

APPENDIX 1

Providing for Housing Choice - Supplementary Planning Document & Planning Guidance

Comments received during formal consultation 9th January – 20th February 2008.

All page and paragraph references in this schedule refer to the consultation draft of Providing for Housing Choice.

Contact Full Name	Contact Organisation Details	Consultee Comments	Number	Title	Council's Response
Flick Harris	Chair Manchester Disabled People's Access Group	Change the sentence to read, "everyone living in Manchester has the opportunity of a decent, affordable and accessible home.....! Families require accessible homes as do disabled workers or people in employment with disabled members of families or friends.	1.3	Paragraph	Agree. "and accessible home" will be added to the first sentence of paragraph 1.3.
Flick Harris	Chair Manchester Disabled People's Access Group	The City Council should ensure that there is a strategy for affordable accessible housing throughout the city not only for residents who are currently very poorly provided but also for disabled people who wish to come to Manchester for employment. A strategy for accessible housing will ensure more flexible accommodation for all families and it will also support the NHS strategy which is promoting the care of people in their homes. The strategy will also support the development of individualised budgets and will ensure that there is sufficient affordable choice in all housing sectors.	1.2	Paragraph	Rather than develop a separate, stand-alone strategy the issues of accessibility are to be dealt with through mainstream strategic housing work.

Flick Harris	Chair Manchester Disabled People's Access Group	Add to second sentence, "New development, with a high proportion of good quality and accessible private housing.....continues to be a priority! Currently most private developments are not capable of adaptation for disabled people and this limits not only the housing provision available but also the flexibility available to single people and families who purchase these properties and whose circumstances change.	1.4	Paragraph	Agree. Wording will be added to paragraph 1.4 to highlight that affordable housing provision is to meet the need of all people. The second sentence has been amended to read: "New development, with a high proportion of good quality, private housing, especially for owner occupation, and which meets the needs of the whole community, continues to be a priority."
Flick Harris	Chair Manchester Disabled People's Access Group	<p>Add to first sentence, " inclusion", to read....</p> <p>"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, inclusion, social and environmental improvements and the outcomes of the Community Strategy.</p> <p>Add to 2nd sentence, "including disabled residents" to read:</p> <p>"The Council needs to ensure better opportunities are available for lower paid and lower skilled including disabled residents to access housing and share in the predicted growth. Achieving this requires a new, more sophisticated strategic approach to the City's housing strategy."</p> <p>Add to 3rd sentence: accessibility" to read:</p> <p>"The Council needs to lead on improving the quality, quantity, accessibility and balance of</p>	2.1	Paragraph	<p>"inclusion" will be added to the first sentence of 2.1.</p> <p>The Supplementary Planning Document & Planning Guidance does not list all of the groups who are disadvantaged in terms of accessing housing in the second sentence - it only refers to lower paid and lower skilled residents because the focus of the document is on affordable housing.</p> <p>Accessibility of housing is dealt with through the Council's Design for Access 2 manual.</p>

		housing supply in the City."			
Flick Harris	Chair Manchester Disabled People's Access Group	<p>Adding more accessible properties will assist disabled people in choosing to live and work independently and there often needs to be a wide choice of accommodation to reflect different lifestyles, which might include living with friends as well as family or living on your own. The choice of accessible accommodation in a particular area, it may be necessary to use accessible transport or be near to employment opportunities and other facilities. It will support the strategy of the government in encouraging disabled people into long term employment.</p> <p>"Whilst improved access to housing is an immediate element of creating neighbourhoods of choice, it also plays a significant role in the drive to raise self esteem, independence and in further rewarding greater economic activity."</p>	2.2	Paragraph	Agree. "independence" will be added to the last sentence of paragraph 2.2.
Flick Harris	Chair Manchester Disabled People's Access Group	I hope that the proposed competition "constructed to the highest design standard" will include the specifications, which are the policy of the City Council in Design for Access 2. Innovative designs that incorporate accessibility should have included consultation with access groups and consultants, considering barriers across all impairments.	2.4	Paragraph	The Paragraph dealing with Design policy (after 5.23) states that homes should comply with the requirements in the Guide to Development SPD and Planning Guidance - wording will be added, to emphasise access as an important issue, to state "...and take account of the relevant provisions of Design for Access 2".
Flick Harris	Chair Manchester Disabled People's	Currently there is insufficient information about accessible housing in each ward in Manchester covering all social and private housing stock. It is a requirement under the Disability Discrimination	3.2	Paragraph	At present the Council has a great deal of information about the properties where the Council has been involved in providing adaptations and a good understanding of the

