

Statement of Consultation

Affordable Housing SPD

March 2013



The Affordable Housing Supplementary Planning Document (SPD) was produced in line with Regulations 12 and 13 of The Town and Country Planning (Local Planning) (England) Regulations 2012. It is a requirement of these regulations that a 'Statement of Consultation' is produced to set out how the Affordable Housing SPD has been prepared.

This Statement of Consultation sets out:

- i. Who the council consulted when preparing the SPD
- ii. A summary of the main issues raised
- iii. How those issues have been addressed in the revised SPD

How was the SPD developed?

An Affordable Housing SPD was adopted by the Council in 2006 and updated in 2007 therefore, prior to the public consultation, an internal Council Officer Group was set up to assess the need for the new SPD. Officers from the Planning (i.e. both Planning Policy and Development Management) and Housing departments formed the Core Group while other Officers were also consulted. Partnership working within this group ensured that policy requirements can be met, whilst considering the practical side of policy implementation. Housing Officers have vital knowledge of how Registered Providers operate and provided a view on their needs and how the policy should work for them, whilst Development Management colleagues have knowledge and experience of developers' approaches to the provision of affordable housing.

It was considered that the 2007 SPD contained valuable guidance and practices for the Council, which are still to be applied. However, the SPD was in need of an update with regards to the Core Strategy policy, and to reflect changes in the economic climate; which impacts on the ability of developers to provide affordable housing.

Who did the Council consult and how?

Once a draft SPD had been produced public consultation took place over a six week period between 12 November and 21 December 2012. All those on the Council's Local Development Framework database were consulted, which includes more than 2,000 consultees. For a complete list of all consultees please see Appendix 1. The following types of consultees were consulted:

- Statutory consultees
- Business community
- Community support groups
- Disability groups
- Education organisations
- Environment groups
- Ethnic groups
- Health organisations
- Heritage protection groups

- Housing developers, including market housing, Registered Providers and student housing developers
- Local residents and interested parties
- Infrastructure providers
- Leisure groups
- Older people groups
- Planning Interest groups, e.g. planning consultants
- Political groups
- Religious groups
- Residents Associations
- Transport organisations
- Young people

Consultees were informed of the consultation by letter or email, while the draft SPD was published on the Council's website and paper copies were made available for public viewing in public libraries and at the Council's Information and Advice Centre.

During the public consultation the SPD was also reported to each of the Council's Neighbourhood Committees. Members were invited to make individual representations on the SPD while comments from the committees were also considered as consultation responses.

Summary of the main issues

A full schedule of consultation responses, with the Council's response, can be found in Appendix 2. A summary of the main issues raised from the public consultation are as follows:

- Concern that the policy requirement is more onerous as the threshold for affordable housing has lowered to 5 units
- The need to balance meeting student housing and market housing need
- Concern that developers may try to evade site thresholds, either by lowering densities, by phasing development, by submitting subsequent applications on the same site, or by the incremental acquisition of sites.
- Consultees wanted to ensure that affordability levels were appropriate to the housing needs of the Borough
- Considered that the SPD should make reference to Lifetime Homes and wheelchair housing
- Support for off-site affordable housing provision and payments in-lieu, however this gave rise to concern that money could not be spent due to lack of sites in the Borough
- Concern that the policy provides too much flexibility and this may cause risk to not achieving affordable housing
- Concern that the mix of affordable homes required by policy cannot be achieved

The draft SPD has been amended in response to the public consultation, where necessary. Details of agreed changes are provided within Appendix 2.

Appendix 1 - Consultees

(November 2012)

Statutory Consultees

- Environment Agency
- English Heritage
- Natural England
- The Mayor of London
- Civil Aviation Authority
- Homes and Community Agency (now under the GLA's Housing and Regeneration Directorate)
- Primary Care Trust
- Office of Rail Regulation
- Transport for London
- Highways Agency
- Network Rail
- Surrey County Council
- Elmbridge Borough Council
- Epsom and Ewell Borough Council
- London Borough of Merton
- London Borough of Richmond upon Thames
- London Borough of Sutton
- London Borough of Wandsworth
- Metropolitan Police Authority
- Mole Valley District Council
- Claygate Parish Council
- Thames Water Plc
- British Gas Plc
- Coal Authority
- Mobile Operators Association
- National Grid
- NHS Kingston
- Ofcom
- Ofgem - London
- Powergen plc
- Scotia Gas Networks
- The Planning Inspectorate
- Transco

Businesses

- Adams and Adams Ltd
- Adrienne Hill Ltd
- Alderwick James and Co
- Allen Pyke Associates
- American Pie
- Arrow Plastics Ltd
- Barton Willmore
- Bell Cornwell Partnership
- Bentall Centre Management
- Bentalls
- BMR
- Boots
- British Home Stores
- Carluccios
- Carter & Carter
- Carter Bells LLP
- CBI (London Region)
- Chelsea Building Society
- Chris Thomas Ltd.
- Denis Wilson Partnership
- Diocesan Board of Finance
- DTA Computer Systems
- Edward Jones Ltd
- Egmont UK
- Federation of Small Businesses
- Formula Strike International Ltd
- Four Communications Group PLC
- Fusion Arts
- Gerald Cullfiord Ltd
- Hermes Hotel
- House of Fraser
- Howdens Joinery Co.
- J Sainsbury plc
- J.R. Spalding Joinery
- Jackson-Scott Associates LTD
- John Lewis Partnership
- John Sharkey and Co.
- Kidd Adam Ltd
- Kingston and Leatherhead Branch of CAMRA
- Kingston Employment Service
- Kingston Informer
- Kingston Innovation Centre
- Kingston Jobcentre
- Kingston Market Traders Association
- Kingston Tour Guides
- Kingstonfirst
- Lakeside Estates Ltd
- Lever Faberge
- LIDL UK
- Lloyds TSB
- Longford Securities and Equities Limited
- Malden Golf Club
- Maple Antiques
- Marks & Spencer
- Martin Campbell Commercial
- McDonalds
- Music Services
- Nathaniel Lichfield and Partners
- Newsquest South London
- Nova Distribution
- Oceana
- Old London Road Traders Association

- O'Neils (Mitchell and Butlers)
- Osiers Court Properties Ltd
- Palmers Solicitors
- Parris Boat Hire
- Pearson Maddin Solicitors
- Prim Vintage Fashion
- Radio Jackie
- RBS
- Riverside Vegetaria Ltd
- Roofwise Ltd
- Royal Mail Legal Services (Property Law)
- Sainsbury's Supermarkets
- Simone Kay Stained Glass
- SNP Associates
- Spires Sports Ltd
- Spuds
- Suna Supplies LTD
- Surrey Comet
- The Hippodrome Nightclub
- The Rose Theatre
- Tony Miller Systems Ltd
- TP Bennett Architects
- Turk Launches Ltd
- West & Partners
- Wilderberry Ltd.
- Wilkinson Stores

