Planner – 18 January, as above this included a link to the council’s website. A copy of this article can be viewed at <https://www.theplanner.co.uk/2023/01/18/mansfield-consulting-two-spds>
- As part of The Planner News on 20 January <https://www.theplanner.co.uk/2023/01/20/england-round-bidding-brownfield-land-funding-open-mansfield-consulting-two-spds>, there was a note about the consultation with a link to article referred to in the second bullet point above.

**Social Media**

3.14 As part of the second consultation between 9 January and 20 February 2023, various elements of the council’s corporate social media were used to raise awareness of the consultation on the draft SPD. This took place twice a week commencing on the 2 January. The council currently has 19,057 followers on Facebook, 7,067 followers on Twitter, 488 followers on Instagram and 2,318 on LinkedIn. Further information about the level of reach and number of engagements for the social media is set out below whilst examples of the various posts are set out in appendix B (pages 133 and 134).

Facebook Statistics – average per post

Reach	1,478
Engagements (inc. shares, reactions, comments)	567

Instagram Statistics – average per post

Reach	587
Engagements (inc. likes, comments, shares)	3

Twitter Statistics – average per post

Impressions	354
Engagement	15

LinkedIn Statistics – average per post

Organic Impressions	312
Engagement	5

**Other Engagement**

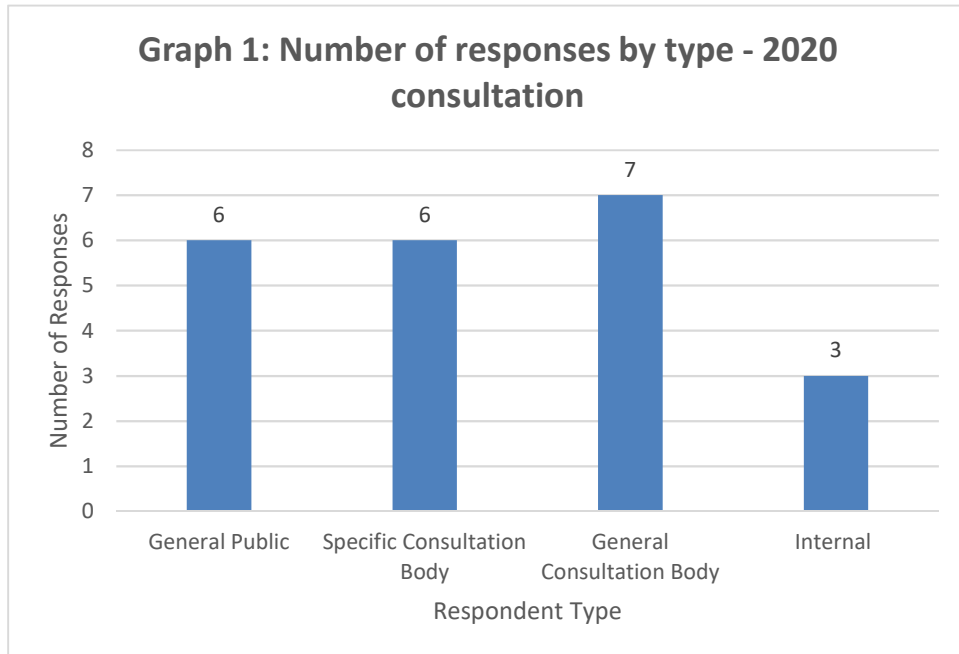
- 3.15 In addition to the engagement mentioned above, information about the consultation was included in the February edition of the council's residential e-newsletter that is sent to approximately 1,600 people per month. This had an open rate of 53.6% and a click rate of 9.8%. A copy of the information is contained in appendix B (page 134).
- 3.16 To help raise awareness of the consultation within the district council, information was included as part of the regular email updates that are circulated to staff. This was undertaken using the following (once for each method during February):
- All staff emails – An example of the email can be found in appendix B (page 135)
  - Intranet
  - Facebook – TeamTalk that has 403 staff members signed up to it
  - Website – A link was provided to an article about the consultation at <https://www.mansfield.gov.uk/news/article/11612/have-your-say-on-documents-to-increase-biodiversity-and-affordable-housing-in-mansfield>
- 3.17 An example of the staff e-mail and TeamTalk post can be seen in appendix B (page 135).



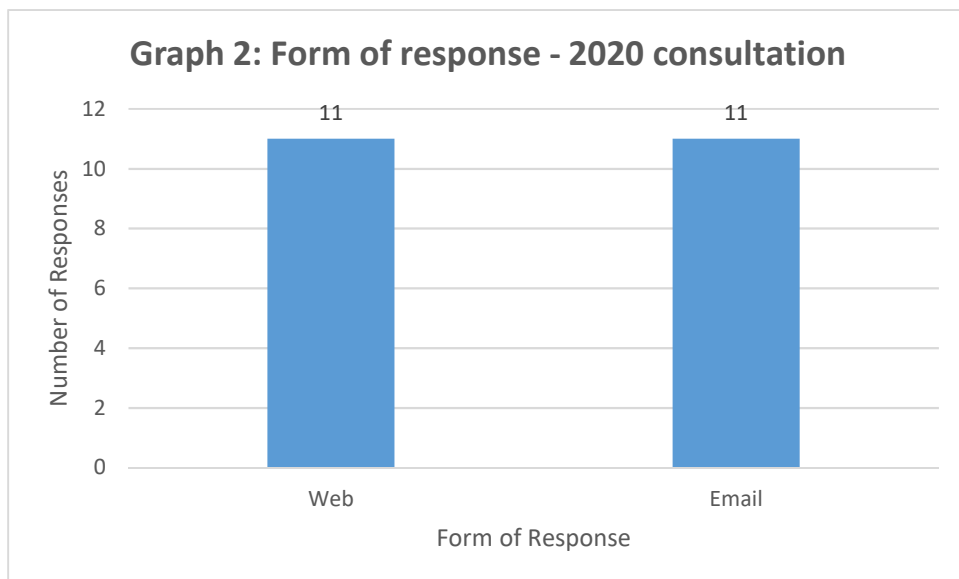
## 4.0 Who responded?

### 6 March – 18 May 2020 Consultation

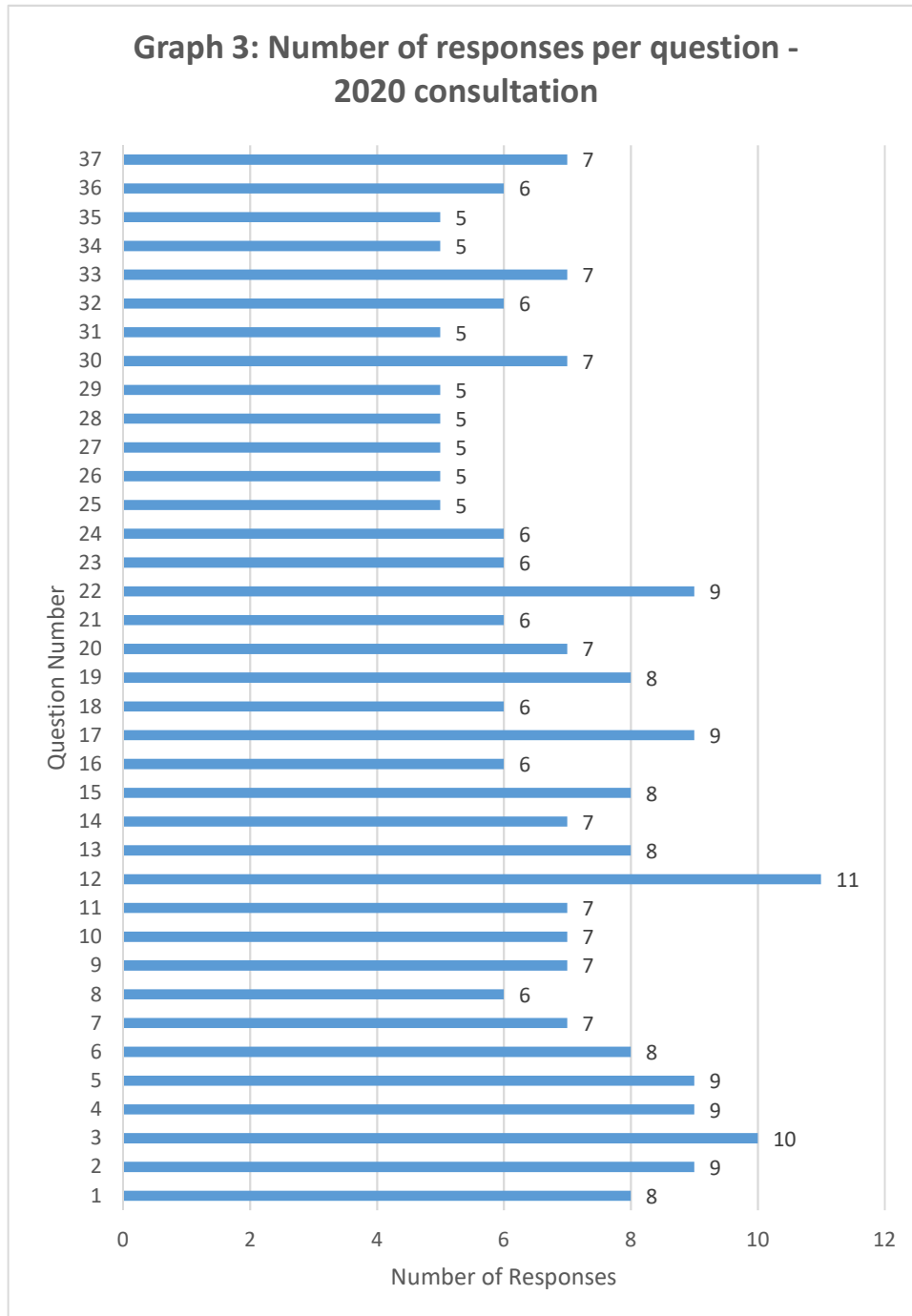
4.1 From those notified about the consultation on the Planning Obligations SPD, 22 people / organisations responded. Graph 1 below shows the breakdown of respondent type. As can be seen, the majority of responses were submitted by the general consultation bodies followed by specific consultation bodies and the general public.



4.2 Graph 2 shows the method by which these responses were made.

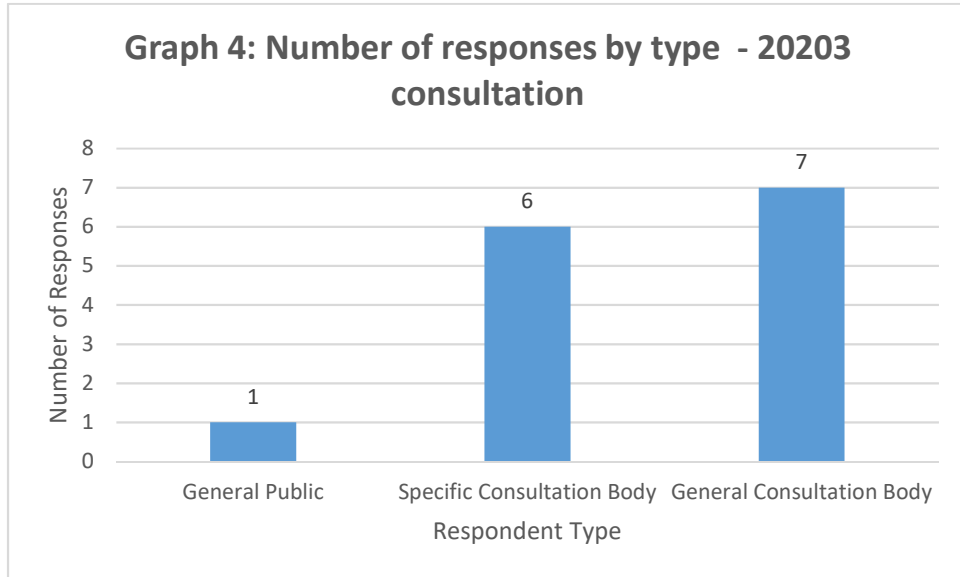


4.3 In terms of the questions answered, the most popular was question 12 (Do you have any comments about the proposed approach to establishing when to accept commuted sums?) that received 11 responses. Graph 3 below shows the number of responses to each question, or which could be attributed to each question.

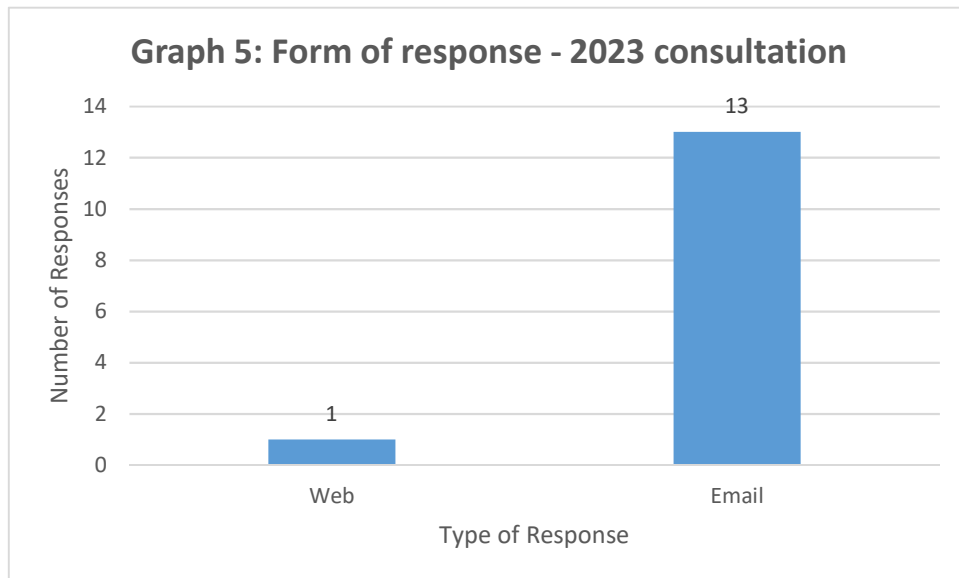


9 January – 20 February 2023 Consultation

4.4 From those notified about the consultation on the Planning Obligations SPD, 14 people / organisations responded. Graph 4 below shows the breakdown of respondent type. As can be seen, the majority of responses were submitted by the general consultation bodies followed by specific consultation bodies.

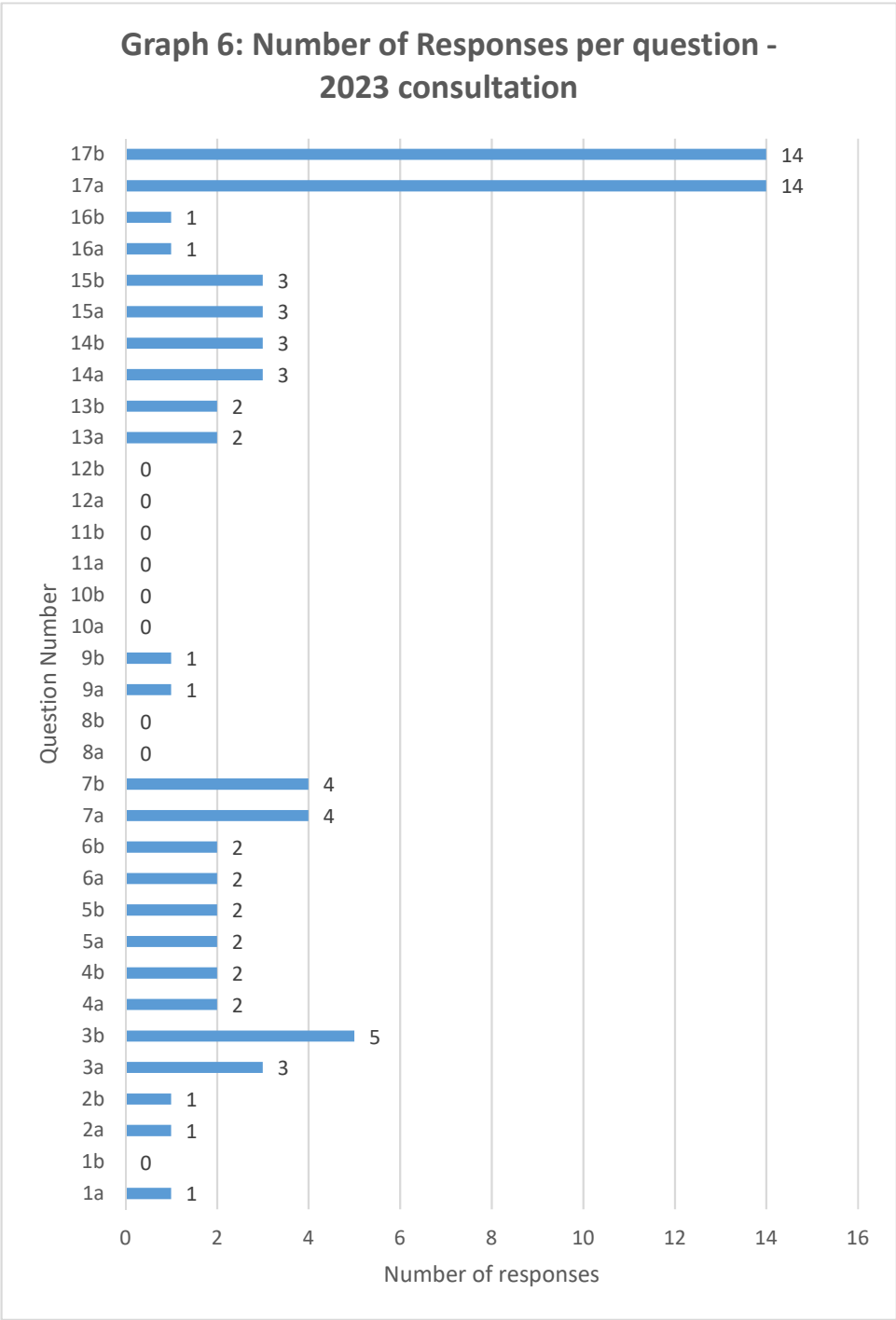


4.5 Graph 5 shows the method by which the above responses were made.



4.6 In terms of the questions answered, the most popular were questions 17 a) and b) (Do you have any other comments on the draft SPD (Q17a) and If yes please provide details (Q17b)) that received 14 responses. It should be noted that in some cases, respondents answered part a) of the question but not part b). In most cases, part b) was asking respondents to give their reasons for

their response to part a) of a question. Graph 6 below shows the number of responses to each question, or those that could be attributed to each question.



## 5.0 What was said and what was our response?

5.1 A summary of the comments received during both periods of consultation and our responses is set out in tables 5 and 6 below. This includes any changes that are proposed to be made to the SPD before the district council adopts it. In respect of the 2020 consultation, the council's responses reflect the position at the time the consultation was undertaken. For example, the Local Plan was yet to be adopted therefore it is referred to as the emerging Local Plan.

