

Providing for Housing Choice Supplementary Planning Document and Planning Guidance

Comments made during the Informal Consultation Stage:

12th October – 9th November 2007

(Paragraph numbers in the text refer to the draft version of the SPD used during the informal stage of the consultation process)

| Mrs Elaine Wright, East Manchester Resident (Comments made in September 2007 on the July Executive Report) | | |
|---|--|--|
| Summary We need an alternative to flats, such as bungalows, to encourage elderly people to move out of 3 or 4 bed family-sized RSL properties. Although bungalows take up as much room as a 3-bed house this is what residents want. | | Response Agree: A range of property sizes is needed including high quality accommodation for elderly people. A reference to the housing needs of elderly people has been inserted into Para 5.27 |
| Councillor Peter Morrison | | |
| Summary 1) Raising household income may be vital to Manchester's regeneration but should not mean unrestricted house purchase prices. | | Response Agree: – the SPD is trying to ensure provision of affordable housing through joint equity and other financial solutions. It is only one mechanism; others include increasing access to training and employment opportunities to tackle worklessness and support economic growth. |

| | |
|---|---|
| 2) It is not feasible to relocate all of the elderly people who are under-occupying larger family houses because the inducements that would need to be offered would be too great for the Council to afford. | The SPD is intending to ensure that attractive affordable housing is provided in the City so that alternative housing solutions are provided for people living in under-occupied housing |
| 3) Are council houses being transferred because this is the only way of obtaining funding from central government? | The SPD is in response to national housing policy and changing market conditions. This point is beyond the scope of the policy. |
| Michael Hodge, Architectural Liaison, Greater Manchester Police | |
| Summary Would like a reference to affordable housing being constructed to the standards of Secured By Design. | Response All developments have to comply with the Guide to Development in Manchester SPD & Planning Guidance, as stated in paragraph 5.35 –the Guide refers to Secured by Design (quote). Reference to SBD will be put into the developers' competition – Action: Amend 2.4 to state that housing “will be constructed to the highest design standard” after £25k income housing in Para 2.4. |
| Lynne Robertson, Ladybarn Resident | |
| Summary 1. SPD policy should not only aim at improving the availability of housing stock to create neighbourhoods of choice – but needs to address the factors set out in 3.10 that will create a quality local environment. | Response The SPD is only looking at widening the choice of and access to housing stock, therefore does not address all of the other factors, which contribute to creating neighbourhoods of choice. A range of policies covering these other factors will be set out in the Core Strategy. |
| 2. How many sites over 0.3 Ha do we have available to deliver affordable housing especially in areas with a high FTB affordability ratios? | The Council has followed national guidance in Planning Policy Statement 3 which sets an indicative minimum of 15 units. This equates to a threshold of 0.3 hectares based on a density of 50 dwelling per Ha which is included to ensure that development on low density sites (over 0.3 Ha but less than 15 dwellings) contribute to providing affordable housing. It is not possible to lower this threshold to encompass more sites, as it is not economically viable to provide affordable housing on smaller sites where there are less than 15 dwellings. |

| | |
|---|--|
| <p>3. The preferred dwelling size mix given in Table 3 does not correspond with the need identified in the Housing Needs Survey for more 3 and 4 bed houses for overcrowded households, instead the affordable housing provision seems to be aimed at singles and couples rather than families.</p> | <p>The figures in the table represent a first attempt at setting a preferred dwelling mix. 43% of the provision is to be for 3bed+ units. The figures will be monitored to ensure that this is the correct mix in practice and will be reviewed as appropriate. It reflects a balance between the need to provide for larger families in the future and the necessity of ensuring development is financially viable as well as providing for smaller newly forming households. This accords with the conclusion in 6.16 of the Housing Needs Assessment report and figures from the Housing Waiting List.</p> |
| <p>4. Agree with the approach to making developments tenure blind so that you could not tell which units were affordable housing – very important.</p> | <p>Support welcomed.</p> |
| <p>5. The Council should not leave it up to the developer for information on how much affordable housing they can provide.</p> | <p>Paragraph 5.56 of the SPD states that an “open book financial assessment” will be used to ensure that the level of affordable housing provision on a site is determined fairly. Similar wording will be added to Paragraph 5.36 of the SPD which refers to discussion between the Council and developers. The Council is setting up a Sites Appraisal Group internally to decide on the appropriate affordable housing provision for each site. Action: Wording will be added at the end of Paragraph 5.36 as follows: “To promote an open discussion on the financial situation the Council will use an ‘open book’ approach.”</p> |
| <p>6. What guarantees can the Council make that commuted sums can be spent on housing?</p> | <p>Committed sums will be dealt with through Section 106 Agreements which are legally binding. Paragraph 5.54 states that other planning related requirements that might be dealt with through a s106 such as play provision will be considered as a “known costs” so that the site owner and developer will be expected to make suitable provision when negotiating a purchase price for the land.</p> |
| <p>7. The list of development constraints in paragraph 5.53 is quite extensive and probably applicable to many large sites in Manchester – will this provide a way out for many developers? Who will assess whether the targets should be lowered on these sites?</p> | <p>The Council agrees that the list of exceptions is extensive, but in order to achieve regeneration in certain areas of the City, the SPD has been drafted to create a balance between providing affordable housing and ensuring that investment is not lost to the City. The Sites Appraisal Group of internal officers will assess the appropriate level of provision on a site by site basis, using 20% affordable housing provision as the starting point from which negotiations with the developer or site owner takes place. The final decision will rest with the Planning Committee or the Head of Planning under his delegated powers to determine Planning</p> |