Community Support Groups

- Kaleidoscope
- Kingston Advocacy Group
- Kingston Carers Network
- Kingston Citizens Advice Bureau
- Kingston Victim Support
- Kingston Voluntary Action
- London Forum of Amenity and Civic Societies
- Royal British Legion Institute
- Royal British Legion, Malden and Coombe Branch
- Thames Community Foundation
- The Equality and Human Rights Commission

Disability Groups

- Anchor Trust
- Connect
- Crescent Resource Centre
- Disability Equality Group
- HFT
- Home Farm Trust
- Information Officer for Disabled Children
- Kingston Association for the Blind
- Kingston Centre for Independent Living
- London Access Forum
- Mental Aid Projects
- MS Society (North Surrey)
- Parkinson's UK
- People with Learning Disabilities Partnership Board
- Positive Action for Multiple Sclerosis
- R.O.Y.A.D
- Scope (N E Surrey) Geneva Road
- Sensory Impairment Team
- Surbiton Deaf Club
- Talking Newspaper
- Team for Disabled Children

Education

- Alexandra Infant School
- Bedelsford School
- Buckland Infant and Nursery
- Burlington Junior School
- Chessington Community College
- Christ Church Infants' School
- Christ Church Junior School
- Christ Church New Malden C of E Primary
- Christ Church Primary School
- Coombe Boys School
- Coombe Girls' School
- Coombe Hill Infant and Junior School
- Corpus Christi Primary
- Dysart School
- Ellingham Primary School
- Euphrates Education Foundation (Arabic School)
- Fern Hill Primary School
- Green Lane School
- Hindi Bal Bhawan
- Holy Cross Preparatory School
- King Athelstan Primary School
- Kingston College
- Kingston Grammar School
- Kingston Gurjarati School
- Kingston Tamil School
- Kingston University
- Knollmead Primary School
- Latchmere Junior School
- Learn English at home
- Lovelace Primary School
- Malden Manor Primary
- Malden Parochial Primary School
- Maple Infants School
- Our Lady Immaculate Primary School
- Princes Trust- Merton College
- Richard Challoner School
- Robin Hood Primary School
- Roehampton University
- Shrewsbury House
- Southborough School
- St Agatha's Catholic Primary School
- St Andrews and St Marks C of E Junior School
- St Joseph's RC Primary School
- St Luke's Primary School
- St Philip's School
- St. Johns C of E Primary School
- St. Mary's Primary School
- St. Matthew's Primary School
- St. Paul's C of E Junior School
- St. Paul's C of E Primary School
- The Hollyfield School and Centre for Continuing Education
- The Mount Primary School
- Tiffin Girls School
- Tiffin School
- Tolworth Girls School
- Tolworth Infants and Nursery School
- Tolworth Junior School

Environment

- British Geological Survey
- CPRE
- CPRE (London)
- Department for Environment, Food and Rural Affairs
- Fairtrade Kingston Steering Group
- Friends of the Earth Kingston
- Greater London Playing Fields Association
- Hurley Palmer Flatt
- Kingston Fair Trade
- LA21 Forum
- London Parks and Gardens Trust
- London Wildlife Trust
- Protect Our Green Spaces
- RenewableUK
- River Thames Society
- RSPB
- Rural Pride Limited
- Save the World Club
- Surbiton and District Bird Watching Society
- Surrey Wildlife Trust
- Thames Landscape Strategy
- The Royal Parks
- The Woodland Trust
- Viridor Waste Management Ltd

Ethnic groups

- Inequalities Partnership Board
- Irish Traveller Movement in Britain
- Kingston Asian Arts Forum
- Kingston Chinese Association
- Kingston Muslim Women's Association
- Kingston Racial Equality Council
- Kingston Sikh Association
- Kingston Ulster Society
- Kingston, Richmond and Surrey African Positive Outlook
- London Gypsy and Traveller Unit
- London South West Chinese Community Association
- Milaap Centre
- National Federation of Gypsy Liaison Groups
- Refugee action Kingston
- Sarvoday Hindu Association
- SW London Vietnamese Community Association
- The Gypsy Council

Health

- ACSA (Addiction Support and Care)
- Canbury Medical Centre
- Health and Safety Executives
- HUDU
- Inventures (NHS estates)
- Kingston & District Welcare Association
- Kingston Hospital Trust
- Kingston Samaritans
- Magic Roundabout
- Mental Health Partnership Board
- NHS
- NHS Kingston
- NHS London
- NHS London Healthy Urban Development Unit

Heritage

- Coombe Wood conservation area
- Friend of Kingston Museum & Heritage Service
- Garden History Society
- Historic Royal Palaces
- Kingston Society
- Kingston Town Neighbourhood Conservation Area Advisory Committee
- Kingston upon Thames Archaeological Society
- Maldens and Coombe Conservation Area Advisory Committee
- MLA London
- Museum of London Archaeology Department
- Railway Heritage Trust
- Surbiton Conservation Area Advisory Committee
- The Garden City Movement

Housing

- A2 Housing Group
- Ability Housing Association
- Affinity Sutton
- Appley Properties Limited
- Asra Housing Association
- Bridger Bell
- Broomleigh Housing Association
- Clear Water Estates
- D&M Planning Ltd
- Fairview New Homes Ltd
- Family Housing Association
- Gleeson
- Hanover Housing Assoc.
- Hestia Housing (Kingston Womens Centre)
- Home Group
- Horizon Housing Group
- House Builders Federation
- Housing 21
- Inquilab Housing Association
- Invista Real Estate on behalf of Clerical Medical
- JLA Limited
- Kingston Churches Housing Association
- Kingston upon Thames United Charities
- L&Q Group
- MAA Architects
- Metropolitan Housing Trust
- Millat Asian Housing Association
- Moat Housing Society
- Molior London
- New Era Housing Association
- North British Housing Association
- PAD Consultancy Limited
- Paragon Community Housing Group
- PML Building Services Limited
- Raglan Housing Assoc
- Richmond Housing Partnership
- Richmond upon Thames Churches Housing Trust
- Riverhaven Ltd
- Rosemary Simmonds Memorial Housing Assoc.
- Sheperds Bush Housing Association
- Solon Wandsworth Housing
- SPH Housing
- Spiritbond Student Housing Ltd
- St George West London
- Teachers Housing Association
- Terry Hill Design and build
- Thames Housing Association
- Thames Valley Housing Association
- Threshold Housing and Support
- Town and Country Housing Group
- Wandle Housing Association
- YMCA

Individuals – 1555 local residents on the LDF database

Infrastructure Providers

- Health and Safety Executive
- Kingston Magistrates Court
- London Ambulance Service
- London Fire and Emergency Planning Authority
- London Fire Brigade
- London Fire Brigade
- Metropolitan Police
- MONO
- On behalf of Metropolitan Police Authority
- Police and Community Working Group
- UK Power Networks