**Table 5 – Consultation responses, 6 March – 18 May 2020 consultation**

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q1 - Do you agree with the topics proposed to be covered in the SPD? Yes / No</b>			
N/A	AHSPD/2	Yes, agrees.	Noted.
N/A	AHSPD/7	No – Does not agree.	Noted.
N/A	AHSPD/11	Yes, agrees.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q2 – Are there any other matters which should be covered in the SPD?</b>			
N/A	AHSPD/2	Page 6: (2.2) Parking concerns – all developments should consider whether they are adding to the school run problems. Emissions are a big concern. Parking causes access issues on narrow roads.	Noted but not relevant to the Affordable Housing SPD.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AHSPD/2 continued	<p>Strive for off-road parking please as this supports Crime Prevention where available. In addition, it is imperative that there are no blind spots for pedestrians and vehicles to navigate.</p> <p>Review whether additional schools, health centres are required to cope with increased numbers that development will generate, as most schools are oversubscribed.</p> <p>Larger gardens should be offered as an additional option to encourage residents to grow their own crops. Contracts to include a clause that states the garden area (if provided) is not to become additional vehicle space.</p> <p>A clause to be added in housing contracts relating to maintenance &amp; appearance of property should</p>	<p>These matters would be addressed as part of the consideration as part of planning applications submitted. In addition, policies within the emerging Local Plan address issues of design and car parking.</p> <p>The need for infrastructure has been considered as part of the production of the Local Plan and that required for specific areas is contained in the Infrastructure Delivery Plan (IDP). In addition, the policy relating to housing allocations in the emerging Local Plan sets out some information about the infrastructure that will be required on sites. Other requirements will be identified as part of the consideration of individual planning applications. Where there is a requirement for new infrastructure, the council will seek to secure this via Section 106 agreements.</p> <p>The size of the gardens will be a matter for individual planning applications and the size of proposed housing plots. The detail of what is to be included in an individual contract relating to the occupation of an affordable home is not considered a matter for the SPD to address.</p> <p>This is not something for the SPD to address, as it is something that may be picked up as part of the detailed contracts when residents move into affordable homes.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AHSPD/2 continued	<p>be considered too, so areas do not become run-down in appearance like many areas of Mansfield. Once an area begins to look shabby and untidy, it does not take long to get worse.</p> <p>With the increase in ASB and difficulties to control this, older &amp; disabled residents wish to be shielded from this so a suitable type of housing for this vulnerable group is required to match this need.</p>	<p>The proposed approach to this is set out in paragraphs 2.45 – 2.51 of the draft SPD. However, as noted elsewhere, this is not a requirement (and cannot be a requirement, as it did not come forward as a policy through the Local Plan). The wording simply clarifies that if these standards are met this would be supported by the Council.</p>
N/A	AHSPD/7	<p>This needs to be a light-touch document to provide clarity on the provision of affordable homes in the district. Importantly, a commitment from the Council is required to work pro-actively and pragmatically with applicants to ensure schemes are delivered and remain viable.</p>	<p>Noted – The council will work with applicants regarding the issues of viability and deliverability. Paragraphs 2.21 – 2.27 of the draft SPD sets out the proposed approach to viability. Further information will also be set out in a separate Planning Obligations SPD.</p>
N/A	AHSPD/7	<p>The Zoning plan has been taken from the Local Plan examination documents. However, the district is much more complicated with a far wider range of house prices and this should be acknowledged.</p>	<p>This zoning approach was clearly set out in the whole plan viability testing, which was ultimately approved through an examination process. On this basis, it is consistent and appropriate for the Affordable Housing SPD to adopt the same zones.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
Historic England	AHSPD/11	Having reviewed the consultation information and questions, I can confirm that Historic England has no comments to make in respect of the draft SPD and the historic environment.	Noted.
N/A	AHSPD/12	The Council should include consideration of the fact that tenure requirements may differ on a site-by-site basis. Furthermore, the viability constraints of providing specialist accommodation should be considered. This type of accommodation has a higher cost than traditional residential development and this should be considered when viability is determined.	This is addressed in paragraph 2.21 of the draft SPD, which states that where viability is a challenge “ <i>it may be appropriate to consider changing the mix and / or level of affordable housing so the site can be developed.</i> ” In terms of specialist accommodation, the flexibility in the wording allows for viability testing to be undertaken when considered appropriate, which in our view captures this particular concern.
N/A	AHSPD/15	Is there a clause that constrains buyers from reselling or letting out the property?	It is not proposed to include anything specific about this in the SPD. If in place, this is something that would be in any contracts relating to the occupancy of the property.
N/A	AHSPD/16	I am happy you make my feelings brought too your committee. I was shocked when I sat and listened to what the council were thinking of proposing for the empty site on Sheepbridge Lane. If they were adamant regards the gypsy,	Noted – These comments are related to the use of a specific site and a specific application. As such, they do not relate to the Draft SPD.



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/16 continued	travellers site, I and many residents in the area were prepared to put up strong opposition. I welcome the idea for the land too be passed for planning for housing. I hope the committee share my thoughts and that of the local community. I would like to say that in regards for a proposal for permanent house, if affordable or otherwise I welcome the idea. As I state in the past I strongly object too any idea of turning the site into a traveller or gypsy site, for the obvious many reasons. The only suggestion I would like to make is that the park area at the side be more accessible for all too use and could this point be raised.	
Network Rail	AHSPD/17	Thank you for consulting Network Rail on the affordable Housing SPD. Just to confirm that Network Rail do not have any comments to make in relation to the SPD.	Noted
N/A	AHSPD/19	No comments.	Noted.
Natural England	AHSPD/21	No comment.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q3 - Do you have any comments about the SPD which are not covered by other questions?</b>			
N/A	AHSPD/1	Comment on Paragraph 1.5: The Government's full definition, as reflected in the Appendix, is not mentioned anywhere in the main document.	No change: Satisfied the definition is contained within the Appendix. There is reference to this in paragraph 1.5 of the main document: " <i>The full definition can be found in Appendix A.</i> "
N/A	AHSPD/1	Comment on Paragraph 1.9: We appreciate that this wording derives from the NPPF, however whilst the NPPF provides high level policy objectives it is for MDC in the SPD to set out how these objectives will be applied to planning applications in the Mansfield district. As such, the terms used need further clarification. For example, it is not clear what is meant by "the area" in the first bullet - Does this mean either Mansfield Urban Area or Warsop Parish? Does it relate to Affordable Housing Zones? County Council Divisions or the District.	For clarity, the SPD will apply to all developments that generate the need for affordable housing within Mansfield district.
N/A	AHSPD/1	Paragraph 1.9, second bullet point - Clarity is sought as to what is meant by "identified affordable housing need" and which document this comes from.	Paragraph 1.9 is taken from the NPPF. It is for local authorities to identify their housing needs. In terms of housing needs of specific groups in Mansfield, there is the Housing Needs of Particular Groups Study 2018 that can be viewed at <a href="https://www.mansfield.gov.uk/local-">https://www.mansfield.gov.uk/local-</a>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		Queries where people can obtain the information about need.	<a href="#">plan/evidence-support-local-plan-1/4</a> This is alongside other housing evidence base work that was used to inform the production of the Local Plan.
N/A	AHSPD/1	<p>It is unclear how the implementation of this policy will take account of the shortfall in anticipated affordable housing delivery referred to at Paragraph 61 of the Inspector's Report into the Examination of the Mansfield Local Plan.</p> <p>Similarly, it is unclear which specific "identified affordable housing needs of specific groups" are being referred to.</p>	<p>The SPD cannot do anything specifically to address the shortfall as referred to in the Inspectors Report. Its purpose is to provide guidance to developers in respect of the council's expectations on the provision of affordable housing within the district.</p> <p>Examples of the specific groups are set out within the 3<sup>rd</sup> bullet point (elderly or students).</p>
N/A	AHSPD/1	Comment on Paragraph 1.11: This should be "0.5ha or more" as per MM32.	Accept need for change: Current wording refers to "more than 0.5ha in size". Policy H4 refers to "where the site area is 0.5 hectares or more".
N/A	AHSPD/1	Comment on Paragraph 1.12: This language needs to be updated for consistency with MM32.	Accepted – Wording to be changed.
N/A	AHSPD/1	Comment on Paragraph 1.13: This is the pre-modification version of the policy and so is out of date and does not provide an adequate basis for this consultation.	Post modification version already shown in Appendix B.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AHSPD/1	<p>Comment on Paragraph 2.3: Is the only relevant document the Housing Needs of Particular Groups Study (2018)? If not, people need to be assisted in finding the other relevant documents.</p>	<p>Noted. The Housing Needs of Particular Groups Study is the only document that has been used to help provide evidence of need. The study also forms part of the evidence base for the Local Plan.</p>
N/A	AHSPD/2	<p>With the outbreak of the Corona Virus, is it likely that the consultation date will be extended please?</p> <p>Various other comments made including the incorrect version of the SPD being available on the website at the start of the consultation period. Various comments drafted about this version. Following further clarification and information provided by MDC on a number of occasions, it is felt that many of the points initially raised regarding the draft SPD had been addressed in the correct version of the document that was subsequently made available to view.</p>	<p>The consultation was extended by an additional 4 weeks to 18 May owing to COVID-19.</p> <p>Noted.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		Request that the correct version of documents are made available at the start of any consultation process.	Accepted – The district council will ensure that this occurs when undertaking future consultations.
Highways England	AHSPD/3	As affordable housing relates to issues outside the remit of Highways England, we do not have any specific comments to provide. However, we trust that the above is useful in the progression of the Mansfield Local Plan.	Noted.
Nottinghamshire County Council	AHSPD/5	Thank you for consulting me on this matter. I do not have any strategic transport planning observations to make and will not therefore be completing a response form	Noted.
Nottinghamshire County Council	AHSPD/6	Thanks for consulting NCC on the above; we have no comments to make.	Noted.
N/A	AHSPD/7	<p>It is assumed para 2.2 relates to separate SPDs that will be covered in the future. Clarity is needed.</p> <p>The topics in 2.1 are too wide ranging for a Supplementary Planning Document. Some of the</p>	<p>The bullet points in paragraph 2.2 are those areas that it is also proposed to cover within the Affordable Housing SPD.</p> <p>It is considered appropriate to provide detailed guidance on certain matters, including viability and tenure split. In terms of the latter, the SPD is not seeking to alter the Local Plan</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		issues, particularly viability and tenure split should be examined in much further detail and under further public scrutiny.	policy. The Local Plan sets out how much affordable housing will be sought in the different zones. The SPD is providing the detail of how the requirement will be apportioned by the different affordable housing tenures. As such, this is not introducing additional policy.
N/A	AHSPD/10	Preliminary Comments We are disappointed that the deadline for consultation on this very important SPD was not delayed by the Council to reflect the time we have all lost in establishing safe/home working practices and the difficulties faced by many in working from home.	Noted. The Council extended the SPD consultation deadline by 1 month to 18 May in recognition of COVID-19 issues.
N/A	AHSPD/10	It is impossible, as desirable as you may wish, to formulate a Borough wide “policy” of the type you have drafted. The object of providing Affordable Housing to those in need is accepted. It is set out in the Local Plan, which will shortly be Adopted by the Council. Affordable housing doesn’t appear by magic or out of thin air. It can only be provided on sites if there is sufficient value created from developing them to meet its cost. Every single site has different conditions affecting value. Some	<p>Noted – Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p> <p>In terms of matters that should have been covered by the Local Plan e.g. space standards. Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that reference to these standards can be retained. The Local Plan was found sound at Examination subject to modifications by an independent inspector and therefore all the matters that needed to be aired are considered to have been so.</p> <p>In respect of the provision of detail about tenure split, the</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued	<p>sites have easy access to power; some do not (Thus high costs of bringing power). Some sites are flat; others are not. (Thus huge costs of retaining walls, deep drains etc. etc.) Some have long frontages to adopted roads; some are narrow and long. (High infrastructure costs of roads and services in them). All of these factors affect the value. An understanding of this process is therefore essential – but sadly lacking in such as the suggested “commuted sums” of this SPD. Until individual sites come forwards it is impractical to assess their value and hence their ability to finance such as Affordable Housing. If the SPD is followed slavishly, which for the most part these guidelines suggest, then sites will not come forward. This SPD seems to focus on some matters, which could, and in fact should, have been exposed to examination during the Local Plan. In so far as commuted sums calculation and sub division of</p>	<p>SPD is not seeking to alter the Local Plan policy. The Local Plan sets out how much affordable housing will be sought in the different zones. The table under paragraph 2.5 of the Draft SPD is providing the detail of how the requirement will be apportioned by the different affordable housing tenures. As such, this is not introducing additional policy.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued	affordable housing tenures go beyond additional guidance we suspect they cannot be set out as proposed in this SPD. Sadly, we can find no evidence within this SPD that the additional costs of meeting its requirements will not render existing sites (consented or allocated) unviable. We also find that many of the questions posed do not allow a suitable response. We have therefore prepared the following for you to consider. We are disappointed that key matters were not aired in Local Plan where they would have been subject to proper examination.	
N/A	AHSPD/12	The Council should ensure that it future proofs the SPD and ensure it is adaptable to new government guidance and changes. A key consideration should be the Government's First Homes consultation. Although consultation is still open regarding this scheme, consideration should be given to incorporating any future changes that the	<p>It is considered that the allowance for site-by-site viability testing where appropriate, in particular, allows for potential changes in the future (which could affect scheme viability). The council will give consideration to the latest position on First Homes when the next version of the SPD is produced.</p> <p>In terms of incorporating government changes, care needs to be taken, as SPD's cannot introduce new policy. Therefore, any detail regarding First Homes will have to be dealt with via the Local Plan not the SPD.</p>



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		Government brings forward as a result of this.	
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/19	No comments.	Noted.
<b>Q4 - Do you agree with the proposal to not require 10% affordable home ownership options on sites in Mansfield District? Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted.
Notts CPRE	AHSPD/8	Yes, agrees.	Noted.
N/A	AHSPD/10	<p>It is unclear what is meant by this question, and unclear whether in any event “changes” to Local Plan Policy which sets out the targets can be made by means of this SPD.</p> <p>The percentages for Affordable Housing are set out in the Local Plan, at 5% or 10% dependant on location.</p> <p>The NPPF provides that Affordable “ownership” is one form of Affordable Housing and so in principle affordable home ownership (i.e. houses offered at 80% of market value) could be fully satisfy the Local Plan need for affordable housing on Zone 1 Sites and partially meet them on</p>	<p>The question is seeking comments on the approach proposed in paragraph 2.3.</p> <p>Accepted, the SPD is not seeking to require a different amount of affordable housing to that within the emerging Local Plan. It is giving advice on the split between affordable housing tenures.</p> <p>Noted – The table on page 5 of the draft SPD sets out the tenure split that the council will seek. This is open for negotiation based on the individual case and housing need present at the time.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		Zone 2 “green” field sites.	
N/A	AHSPD/12	No – Does not agree.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	No – Does not agree. We should look for a minimum of 10% affordable home ownership given that Mansfield is a low wage area.	The reasons for adopting this approach are set out in paragraph 2.3 of the draft SPD. However, the council will seek to be flexible taking account of the most up to date information available on housing need.
<b>Q5 - Do you agree with the proposal to round to the nearest whole number? Yes / No</b>			
N/A	AHSPD/1	No – Does not agree.	Noted.
N/A	AHSPD/7	Yes, agrees.	Noted.
N/A	AHSPD/10	No – Does not agree.  The need for a “rounding mechanism” could be avoided by providing for “commuted sums” to provide a payment for the “fraction” of a house in instances where the calculation does not produce a whole number of dwellings.  In any event there is no evidence to justify “rounding up”. Rounding down is to be preferred on small sites, where viability is likely to be much more sensitive to only small	Noted.  Would query how this would operate in practice e.g. how would this be calculated and where would it be spent. If it is payment for the “fraction” of the house it is uncertain as to whether the amount secured would be sufficient to pay for an additional home either on or off site.  It is established practice that 0.4 of a dwelling or less will be rounded down while 0.5 or more will be rounded up. The concern about viability is noted however if developers consider this an issue it can be addressed via the approach set out in paragraphs 2.21 – 2.25 of the draft SPD.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		changes. Rounding up may affect the delivery of both Open Market and Affordable Homes on small sites and for consistency, and to avoid an arbitrary threshold if rounding is to be used then rounding down should be applied in all cases.	
N/A	AHSPD/12	Yes, agrees.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	No – Does not agree.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	No – Does not agree.	Noted.
N/A	AHSPD/19	No – Does not agree. My view is that numbers should always be rounded up; “more than 5” should be 6, not 5.	It is established practice that 0.4 of a dwelling or less will be rounded down while 0.5 or more will be rounded up.
<b>Q6 - Do you agree with the proposed split between social rent, affordable rent, starter homes and intermediate? Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted
N/A	AHSPD/10	No. Whilst the Local Plan refers to other forms of affordable housing tenure this SPD cannot alter Local Plan policy. The Consultation Draft SPD is unclear but appears to misrepresent that the proposed “sub split” percentages are as set	The SPD is not seeking to alter the Local Plan policy. The Local Plan sets out how much affordable housing will be sought in the different zones. The SPD is providing the detail of how the requirement will be apportioned by the different affordable housing tenures. As such, this is not introducing additional policy.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued	<p>out in Policy H4 of the Local Plan. In fact, the only splits set out are the percentages of affordable housing in each zone. The proposed percentages for such as Intermediate Housing, Social Rent Housing etc. therefore go beyond the provisions of the Local Plan and were presumably not subject to debate at that time. We query therefore whether the SPD is attempting to set an additional policy – not permitted in an SPD.</p> <p>As mentioned above if a developer of a Zone 1 sites choses to do so it may satisfy the Local Plan policy need for affordable housing by providing it all as Starter/Affordable Ownership Homes. Although it is fair to say that where a need is identified for other forms of tenure that could be provided by negotiation even on these sites. On Zone 2, “green” field sites (where 20% affordable homes are a policy requirement) then other forms of tenure could be required</p>	<p>Whilst the tenure split will be that sought by the district council, this is open for negotiation on a case-by-case basis based on the individual site and housing need present at the time. The SPD has been amended to clarify this.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued	<p>subject to justification by need and circumstances at the time, for the remaining 10% of affordable housing requirement. Whilst there is some support for a variety of “tenures” to suit need, those needs will vary over time and by location. Even if, as we doubt, incorporating these splits into the SPD can be justified they are inflexible to changing needs/locality, and is an approach currently not justified by evidence. The Local Plan Inspector widened the Council’s definition of affordable housing to reflect the additional types of provision referred to in the NPPF and she observed at Paragraph 90 that; “Policy H4 sets out a reasonable approach in seeking to ensure that the type and tenure of affordable housing reflects evidence of local housing need. Whilst document VA2 concluded that the 2019 NPPF requirement for 10% affordable home ownership on sites of 10 or more dwellings would improve scheme</p>	

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued	<p>viability, the mix and type of affordable housing to be provided is best decided on a scheme by scheme basis, based on the Council's evidence of need and local incomes."</p> <p>We see no reason to suggest that the Local Plan approach set out at Paragraph 3 of Appendix 3 is not sufficient, requiring current circumstances and need to be considered on a site-by-site or area basis at the time a site comes forward. On a more practical note, further sub division of percentage splits of requirements simply does not work especially where small numbers are involved. For example, on a scheme generating a need for 5 affordable dwellings applying a percentage would result in: 1% Social Rent - 1 dwelling 2.5% Affordable Rent – 2.5 dwellings 0.75% Starter Homes – 0.75 of a dwelling 0.75% Intermediate – 0.75 of a dwelling. Clearly, these parts only of a</p>	<p>As stated above, whilst the tenure split will be that sought by the district council, this open for negotiation on a case-by-case basis based on the individual site and housing need present at the time. The SPD has been amended to clarify this. Where rounding creates an issue, negotiation will take place to determine the type of affordable homes that would be provided.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		house cannot be provided. It also begs the question as to how or if rounding could be applied to these “sub-sets” without potentially adverse consequences for viability.	
N/A	AHSPD/12	No – Does not agree.	Noted
N/A	AHSPD/13	Yes, agrees.	Noted
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes. I broadly agree with the split but recent experience has shown elderly persons’ shared ownership to be hugely popular, so we need to be flexible on schemes.	Noted – The council will seek to be flexible taking account of the most up to date information available on housing need.
<b>Q7 - Do you agree with the proposed starting point for the size of affordable homes required on site? Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted
N/A	AHSPD/12	No – Does not agree.	Noted
N/A	AHSPD/13	Yes, agrees.	Noted
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	No – Does not agree.	Noted.
N/A	AHSPD/19	No – Does not agree.	Noted.
<b>Q8 - Are there any other factors that should be taken into account when making the final decision on the size of dwellings?</b>			
N/A	AHSPD/2	I cannot comment, as I would like to see plans.	Noted – As part of planning applications for development plans would be available to view on the council’s website. <a href="https://planning.mansfield.gov.uk/online-applications/">https://planning.mansfield.gov.uk/online-applications/</a>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/2 continued.	Buildings need to be in line with their surroundings. In addition, buildings should not be an eye sore or become outdated quickly like a lot of buildings in Mansfield Town Centre (Stockwell Gate flats is one example of a housing development).	The physical characteristics of the site would be considered and this is confirmed in the 4 <sup>th</sup> bullet point of paragraph 2.8 of the draft SPD. In addition, policies within the emerging Local Plan e.g. P1 address the issue of the design of development. The ability to comply with this policy, along with others in the Local Plan, would be considered as part of applications submitted for development.
N/A	AHSPD/7	The delivery of affordable housing should be led on a case-by-case basis. The reference to a document produced for the Local Plan is already two years old. Providing a reliable evidence base when there is a dynamic population and house price change in the market is difficult and therefore the SPD should not tie down any requirements. It needs to offer flexibility and adapt to these changing circumstances.	The SPD does not seek to tie down requirements. Paragraph 2.7 confirms that the table of affordable home sizes is a starting point. As such, there will be flexibility to take account of varying circumstances. In addition, paragraph 2.21 of the draft SPD confirms that, where viability issues are demonstrated, there may be some flexibility in the amount or mix of affordable housing that is provided.
N/A	AHSPD/12	It is vital that the existing affordable stock is included in any calculation of new need. In particular, the average re-lets of each size of homes should be deducted from the total figures. The Housing Needs of Particular Groups Report (2018) goes some	This matter can be picked up as part of bullet 2 (the existing supply of affordable housing in the area).