	Access Group	Act, particularly in the Disability Equality Duty, to collect relevant information on disabled people's issues. This is one key area that the City Council could implement by identifying accessible accommodation throughout Manchester and its level of adaptability, cost and covering social and private housing. This is not just about the allocation of housing, but about the availability and choice of housing. Where it is identified that there are no accessible properties or properties available for adaptation, this could lead to more targeted planning policies and negotiations with developers to ensure that new and refurbished properties are designed to be more accessible. The policy should ensure that information is collected to identify gaps in provision or barriers in management and allocation policies, some of which limit accessible housing to older residents. It will also lead to a more strategic approach to refurbishment and allocation of social housing.			house types within the social housing sector that are capable of adaptation. The Council will be exploring the possibilities of collating our knowledge about adapted/adaptable/accessible properties in Manchester, but this is not the remit of the Supplementary Planning Document and Planning Guidance or the Access to Affordable Housing Strategy, and there are resource implications in doing this particularly for the variety of house types within the private sector.
Flick Harris	Chair Manchester Disabled People's Access Group	In relation to the government targets, it is recommended that targets and thresholds should include the provision of accessible housing and involve the developers who may find that the properties are more marketable where accessible design features are incorporated.	3.3	Paragraph	Providing for Housing Choice sets out the government guidance relevant to affordable housing. Policies relating to accessible housing provision would be considered at a later stage during Core Strategy preparation. Chapter 3 of the Guide to Development in Manchester Supplementary Planning Document & Planning Guidance highlights design principles that will help to achieve accessible development.
Flick Harris	Chair	The Sustainable Community Strategy underpins	3.9	Paragraph	Noted. The Access to Affordable Housing

	Manchester Disabled People's Access Group	the need for the use of innovative and accessible design and planning policies to deliver housing that will support the independence and requirements of disabled people of all ages and living in diverse communities and arrangements.			Strategy will support the delivery of the vision in the Sustainable Community Strategy.
Flick Harris	Chair Manchester Disabled People's Access Group	Rented accommodation, including those used by students, are rarely accessible for many disabled people and there is a shortage of accessible rented accommodation in the City Centre, despite the opportunities for employment and leisure activities and the ease of accessing public transport. This is an area for new policies and encouragement of innovative accessible design. Collecting evidence of availability should identify priority areas to encourage new designs, refurbishments and the greater availability of accessible housing.	3.12	Paragraph	Noted.
Flick Harris	Chair Manchester Disabled People's Access Group	I have been told by members of the City Council that homes are being built in Manchester, using Design for Access 2 standards as part of the Housing Market Renewal Partnership. These standards are much better than the national "Lifetimes Homes" standards so that if this is true, then Manchester should be celebrating the use of best practice standards, particularly if, as I have been told, residents are very pleased with the designs. If these standards are only being applied to a small area of Housing Market Renewal, then at least there should be some review of the success or otherwise of these standards and note that this has contributed to the availability of	3.15	Paragraph	The Council aims to keep design in Manchester at a high standard. Development Control officers discuss with developers examples of good practice during pre-application discussions. Developments on Council-owned land adhere to the design standards in Design for Access 2.