Leisure

- AFC Wimbledon
- Campaign for Real Ale
- Cannons Health and Fitness
- Chessington Young Mums Group
- Friends of Kingston Museum
- Kingston Arts Council
- Kingston Centre for Independent Living
- Kingston Debating Society
- Kingston Museum
- Kingston Theatre
- Kingston Tour Guides
- LDWA London
- Leatherhead Golf Club Ltd
- Lexum Leisure (McCluskeys)
- Malden Camera Club
- Minima Yacht Club
- Natural History Museum
- PRO-ACTIVE South London
- River Thames Boat Project
- Rotunda
- Saheli (Asian Womens Group)
- Scout Association
- Sport England
- Steadfast Sea Cadets
- Thames Sailing Club
- The Lawn Tennis Association
- The Theatres Trust

Older People

- Age Concern Kingston upon Thames
- Help the Aged
- Kingston Borough Forum for Elderly People
- Kingston Pensioners Forum
- Older Peoples Partnership Board

Planning Interest

- 3s Architects LLP
- Alliance Planning
- Arnold Gilpin Associates Ltd
- Assent Environmental Planning
- Barton Willmore
- Bell Fischer Landscape Architects
- Bonsor Penningtons
- Boyer Planning
- BRE
- Broadway Malyan
- Burnett Planning and Development
- C&S Associates
- Canadian and Portland Estates Ltd.
- Capitalise Assets LLP
- Cattaneo Commercial
- CBRE
- CgMs
- Chessington Nurseries
- Cluttons LLP
- CNM Estates
- Coal Pension Properties
- Colliers CRE
- Colliers International
- Crown Estate Office
- Cunnane Town Planning LLP
- Cushman and Wakefield
- Dalton Warner Davis LLP
- David Lock associates Ltd
- Davis Planning
- Day Group Ltd.
- DB Schenker (UK)
- DE Headquarters
- Defence Estates Property Team
- Denton Wilde Sapte
- Design Council CABE
- Designature
- Development Planning Partnership
- Dialogue
- DPDS Consulting Group
- DPP LLP
- Drivas Jonas Deloitte
- Elborough
- Entec, Environmental and Engineering Consultancy
- Entec UK Ltd on behalf of The Crown Estate
- ESA Planning Ltd.
- Evans Roden Myzen
- Firstplan
- FirstPlus Planning
- Fusion
- Fusion Ltd.
- G L Hearn
- G R Planning Consultancy Ltd
- Gerald Eve

- GL Hearn on behalf of Tesco Stores Ltd
- Gleeson Developments Ltd
- Greater London Authority
- GVA Grimley (Planning Consultants)
- Hammerson plc
- Hampshire County Council Pension Fund
- Heaton Planning Ltd
- Hemingford Properties
- Her Majesty's Court Service
- Indigo Planning Ltd
- Jema Property Fund Ltd
- Jones Lang LaSalle
- Kennet Properties Ltd.
- King Sturge LLP
- Kingston Hospital NHS Trust
- Kingston University Students Union
- Knight Frank
- Lancashire Digital Technology Centre
- Level
- Linden Homes
- Littman & Robeson
- London Assembly
- London Concrete
- Longmoore Regeneration Limited
- Malcolm Judd and Partners
- Malcolm Scott Consultants
- Marcus Beale Architects
- Martineau
- Metropolis Planning and Design
- Mineral Products Association
- Mizen Properties Limited
- Mono Consultants Ltd
- Montagu Evans on behalf of Hammerson PLC
- Morley Fund Management
- Nathaniel Lichfeld & Partners
- NHP Leisure Development Ltd on behalf of John Lewis
- Paul Dickinson and Associates
- PB
- Peacock and Smith
- Planning Mineral Products Association Ltd.
- Planning Potential
- PPML Consulting Ltd
- PRC Planning
- PRP Architects
- Quod Planning
- Rapleys LLP
- Redrow Homes
- Regeneration Investments Limited
- Robin Bretherick Associates
- Rolfe Judd Architects
- RPS Planning
- RPS Planning on behalf of Costco Wholesale UK Ltd
- Savills Commercial Ltd
- Savills Plc
- SLR
- Spiritbond
- St George West London Ltd
- Stewart Ross Associates
- Tetlow King Planning
- The Crown Estate
- THE JTS PARTNERSHIP LLP
- The Planning Bureau Limited
- TPAC Ltd.
- Tribal MJP
- Turley Associates
- Universities Superannuation Scheme Ltd.
- Waind Gohil Architects
- Warner Estates
- White and Sons Planning Consultants
- Workspace Group plc

Political

- Kingston Borough Liberal Democrats

Religious Groups

- African Families Support Services
- Ahmadiya Muslim Association
Surbiton
- All Saints Church
- Church Commissioners
- Churches Together in Malden
- First Church of Scientist
- Institute of Tamil Culture
- Islamic Resource Centre
- Kingston and Surbiton District
Synagogue
- Kingston Baha'is
- Kingston Baptist Church
- Kingston Chinese Association
- Kingston Liberal Synagogue
- Kingston Mosque
- Kingston Muslim Association
- Kingston Quakers
- Kingston, Surbiton and District
Synagogue
- New Malden Methodist Church
- Religious Society of Friends (Quakers)
- St Catherine of Siena RC Church
- Surbiton Community Church
- The Korean Church
- United Reformed Church

Residents Association

- Agar House Residents Association
- Alexandra Neighbours Association
- Alpha Road Estate Residents
Association
- Avenue Road Residents Association
- Barnsbury Crescent Residents
Association
- Blenheim Gardens Residents
Association
- Brook Road Residents Association
- Cambridge Road Community
Association
- Canbury and Riverside Association
- Canbury Court Residents Association
- Charter Quay Residents Association
- Chessington Court Residents
Association
- Chessington District Residents
Association
- Chessington Hall Residents
Association.
- Chessington Residents Association
- Clarence Street/ London House Ltd
Residents Association
- Coombe House Estates Residents
Association
- Coombe Ridings Residents
Association
- Cumberland House Residents
Association
- Dengrove Residents Association
- Dysart Avenue Residents Association
- Eaton Drive Householders Association
- Fassett Road Residents Association
- Federation of Kingston Residents
- Federation of RBK Residents
Associations
- FREDY Residents Association
- Greenwood Park Residents
Association
- Groves Association
- Hawks Road Residents Association
- Kingston Society
- Kingston Vale Residents Association
- Knights Park Residents Association
- Korean Residents Association
- Korean Residents Society
- Lower Kings Road Residents
- Malden Rushett Residents Association
- Marlowe House Residents Association
- McDonald House Residents
Association
- Melbourne Court Residents
Association
- Melford Close Residents Association
- Mill Street Residents Association
- New Malden (Beverley Ward)
Resident's Association
- OADRA
- Old Kingston Road Residents
Association
- River Court Residents Association
- Riverside Residents Association
- Rose Walk Residents Association
- Royal Quarter Residents Association
- SCARA
- South Hogsmill Valley Residents
Association
- Southborough Residents Association
- Spring Grove Residents Association
- Surbiton Central Area Residents
Association
- The Alexandra Neighbours
Association
- Tolworth South Residents Association

Transport

- Civil Aviation Authority
- Department of Transport Rail Group
- Freight Transport Association- London and South East Region
- Greater London Motorcycle Action Group
- H R Richmond Ltd
- Kingston Area Travellers Association
- Kingston Cycling Campaign
- Living Streets
- London Buses
- London Buses Network Operations
- London Cyclists
- London General Transport Services Ltd
- London United Busway Ltd
- Richmond & Kingston Accessible Transport
- Road Haulage Association Ltd
- South London Partnership
- South West Trains
- Sustrans
- Transport for London

Young people

- Parents Forum
- Young People's Forum
- Youth Advisory Council

Appendix 2: Responses to the Affordable Housing SPD Consultation

Table 1: Responses from the Public Consultation

The table below sets out all responses received to the public consultation and the Council's response. Any changes to be made to the SPD are included in the final column "RBK Response".