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		way to understand the tenure and mix required. However, it does not assess affordability for those on the waiting list and lacks a balanced assessment of the various ownership tenures.	
N/A	AHSPD/15	Is there a set floor area per size of dwelling?	Noted – There is no specific floor area for affordable housing. The figures in the table underneath paragraph 2.7 of the SPD are a starting point and would be subject to negotiation.
N/A	AHSPD/18	Not bed sits or one bedroom.	Noted – Paragraph 2.8 confirms that final decisions will be made on a case-by-case basis having considered a number of factors.
N/A	AHSPD/19	Q8 comment - Reappraisal of the supply of larger house types in the social housing sector.	This matter can be picked up as part of bullet 2 (the existing supply of affordable housing in the area).
<b>Q9 - Do you have any comments about the size of affordable homes to be required?</b>			
N/A	AHSPD/1	Further to Question 5 above, in order to guard against the gaming of the system, perhaps there could be a clarification that if there is the appearance that land splitting, development phasing and so on might have been designed in such a way that affordable housing requirements are artificially rounded down, then the figures will be rounded up so as to maintain confidence in the	The concern about developers putting in schemes below the threshold is noted. Where a number of such sites come forward that adjoin each other, it may be possible to consider the cumulative impacts on infrastructure. However, this will be on a case-by-case basis. The district council are unable to seek contributions on individual sites that come forward and which are below the nationally agreed threshold for seeking obligations

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/1 continued.	planning system. To achieve this propose that Mansfield adopts the approach applied by Scarborough with respect to inclusion of guidance along the following lines: "Where the Local Planning Authority has accepted a lower affordable provision it reserves the right through the legal agreement to re-assess the viability of a site, especially on large and strategic scale sites to ensure the maximum amount of affordable homes is achieved".	
N/A	AHSPD/1	Require commuted sums in all instances where the number of affordable houses are rounded down to cover the fraction of the affordable house required.	Noted but not agreed. Para 2.6 provides reasonable clarity that where the number of affordable homes does not equal a whole number the requirement will be rounded to the nearest whole number.
N/A	AHSPD/7	Notwithstanding the comments above (question 8), there is a significant amount of 1 bed being asked for. The focus should be on 2 and 3 bed to ensure there is room for small families. The overabundance of 1 bed will encourage further renting and a shift from affordable home ownership. A robust evidence	Noted. Paragraph 2.8 confirms that final decisions will be made on a case-by-case basis having given consideration to a number of factors.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		base needs to be formulated to justify this housing mix.	
N/A	AHSPD/9	<p>Yes - The district wide figures fail to take into account local variations in housing mix requirements and may not accurately reflect what is needed in certain areas of the district (where figures could be significantly different) nor do they take account of the likelihood that needs will change over the period of the SPD. Overall, we consider it is too prescriptive and inflexible as currently worded. Whilst the requirement to consider mix on a case by case basis is acknowledged to an extent at paragraphs 2.7 and 2.8 of the SPD we recommend that this section be amended to make clear that deviation from the district wide requirement (to a potentially significant degree) is to be expected in certain areas and that such (where appropriately evidenced) would not be considered a reason for refusal of planning applications.</p>	<p>The draft wording in the SPD is not prescriptive about the size of affordable houses, which allows for variation having given consideration to a number of factors. Furthermore, the allowance of site-by-site viability testing enables flexibility if any concerns about affordable housing dwelling sizes are raised within the context of a viability challenge.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued.	The SPD should also confirm that, in circumstances where a commuted sum is to be made in lieu of on-site provision, the anticipated mix to inform calculation of this sum will be made on a case-by-case basis and will not rely on the district wide requirement set out under paragraph 2.7. It is essential that the provisions set out within the SPD are robustly justified and do not undermine deliverability of new homes or the Local Plan objectives. We reserve the right to comment further on the specifics of required housing mix (including size and tenure) in future.	Paragraph 2.7 confirms that the size of houses in the table is a starting point. This gives the flexibility required for it to be assessed on a case-by-case basis.
N/A	AHSPD/12	No, please see response to question 8.	Noted
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/18	Not bed sits or one bedroom.	Noted – Paragraph 2.8 confirms that final decisions will be made on a case-by-case basis having given consideration to a number of factors.
N/A	AHSPD/19	See Q8 above. No other comments.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q10 - Do you agree that commuted sums should be accepted where there would be fewer than five social rent, affordable rent and intermediate homes on site? – Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted.
N/A	AHSPD/10	<p>Regrettably, we are not made aware of the discussions (or with whom they were undertaken) referred to in Paragraph 2.11 of the SPD. As such, there is no evidence or data to support a threshold of 5 units. Incidentally, there is a significant typo in this paragraph – immediate should we think read as “intermediate”.</p> <p>It does however strike us that 5 is a relatively small number to achieve a suitably efficient management regime. A 10 dwelling minimum might be more appropriate at which to allow the choice of either on site provision or commuted sum provision. The SPD threshold is further clouded and confused by the suggestion that commuted sums will not be appropriate if “there are other properties in the immediate area managed by the same registered provider”. That begs the questions</p>	<p>These are based on internal discussions with colleagues from the council’s housing department. The typographical error is noted and the spelling has been amended as required.</p> <p>The 5 dwelling threshold is considered reasonable. If the 10 dwelling threshold proposed by the respondent were adopted, this would double the size of the number of dwellings that would be provided before on-site provision is made. This would reduce the opportunities for securing on-site affordable housing within the district.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		of what is the “immediate area or how can there be a “same registered provider”, and even how then to deal with a monopoly situation.	
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	No – Does not agree.	Noted.
N/A	AHSPD/19	Yes, agrees but only subject to the caveats in the document.	Noted.
<b>Q11 - Do you agree that commuted sums should be accepted where no registered providers are willing or able to take on the social rent, affordable rent and intermediate homes required on site? Yes / No</b>			
N/A	AHSPD/4	No – Does not agree.	Noted.
N/A	AHSPD/7	Yes, agrees.	Noted.
N/A	AHSPD/10	Yes, agrees although notes that affordable rent houses are not required to be held by registered providers.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/18	No – Does not agree.	Noted.
N/A	AHSPD/19	Yes, agrees but subject to robust evidence being provided that no registered providers are interested.	Noted.
<b>Q12 - Do you have any comments about the proposed approach to establishing when to accept commuted sums?</b>			
N/A	AHSPD/1	Commuted sums could also be accepted where rounding results	Para 2.6 provides clarity that where the number of affordable homes does not equal a whole number the

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		in a partial house to discourage 'gaming' of the system and under-provision of affordable housing through multiple schemes all rounding down.	requirement will be rounded to the nearest whole number.
N/A	AHSPD/2	<p>There should be no monetary gain.</p> <p>I do not feel suitably qualified to comment on Q10 &amp; Q11 - could any future consultation include a box for "don't know". This also applies to other questions I have not answered.</p>	<p>Accepted – The council will seek to ensure that developers do not gain financially by providing a commuted sum rather than making on-site provision of affordable housing.</p> <p>Noted.</p>
N/A	AHSPD/4	I suppose my only real concern on this, is the value we put on Affordable Housing, should Builders want to make a payment instead of building for this purpose. I believe it is £25K per house. I am not sure I even agree with this premise that builders are entitled to make payments in lieu of building property. Far better they build them if this is the law!	Concerns are noted. Whilst the starting point within the emerging Local Plan is that affordable housing will be provided on-site, it is acknowledged that there may be circumstances when the provision of commuted sums is more appropriate. This SPD seeks to provide clarity on when commuted sums will be acceptable and how they will be calculated.
N/A	AHSPD/4	Should we require a policy and offer a payment structure, this figure should at least go a long	Noted – The council will seek to ensure that the commuted sum calculation generates a contribution that reflects the cost of provision and ensures that the district council can

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		<p>way to enabling this Council to build Affordable Homes elsewhere.....£25K does not. A closer figure might be £100K per dwelling. What do other Districts do?</p>	<p>deliver the affordable housing required. Other districts take various approaches that will be subject to consultation prior to being adopted.</p>
N/A	AHSPD/7	<p>Affordable housing should be on sites of greater than 10 plots (in line with Local Plan policy H4). The commuted sums should follow the same.</p>	<p>Noted. Policy H4 refers to 10 units or more.</p>
N/A	AHSPD/9	<p>Yes – the scope of consideration for when commuted sums will be accepted (as set out at paragraph 2.10) is far too narrow, lacks the requisite flexibility as set out in the NPPF and is not consistent with emerging local or adopted national planning policy. Paragraph 62 of the NPPF sets out that where a need for affordable housing is identified, planning policies should expect the requirement to be met on-site unless off-site provision or an appropriate financial contribution can be robustly justified. Paragraph 5.39 of the emerging</p>	<p>It is considered appropriate for the SPD to clarify when commuted sums will be acceptable.</p> <p>The criteria currently within the draft SPD have been amended to include the circumstances that are set out in the Affordable Housing policy of the emerging Local Plan and the NPPF.</p>



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued	<p>Local Plan also notes that off-site commuted sums (in total or in part) may be made rather than on-site contributions where there is evidence to suggest that there are site specific constraints or demonstrable viability issues, or there is already a substantial amount of affordable housing in close proximity to the site. Off-site contributions may also be appropriate where it can be shown, in discussion with the Council that they can contribute to the successful provision of affordable housing elsewhere within the district and/or where affordable housing need may be more pressing, including key regeneration sites and the regeneration of existing social housing. Neither the NPPF position nor that of the emerging Local Plan are accurately reflected in the emerging SPD. Whilst provision of onsite affordable housing should therefore be the starting point for consideration, it is important to</p>	

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued	<p>acknowledge that there are a range of complex and diverse factors that may result in on-site provision not being viable.</p> <p>If the SPD does not provide appropriate flexibility to deal with these complexities, then it could undermine the deliverability of key sites within the district (and therefore the deliverability of the Local Plan). At present, whilst we agree with the 2no. considerations set out at paragraph 2.10, the scope is far too limited and does not make provision for some site-specific factors which local and national planning policy state should be taken into account. In limiting consideration to these two matters only, the document also fails to acknowledge that there may be specific circumstances where starter home provision cannot be made on site (as is currently set out at paragraph 2.13). Cognisant of the above we recommend that the SPD is amended to emphasise that</p>	<p>It is acknowledged that the SPD needs to be flexible to be able to respond to reflect site-specific issues. It is considered that the provision of guidance on the circumstances when commuted sums may be acceptable is appropriate. As stated above, the criteria currently within the draft SPD have been amended to include the circumstances that are set out in the Affordable Housing policy of the emerging Local Plan and the NPPF.</p> <p>The need for the developer to provide justification for paying a commuted sum instead of making on site provision is noted and where appropriate the SPD will be amended.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued	<p>acceptance of commuted sums will require robust justification but be determined on a case-by-case basis, taking into account site specific circumstances. We would advise against inclusion of specific set criteria in the SPD against which consideration of commuted sums will be made as this could unintentionally restrict sites where credible, robust and justified reasoning for a commuted sum in lieu of on-site provision exist but exceptional circumstances have not been anticipated within the Council's SPD list. Should the Council wish to include reference to key considerations that will inform this decision within the SPD we recommend that these are kept at a high level and provide sufficient flexibility so as not to hinder housing delivery on complex sites with unique circumstance and constraints.</p>	
N/A	AHSPD/10	<p>Yes, this should also include for instances where there is no identified need for affordable</p>	<p>Noted but not agreed – Contributions for affordable housing, along with other planning obligations can only be sought where there is an identified need and where they</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued.	housing.	meet the 3 statutory tests as set out in the NPPF namely:  a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development.
N/A	AHSPD/12	The timing of payment of commuted sums should be considered. The timing of such commuted sum payments needs to be agreed. It is big cost to a developer and should be made at intervals throughout the development. It is unreasonable to expect commuted sums to be made as an upfront payment.	Accepted - The triggers for payment of financial contributions will be considered on a case-by-case basis. Where appropriate, trigger points will be included in the section 106 agreement, as will any time by which the contribution is to be spent. Wording to this affect will be added to the SPD.
N/A	AHSPD/15	Is there a defined commitment and timescale as to re-allocating these sums?	Noted – The Section 106 agreement relating to the development would set out what the commuted sum should be spent on and the timescales for spending these monies.
N/A	AHSPD/18	Never.	Noted.
N/A	AHSPD/20	Commuted Sums section Paragraph 2.18. That once a figure for a Commuted Sum has been established in line with a formula current at that time then the final figure should not be less than that but to rise in line with inflation or increased property	Noted – It is important to ensure that when the commuted sum is paid, that it reflects the changes in costs that will have occurred from when the Section 106 legal agreement is signed. Therefore, all commuted sums will be subject to indexation. Clarification of this will be provided within the SPD.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/20 continued.	values whichever is the greater. Reasoning behind this comment of course is to increase the level of funding for affordable housing but would encourage commercial house builders to develop housing sites at quicker pace and not land bank if the final Commuted Sum agreement was rising in line with inflation or property values.	
<b>Q13 - Do you agree that establishing a per dwelling figure is the most appropriate way of establishing the commuted sum? Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted.
N/A	AHSPD/9	No – Does not agree.	Noted
N/A	AHSPD/10	<p>No – Does not agree.</p> <p>It is one way and its appropriateness depends heavily on the method of computation. See responses below. It should not be fixed at a level that would cause developments to stall or affect the viability of existing land holdings/sites.</p> <p>There are other methods which can be used and which can help to bring forward off site provision</p>	<p>Noted</p> <p>The impact on the viability of a scheme is acknowledged. Where a developer is concerned about the impact of the commuted sum on a schemes viability they should follow the approach set out in paragraphs in 2.21 – 2.25 of the draft SPD.</p> <p>Accepted - Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued.	<p>of affordable housing. For example, a sum per square metre of market housing built. Again, much depends on the method of calculation.</p> <p>The latter system has the advantage of being easily incorporated into S106 Agreements even where, as is often the case at outline planning permission stage, the numbers of dwellings and their floor area is not known. That could help the speedy delivery of much needed market housing.</p>	As set out above, following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	No – Does not agree.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, if this is broadly in line with the approach adopted by other authorities, otherwise no further comments.	Noted.
<b>Q14 - Do you have any comments on the build costs or plot values used to calculate the per dwelling figure?</b>			
N/A	AHSPD/7	The calculation [for commuted sums] is not clear within the body of the document but there is further information in Appendix C.	Noted – Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/7 continued.	<p>There are multiple issues with how the sum is arrived at: - The use of 2018 data is out of date. There is reference to updating this in line with BCIS but this has not yet occurred.</p> <p>A 'Plot Value' is included. It is unclear as to what this is or how the figure is arrived. If it refers to land cost, then this is an unnecessary uplift of the commuted sum when the majority of ways of spending the sums does not require land purchase.</p>	<p>See comment above about reviewing the approach to calculating the commuted sum. In terms of updating the commuted sum in line with BCIS, this indexation would be applied at the time at which payment of the commuted sum became due. The timescales for payment of commuted sums will be set out in the Section 106 legal agreement.</p> <p>The plot values shown in the SPD are taken from paragraph 4.37 of the Mansfield Whole Plan and CIL Viability Study (June 2018). The figures reflect the 'benchmark land values' for each development type.</p>
N/A	AHSPD/9	<p>In continuation to Question 13 above, we object to the proposed 'establishing a per dwelling figure' approach. Using a fixed price per dwelling which relies on a standardised assumption on 'plot value' is not appropriate given that there are so many variables involved in determining land value which can vary significantly on a site by site basis. Seeking to establish a fixed price on something that has such a big variance cannot be said to be</p>	<p>Noted – Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued	<p>fairly or reasonably related to each development and as such, the requirement does not comply with paragraph 56 of the NPPF or Regulation 122(2) of the Community Infrastructure Levy Regulations. We also have concerns regarding sums currently sought and it is not clear how this would work in practice – it is suggested that the Council would benefit from the ability to deliver affordable units at no cost and then also make profit from the delivered units. For example, as the Council appear to be seeking the full cost of delivering an affordable unit at the site, in circumstances where this were to be paid the Council would benefit from the ability to deliver an affordable unit free of charge (i.e. costs covered by the commuted sum paid by the developer) plus, they would then benefit from the income generated when the units were sold privately or to an RSL. This is significantly different to the financial cost which would be</p>	



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued	<p>incurred by a developer delivering units on site where the financial cost to them would be the difference between the value of the unit on the market and the requisite reduction in value when sold to private individuals or an RSL – there is no evidence to suggest that the off-site contribution figures proposed have been sufficiently and robustly tested. Sales value therefore needs to be deducted from commuted sums to ensure that an ‘equivalent value’ (as required under emerging Policy H4) is requested and not a value that is significantly above this. Agreement of sales value is a commercial matter and highly dependent on site circumstances alongside a range of micro and macro-economic factors. It is not considered that a district wide sales value could fairly and reasonably be applied to units and therefore, again, seeking district wide commuted sums would not be in accordance with the NPPF</p>	

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued.	<p>or CIL regulations.</p> <p>The proposed mechanism for review (as set out at paragraph 2.17) is also insufficient as it lacks clarity around how updates would be undertaken, does not explain how sufficient opportunities for review and consultation on such updates will be made, fails to explain the methodology and assumptions which would inform these updates and does not demonstrate that the process for ensuring the evidence base and proposed revised commuted sums would be appropriately tested. The above therefore leads to concerns in terms of the legality of the proposed approach and risks undermining the ability of developers to deliver housing in Mansfield - compromising the deliverability of the Local Plan.</p> <p>The per-dwelling commuted sum approach should therefore be removed in its entirety from the SPD, and instead, be replaced</p>	<p>Accept that review mechanisms need to be clearly set out.</p> <p>As noted above, following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued.	<p>with an approach that will confirm commuted sums on a case-by-case basis, taking into account site-specific considerations and local variables in determining the appropriate cost. In terms of build costs or plot values, as set out above, we do not consider that setting a standardised assumption for plot value in calculating commuted sums across the district is fairly or reasonably related to the scale and kind of each development in question and as such, the requirement does not comply with paragraph 56 of the NPPF or Regulation 122(2) of the Community Infrastructure Levy Regulations. The per-dwelling commuted sum approach is not supported and should be removed from the SPD. We also wish to raise concerns regarding reliance on viability work undertaken in 2018 – these figures are now two years old and may therefore not be reflective of the most current economic circumstances or accurately reflect key viability</p>	

