

Dover District Council

Affordable Housing Supplementary Planning Document (SPD)

Regulation 12(a) Consultation Statement



June 2026

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1 Introduction

- 1.1 The Affordable Housing Supplementary Planning Document (SPD) provides additional guidance on the implementation of the adopted Local Plan policies, including Policy SP5 – Affordable Housing and H2 – Rural Exception Sites.
- 1.2 This Consultation Statement for the SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, including:
- Regulation 12 (a) - Prior to the adoption of an SPD, a local planning authority must prepare a ‘consultation statement’, setting out who they consulted when preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.
 - Regulation 12 (b) - When seeking representations on SPDs the local planning authority must make copies of the consultation statement and the SPD available for a period of not less than 4 weeks, together with details of the date by which representations must be received (Regulation 13) and the address to which they must be sent.
 - Regulation 35 (1) (a) and (b) – Documents are required to be made available for inspection at the district council’s principal office and such other places within the district as the council consider appropriate, during normal office hours, and published on the district council’s website.
 - Regulation 35 (3) (a) - The council may cease to make the document available once the 3 months period after the day on which the SPD is adopted has expired.

Note: *It is acknowledged that the Town and Country Planning (Local Planning) (England) Regulations 2012 have been superseded, however, the relevant regulations remain force for the adoption of Supplementary Planning Documents up to 30th June deadline, as set out in [The Levelling-up and Regeneration Act 2023 \(Commencement No. 11 and Saving and Transitional Provisions\) Regulations 2026](#).*

Statement of Community Involvement

- 1.3 The [Statement of Community Involvement 2025 \(SCI\)](#) sets out how the council will consult and involve people in the preparation of Local Plans and other planning documents, including SPDs.

- 1.4 The SCI states that the initial stage in preparing an SPD comprises the gathering of evidence and ideas and the consideration of alternative approaches. At this stage, the council will consult with those individuals and bodies who are relevant to the successful implementation of the SPD and may consult more widely if it is considered relevant and appropriate to do so. The method of engagement will depend on the type of SPD, but the Council will consider using correspondence by letter or email, workshops or focus groups, meetings or drop in events.
- 1.5 Following early engagement, a minimum 4-week public engagement exercise must be undertaken, which is published online, available at libraries and contain information on how comments can be made, with direct notifications to statutory consultees and relevant stakeholders. This must be accompanied by a consultation statement outlining the earlier engagement and how comments made at that stage were addressed.
- 1.6 Consultation on the Affordable Housing SPD has been carried out in accordance with the Statement of Community Involvement 2025. This report sets out those details.

Data Protection

- 1.7 In undertaking public consultation, the council must act in accordance with the requirements of the general data protection regulations (GDPR). The data collected will be used to produce this SPD. Contact information will be held securely and confidentially and may be used to contact the respondent regarding their comments. The Corporate and Planning Policy Privacy Notices can be viewed via the following link: www.dover.gov.uk/privacy.

2 Initial Stakeholder Engagement

- 2.1 The intention to prepare an SPD for Affordable Housing is set out in the [Local Development Scheme 2025](#).
- 2.2 During the initial preparation stage, the district council undertook two aspects of initial stakeholder engagement. Firstly, with internal DDC staff in the planning and housing teams. This was held between 15 May 2025 and 20 June 2026. These workshops raised the following issues for further consideration:
- Whether changes in the 2024 NPPF in relation to tenures and First Homes minimum requirements require some flexibility in applying Policy SP5
 - Whether the off-site contribution calculator was delivering appropriate funds for the housing team to provide affordable units elsewhere in the district
 - Whether the SPD could set out requirements to encourage early engagement on affordable housing issues and add clarity to local plan and national requirements.
 - Whether the SPD could add include information on rounding of 30% and M4(3) units
 - Whether the SPD could include cascade mechanism or standard S106 wording
- 2.3 Secondly with invited external stakeholders that included local developers and Registered Providers of Affordable Housing. A full list of invited participants can be found ([Appendix 4](#)). This was held between 3 December 2025 and 12 January 2026.
- 2.4 This was to inform the proposed scope, structure and content of the SPD. A brief engagement document was prepared, setting out relevant local planning ([Appendix 1](#)), alongside Frequently Asked Questions ([Appendix 3](#)). The engagement document was accompanied by an online questionnaire ([Appendix 2](#)).
- 2.5 Six responses were received. [Appendix 5](#) includes the full comments from each respondent. Summaries of the main issues identified and how these have been addressed and informed the content of the draft SPD are set out in Table 1 below.

Table 1 – Summary of Stakeholder comments and how these were addressed in the Draft SPD

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
1. Tenure Mix		
1a – Should the SPD set out flexibility in the requirement for First Homes following the NPPF amendment?	Strong support with 5 of 6 responses answering ‘yes’	Guidance Note 2 in the draft SPD adds flexibility to tenure mix of SP5 taking into account the 2024 NPPF and allows for the quoted tenure mix options at 1c to be provided without the need for a viability appraisal to be submitted, only in circumstances where 30% is being provided on-site.
1b – Should the SPD set out different tenure mix options that would be supported without the need for a viability appraisal?	All responses stated ‘yes’	
1c: Do you agree that the following tenure mix options should be supported without the need for a viability appraisal? <ul style="list-style-type: none"> • 55% Affordable/social rent and 45% SO • 55% Affordable/social rent, 25% SO and 20% other HOP 	All responses stated ‘yes’	
Q1d & 1e: Are there other tenure mix options that should be supported without the need for a viability appraisal?	Five respondents suggested <i>greater flexibility</i> in tenure mixes to improve deliverability. <p>1. It should include Discount Market Sales</p> <ul style="list-style-type: none"> • A split of 55% Affordable/Social Rent and 45% other home-ownership products (including Discounted Market Sale) was suggested. 	The policy and tenure mix options allow for DMS to be provided under ‘other home ownership products. In cases where applicants wish for DMS to form a higher percentage of units than this or any cases

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
	<ul style="list-style-type: none"> • First Homes are a type of DMS, substituting them with other DMS products would be effectively equivalent • In some circumstances, 100% Discount Market Sale should be allowed on small sites where no RP is willing to take units, <p>2. Allow Variations When Supported by an RP</p> <ul style="list-style-type: none"> • If a Registered Provider (RP) and the Housing Manager agree, small changes to the mix (e.g., 60/40 or 50/50) should be permitted without requiring a full viability review—especially where this would help unlock delivery. <p>3. Circumstances Allowing High Home Ownership Proportions</p> <ul style="list-style-type: none"> • 100% Shared Ownership (or similar products) where it helps maintain scheme viability. • 75% Shared Ownership / 25% Affordable or Social Rent to help marginal schemes proceed. • 60% Shared Ownership / 40% Affordable or Social Rent as a balanced option where viability is sensitive. <p>4. Flexibility on First Homes</p> <ul style="list-style-type: none"> • 0% First Homes should be acceptable 	<p>where less than 55% rent is proposed, guidance note 2 includes some additional flexibility to tenures where 30% is being met on-site (any tenure mix considered) on a case-by-case basis whether a viability appraisal or other evidence is required, taking into account the views of the housing department in relation to how the proposed mix meets local needs. However, the applicant will need to demonstrate that it has sought to maximise the provision of affordable/social rent and shared ownership tenures. This flexibility allows for 0% First Homes and DMS, if evidenced and agreed. In addition, Guidance Note 4 addresses sites where practicality issues may be causing non-delivery and in this scenario, Discount Market Sales homes will also be considered.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
Q1f: Please provide any other comments relating to the tenure mix requirements of Policy SP5.	<p>Respondents emphasised the importance of flexibility in tenure mix within the SPD, particularly reflecting the practical needs of Registered Providers (RPs) and the viability challenges of local schemes. These are responded to above.</p> <p>Engage directly with Registered Providers during the SPD's preparation to understand their preferred tenure mixes and delivery requirements.</p>	Direct engagement with the RPs operating in the district was undertaken, although no responses received and is planned again as part of the formal consultation period.
2. Mix of unit types and sizes		
2a & 2b Should the SPD set out guidance on the relationship between Policies H1 and SP5, and how the housing mix should be informed by local affordable housing need in the early stages of a schemes design? Add	<p>Five respondents supported providing guidance on affordable housing mix, with several key themes:</p> <ul style="list-style-type: none"> • Respondents suggested including regularly updated information, such as links to updated SHMAs, to reflect differences in housing needs across local areas. • The guidance should set expectations that mixes should meet affordable housing need, while also acknowledging changing market conditions (e.g., interest rates, incentives, stamp duty). Because market dynamics shift faster than policy evidence bases, the mix should be treated as a target or guide, not a rigid requirement. 	In response to matters raised, Guidance Note 3 in the draft SPD advises on housing size, layout and design of affordable units. As suggested it includes links to the evidence documents in relation to bedroom sizes required from the SHMA and references housing needs surveys. It makes clear that context location and market demand will also be taken into account, as requested. It takes forward the approach recommended to liaise with housing dept early in planning

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
	<ul style="list-style-type: none"> • Early dialogue between applicants, the housing team and RPs was strongly encouraged • Respondents stressed avoiding a “one size fits all” approach. Housing mix should reflect: <ul style="list-style-type: none"> ○ the scheme’s context, ○ the type of site (village, suburban, urban), ○ the overall unit mix of the development. Monitoring delivery across the plan period is better than imposing strict site-by-site rules. <p>‘No’ Response</p> <ul style="list-style-type: none"> • The SPD should stick to Policy SP5 and avoid repeating or expanding on housing mix matters already covered by Policy H1, which has been examined and found sound. • RPs’ views on tenure mix and layout should carry significant weight, especially where these differ from planners’ more idealistic preferences. 	<p>process on these matters, as they can assist with delivery.</p> <p>Although not supported by all respondents, the note does re-iterate policies in the Local Plan such as H1 and PM2 in relation to ensuring space standards and building regulations are achieved and clarifies that M4(3) requirements will be rounded to nearest whole number to add clarity.</p> <p>In response to the comment about RP views, the note adds some flexibility in terms of tenure blind developments, allowing for clustering of units such as flats, where this aids management.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
3. Viability Issues		
Q3a: Should VA include requirements to compare and contrast assessment against LP viability report	5 responses agreed with this approach	Guidance Note 5 in the draft SPD sets out requirements for what Viability Appraisals should include. All those listed in the options were taken forward in the note. Links have been provided to the Local Plan viability evidence and the note links back to note 2 in relation to flexibility of tenure mix to assist with compliance with part d of SP5.
Q3b: Should VA include requirement to demonstrate different tenure mixes have been tested – is 30% on-site is viable?	5 responses agreed with this approach	
Q3c: Should VA include requirements to present tenure mix assessment to show range tested and which mix provides highest % on-site – and liaise with housing dept about mix and need	All 6 responses agreed with this approach	
Q3d: Should VA include requirements that applicants should identify the policy compliant off-site financial contribution calculations	5 responses agreed with this approach	
Q3e: Should VA include the requirements that applicants should show that part d of Policy SP5 has been tested and a combination of options explored	4 responses agreed with this approach	