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
1	Mr Steve Donovan	Online	1	Para. 5.5	What this document is basically saying is that if an investor is looking to buy a house to split into flats then if he/she goes over four units then he/she is handing over a large percentage of his portfolio to the council. This is absolutely crazy! How can this be justified? In effect these new rules will bring the small time developer to a complete standstill and will have a serious knock on effect on local suppliers, tradesmen, etc. who depend on these smaller developers. I understand the need for affordable housing and obviously large building firms can allow for such losses but even they cannot legislate for 50% on affordable homes. The result of these new policy changes will have an unbelievable Negative effect on the economy within the borough of Kingston and you really need to think again on these proposals before implementation. Taking this socialistic view will in fact reduce further the number of affordable units in this borough.	The SPD provides further guidance on adopted Core Strategy Policy DM15. The Core Strategy was subject to independent examination by a Planning Inspector and the policy, evidence and justification were found sound. It is understood that applicants may not be able to meet the policy requirements; therefore Policy DM15 states that where proposals depart from policy requirements the applicant will be expected to justify any lower provision through the submission of a financial appraisal. The draft SPD provides additional guidance on this.
2	Mrs Caroline Cheales	Online	2	Para. 4.6	Other London boroughs are questioning this stance as private student accommodation is increasingly lucrative for providers and unaffordable for students. Consider setting an affordability index for the rates charged to students and identifying an appropriate proportion of units to be offered first to students who were previously looked after/in receipt of an income related bursary. Student accommodation cannot be considered a form of affordable housing - the charges are far too high. other councils have justified these conditions and are satisfied that they are within the terms of planning guidance	The SPD does not state that student housing is a form of affordable housing. It is beyond the scope of this SPD to set an affordability index for student rents.
2	Mrs Caroline Cheales	Online	3	Para. 4.7	This policy also states that Addressing these demands [for student housing] should not compromise capacity to	Agreed. The balance between meeting needs for student and

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. the two need to be balanced - particularly in areas with high concentrations of existing student accommodation	conventional housing should be met. The Core Strategy states that there is a need for both. Planning applications for student accommodation will be assessed on their own merits rather than whether there are high concentrations of existing student accommodation.
2	Mrs Caroline Cheales	Online	4	Para. 4.6	Not likely but 'may' be exempt - otherwise the community loses the benefit of affordable housing provided elsewhere, even if the scale and economics of the scheme could support a contribution to affordable housing provision. Student accommodation is touted as the most productive form of property investment and as such shouldn't be treated as such an economic special case. there will be occasions where conditions and provision will be proportionate and appropriate	A recent influx of applications for student housing has required the Council to consider how it can balance the need for market, student and affordable housing.
3	Ms Dina Figueira	Online	5	Para. 5.5	I am writing as a developer in the area and I am extremely worried about this proposal for affordable housing under the 10unit threshold. I have built a few smaller developments now in the Kingston borough and I can tell you that it is so difficult to make a profit on these schemes after buying the property and paying for the architects and builders to get it to sales. What you are now saying is you want to take some of the units I am going to build and give me at best half of the sales price for up to 50% of them so in effect I will have no option but to either close down my company or move to another borough where the rules are realistic. It is just not possible to factor in affordable housing to small scale projects and I would think that you will now end up with even less affordable units in Kingston each year as a result of this policy change. As a matter of fact you will end up with a lot more unaffordable units in the borough because developers will no longer go for planning for flats on a site but probably larger townhouses which will cost	<p>The SPD provides further guidance on adopted Core Strategy Policy DM15. The Core Strategy was subject to independent examination by a Planning Inspector and the policy, its evidence and justification were found sound.</p> <p>The Council understands that applicants may not be able to meet the full policy requirements; therefore Policy DM15 states that where proposals depart from policy requirements the applicant will be expected to justify any lower provision through the submission of a financial appraisal. The draft SPD provides</p>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					twice as much as what ordinary people can afford to pay. This policy change will also be very negative in terms of the local businesses that thrive off these small developments - everyone from the local shops & restaurants to the building merchants rely totally on this business and now I fear a large % of this work will relocate to neighbouring boroughs. I do hope that someone can review this policy and see sense moving forward.	additional guidance on this.
4	Mr Keith Ward	Online	6	Para. 5.5	I'm a property developer in the Kingston upon Thames area. My company is recently new and I've invested a lot of money into the company with up to ten workers working full time for me all from the Kingston area. If this compliance took place it would take a huge toll on both my business and other construction companies in the area . I express my concerns as I'm worried that I might have to move both my home family and my business to another borough as this might be the ruin of my business.	<p>The SPD provides further guidance on adopted Core Strategy Policy DM15. The Core Strategy was subject to independent examination by a Planning Inspector and the policy, its evidence and justification were found sound.</p> <p>It is understood that applicants may not be able to meet the policy requirements; therefore Policy DM15 states that where proposals depart from policy requirements the applicant will be expected to justify any lower provision through the submission of a financial appraisal. The draft SPD provides additional guidance on this.</p>
5	London Fire and Emergency Planning Authority (LFEPA) (Dron & Wright Property	Letter/Email	7	Section 5	We object to the lowering of the threshold relating to affordable housing, from ten units to five units. We consider that this conflicts with paragraphs 173 and 174 of the National Planning Policy Framework (March 2012) relating to viability. This states that 'Plans should be deliverable... (and) should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements ... such as for affordable	The SPD does not act to lower the threshold relating to affordable housing requirements. The five unit threshold is set out in adopted Core Strategy Policy DM15, and this SPD is further guidance. The Core Strategy was subject to independent examination by a Planning Inspector and the policy,