| | |
|--|---|
| | Applications. |
| 8. Other points: Not related to affordability - would like to see houses rather than flats in South Manchester. Policy does nothing to address individual area issues such as student issues. | These matters will be covered by the Core Strategy. |
| | |

| Richard Newton, British Waterways | |
|---|--|
| Summary 1. British Waterways seeks high quality, well-designed development along waterways that provide for natural surveillance, improvements to the public realm and enhanced views from and to the water to achieve an increase in corridor activity. | Response Agree. Paragraph 5.35 of the SPD states that all homes should comply with requirements set out within the Council's Guide to Development SPD in paragraphs 11.38-40. |
| 2. The SPD should retain recognition that it is not always possible to meet full affordable housing requirements in regeneration areas on complex previously developed sites. | Agreed: this point is covered in paragraphs 5.50-5.56. |
| 3. Have targets for affordable housing been based on an assessment of the likely economic viability of the land (including regeneration areas) for housing and the likely levels of finance available for affordable housing, as PPS 3 requires? | The amount of affordable housing to be provided will be determined on a site by site basis which is subject to an "open book" appraisal and will take into account exceptional circumstances – see paragraphs 5.50, 5.53 and 5.56. It is in conformity with Paragraph 29 of PPS3. The SPD has also been informed by a Housing Land Availability Assessment. |
| 4. The guidance needs to be flexible enough in relation to the preferred dwelling mix that it can adapt to evolving needs and demands | Agree. Action: A new paragraph will be added after paragraph 5.11 to state that "All thresholds and the preferred dwelling mix will be monitored and reviewed on a regular basis to ensure that the policy is being implemented effectively both in the delivery of affordable homes and with respect to its impacts upon regeneration objectives and other related policies." |
| 5. The recognition at paragraph 5.26 that 'the types and sizes of housing provision for each site will vary' is important and should be retained. | Agree. It will be. |

| Christopher Boyko | |
|---|---|
| Summary | Response |
| 1. Paragraph 2.1 - What about social and environmental "success" as well? | Agree. Action: Paragraph 2.1 will be amended so that it states: |

| | |
|--|--|
| | “As the City’s economic growth continues to accelerate, the City needs to diversify its housing offer through a new policy framework to support economic success, social and environmental improvements, and the outcomes of the Community Strategy. |
| 2. Para 2.6 – What is the ‘new economy’? | ‘New economy’, in the context of the Affordable Housing Strategy objectives, refers to the characteristics of the new growing economic sectors of the city which will provide the majority of future employment. |
| 3. Para 3.10 - This has the potential to sound like a socially exclusive enclave. Although the title, “Neighbourhoods of Choice” may give those living in these areas a psychological boost, it also may create tensions, particularly for those living adjacent to these areas who do not live in one of the “Neighbourhoods”. By not living in a “Neighbourhoods of Choice”, will they feel as though no one wants to live in their neighbourhood and that, as a result, their sense of responsibility for their area will diminish, thereby creating a downward and self-reinforcing spiral of neglect? Is there a possibility of giving the scheme another name? | The term ‘Neighbourhoods of Choice’ refers to all neighbourhoods in Manchester. The Community Strategy aspires to ensure that all neighbourhoods will be attractive places in the future where people will choose to live. The term does not refer to a specific designated area. |
| 4. How are the ‘newly arising need’ and ‘future supply’ figures in Table 4.1 arrived at? | The figure for newly arising need is contained in the 2007 Housing Needs Assessment paragraph 6.11. The information was derived from an interview and postal study. Housing supply is governed by housing market conditions and the available land supply which informed the Regional Spatial Strategy. A figure of 3,500 housing units is identified as net housing provision for Manchester per year within the RSS of which a proportion will be defined as affordable. |
| 5. Para 4.17 – This (the statement that 11% of households in rented accommodation who want to buy could afford £85) also assumes that renters wish to move into owner-occupation. And if policy continues to push owner-occupation, rather than a balance of owning and renting, then there will be less affordable housing available, which will drive up housing costs due to low supply. Should not there be more of an emphasis on creating an affordable rent-own balance, or is local government not equipped to deal with the management of social and affordable housing in rental form? | Currently home ownership levels in Manchester are significantly lower than the national average. There is an emphasis upon intermediate housing in the SPD to meet the aspirations of the City’s residents by providing alternative housing solutions which enable those who wish to buy, greater choice within Manchester. This reflects the agreed target of 60% home ownership by 2015 identified within the Community Strategy. |
| 6. Para 4.19 - If this is the case, then why isn’t local government increasing the amount of rented social and affordable housing in Greater Manchester? What is not being acknowledged here? | As stated in paragraph 5.9, and for the reasons given in the response above, the Council is placing a strong emphasis on encouraging assisted home ownership options. |