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
<p>Q3f Please provide any other comments in relation to the consideration of viability and affordable housing delivery?</p>	<p>Respondents emphasised:</p> <ul style="list-style-type: none"> • the need for pragmatism, clarity and avoidance of unnecessary complexity. • Avoid part-on-site / part-contribution • Viability should be tested case-by-case • considering a joint viability assessment rather than separate developer and council consultants, to reduce disputes; • or using a third-party assessor where disagreement arises. • Greater clarity in the SPD on resolving disputes would be welcome. • Avoid adding more layers to viability discussions • Viability challenges are not always “on paper” <ul style="list-style-type: none"> ◦ Sometimes RPs cannot bid at the values assumed in viability evidence due to their own business models, needs etc ◦ can also be heavily influenced by statutory consultees’ requirements (e.g. education, highways) • Disagreement with the idea that viability should always consider the whole development- the overall scheme may be viable, but the affordable housing element alone is not 	<p>Guidance Note 5 includes 3 options and guidance for who can prepare an appraisal and this includes a joint LPA/developer approach.</p> <p>Clarity is included in relation to dispute resolution, in that the LPA as decision maker will determine disputes.</p> <p>Flexibility added for sites of 10 or less to consider a,b,c of SP5</p> <p>Feedback in relation to other statutory obligations has been considered and the guidance note includes a reference to reducing other contributions where a viability case is marginal.</p> <p>The council does not agree that Viability Appraisals should only consider the AH element of the site. AH is an obligation on the whole site, tested at 30% in the LP Viability work and viability can only be considered in that context.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
4. Practicality Reasons		
Q4a: Should the SPD identify practicality exceptions to providing affordable housing on site?	5 responses agreed with this approach	Guidance Note 4 in the SPD addresses practicality exceptions.
Q4b: If you answered 'Yes' to question 4a, please specify what practicality exceptions these should be.	<p>Key Points:</p> <ul style="list-style-type: none"> • Where a developer can demonstrate that no RP is willing to take the units, the SPD should allow a default to Discount Market Sale (DMS). • Need for clearly defined “practicality exceptions”. These should include <ul style="list-style-type: none"> ◦ Small unit numbers / small sites on-site provision causes disproportionate management or delivery issues. ◦ Constrained or complex sites where layout make on-site delivery impractical. ◦ Heritage or technical constraints ◦ Lack of RP interest or appetite, ◦ Phased or complex regeneration areas • Alignment with emerging NPPF approach: For medium schemes (e.g. up to 50 units) there must be a mechanism for off-site contributions 	<p>Guidance Note 4 addresses reasons for practicality constraints, including those highlighted. However, the councils housing team have confirmed they are offering on most sites, even smaller schemes, and other guidance notes in the SPD offer flexibility and guidance in terms of tenure and design, therefore many practicality reasons in relation to RPs not taking sites can be resolved.</p> <p>The guidance note therefore requires early engagement on the issues and in circumstances where it is not resolved, will consider off-site contributions or other solutions such as the suggested DMS.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
		<p>The draft SPD does not factor in the ‘medium’ category referenced in the 2025 NPPF consultation as this was not in the draft NPPF text and the council raised concerns with this proposed approach in response to the consultation, particularly in terms of how this affects sites smaller than 10 units captured by SP5 in Designated rural areas.</p>
<p>Q4c: Please provide any views you have on the minimum number of 10 Registered Providers (including the council’s housing team) being suggested.</p>	<p>Respondents supported requiring engagement with RPs but felt minimum of 10 RPs (including the Council’s housing team) is excessive and impractical</p> <p>Several argued that the Council’s housing team should not be included due to limited resources. Respondents questioned whether 10 active RPs operate in Dover and should be flexibility, with the Housing Manager able to agree a lower number</p> <p>Some developers indicated they are not opposed to contacting 10 RPs, but only if the Council provides a clear list of required RPs and contact details.</p>	<p>Guidance Note 4 was amended to reflect this feedback and reduced to requiring evidence from 5 RPs (including the council) from 10 to reflect that the councils housing team are offering in most circumstances and the amount of RPs operating in the district.</p> <p>It was determined not necessary to list those RPs due to the reduced number.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
<p>Q4d: Please provide any comments you have on whether off-site commuted sums or on-site low-cost home ownership products should be required where practicality issues are accepted.</p>	<ul style="list-style-type: none"> • Several respondents stressing that Discount Market Sale (DMS) should be considered before defaulting to off-site contributions • Where practicality constraints prevent on-site delivery, the SPD should clearly endorse off-site commuted sums—especially for SMEs and smaller or constrained sites. • A transparent approach to off-site contributions is needed. • Both options—on-site low-cost home ownership products and off-site contributions should remain acceptable. 	<p>This feedback was considered and factored into draft Guidance Note 4 which states that if evidenced, the council may agree either an off-site contribution or other tenure such as DMS as a more practical approach.</p>
5. Meeting the 30% of SP5		
<p>Q5a: Please state your preferred option (1-3). 1 – Unit numbers always rounded up 2 Accept financial contributions for part payments where it is less than 0.5 of a unit 3 Accept financial contributions for all part units (up to 0.9)</p> <p>Q5b: Please state option preferred in question 5a and explain choice.</p>	<p>Respondents were split across the three options, with Options 1 and 3 each receiving two preferences and Option 2 receiving one.</p> <ul style="list-style-type: none"> • Rounding up could force unrealistic or “contrived” schemes, • Part financial contributions seen as overcomplicated • Several respondents favoured rounding below 0.5 down and 0.5 or above up 	<p>Note 1 in the draft SPD sets out a requirement for rounding up when 0.5 of a unit or more and no requirement for those under 0.5 of a unit. This is considered a fair and reasonable balance and responds to concerns raised by stakeholders about overcomplication of requiring off-site payments for part units and disproportionate effects on SMEs rounding up in all cases.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
Q5c: Please provide any other suggestions for how the delivery of part unit requirements could be addressed.	<ul style="list-style-type: none"> ○ Rounding down where the affordable housing requirement is 0.4 units or less aligns with practices in other Kent LPAs and provides certainty for applicants. 	
6. When should Affordable Housing Details be agreed?		
<p>Q6a: Should the SPD require that in most cases the detail of Affordable Housing unit location, mix, and tenure to be agreed with council at pre-application stage or at latest application stage – prior to decision.</p> <p>6b – Explain why not</p>	<p>All five respondents answered ‘no’ to requiring affordable housing details to be agreed at pre-application or outline stage:</p> <ul style="list-style-type: none"> • Information is not available that early At pre-app or outline stage, developers and land promoters typically do not yet know which Registered Provider (RP)—if any—will be willing to take units. <ul style="list-style-type: none"> ○ Landowners often secure outline permission <i>before</i> selling the site to a developer/RP. ○ RP bids are usually only possible once Reserved Matters details (layout, design, unit types) are known. • Fixing too much detail early can depress land values and inhibit delivery. • Early RP offers are not reliable Any informal RP expressions of interest at the application stage often expire before planning 	<p>Guidance Note 6 in the draft SPD has taken into account the feedback received. It encourages pre-app discussions but only requires full details of the AH mix. Sizes etc on full and reserved matters applications.</p> <p>For outline applications, where the information is not available at that level of detail, they will only be required to submit a statement outlining how AH is expected to be met.</p> <p>In accordance with note 2 – it also allows for flexibility of tenure mix in legal agreement, to limit post decision amendments.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
	<p>permission is granted, Therefore, requiring firm commitments too early is unrealistic.</p> <ul style="list-style-type: none"> • Respondents felt the SPD should focus on clear guidance and flexible S106 drafting that can accommodate: <ul style="list-style-type: none"> ○ Discount Market Sale (DMS) ○ viability-led approaches ○ or RP involvement once a scheme is more advanced. • Fixing affordable housing arrangements at pre-app or application stage could: <ul style="list-style-type: none"> ○ force redesigns as the scheme evolves; ○ add cost and negotiation time; ○ delay the submission or determination of applications. • Outline schemes cannot secure RP bids as RPs require: <ul style="list-style-type: none"> ○ a detailed design, ○ an approved or near-approved layout, ○ and clarity on technical costs before making a meaningful offer. 	<p>It was decided not to include additional details in relation to S106 wording due to the government's intention to produce standard S106 clauses in the future.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
Cascade Mechanism		
<p>Q6c: Should the SPD include guidance and provision for including a ‘Cascade Mechanism’ in decisions and S106 agreements? 6d - Explain</p>	<p>All six respondents supported the inclusion of a cascade mechanism.</p> <ul style="list-style-type: none"> • A well-designed cascade can: <ul style="list-style-type: none"> ◦ reduce expensive and time-consuming legal negotiations, ◦ enable officers to make evidence-based decisions, and ◦ avoid stalling schemes due to rigid requirements. • Several respondents warned that cascades can become overly onerous if drafted badly. If the process forces developers to “prove” undeliverability over several months, it risks: <ul style="list-style-type: none"> ◦ delaying start on site, ◦ adding finance and programme risks, ◦ potentially deterring development altogether. <p>Respondents said cascades should:</p> <ul style="list-style-type: none"> ◦ be realistic and streamlined, ◦ not replicate the same burdens they are meant to avoid, ◦ and prioritise practical deliverability. <ul style="list-style-type: none"> • Model welcomed particularly when no RP is secured early – adds certainty 	<p>Comments supporting a cascade mechanism in all S106 agreements were noted.</p> <p>The draft SPD did not take forward this approach for several reasons. Firstly, the government have indicated that they do not expect LPAs to adopt cascades unless they work for local circumstances and they are considering publishing standard S106 templates. See Policy statement: a roadmap for Section 106 delivery in England - GOV.UK (Jan 2026)</p> <p>Secondly the SPD adds some of the flexibility through different routes to a full cascade. This includes in Note 2, which allows for flexibility of tenure mix and for S106 agreements to include this flexibility so mix does not need to be re-visited post decision where details change but remain in</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
<p>Q6e: Please provide any comments you have on the specific proposals for the cascade mechanism.</p>	<ul style="list-style-type: none"> • Discount Market Sale (DMS) should appear early in the cascade • The cascade should be simple and time-limited, with: <ul style="list-style-type: none"> ◦ Clear stages and defined timeframes (e.g., 4–8 weeks per stage); ◦ Clear evidence requirements (emails); ◦ No open-ended marketing periods. • RP engagement should be targeted, involving a small number of relevant RPs • Built-in tenure flexibility is important, without re-opening viability assessments. • A transparent commuted-sum “backstop” is essential • Over-complex triggers must be avoided, no repeated approvals or sign-offs • One respondent highlighted Swale Borough Council cascade -changes to tenure mix: <ul style="list-style-type: none"> ◦ require evidence demonstrating the agreed mix cannot be delivered; ◦ must be approved by the Council; ◦ cannot introduce new tenure types not already listed in the S106. • Any variation to tenures <i>outside</i> those already listed in the S106 would require a Deed of Variation, maintaining proper legal control. 	<p>accordance with the SPD, and in Note 4 which allows for off-site contributions or alternative tenures such as DMS, where practicality issues to on-site delivery have been evidenced. This resolves many of the suggestions or issues raised during consultation on this topic.</p> <p>In addition, not including a full cascade mechanism reduces the concerns about clearly defined timescales / marketing periods and complex triggers and sign off processes.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
7. Calculating off-site contributions		
<p>Q7a: Which financial contribution calculation option do you consider most appropriate/practical?</p> <p>1a – 5% of Gross Development Value (GDV) (Current SPD approach)</p> <p>1b – Increased % of Gross Development Value (GDV)</p> <p>2 -Based on grant funding/subsidy and OMV/GDV (current practice)</p> <p>3 -Based on Gross Internal Area (GIA)</p> <p>Other -?</p>	<p>Three supporting Option 1a, one supporting Option 1b, and one supporting Options 2 and 3.</p> <p>Option 1a preferred for clarity and simplicity:</p> <ul style="list-style-type: none"> ○ easy to understand and apply ○ transparent for developers and landowners ○ based on an established method ○ predictable for viability appraisals <p>The Council must provide evidence whether the 5% figure is effective, including how much has been collected and whether the issue is the percentage or simply the low number of qualifying sites.</p> <p>Concerns about Option 1b:</p> <ul style="list-style-type: none"> ○ uncertainty around how a revised percentage would be justified ○ need for careful scenario testing ○ requirement to correctly account for differences in specification, funding, and sales/marketing costs between market and affordable units 	<p>Based on consultation responses, assessments of recent local developments and viability appraisals and the Local Plan viability evidence, the council will remain using the current calculator approach using a % of GDV. Based on the evidence collated, this will be option 1b.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
	<ul style="list-style-type: none"> • 1a & 1b - GDV-based approaches have limitations <ul style="list-style-type: none"> ○ While simple, GDV does not reflect actual development costs (e.g., contamination, abnormal foundations, S106 obligations). ○ GDV is a “blunt tool” but a fixed, simple, transparent method is still preferable to overly complex alternatives. • Significant concern about Options 2 and 3 introducing complexity <ul style="list-style-type: none"> ○ Option 2 was not well understood and was seen as overly complicated, particularly if it implies buying back private units with grant funding. ○ Option 3 could in principle offer certainty, but would require robust scenario testing and clear worked examples to avoid unintended consequences. ○ Some worried Option 3 could incentivise contrived unit designs (e.g., oversized garages or voids) to manipulate floor area calculations. 	