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
	Consultants)				housing... should... provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.' We believe that lowering the threshold requirement for affordable housing will conflict with these policies and therefore suggest that they remain as they currently stand.	its evidence and justification were found sound.
6	English Heritage	Letter/Email	8	General comment	We have considered the proposed SPD in the context of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Having done this, English Heritage has no recommendations for amendment at this time.	Comment noted.
7	Natural England	Letter/Email	9	General comment	The consultation which we have been offered the opportunity to comment on is of a low risk/priority for Natural England and so we will not be offering representations at this time.	Comment noted.
8	Kingston Borough Labour Party	Email	10	Para. 2.1-2.3	The Common Housing Register is a useful measure of housing need but may underestimate real demand.	Other evidence base is also noted in Para 2.2, i.e. the Strategic Housing Market Assessment (2009), which provides an indication of need in the Borough.
8	Kingston Borough Labour Party	Email	11	Para 4.8 and elsewhere	We agree with the presumption of on-site delivery.	Support is noted.
8	Kingston Borough Labour Party	Email	12	Para 5.7	We agree with the proposal to lower the threshold from 10 to 5 units.	Comment noted, however, to clarify the SPD does not propose lowering of the threshold. The adopted Core Strategy Policy DM15 sets the threshold at five units and this SPD is further guidance.
8	Kingston Borough Labour Party	Email	13	Para 5.9	"...local evidence suggests that the need in the Borough is for 75% social rented and 25% intermediate." We suggest that the criterion of need is used rather than the	The Council's policy has been agreed with the GLA and forms part of the Core Strategy which

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					70:30 split proposed.	was found sound at independent examination by a Planning Inspector.
8	Kingston Borough Labour Party	Email	14	Para 5.9	Concerns on possible loopholes through which developers may escape the threshold at which developers will be expected to provide affordable housing. Developers may try to evade site thresholds, either by lowering densities, by phasing development, by submitting subsequent applications on the same site, or by the incremental acquisition of sites.	Comment noted. The Development Management process is aware of this possibility. Applicants will be challenged where it is apparent that the policy is being evaded.
8	Kingston Borough Labour Party	Email	15	Para 5.9	Artificial splitting of sites / Underdevelopment of sites We are concerned that a developer could artificially split a site. A site of 8 units would yield 3 affordable units but two sites of 4 units would yield none. For example, a developer might sell part of the site to a legally separate entity in an attempt to evade the obligation to provide affordable housing. The SPD should contain an explicit statement, such as those made by other councils. For example: "Schemes will be refused, where as a means of avoiding affordable housing provision, a development site is intentionally sub-divided or is not developed to its full potential." Ashfield District Council http://www.ashfield-dc.gov.uk/wordpress/policy-hg3-affordable-housing/#4 "Where, as a means of avoiding the requirement to provide affordable housing, a proposed development site is subdivided so as to be below the site size threshold, or is not developed to its full potential so as to be below the number of dwellings threshold, planning permission will be refused." Spelthorne Borough Council: www.spelthorne.gov.uk/CHttpHandler.ashx?id=1636&p=0 Several other councils have made similar provisions.	Comment noted. The Development Management process is aware of this possibility. Applicants will be challenged where it is apparent that the policy is being evaded. The SPD has been produced to guide existing Core Strategy policy. New policy cannot be introduced in SPD and therefore the proposed text cannot be incorporated.
8	Kingston Borough Labour Party	Email	16		Partitioning There is some concern regarding the possibility that a developers might choose to build, for example, 4 large	Comment noted. The Development Management process is aware of this possibility.

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					homes prepared for easy partition. Although we recognise that the SPD notes that the full capacity of a site to accommodate housing should be considered by officers as part of their scrutiny of any planning application, this is not entirely satisfactory. The SPD should make clear, and RBK should empower officers to ensure that in the event of a suspicion that sites have been brought forward with the intention of subverting the new 5-unit threshold, that 4-unit developments cannot be easily partitioned after build. We understand that this could potentially take the form of a covenant, or an addition within any legal agreement but the matter requires and warrants further exploration.	Applicants will be challenged where space standards appear inappropriate.
9	Friends of Kingston Museum & Heritage Service	Email	17		No comment.	Comment noted.
10	GLA - Housing & Land	Email	18	Para. 3.6	Thank you for consulting us on the draft affordable housing SPD. The document purports to adopt a 2005 GLA figure of £30,085 for gross maximum household salary. A lot has changed since then & the GLA's current First Steps figures are outlined at http://www.london.gov.uk/priorities/housing/affordable-housing/london-variations-AHCFG : £64,300 when applying for 1 or 2 bedroom properties £77,200 when applying for 3 or more bedrooms. The draft London SPG (http://www.london.gov.uk/sites/default/files/spg-housing-draft.pdf) says: "This range is published annually in LP Annual Monitoring Reports to reflect changes in lower quartile house prices. For households which require no more than two bedrooms it is currently £19,000 - £64,000, and for households requiring more than two bedrooms the upper limit is £74,000."	It is noted that the GLA's affordability figures are higher and apply London-wide. However, Kingston is required to meet its local need which is lower, and evidenced by the SHMA and applicants seeking home ownership in the Housing Register. Therefore the affordability levels in the SPD remain set at £30,035.
11	Jane Young	Email	19		I can see no reference in the text to the requirement to construct all homes to Lifetime Homes standard and 10%	Lifetime Homes standards are applicable to all homes, not just

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					of homes to wheelchair standard. Whilst these requirements may be clear in other parts of the planning policy framework, they should be stated here for the avoidance of doubt.	<p>affordable housing. The standards reflect London Plan Policy 3.8 and Core Strategy Policy DM13 and these policies are expanded upon in the Council's Residential Design SPD, as this is considered more appropriate.</p> <p>Change: A paragraph will be added to Section 2 of the Affordable Housing SPD referencing Policy DM13 and the need for the high quality design of affordable housing with respect to Lifetime Homes and wheelchair housing standards. Reference will also be added to the Mayor's Housing SPG, the Council's Residential Design SPD, and Lifetime Homes and Wheelchair Housing Supplementary Planning Advice Note.</p>
11	Jane Young	Email	20		In the chapter on the mix required, mention should be made of the need to agree the mix of wheelchair homes required with the borough's housing department and occupational therapists.	<p>The purpose of this SPD is to set out policy on affordable housing, therefore it is more appropriate to detail policies on wheelchair homes in the Residential Design Guide SPD.</p> <p>Change: Reference will be made to wheelchair housing and design standards in Section 2 of this SPD.</p>
11	Jane Young	Email	21	Annex 4 Para 11	In Annex 4, page 37, paragraph 11 of the schedule, the drafting appears strange and confused - Lifetime Homes standards are not relevant to wheelchair housing but to all homes!! The relevant design guide for wheelchair housing is the Wheelchair Housing Design Guide (2nd edition) 2006 or later edition if applicable. I recommend	<p>Agree that Lifetime Homes standards are relevant to all homes.</p> <p>Change: Agreed to remove the second part of the sentence "such</p>