| | |
|---|--|
| <p>Para 5.4 - How will this be determined if the land is owned by different people, yet they are all working together to put in separate—yet connected—planning applications?</p> | <p>Each planning application is dealt with on its own merits and determined separately. In regeneration areas the Council assembles land under common ownership where necessary to pursue wider social or economic objectives. However, Its powers are limited under the Compulsory Purchase legislation as is its budget.</p> |
| <p>7. Para 5.7 - How is this so when Table 4.1 indicates that social rented, rather than intermediate, housing is what is needed now and in the future? What evidence is being shown to support this statement?</p> | <p>Table 4.1 identifies a net annual need of 716 (52%) social rented units and 659 shared ownership. As stated in paragraph 5.9 this figure will be monitored, but should also be considered in the context of the large amount of social rented housing and private rented property compared to the tiny amount of shared ownership within the housing profile as it currently stands. This policy is also targeted at those people wishing to remain within the City who cannot afford outright home ownership.</p> |
| <p>8. Para 5.10 target - Of all new housing provision, or housing provision above a certain size or amount of dwellings? How did you arrive at 20%? Why not 25%? 30%. And how did you arrive at the 5% and 15% figures in paragraph 5.11.</p> | <p>The 20% target refers to affordable housing as a percentage of all new housing across the City – therefore not 20% on every single site. However the SPD does not apply to sites falling below the thresholds set out in paragraph 5.4. The SPD proposes a 20% figure rather than the 30% figure suggested in the Housing Needs Assessment, as stated in Paragraph 5.8, to reflect the Council's interim approach to ensure the need for affordable housing is met while not prejudicing other economic and regeneration objectives by this new policy approach previously untested in Manchester. The split between social rented of 5%and 15% intermediate housing provision is an attempt to diversify housing choice and meet the Community Strategy's target of 60% home ownership by 2015.</p> <p>Action: 5.10 and 5.11 have been amended to clarify the city-wide target.</p> |
| <p>9. Para 5.13 - How does rental accommodation, both social/intermediate and private, contribute to the flight of young families and diversity of people from the City?</p> | <p>It is not rented housing specifically but rather the lack of appropriately priced housing for owner occupation that contributes to people leaving Manchester when they start a family. Additional intermediate housing will provide a missing step within the housing ladder for first time buyers.</p> |

| | |
|---|---|
| <p>10. Para 5.19 – The Manchester definition of “key workers” is too broad and, essentially, encompasses everyone who works, lives and recreates in Manchester. There should be continued discussion about what a key worker is (see Mike Raco’s (2007) ‘Building sustainable communities: Spatial policy and labour mobility in post-war Britain’. Bristol: The Policy Press) to ensure that key worker policy is well-defined</p> | <p>Further work will be done to define key workers before the SPD is finally adopted. The Council has used a definition of the term key workers which differs from the national definition in the draft SPD because workers in Manchester’s growth sectors, such as the financial industries, who are crucial to the growth of Manchester’s economy, are not covered by the national definition. The definition of key workers given in the SPD will be kept under review.</p> |
| <p>11. Para 5.22 - Isn’t this a bit of a self-fulfilling prophecy though: If developers mainly have data on one-bedroom flats—which are selling because there is not much else on the market—they can confidently say that these flats are selling. Thus, there is a need to build and sell more one-bedroom flats</p> | <p>Paragraph 5.22 recognises the need for larger accommodation. House size mix will be monitored to ensure an adequate balance of new affordable housing is brought forward.</p> |
| <p>12. Para 5.26 - While it is beneficial to know the housing needs of the immediate neighbourhood, isn’t it also important to know the housing needs of those who may be wishing to move into the various neighbourhoods? Capturing this information may be very useful, for example, in regeneration areas where new residents are attracted.</p> <p>Furthermore, how is need being assessed? Is there a survey given to residents in the area, asking about their needs? Is there any consultation done with residents, existing and future, about their neighbourhood and what they would like to see in the area?</p> | <p>The Housing Needs Assessment considered the reasons why people had moved and why they wanted to move. The survey included people who had moved to Manchester within the last five years. Work is ongoing within the wider housing market areas which will give more information on sub-regional patterns of movement. However detailed research to capture information on the needs of people who may wish to move into an area, whilst this would be useful, is expensive to acquire and difficult to frame.</p> <p>Need will be continually assessed through future updates of the Housing Needs Assessment as part of SHMA work. In addition, consultation is carried out with residents during the production of Strategic Regeneration Frameworks and other neighbourhood planning exercises.</p> |
| <p>13. Paragraph 5.35 (designs must comply with Guide to Development requirements) - What about the external spaces associated with the accommodation? How are these spaces being addressed to ensure equality of the space (e.g., there may be less people living in social housing who have vehicles compared with people living in private accommodation. Thus, the number of parking spaces could be lessened, but the number of bicycle spaces could be increased)? Can you assume that S.106 money is being used to help those in social and affordable housing, versus only those living in private accommodation?</p> | <p>Policies in the Guide to Development and the Unitary Development Plan will be used to make decisions on external design requirements. To provide different facilities for the affordable housing element of a development would be contrary to the ‘tenure blind’ approach proposed in the SPD.</p> <p>Section 106 monies will be used to provide for general community use rather than for specific groups.</p> |
| <p>14. Para 5.35 - Are those involved in the design of accommodation working across the council departments to ensure that the accommodations are part of sustainable communities? For example, is there information in the policy about crime and designing out crime?</p> | <p>As above, Saved policies within the UDP will be used to make decisions on these issues. During this process all appropriate agencies will be involved.</p> |