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
8. Deferred Contributions		
<p>Q8a: Which form of re-appraisal do you consider most appropriate?</p>	<ul style="list-style-type: none"> • Monitoring sales values was suggested, but not as a standalone measure. • Full viability re-appraisal was supported by some respondents as a way to reassess affordability where circumstances change. • Updating an existing viability appraisal was considered straightforward, but respondents stressed that sales values alone do not give an accurate picture, especially when build costs are rising faster than sales values. • Re-appraisal should be limited in scope: Several respondents argued that profit margins and professional fees should not be revisited, as re-opening these areas would create uncertainty and risk for developers. • Support for a capped overage-style review mechanism, based on: <ul style="list-style-type: none"> ○ actual outcomes, ○ clear benchmarks, and ○ defined triggers. • This was seen as a proportionate way to balance developer certainty with capturing additional value where appropriate. 	<p>Guidance note 10 in the draft SPD sets out the council’s approach. The council does consider sales values alone to be an accurate measure of change to viability, rather than a complex re-assessment or new viability appraisal. It is common practice that Sales Values are used, and other cost changes are not accepted as part of the re-assessment.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
<p>Q8b: For monitoring of sales values, do you have any suggestions on the % of uplift that should form the financial contribution?</p>	<p>Some respondents stated sales values should not be used at all; if they are, any uplift trigger should be capped at no more than 50%.</p> <ul style="list-style-type: none"> • One respondent suggested a specific trigger (e.g., a 30% rise in sales values leading to a 5% contribution) • They also recommended that the SPD should clearly set expected profit assumptions, suggesting 20% for smaller sites. • If a sales-value uplift mechanism is used, it must be modest and capped • Some respondents proposed allowing the Council to capture up to 25% of the uplift above a benchmark, using a simple, transparent formula. • Developers take on market and delivery risk, so uplift-sharing must be proportionate. Over-capturing uplift could: <ul style="list-style-type: none"> ◦ discourage investment, ◦ reduce incentives to optimise scheme quality, and ◦ ultimately undermine housing and affordable delivery. 	<p>Guidance note 10 sets out the councils approach to the mechanism for deferred contributions.</p> <p>Although the comments on uplift value were considered these were considered not to be realistic. The PPG on viability</p> <p>The council has proposed a common standard approach at 10% or higher of original sales values, and a split of 60% uplift to the LPA and 40% to developer.</p> <p>The draft note exempts minor development from the process, as it would be unlikely that sales values on small sites of this size would increase to an amount that would generate any meaningful contribution.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
<p>Q8c: Please provide comments on the timing and stages of the re-appraisal.</p>	<ul style="list-style-type: none"> • Land Registry data is only available around three months after sale, making it a poor basis for timely review. • Sales incentives and discounts are not always reflected, making data unreliable. • Some suggested a review within six months of 95% completion • A re-appraisal can only be accurate once all units are sold, • If the final unit is slow to sell, interest costs may significantly harm viability. • Several respondents argued that if a developer builds and sells quickly, the agreed viability position should remain fixed to provide certainty. A waiver should apply where development is implemented or first occupied within an agreed time period. • Timing should be negotiable, not fixed - Respondents emphasised that review stages should be agreed case-by-case through S106 negotiations, as different site sizes and development forms require different review points. 	<p>The mixed responses to this question have led to the guidance note setting out a requirement that sales values will be required to be submitted within 3 months of completion of the last property that has been built/sold. This is either on the whole site, or if a large scheme being delivered in phases, at the end of each phase. This will be agreed on a case by case basis.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
<p>Q8d: Are there any exceptions to requiring re-appraisal for deferred contributions? Please specify</p>	<ul style="list-style-type: none"> • No re-appraisal where no uplift is realistically possible -If there is no plausible prospect of an increased commuted sum, a re-appraisal would only generate unnecessary cost. • Build cost inflation outpacing sales values Where evidence shows build costs have risen faster than sales values, a re-appraisal would be inappropriate • Re-appraisal should be waived where requirements would be disproportionate or hinder delivery, including: <ul style="list-style-type: none"> ○ Small schemes / SME-led ○ Schemes delivered quickly, e.g. development implemented or first occupation achieved within an agreed timeframe ○ High-abnormal-cost, brownfield, or regeneration sites with significant risk ○ Cases where a fixed deferred sum or capped overage mechanism has already been agreed ○ Schemes with a build programme under 24 months, where market conditions are unlikely to materially change within that period 	<p>To take into account comments received, the guidance note sets out that minor development sites will be exempt from the deferred contributions mechanism completely and in cases where the site is full completed within 2 years of consent, the review mechanism will not be requested to be completed, as it is unlikely in both scenarios that sales values would have increased significantly to show the scheme has become viable.</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
9. Other information in the SPD		
<p>Q9a: Please provide any comments you have on the matters a) to m) proposed to be included in the SPD.</p>	<p>Respondents were broadly supportive of most of the proposed SPD items (a–m), recognising their potential to improve clarity, consistency and decision-making, but emphasised that the SPD must remain practical, proportionate, and avoid adding unnecessary administrative burden or “policy creep.”</p> <p>Feedback on Specific Items:</p> <ul style="list-style-type: none"> • a) Flow chart – Strongly supported; must be simple and easy to follow. • b) Designated Rural Areas – Helpful for certainty; welcomed by multiple respondents. • c) Subdivision of large sites – Understood in principle but must be applied pragmatically. Requires a clear definition of “large site” and should not hinder delivery, especially where land parcels come forward separately. • d) Space standards / M4(3) rounding – Clarity welcomed but requirements must be proportionate. • e) Affordable housing schedules at application stage – Potentially burdensome and could delay submissions; flexibility should remain where tenure cannot sensibly be fixed early. 	<p>a) Flow Chart has been included DRAs have been clarified</p> <p>b) Designated Rural Areas clarified</p> <p>c) Subdivision of sites is clarified in terms of splitting them where they would generate AH as a whole site</p> <p>d) SPD confirms M4(3) units will be rounded to nearest whole number</p> <p>e) This is addressed in guidance note 6 and 2 with regards to tenure flexibility</p> <p>f) Issue of clustering Vs tenure blind pepper potting has been addressed in note 3</p> <p>g) This is addressed in notes 7 & 8</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
	<ul style="list-style-type: none"> • f) Tenure-blind design – Supported in principle, with room for pragmatic exceptions linked to management and deliverability. respondents noted that most RPs prefer clusters of affordable units, not dispersed pepper-potting, for effective long-term management. • g) Special cases (self-build, older persons, VBC etc.) – Helpful, provided they don't add complexity or conflict with SP5. • h) Standard S106 clauses – Strong support; would streamline drafting. • i) In-perpetuity / DPA waivers – Clarity welcomed. • j) How commuted sums are spent – Strongly supported for transparency and confidence in the system. • k) Rural Local Housing Needs (H2) – Helpful but needs realism; some parishes lack resources to undertake assessments. • l) Submission requirements - Supported only if proportionate and not overly prescriptive. • m) Interpreting Local Plan viability evidence - Helpful, but should not introduce exhaustive comparisons for every scheme. 	<p>h) S106 not taken forward at the government is proposing to set out standard clauses</p> <p>i) Guidance note 11 explains and addresses DPA waivers and in perpetuity requirements for Shared Ownership in designated areas.</p> <p>j) SPD links to IFs and housing strategy</p> <p>k) Guidance in note 12 links to how assessments of local housing needs can be undertaken by parishes and implementation of Policy H2</p> <p>l) This is included in Guidance note 6</p> <p>m) this is included in viability appraisals section</p>

Question	Summary of Responses	How have the council addressed responses in the draft SPD?
<p>Q9b: Are there any other topic areas the SPD needs to cover? Q9c: If you answered 'Yes' to question 9b then please provide details.</p>	<ul style="list-style-type: none"> • Engage Registered Providers (RPs) more directly Respondents stressed that RPs are the primary deliverers of affordable housing and significantly influence tenure choices. • Proportionality and SME impacts <ul style="list-style-type: none"> ○ impacts on SME developers, ○ unintended threshold effects. For example, a 9-unit scheme has no onsite requirement, whereas 10 units can trigger contributions that undermine viability. • Broader context: acute affordable housing need The housing crisis—particularly acute in the South East—means supply is far below need, and there is no simple solution. • Respondents highlighted a growing problem: many RPs are unwilling or unable to take on small numbers of affordable homes, especially in remote or rural locations. • Flexibility is vital. Flexibility on tenure, delivery mechanisms, and integration of Discount Market Sale products was seen as essential 	<p>Registered Providers have been consulted and will be consulted again on the draft SPD.</p> <p>There have been several additions to the SPD notes that remove specific requirements for minor development sites. Guidance notes on tenure mix and practicality issues are included. Thresholds of policy cannot be amended through SPD.</p> <p>National housing delivery issues are highlighted in SPD with several notes to address issues.</p> <p>A number of guidance notes add flexibility and solutions to delivery, including tenure mix changes, and discount market sales being acceptable.</p>

3 Public Engagement

- 3.1 Public engagement on the draft SPD took place between 14th April and midnight on 14th May 2026. All documents were made available on the council's website, and online consultation portal where representations were able to be made.
- 3.2 Hard Copies were also available in at the Council offices in Whitfield and libraries in Dover, Deal and Sandwich, along with all relevant supporting information and hard copy representation forms (see [Appendix 8](#)). The Council also produced an FAQs document ([Appendix 10](#)) which provided a summary of the SPD and its content, information about the status and purpose of SPDs and how to make comments.
- 3.3 A Statement of Representations Procedure (See [Appendix 6](#)) which set out the above information in more detail, including the content of the SPD, where it could be viewed, and how to make comments on the SPD and supporting documents was published on the Council's website and sent to libraries.
- 3.4 Email Notifications of the consultation commencing were sent to the following:
- All statutory consultees
 - All Town and Parish Councils in the district
 - Ward Members
 - Stakeholders registered to the Council's planning consultation portal
 - Developers/Agents on the Council's forum
 - Registered Providers on the housing department database
- 3.5 A 'keep me posted' email was sent to all residents signed up to the Council notification service (over 1000 registered). A LinkedIn post was created on DDC page and the planning department public newsletter published in April, highlighted the consultation was due to commence.
- 3.6 Follow-up emails were sent through the consultation portal and directly to Registered Providers and the stakeholders that responded to the earlier consultation (For the details of these see [Appendix 7](#)).

- 3.7 Twenty representations were received. These are summarised in the table below, with responses from the Council, and details of how the issues have been taken into account in the final SPD.
- 3.8 The full representations can be viewed on the Planning Portal. www.dover-consult.objective.co.uk/kse/folder/19736. Use tab 'What people said' (please email planning.policy@dover.gov.uk if you wish to view in hard copy).

Table 2 - Summary of representations, the Council’s response, and how issues were addressed in the final SPD

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
1	Environment Agency	No Comment	
2	Natural England	No Comment	
3	Coal Authority	No Comment	
4	Historic England	No Comment	
5	V Tierney	Supports all 12 Guidance Notes. Provided a comment that due to technical nature and length of document it was hard to make an informed comment and ‘more simplicity’ was required.	Comments noted. The guidance is quite technical in nature. FAQs were provided alongside the consultation to summarise the SPD and Guidance Notes and this will be updated and retained alongside the adopted SPD on the website as a non-technical summary.
6	Kent Police	General comments made in relation to Crime Prevention Through Environmental Design and Secured by Design Principles	Comments noted. These principles are already addressed in Local Plan Policy PM1 and would be relevant to all schemes and their design, not just affordable schemes. No amendment proposed to SPD.
7	Kent County Council	No Comment	

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
8	Hobbs Parker	Welcome the changes made to SPD following earlier stakeholder engagement – in particular the financial contribution in lieu of on-site.	Support noted.
9	Walmer Town Council	No Comment	
10	St. Margarets Parish Council	Support for all 12 Guidance Notes. Made a comment on Guidance Note 5 in relation to option 3 being preferred for undertaking viability appraisals as they are non-biased.	Support noted. Preference noted for viability appraisal to be undertaken independently, but options must be available to applicants as set out in national policy, and therefore no amendments are proposed.
11	National Highways	General support for principles. Added comments about AH not being the only consideration in planning applications and impact of development on SRN to be added to paragraph 1.5. Also mentions site viability and methods for securing mitigation to SRN and that AH and other infrastructure delivery must be balanced as part of planning application.	Comments noted. The SPD is adding to existing Local Plan policy SP5, and other Local Plan policies addressing planning obligations, such as for highway requirements and infrastructure contributions (Policies SP11 and SP12). These are not affected by the content of the SPD. No amendments proposed.
12	Aylesham PC	Comments on each Guidance Note (GN) summarised below: GN1 – Support but should not reduce provision	Support comments noted. Objection to GN2 and GN4 is noted, however, due to the current issues in delivery of Affordable Housing locally (and nationwide), the council considers that additional flexibility will