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					the removal of references to the lifetime homes standards in this particular section/paragraph, as it should be referenced in relation to the required design of all homes in the development (see first point above).	standards shall include..." from Annex 4, page 37, paragraph 11.
11	Jane Young	Email	22		When I worked for Kingston I recall a great many discussions about how to get the occupational therapists working with the developers at an earlier stage so wheelchair units in affordable housing could be properly prepared for the first occupant; this is mainly because kitchen design depends on whether or not the wheelchair user is the main producer of meals and bathroom/shower room design often depends on the exact needs of the occupant. If the outcome of these discussions is not reflected in this SPD it is a missed opportunity!	Lifetime Homes standards are applicable to all homes, not just affordable housing. The standards reflect London Plan Policy 3.8 and Core Strategy Policy DM13. The policy approach is detailed in the Residential Design Guide SPD. A reference will be added to the Residential Design Guide SPD.
11	Jane Young	Email	23		It is so important to take all opportunities to ensure affordable housing, which is so vital for disabled people, is designed properly - 100% to Lifetime Homes standards and 10% to wheelchair standard. After all, we have an aging population and more and more people are surviving with serious disabilities, and housing is built to last up to about 100 years, so it needs to be designed correctly to begin with.	Agree that housing for disabled people should be designed properly. The policy on Lifetime Homes and wheelchair standards is detailed in the Residential Design Guide SPD. Change: Reference to relevant policy guidance will be added to Section 2.
12	Gresham House plc (Rapleys)	Letter/Email	24	General comment	We note that the draft SPD develops and elaborates upon the Council's existing planning policy in respect of affordable housing, as well as relevant sections of the London Plan. We note that the document makes allowance for off-site provision and payment in-lieu of provision, under certain circumstances, which is welcomed.	Support is noted.
12	Gresham House plc (Rapleys)	Letter/Email	25	General comment	Further, the draft document recognises that affordable housing provision on individual development sites can be informed by viability issues in terms of the proportion, housing mix and tenure split. Again, this is welcomed.	Support is noted.

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12	Gresham House plc (Rapleys)	Letter/Email	26	Page 24	It is noted on page 24 that the price paid, or agreed to be paid, for a site will be regarded as of little relevance, unless it can be demonstrated that the price reflects all relevant planning policies and requirements at the date of the appraisals submitted. However, value should be given due consideration in any event, as it is a critical part of the approach in determining whether a site is viable. Further, it assists with benchmarking land values for comparable schemes (not least as an indicator of the state of the market). The SPD should be amended to reflect this.	Disagree with proposed amendment. The financial implications of complying with the affordable housing policy need to be factored into the land value when purchasing a site. If no regard is paid to these implications the resultant financial consequences will have to be borne by the developer.
13	Cllr Ken Smith	Email	27	Para. 5.16	As set out in the 2007 SPD Para 5.16 should clarify that "The financial implications of complying with the affordable housing policy need to be factored into the land value when purchasing a site. If no regard is paid to these implications the resultant financial consequences will have to be borne by the developer."	Change agreed. Para 5.16 will be amended to clarify that "The financial implications of complying with the affordable housing policy need to be factored into the land value when purchasing a site. If no regard is paid to these implications the resultant financial consequences will have to be borne by the developer."
14	Oakhill and District Residents Association	Email	28	Annex 1	The problem with Policy DM15 set out in Annexe 1 is that gives a justification through the submission of a financial appraisal for a lower provision of affordable housing. The SPD should make it clear that there is a strong presumption AGAINST any such submission	Annex 1 reiterates Core Strategy policy to which this SPD supports.
14	Oakhill and District Residents Association	Email	29	Para. 2.2	Section 2.2 of the SPD gives rise to concern whether the Council has identified the land which will allow these houses to be built.	Para 2.2 sets out housing need as evidenced by studies undertaken in the Borough. The identification of land is beyond the scope of this SPD.
14	Oakhill and District Residents Association	Email	30	Para. 2.3	Section 2.3 of the SPD says the Council has identified detailed information on the housing need in the Borough. Who are these people: for example, are they currently on the housing need register?	Housing need has been assessed by an analysis of the Council's housing need register, and the Strategic Housing Market Assessment.

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14	Oakhill and District Residents Association	Email	31	Para. 3.9	Section 3.9 of the SPD talks of people stair casing to buy their own homes. However, where does the new land come from to enable the new people to come onto the ladder? Surely it would be better for the onus to be on the people who now want to buy their own homes to find the property – not for the Council to have to do the search.	Comment noted. This is beyond the scope of the SPD.
14	Oakhill and District Residents Association	Email	32	Section 5	Section 5 – how does this relate to the “Police Federation” site?	This comment relates to a specific planning application and is beyond the scope of the SPD. Previous affordable housing policy would have been relevant.
14	Oakhill and District Residents Association	Email	33	Para. 6.1	Section 6.1 is very dangerous. It does not define what “exceptional circumstances” mean it allows the developer to give money to the Council rather than build. What does the Council do with the money? Do they find other sites prior to accepting the money and organise building of affordable housing? If not the proportion of affordable housing is going to drop below the requirements.	Para 6.1 is an extract of adopted Core Strategy Affordable Housing Policy DM15. Funds are directed to housing projects, examples of which are detailed in Para 6.9.
14	Oakhill and District Residents Association	Email	34	Para. 6.3	In particular, in Section 6.3 first dot point, how does the Council decide a site is an “unsuitable location for affordable or family housing”?	Comment noted. The criteria for assessing the suitability of sites relates to viability, provision of open space and other contextual factors.
14	Oakhill and District Residents Association	Email	35	Para. 6.3	In the second dot point does the Council find the alternative sites and arrange for building before accepting the money? The way is open for malpractice.	The Council has a list of affordable housing projects on which financial contributions would be spent. Examples of these projects are detailed in Para. 6.9.
14	Oakhill and District Residents Association	Email	36	Para. 6.6	In Section 6.6 of the SPD allowance is made for affordable housing percentage to be adjusted downwards until the scheme becomes viable. There should not be this alternative. How is the scheme going to be judged? What appeal procedure is there if the decision goes against the developer?	The Core Strategy Policy DM15 states that the policy requirement should be met unless it can be demonstrated through a financial appraisal that the development would be unviable. Viability is determined through the Development Management

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						process and negotiation including criteria relating to financial, economic and other contextual factors.
14	Oakhill and District Residents Association	Email	37	General comment	The SPD is too wide open with if's and but's. The policy should be hard and fast if there is truly a housing problem which the Borough HAS to solve.	Not agreed. Guidance is based on adopted policy.
14	Oakhill and District Residents Association	Email	38	General comment	1. The consultation period is once again too short for two complex documents sent out at the same time.	Not a technical comment on the Affordable Housing SPD.
14	Oakhill and District Residents Association	Email	39	General comment	2. Once again a consultation document is sent out in the run up to Christmas when many people have not the time to study it in detail	Not a technical comment on the Affordable Housing SPD.
14	Oakhill and District Residents Association	Email	40	General comment	3. This is not a true consultation but a legal ploy to rush through additions to the Policy Framework. Presumably our Councillors, who should be in charge, are silent. A true consultation would have given individuals and Residents' Associations the opportunity to have met with Officers and Councillors for them to run through the proposals, take questions and discuss the matters under consideration. Perhaps it is still not too late!	The public consultation was undertaken in line with The Town and Country Planning (Local Planning) (England) Regulations 2012. The SPD was reported to each of the Council's four Neighbourhood Committees as part of the consultation process.
14	Oakhill and District Residents Association	Email	41	General comment	4. It is written in language which may be easily understood by Officers of the Council but is much more difficult for people not au fait with the terminology used. Also the language is quite verbose and convoluted. This is especially true of the Transport SPD.	The SPD is necessarily technical guidance for potential developers and applicants. A pre-application advice service is offered for applicants who may be unsure of the policy requirements of the SPD.
14	Oakhill and District Residents Association	Email	42		5. How many people have downloaded the documentation?	Not a technical comment on the Affordable Housing SPD.

