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**From:** Ed Brown [REDACTED]  
**Sent:** 08 May 2019 16:30  
**To:** Planning Policy  
**Subject:** Draft Affordable Housing Supplementary Planning Document

Dear Sir/Madam,

In response to the current consultation on the Draft Affordable Housing Supplementary Planning Document please find my comments below:

Having carefully read the draft document I question how reasonable paragraphs 3.14 & 3.15 are which come under the heading of *“What is an overage clause, and when does it apply?”* Would the Council accept this principle in reverse? If the developer makes less than expected profit will the Council cover 50% of the loss of profit? All the risk is with the Developer. There is no risk with the Council, yet if the market is better than expected the Council wants 50% of any additional profit. This is one side and should be dropped from the draft wording.

Turning to paragraph 5.7 it is stated that clusters should be no more than 10. This is modest for a cluster size. Many other South West planning departments use a figure of 12. At the end of this paragraph it is stated that affordable housing within each cluster should include a mix of tenures. Registered Providers prefer to separate the tenures because of management and maintenance issues. In addition the reason used by this document in para 5.3 applies to my mixed tenure concerns. This requirement should be omitted.

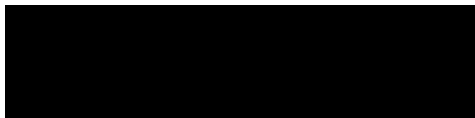
Sticking with cluster sizes figure 5.1 is misleading. The largest cluster in figure 5.1 is 7 in total which is contrary to the figure of 10 (which should be greater in any case) in paragraph 5.7. The clusters shown should all be greater (therefore reducing the number of clusters) and is not in accordance with the policy wording. A more accurate example should be provided.

I hope you find the above comments useful and are able to take them on board when re-drafting the document.

Yours sincerely,

Ed  
**Ed Brown**  
**Development Manager**

**The Cavanna Group of Companies**



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