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued.	<p>considerations that need to be taken into account. These figures must be reassessed to ensure they are accurate, robust and based on up to date information.</p> <p>Please note that we do not wish to make any comment on the specific values used in deriving figures for the build cost or plot value assumptions at this time but reserve the right to provide comment on these aspects of the SPD in future.</p>	Noted.
N/A	AHSPD/10	<p>This methodology represents a massive increase to the “commuted sums” from £25,000 per dwelling to well over £215,000 per dwelling in some instances. See below. We are slightly “hamstrung” by the Covid 19 “lock down” and home-working but believe the build costs are broadly consistent with current evidence.</p> <p>However, we do not recognise the “plot values” which do not appear to relate to the land values</p>	<p>It is acknowledged that the figures are likely to be higher than the £25,000 per dwelling sought in the councils current Affordable Housing Interim Planning Guidance <a href="https://www.mansfield.gov.uk/downloads/file/766/affordable-housing-ipg">https://www.mansfield.gov.uk/downloads/file/766/affordable-housing-ipg</a> However, the IPG came into effect on 1 April 2008. Therefore, it is important that the calculation used reflects the fact that the costs of providing affordable homes has changed in the intervening 12 years. If the figure stayed at a standard £25,000 per dwelling it would mean that there would be a shortfall and it would not be possible to deliver the affordable housing that is required.</p> <p>The plot values shown in the SPD are taken from paragraph 4.37 of the Mansfield Whole Plan and CIL Viability Study (June 2018). The figures reflect the ‘benchmark land values’</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued	<p>adopted in such as Viability Assessments where threshold land values of £284,000 per hectare are used for green field sites and £494,000 for brown field sites.</p> <p>A rough analysis of the proposed plot value per dwelling would equate to a payment requirement vastly in excess of these figures at around £935,000 per hectare for brown field land and £730,000 per hectare for green field land.</p> <p>This analysis (of the table in Appendix C) exposes a questionable difference between the higher value plot values - about 28% higher per ha - ascribed to previously developed land and that applied to green field sites. It shows a somewhat confused and confusing approach to a very important issue.</p> <p>We would expect the value of brown field land to be lower - not higher – than the value of green</p>	<p>for each development type.</p> <p>As noted above, following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p> <p>As noted above, following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p> <p>As noted above, following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		field sites, if for instance there are additional costs associated brown field for example the cost of demolishing existing buildings.	
N/A	AHSPD/12	We question what the source of this information is, and would request that the Council provide further information to enable adequate analysis of the build costs and plot values they have used to calculate the per dwelling figure.	<p>The build cost data used comes from that to inform the whole plan viability study (dated June 2018) that dates back to Jan to March 2018.</p> <p>The plot values shown in the SPD are taken from paragraph 4.37 of the Mansfield Whole Plan and CIL Viability Study (June 2018). The figures reflect the 'benchmark land values' for each development type.</p>
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/18	Both used.	Noted.
<b>Q15 - Do you have any comments about the approach to calculating the financial contribution?</b>			
N/A	AHSPD/1	In an instance where a 6-month review changes the sum for an application that has already been submitted but has yet to secure planning consent it is unclear whether the older or the newer sum would be used as the basis for the calculation. Similarly, there may be changes between the outline application and reserved matters applications or changes as part of variation applications. If the sums were fixed at the time that the planning application is	Noted – Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/1 continued	<p>first being made then this could encourage gamesmanship whereby applicants withdraw applications where the sum is reduced in order to take advantage of the lower rate and/or expand a scheme beyond the original proposal in order to protect against a higher rate.</p> <p>Propose that Mansfield adopts the approach applied by Scarborough with respect to inclusion of guidance along the following lines: "Where the Local Planning Authority has accepted a lower affordable provision it reserves the right through the legal agreement to re-assess the viability of a site, especially on large and strategic scale sites to ensure the maximum amount of affordable homes is achieved".</p> <p>Suggest that Mansfield adopts the approach applied by Scarborough with respect to inclusion of guidance along the following lines: "The best use should be made of</p>	<p>The provision of review and clawback mechanisms to allow viability reappraisal covers wider issues than just affordable housing. This matter will be addressed separately within the Planning Obligations SPD that is due to be prepared by the council as set out in emerging Local Plan policy.</p> <p>The council acknowledge that it is important to ensure that the best use of land is made and that there is a suitable mix of housing. This matter is address in emerging Local Plan Policy H3 (Housing density and mix). On adoption of the Local Plan, this policy will be used when considering</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/1 continued.	sites suitable for housing development. If a scheme is considered to be not making best use of a site by not delivering the number or range of dwelling types required to balance the local housing market or meet local housing needs without good reason, then it will be refused".	applications for housing developments within the district.
N/A	AHSPD/7	It is not clear how the calculation is arrived at and is not a standard approach. A simplified approach that reflects the local circumstances is to have the payment as a % of OMV of the private plots that are delivered (in lieu of affordable). The build cost of the plot is unchanged (whether affordable or private), therefore adding it to the commuted sum is unjustified. The calculation in the SPD is unsupported, disproportionately large and will reduce the viability of sites significantly.	Noted – Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.
N/A	AHSPD/10	Yes. Even aside from the question of “plot values” above, this method exposes a serious misunderstanding of the	Noted – Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued.	<p>economics of development.</p> <p>In seeking a commuted sum to cover the full land and build cost of the affordable housing element of a scheme rather than it's "net cost", it significantly adds to the cost of development contrary to the NPPF, as referred to at Para 1.17 of this consultation document. The payments would grossly exceed the net cost of providing affordable housing on site. Where on site provision is not possible, commuted sums at the level proposed would render otherwise acceptable schemes unviable.</p> <p>Importantly we also believe that this "formulaic" methodology falls foul of current Government guidance that prohibits this type of approach that states: - <i>"It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting</i></p>	<p>See comments above regarding the approach to calculating the commuted sum. Where a developer has concerns about viability, they should follow the approach set out in paragraphs 2.21 – 2.25 of the draft SPD.</p> <p>The adopted local plan confirms that commuted sums may be sought for off-site provision. The SPD provides clarity on how these sums may be calculated.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued.	<p><i>evidence base documents, as these would not be subject to examination.”</i></p> <p>Whilst some might think that a useful windfall can be secured by the proposed method, in reality, those sites where a commuted sum is necessary or desirable will simply stall and housing delivery will suffer unnecessarily.</p> <p>The previous policy (query whether it remains current given the Local plan is silent on the amount) on commuted sums sought a payment of £25,000 per dwelling. In contrast, the lowest level now proposed would increase the commuted sum to almost 4 times that amount. We do not have access to the calculation of the previous sum but it seems reasonable to assume it was loosely based on the net gain to the developer arising from not providing affordable housing on site.</p>	<p>The purpose is not to generate a windfall but to seek a contribution that helps secure off-site affordable housing when on-site provision is not possible.</p> <p>It is acknowledged that the figures are likely to be higher than the £25,000 per dwelling sought in the councils current Affordable Housing Interim Planning Guidance <a href="https://www.mansfield.gov.uk/downloads/file/766/affordable-housing-ipg">https://www.mansfield.gov.uk/downloads/file/766/affordable-housing-ipg</a> However, the IPG came into effect on 1 April 2008. Therefore, it is important that the calculation used reflects the fact that the costs of providing affordable homes has changed in the intervening 12 years. If the figure stayed at a standard £25,000 per dwelling it would mean that there would be a shortfall and it would not be possible to deliver the affordable housing that is required.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued.	<p>We are aware of variations which other Councils use to calculate commuted sums, for example, using the increased residual site value generated by not providing on site affordable housing, or on the net cost of providing affordable housing – i.e. Land cost PLUS Build cost LESS the value of the affordable housing, or a rate per sq. m as a commuted sum calculated by reference to the floor area of market housing built. These methods rely on a site-by-site approach and although the principles of the methodology for calculation can be incorporated into S106 obligations, they cannot be readily applied to generate a “blanket” figure to cover the whole district, since fixing a commuted sum relies on individual site appraisals. Well-developed schemes may also be necessary before an analysis can be made and where this is the case, such methods could not be applied to such as outline applications. In some</p>	<p>It is acknowledged that other councils use different approaches to calculating their commuted sums. As noted above, following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued.	cases, commuted sums have been based on plot values only with an acceptance that Registered Providers will commit to build costs on such plots. It is not clear whether the Council has considered any other approaches that we feel might have some merit. We would commend a “re-think” at this stage.	
N/A	AHSPD/12	We disagree with the methodology set out by the Council and consider that it is incorrect. The Council should calculate financial contributions using the following calculation: The difference between the open market value (less profit, sales fees and CIL payment), less the affordable value. This net figure is effectively the cost of affordable housing to the developer. It is this figure that should be used when calculating the financial contribution required.	Noted – Following all the comments received, the proposed approach to calculating the commuted sum will be reviewed and amended.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/18	Pay all rent.	Not clear as to what is meant by this comment. However, if it is referring to what commuted sums should be used to fund, such contributions will pay for the delivery of off-site

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
			affordable housing.
N/A	AHSPD/19	No comments.	Noted.
<b>Q16 - Do you agree with how commuted sums will be spent? Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted.
N/A	AHSPD/10	No, we do not agree that the Council should purchase existing housing stock as that would remove market housing from existing stock and could increase prices to the detriment of those able to purchase their own homes.	The council consider that it is appropriate to retain the ability to use commuted sums for such uses should future programmes come in that seek to allow the return of empty private sector housing stock back into use.
N/A	AHSPD/13	Yes, agrees.	Noted
N/A	AHSPD/15	Yes, agrees.	Noted
N/A	AHSPD/18	No – Does not agree.	Noted
N/A	AHSPD/19	No – Does not agree. In order of preference I would prefer to see commuted sums spent on affordable housing to rent on council land/registered providers schemes; shared ownership for the elderly; purchasing to add to the stock. My rationale being the shortage in a diminishing social sector stock and the need to cater for an increasing elderly population.	Noted - In spending commuted sums, the council will consider the type of housing that is required. Full details on how the commuted sum will be spent will be contained in the Section 106 legal agreement relating to the specific development.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q17 - Do you agree with where financial contributions will be spent? Yes / No</b>			
N/A	AHSPD/7	Yes, agrees.	Noted
N/A	AHSPD/10	Broadly speaking yes, subject to the caveat that greater need may justify “out of area” spending.	Noted – The SPD has been amended to confirm that monies will be spent within the area that relates directly to the development. For these purposes, it is defined within the administrative boundary of the Mansfield District.
N/A	AHSPD/12	Yes, agrees.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	No – Does not agree. In order of preference I would prefer to see commuted sums spent on affordable housing to rent on council land/registered providers schemes; shared ownership for the elderly; purchasing to add to the stock. My rationale being the shortage in a diminishing social sector stock and the need to cater for an increasing elderly population.	Noted - In spending commuted sums, the council will consider the type of housing that is required. Full details on how the commuted sum will be spent will be contained in the Section 106 legal agreement relating to the specific development.
N/A	AHSPD/22	No – Does not agree.	Noted
<b>Q18 - Do you have any comments about the approach to spending commuted sums?</b>			
N/A	AHSPD/1	There should be an expectation reflected in the SPD that funds collected will be allocated within three years (at a maximum) to	The purpose of the commuted sums is to allow provision to be made off-site in cases where on-site provision is not possible. The Section 106 agreement relating to the planning application will set out:

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/1 continued.	provide affordable housing off-site. In line with the Scarborough Affordable Housing SPD (October 2019) "3.13 In exceptional circumstances a financial contribution may be accepted in lieu of on-site or off-site provision, the contribution will be paid into a ring-fenced Housing Enabling Fund ... Each year a monitoring statement will be produced and displayed on the Council's website detailing the monies collected and how the fund has been utilised."	<ul style="list-style-type: none"> <li>• the value of the commuted sum (that will be subject to indexation),</li> <li>• how the sum will be spent, and</li> <li>• the timeframe by when the contribution should be spent.</li> </ul>
N/A	AHSPD/7	Ensuring affordable housing is supported however being mindful that other private enterprises are not subsidised.	Noted but affordable housing is not regarded as a private enterprise.
N/A	AHSPD/12	We have reservations with some of the proposals put forward by the Council. We consider that the Council should not be purchasing homes and bringing them up to an appropriate standard. The Council and or RPs should use the monies for extensions/alterations / loft conversions to existing Council/ RP stock to support	Noted but not agreed – Monies secured by commuted by commuted sums will be used to deliver new provision not address issues with the existing housing stock.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		larger families so they don't have to move.	
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/22	Under 2.20 - The use of commuted sums should be more closely aligned to the needs of the immediate area of the development, spent subject to stringent time limits, subject to clawback provisions etc.	Agreed – Full details on how the monies will be spent will be contained in the Section 106 legal agreement.
<b>Q19 - Do you agree that the identified factors should be used when establishing whether or not to vary the affordable housing requirement? Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted.
N/A	AHSPD/9	No – Does not agree.	Noted.
N/A	AHSPD/10	No, we believe that viability assessment is adequately dealt with in the NPPF. We are concerned that the Council appear to be seeking to limit viability assessment to changes since the broad-brush local plan viability assessments.	The approach to viability in the draft SPD acknowledges the requirements of the NPPF. Where a scheme is shown to be unviable, the SPD notes that it may be appropriate to consider if measures are required to make the scheme viable. It then outlines the factors that need to be considered when determining if it is necessary to take steps to make schemes viable.
N/A	AHSPD/12	Yes, agrees.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q20 - Do you have any comments about the approach to accepting a different mix of affordable homes?</b>			
N/A	AHSPD/7	The tenure mix can affect viability significantly. Supporting a different mix of affordable homes should be considered as part of the planning process.	Noted – The tenure split in the table under paragraph 2.5 is generally the mix that will be sought. However, this is open to negotiation based on the individual case and housing need present at the time.
N/A	AHSPD/9	Yes - in continuation of our response to Question 19 above, the additional requirements set out at paragraph 2.25 are not consistent with the NPPF, PPG or emerging Local Plan and should be deleted. Whilst the weight to be afforded to a viability assessment is a matter of judgement for the decision-maker in the wider planning balance, the SPD should ensure it is consistent with national policy and the emerging Local Plan position which is clear that proposals which do not meet the affordable housing requirement set out in emerging Policy H4 will only be acceptable where it is satisfactorily demonstrated that a different level or mix of affordable housing is required to make the development viable and the	The issue of viability will cover other matters as well as affordable housing e.g. other planning obligations that may be sought to mitigate the impact of development. Where required, the wording in this paragraph will be reviewed and amended to ensure that a consistent approach to viability takes place.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued.	approach contributes towards creating mixed and balanced communities. Factors such as 5-year housing land supply and benefits of the proposals are important matters in the wider planning balance but should not form specific components of the viability considerations set out in the SPD. The additional requirements set out at paragraph 2.25 should be deleted in their entirety.	
N/A	AHSPD/10	See response to question 6	See MDC response to question 6
N/A	AHSPD/12	We agree to the Council's position of being open to accepting a different mix of affordable homes if evidence states so. However, consideration is also needed for tenure changes and/or reduction in affordable housing requirement in tandem with variations to the affordable housing mix.	Any changes to the tenure mix will be subject to negotiation. In terms of a reduction in the level of affordable housing to be provided, this will require detailed justification to demonstrate why this should occur. This could be addressed as part of any viability appraisal that may be submitted.
N/A	AHSPD/14	Think the council should build entire houses full of council houses,	Noted.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/19	No comments.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q21 – Do you agree with the approach to vary the mix of affordable homes before considering reducing the percentage of affordable homes required? Yes / No</b>			
N/A	AHSPD/10	No – Does not agree. – See response to question 6	Noted, see MDC response to question 6 comments.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q22 – Do you have any comments about the proposed approach when sites are demonstrated not to be viable?</b>			
N/A	AHSPD/1	We agree that there should be an independent review that would be paid for by the applicant. In line with the Scarborough Affordable Housing SPD, there should an explicit statement added to Mansfield’s SPD along the following lines: “In accordance with the NPPF all viability appraisals will now be made publicly available.”	Support for independent review by the applicant is welcomed. Regarding the use of the Scarborough approach, confidentiality issues would be generated etc. However could amend the SPD to say that other in exceptional circumstances, viability appraisals will be made publically available.
N/A	AHSPD/2	The applicant should pay for an independent review.	Para 2.4 already explains that the cost of this review will be met by the developer.
N/A	AHSPD/7	Para 2.27 is not justified or sound in its approach. The tiered approach is useful for introducing some flexibility, but realistically if the scheme cannot support affordable housing, then altering	Whether altering the housing mix makes a scheme viable will depend on the individual circumstances of the site. There may be occasions where this does occur. If so, and due to the reasons in paragraph 2.11 of the draft SPD, it is considered appropriate to accept a commuted sum when the number of affordable homes secured on site would fall

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		the mix first will likely not assist.	below five.
N/A	AHSPD/9	Yes – as set out in our response to Question 19 above, the inclusion of the additional considerations as per paragraph 2.25 are not consistent with the NPPF or NPPG and should therefore be removed from the SPD in their entirety.	As confirmed in response to the comments made under question 20, the issue of viability will cover other matters as well as affordable housing e.g. other planning obligations that may be sought to mitigate the impact of development. Where required, the wording in this paragraph will be reviewed and amended to ensure that a consistent approach to viability takes place.
N/A	AHSPD/10	Surely this is unnecessary and inappropriate? Where otherwise acceptable sites are rendered unviable, they should proceed if they can be rendered viable by reducing/removing the affordable requirement. That was the approach to some site allocations in the Local Plan. We are mindful that individual circumstances – costs – values – site difficulties etc. change with time and may not have been fully considered until application stage. If the costs of providing affordable housing renders a site unviable then the requirement should be varied or dropped to allow development to go ahead. This would help fulfil government policy to significantly	Where sites are shown to be unviable, consideration needs to be given to a whole range of factors not just to the level of affordable housing proposed / required. In cases where there are other planning obligations sought, it may be that they can be reduced to make the site viable without having to reduce the level of affordable housing provided. In some cases, this may come down to what the priorities are in terms of the level of affordable housing and other infrastructure needs being sought through planning obligations. All of this will have to be taken into account as part of the consideration of the planning application.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/10 continued.	boost housing supply. In any event, we note that the approach has questionable application to such as the reconsideration of an existing consent.	
N/A	AHSPD/12	In relation to paragraph 2.24 we request that the Council amend the wording of this to make it clear that the Council's expert will need to work very closely with the developer and their expert in order to come to appropriate options which can be tested and agreed upon by all parties. Furthermore, in testing viable options, other costs such as Section 106 contributions should be reviewed and reduced, and the timing of those cost should be pushed back to assist viability.	Noted – The issue of viability will cover matters others than just housing e.g. other planning obligations that may be sought. The council will seek to ensure that consistent approach is adopted when considering viability, including all the elements that need to be taken into account when undertaking viability assessments and their subsequent review by the councils selected, viability expert. The need for the council's viability expert to work with the developer to identify appropriate options to be tested is acknowledged.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/19	No comments.	Noted.
N/A	AHSPD/22	The principles of 2.21-2.24 are understood. Under 2.26, whilst the benchmark for viability may change during the plan period it would be helpful if there is a clearer protocol / more detail as to how viability of a site will be dealt	The issue of viability will cover matters others than just housing e.g. other planning obligations that may be sought. The council will seek to ensure that a consistent approach is adopted when considering viability, including all the elements that need to be taken into account when undertaking viability assessments and their subsequent review by the councils selected, viability expert.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/22 continued.	with in such circumstances. Will the Council accept a third party appraisal or solely VOA assessments? Under 2.26, it is possible that the adjustments under (1) will theoretically render a viable scheme but if it is not in line with market requirements then this will not result in a deliverable scheme. 2.26 should be (1) and /or (2) cross referencing 'deliverability' as well as viability.	
<b>Q23 - Do you agree with how it is proposed to calculate and apply the vacant building credit? Yes / No</b>			
N/A	AHSPD/10	This is adequately dealt with in the NPPF and it is unclear whether this needs to be set out in an SPD. We believe that the NPPF refers to giving “credit” for gross floor space that would include upper floors in multi – storey buildings whereas the SPD refers only to a building’s “footprint” - which on the usual definition would exclude upper floors.	The point regarding the use of the “footprint” to calculate the vacant building credit excluding upper floors is accepted. The reference to how the gross floor area will be calculated will be amended before the SPD is adopted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q24 - Do you have any comments about how to determine whether a building has been abandoned?</b>			
N/A	AHSPD/7	This should be in line with NPPG.	Noted.
N/A	AHSPD/10	This is adequately dealt with in the NPPF and it is unclear whether this needs to be set out in an SPD.	Whilst the NPPF confirms what the vacant building credit is and refers to “abandoned”, it does not go into the detail of how abandoned will be defined. The text in the SPD is intended to help provide clarity on this matter. As such, it is felt that it should be retained.
N/A	AHSPD/12	No comment.	Noted.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/18	When taxes stop being paid or safety of building	Noted – This may be something that could be used to help assess whether a building has been abandoned.
N/A	AHSPD/19	Yes - there needs to be robust investigation to establish whether an owner has genuinely tried to let or find an alternative use for a vacant building.	Noted – It is felt that this could be picked and addressed through some of the bullet points referred to in paragraph 2.31.
<b>Q25 – Do you have any comments about the vacant building credit?</b>			
N/A	AHSPD/7	The calculation is convoluted and a worked example should be included. The simplest approach is to subtract the total gross floor space that is to be redeveloped from the total sq. m that is proposed on the site. The average plot sq. m from the proposal will then determine the number of affordable plots. This should only	Agreed – The calculation will be simplified and an example included in the SPD before it is adopted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/7 continued.	apply for calculation of non-residential vacant buildings. If the buildings to be redeveloped were houses, then a simple like-for-like should be used. Notwithstanding the above, further justification is required to support the use of a '90 sq. m three bed' as a base for calculating how many homes. The most sought after affordable product is a 1 bed flat (smaller than 90 sq. m). This shows inconsistency within the document.	
N/A	AHSPD/12	No comment.	Noted.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/19	No comments.	Noted.
N/A	AHSPD/20	Build to Rent section Paragraph 2.38. It is not clear in this paragraph if the clawback is time limited or if the clawback is in perpetuity. The clawback should be maintained for the lifetime of a property and if demolished at some stage in the future then that contribution to Affordable Housing should be maintained.	Noted. The clawback period would be in perpetuity to ensure that the property remains as affordable housing. The wording of the SPD will be amended before it is adopted.