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>GN2 – Objects – too much flexibility and risks reducing social rent</p> <p>GN3 – Omission – needs stronger integration requirements</p> <p>GN4 – Object – practicality weakens delivery</p> <p>GN5 – Object – viability may reduce provision</p> <p>GN6 – Support – must be secured early</p> <p>GN7 – Support – adds clarification</p> <p>GN8 – Support – must not avoid obligations</p> <p>GN9 – Object – oppose off site provision</p> <p>GN10 – Object – topic is uncertain</p> <p>GN11 – Support – affordability in perpetuity supported</p> <p>GN12 – Omission – more support needed for parishes for LNH</p> <p>PC recommends stronger emphasis on on-site delivery, local housing need and monitoring and notes the conclusions of supporting documents but highlights significant social impacts.</p>	<p>lead to faster delivery or the right types of affordable housing on-site needed across the district, reducing negotiation post consent, and off-site contributions.</p> <p>GN3 – Policy PM1 of the Local Plan already sets out that developments should be tenure blind, and this Guidance Note cross references that requirement. No amendment proposed.</p> <p>GN5 - Comments noted. No Amendments. The option to submit a viability appraisal is established by national guidance and SP5.</p> <p>GN9 - Opposition to providing off-site contributions in principle is noted, but this approach is already established in Policy SP5 and national policy.</p> <p>GN10 – A deferred contributions mechanism is allowed for in Policy SP5, and this note clarifies its implementation in practice.</p> <p>GN12 - The Guidance Note is intended to highlight the process of undertaking local needs assessments, in liaison with the housing team</p> <p>Disagree - Policy SP5 and the Guidance Notes in the SPD make clear that on-site delivery is the starting point for consideration of Affordable Housing provision and requirements for</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
			<p>applicants to consider local needs is set out in several of the guidance notes.</p> <p>In addition, upon adoption of the SPD, the webpage which links to the SPD will also include links to all relevant local needs surveys and information.</p> <p>Monitoring is undertaken within the annual Authority Monitoring Report (AMR). The Equalities Impact assessment notes that there are impacts in relation to the SPD. It is not considered that any amendments are required to the SPD to address these issues.</p>
13	Rebus Planning Solutions	<p>Adoption of the SPD in advance of the forthcoming NPPF update is premature.</p> <p>There is significant evidence of site delays and adoption of SPD before new NPPF will add further burden upon housebuilders.</p> <p>Requests the council delays adoption of SPD until national policy direction on AH and viability is known.</p>	<p>Comments noted. The emerging NPPF proposals and any national policy changes that come into effect which are not consistent with Policy SP5 or the SPD would be taken into account as a material consideration.</p> <p>Policy SP5 is adopted and the SPD is supporting this policy. It adds additional flexibility and clarity to the policy and not further burdens for housebuilders. SPDs cannot be adopted after June 2026.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
14	The Dover Society	Object in principle to the blanket exemption of Dover Urban Area from the requirements of AH under Policy SP5. They wish this exemption to be removed and sites assessed on a case-by-case basis.	The exemption of Dover Urban Area was established through the Local Plan process and evidenced by viability work. The SPD is produced to support the implementation of SP5 and cannot amend the specific district geographical requirements.
15	Ashfords LLP on behalf of Pentland Homes Ltd, Danescroft (Whitfield) LLP and Halsbury Strategic Ltd	<p>Object to a number of the Guidance Notes and raise concerns over legality of the SPD. They state it goes beyond what an SPD should include (overreach) under regulations.</p> <p>Key points:</p> <p>Guidance Note 9 – (calculating financial contributions)</p> <p>Dispute the 10%GDV figure for off-site financial contributions. They state there is no evidence or worked example for 10% of GDV, and that this approach should only be set in policy (DPD) and therefore this is overreach to include in the SPD. They recommend amendments to this guidance note in that it should set out, with examples, how the council will consider calculating commuted sum calculations in line with SP5 and national policy.</p>	<p>GN9 - Policy SP53c of the Local Plan states that the council will consider <i>'provision of an off-site financial contribution in lieu of affordable housing provision on-site, to secure equivalent provision of affordable housing offsite'</i></p> <p>Paragraph 3.93 of the implementation text to SP5 states that <i>'The calculation for provision of off-site contributions is currently set out in the Addendum to the Affordable Housing SPD and is equivalent to 5% of the GDV of the scheme as a whole. This will be reviewed as part of an updated SPD'</i>.</p> <p><u>Proposed Amendment to GN9:</u> To address these comments changes have been made to the supporting text and guidance note to include additional justification and evidence for the 10% GDV, as well as allowing an alternative site-specific assessment to be used to calculate the off-site contribution.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>Guidance Note 10 (deferred contributions) - Raises concerns about the re-appraisal being limited to sales value only. They advise amendments in the form of recasting the review mechanism as a negotiable principle rather than a mandatory single metric rule. Their suggestions include amending the review so that scope, triggers and methodology would be agreed case by case and that it should include both revenue and cost movements to avoid double counting. They also state that schemes built with 24 months are exempt due to proportionality and administrative cost.</p> <p>Guidance Note 8 (Specialist and Older Persons Housing) They state that the note requiring all C2 residential institutions to comply with SP5 is going beyond what is stated in Policy SP5 (which says dwellings) and that exempting schemes from providing viability evidence pre-judges the planning balance and is inconsistent with the policy requirement for viability appraisals.</p>	<p>GN10 - Comments acknowledged and <u>amendments made to GN10 as follows:</u> Changes have been made to supporting text and guidance note to remove the sales value only approach, and 60% of uplift requirement, and instead consider changes in revenue and costs.</p> <p>In addition, clarification is provided that any deferred contribution will be capped at the level of an appropriate off-site contribution, as set out in Guidance Note 9, except in circumstances where other development contributions were deferred.</p> <p>GN8 - Agree that reference to C2 use class should be removed, and the following amendments have been made to clarify the requirements of Policy SP5 in relation to this housing type.</p> <p><u>Amendments to paragraphs 9.5 and new 9.6</u> to add specific reference of Local Plan paragraph 3.88 which establishes that independent housing units is the criteria to be determined, and sets out more information about why, due</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>They also state that the reference to the Rectory Homes case is not completely aligned. They suggest that it should only apply to schemes which are defined as 'dwellings' as referenced in SP5 and remove blanket statement that all C2 schemes are required to provide affordable housing.</p> <p>They also suggest that they should not be exempt from the viability appraisal requirements to provide off-site contributions in lieu of off-site.</p> <p>Guidance Note 4 (Practicality Issues) Comments include that the statements that the councils housing team will in most cases be interested on taking the AH units and requiring evidence from RPs seeks to presume the council itself must be the counterparty on terms it deems suitable rather than assessing reasonable commercial terms. They suggest removing the reference</p>	<p>to site size and design of stand alone specialist housing schemes, it may not be practical to deliver on-site AH and therefore the applicant does not need to submit a viability appraisal to provide an off-site financial contribution.</p> <p>In addition, there are <u>several amendments to Guidance Note a) and b)</u>: Merged a) and b), Deleted reference to class C2 (Residential Institutions) from b) and moved the reference to specific case law from b) to a footnote. Updated the viability appraisal exemption from 'will' to 'may'.</p> <p>GN4 – Council have noted the comment and made the following minor <u>amendments to paragraph 6.2</u>:</p> <p>Removed the words 'in <i>most cases</i>' and just state that the Council will be interested in taking on the AH units and deletion of '<i>so this matter is unlikely to arise very often</i>'.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>that the councils housing team will 'in most cases' take the homes.</p> <p>They suggest the requirement for evidence from RPs should be amended from a minimum of 5, to a 'sensible number of RPs active in the district of a reasonable period'.</p> <p>They suggest adding a clear definition of 'reasonably commercial terms' to avoid disputes on whether offers are viable in practice.</p>	<p>Offers for Section 106 (S106) properties from the Council are carefully assessed and submitted on a best-offer basis, reflecting a balanced approach between market realities and long-term viability, based on what the property is worth and the income it can reasonably generate. This approach ensures that offers remain both competitive and realistic.</p> <p>Officers disagree with this position, as the 5 is considered a sensible number and this is clarified through an <u>amendment to para 6.5</u> Added text: <i>The requirement for 5 is considered a sensible and reasonable amount, based on knowledge of RPs operating in the district</i></p> <p>The council does not agree that a definition of 'reasonably commercial terms' can be included in the SPD. Defining this detail would be beyond the scope of what an SPD should include as it would effectively defining what the Council consider to be viable, and it is not a fixed definition which could change over time, dependent upon other external factors.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>Emerging NPPF references – Concerns highlighted that referencing emerging policy cuts across the statutory presumption that decisions are made in accordance with development plan unless material considerations indicate otherwise. They advise to remove reference to emerging national policy being taken account of alongside existing policy and state that it supplements existing policy and the development plan unless material considerations indicate otherwise.</p> <p>Application Stage information requirements – (Guidance Note 6) there is a suggestion that the SPD makes clear that outline permissions can secure AH through conditions and obligations with approval of details at an appropriate, clearly identified trigger.</p>	<p>2025 NPPF consultation references were included in the consultation document for clarity that the emerging proposals were considered in the drafting of the SPD. Given that these changes have not yet been made to national policy and given that they will be a material consideration alongside local policy and guidance, an <u>amendment has been made to delete references within the SPD to the 2025 consultation document (paragraphs 2.20-2.22, footnote 16, and paragraph 14.7).</u></p> <p>Agreed that flexibility may also need to be applied to Full and RM applications. <u>Clarification is added to para 8.5.</u></p> <p><u>Amendments also made to Paras 8.4 and c) of guidance note 6</u> in relation to requirements for outline applications. Changing requirement from requiring applicants to show how AH details <i>‘will’</i> be met to <i>‘are intended to met’</i> and added changed <i>‘proposed tenure split’</i> to <i>‘potential tenure split’</i></p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
			<p>In addition, an added footnote: <i>*Where it is not possible to provide this information with the application, the applicant will be required to explain why the information is not available and confirm that potential viability of the Affordable Housing and the likely tenure mix has been considered.</i></p>
16	SME Developer Network Kent	<p>Welcome the councils' efforts to consolidate and update AH guidance through the SPD to support the implementation of SP5 and welcomes a number of the pragmatic and flexible elements but have specific comments with regards to refinement of the SPD. Key points made:</p> <p>Viability – they acknowledge this is addressed in the SPD but seek stronger cross referencing in Part 3 to reaffirm that SP5 is not applied in isolation.</p> <p>GN1 – Supported GN2 – Support Part C which confirms DDC will consider less than 55% affordable/social rent on a case by case basis and waiving need for viability assessment. Support clarification in the consultation statement that Discount Market Sales are allowed under 'other home</p>	<p>Support comments welcomed.</p> <p>Viability – Disagree, part 3 of the SPD sets out Policy SP5 and how it applies across the district in relation to geography and site size, it would not be appropriate to add details in relation to viability here. However, the SPD (taking into account the amendments made to several Guidance Notes) adequately highlights that the council is recognising that site specific viability issues are to be considered. Of particular note are Guidance Note 2 in relation to tenure mix changes and 9 in relation to allowing for site specific evidence to be considered to calculate off-site financial contributions.</p> <p>GN1 - Support noted. GN2 – Support noted. In response to the request for additional guidance in relation to confirming the type of evidence required, the council do</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>ownership products but suggest guidance should be provided confirming the type of evidence that should be required.</p> <p>Part e) Support proposal that flexibility regarding tenure mix can be included within S106 agreements.</p> <p>GN3 – Design and layout They do not agree that that schemes are being designed in a way that makes them unattractive to RPs. However, they do consider the council justified in requiring schemes of less than 10 units to have regards to latest evidence of needs, but consider other market factors should also be taken into account, so this this requirement should be guidance and not absolute.</p> <p>GN4 – Practicality Support the acknowledgement of practicality issues. Raise objection to statement that DDC housing will be in most case interest in taking the units. Based on their experience, the DDC offers have not be able to offer values</p>	<p>not agree this is required as GN2 option 2 allows for 20% other home ownership products or a case-by-case assessment in part c) which takes account of local needs.</p> <p>GN3 - The council did not intend to suggest developers were designing schemes to be unattractive to RPs.</p> <p>The council agrees that other market factors are also important and propose the following <u>Amendment to Para 5.2</u> - Whole paragraph replaced with alternative text which focuses on Policy H1 mix requirements and how it is important that sites under 10 units also taken the SHMA and other factors into consideration to form the housing mix proposed.</p> <p>GN4 - Council have noted the comment and made the following minor <u>amendments to paragraph 6.2:</u> Removed the words '<i>in most cases</i>' and just state that the Council will be interested in taking on the AH units and deletion of '<i>so this matter is unlikely to arise very often</i>'.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>comparable to those achieved with other RPs.</p> <p>Para 6.3 states that where no offers are received at all, the council will consider off-site contribution. This does not allow for circumstance where offers have been received but these are not viable. The state that existence of an offer should not preclude an alternative delivery mechanism.</p>	<p>Offers for Section 106 (S106) properties from the Council are carefully assessed and submitted on a best-offer basis, reflecting a balanced approach between market realities and long-term viability, based on what the property is worth and the income it can reasonably generate. This approach ensures that offers remain both competitive and realistic.</p> <p>The SPD does already acknowledge that where applicants consider an offer not viable, then a viability case must be made in accordance with Guidance Note 5 but it is agreed this can be made clearer through the following addition to text and the guidance note.</p> <p><u>New Paragraph 6.3 and footnote to Guidance Note</u> set out that where the applicant considers offer/s made to them are too low and not viable, then a viability case must be made and Guidance Note 4 is no longer applicable.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>GN5 – Viability Appraisals Suggest it is made clearer that viability appraisals are not required for tenure mix changes only – footnote 5 not clear enough.</p> <p>They support the inclusion of the option for joint viability assessment, but they must be genuinely collaborative and parties should not enter discussions with the consultants separately. A Memorandum of Understanding (MOU) could be considered for when this option is used.</p> <p>They do not support the ‘split’ approach for partial on-site delivery and partial off-site contribution as it introduces unnecessary complexity and delay, particularly where the sums are likely to be relatively modest.</p> <p>They support Part d that SP5 a-d does not apply to sites of less than 10 units.</p>	<p>GN5 - Agree – <u>Amendment made to footnote 14</u> to clarify that not required for tenure mix changes only. In addition, <i>amendments have been made to Guidance Note Criteria 2 and 3</i>, to add specific cross reference to Guidance Note 2 in relation to testing of different tenure mixes as part of the viability appraisal, for clarity.</p> <p>Noted - <u>Amendment to Appendix 1</u> – Added text in relation to joint viability appraisal: <i>‘All communications between parties and the consultant will be copied to the other party’.</i></p> <p>It is acknowledged that this split approach is not likely to be an option available in many cases, so <u>amendments have been made to Guidance note criteria b5</u> to reduce scope of requirements.</p> <p>Criteria a) and b) of Guidance Note 9 have also been amended to clarify which approach would be applicable in circumstances where no AH is provided on-site or where some has been provided on-site (split approach)</p> <p>Support noted.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>GN6 – when and how to agree AH details</p> <p>States that even in the case of RM applications, AH details may not be able to be clear as offers from RPs are not finalised until the planning consent has been granted. They state RPs generally will not offer until at least 6 months before commencement of development, and that viability considerations can shift materially between determination and delivery.</p> <p>They consider that the flexibility applied to Outline applications in para 8.5 should be applied to full applications in the same way as there are often legitimate reasons why details will change.</p> <p>They recommend that GN6 explicitly supports the use of cascade mechanisms in S106 agreements to allow for controlled adjustments to tenure mix changes without the need for a subsequent DOV.</p>	<p>GN6 - Agreed that flexibility may also need to be applied to Full and RM applications. Clarification is added to <u>para 8.5</u>.</p> <p><u>Amendments also made to Paras 8.4 and c) of guidance note in relation to requirements for outline applications.</u></p> <p>Changing requirement from requiring applicants to show how AH details ‘will’ be met to ‘are intended to met’ and added changed ‘proposed tenure split’ to ‘potential tenure split’</p> <p><u>In addition, an added footnote:</u> <i>*Where it is not possible to provide this information with the application, the applicant will be required to explain why the information is not available and confirm that potential viability of the Affordable Housing and the likely tenure mix has been considered.</i></p> <p>Part f) of the note already states that tenure mix changes, in accordance with Guidance Note 2, will be included within the S106 legal agreement without the need for a Deed of Variation. This does take the form of a limited cascade mechanism in relation to tenure mix.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>GN9 – Financial contributions. The council has not provided detail of the recent schemes used to determine the new approach to 10% GDV approach and without published examples or evidence that the approach lacks transparency and is not robust or justified.</p> <p>Recommends that the 10% of GDV should act as a starting point, rather than a fixed requirement and that case-by-case flexibility should be allowed based on proportionate viability evidence.</p> <p>Also requests that the SPD sets out more clearly how the partial on-site combined with a financial contribution will be applied in practice to ensure no double counting.</p>	<p>GN9 - Policy SP53c of the Local Plan states that the council will consider ‘provision of an off-site financial contribution in lieu of affordable housing provision on-site, <i>to secure equivalent provision of affordable housing offsite</i>’ Paragraph 3.93 of the implementation text to SP5 states that ‘<i>The calculation for provision of off-site contributions is currently set out in the Addendum to the Affordable Housing SPD and is equivalent to 5% of the GDV of the scheme as a whole. This will be reviewed as part of an updated SPD.</i>’</p> <p><u>Amendments:</u> To address these comments changes have been made to the supporting text and guidance note to include additional justification and evidence for the 10%GDV, as well as allowing an alternative site-specific assessment to be used to calculate the off-site contribution (new part b). In addition, part b also clarifies that this site-specific calculation would be applicable where some AH has been provided on-site.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>GN10 – Deferred contributions Support the principal of this approach but disagrees with the SPD approach in monitoring sales values in isolation as this provides only a partial and potentially misleading picture of development viability.</p> <p>They suggest a more robust approach would be to require a full viability reassessment which is consistent with national guidance.</p> <p>They also object to part c) and the use of a fixed 10% and 60% which are arbitrary and not justified by evidence. This approach also requires detailed post – permission monitoring and re-assessment, increasing administrative burden and delay to delivery. They support the approach exemption to small sites and those that build out within 2 years of the grant of consent.</p> <p>Designated Rural Areas Raise issue that SP5 requirements applying to sites of 6 or more in DRA is disproportionately affecting SMEs.</p>	<p>GN10 - Comments acknowledged and <u>Changes have been made to supporting text and guidance note to remove the sales value only approach, and 60% of uplift requirement, and instead consider changes in revenue and costs.</u></p> <p>In addition, <u>clarification is provided that any deferred contribution will be capped at the level of an appropriate off-site contribution, as set out in Guidance Note 9, except in circumstances where other development contributions were deferred.</u></p> <p>DRA - The 6 units or more in DRA was established through the Local Plan process and evidenced by viability work. The SPD is produced to support the implementation of SP5 and cannot amend the specific district geographical requirements. No changes proposed in relation to this issue.</p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
17	KCC Minerals and Waste Team	No Comment	
18	Churchill Living and McCarthy and Stone	<p>Churchill Living and McCarthy & Stone are independent and competing housebuilders specialising in sheltered housing for older people.</p> <p>Guidance Note 8 - Viability of applying SP5 to schemes for specialist housing is raised. The local plan viability evidence is quoted as saying that specialist older persons housing schemes are not viable enough to deliver full policy levels of affordable housing.</p>	<p>GN8 - Agree that reference to C2 use class should be removed, and the following amendments have been made to clarify the requirements of Policy SP5 in relation to this housing type.</p> <p><u>Amendments to paragraphs 9.5 and new 9.6 to add specific reference of Local Plan paragraph 3.88</u> which establishes that independent housing units is the criteria to be determined, and sets out more information about why, due to site size and design of stand alone specialist housing schemes, it may not be practical to deliver on-site AH and therefore the applicant does not need to submit a viability appraisal to provide an off-site financial contribution.</p> <p><u>In addition, there are several amendments to Guidance Note 8 a) and b): Merged a) and b), Deleted reference to class C2 (Residential Institutions) from b) and moved the reference to specific case law from b) to a footnote. Updated the viability appraisal exemption from 'will' to 'may'.</u></p>