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15	Paragon Community Housing Group (Tetlow King)	Letter/Email	43	Section 1	Section 1 – Introduction We support the councils overarching aim within the document to provide greater clarity and certainty particularly in terms of: 1. The planning process leading to submission of a planning application; 2. when the affordable housing policy applies 3. the proportion of affordable housing sought in private schemes; and 4. the expected affordable housing dwelling mix (size, type ,and tenure)	Support is noted.
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	44	Section 2	Section 2 – Background: Housing Need Policy Context Paragraph 2.3 p.2 sets out that during 2011 the Council's Common Housing Register was also analysed to establish detailed information on housing need in the borough. It then goes on to note that this helped to inform the affordability assessment levels set out in Section 3. No further information is included in relation to this and to what extent this information has been relied upon to form the intermediate rent levels. As a registered provider within the Borough, the affordability assessment levels set out in section 3 are extremely important to the way that we operate and our ability to provide affordable housing and negotiate with developers. No further information on how these figures have been derived has been provided as part of the SPD and we would like the opportunity to analyse this information (Please see section 3 for further comments).	Not a technical comment on the Affordable Housing SPD. Any enquiries for further information may be considered.
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	45	Section 3	Section 3 – What is Affordable Housing It is noted the affordable housing definition draws on the NPPF definition in part, but in the interest of avoiding confusion, it is recommended the definition of reflects exactly that in the NPPF. To ensure further clarity we believe that the council should provide further guidance in the approach for developers (Affordable Rent) as opposed to referring to a	Change: Agreed definition of affordable housing will be amended to reflect the NPPF definition. Affordable rent comment is beyond the scope of the SPD.

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					<p>separate document (Housing Strategy 2011- 15).</p> <p>Further to the above, we believe that RPs should be notified and given the opportunity to comment on any proposed changes to the position statement on affordable rent and that this intention should be stated within the revised SPD.</p>	
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	46		<p>Intermediate rent definition The Intermediate Rent definition is not in full conformity with the NPPF. The NPPF does not specify that the cost to the occupier is significantly below the maximum affordability levels. The NPPF is specific in that intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition.</p>	Change: Agreed to amend the definition of intermediate rent to be in conformity with the NPPF.
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	47	Table 1, Page 5	<p>Affordability Criteria – Intermediate Housing Whilst we understand that there is a pressing issue of keeping intermediate rents to an affordable level, by setting a blanket rate to which RPs have to adhere to could lead to the diminution of affordable housing provision in the borough. Whilst we note that this table formed part of the old SPD the current situation in relation to the extent of government grants has changed considerably. We have two main concerns in relation to Table 1 and its application.</p> <p>1. If a rate is set, this limits the ability of any RP's which operate in the borough to negotiate a price for the units from the developer which will make the scheme viable. This offer or indeed lack of any offer due to viability on the RP's part could then lead to the developer carrying out an Economic Viability assessment demonstrating that they cannot feasibly provide affordable units onsite.</p> <p>2. The levels set out in Table 1 reflect levels in 2011 and appear to be unchanged from those in the previous SPD. By the time that this SPD is adopted by the council, the</p>	<p>Do not agree. The main issue in Kingston is capacity and the lack of sites available for affordable housing.</p> <p>From the experience of the Council's Housing department Partner Registered Providers have been able to achieve the affordability criteria, including Paragon.</p> <p>The affordability assessment levels do reflect the current affordability levels in Kingston, as</p>

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					<p>levels will already be 2 years out of date. At what point are the levels going to be revised to reflect the current affordability levels within Kingston? By setting these fixed rates which are not linked to current affordability levels, means that the figures will not reflect true affordability levels and consequently having a negative effect on the number of affordable units which are built within the borough.</p> <p>We do welcome that the council have offered some flexibility in this policy by noting that “at the discretion of the Head of Housing, depending on the circumstances of each case, the Council may agree to vary these in exceptional circumstances. Applicants are encouraged to engage early with a Partner Register Provider so that cost to occupier considerations can inform discussions with the Council on schemes on scheme viability.” However, there are no examples of what exceptional circumstance may vary the levels.</p>	<p>explained in the footnote on Page 5.</p> <p>Each scheme will be assessed on its own merits.</p>
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	48	Section 4	<p>Section 4 -When does the affordable housing policy apply? We support section 4 and the instances in which the affordable housing policy will apply.</p>	Comment noted.
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	49	Section 5	<p>Section 5 - And determining the proportion and mix of affordable housing on a site We agree that developer should look at reduce land value and or reducing costs so can provide affordable housing, prior to sale or acquisition of a site and furthermore support the sliding scale set out in para 5.5 and that the calculation will be based on gross numbers in the development.</p>	Support is noted.
15	Paragon Community Housing	Letter/Email	50	Para. 5.9	<p>The mix of affordable homes Paragraph 5.9 seeks to achieve a split of 70:30 between social/affordable rented and intermediate provision. We</p>	The 70:30 tenure split forms part of the requirement of Core

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	Group (Tetlow King)				<p>welcome that the council have applied flexibility using the wording seeks. The council should be flexible in the determination of tenure split and should be guided by the RP in individual cases.</p> <p>We commented on the planning obligations SPD in 2011 and noted that there was no information given on the mix of homes required and that the council should seek to ensure any affordable housing goes towards meeting the requirements of the borough.</p> <p>We recommended that there should be a statement which affirms that developers should discuss mix with RPs and the housing department at an early stage in the development process.</p> <p>Whilst we welcome the table on page 5 which sets out the dwelling mix required, as this adds a degree of certainty to both developers and RPs, there will be some sites that may be incapable of providing the quantity of family homes with 3 or more bedrooms. We would like to see more flexibility within this table to meet changing circumstances over time, and details, set out, of how the policy will be updated to reflect changes over time. We believe that there should be a reference to the experience and advice of RPs being an important consideration in the determination of an appropriate mix on individual sites.</p>	<p>strategy Policy DM15 Affordable Housing. This policy was informed by sound evidence and tested by a Planning Inspector at the Examination in Public into the Core Strategy. Registered Providers will be involved in discussions with the Council and Para 5.15 already strongly states that “Applicants are advised to discuss their scheme with the Council at pre-application stage to agree the proportion and mix of affordable dwellings prior to submitting a planning application.” An additional sentence will be added to Para 5.15 to state: “The Council also encourages applicants to engage at an early stage with a Registered Provider.”</p> <p>The Table on Page 10 is for guidance and allows for negotiation.</p>
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	51	Para. 5.11	<p>We welcome paragraph 5.11 which notes that: The council will not accept a reduced proportion of affordable family homes with 3 or more bedrooms on sites where this could clearly be achievable. However, we do not think that this paragraph proffers enough flexibility to RPs where they are dealing with constrained sites. The term ‘clearly be achieved’ is ambiguous. We suggest that this paragraph should be changed to: "The council will seek the dwelling mix set out in the</p>	<p>Agreed change. As suggested, Para 5.11 will be amended to read: “The council will seek the dwelling mix set out in the above table and where sites cannot provide the required mix the council will work with the Registered Provider to</p>