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q26 - Do you agree that 20% of Build to Rent schemes should be provided as affordable private rent? Yes / No</b>			
N/A	AHSPD/10	No, the affordable rent is affordable housing and the appropriate percentages should be as set out in the Local Plan at either 10% or 5% as appropriate to each of Zones 1 and 2.	The figures in the Local Plan are the proportion of development that will need to be affordable housing. The figure in the SPD relates to how the affordable housing would be split by tenure.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	No – Does not agree.	Noted.
N/A	AHSPD/18	No – Does not agree.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q27 - Do you agree with the use of median private monthly rents to establish the rental level for affordable private rent? Yes / No</b>			
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	No – Does not agree.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q28 - Do you agree with the approach to eligibility and the proposed level on income required? Yes / No</b>			
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	No – Does not agree. The figures shown are straight percentage calculations of rent against income. However, other housing costs like council tax and	Noted. – Acknowledge that there are other factors however; the costs for things such as house insurance, utility bills etc. will vary on a person-by-person basis. Therefore, the figure given is approximate, not definitive.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		insurance increase the cost to a tenant, so his/her housing cost will be more than 30%	
<b>Q29 - Do you have any comments about the approach to affordable housing on Build to Rent schemes?</b>			
N/A	AHSPD/12	No comment.	Noted.
N/A	AHSPD/14	They should all be owned by the council	Noted.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/18	Open build with spaces to park no flats.	Noted.
<b>Q30 – Do you agree with the proposed approach to design and layout for affordable housing? Yes / No</b>			
N/A	AHSPD/7	No – Does not agree.	Noted.
N/A	AHSPD/12	Yes, agrees.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	No – Does not agree.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	No – Does not agree.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q31 – Do you have any comments about the design and layout for affordable housing?</b>			
N/A	AHSPD/2	<p>Can we have decent roads with restrictions for non-resident parking please?</p> <p>Please consider that open-plan gardens are not ideal as they usually get damaged by non-residents who treat them as communal (and even drive their cars over lawns).</p>	<p>The implementation of such restrictions would be a matter for the highway authority (Nottinghamshire County Council) not the district council.</p> <p>This is a detailed design point that cannot be addressed as part of the SPD. It would be assessed on a case-by-case basis when an application is submitted.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/2 continued	<p>Parking concerns (you may wish to feed this into the emerging Parking Standard SPD?) – all developments should consider whether they are adding to the school run problems, emissions and causing access issues on narrow roads.</p> <p>Strive for off-road parking please. It aids Crime Prevention where off-road parking is available. I am certain the Police, Emergency Services and Bin Men will support this point.</p>	<p>The impacts on the highway network will be assessed (including within the Transport Assessment/ transport Statement provided by the applicant where one is required) as part of the planning application. As the highway authority, the county council will provide its observations on these matters. Matters relating to vehicle emissions would be subject to comments from the council's Environmental Health department.</p> <p>Policy IN10 of the emerging Local Plan addresses the issue of car parking and the highway authority would provide any comments on the suitability of this as part of its comments on the planning application. In addition, the county council have guidance on car parking provision that is available on its website.</p>
N/A	AHSPD/7	Grouping of affordable housing is preferred by housing associations. Consideration on a site-by-site basis should be given.	Noted
N/A	AHSPD/12	The design and layout of affordable housing should be considered on a site-by-site basis and not determined at a detailed level through a SPD.	The purpose of this to set out the council's approach to ensuring mixed and balanced communities rather than having areas of specific types of housing in one area. It is acknowledged that layouts will have to consider the specifics of individual sites.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/19	YES - It may be seen as contradictory to say that affordable housing should be provided throughout a	Noted – The key thing is that the last sentence of paragraph 2.41 states that <i>small</i> clusters may be acceptable.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/19 continued.	development whilst in the same paragraph saying that small groups of affordable homes will be accepted. Developers tend to avoid affordable housing on sites if they can; if they can't, they prefer to cluster them away at one end of a development, especially if they are for rent.	
<b>Q32 - Do you agree that, while not a requirement, the Nationally Described Space Standards are best practice and should be supported? Yes / No</b>			
Notts CPRE	AHSPD/8	Yes, agrees.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q33 – Do you have any comments about the approach to space standards?</b>			
N/A	AHSPD/1	Does MDC undertake to address this omission (re: lack of space standards) at the nearest opportunity, e.g. the next review of the Local Plan? If so, this intention should be set out in the SPD.	The draft wording is clear that this is not a requirement (and cannot be a requirement, as it did not come forward as a policy through the Local Plan). The wording simply clarifies that if these standards are met this would be supported by the Council.
N/A	AHSPD/7	Space Standards should be adopted as part of the Local Plan approach. They affect the viability of the schemes by increasing	The draft wording is clear that this is not a requirement (and cannot be a requirement, as it did not come forward as a policy through the Local Plan). The wording simply clarifies that if these standards are met this would be supported by

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		build costs disproportionately to revenue and should therefore be examined as part of housing allocation deliverability.	the Council.
Notts CPRE	AHSPD/8	Having enough living space is part of decent quality of life, but it is so often not achieved in the UK. As the Campaign to Protect Rural England has highlighted, the UK has the smallest residential accommodation in Europe. Minimum space standards should be incorporated into national planning guidance rather than just recommended as 'best practice'. However, in the absence of national government leadership on this issue, we commend Mansfield for moving as far as they are able to in the right direction.	Noted.
N/A	AHSPD/9	Yes – The use of Space Standards can be supported if a development complies with them however if the Council wish to formally take the Nationally Described Space Standards (NDSS) into account in the decision-making process, then	The draft wording is clear that this is not a requirement (and cannot be a requirement, as it did not come forward as a policy through the Local Plan). The wording simply clarifies that if these standards are met this would be supported by the Council.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/9 continued.	<p>they must be adopted through the Local Plan process in accordance with the NPPF (paragraph 127(f) footnote 46). They cannot be incorporated into the decision-making process through the adoption of this SPD and therefore future applications that do not comply with standards cannot be refused on this basis. Whilst the SPD goes some way to clarifying this at paragraphs 2.42 and 2.44, we consider the inclusion of reference to the Space Standards within the SPD to be confusing and unnecessary, as they cannot be relied upon in the decision-making process. We therefore recommend that the Council remove reference to the NDSS from the Affordable Housing SPD.</p>	
N/A	AHSPD/12	<p>The last sentence of paragraph 2.44 should be removed, as it is adding weight to a space standard that has not been tested.</p>	<p>The draft wording is clear that this is not a requirement (and cannot be a requirement, as it did not come forward as a policy through the Local Plan). The wording simply clarifies that if these standards are met this would be supported by the Council.</p>
N/A	AHSPD/15	No comments.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AHSPD/19	NO, other than that the space standards are already low and there is no logic at all in less space being required for one storey as opposed to 2 storey dwellings. There is also little justification for a “1 person/1 bed” dwelling being a mere 39sqm as opposed to a “2 person/1 bed” dwelling of 50 sq. m because there is nothing to prevent a 1 person dwelling being occupied by 2 people.	The standards set out in the table under paragraph 2.43 are the national standards, not ones that have been developed by the district council.
<b>Q34 - Do you agree that use of the Adaptability Standards should be supported? Yes / No</b>			
N/A	AHSPD/9	Yes, agrees	Noted
N/A	AHSPD/14	Yes, agrees.	Noted
N/A	AHSPD/15	Yes, agrees.	Noted
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, agrees. Adaptability standards need to be supported. Such properties can be used by able bodied and disabled people alike.	Noted.
<b>Q35 - Do you agree with the proposal to require affordable housing on elderly accommodation schemes that fall within use class C3 on the same basis as other schemes? Yes / No</b>			
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AHSPD/19	Yes, agrees.	Noted.
<b>Q36 - Do you agree with the proposed split between social rent, affordable rent and intermediate affordable housing for elderly affordable housing? Yes / No</b>			
N/A	AHSPD/10	See earlier comments on “split” of affordable housing which are equally applicable to accommodation for the elderly.	Noted.
N/A	AHSPD/13	Yes, agrees.	Noted.
N/A	AHSPD/14	Yes, agrees.	Noted.
N/A	AHSPD/15	Yes, agrees.	Noted.
N/A	AHSPD/18	Yes, agrees.	Noted.
N/A	AHSPD/19	Yes, agrees. Aside from rental properties, shared ownership has become very popular with retirees.	Noted.
<b>Q37 - Do you have any comments about the overall approach to elderly accommodation?</b>			
N/A	AHSPD/1	As the result of MM37 reference to 'the elderly' has been removed from Policy H6 (1) (b) and replaced with 'people with care needs'. As such, Paragraph 2.46 of the SPD will need to be updated.	Accept need for change: Para. 2.46 to be updated to refer to 'people with care needs'.
N/A	AHSPD/2	Building new housing for the elderly/disabled is a good approach, especially where there are residents with specific needs. However, existing properties also need to be kept maintained to a	Noted but not relevant to Affordable Housing SPD.



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/2 continued.	<p>good standard.</p> <p>While I accept that bungalows have a larger footprint than houses, not all of the elderly/disabled can climb stairs easily (if at all). If alternatives to bungalows are to be the norm, will appropriate equipment be installed in these buildings (EG lifts, stair lifts, etc.)?</p> <p>Taking into consideration what is currently happening with Covid-19. For all elderly &amp; disabled residents - measures to be put in place so residents have contact with appropriate service (EG Police, EG Carer, EG Neighbourhood Watch, EG MDC, etc.), especially when a large amount of residents may not have the internet or smart phones.</p>	<p>The SPD does not prejudice the delivery of bungalows. The provision of additional equipment to allow people to live in their home is their responsibility. However, there may be grants or other assistance available to help aid this provision.</p> <p>The making of such arrangements is outside of the scope of this SPD.</p>
N/A	AHSPD/7	It is unclear whether the requirements put forward in this section is to apply to all C3 developments proposed in the borough or specific to elderly accommodation. This needs to be	Noted. This would apply to all C3 developments, however see point below.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AHSPD/7 continued.	<p>clarified. Accessibility of housing is secured under Building Regulations and is not a matter for planning policy to control. This allows for quicker adaptation and updates to ensure new homes are built to a specific standard.</p> <p>Any further standards introduced through planning need to be considered in the round as part of the Local Plan examination process, not in a SPD.</p>	<p>In terms of provision of affordable housing for elderly accommodation, this point is accepted and would need to be done via the Local Plan process.</p>
N/A	AHSPD/9	<p>Yes, as with our response to question 33 above, the standards can be supported if a development complies with them however, if the Council wish to formally take them into account in the decision-making process, they must be adopted through the Local Plan Process and cannot be incorporated into the decision-making process through the adoption of this SPD. As per our response to question 33 above, we consider reference to these standards within this SPD to be confusing and unnecessary and</p>	<p>In terms of provision of affordable housing for elderly accommodation, this point is accepted and would need to be done via the Local Plan process.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		therefore recommend such references are removed.	
N/A	AHSPD/12	No comment.	Noted.
N/A	AHSPD/15	No comments.	Noted.
N/A	AHSPD/18	Not put in same areas as youth or trouble areas	Noted – The council will seek to ensure that new housing is located in the most appropriate areas that also have good access to goods and services required.
N/A	AHSPD/19	Q37 - Yes - with an increasing elderly population, any development that caters specifically for them also frees up homes elsewhere in the district	Noted.

**Table 6 – Responses - 9 January – 20 February 2023 Consultation**

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q1a - Do you agree with the topics proposed to be covered in the SPD as set out in paragraph 2.1?</b>			
N/A	AH/1	Yes, agrees.	Noted.
<b>Q1b - Reason</b>			
No responses were received on this question – No further action required.			
<b>Q2a - Are there any other matters that you think should be covered in the SPD?</b>			
N/A	AH/12	Yes	Noted.
<b>Q2b - If yes, please state what should be covered and the reason(s) why</b>			
N/A	AH/12	Considers that numbers of affordable homes should be rounded down instead of up to	The concern about viability is noted however, if developers consider this to be an issue it can be addressed via the approach set out in paragraphs 2.38 – 2.48 of the draft SPD

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/12 continued.	have least impact on viability. Also suggests that Table 1 is recast to provide whole numbers.	<p>(now paragraphs 2.35 - 2.45) and 3.28 – 3.39 (which includes review and clawback mechanisms) of the council’s adopted Planning Obligations SPD that can be viewed at <a href="https://www.mansfield.gov.uk/spd">https://www.mansfield.gov.uk/spd</a></p> <p>In our experience, it is common practice to round up the affordable units, rather than round down.</p> <p>Regarding table 1, the only way to create whole numbers in the main body of the table would be to amend the overall split between First Homes and Social Rent / other tenures. Based on the findings of the “Housing Affordability In the Context of First Homes” document (paragraph 3.26) that was prepared to support the production of the SPD (<a href="https://mansfield-consult.objective.co.uk/kse/event/37241">https://mansfield-consult.objective.co.uk/kse/event/37241</a>), there is no evidence to support providing more than the minimum requirement (25%) of affordable housing units as First Homes.</p>
<b>Q3a - Do you agree with the proposed split between First Homes, social rent, affordable rent and intermediate as set out in table 1 within paragraph 2.8 of the Draft SPD?</b>			
N/A	AH/1	No – Does not agree.	Noted.
N/A	AH/13	No – Does not agree.	Noted.
N/A	AH/14	No – Does not agree.	Noted.
<b>Q3b - Reason(s)</b>			
N/A	AH/1	Does not agree with the proposed split. Considers that Table 1 does not comply with the Framework as Zone 1 Greenfield and Zone 2 Brownfield should be	The tenure mix has already been tested in April 22 within "First Homes and the impact on Local Plan Viability" review undertaken by CP Viability. The rationale behind this mix is clearly explained in paragraphs 2.2 to 2.8 of the Affordable Housing SPD consultation.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/1 continued.	obligated to deliver 100% First Homes i.e. 10% Affordable Home Ownership product, rather than there being a discretionary process of negotiation as proposed.	<p>The NPPF confirms, “planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership” unless a number of criteria apply. The total affordable housing figures for Brownfield and Greenfield for Zones 1 and 2 set out in table 1 are based on the requirements of policy H4 of the Local Plan. This has been subject to independent examination and has been found sound.</p> <p>With the exception of Zone 1, Brownfield whereby it will make 100% of the provision, First Homes and thereby affordable home ownership will make up 25% of the affordable housing requirements that will be sought by the council. For example, greenfield zone 1 seeks 10% affordable homes. Of this, 2.5% (or a quarter of it) will be First Homes.</p> <p>It is therefore considered that the national requirements are met.</p>
N/A	AH/11	<p>Considers that the use of zones based on average house prices in the Local Plan is clear. However notes that while the proportion of affordable housing in the SPD is the same as in the Local Plan, this is only split into First Homes and social rent. There is no clarification of the percentage of affordable rent or intermediate.</p>	<p>As set out in paragraph 2.6 of the draft SPD, the tenure split in table 1 is based on the requirements of Local Plan H4 and the introduction of First Homes (hence the reason for the change in tenure split when compared to the original SPD that was consulted on in 2020). It is also based on the guidance in the additional viability evidence work that was undertaken to inform the content of this SPD (First Homes and the impact on Local Plan viability) that can be viewed at <a href="https://mansfield-consult.objective.co.uk/kse/event/37241">https://mansfield-consult.objective.co.uk/kse/event/37241</a>. For clarity, a link to this work has been added to paragraph 2.6.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/11 continued.	<p>Suggests the detail in Table 1 is removed and the type and tenure of affordable housing is stated as guidance, to be determined with regard to the district's needs.</p> <p>States that clarification is needed regarding negotiation on individual cases, as a range of factors could be determined this way.</p>	<p>As table 1 confirms, the councils starting point will be for affordable housing tenure to be made up of First Homes and Social Rent. Whilst percentages are not provided for Affordable Rent and Intermediate Housing, this does not mean that the council will not accept such tenures. As set out in paragraph 2.8 of the draft SPD <i>“Whilst this will generally be the mix sought by the district council, this is open for negotiation based on the individual case and housing need present at the time.”</i></p> <p>It is important that guidance be given regarding the tenure mix that will be sought. Therefore, it is considered appropriate to retain table1. No additional text required. As noted above, paragraph 2.8 already states that <i>“Whilst this will generally be the mix sought by the district council, this is open for negotiation based on the individual case and housing need present at the time.”</i></p> <p>Noted – It is acknowledged that there are a range of factors that can affect the ability to make policy compliant provision. It is not considered necessary to list all the different types of occasion / circumstances where negotiation on the tenure mix will take place.</p>
N/A	AH/12	Considers that the split proposed would establish new policy, which should be tested at local plan review. Considers that Table 1 does not reflect government policy for First	The NPPF confirms, “planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership” unless a number of criteria apply. The total affordable housing figures for Brownfield and Greenfield for Zones 1 and 2 set out in table 1 are based on the requirements of policy H4 of the Local Plan.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/12 continued.	Homes to make up 10% of the houses proposed (provided that would not exceed Affordable Homes required), and at least 25% of the required affordable homes.	<p>This has been subject to independent examination and has been found sound.</p> <p>With the exception of Zone 1, Brownfield whereby it will make 100% of the provision, First Homes and thereby affordable home ownership will make up 25% of the affordable housing requirements that will be sought by the council. For example greenfield zone of the 10% affordable homes, 2.5% or a quarter of this 10% will be First Homes. It is therefore considered that the national requirements are met.</p> <p>The tenure mix has already been tested in April 22 within "First Homes and the impact on Local Plan Viability" review undertaken by CP Viability. The rationale behind this mix is clearly explained in paragraphs 2.2 to 2.8 of the Affordable Housing SPD consultation. Following comments received as part of the consultation, further viability work was undertaken in April / May 2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results show current viability outcomes remain generally positive and broadly in keeping with what has been identified in the past. Where viability challenges are identified, the Council's existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p>
N/A	AH/13	Considers that the evidence underpinning the tenure split is not robust and should be reviewed (as set out in section 3	AH/13 Submit an accompanying report (dated Feb 23) as a response to the consultation. Section 3 specifically considers the viability assessment undertaken by CP Viability in 2022 and raises a number of challenges. Taking each in turn (and

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/13 continued.	of the attached report). States that this may have implications for the overall level of affordable housing and is a matter for local plan review.	<p>using AH/14's paragraph numbers for ease):</p> <p>Para 3.5 - <i>CPV's assessment is a selective review.</i> This is a misleading statement. As set out in para 2.1.2 CPV's 2022 review, where possible the same assumptions were applied to the modelling to reflect (a) the viability testing that had been through an examination process and had been accepted and (b) to ensure that a 'like for like' comparison could be made between the different studies to see how market conditions now compared to the conditions leading up to the examination. This is not therefore selective.</p> <p>Para 3.5 - <i>There is no clear justification provided as to why other assumptions were not updated.</i> As indicated above the rationale for the approach is set out in para 2.1.2 of CPV's Apr 22 assessment.</p> <p>Para 3.5 - <i>There is no reference to the updated guidance.</i> The purpose of the exercise was to provide a succinct review. It was not deemed necessary to include sections within the report to explain the latest guidance. However, to confirm, CP Viability have confirmed that the exercise undertaken was as per the requirements of the Planning Practice Guidance: Viability and RICS Viability guidance (2021).</p> <p>Para 3.6 - <i>CPV's report does not include the outputs from the development appraisals.</i> The outputs of the appraisals are shown in Section 3 of CPV's April 2022 report (there are 6 tables in total detailing the outputs).</p>