Rep No.	Respondent	Summary of Representations	DDC Response to representations and how issues were addressed in the final SPD
		<p>Guidance Note 9 - With regards to the financial contribution calculation for 10%GDV – the representation states that this requirement in and SPD is contrary to PPG which sets out that policies for planning obligations should be set out in plans, and the formula is not set out in the Local Plan.</p> <p>State the approach is not consistent with the Local Plan viability appraisal and have quoted several examples of review mechanisms and where they are not included for single phase sites and only larger multi-phased sites.</p>	<p><u>To address these comments changes have been made to the supporting text and guidance note 9 to include additional justification and evidence for the 10%GDV, as well as allowing an alternative site-specific assessment to be used to calculate the off-site contribution.</u></p>
19	Hume Planning	<p>Following the previous engagement with stakeholders and revision made in this consultation, Hume Planning Consultancy supports this draft SPD.</p> <p>They have noted their support for all 12 Guidance Notes</p>	Support Noted
20	Marine Management Organisation	<p>No specific comments on the SPD guidance notes. Requests that the council takes note of any relevant policies within the South East Marine Plan documents in regard to areas within the AH SPD that may impact upon the marine environment.</p>	Noted – there are no implications in the SPD in relation to South East Marine Plan policies. No amendments proposed.

4 Conclusion

4.1 In response to stakeholder and public engagement undertaken during the preparation of the SPD, the Council reviewed and refined both the scope and content of the document, including amendments to the associated Guidance Notes. These changes were made to ensure the SPD effectively addresses the issues raised, while also enhancing its clarity, usability, and overall accessibility as a guidance document.

Appendices

Appendix 1 – Stakeholder Engagement Document

(Link provided to website - If you wish to view in hard copy please email planning.policy@dover.gov.uk)

Appendix 2 – Stakeholder Engagement Questionnaire

Dover District Council

Stakeholder Engagement Draft Affordable Housing Supplementary Planning Document (SPD) REPRESENTATION FORM

Please read the engagement document and FAQs before completing the questionnaire (attached to email). Responses should be made using the online form by midnight on Monday 12th January 2026.

The preferred method for receiving comments is on-line by using the Microsoft Form [Stakeholder Engagement Draft Affordable Housing Supplementary Planning Document \(SPD\)](#). If you are unable to use the on-line method of submitting comments, you may still submit comments by using this form. **Please note that all the representations received will be made public** (please refer to the guidance notes below).

Please complete all sections of the form. If you do not provide name and contact information, we will not be able to accept the representation. Please email to planning.policy@dover.gov.uk or post to Planning Policy, Council Offices, Whitfield, White Cliffs Business Park, Dover CT16 3PJ

Forms must be received by midnight on Monday, 12 January 2026.

Personal Details

Full Name and title:

Organisation (*where relevant*):

Address:

..... Postcode:

Email address: Daytime Tel. No:

Agents Details

Please give the agent's details if one is appointed on your behalf (note they will become the main contact)

Name and Organisation:

Address:

..... Postcode:

Email address: Daytime Tel. No:

1. TENURE MIX

1a. Should the SPD set out flexibility in the requirement for First Homes tenure following the NPPF amendment?

Yes

No

1b. Should the SPD set out different tenure mix options that would be supported without the need for a viability appraisal?

- Yes
- No

1c. Do you agree that the following tenure mix options should be supported without the need for a viability appraisal?

55% Affordable/social rent and 45% Shared Ownership

55% Affordable/social rent, 25% Shared Ownership and 20% other home ownership product

- Yes
- No

1d. Are there other tenure mix options that should be supported without the need for a viability appraisal?

- Yes, please specify in Q1e
- No

1e: If you answered 'Yes' to above question, please specify and set out the justification for any suggestions.

Q1f: Please provide any other comments relating to the tenure mix requirements of Policy SP5.

2. MIX OF UNIT TYPES AND SIZES

Q2a: Should the SPD set out guidance on the relationship between Policies H1 and SP5, and how the housing mix should be informed by local affordable housing need in the early stages of a schemes design?