| | |
|--|---|
| Environmental quality (e.g., pollution monitoring, noise, recycling)? Traffic and sidewalks? Access? | |
| 15. Para 5.43 – Can you give an example of these conditions? (The conditions applied to planning applications to ensure affordable housing will be provided if sites are sub-divided). | <p>The thresholds identified within the SPD will be applied as conditions. These will vary according to circumstances on each site. The SPD will be applied in conjunction with the findings of the Housing Land Availability Assessment which has identified the capacity of sites prioritised for housing development. Sites included as part of the Council's 15 year land supply, even if brought forward in separate lots, would be expected to contribute to the Citywide affordability target.</p> <p>The Council is pursuing legal advice regarding clarifying the information in this paragraph.</p> |
| 16. Para 5.50 - If you do not allow affordable housing schemes in areas with low house prices, then you run the risk of gentrifying the area and pricing those people who are currently living in low-priced accommodation out of the market. | <p>Action: Paragraph 5.50 has been reworded to state:</p> <p>5.50 ...</p> <p>➤ There is either a high proportion of socially rented housing (60%) or low house prices in the immediate area compared to average incomes</p> <p>...</p> |
| 16. Para 5.50 - While the financial impact of an affordable housing scheme is undoubtedly important, you are neglecting the environmental and social impacts of the scheme on the immediate area and wider community. These impacts need to be taken more seriously if you are truly interested in creating sustainable communities. | <p>Housing proposals would form part of the consultations which take place with local residents when neighbourhood plans and other master plans are being developed. The impact of a scheme would be dealt with at planning application stage and inappropriate schemes would not be given permission. Action: Paragraph 2.1 has been amended to reflect this concern.</p> |
| 17. Para 5.54 - What about encouraging developers to continue contributing to the costs of these areas for a longer period of time, for example, 3 years upon completion of the development, and letting the residents know that a deal such as this has been arranged? This would give residents more confidence in developers (and possibly government) that they care about the sustainability of their communities. More efforts could then also be made to secure funding for these areas once the set period of developer contributions has elapsed. | <p>The timescale for contributions would be dealt with through a Section 106 Agreement.</p> |
| 18. Para 6.3 - When would the public—particularly those in the community where the new housing would be located—be consulted on the development? Is there any scope for earlier involvement of the public, even at the pre-application discussion phase? Could a member(s) be part of the affordable housing team, should one exist in the council? Could there be—if one does not already exist—an affordable housing group, external to the council, who provide input on affordable housing | <p>The public will be involved as part of the application process once an application has been submitted. However on large applications, the Council encourages developers to carry out pre-application discussion with local residents and other stakeholders. Details of this procedure are contained in Chapter 11 of the Statement of Community Involvement.</p> <p>The public would not be able to attend meetings of the internal</p> |