ID No.	Respondent	Response Method	Comment No.	Document Ref.	Comment	RBK Response
					above table and where sites cannot provide the required mix the council will work with the RP to secure a mix which both meets the needs of the borough within the constraints of any new development site."	secure a mix which both meets the needs of the borough within the constraints of any new development site."
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	52	Para. 5.12	We welcome that the council is going to be flexible on the tenure mix on sites where there are 6 or fewer affordable units, taking into consideration the view of its partner Registered Provider. However, we believe that this does not go far enough and should occur on all sizes of sites, not just those which are 6 units and below.	Disagree. It is likely that large sites will be able to accommodate the policy defined tenure mix more readily.
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	53	Para. 5.13	<p>We welcome the council's recognition, in paragraph 5.13, that different sites will pose different design challenges in terms of providing family accommodation, especially on sites suited to developments of flats. We do agree that in some circumstances it will be possible to provide family accommodation at ground level, but in most cases this will not result in the mix as set out in the table on page 5. The provision of amenity space is a key consideration. However, issues such as the impact of higher parking provision for 3 bed and above units must also be taken into consideration. When considering competing policies the provision of affordable family units should be the stated priority in the balancing exercise.</p> <p>We think it would be beneficial that within paragraph 5.15 it notes that the council encourages applicants to engage, at an early stage, with an RP.</p>	<p>Agreed change. As suggested, Para 5.15 will be amended to state:</p> <p>"The Council also encourages applicants to engage at an early stage with a Registered Provider."</p>
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	54	Section 6	<p>Section 6 – Off-site provision and payments in-lieu</p> <p>We support that off-site provision will only be considered in exceptional circumstances. Another example of where it can be beneficial is where the off-site solution can provide more affordable housing than on site. For example, in a case where viability for a development shows on site delivery can only provide 10% affordable housing, but off site could provide 25% affordable housing, there is a clear benefit in providing the off-site</p>	Support is noted.

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					affordable housing.	
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	55	Para. 6.9	We support that monies and contributions collected will be ring fenced to secure efficient delivery of new affordable housing.	Support is noted.
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	56	Para. 7.3-7.6	Section 7 – Pre-application Discussions PCHG support paras 7.3 – 7.6, and welcome developers to contact them regarding any potential partnership in delivering affordable housing for their scheme.	Comment noted.
15	Paragon Community Housing Group (Tetlow King)	Letter/Email	57	Glossary	Glossary As above, the definition for affordable housing should be in conformity with the NPPF definition, along with the definitions for Affordable Rent, Social Rented Housing and Intermediate Housing.	Change: Agreed to amend the definition of affordable housing to be in conformity with the NPPF.

Table 2: Comments from Neighbourhood Committees

Committee Meeting	Document Ref.	Comment No.	Comment	Officer response
Kingston Town Planning Sub Committee	General	58	Members were supportive of the draft SPD and welcomed any approaches which would enable the greater provision of affordable housing in the borough. Young professional people are currently experiencing considerable difficulty meeting market rents for property.	Support is noted.
	General	59	It was considered that in Kingston, an area of high house prices, viability for affordable housing provision should be good. It was, however, also noted that developers report high land costs and cite this as a reason for not being able to make provision for affordable housing.	Comment noted.
	Para. 6.6	60	Concern was expressed at the inclusion of para 6.6 (page 14) of the draft SPD.	This paragraph is an extension of Policy DM15 and is flexible to ensure that some affordable housing can be achieved if the applicant can demonstrate an unviable position.
	Para. 2.2	61	Members welcomed that the current target of 2000 homes by 2026 was likely to be revised up with increasing need and that the formulaic detail would be simplified.	The target for new affordable homes is taken from the Council's adopted Core Strategy Policy DM15, which states that <i>at least</i> 2000 new affordable homes will be delivered over the 15 year life span of the Core Strategy and cannot be amended in the SPD.
South Of The Borough Neighbourhood Committee	Section 1: Introduction	62	A fuller and more detailed explanation of the need for affordable housing, and the impact on the local authority if there is insufficient affordable housing, should be provided in the Introduction to the document.	Change: An explanation of the Borough's population and need for affordable housing will be provided in Section 1.
	General	63	The document should provide a strong basis for the Council to take into account previous developments by a developer to prevent developers being able to avoid providing affordable housing by splitting developments into separate applications. Over- development of backland sites is a particular problem.	Comment noted. The Development Management process is aware of this possibility. Applicants will be challenged where it is apparent that the policy is being evaded.
	Para. 5.15	64	The document should also provide a strong basis for officers to negotiate robustly when developers submit viability assessments to try to reduce the affordable housing provision. The emphasis in para.	Comment noted.

Committee Meeting	Document Ref.	Comment No.	Comment	Officer response
			5.15 on pre-application discussions is welcomed.	
	Para. 5.9	65	The mix of affordable homes set out in para 5.9 was welcomed to reflect the need in the borough. One example of this need is that there are now increasingly children of RBK residents who can't afford to live in the same borough as their parents.	Comment noted.
	Para. 5.9	66	It was noted that the occupancy levels in affordable housing set out in para 5.9 in relation to the size of property are maximum occupancy levels not recommended occupancy levels.	Comment noted.
	General	67	For consultation documents labelled as 'draft', it should be made clear that much of the content is already required under current policy so should not be taken by developers as being currently optional.	The SPD refers to the adopted Core Strategy policy on affordable housing (Policy DM15) which is currently applied.
	General	68	It was noted that standards for housing developments will be set out in a Residential Design Guide Supplementary Planning Document which will be submitted to the Committee in March.	Comment noted.
Surbiton Planning Sub-Committee	General	69	Members emphasised the need for affordable housing in the Neighbourhood and welcomed the SPD's intentions and values.	Support is noted.
	Page 9	70	Some Members expressed the concern that the admirable intentions of the document could potentially be undermined by developers subdividing plots into unit sizes which are smaller than the minimum 5 unit threshold, as detailed on page 9 of the document, in order in order to escape any requirement to provide affordable housing.	Comment noted. The Development Management process is aware of this possibility. Applicants will be challenged where it is apparent that the policy is being evaded.
Maldens And Coombe Planning Sub-Committee	General	71	The SPD for affordable housing is supported	Support is noted.