- Yes
- No

Q2b: Please provide your comments about this

3. VIABILITY ISSUES

Q3a: Should the SPD include the suggested requirements for viability appraisals to demonstrate the requirements of Policy SP5 have been met in point 1? Applicants will be required to provide a compare and contrast assessment against the Local Plan Viability Report to show where the information has changed. This must be for all and not just individual assumptions.

- Yes
- No

Q3b: Should the SPD include the suggested requirements for viability appraisals to demonstrate the requirements of Policy SP5 have been met in point 2? Applicants should demonstrate different tenure mixes have been tested to explore if a tenure change would make 30% on-site viable.

- Yes
- No

Q3c: Should the SPD include the suggested requirements for viability appraisals to demonstrate the requirements of Policy SP5 have been met in point 3? Applicants should present their tenure mix assessments in the appraisal to show a range has been tested and to highlight what tenure mix would provide the highest percentage of on-site affordable homes (to show if any options are close to 30%). Liaison would be needed with Council housing department to ensure that the tenure mix being tested will meet a local need, even it not fully policy compliant

- Yes
- No

Q3d: Should the SPD include the suggested requirements for viability appraisals to demonstrate the requirements of Policy SP5 have been met in point 4? Applicants should identify the policy compliant off-site financial contribution calculations based on the approach set out in the SPD.

- Yes
- No

Q3e: Should the SPD include the suggested requirements for viability appraisals to demonstrate the requirements of Policy SP5 have been met in point 5? Applicants should show that part d of Policy SP5 has been tested and a combination of options a,b,c has been explored – i.e. part payments and part on-site delivery (for example, home ownership products on site, and rental as off-site contribution)

- Yes
- No

Q3f: Please provide any other comments in relation to the consideration of viability and affordable housing delivery?

4. PRACTICALITY REASONS

Q4a: Should the SPD identify practicality exceptions to providing affordable housing on site?

- Yes
- No

Q4b: If you answered 'Yes' to question 4a, please specify what practicality exceptions these should be.

Q4c: Please provide any views you have on the minimum number of 10 Registered Providers (including the council's housing team) being suggested.

Q4d: Please provide any comments you have on whether off-site commuted sums or on-site low-cost home ownership products should be required where practicality issues are accepted.

5. MEETING THE 30% of SP5

Q5a: Please state your preferred option (1-3).

Option 1 - That to meet the policy requirements of 30% it is expected that the numbers on site will always be rounded up to the nearest whole unit

Option 2 - Accept financial contributions to cover part units, where it is less than 0.5 of the unit. This would only apply where the resulting 30% is less than 0.5 of a unit. Those 0.5 or above, would still need to provide the rounded up whole unit amount

Option 3 - Accept financial contributions to cover part units of all sizes (0.1 to 0.9 of a unit)

Q5b: Please state option preferred in question 5a and explain choice.

Q5c: Please provide any other suggestions for how the delivery of part unit requirements could be addressed.

6. WHEN SHOULD AFFORDABLE HOUSING DETAILS BE AGREED?

Q6a: Should the SPD require that in most cases (*this would not include certain types of application such as Outline or Permission in Principle*) the detail of Affordable Housing unit location, mix and tenure should be agreed with the council at pre-application stage to be submitted with the application, or at the latest application stage prior to decision?

- Yes
- No

Q6b: If you answered 'No' to question 6a, please explain why not.

Q6c: Should the SPD include guidance and provision for including a 'Cascade Mechanism' in decisions and S106 agreements?

- Yes
- No

Q6d: If you answered 'Yes' to question 6c, please explain.

Q6e: Please provide any comments you have on the specific proposals for the cascade mechanism.

7. CALCULATION OFF-SITE CONTRIBUTIONS

Q7a: Which financial contribution calculation option do you consider most appropriate/practical?

- Option 1a**
- Option 1b**

- Option 2
- Option 3
- Other

Q7b: Please set out any comments you have to explain your answer to Q7a.

8. DEFERRED CONTRIBUTIONS

Q8a: Which form of re-appraisal do you consider most appropriate?

- a full viability re-appraisal?
- monitoring of the sales values?
- other

Q8b: For monitoring of sales values, do you have any suggestions on the % of uplift that should form the financial contribution?

Q8c: Please provide comments on the timing and stages of the re-appraisal.

Q8d: Are there any exceptions to requiring re-appraisal for deferred contributions? *Please specify*

9. OTHER INFORMATION IN THE SPD

Q9a: Please provide any comments you have on the matters a) to m) proposed to be included in the SPD.

Q9b: Are there any other topic areas the SPD needs to cover?

- Yes
- No

Q9c: If you answered 'Yes' to question 9b then please provide details.

Thank you for completing this survey.

We will carefully consider all comments and feedback made at this early engagement stage and commence production of a draft version of the SPD with our preferred options set out. This draft SPD will be available for a full public consultation, for a minimum of 4 weeks, as required by legislation and set out in our SCI.

As part of this, a consultation document will be produced setting out how comments received as part of this engagement stage were considered.

We anticipate this consultation will be held in Spring 2026.

Please contact us if you have any questions or if you wish to be removed from our database. planning.policy@dover.gov.uk

Signature:

Date:

Print name:

Appendix 3 – Stakeholder Engagement FAQs

Draft Affordable Housing Supplementary Planning Document (SPD) FAQs

The Council has prepared a draft Supplementary Planning Document (SPD) to support the delivery of the adopted Affordable Housing Policy (Policy SP5 of [Dover District Local Plan to 2040](#)) and other related policies.

The SPD is intended to provide guidance and advice on how the policies should be implemented in practice through the planning process. It will replace the current adopted [Affordable Housing SPDs, First Homes Position Statement and the 2002 Local Exception SPG](#).

This consultation is seeking views on 12 Guidance Notes contained within the SPD in relation to the practical implementation of Policy SP5, taking into account recent changes in national policy and national issues with delivery of affordable housing.

What is Affordable Housing?

Affordable housing includes homes for sale or rent and is for people whose needs are not met by the private market. The Government's National Planning Policy Framework (NPPF) defines the types (tenures) of affordable housing [here](#).

The majority of affordable housing is owned and managed by registered providers (RP). There are three main types of RPs: not for-profit RPs (known as Housing Associations), for profit RPs and local authorities (the Council's housing team). The activities of RPs are overseen by the Regulator of Social Housing. Other types of affordable home ownership products such as Discount Market Sale or First Homes can be brought forward by developers themselves.

Securing affordable housing in the district is a priority of the Council, and the provision of affordable housing secured through new development is a significant and important contributor to this, alongside the Council's own delivery.

What are Supplementary Planning Documents?

Supplementary Planning Documents (SPDs) provide more detailed advice or guidance in relation to policies in the adopted Local Plan.

They usually focus on a particular issue – e.g., Affordable Housing, or a geographical area and are intended to help with the interpretation and implementation of our planning policies.

Once they are adopted, they are a material consideration in the determination of planning applications. Planning officers and the planning committee will look at whether development proposals are consistent with the advice in relevant SPDs when

assessing planning applications and deciding whether planning permission should be granted.

Are SPDs being replaced?

Yes, it is intended that SPDs will be replaced with Supplementary Plans in the future as a new Plan making system is being brought in by the government.

The legislation states that any new SPDs being brought forward under the legacy (outgoing) system must be adopted by 30 June 2026. It is the Council's intention to meet this deadline.

SPDs adopted by this deadline will remain in force until the local planning authority adopts a new-style local plan. DDC does not yet have a timetable for producing a plan in the new system and this SPD will support the current adopted Local Plan.

Consultation on SPDs

The [Statement of Community Involvement \(SCI\) 2025](#) sets out how we will engage on SPDs as they are being prepared. **This stage is the formal 4-week consultation period, where we invite comments from all interested parties.** We are particularly interested in the views of local stakeholders, developers and agents and Registered Providers of Affordable Housing.

What is included in the draft SPD?

The SPD includes 12 guidance notes that seek to address current issues and challenges in delivering affordable housing. In summary they cover:

1. Calculating 30% of development

Policy SP5 requires 30% on-site affordable housing on qualifying schemes. This can result in part unit requirements. This guidance note sets out that the calculation will be rounded to the nearest whole number (i.e. down for less than .5 and up for .5 or over).

2. Flexibility in Tenure Mix

Policy SP5 sets specific percentages for the tenure mix of affordable housing required. It is not flexible and requires a full viability appraisal to be submitted if that specific tenure mix is not achieved. The Government has made changes to the NPPF in relation to affordable housing tenures since the Local Plan was adopted.

To be more flexible on tenure mix changes where the proposal delivers 30% on-site, this guidance note sets out other tenure mixes that would be acceptable to the council without the need for a viability appraisal.

3. Housing Size, Design and Layout

This guidance note requires consideration of affordable housing needs to inform the housing size, design and layout of a scheme and recommends early engagement with

the council, with the aim of delivering schemes to meet local needs and that the council's housing team or a Registered Provider can take on.

4. Evidence of Practicality Issues in delivery

Policy SP5 does not allow for consideration of practical issues that make it impossible to meet the policy requirements, such as where there is no interest from any Registered Provider. This guidance note acknowledges these issues may exist and sets out the evidence that is required to demonstrate the issue. If this position is accepted, the council will consider an off-site financial contribution and/or alternative low-cost home ownership product.

5. Viability Appraisals

Policy SP5 already sets out flexibility where a scheme is demonstrated to be unviable, with a series of options to change the affordable housing requirements. This guidance note adds information on what is expected in viability appraisals submitted to the council, including who should prepare them, what they should contain and how they will be reviewed.

6. When and how to agree Affordable Housing details

This guidance note sets out what information is expected to be provided with planning applications in relation to affordable housing on development proposals, for different types of applications.

7. Self and Custom Build Schemes

This guidance note confirms that schemes that include this house type are still required to meet the SP5 requirements and that these types of properties do not count towards meeting affordable housing needs.

8. Specialist and Older Persons Housing Schemes

This guidance note clarifies that all schemes that fall within C3 uses are required to provide affordable housing and that some C2 uses, which may, for example, include age restricted dwellings or units which are independent even with a level of care provision, are required to contribute to affordable housing provision.

9. Formula for calculating off-site contributions

The current SPD formula, requiring a contribution of 5% of the Gross Development Value (GDV) is not providing sufficient funding to enable the council to deliver an equivalent number of affordable units off-site. This guidance note proposes increasing the requirement from 5% to 10% of GDV.

10. Deferred Contributions

In cases where viability appraisal evidence has been accepted and affordable housing has been removed or reduced on a scheme, this guidance notes set out the requirement for a review mechanism (often referred to as claw back). It requires that once the houses are built, a review of the actual sales values is carried out, and a

proportion of any increase is paid to the Council to contribute to the delivery of affordable housing.

11. Keeping Shared Ownership in Perpetuity

This guidance note intends to prevent shared ownership properties secured through development from staircasing to 100% property ownership in certain areas of the district (Designated Protected Areas). This is intended to keep these properties available as affordable housing in perpetuity in the locations they are most needed and not allow them to become part of open market housing.

12. Rural Local Needs Housing

Policy H2 in the Local Plan applies to local needs housing applications, where they are proposed by local parish councils or community groups and are permitted where they are meeting evidenced local needs. This note adds some detail to that policy in relation to how to undertake a local housing needs assessment and how cross market subsidy is considered.

How do I respond and when is the deadline?

You can view the documents online here in our [consultation portal](#). Alternatively, there are hard copies of the documents and comment forms available at a number of locations. Please see the [Statement of Representation Procedure](#) for more information.

We are inviting comments specifically on the 12 guidance notes, and there is also an option to comment on other parts of the draft SPD.

The consultation period is open until midnight on Thursday 14th May 2026.

What happens next?

We will carefully consider all comments and feedback and commence production of a final version of the SPD. This will be presented to cabinet and council for adoption in June. As part of this, the consultation statement will be updated setting out how comments received as part of this engagement stage were considered and taken into account in the final version of the SPD.

Following adoption, the SPD will be available on the council's website and will be used to help determine planning applications as a 'material consideration'.