| | |
|---|--|
| schemes? | Sites Appraisal Group, as financial information about a specific development is often confidential. |
| 19. There is no Appendix E in this report (The affordable housing proforma). It would be good to see this Appendix, as it could inform what details are required by the developers. Once this form is completed, who gets to see it? Is there an affordable housing person(s) on staff? Who are they liaising with on the planning team (e.g., urban design, access, highways, environmental planning)? | This proforma will be considered as part of an ongoing review of the implementation and monitoring of the policy and might be included at a later date in the Adopted SPD. |
| 20. Para 6.14 - How many times is the survey (the evaluation of clients' satisfaction) conducted? When is it conducted (e.g., 1 month after the development is completed and then once more, about 6 months later)? Who sees the results? | The Council has just included the broad principle of carrying out a survey in the SPD. Details will be worked out later. |
| 21. Box under 5.32 – How would the Council respond to the issues of affordable units not being of the same design specifications as other units if brought up at a planning application meeting? | As set out in the SPD, affordable units should be integrated into the scheme so that it is tenure blind. The Council would discuss this issue as part of a pre-application discussion. |
| Paul Brickles, Redrow Homes NW | |
| Summary | Response |
| 1. The SPD is contrary to national policy. Proposals to set targets for affordable housing thresholds, size & type requirements and developer contributions should be in a DPD not a SPD as required by PPS 3 which states "In Local Development Plan Documents, Local Planning Authorities should...." | <p>The proposed SPD is a Local Development Document although not a Development Plan Document. This quote from paragraph 29 of PPS 3 refers to Local Development Documents in general, not a Development Plan Document specifically.</p> <p>The Council's Core Strategy will not be adopted until 2010. Delaying the implementation of an affordable housing policy would be acting contrary to national policy given the identified existing need for more affordable housing. PPS 3 states in paragraph 68 that "When making planning decisions for housing developments after 1st April 2007, Local Planning Authorities should have regard to the policies in this statement as material considerations which may supersede the policies in existing Development Plans".</p> <p>Action: The presentation of the document will be amended to ensure that UDP policies are clearly referenced to proposed SPD policy.</p> |
| 2. PPS 3 seeks an 'Evidence – Based Policy Approach' for determining housing need. This is also endorsed by DCLG guidance on Strategic Housing Market Assessments and housing need surveys cannot be used as a proxy. Anyway, there's no explanation for adopting a 30% target. | <p>The Housing Needs Assessment was carried out in advance of recent guidance and will inform the sub-regional SHMAs currently being worked up across local authorities.</p> <p>The Housing Needs Assessment suggested a target of 30%. However, given other regeneration priorities and not wishing to prejudice inward investment and threaten economic growth, the Council has applied the precautionary principle by adopting a lower</p> |

| | |
|--|--|
| | affordable housing target of 20% which will provide more affordable housing units whilst not deterring investment as part of a more flexible approach. |
| 3. In summary, the draft SPD seeks to by-pass the proper planning process and introduce significant new policy requirements which would not survive independent scrutiny. Redrow consider the draft SPD should be abandoned and the Council should concentrate its efforts on bringing forward its Core Strategy DPD, which is the proper place to consider such matters. | The Council's Core Strategy will not be adopted until 2010. If we waited until then to implement an affordable housing policy we would be contrary to national policy – PPS 3 states in paragraph 68 that “When making planning decisions for housing developments after 1 st April 2007, Local Planning Authorities should have regard to the policies in this statement as material considerations which may supersede the policies in existing Development Plans”. Although the SPD & Planning Guidance will not have as much weight as policies in the Core Strategy, it sets out the direction the Council will be taking in its approach to widening housing choice and it is hoped that developers will work with the Council to deliver this. |
| Mel Dwyer, New City Vision | |
| Summary | Response |
| 1. You propose an affordable housing requirement of 20%, 5% of which is to be for affordable housing for rent. On smaller sites, whereby the number of units for rent could end up as being as low as 1 dwelling, it is unlikely that RSLs will be interested taking the unit(s). It will not be cost effective for them to do so from a management point of view, unless they have other units in the immediate vicinity. Is there the flexibility to alter the mix of intermediate and rent depending on overall number of affordable units? | Where it is not feasible to provide affordable housing on-site – such as in the example of providing only 1 socially rented unit, paragraph 5.45 of the SPD allows for off-site provision or a commuted sum to be considered. |
| 2. Based on your proposals regarding additionality. In the main, it will be assumed that no NAHP funding will be available for affordable housing. Based upon my knowledge (as a recent employee of a large RSL) a RSL will only be in a position to pay approximately 46-47k for a 2bed unit for rent and 52-54k for a 3-bed unit for rent. Depending upon the number of units for rent, this could have a real detrimental affect on land value generated. | The Exceptions policy in paragraph 5.50 states that affordable housing would not be required where it would make the scheme economically unviable. This will be tested using an ‘open book’ financial appraisal. |
| 3. In some local authority areas the affordable housing requirement is calculated on the number of bed spaces, not units. Has consideration been given to this? | By using bed spaces rather than units there is a risk that rooms which would not normally be bedrooms are counted. The policy will be applied flexibly where larger properties are involved. See paragraph 5.29 of the SPD. |
| 4. Finally, I read with interest, the proposed competition for developers. I would be grateful for any further details that you may have regarding this. | The Council will publicise any competition in due course. |