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/13 continued.		<p>Para 3.7 - <i>CPV's testing assumes a cap of £130,000 per First Home on the assumption that most First Homes will be small - this may lead to over provision or under provision of smaller units.</i> To clarify, the viability testing allows for First Homes to be a mix of dwelling sizes. However, it does follow the JG Consulting advice that the value should be capped at no more than £130,000 (even if, for example, a 4-bed dwelling is being provided as a First Home).</p> <p>Para 3.8 - <i>All 3 viability studies fail to take into account sensitivity testing.</i> In terms of the guidance, the Planning Practice Guidance: Viability makes no reference to the need to undertake sensitivity testing for Local Plan modelling. However, it is acknowledged that the RICS guidance does refer to this. Further viability work was undertaken in April / May 2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results current viability outcomes remain generally positive and broadly in keeping with what has been identified in the past. Where viability challenges are identified, the Council's existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p> <p>Para 3.9 - <i>Finance costs and build out rates fluctuate, however this is not reflected in the testing.</i> Any Local Plan viability assessment is based at a specific point in time. In this regard, CPV's Apr 22 testing was based on assumptions around finance costs at that point in time. Local Plan viability</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/13 continued.		<p>testing (nor any viability testing) cannot predict future fluctuations in market conditions. It is not therefore possible to accurately gauge how future markets will change. This limitation is recognized in the guidance however, it does not undermine the process. It is precisely for this reason why it is still deemed necessary to have site-specific viability assessments, if market conditions are subject to a significant change in the future.</p> <p>Paras 3.11 &amp; 3.12 - <i>There have been changes in build costs since Apr 22 which need to be factored into the testing, including recent changes to Part L of the Building Regulations.</i> It is accepted that since Apr 22 there has been changes in terms of build cost inflation, sales price inflation (albeit cooling in recent months) and also the introduction of changes to Part L &amp; F of the Building Regulations. Further testing has been done to reflect these changes.</p> <p>Paras 3.13 to 3.15 - <i>Some of the inputs that have been retained from the original 2018 testing are not appropriate in today's market, for example the assumptions relating to electric vehicle charging points.</i> CP Viability have confirmed that in their experience (which includes testing viability of individual planning applications for around 40 different Local Authorities across the country, as well as Local Plan testing) the allowances retained from 2018 for contingency, professional fees, marketing, benchmark land values, legals and profit are all reasonable in the current market. As noted above, further viability work was undertaken in April / May</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/13 continued.		<p>2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results show current viability outcomes remain generally positive and broadly in keeping with what has been identified in the past. Where viability challenges are identified, the Council’s existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p> <p><i>Paras 3.16 to 3.22 - The allowances for S106 contributions have been carried over from 2018 and are now outdated and miss out other cost requirements. Biodiversity Net Gain also needs to be applied.</i> Not all planning policies will affect every site; therefore adopting the full suite of potential planning obligations is very much a worst-case scenario, which may provide an unrealistic viability outcome. Notwithstanding this, the allowances adopted were deemed to be reasonable in light of the Council's typical policy asks on sites across the District. As noted above, further viability work was undertaken in April / May 2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results current viability outcomes remain generally positive and broadly in keeping with what has been identified in the past. Where viability challenges are identified, the Council’s existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/13 continued.	<p>Supports the approach in paragraph 2.8 for alternative forms of provision to be agreed where evidenced, in order that the actual affordable need is met. However, it is recommended that the balance of non-First Home tenures should be reviewed as this is currently heavily skewed towards social rent. Considers that the figures in Table 1 give a misleading impression of the overall need in the district. Recommends that the reason for 75% social rent is clearly set out and it is emphasised that other tenures can also be viably provided if there is a need. Or, current needs data is applied to Table 1.</p>	<p>The approach to the tenure split was based on advice given in paragraph 4.4 of the “First Homes and the impact on Local Plan viability” report that was prepared to inform the production of the Draft SPD and that can be viewed at <a href="https://mansfield-consult.objective.co.uk/kse/event/37241">https://mansfield-consult.objective.co.uk/kse/event/37241</a>. In addition, paragraph 2.8 of the draft SPD confirms that “ <i>Whilst this will generally be the mix sought by the district council, this is open for negotiation based on the individual case and housing need present at the time.</i>”</p>
N/A	AH/14	<p>Considers that the evidence underpinning the tenure split is not robust and should be reviewed (as set out in section 3 of the attached report). States that this may have implications for the overall level of affordable housing and is</p>	<p>AH/14 Submit an accompanying report (dated Feb 23) as a response to the consultation. Section 3 specifically considers the viability assessment undertaken by CP Viability in 2022 and raises a number of challenges. Taking each in turn (and using AH/14's paragraph numbers for ease):</p> <p>Para 3.5 - <i>CPV's assessment is a selective review. This is a misleading statement. As set out in para 2.1.2 CPV's 2022</i></p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/14 continued.	a matter for local plan review.	<p>review, where possible the same assumptions were applied to the modelling to reflect (a) the viability testing that had been through an examination process and had been accepted and (b) to ensure that a 'like for like' comparison could be made between the different studies to see how market conditions now compared to the conditions leading up to the examination. This is not therefore selective.</p> <p>Para 3.5 - <i>There is no clear justification provided as to why other assumptions were not updated.</i> As indicated above the rationale for the approach is set out in para 2.1.2 of CPV's Apr 22 assessment.</p> <p>Para 3.5 - <i>There is no reference to the updated guidance.</i> The purpose of the exercise was to provide a succinct review. It was not deemed necessary to include sections within the report to explain the latest guidance. However, to confirm, CP Viability have confirmed that the exercise undertaken was as per the requirements of the Planning Practice Guidance: Viability and RICS Viability guidance (2021).</p> <p>Para 3.6 - <i>CPV's report does not include the outputs from the development appraisals.</i> The outputs of the appraisals are shown in Section 3 of CPV's April 2022 report (there are 6 tables in total detailing the outputs).</p> <p>Para 3.7 - <i>CPV's testing assumes a cap of £130,000 per First Home on the assumption that most First Homes will be small - this may lead to over provision or under provision of smaller units.</i> To clarify, the viability testing allows for First Homes to</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/14 continued.		<p>be a mix of dwelling sizes. However, it does follow the JG Consulting advice that the value should be capped at no more than £130,000 (even if, for example, a 4-bed dwelling is being provided as a First Home).</p> <p>Para 3.8 - <i>All 3 viability studies fail to take into account sensitivity testing.</i> In terms of the guidance, the Planning Practice Guidance: Viability makes no reference to the need to undertake sensitivity testing for Local Plan modelling. However, it is acknowledged that the RICS guidance does refer to this. Further viability work was undertaken in April / May 2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results current viability outcomes remain generally positive and broadly in keeping with what has been identified in the past. Where viability challenges are identified, the Council's existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p> <p>Para 3.9 - <i>Finance costs and build out rates fluctuate, however this is not reflected in the testing.</i> Any Local Plan viability assessment is based at a specific point in time. In this regard, CPV's Apr 22 testing was based on assumptions around finance costs at that point in time. Local Plan viability testing (nor any viability testing) cannot predict future fluctuations in market conditions. It is not therefore possible to accurately gauge how future markets will change. This limitation is recognized in the guidance however, it does not</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/14 continued.		<p>undermine the process. It is precisely for this reason why it is still deemed necessary to have site-specific viability assessments, if market conditions are subject to a significant change in the future.</p> <p>Paras 3.11 &amp; 3.12 - <i>There have been changes in build costs since Apr 22 which need to be factored into the testing, including recent changes to Part L of the Building Regulations.</i> It is accepted that since Apr 22 there has been changes in terms of build cost inflation, sales price inflation (albeit cooling in recent months) and also the introduction of changes to Part L &amp; F of the Building Regulations. Further testing has been done to reflect these changes.</p> <p>Paras 3.13 to 3.15 - <i>Some of the inputs that have been retained from the original 2018 testing are not appropriate in today's market, for example the assumptions relating to electric vehicle charging points.</i> CP Viability have confirmed that in their experience (which includes testing viability of individual planning applications for around 40 different Local Authorities across the country, as well as Local Plan testing) the allowances retained from 2018 for contingency, professional fees, marketing, benchmark land values, legals and profit are all reasonable in the current market. As stated above, further viability work was undertaken in April / May 2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results show current viability outcomes remain generally positive and broadly in keeping</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/14 continued.	<p>Supports the approach in paragraph 2.8 for alternative forms of provision to be agreed where evidenced, in order that the actual affordable need is</p>	<p>with what has been identified in the past. Where viability challenges are identified, the Council’s existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p> <p>Paras 3.16 to 3.22 - <i>The allowances for S106 contributions have been carried over from 2018 and are now outdated and miss out other cost requirements. Biodiversity Net Gain also needs to be applied.</i> Not all planning policies will affect every site; therefore adopting the full suite of potential planning obligations is very much a worst-case scenario, which may provide an unrealistic viability outcome. Notwithstanding this, the allowances adopted were deemed to be reasonable in light of the Council's typical policy asks on sites across the District. As stated above, further viability work was undertaken in April / May 2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results current viability outcomes remain generally positive and broadly in keeping with what has been identified in the past. Where viability challenges are identified, the Council’s existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p> <p>The approach to the tenure split was based on advice given in paragraph 4.4 of the “First Homes and the impact on Local Plan viability” report that was prepared to inform the production of the Draft SPD and that can be viewed at <a href="https://mansfield-consult.objective.co.uk/kse/event/37241">https://mansfield-consult.objective.co.uk/kse/event/37241</a>. In</p>



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/14 continued.	met. However, it is recommended that the balance of non-First Home tenures should be reviewed as this is currently heavily skewed towards social rent. Considers that the figures in Table 1 give a misleading impression of the overall need in the district. Recommends that the reason for 75% social rent is clearly set out and it is emphasised that other tenures can also be viably provided if there is a need. Or, current needs data is applied to Table 1.	In addition, paragraph 2.8 of the draft SPD confirms that “ <i>Whilst this will generally be the mix sought by the district council, this is open for negotiation based on the individual case and housing need present at the time.</i> ”
<b>Q4a - Do you agree with the proposed starting point for the size of affordable homes required on-site as set out in table 2 within paragraph 2.10 of the Draft SPD?</b>			
N/A	AH/1	No – Does not agree.	Noted.
N/A	AH/11	No – Does not agree.	Noted.
<b>Q4b - Reason(s)</b>			
N/A	AH/1	Does not agree with the starting point for the size of affordable homes. Considers the evidence base is out of date and should be updated.	Table 2 in the draft SPD is taken from table 5.4 of the adopted Local Plan. The evidence base for this is the most up to date available at the time the draft SPD was produced. The housing evidence base will be updated as part of the Local Plan review that will commence in 2023. This will provide opportunity to update the figures within the SPD as may be required.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AH/11	<p>Concerned that the proposed starting point (Housing Needs of Particular Groups 2018) has a lack of clarity regarding the proportions of First Homes and social rent (re Table 1) and that the proposed requirements for size and type of affordable homes creates unnecessary pressure and complexity for developers.</p> <p>Suggests that the proposed starting point is reconsidered, with more emphasis on it being a starting point for discussions with officers, rather than a set / required rate.</p>	<p>The Housing Needs of Particular Groups Study 2018 does not contain anything on First Homes, as these had not been introduced at the time the document was written hence the lack of reference to them in the study.</p> <p>The information about requirements for the type and size of affordable housing is not intended to put pressure on developers rather it is there to provide clarity on what the council's expectations are in terms of affordable housing provision. As confirmed below, these are a starting point for negotiations and will be considered on a case-by-case basis.</p> <p>In terms of Table 1, paragraph 2.8 clearly says that the mix is open for negotiation based on the individual case and housing need at the time.</p> <p>Table 2 is from the adopted Local Plan and has therefore been subject to independent examination. It is therefore considered that this should remain within the SPD. Paragraph 2.10 states that the figures in table 2 are a starting point for negotiations whilst paragraph 2.11 confirms that the figures in table 2 are district-wide and final decisions will be on a case-by-case basis. Therefore, amendments to the text to provide further clarity are not considered to be required.</p>
<b>Q5a - In addition to those set out in paragraph 2.11 of the Draft SPD, are there any other factors that you think should be taken into account when making the final decision on the size of dwellings?</b>			
N/A	AH/1	Yes, agrees.	Noted.
N/A	AH/11	Yes, agrees.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q5b - If yes, please state what should be taken into account and the reason(s) why</b>			
N/A	AH/1	<p>Considers that the following should be factored into the decision over dwelling size: pressure from emerging planning cost (s106 obligation, biodiversity net gain land take and 30 year management maintenance); building regulation changes in relation to Future Homes; design standards (elevation treatments); and reduction of plotting densities due to the Nottinghamshire Parking Standards.</p>	<p>Accepted – Other factors added. Paragraph 2.11 amended to confirm that this list is not exhaustive.</p>
N/A	AH/11	<p>Supports the factors used.</p> <p>Also suggests: use of the existing mix of dwelling sizes on site to inform the mix of sizes of affordable housing - rather than a district starting point; and use of viability where the council's desired mix would be unviable for the developer - altering the mix to enable some affordable housing to still be achieved.</p>	<p>Noted.</p> <p>This would be addressed via criteria 1 of paragraph 2.11. In terms of viability, a bullet point has been added to confirm that this will be a consideration.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q6a - Do you agree with the approach that the district council will take to providing the detail on how First Homes will be implemented within the district as set out in paragraphs 2.17 through to 2.19 of the Draft SPD?</b>			
N/A	AH/1	No – Does not agree.	Noted.
N/A	AH/11	No – Does not agree.	Noted.
<b>Q6b - Reason(s)</b>			
N/A	AH/1	Does not agree with the approach to First Homes. Considers that there is not enough detail, particularly in relation to the ceiling values at which they can be sold. States that MDC should commission supporting studies in order to provide this detail in a revised SPD and re-consult.	<p>The section on the council approach to First Homes is not intended to provide the detail. The SPD confirms that, as this is new policy the detail on First Homes will be provided as part of the Local Plan review (paragraph 2.19). The SPD does set out how First Homes will be provided as part of affordable housing mix that the council will seek to secure and this is set out in Table 1 of the Draft SPD.</p> <p>In terms of the evidence to support any potential local criteria that would be included in the Local Plan, this is set out in the “Housing Affordability in the Context of First Homes” document that was prepared to support the production of the SPD (<a href="https://mansfield-consult.objective.co.uk/kse/event/37241">https://mansfield-consult.objective.co.uk/kse/event/37241</a>). The council will seek to ensure that all the evidence used to prepare the Local Plan is as up to date as possible.</p>
N/A	AH/11	<p>Supports the non-implementation of local criteria as it ensures consistency with national guidance.</p> <p>Does not agree that local criteria should be addressed in the local plan review as this could end up</p>	<p>The council are yet to determine if local criteria will be implemented. This will be addressed and decided as part of the Local Plan review.</p> <p>The government brought in First Homes after the current Local Plan was adopted. The SPD cannot set out the detail on local criteria, as this would be new policy (not allowed).</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/11 continued.	<p>being more onerous than national policy and stifle development.</p> <p>Considers that having reference to an identified need will ensure that First Homes come forward only where there is a need, with other more suitable housing provided in its place if there is no need.</p> <p>Additionally, there is no mention of First Homes in the Local Plan (as introduced after its adoption) and new policy cannot be introduced by SPD. Recommends that references to local criteria and suggestions of what that might be is removed from the SPD. Considers inclusion of local criteria would place undue pressure on development. Recommends paragraphs 2.16 and 2.19 are removed.</p>	<p>Therefore, it is considered that the best place to provide detail on any local criteria would be through the Local Plan review that will commence in 2023.</p> <p>Noted – However, the provision of 25% of affordable housing as First Homes is a national requirement, it is not based on an assessment of local need (although councils can look to provide more than 25% if a need is identified).</p> <p>As stated above, it is acknowledged that the First Homes were introduced after the adoption of the Local Plan however authorities are still required to implement the government’s policy on First Homes. This section of the SPD purely acknowledges that First Homes have been introduced, the national standards and how the council will approach the issue. The SPD does set out how First Homes will be provided as part of affordable housing mix that the council will seek to secure and this is set out in Table 1 of the Draft SPD. However, this is not seen as introducing new policy as this is not allowed through SPDs.</p> <p>The issue of local criteria will be examined as part of the Local Plan review. In terms of paragraphs 2.16 and 2.19, these are providing information therefore; it is proposed that these be retained.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q7a - Do you agree with the proposed approach to calculating commuted sums for affordable housing as set out in paragraphs 2.27 through to 2.32 of the Draft SPD?</b>			
N/A	AH/11	No – Does not agree.	Noted.
N/A	AH/12	No – Does not agree.	Noted.
N/A	AH/13	No – Does not agree.	Noted.
N/A	AH/14	No – Does not agree.	Noted.
<b>Q7b - Reason(s)</b>			
N/A	AH/11	<p>Supports commuted sums as an alternative to on-site provision and the two instances whereby the council would consider this acceptable.</p> <p>Suggests reference is made to it being considered on a case-by-case basis.</p> <p>However does not support the calculation approach outlined in paragraphs 2.27- 2.28 as the</p>	<p>Noted – It is noted that there are actually multiple instances where commuted sums may be acceptable. These are set out in paragraphs 2.21 and 2.22 of the draft SPD. To avoid confusion, paragraph 2.22 has been deleted and the two instances of where commuted sums may be acceptable has been added to the list at paragraph 2.21. These have also been amended to reflect the circumstances that are set out within part 4 of policy H4 and not the supporting text (paragraph 5.38).</p> <p>It is not a simple case of there being an option for the developer to make on-site provision or pay a commuted sum for off-site provision. The council’s approach is that affordable housing will be provided on-site unless certain circumstances apply that would mean that provision of commuted sums would be acceptable. These circumstances are set in criteria 4 of policy H4 of the Local Plan and within the SPD.</p> <p>The council have considered a number of formula that were suggested in the” Affordable Housing Supplementary Planning Document (SPD) – Response to consultation</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/11 continued.	<p>detail of the discounted methodology is not discussed and no evidence is presented to consider in order to make an informed decision.</p> <p>Does not support applicants bearing the cost of expert valuation support when applications fees have already been paid, particularly as the council recognises in paragraph 2.31 that viability appraisals have time and cost implications for developers.</p>	<p>Comments” document that was prepared following the initial consultation on an Affordable Housing SPD in 2020 and which was made available to view as part of the consultation on the draft SPD. The formula selected is considered open and transparent without being over complex. It is also one that has been adopted by other local authorities. The advantages of the proposed approach were set out in paragraph number 2.30 of the draft SPD whilst the disadvantages of the other options looked at were within paragraph 2.31 of the draft SPD.</p> <p>In addition, following the 2023 consultation, further clarity has been added regarding the Average Transfer Value. The worked example has also been amended. This is now set out in appendix E.</p> <p>It is common practice across the industry for applicants to pay for viability assessments to be independently reviewed (with the Council choosing who undertakes the independent review). This is vital for the integrity of the planning process and to ensure that viability submissions are not being manipulated as a means of reducing planning policy requirements. The alternative, if the applicant does not wish to pay for the independent review, is simply to provide the full planning policies (which is the starting point for any planning application).</p> <p>If the applicant provides sufficient evidence, it may be possible for the council’s internal valuers to provide</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
			<p>comments on the information. However, it is felt appropriate for the council to be able to reserve the right to seek external advice where necessary. It is not considered unreasonable to expect the applicant to pay for this work.</p>
N/A	AH/12	<p>Considers that the formula is too simplistic and not robust. The worked example sets a new policy on commuted sums that substantially exceeds what can be justified by the local plan.</p>	<p>When calculating a commuted sum the most robust assessment would need to be through a full development appraisal. However, this has cost and time implications. It also would not allow a developer to easily understand the commuted sum liability at an early stage of the planning process, which is essential for developers to establish whether a scheme can be delivered. The Council subsequently decided that it was preferable to adopt a fixed calculation approach, to enable quick and easy assessments of the commuted sum to be undertaken. In addition, this approach has been adopted by numerous other Councils throughout England and is therefore considered to be consistent with the approach used in other authority areas. This formula cannot be compared to the Nottingham City Council approach, which dates back to 2006 and is considered to be outdated, not reflective of the prevalent market or the current guidance. It is also noted that other respondents accept the approach put forward as being reasonable.</p> <p>The advantages of the proposed approach was set out in paragraph number 2.30 of the draft SPD whilst the disadvantages of the other options looked at were within paragraph 2.31.</p>