Appendix 4 – Stakeholder Engagement – Invited Participants

Developers	
Abbey Developments	Jarvis Homes
Amour Property	Jenner Group
BDW Homes	Karl Lee Construction
Bellway	KR Planning
Cameron Lettings	Lee Evans
Chartway Group	Martin & Co Dover
City Court Developments	Midvalley
Colebrook Sturrock	Ogi Properties
Court Developments	Pentland Homes
Dandara	Persimmon Homes
DHA Planning	Quinn Estates
DHA Planning	Richborough Estates
East Kent Spatial Development Company	Savills
Elgars	Stantec
Esquire Developments	Strutt and Parker
Fernham Homes	Sunning Dale House
Hume Planning	Tetlow King

Agents		
APX Architecture	Finns	Manse Designs
Bloomfield Ltd	Gary Laslett	Michael Collins Architects
CAD Solutions	GPM2 Design Architecture and Surveying	Nigel Bonnage
Cason Green	Halshaw Architecture	OSG Architecture
CDP Architecture	HCUK Group	Planning Issues Ltd
CEA Architects	HCUK Group	RD Architects
Chart Way Group	Historic Building Advisors	Rebus Planning
Clague Architects	Hobbs Parker	Red House Design
Clive Alexander	Ian Barber Associates	Red House Design
Clive Taylor Architecture	John Elvidge Planning Consultancy	Roger Joyce Associates
Clive Tidmarsh	JP Planning	Smith Group
Colebrook Sturrock	JPD Architecture	Sterling Architecture
Cyma Architects	Julian Sinstadt, Chartered Building Engineer	TG Designer Homes
DHA Planning	Lander Planning	The MPL Group
Duncan Graham	Le Valliant Owen	Tilby Design Ltd
E.K.Drawing Service Ltd	LGIM Real Assets	Tony Michael Consulting
Ez-Plans	Ltd Services	Town Planning Consulting
	M.J.Gulvin - Architects	Tridax

Appendix 5 – Stakeholder Engagement – Full Comments

Following the Stakeholder Engagement, full comments can be [viewed](#) here.

Weblink: www.dover.gov.uk/Planning/Planning-Policy/Affordable-Housing-SPD-Responses-Dec-2025.XLS

(Link provided to excel file - If you wish to view in hard copy please email planning.policy@dover.gov.uk)

Appendix 6 - Statement of representation procedure



Dover District
Local Plan

Statement of Representations Procedure and Notification of Period of Representations under Regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Document Title: Draft Affordable Housing Supplementary Planning Document (SPD)

Including Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination and Consultation Statement.

The Council has prepared a draft Supplementary Planning Document (SPD) to support the delivery of the adopted Affordable Housing Policy (Policy SP5 of Dover District Local Plan to 2040) and other related policies. The SPD is intended to provide guidance and advice on how the policies should be implemented in practice through the planning process.

Upon adoption, it will replace the current adopted Affordable Housing SPDs, First Homes Position Statement and the 2002 Local Exception SPG.

This consultation is seeking views on 12 Guidance Notes contained within the SPD in relation to the practical implementation of policies, taking into account recent changes in national policy and national issues with delivery of affordable housing.

The SPD will be a material consideration in the determination of planning applications (once adopted).

Period of Representations:

Comments can be made between Tuesday 14th April and **midnight on Thursday 14th May 2026.**

Representations (comments) received after this time will not be accepted.

Document Availability:

During the representation period, the consultation documents and all supporting documents will be available to view online via the web address: [News and planning consultations Consultation Home - Keystone](#)

Paper copies of the consultation documents will be available at the following locations:

Location	Address
Council Offices	White Cliffs Business Park, Whitfield
Deal Library	Broad Street
Dover Library	Dover Discovery Centre, Market Square
Sandwich Library	13 Market Street

The Council Offices at Whitfield are open Monday to Friday 10am-4pm, while library opening times can be checked online at www.kent.gov.uk/libraries

If you need a copy of a document in paper form, or an alternative format (such as large print or other language) please contact us: 01304 872244 or planning.policy@dover.gov.uk

How to submit a representation (comment):

Representations must be made on the standard representation forms.

Representations are encouraged to be made through the Council's online consultation portal (<https://dover-consult.objective.co.uk/kse>) where you can view the Draft Supplementary Planning Document (SPD), Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination and the Consultation Statement.

A paper copy of the representation forms and guidance notes can also be provided on request by contacting the team using the information below, or by collecting from the Council offices, one of the libraries listed above during opening hours.

Paper copies of representation forms should be returned to: Planning Policy and Projects, Dover District Council, White Cliffs Business Park, Dover, Kent. CT16 3PJ

Please note that your representation will be publicly available, and a copy will be published on the Council's website. Your representations and name/name of your organization, comments and town of residence will be published, but other personal information will remain confidential. Data will be processed and held in accordance with the Data Protection Act 2018. A privacy notice with further information can be found here: www.dover.gov.uk/Website/PDFs/Planning-Policy-Privacy-Notice.pdf

All representations must be received by **midnight on Thursday 14th May 2026**.

What happens next?

After the consultation ends, we will consider all the comments received and make changes to the document where necessary. A summary of the comments received and how they've been taken into account will be presented to Cabinet and Full Council alongside the final SPD. Once adopted, the SPD will be a material consideration and will be used when assessing planning applications.

Notification request:

Using the representation forms you can request to be notified at an address or email address of any future updates to the Supplementary Planning Document.

For assistance or further information:

- Visit: [News and planning consultations](#)
- Email: planning.policy@dover.gov.uk
- Call: 01304 872244

Appendix 7 – Public consultation social media records

Planning & Development Newsletter

Affordable Housing Supplementary Planning Document – consultation coming soon

A draft Affordable Housing Supplementary Planning Document (SPD) has been prepared and is due to go out for public consultation in April.

The SPD is intended to provide guidance on how Local Plan policy SP5 - Affordable Housing and other related policies, should be implemented in practice, through a series of guidance notes. It also addresses changes to the National Planning Policy Framework (NPPF) in relation to Affordable Housing and how these will be considered alongside the Local Plan policy.

The SPD is planned for adoption before the national deadline of 30 June 2026 as set out in national legislation.





Draft Affordable Housing Supplementary Planning Document – have your say

A draft Affordable Housing Supplementary Planning Document (SPD) has been prepared - and your views are sought.

The SPD has been developed to provide help and advice on how affordable housing should be delivered through the planning system. It aims to provide guidance on the implementation of Local Plan Policy SP5 – Affordable Housing, and other policies around the delivery and design of affordable housing. It also addresses changes to the National Planning Policy Framework (NPPF) on affordable housing.

The document sets out a series of 12 guidance notes for applicants when considering the affordable housing requirements for their scheme.

The consultation will end at **midnight on Thursday, 14th May 2026**.

For more information, or to have your say, please see the planning policy pages on the DDC website at www.dover.gov.uk/Planning/Planning-Policy/News-and-planning-consultations.aspx

[Home](#) > Consultation

Have Your Say - Consultations

Current consultations/engagement



Draft Affordable Housing Supplementary Planning Document

A draft Affordable Housing Supplementary Planning Document (SPD) has been prepared - and your views are sought. The consultation will end at **midnight on Thursday, 14th May 2026**. For more information or to have your say, please see the [Planning Policy](#) pages.

News and planning consultations

Latest News

Draft Dover District Council Affordable Housing Supplementary Planning Document (SPD) - Consultation open Tuesday 14 April to midnight Thursday 14 May 2026

A draft Affordable Housing Supplementary Planning Document (SPD) has been prepared - and your views are sought.

[Consultation Home - Keystone](#)

The SPD has been developed to provide help and advice on how affordable housing should be delivered through the planning system. It aims to provide guidance on the implementation of Local Plan Policy SP5 - Affordable Housing, and other policies around the delivery and design of affordable housing. It also addresses changes to the National Planning Policy Framework (NPPF) on affordable housing.

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- » [Draft Affordable Housing Document \(SPD\)](#)
- » [Consultation Statement](#)
- » [Statement of Representations Procedure and Notification of Period of Representations](#)
- » [SEA HRA Screening Assessment](#)
- » [FAQS](#)

This consultation will end at **midnight on Thursday, 14th May 2026**



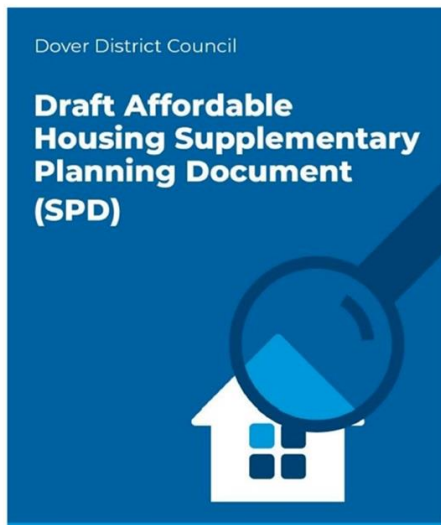
Dover District Council

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A draft Affordable Housing Supplementary Planning Document (SPD) has been prepared - and your views are sought. The deadline for comments is 14 May ...more



April 2026 Consultation Version



Like



Comment



Repost



Send

Appendix 8 – Public Consultation Questionnaire



Dover District
Local Plan

Dover District Council

Draft Affordable Housing Supplementary Planning Document (SPD) Consultation

REPRESENTATION FORM

This is the comments form to be used for commenting on the following documents:

1. Draft Affordable Housing Supplementary Planning Document (SPD)
2. Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination
3. Draft SPD Consultation Statement

The preferred method for receiving comments is on-line by using the consultation portal which can be found at <https://dover-consult.objective.co.uk/kse>. If you are unable to use the on-line method of submitting comments, you may still submit comments by using this form.

Please note that all the representations received will be made public (please refer to the guidance notes below).

Please complete all sections of the form. If you do not provide name and contact information, we will not be able to accept the representation. Please email to planning.policy@dover.gov.uk or post to Planning Policy, Council Offices, Whitfield, White Cliffs Business Park, Dover CT16 3PJ

Forms must be received by midnight on Thursday 14th May 2026.

Personal Details

Full Name and title:

Organisation (*where relevant*):

Address:

..... Postcode:

Email address: Daytime Tel. No:

Agents Details

Please give the agent's details if one is appointed on your behalf (note they will become the main contact)

Name and Organisation:

Address:

..... Postcode:

Email address: Daytime Tel. No:

1. Do you have any comments on the 12 Guidance Notes contained in the draft SPD? Please state if you support / object or consider there to be an omission.

Please state the relevant Guidance Note that you are referring to in your response.

2. Do you have any comments to make on any other part of the draft SPD? Please state if you support / object or consider there to be an omission.

Please state the relevant page numbers/chapter/paragraph number that you are referring to and the reason(s) for your decision.

(Attach additional sheets if necessary)

3. Is there any other information that you think would be useful for us to include in the SPD and/or its Appendices?

4. Do you have any comments on the SPD's supporting documents:- Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination and the Consultation Statement?

Please state the relevant supporting document page/chapter/paragraph number in your response.

5. Please indicate if you wish to be notified of the Council's decision on whether to make (adopt) the Draft Affordable Housing Supplementary Planning Document (SPD) and supporting documents.

Yes

No

Signature:

Date:

Print name:

Guidance notes for submitting a representation

ALL RESPONSES MUST BE RECEIVED BY: midnight on Thursday 14th May 2026.
Dover District Council may not accept your representation if it is received later than this date.

1. Using the representation form.

We are encouraging everyone to use the online Consultation Portal <https://dover-consult.objective.co.uk/kse>. This has a number of benefits, including being quick and easy to use and will save time as you only need to complete personal details once. Guidance is available on the portal that will assist you. Paper copies of the representation forms (or alternative formats, such as large print) can be requested by telephoning 01304 872244.

Further background information can be found <https://www.dover.gov.uk/Planning/Planning-Policy/News-and-planning-consultations.aspx>

2. How long do I have to make a representation?

Comments can be made any time during the consultation period. Please make your submission as soon as possible during this period. Please note that representations received after the end date cannot be accepted and will not be valid.

3. What will happen to my representation?

After the consultation ends, we will consider all the comments received and make changes to the document where necessary. A summary of the comments received and how they've been taken into account will be presented to Cabinet and Full Council alongside the final SPD. Once adopted, the SPD will be a material consideration and will be used when assessing planning applications.

4. Where should I send my hard copy form?

Planning Policy, Dover District Council, Council Offices, White Cliffs Business Park
Dover, Kent CT16 3PJ Email: planning.policy@dover.gov.uk

Please read the data protection and privacy statement before submitting a response.

Please note that your representation will be publicly available, and a copy will be published on the Council's website. Your representations and name/name of your organisation, comments and town of residence will be published, but other personal information will remain confidential.