| | |
|--|--|
| | |
| Steve Broomhead, NWDA | |
| <p>Summary</p> <p>1. While supportive of the approach set out in the SPD, the NWDA is concerned that the definition of key workers as “those who are essential to the economy of Manchester” could be interpreted widely and therefore could benefit from further clarification in the formal consultation draft of the SPD.</p> | <p>Response</p> <p>The Council has used a broader definition of key workers than the national definition because it is workers in the growth sectors, such as the financial industry, who are crucial to the growth of Manchester’s economy that are not covered by the national definition. The definition of key workers given in the SPD will be kept under review.</p> |
| David Miller, Dandara | |
| <p>Summary</p> <p>1. Dandara challenge the legitimacy of using policies H1.2 and H1.5 to underpin the policy basis for the SPD stating that “It is a prerequisite that any SPD, regardless of topic area, must be supplementary to a development plan policy and not new policy...” It follows that the Local Planning Authority cannot insist upon Affordable Housing.</p> | <p>Response.</p> <p>The intentions of UDP policies H1.2 and H1.5 are to help to deliver a wider mix of housing – one element of which is affordable housing, as mentioned in the Reasoned Justification to Policy H1.2</p> <p>PPS 3 states in paragraph 68 that “When making planning decisions for housing developments after 1st April 2007, Local Planning Authorities should have regard to the policies in this statement as material considerations which may supersede the policies in existing Development Plans”. Although the SPD & Planning Guidance will not have as much weight as policies in the Core Strategy it sets out the direction the Council will be taking in its approach to widening housing choice and it is hoped that developers will work with the Council to deliver the SPD prior to policies being included within the Core Strategy of the LDF.</p> |
| <p>2. The Council needs to be pragmatic in its insistence upon enforcing related housing policies including:</p> <ul style="list-style-type: none"> • DFA2 • Sustainability criteria • Development mix (i.e. the city centre “Manchester mix”) • Public realm • Design styles • Density • Car parking <p>3. The Council needs to be receptive to other: “sustainable and realistic lending calculations based upon the 25k household income”</p> <p>4. Account should be taken of the fact that no provision has often been made within sites now owned and controlled by developer</p> | <p>2. Manchester City Council wishes to encourage development of the highest quality. National planning policies require local planning authorities to deliver affordable housing where need exists. This will not be at the expense of other related housing policies, such as high quality design, disabled access or environmental requirements within the existing planning policy framework. These requirements will be a necessary part of any application. Exceptions as described in paragraphs 5.50 or exceptional costs will be considered if it can be demonstrated that they might prejudice development.</p> <p>3. Action: Amendment to paragraph 2.8 responding to point 3 of the submission: “The Council wishes to see an innovative approach to resolving affordability as an issue within the housing market. As such, it is asking the development industry to develop financial packages which meet identified need within the income/house price</p> |

| | |
|---|---|
| <p>been made within sites, now owned and controlled by developer, consequently no provision for affordable housing has therefore been made.</p> <p>5. Site threshold of 0.3 might prejudice small sites built out at 50dph.</p> <p>6. "The Council is encouraged to consider options above and beyond the sale of property via RSLs involving shared ownership/equity solutions. "</p> <p>7. The continued adherence to the "Manchester mix" could prejudice achieving the Council's target of 60% home ownership since "Providing affordable homes and developer returns, ... are inextricably linked therefore flexibility of unit mix is an absolute necessity..."</p> | <p>ratios identified at paragraph 4.21."</p> <p>4. Action: The exceptions policy in Paragraph 5.50 has been amended to state that where "A legally binding agreement had been reached on land values by 1st December 2007 which had not incorporated the cost of affordable housing" a lower proportion of affordable housing will be required.</p> <p>5. Wording has been added into paragraph 5.4 to state that "If affordable housing is inappropriate on a site which is larger than 0.3 Ha because there are less than 15 units, payment of a commuted sum by a developer will be acceptable instead".</p> <p>6. See response to point 3.</p> <p>7. The preferred dwelling mix set out in Table 3 is based on evidence from the Housing Needs Assessment, which indicates the size of housing required. The dwelling mix also supports the Council's aim to encourage more families to move or remain in Manchester.</p> |
| David Hardman, United Utilities | |
| Summary | Response. |
| 1. United Utilities endorse the enforcement of high design standards including water saving devices. | Paragraph 5.35 of the SPD states that all homes should comply with the requirements in the Guide to Development. Section 4.9 in the Guide to Development on water saving applies to all new development. |
| Sarah Foster, Turley Associates on behalf of Space Developments Ltd, Lowbridge Ltd and Braidwater Ltd. | |
| Summary | Response. |
| 1. (2.4) Other related documents of the Affordable Housing Strategy should be made available to enable full consideration of the issues in the SPD. | The Council will publish the Affordable Housing Strategy at the same time as the formal consultation stage of the SPD. |
| 2. (2.9) The SPD should only be afforded limited weight until it is formally adopted. | This is the case. While policies in the SPD have less weight than those contained within a DPD, they set out the approach to providing affordable housing that developers will be encouraged to follow. |
| 3. The term "City Wide target" should be clearly defined. | <p>Agree. The City Council will seek to ensure that, in total, 20% of all new housing should be affordable when assessed on a 'City Wide' basis and the Council will expect developers to use the 20% target as a starting point for calculating affordable housing provision.</p> <p>Action: Section 5.10 has been amended to clarify this point.</p> |
| 4. (5.11) The 5% Social rented figure is unnecessarily prescriptive and should apply Citywide and not site by site according to need. | The 5% figure is a percentage of all new housing stock in the City, therefore the Council will not expect 5% of every development to comprise social rented provision – the appropriate mix will be determined based upon locally determined need and in particular, the amount of social housing provision already in the area. However, if the amount of social housing provision is reduced, the amount of intermediate housing is likely to be increased on a specific site. |