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/12 continued.	<p>Considers that the resulting commuted sum (£900k / £180k per home) is 1.5 times the gross value of the affordable housing (£120k per home), and at odds with the current £25k per home rate and the £30k per home rate used by Nottingham City Council (a higher value area).</p>	<p>The council do not consider the formula is setting new policy. The policy on seeking commuted sums is set out in policy H4. The formula just sets out how the sum will be calculated.</p> <p>The figures used for the Average Market Value and Average Transfer Value in the worked example on page 13 of the draft SPD are not specific figures that relate to the district, they are used purely to demonstrate how the calculation works. As such, the £180,000 per dwelling that the respondent refers to is not the amount that the district council would end up seeking. The exact figures would be ascertained as part of each individual development. Therefore, there will not be a standard amount per dwelling that will be sought across the district.</p> <p>It is acknowledged that the figures are likely to be higher than the £25,000 per dwelling sought in the councils current Affordable Housing Interim Planning Guidance <a href="https://www.mansfield.gov.uk/downloads/file/766/affordable-housing-ipg">https://www.mansfield.gov.uk/downloads/file/766/affordable-housing-ipg</a>. However, the IPG came into effect on 1 April 2008 therefore it is important that the calculation used reflects the fact that the costs of providing affordable homes has changed in the intervening 15 years. If the figure stayed at a standard £25,000 per dwelling it would mean that there would be a shortfall and it would not be possible to deliver the affordable housing that is required. The elements that make up the formula will relate to the individual site. As such, the contribution generated will be farer, as it will not just be based on a standard amount per dwelling that is applied across the</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/12 continued.	<p>Considers the selection of the formula to be unclear and unjustified.</p> <p>Considers the sums far exceeds the net cost of providing off-site affordable housing and would act as a significant deterrent, which does not appear to have been considered.</p> <p>Considers that a formula approach should provide a commuted sum that is equivalent to the net cost of on-site provision and that developers</p>	<p>district.</p> <p>As noted above, the council have considered a number of formula that were suggested in the” Affordable Housing Supplementary Planning Document (SPD) – Response to consultation Comments” document that was prepared following the initial consultation on an Affordable Housing SPD in 2020. The formula selected it is considered to be open and transparent without being over complex. It is also one that has been adopted by other local authorities. Following the 2023 consultation, further clarity has been added regarding the Average Transfer Value. The worked example has also been amended. This is now contained in appendix E.</p> <p>As noted above, the costs refer to in the worked example are not the exact figures that the council will use to calculate the contribution, they are just figures to demonstrate how the calculation would work. The exact amount sought will be based on the individual circumstances that apply to each site using the various elements that make up the formula. The council will not have a standard cost per dwelling that will be applied across the district.</p> <p>Agree that the council should seek a contribution that reflects the cost of building affordable homes. As noted above, the worked example is not the exact figure that the council will use it is to illustrate how it would work. The council have looked a range of options and consider that the one selected</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		should be able to opt for a valuation approach.	is appropriate as it includes elements that relate specifically to the individual scheme. This is unlike the current approach (£25,000 per dwelling) that is applied district wide.
N/A	AH/13	Accepts the commuted sum approach but objects to paragraph 2.25 and recommends it is deleted. This is on the basis that it undermines the purpose of the SPD to provide clarity.	It is considered that this paragraph does provide clarity as it directs developers to table 3. This sets out the size of development whereby on-site provision will generally be expected. On this basis, it is felt that the paragraph should remain within the document.
N/A	AH/14	Accepts the commuted sum approach but objects to paragraph 2.25 and recommends it is deleted. This is on the basis that it undermines the purpose of the SPD to provide clarity.	It is considered that this paragraph does provide clarity as it directs developers to table 3. This sets out the size of development whereby on-site provision generally will be expected. On this basis, it is felt that the paragraph should remain within the document.
<b>Q8a - Do you agree with how and where commuted sums will be spent as set out in paragraphs 2.36 and 2.37 of the Draft SPD?</b>			
No responses were received on this question – No further action required.			
<b>Q8b - Reason(s)</b>			
No responses were received on this question – No further action required.			
<b>Q9a - Do you agree with the councils proposed approach to viability as set out in paragraphs 2.38 through to 2.48 of the Draft SPD?</b>			
N/A	AH/11	Yes, agrees.	Noted.
<b>Q9b - Reason(s)</b>			
N/A	AH/11	Supports the reference to recessions / similar significant economic changes when	Noted – No further action required.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		reconsidering whether contributions are viable when preparing a viability assessment.	
<b>Q10a - Do you agree with how it is proposed to calculate and apply the vacant building credit as set out in paragraphs 2.49 through to 2.51 of the Draft SPD?</b>			
No responses were received on this question – No further action required.			
<b>Q10b Reason(s)</b>			
No responses were received on this question – No further action required.			
<b>Q11a - Do you have any comments about how to determine whether a building has been abandoned as set out in paragraph 2.52 of the Draft SPD?</b>			
No responses were received on this question – No further action required.			
<b>Q11b - If you answer yes to Q11a, please provide detail</b>			
No responses were received on this question – No further action required.			
<b>Q12a - Do you agree with councils approach to Build to Rent as set out in paragraphs 2.53 through to 2.59 of the Draft SPD?</b>			
No responses were received on this question – No further action required.			
<b>Q12b - Reason(s)</b>			
No responses were received on this question – No further action required.			
<b>Q13a - Do you agree with the proposed approach to design and layout for affordable housing as set out in paragraphs 2.60 through to 2.62 of the Draft SPD?</b>			
N/A	AH/1	Yes, agrees.	Noted.
N/A	AH/11	No – Does not agree.	Noted.
<b>Q13b - Reason(s)</b>			
N/A	AH/1	Agrees with the approach to design and layout but gives no reason.	Noted – No further action required.
N/A	AH/11	Supports the achievement of high quality design (as set out in	It is considered useful to provide guidance on what the council will expect as part of the layout of schemes. It is not

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		<p>the Local Plan) but considers the wording in paragraphs 2.61 - 2.62 is too prescriptive. Recommends the removal of this section with any introduction of further standards done through the Local Plan process, where it can be further consulted on and examined in public.</p>	<p>introducing National Space Standards. As set out below, for these to be introduced it would require specific policies within the Local Plan.</p>
<p><b>Q14a - Do you agree that, whilst not a requirement, the Nationally Described Space Standards as referred to in paragraphs 2.63 and 2.64 of the Draft SPD are best practice and their use should be encouraged?</b></p>			
N/A	AH/1	No – Does not agree.	Noted.
N/A	AH/11	No – Does not agree.	Noted.
N/A	AH/12	No – Does not agree.	Noted.
<p><b>Q14 - Reason(s)</b></p>			
N/A	AH/1	<p>Does not agree with the use of the Nationally Described Space Standards. States that they cannot be retrospectively applied and therefore are out of the remit of the SPD and should be removed.</p>	<p>Paragraph 2.64 of the draft SPD (now paragraph 2.62) acknowledges that for the Nationally Described Space Standards to be sought as part of development, policies are required within the Local Plan, which is currently not the case (although it could be looked at as part of the forthcoming Local Plan review). Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that reference to these standards can be retained.</p>
N/A	AH/11	<p>Does not support reference to the nationally described space standards. The council should include them in the Local Plan review where they can be</p>	<p>Paragraph 2.64 of the draft SPD (now paragraph 2.62) acknowledges that for the Nationally Described Space Standards to be sought as part of development, policies are required within the Local Plan, which is currently not the case (although it could be looked at as part of the forthcoming</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
		consulted on and examined in public.	Local Plan review). Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that reference to these standards can be retained.
N/A	AH/12	Considers this a matter for a local plan review.	Paragraph 2.64 of the draft SPD (now paragraph 2.62) acknowledges that for the Nationally Described Space Standards to be sought as part of development, policies are required within the Local Plan, which is currently not the case (although it could be looked at as part of the forthcoming Local Plan Review). Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that reference to these standards can be retained.
<b>Q15a - Do you agree that use of the Adaptability Standards, as referred to in paragraphs 2.65 through to 2.68 of the Draft SPD, should be supported?</b>			
N/A	AH/1	No – Does not agree.	Noted.
N/A	AH/11	No – Does not agree.	Noted.
N/A	AH/12	No – Does not agree.	Noted.
<b>Q15b Reason(s)</b>			
N/A	AH/1	Does not agree that the Adaptability Standards should be included in the SPD on the basis that they are key viability matters that should be considered through the local plan examination process. States that High Court decisions are clear on the legality of this.	Paragraph 2.68 of the draft SPD (now paragraph 2.66) acknowledges that it is not possible to require the provision of dwellings which meet either Part M4 (2) or M4 (3) as the requirement was not included in the local plan (although it could be looked at as part of the forthcoming Local Plan Review).  Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
			reference to these standards can be retained.
N/A	AH/11	Does not support reference to either Part M4 (2) or M4 (3) as not included in the local plan and because of the undue burden it would place on development. The council should include these standards in the Local Plan review where they can be consulted on and examined in public.	<p>Paragraph 2.68 of the draft SPD (now paragraph 2.66) acknowledges that it is not possible to require the provision of dwellings which meet either Part M4 (2) or M4 (3) as the requirement was not included in the local plan (although it could be looked at as part of the forthcoming Local Plan review).</p> <p>Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that reference to these standards can be retained.</p>
N/A	AH/12	Considers this a matter for a local plan review.	<p>Paragraph 2.68 of the draft SPD (now paragraph 2.66) acknowledges that it is not possible to require the provision of dwellings which meet either Part M4 (2) or M4 (3) as the requirement was not included in the local plan (although it could be looked at as part of the forthcoming Local Plan review).</p> <p>Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that reference to these standards can be retained.</p>
<b>Q16a - Do you agree with the proposal within paragraphs 2.69 and 2.70 of the Draft SPD, to require affordable housing on schemes for the elderly and those with disabilities / care needs which fall within use class C3 on the same basis as other developments?</b>			
N/A	AH/12	No – Does not agree.	Noted.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
<b>Q16b Reason(s)</b>			
N/A	AH/12	Considers this to be a matter for a local plan review.	Accepted – Paragraph 2.69 and 2.70 deleted.
<b>Q17a Do you have any other comments on the Draft SPD?</b>			
N/A	AH/1	Yes	Noted.
N/A	AH/2	Yes	Noted.
Sport England	AH/3	Yes	Noted.
Natural England	AH/4	Yes	Noted.
Nottingham & Nottinghamshire Integrated Care Board (ICB)	AH/5	Yes	Noted.
Highways England	AH/6	Yes	Noted.
N/A	AH/7	Yes	Noted.
Derbyshire County Council	AH/8	Yes	Noted.
The Coal Authority	AH/9	Yes	Noted.
Historic England	AH/10	Yes	Noted.
N/A	AH/11	Yes	Noted.
N/A	AH/12	Yes	Noted.
N/A	AH/13	Yes	Noted.
N/A	AH/14	Yes	Noted.
<b>Q17b If yes, please insert below</b>			
N/A	AH/1	Considers that the SPD is not fit for purpose on the basis that it:	Some of the evidence used was that which informed the Local Plan whilst, as stated in paragraph 1.3 of the Draft



Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/1 continued.	is based on out of date evidence; cites standards not supported by the local plan; misses out key information on ceiling price thresholds; is not clear and comprehensive; and, does not align with local plan and planning legislation.	<p>SPD, an addendum to the Housing Needs of Particular Groups Study was undertaken to inform the need for First Homes. This was supported by updated viability testing. As a result of the responses received as part of the consultation, further viability work was undertaken in April / May 2023 to reflect the more challenging economic conditions that were in place when compared to the initial viability work that was done in 2022. The results indicate that current viability outcomes remain generally positive and broadly in keeping with what has been identified in the past. Where viability challenges are identified, the Council's existing policy mechanism provides the flexibility to adjust policy requirements in order to stimulate delivery (if needed).</p> <p>It is acknowledged that some of the standards referred to are not within the Local Plan however, they are included purely to encourage best practice. The reference in paragraphs 2.69 and 2.70 of the draft SPD requiring affordable housing on schemes for the elderly and those with disabilities / care needs which fall within use class C3 on the same basis as other developments has been removed. This issue will be addressed as part of the Local Plan review that is due to commence in 2023.</p> <p>In terms of meeting national and local policy requirements, please see response to question 3.</p>
Derbyshire and Nottinghamshire Local Enterprise	AH/2	No comments	Noted – No further action required.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
Partnership			
Sport England	AH/3	Does not wish to raise any issues or raise any concerns with either SPD.	Noted – No further action required.
Natural England	AH/4	No specific comments. Advises that if the SPD requires an Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA) (only in exceptional circumstances) MDC would be required to consult Natural England at certain stages, as set out in the Planning Practice Guidance.	Noted – No further action required.
Nottingham & Nottinghamshire Integrated Care Board (ICB)	AH/5	Does not expect the SPD to impact upon their s106 requests for health contributions from residential schemes.	Noted – No further action required.
Highways England	AH/6	The SPD will not impact the safe operation of the Strategic Road Network. As a statutory consultee on planning applications, the SPD will indirectly be taken into consideration as part of any Transport Assessments / modelling work reviewed.	Noted – No further action required.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
N/A	AH/7	Comment received which highlights the need for affordable housing.	Noted – The council, through the Local Plan and the Affordable Housing SPD will continue to work with developers to ensure that affordable housing is provided to meet the needs of the district.
Derbyshire County Council	AH/8	No comments.	Noted – No further action required.
The Coal Authority	AH/9	Explains role of the Coal Authority and confirms no specific comments on the SPD.	Noted – No further action required.
Historic England	AH/10	No specific comments other than that the protection and enhancement of the historic environment should be considered in relation to the design and location of new housing development.	Noted – The adopted Local Plan contains a policy on the historic environment (HE1) that will be taken account of where required. There are also various policies that cover the wider issue of design e.g. P1 and P2. The Local Plan and accompanying policies map can be viewed at <a href="https://www.mansfield.gov.uk/local-plan/adopted-local-plan-2013-2033">https://www.mansfield.gov.uk/local-plan/adopted-local-plan-2013-2033</a>
N/A	AH/11	In summary, considers any guidance that is not a national policy requirement, legal requirement, or already established local policy (that was found sound through the Local Plan examination) should be removed from the SPD to ensure that unnecessary pressure or cost is not placed on developers.	<p>Paragraphs 2.64 (design and layout) and 2.68 (specialist housing accommodation) of the draft SPD (now paragraphs 2.62 and 2.66) acknowledge that it is not possible for these standards to be sought, as they were not addressed as part of the production of the Local Plan. Reference to them is included within the SPD purely to encourage the adoption of best practice not to make it a formal policy requirement. Therefore, it is considered that reference to these standards can be retained.</p> <p>In terms of the proposed requirement for affordable housing on schemes for elderly people and those with disabilities / care needs (as set out in paragraphs 2.69 and 2.70), it is</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
			acknowledged that this should be done through the Local Plan and these two paragraphs have been deleted.
N/A	AH/12	<p>Disappointed that a tracked changes version of the 2020 consultation draft was not provided, especially as a consultation statement has not been produced. Attaches original points as still applicable.</p> <p>Considers that the SPD doesn't clearly meet the NPPF and in some areas is contrary. It goes beyond supplementing policy and strays into establishing new policy.</p> <p>Considers that this subject should have been addressed at local plan stage and been subject to examination, and would be best left now until a plan review.</p>	<p>Comment about tracked change version of the document noted. A consultation responses document for the 2020 consultation has been produced and is incorporated in the consultation statement that has been produced for the 2023 consultation.</p> <p>See responses given to various other questions that consultee has submitted comments on and which cover these issues.</p> <p>Policy H4 of the adopted Local Plan sets out the councils approach to Affordable Housing. Paragraph 5.41 that provides the supporting text to the policy states "<i>The council will prepare a Supplementary Planning Document on affordable housing providing further guidance on affordable housing including viability, and the justification for off-site provision.</i>" The development of the SPD meets this commitment.</p>
N/A	AH/13	Does not consider that a consistent and clear evidence base exists.	See council's responses to question 3, including reference to additional viability work being undertaken in April 2023.

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/13 continued.	<p>Considers that there are several areas where the draft SPD should be amended to ensure affordable housing is viable and there is clarity for users of the SPD.</p> <p>Concludes that in relation to the evidence base there is a lack of consistency in how assumptions have been applied and that a number of inputs should be reviewed.</p> <p>Considers, as a result, that there are several areas where the draft SPD should be amended to ensure delivery of Policy H4 and clarity for applicants.</p>	<p>Some elements of the SPD have been amended following the comments received as part of this consultation.</p> <p>See council's responses to question 3, including reference to additional viability work being undertaken in April 2023.</p> <p>Some elements of the SPD have been amended following the comments received as part of this consultation.</p>
N/A	AH/14	<p>Does not consider that a consistent and clear evidence base exists.</p> <p>Considers that there are several areas where the draft SPD should be amended to ensure affordable housing is viable and there is clarity for users of the SPD.</p>	<p>See council's responses to question 3, including reference to additional viability work being undertaken in April 2023.</p> <p>Some elements of the SPD have been amended following the comments received as part of this consultation.</p>

Organisation details (if applicable)	Comment ref	Officer summary	MDC response to comment / Action
	AH/14 continued.	<p>Concludes that in relation to the evidence base there is a lack of consistency in how assumptions have been applied and that a number of inputs should be reviewed.</p> <p>Considers, as a result, that there are several areas where the draft SPD should be amended to ensure delivery of Policy H4 and clarity for applicants.</p>	<p>See council's responses to question 3, including reference to additional viability work being undertaken in April 2023.</p> <p>Some elements of the SPD have been amended following the comments received as part of this consultation.</p>

## 6 Conclusion

- 6.1 This consultation focused on the approach that Mansfield District Council will take to deliver affordable housing that is required to meet the needs of the district. There was a modest response to the consultation however; the comments received were sufficiently detailed to help inform the content of the SPD. There was a mix of respondents representing specific consultation bodies, general consultation bodies and a member of the public.
- 6.2 As a result of the second round of public consultation, further work has been undertaken by the council's independent viability expert. This has involved undertaking additional viability testing to examine the implications of updated costs relating to the delivery of affordable housing. This has been used to inform the content of the updated SPD. A copy of the viability testing can be viewed at [www.mansfield.gov.uk/spd](http://www.mansfield.gov.uk/spd).
- 6.3 As a result of the consultations that took place, we have made the following changes to the Affordable Housing SPD:
- Clarity has been given to confirm that the tenure mix in Table 1 of the SPD will also apply on schemes that are for 100% affordable housing;
  - The list of factors that will be considered when considering the mix of affordable homes by bedroom size (set out in paragraph 2.11 of the SPD) has been added;
  - The list of circumstances whereby commuted sums will be accepted has been amalgamated into paragraph 2.20 of the SPD. It has also been amended to reflect the wording in Local Plan policy H4 (4);
  - Further clarity has been provided in terms of the commuted sum, including how it will be calculated and the definition of the Average Transfer Value. The worked example of the calculation has also been updated and is now included at appendix E of the SPD;
  - As part of the commuted sum calculation, the Average Transfer Value figures that will be used depending on tenure have been included with a caveat that they will be subject to review on an annual basis;
  - A new paragraph that concerns overage clauses has been inserted (new paragraph 2.46);
  - The approach to calculating the Vacant Building Credit has been simplified and an example provided;
  - The figures in table 4 (Median Monthly Rent and Eligible Rent levels) have been amended to reflect more up to date information. The figures linked to this in revised paragraph 2.55 have also been amended; and
  - The reference to requiring the provision of affordable housing on schemes for elderly people and those with disabilities / care needs that fall within

use class C3 on the same basis as other developments has been removed.

6.4 The Affordable Housing SPD is due to be adopted in summer 2023. Following this, the SPD will be a material consideration when determining planning applications within the district. It will also replace the approaches to affordable housing as set out in the following district council document:


- Interim Planning Guidance Note 7: Affordable Housing (<https://www.mansfield.gov.uk/downloads/file/766/affordable-housing-ipg>)




# Appendix A – Examples of 2020 Consultation Documentation and Publicity

Letters sent to agents and consultees by post and email (2,783)

**Mansfield District Council**



Planning Policy,  
Mansfield District Council,  
Civic Centre,  
Chesterfield Road South,



4 March 2020

Dear Sir/Madam,

**Affordable Housing Supplementary Planning Document: Consultation Draft**

As someone who has previously commented on Gypsy & Traveller issues or asked to be kept informed about the Local Plan we want to make you aware that the Council is now consulting on its Draft Affordable Housing Supplementary Planning Document (SPD). The SPD provides further guidance to support the implementation of emerging Local Plan policies, in particular Policy H4: Affordable Housing. The SPD does not address Gypsy & Traveller issues.

The consultation document sets out draft guidance on a number of matters including the type, tenure and mix of affordable housing required and commuted payments. The consultation provides an opportunity for individuals, organisations and stakeholders to make their views known.

We are consulting on the **Draft Affordable Housing Supplementary Planning Document from Friday 6 March to Monday 20 April 2020**.

The Development Plan Document and associated documents are available to view online by visiting our website at <https://www.mansfield.gov.uk/planningconsultations> and making comments through our consultation portal <http://mansfieldobjective.co.uk/portal>

Your username is:

If you have forgotten your password please visit the following link for a replacement: <http://mansfieldobjective.co.uk/commonforgottenPassword.jsp>

You can also view a copy of the Draft DPD at the Civic Centre, or the libraries within the district, during advertised opening hours throughout the consultation period.

Andy Abrahams – Elected Mayor      Hayley Barsby – Chief Executive Officer  
Civic Centre, Chesterfield Road South, Mansfield, NG19 7BH  
www.mansfield.gov.uk    T 01623 463463    E mdc@mansfield.gov.uk    f MyMansfieldUK    t @MDC\_News

We would prefer to receive your comments via the Consultation Portal, but if you wish to write to us please email [lp@mansfield.gov.uk](mailto:lp@mansfield.gov.uk) or write to the address on this letter.

Comments should reach us no later than 5pm on Monday 20 April 2020. Please note that any comments you make will be made public.

Yours faithfully,



Head of Planning & Regeneration

Hard copies of the Affordable Housing Supplementary Planning Document: Consultation Draft can be found at the following venues.