Data will be processed and held in accordance with the Data Protection Act 2018. The Corporate and Planning Policy Privacy Notices can be viewed via the following link: www.dover.gov.uk/privacy

Please confirm you have read

Appendix 9 – Public Consultation – Invited Participants

Sent by email to:

- All statutory consultees
- All Town and Parish Councils in the district
- Ward Members
- Stakeholders registered to the councils planning consultation portal
- Developers/Agents on the councils forum
- Registered Providers on the housing department database

1 **From:** PlanningPolicy <Planning.Policy@DOVER.GOV.UK>

Sent: 15 April 2026 10:05

Subject: DOVER DISTRICT COUNCIL - draft Dover District Council Affordable Housing Supplementary Planning Document (SPD) Consultation

Good morning

I am writing to let you know that consultation on the Council's **draft Dover District Council Affordable Housing Supplementary Planning Document (SPD)** and supporting documents *Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination (August 2025) and Consultation Statement* is live and your views are sought on the document.

The consultation commences **Wednesday 14th April until midnight on Thursday, 14 May 2026.**

All documents can be viewed on the consultation portal at <https://dover-consult.objective.co.uk/kse/>.

Please submit your comments wherever possible via this [consultation portal](#).

If you wish to view a paper copy, and return a comment form by post, these are available from the council offices in Whitfield and at libraries in the District in Deal, Dover, Sandwich. They should be completed and returned by post to:

Planning Policy, Dover District Council, White Cliffs Business Park, Dover, Kent CT16 3PJ

All comments received will be considered once the consultation has closed.

Amendments will then be made to the SPD, where necessary, prior to adoption.

You are receiving this communication because you have registered an interest in planning issues in the Dover District, or you have been identified as a key stakeholder in relation to this topic.

Please email planning.policy@dover.gov.uk if you no longer wish to be contacted regarding consultations on Planning department documents.

Kind Regards

Carly Pettit
Planning Policy Team Leader

2 Reminder Email:

From: PlanningPolicy <Planning.Policy@DOVER.GOV.UK>
Sent: 30 April 2026 15:28
Subject: DOVER DISTRICT COUNCIL - draft Dover District Council Affordable Housing Supplementary Planning Document (SPD) Consultation

Good afternoon,

Further to my previous email, I would like to remind you that the Council's **draft Dover District Council Affordable Housing Supplementary Planning Document (SPD)** and supporting documents *Strategic Environmental Assessment (SEA) Screening Determination and Habitat Regulations Assessment (HRA) Screening Determination (August 2025) and Consultation Statement* is live and your views are sought on the document.

The consultation commenced on Wednesday 14th April and will close midnight on Thursday, 14 May 2026.

All documents can be viewed on the consultation portal at <https://dover-consult.objective.co.uk/kse/>.

Please submit your comments wherever possible via this [consultation portal](#).

We look forward to receiving your comments.

Kind Regards

Carly Pettit
Planning Policy Team Leader

- 3 From: PlanningPolicy <Planning.Policy@DOVER.GOV.UK>**
Sent: 08 May 2026 11:29
To:
Subject: Dover District Council - Consultation on Draft Affordable Housing SPD - closing soon

We are contacting the Registered Providers who operate in the Dover area to remind you of this consultation on the SPD. We thought it might be helpful to summarise some of the key Guidance Notes in the draft SPD that might be of interest to you.

Guidance Note 3 - Housing Size, Design and Layout - encourages applicants to engage early in the planning process with the housing team and Registered Providers to ensure that the affordable housing units proposed, are the right types of units and designed in the right areas of the scheme so that they meet the requirements to receive offers. In addition, it adds flexibility to a requirement for tenure-blind development, where an RP has indicated it will aid management of the units (such as flatted developments).

Guidance Note 4 - Evidence of Practicality Issues in Delivery - requires applicants to provide copies of communications with Registered Providers in relation to why a scheme may not be suitable for offers from Registered Providers.

Guidance Note 6 - When and how to agree Affordable Housing Details - encourages early engagement on schemes where Affordable Housing is to be provided and sets out details that will be required to be submitted alongside different types of planning application.

Guidance Note 11 - Keeping Shared Ownership in perpetuity - this sets out how the council are intending to prevent Shared Ownership properties from staircasing to 100% ownership in the Designated Protected Areas, for all stock, not just those funded by Homes England Grant.

SPD FAQs are here [AFFHSG2.PDF](#) which summarise all of the 12 Guidance Notes and how to take part in the consultation, which can be viewed and commented on here. [Consultation Home - Keystone](#)

The consultation closes at **midnight on Thursday 14th May and we welcome your views.**

Kind Regards

Carly Pettit
Planning Policy Team Leader

4 From: PlanningPolicy <Planning.Policy@DOVER.GOV.UK>

Sent: Friday, May 08, 2026 11:59

To: (Developers previously commented on SPD)

Subject: Dover Council Affordable Housing SPD - Consultation reminder

Good afternoon,

I am contacting you as you previously provided helpful comments on the early engagement for this SPD and options we were considering, and we would very much appreciate your comments on the current draft version of the SPD and the 12 Guidance notes within it.

SPD FAQs are here [AFFHSG2.PDF](#) which summarise all of the 12 Guidance Notes and how to take part in the consultation, which can be viewed and commented on here: [Consultation Home - Keystone](#)

The consultation closes at **midnight on Thursday 14th May** and we welcome your views.

Thank you for your time.

Kind Regards

Carly Pettit

Planning Policy Team Leader

Appendix 10 – Public Consultation – FAQs

Draft Affordable Housing Supplementary Planning Document (SPD) FAQs

The Council has prepared a draft Supplementary Planning Document (SPD) to support the delivery of the adopted Affordable Housing Policy (Policy SP5 of [Dover District Local Plan to 2040](#)) and other related policies.

The SPD is intended to provide guidance and advice on how the policies should be implemented in practice through the planning process. It will replace the current adopted [Affordable Housing SPDs](#), [First Homes Position Statement](#) and the [2002 Local Exception SPG](#).

This consultation is seeking views on 12 Guidance Notes contained within the SPD in relation to the practical implementation of Policy SP5, taking into account recent changes in national policy and national issues with delivery of affordable housing.

What is Affordable Housing?

Affordable housing includes homes for sale or rent and is for people whose needs are not met by the private market. The Government's National Planning Policy Framework (NPPF) defines the types (tenures) of affordable housing [here](#).

The majority of affordable housing is owned and managed by registered providers (RP). There are three main types of RPs: not-for-profit RPs (known as Housing Associations), for-profit RPs and local authorities (the Council's housing team). The activities of RPs are overseen by the Regulator of Social Housing. Other types of affordable home ownership products such as Discount Market Sale or First Homes can be brought forward by developers themselves.

Securing affordable housing in the district is a priority of the Council, and the provision of affordable housing secured through new development is a significant and important contributor to this, alongside the Council's own delivery.

What are Supplementary Planning Documents?

Supplementary Planning Documents (SPDs) provide more detailed advice or guidance in relation to policies in the adopted Local Plan. They usually focus on a particular issue – e.g., Affordable Housing, or a geographical area and are intended to help with the interpretation and implementation of our planning policies.

Once they are adopted, they are a material consideration in the determination of planning applications. Planning officers and the planning committee will look at whether development proposals are consistent with the advice in relevant SPDs when assessing planning applications and deciding whether planning permission should be granted.

Are SPDs being replaced?

Yes, it is intended that SPDs will be replaced with Supplementary Plans in the future as a new Plan making system is being brought in by the government.

The legislation states that any new SPDs being brought forward under the legacy (out-going) system must be adopted by 30 June 2026. It is the Council's intention to meet this deadline.

SPDs adopted by this deadline will remain in force until the local planning authority adopts a new-style local plan. DDC does not yet have a timetable for producing a plan in the new system and this SPD will support the current adopted Local Plan.

Consultation on SPDs

The [Statement of Community Involvement \(SCI\) 2025](#) sets out how we will engage on SPDs as they are being prepared. **This stage is the formal 4-week consultation period, where we invite comments from all interested parties.** We are particularly interested in the views of local stakeholders, developers and agents and Registered Providers of Affordable Housing.

What is included in the draft SPD?

The SPD includes 12 guidance notes that seek to address current issues and challenges in delivering affordable housing. In summary they cover:

1. Calculating 30% of development

Policy SP5 requires 30% on-site affordable housing on qualifying schemes. This can result in part unit requirements. This guidance note sets out that the calculation will be rounded to the nearest whole number (i.e. down for less than .5 and up for .5 or over).

2. Flexibility in Tenure Mix

Policy SP5 sets specific percentages for the tenure mix of affordable housing required. It is not flexible and requires a full viability appraisal to be submitted if that specific tenure mix is not achieved. The Government has made changes to the NPPF in relation to affordable housing tenures since the Local Plan was adopted.

To be more flexible on tenure mix changes where the proposal delivers 30% on-site, this guidance note sets out other tenure mixes that would be acceptable to the council without the need for a viability appraisal.

3. Housing Size, Design and Layout

This guidance note requires consideration of affordable housing needs to inform the housing size, design and layout of a scheme and recommends early engagement with the council, with the aim of delivering schemes to meet local needs and that the council's housing team or a Registered Provider can take on.

4. Evidence of Practicality Issues in delivery

Policy SP5 does not allow for consideration of practical issues that make it impossible to meet the policy requirements, such as where there is no interest from any Registered Provider. This guidance note acknowledges these issues may exist and sets out the evidence that is required to demonstrate the issue. If this position is accepted, the council will consider an off-site financial contribution and/or alternative low-cost home ownership product.

5. Viability Appraisals

Policy SP5 already sets out flexibility where a scheme is demonstrated to be unviable, with a series of options to change the affordable housing requirements. This guidance note adds information on what is expected in viability appraisals submitted to the council, including who should prepare them, what they should contain and how they will be reviewed.

6. When and how to agree Affordable Housing details

This guidance note sets out what information is expected to be provided with planning applications in relation to affordable housing on development proposals, for different types of applications.

7. Self and Custom Build Schemes

This guidance note confirms that schemes that include this house type are still required to meet the SP5 requirements and that these types of properties do not count towards meeting affordable housing needs.

8. Specialist and Older Persons Housing Schemes

This guidance note clarifies that all schemes that fall within C3 uses are required to provide affordable housing and that some C2 uses, which may, for example, include age restricted dwellings or units which are independent even with a level of care provision, are required to contribute to affordable housing provision.

9. Formula for calculating off-site contributions

The current SPD formula, requiring a contribution of 5% of the Gross Development Value (GDV) is not providing sufficient funding to enable the council to deliver an equivalent number of affordable units off-site. This guidance note proposes increasing the requirement from 5% to 10% of GDV.

10. Deferred Contributions

In cases where viability appraisal evidence has been accepted and affordable housing has been removed or reduced on a scheme, this guidance notes set out the requirement for a review mechanism (often referred to as claw back). It requires that once the houses are built, a review of the actual sales values is carried out, and a proportion of any increase is paid to the Council to contribute to the delivery of affordable housing.

11. Keeping Shared Ownership in Perpetuity

This guidance note intends to prevent shared ownership properties secured through development from staircasing to 100% property ownership in certain areas of the district (Designated Protected Areas). This is intended to keep these properties available as affordable housing in perpetuity in the locations they are most needed and not allow them to become part of open market housing.

12. Rural Local Needs Housing

Policy H2 in the Local Plan applies to local needs housing applications, where they are proposed by local parish councils or community groups and are permitted where they are meeting evidenced local needs. This note adds some detail to that policy in relation to how to undertake a local housing needs assessment and how cross market subsidy is considered.

How do I respond and when is the deadline?

You can view the documents online here in our [consultation portal](#). Alternatively, there are hard copies of the documents and comment forms available at a number of locations. Please see the [Statement of Representation Procedure](#) for more information.

We are inviting comments specifically on the 12 guidance notes, and there is also an option to comment on other parts of the draft SPD.

The consultation period is open until midnight on Thursday 14th May 2026.

What happens next?

We will carefully consider all comments and feedback and commence production of a final version of the SPD. This will be presented to cabinet and council for adoption in June. As part of this, the consultation statement will be updated setting out how comments received as part of this engagement stage were considered and taken into account in the final version of the SPD.

Following adoption, the SPD will be available on the council's website and will be used to help determine planning applications as a 'material consideration'.