| | |
|--|---|
| | Action: amendments to Paragraphs 5.50 and 5.11 have been made to clarify this point. |
| 5. (5.29/5.30) The release of and need for 1 bed affordable accommodation should be more clearly acknowledged in the SPD. | The Council is trying to change the balance of Manchester's housing stock to attract and retain more families, therefore the SPD lays emphasis upon the need for larger houses to accommodate growing households |
| 6. (5.32) Restrictions upon grouping together of social housing units is opposed. It is suggested the Council seek this as: "aspirations and targets' rather than specific requirements"... | The SPD requires affordable housing to be integrated into a development so that it is 'tenure blind'. Social housing is more likely to be of the same high design standard if it is integrated into the development. |
| 7. (5.44) A formula for commuted sums is requested. | Action: An additional paragraph at 5.49 of "Providing For Housing Choice" (Formal Consultation Stage Draft) has been added which includes a formula for calculating a commuted sum. Appendix C gives more details upon this point. |
| 8A. (5.50) In some cases affordable housing might not be appropriate and asked for during negotiations. Turley's suggest an amendment to the first sentence of 5.50 to reflect this. 8B. Turley also suggest a further exception as follows: • the applicant entered into a legally binding contract to purchase the site (either subject to planning permission or unconditionally) prior to the adoption of the SPD and can provide documentary evidence to substantiate such claims. | Disagree: this is already covered by paragraph 5.50 which states that a lower proportion of affordable housing may be permitted where the financial impact of providing affordable housing along with other planning obligations would affect the viability of the scheme. An 'open book' approach will be taken to assessing this. |
| Michele Brown, Drivers Jonas on behalf of Ask Property Developments | |
| Summary | Response. |
| 1. ASK supports the objective of providing affordable housing where "this can be achieved without undermining the viability and therefore deliverability of major, complex regeneration projects. This is particularly relevant to well advanced schemes. 1.B. ASK suggest an amendment to 5.50 as follows: "The scheme was conceived, and a concept designed, and well advanced in either Development Framework/Master plan terms or in discussion with senior officers of the Council, before the adoption of this guidance. This would include commitments to acquire land having already been entered into, and the preparation of Development Frameworks/Master plans to facilitate applications for planning permission, including detailed pre-application discussions, already underway." They point out that because of long term negotiations and financial | Support for the policy is noted. The final point in paragraph 5.50 stated in the informal consultation draft that, if a scheme was substantially developed before the adoption of the guidance, i.e. before a cut-off date, then it would be excepted from the policy. The proposed amendment would exclude new housing schemes for a long time into the future and limit the effectiveness of the SPD. Action: Paragraph 5.50 has been amended to state that if "A legally binding agreement had been reached on land values by 1st December 2007 which had not incorporated the cost of affordable housing" then a lower proportion of affordable housing will be required. |

| | |
|---|---|
| planning, certain developments could be jeopardised if provisions for affordable housing were now brought forward. | |
| Carol Clark, How Planning (Needs Analysis attached as appendix) | |
| Summary | Response. |
| <p>How Planning consider that the Housing Needs Survey is flawed and therefore does not constitute a robust evidence base (1.4). A submitted report considered the methodological approach, its findings and inform the provision of affordable housing. 1.3 suggests income and private sector rent have increased in equal proportions not increasing demand for affordable housing. Lower Manchester house prices in regional and national terms also reduce need.</p> <p>Conclusions (6.1):</p> <p>The HNA07 was commenced prior to the publication of the SHMAPG1 or the SHMAPG2 and the majority of the assessment would have therefore been subject to the guidance contained within the GGP published in 2000.</p> <p>The HNA07 seeks to define sub- areas within Manchester that are not necessarily representative of true housing market sub- areas, and which are based upon measures that are not in line with national guidance.</p> <p>The quality of the survey data upon which the HNA07 largely relies to assess levels and types of affordable housing need is questionable. With a return rate of 11% it does not comply with SHMAPG2 requirement of 30% as the absolute minimum in respect of the number of returns achieved.</p> <p>The HNA07 provides no guidance in relation to the calculation of its figures, which is not in accordance with SHMAPG.</p> <p>The interpretation of the survey data by the HNA07 has resulted in an inflation in the level of current and emerging affordable housing need, and the conclusions drawn by the author of the HNA07 in relation to the 30% proportion of affordable housing that is required in the Manchester housing market area are therefore unsound.</p> <p>The assessment in the HNA07 of the sizes of affordable housing required is based on households expectations.</p> | <p>How Planning's criticism of the needs survey has been produced to demonstrate that there is little need for an SPD to tackle the question of affordability and any further restrictions upon the provision of smaller apartments. Their criticism covers the use and implementation of CLG Guidance, survey methodology and interpretation of the findings.</p> <p>Fordhams did attempt to amend the survey to respond to changing legislation, but the timing of the survey has resulted in some ambiguity relating to Government Guidance. However, Fordham's interpreted recent changes where they could to ensure that the survey would meet the latest CLG guidance.</p> <p>The criticism of the survey method, particularly the response rate and sample size, does not correspond to our experience of generating survey responses. The response rate is a practical reflection of the difficulty of obtaining information in deprived areas. The 200 minimum sample obtained in each neighbourhood area conforms to DCLG Guidance. The cost of generating a bigger sample would have been unjustifiable.</p> <p>The sample survey is likely to have led to an underestimation of need if anything because those groups most commonly in need are less likely to respond. In any event we took a lower needs figure to set affordability targets (20%). How's report also underestimates the intended role the document has in trying to diversify housing mix and cater either for families within the City by persuading them not to leave or by providing an attractive housing alternative for families considering moving to the City.</p> |
| Simon Artiss, Bellway | |
| The assessment of local needs which the SPD should be based on must | An internal group of MCC officers will determine the appropriate |