Mansfield District Council	Civic Centre, Chesterfield Road South, Mansfield, Nottinghamshire, NG19 7BH	01623 463463
Warsop Parish Council	Warsop Town Hall, Church Street, Warsop, Mansfield, NG20 0AL	01623 846011
Mansfield Library	Four Seasons Centre, West Gate, Mansfield, Nottinghamshire, NG18 1NH	01623 677200
Rainworth Library	Warsop Lane, Rainworth, Mansfield, Nottinghamshire, NG21 0AD	01623 677200
Ladybrook Library	Ladybrook Lane, Mansfield, Nottinghamshire, NG18 5JH	01623 677200
Warsop Library	High Street, Market Warsop, Mansfield, Nottinghamshire, NG20 0AG	01623 677200
Forest Town Library	Clipsstone Road West, Forest Town, Mansfield, Nottinghamshire, NG19 0AA	01623 677200
Clipsstone Library	First Avenue, Clipsstone, Mansfield, Nottinghamshire, NG21 9DA	01623 677200
Mansfield Woodhouse	Church Street, Mansfield Woodhouse, NG19 8AH	01623 677200

**Mansfield District Council**



Planning Policy,  
Mansfield District Council,  
Civic Centre,  
Chesterfield Road South,



4 March 2020

Dear Sir/Madam,

**Affordable Housing Supplementary Planning Document: Consultation Draft**

As someone who has previously commented on Gypsy & Traveller issues or asked to be kept informed about the Local Plan we want to make you aware that the Council is now consulting on its Draft Affordable Housing Supplementary Planning Document (SPD). The SPD provides further guidance to support the implementation of emerging Local Plan policies, in particular Policy H4: Affordable Housing. The SPD does not address Gypsy & Traveller issues.

The consultation document sets out draft guidance on a number of matters including the type, tenure and mix of affordable housing required and commuted payments. The consultation provides an opportunity for individuals, organisations and stakeholders to make their views known.

We are consulting on the **Draft Affordable Housing Supplementary Planning Document from Friday 6 March to Monday 20 April 2020**.

The Development Plan Document and associated documents are available to view online by visiting our website at <https://www.mansfield.gov.uk/planningconsultations> and making comments through our consultation portal <http://mansfieldobjective.co.uk/portal>

If you have forgotten your password please visit the following link for a replacement: <http://mansfieldobjective.co.uk/commonforgottenPassword.jsp>

You can also view a copy of the Draft DPD at the Civic Centre, or the libraries within the district, during advertised opening hours throughout the consultation period. We would prefer to receive your comments via the Consultation Portal, but if you wish to write to us please email [lp@mansfield.gov.uk](mailto:lp@mansfield.gov.uk) or write to the address on this letter.

Andy Abrahams – Elected Mayor      Hayley Barsby – Chief Executive Officer  
Civic Centre, Chesterfield Road South, Mansfield, NG19 7BH  
www.mansfield.gov.uk    T 01623 463463    E mdc@mansfield.gov.uk    f MyMansfieldUK    t @MDC\_News

Comments should reach us no later than 5pm on Monday 20 April 2020. Please note that any comments you make will be made public.

Yours faithfully,



Head of Planning & Regeneration

Hard copies of the Affordable Housing Supplementary Planning Document: Consultation Draft can be found at the following venues.

Mansfield District Council	Civic Centre, Chesterfield Road South, Mansfield, Nottinghamshire, NG19 7BH	01623 463463
Warsop Parish Council	Warsop Town Hall, Church Street, Warsop, Mansfield, NG20 0AL	01623 846011
Mansfield Library	Four Seasons Centre, West Gate, Mansfield, Nottinghamshire, NG18 1NH	01623 677200
Rainworth Library	Warsop Lane, Rainworth, Mansfield, Nottinghamshire, NG21 0AD	01623 677200
Ladybrook Library	Ladybrook Lane, Mansfield, Nottinghamshire, NG18 5JH	01623 677200
Warsop Library	High Street, Market Warsop, Mansfield, Nottinghamshire, NG20 0AG	01623 677200
Forest Town Library	Clipsstone Road West, Forest Town, Mansfield, Nottinghamshire, NG19 0AA	01623 677200
Clipsstone Library	First Avenue, Clipsstone, Mansfield, Nottinghamshire, NG21 9DA	01623 677200
Mansfield Woodhouse	Church Street, Mansfield Woodhouse, NG19 8AH	01623 677200

Press Release – 9 March 2020



**Mansfield**  
District Council

**Press Release**

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**For immediate release**

**09 March 2020**

### **Have your say on affordable housing**

Now is the chance for people to have their say on an affordable housing strategy for the Mansfield district.

A six-week consultation has started on the Consultation draft of the Affordable Housing Supplementary Planning Document, which has been drawn up by Mansfield District Council as guidance to support the implementation of emerging Local Plan policies.


The document looks at matters such as the type, tenure and mix of affordable housing required in the district. The consultation period, which is open until 5pm on Monday 20 April 2020, allows individuals, organisations and stakeholders to make their views known. Any comments will be made public.

Go to <https://www.mansfield.gov.uk/planningconsultations> to view the documents. The easiest way to comment on them is online via the consultation portal at <https://mansfield.objective.co.uk/portal>.

## Appendix B – Example of 2023 Consultation Documentation and Publicity

Consultation Letter (89 letters and 1,633 (similar) emails sent)

# Mansfield District Council



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«AddressBlock»

«GreetingLine»

**Re: Mansfield District Council draft supplementary planning documents (SPDs) on Affordable Housing and Biodiversity Net Gains**

Mansfield District Council is committed to delivering sustainable communities that are safe, healthy and inclusive. This includes the provision of affordable housing to meet the needs of the residents within the district, and providing biodiversity net gain through new developments.

The district council has produced a two draft SPDs to expand upon policies in the Adopted Mansfield District Local Plan 2013 – 2033 (which can be viewed at <https://www.mansfield.gov.uk/local-plan/adopted-local-plan-2013-2033>).

The draft **Affordable Housing Supplementary Planning Document (SPD)** relates to Policy H4 and provides more details about how the planning system will help secure the provision of affordable housing within the district. This includes cases where physical or financial planning obligations (also known as Section 106 Agreements or 'planning gain') may be required and how any financial obligations will be calculated. It also sets out the district council's position on how it will address the requirements in relation to First Homes. The planning practice guidance on First Homes can be viewed at <https://www.gov.uk/guidance/first-homes>

The draft **Biodiversity Net Gains Supplementary Planning Document (SPD)** relates to Policy NE2 and sets out the preferred approach to providing biodiversity net gain arising from new developments. The SPD will provide a basis for seeking biodiversity net gain in advance of the mandatory 10 percent target from November 2023 onwards, introduced by the Environment Act 2021.

You can make comments on the draft SPDs from **9 January to 5pm on 20 February**. All comments received will be used to inform the final documents which, upon adoption by Mansfield District Council, will be material considerations when determining planning applications.

**Contact:** [REDACTED]


**Your ref:** «Person\_ID»

**Our ref:** SPD2023

**Direct line:** [REDACTED]

**Email:** [lp@mansfield.gov.uk](mailto:lp@mansfield.gov.uk)

**Date:** 5 January 2023



You can view the documents and comment online by visiting our consultation portal: <https://mansfield-consult.objective.co.uk/kse> or by scanning the QR code on the left with the camera on your smartphone.

Your username is: «Username»

Andy Abrahams – Elected Mayor      Adam Hill – Chief Executive Officer  
Civic Centre, Chesterfield Road South, Mansfield, NG19 7BH  
[www.mansfield.gov.uk](http://www.mansfield.gov.uk)    T 01623 463463    E [mdc@mansfield.gov.uk](mailto:mdc@mansfield.gov.uk)    [f MyMansfieldUK](https://www.facebook.com/MyMansfieldUK)    [@MDC\\_News](https://twitter.com/MDC_News)

To make comments online, please contact us quoting your reference or username, at [lp@mansfield.gov.uk](mailto:lp@mansfield.gov.uk) or on 01623 463322 / 463182 / 463200 so that we can link your account with your email address and send you a password.

You can also view a copy of each document at the Civic Centre and at each county library in the district during the consultation period. Please check opening times.

Comments must be made in writing and should preferably be sent electronically via the consultation portal or by email to [lp@mansfield.gov.uk](mailto:lp@mansfield.gov.uk). Any comments sent by post should be addressed to the Planning Policy Team Leader at the address below and reach the council no later than **5pm on 20 February 2023**.

Mansfield District Council  
Civic Centre  
Chesterfield Road South  
Mansfield  
NG19 7BH

Please note that any comments you make may be made publicly available. We will process your data in accordance with our privacy statement. This can be viewed at [www.mansfield.gov.uk/privacy](http://www.mansfield.gov.uk/privacy).

You have received this letter because you are listed on Mansfield District Council's Local Plan database. We'd be grateful if you could let us know your email address so that we can reduce our paper usage. Please contact us, quoting your reference or username, at [lp@mansfield.gov.uk](mailto:lp@mansfield.gov.uk) or on 01623 463322 / 463200 / 463182 to update your details, for further information, or to be removed from our records.

Yours Faithfully

A black rectangular box redacting the signature of the Principal Planning Policy Officer.

Principal Planning Policy Officer  
Mansfield District Council

Poster – Made available in libraries, Civic Centre Reception and Warsop Town Hall



**Mansfield District Council**

## Are you interested in shaping guidance for developers on biodiversity and affordable housing?

We are currently consulting on two documents and would like to hear your views.

The **Draft Affordable Housing Supplementary Planning Document (SPD)** sets out guidance for developers on how affordable housing will be provided as part of housing developments within the district.



The **Draft Biodiversity Net Gains Supplementary Planning Document (SPD)** sets out an approach to providing biodiversity net gain arising from new developments.




**Available to view here and at:**

<https://mansfield-consult.objective.co.uk/kse>

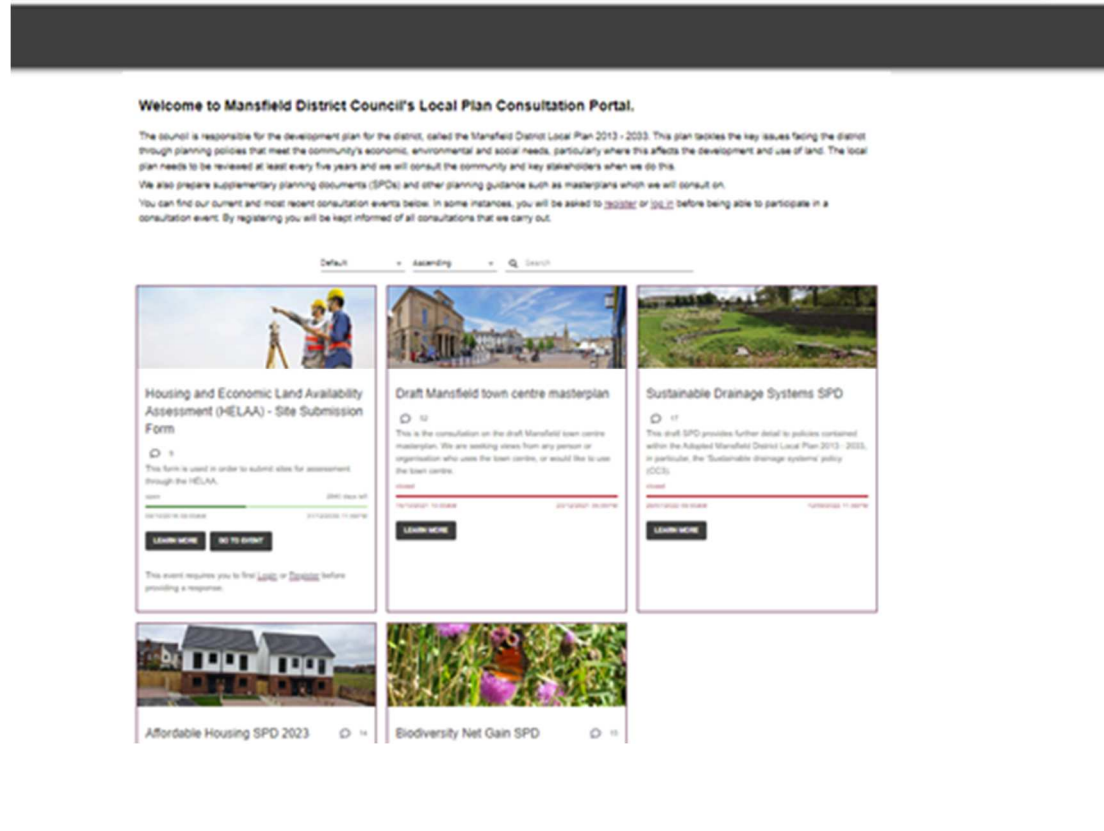


**by 5pm on  
20 February 2023**

Please send your comments to:  
**Planning Policy Team, Mansfield District Council,  
Civic Centre, Chesterfield Road South, Mansfield, NG19 7BH**

 [www.mansfield.gov.uk](http://www.mansfield.gov.uk)     [MyMansfieldUK](https://www.facebook.com/MyMansfieldUK)     [@MDC\\_News](https://twitter.com/MDC_News)

## Screenshots of Planning Policy consultation webpages



### Affordable Housing SPD 2023

INFORMAL SUBMISSION - CLOSED

Draft guidance in relation to affordable housing, issued for public consultation.

SURVEY DETAILS	WHAT PEOPLE SAY
<p><b>More Information</b> ▲</p> <p>Planning Policy Team                      Mansfield District Council                      01623 463322  <a href="mailto:lp@mansfield.gov.uk">lp@mansfield.gov.uk</a>                      Civic Centre Chesterfield Road South                      Mansfield Nottinghamshire NG19 7BH</p> <p><b>Supporting Files</b> ▲</p> <ul style="list-style-type: none"> <li><a href="#">Consultation Draft Affordable Housing SPD Dec 22.docx</a></li> <li><a href="#">Final Version Viability</a></li> <li><a href="#">Mansfield First Homes Final February 2022.pdf</a></li> <li><a href="#">Affordable Housing SPD response to consultation comments Nov 2020.pdf</a></li> </ul> <p><b>Recent Comments</b> ▲</p> <p>See <a href="#">What People Say</a>.</p>	<p><b>PRIVACY POLICY</b>                      If you take part: your name will not be shown, your answers may be displayed, your town/city will not be shown</p> <hr/> <p>Mansfield District Council is committed to delivering sustainable development.</p> <p>The district council has produced a Draft Affordable Housing Supplementary Planning Document (SPD) (<b>see Supporting Files</b>) to expand on policies of the <a href="#">Adopted Mansfield District Local Plan 2013 - 2033</a>, particularly Policy H4. The SPD provides detailed information about:</p> <ul style="list-style-type: none"> <li>the type and tenure of affordable housing required;</li> <li>the district council's position on how it will address the requirements in relation to First Homes;</li> <li>when off-site commuted sums may be sought and the proposed formula that will be used to calculate them;</li> <li>how to satisfactorily demonstrate that a different mix of types or level of affordable housing is required to make the scheme viable;</li> <li>vacant building credit;</li> <li>design and layout;</li> <li>build to rent schemes; and</li> <li>specialist housing accommodation.</li> </ul> <p>You can view a copy of the document here, or at the Civic Centre and at each county library in the district during the consultation period. Please check opening times (the Council understands that Rainworth Library is shut until 31st January 2023), and ensure you follow any social distancing guidelines in place.</p> <p>Comments must be made in writing and should preferably be sent electronically via the consultation portal or by email to <a href="mailto:lp@mansfield.gov.uk">lp@mansfield.gov.uk</a>. Any comments sent by post should be addressed to the Planning Policy Team Leader at the address below and reach the council no later than <b>20 February 2023</b>. Please note that any comments you make may be made publicly available.</p> <p>We will process your data in accordance with our privacy statement. This can be viewed at <a href="http://www.mansfield.gov.uk/privacy">www.mansfield.gov.uk/privacy</a>.</p> <p><i>Please note that this website will be live from 6 January 2023, although the consultation period officially starts on 9 January 2023.</i></p>

Press release (9 January 2023)

<https://www.mansfield.gov.uk/news/article/11612/have-your-say-on-documents-to-increase-biodiversity-and-affordable-housing-in-mansfield>

## Have your say on documents to increase biodiversity and affordable housing in Mansfield



People are being given a chance to help shape proposed planning guidance documents for developers on how they can increase biodiversity and affordable housing.

Mansfield District Council is running a six-week public consultation from 9 January to 20 February for its proposed Biodiversity Net Gain Supplementary Planning Document (SPD) and Affordable Housing SPD.

Both documents were given formal approval to go to consultation by the Portfolio Holder for Regeneration and Growth on 5 December.

The biodiversity document will sit alongside the council's adopted Local Plan and seeks to set out the preferred approach to delivering biodiversity net gain arising from new developments within the district.

It also seeks to provide a basis for biodiversity net gain before the introduction of the mandatory 10 percent target in November 2023, passed through the Environment Act 2021.

The affordable housing SPD covers the council's approach to First Homes, the type and tenure of affordable housing required, build-to-rent schemes and specialist housing accommodation.

In addition to the Local Plan, the affordable housing SPD will provide the process and mechanisms to help ensure that the affordable housing required is delivered through the planning application and development process.

The documents can be accessed and downloaded on the council website in the planning policy section at [www.mansfield.gov.uk/planningconsultation](http://www.mansfield.gov.uk/planningconsultation) (opens in new window). People can take part in the consultation by answering questions at the end of each section using online or paper questionnaires.

Councillor Stuart Richardson, Portfolio Holder for Regeneration and Growth, said: "The council is committed to delivering measurable environmental benefits and high-quality developments to our residents, and the new metric included encourages developers to measure biodiversity impacts will pave the way.

"Without the biodiversity document, the council would have to rely on the policy adopted within the local plan, which does not give detail or quantity for how much biodiversity is on a site, meaning it also cannot be managed or monitored.

"The affordable housing document covers the type and tenure of affordable housing required in the district, build to rent schemes, and design and layout. This guidance will be a material consideration when determining planning applications within the district.

"I would encourage all our residents to engage with the consultation and have their say on how biodiversity and affordable housing can be shaped on future developments in the district."

Printed copies of the draft guidance can also be viewed at Mansfield Civic Centre or libraries within the district. A printed copy can also be provided in exceptional circumstances where someone cannot access the document online. Comments should be returned in person or by mail.

To find out more about council planning policy, visit the council website at [www.mansfield.gov.uk/planning-policy](http://www.mansfield.gov.uk/planning-policy) (opens in new window).

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**Published:** January 9th 2023

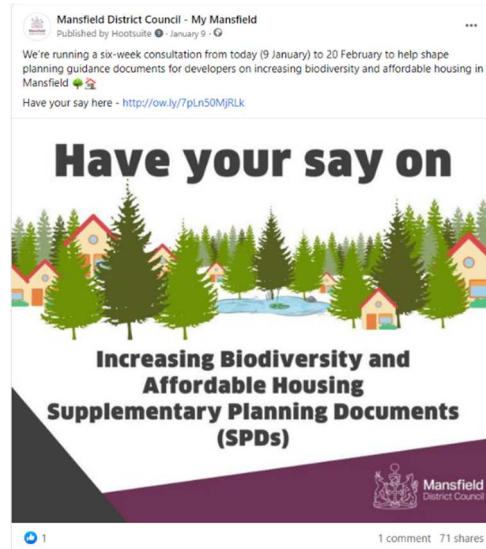


## Social media

Posts were added to the council's Facebook, Instagram, Twitter and LinkedIn social media channels twice a week from 2 January

*Examples:*

### Facebook



### Instagram



Twitter



LinkedIn



Email newsletter – February 2023



## Internal Communications

Website - <https://www.mansfield.gov.uk/news/article/11612/have-your-say-on-documents-to-increase-biodiversity-and-affordable-housing-in-mansfield>

Home / Latest news / Have your say on documents to increase biodiversity and affordable housing in Mansfield

## Have your say on documents to increase biodiversity and affordable housing in Mansfield

People are being given a chance to help shape proposed planning guidance documents for developers on how they can increase biodiversity and affordable housing.



Share on



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## All Staff Email

### **This email has been sent to all staff**

Mansfield District Council is giving people the chance to help shape proposed planning guidance documents for developers on how they can increase biodiversity and affordable housing.

We are running a six-week public consultation from 9 January to 20 February for the proposed Biodiversity Net Gain Supplementary Planning Document (SPD) and Affordable Housing SPD.

The biodiversity document will sit alongside the council's adopted Local Plan and seeks to set out the preferred approach to delivering biodiversity net gain arising from new developments within the district.

The affordable housing SPD covers the council's approach to First Homes, the type and tenure of affordable housing required, build-to-rent schemes and specialist housing accommodation.

Have your say here - <http://www.mansfield.gov.uk/planningconsultation>

Kind regards,

## Team Talk – 403 members