| | |
|--|---|
| reflect the different local circumstances in the city for it to be robust. | balance of provision on a site by site basis according to the local circumstances. Paragraph 5.26 gives examples of the types of local circumstances that would be taken into account. |
| SPD must support wider regeneration objectives and not act as a barrier to their delivery. There are a range of issues to be faced on sites in regeneration areas, such as development costs and potential delays in development and these need to be considered in the SPD. | Paragraph 5.50 sets out circumstances where lower provision will be permitted and this includes where “the inclusion of affordable housing would prejudice the achievement of... regeneration objectives”. |
| A range of solutions to delivering affordable housing should be advocated in the SPD such as open market housing which is affordable by size and discounted market value homes. | Paragraph 2.4 states that innovative financial packages and products to deliver affordable housing will be outlined in the affordable housing strategy. The Council will not accept designs which compromise quality, housing standards or regeneration objectives. |
| The data that the SPD is based on will need to be revised if the housing market declines in the future. | The Housing Needs Assessment will be reviewed every three years to ensure that the needs data is up to date. |
| The SPD must acknowledge that land values are very high in some parts of the City which will have an impact on delivering new homes including affordable homes. | The Council will use an ‘open book’ approach to determining whether it is financially unviable for a developer to provide affordable housing. |
| Developers have considerable understanding of the local housing market and wish to avoid building units that there will be no demand for. | The SPD is aiming to widen housing choice and it is hoped that developers will use their understanding of the housing market to work with the Council to deliver this objective. |
| The SPD should support off-site affordable housing provision where it isn’t necessary or desirable to provide affordable housing on-site. | Normally the Council wants to avoid monolithic provision of a certain type of housing therefore would want a mix on each site, including affordable housing. However paragraphs 5.44-5.46 set out policy for using commuted sums. |
| Bellway seeks a negotiation between parties to secure appropriate delivery of affordable units as the level of affordable provision will vary on different sites across the city. | Agreed. The Council wishes to work in partnership with developers to determine the affordable housing provision on each site. |
| Bellway wishes to avoid too heavy a burden of affordable housing whereby it would make development unviable. | The Council will use an ‘open book’ approach to determining whether it is financially unviable for a developer to provide affordable housing. The 20% affordable housing provision figure is a conservative estimate of the level of need in the City. |
| Consideration must be given to the availability of affordable accommodation across the City Region when developing affordable housing policy. | Further work is being carried out as part of the Strategic Housing Market Assessment which will look at affordability across the city-region. |
| An important consideration in affordability is income levels which compare poorly with the national average – the SPD should support initiatives to raise income levels. | This goes beyond the scope of the SPD. |
| Bellway does not support the 0.3Ha threshold (based on the 50 units per hectare density) as densities will vary across the City – point to other | This threshold has been set to reflect the higher housing densities in Manchester due in part to the number of apartments being built. |

| | |
|--|---|
| councils using a 0.5 Ha threshold. | |
| The 20% figure should reflect local needs and not be fixed for all sites across Manchester. | The 20% figure applies to 20% of all new housing in the City, but will be used as a starting point for negotiating the level of affordable housing to be provided on a site. As stated in paragraph 5.26 the types and size of affordable housing on each site will vary according to local housing need. |
| The location of affordable units in a development should be considered on a site-by-site basis as part of layout considerations. | Site layouts should follow the policy approach set out in paragraph 5.32 to ensure that developments are 'tenure blind'. |