		accessible housing for residents. I would hope that the City Council and the developers would promote these standards nationally and to the DCLG.			
Flick Harris	Chair Manchester Disabled People's Access Group	Design for Access 2, which was adopted by MCC as policy and is part of SPG, includes standards for housing and I hope that the LDF will acknowledge and encourage the use of these standards within the LDF policies. Until this has been formally adopted, I would expect that MCC will continue to use the standards for their own projects and joint developments and encourage developers to implement the standards in their proposals.	3.17	Paragraph	The Council will continue to operate to high standards. New policies within the Core Strategy will continue to build on this success.
Flick Harris	Chair Manchester Disabled People's Access Group	I would be interested to know whether the survey included the requirements of disabled people, including adults who may not identify as disabled people but who may experience physical or sensory barriers. Many disabled people are unable to find suitable accommodation in the rented sector and there is very little information nor are there any access audits carried out of existing properties. When adaptations have to be made, many disabled people cannot afford them, cannot get grants or support early enough from MCC or are discouraged from getting adaptations by landlords. These and other issues are not recognised in the more general issues identified in the summary or in prioritising the provision of additional accommodation.	4.13	Paragraph	Providing For Housing Choice reflects the aims of the Guide For Development and where applicable Design for Access 2. The data from the Needs Survey will be used to help to inform the Council's future housing Strategy. The Housing Needs Survey covered many aspects of the personal details and requirements of the householder and people comprising part of the household and obtained details of related social and economic characteristics of all individual members including age, sex, employment status, commuting patterns etc. It included asking whether anyone in a household was disabled. It also identified the type and tenure of the property being occupied, including details of any sheltered housing: warden supported

					<p>accommodation or extra care provisions. It enquired as well about the housing history of the household. This included an assessment of any existing difficulties caused by the layout of the house and its facilities. Households were asked what improvements might be necessary (lifts, toilets, parking etc) to improve accessibility. People were also asked, whether, if their property had been adapted, they would have moved. Besides this, those who had moved were asked the reasons for moving, including the necessity of meeting any additional support needs, unmet access requirements or to administer to the care needs of others.</p> <p>Postal questionnaires were sent to thousands of people across the City on a random basis as well as over 1,000 personal interviews being carried out.</p>
Flick Harris	Chair Manchester Disabled People's Access Group	<p>There is no identification of thresholds for accessible housing either in relation to 100% or a smaller percentage. Currently nearly all if not all of the developments in the City Centre are not accessible as are all the recent private developments in the South of the City. it is important to include thresholds for all developments in the same way that there are thresholds for the amount of parking spaces even where there are fewer than 15. This should include at a minimum, a range of different thresholds including as a minimum visitor access for all</p>		Thresholds	<p>It would go beyond the scope of this SPD to identify targets for accessible housing but access issues will be covered in development control discussions where appropriate.</p>

		housing developments and better standards for most if not all new developments.			
Flick Harris	Chair Manchester Disabled People's Access Group	It would be helpful if disabled people's organisations were consulted regularly on these thresholds and targets.	5.7	paragraph	The targets and thresholds relate to the provision of affordable housing. When more evidence has been collected this will inform the development of further policy guidance.
Flick Harris	Chair Manchester Disabled People's Access Group	It is also important that affordability is not affected by adaptation charges or long waiting lists for grant aided adaptations and support. A review of provision and funding should be undertaken to ensure that provision of facilities are streamlined and easy to access, particularly for key workers	5.13	Paragraph	This is not within the remit of the Supplementary Planning Document & Planning Guidance and the Access to Affordable Housing Strategy. The rules about adaptation charges will not be affected by the strategy. The impact upon "essential workers" will be monitored by the Council. The Council also supports a wider range of policies to improve the income levels of all groups, including disabled people, to attempt to reduce disparities between household incomes within Manchester.
Flick Harris	Chair Manchester Disabled People's Access Group	All site briefs should include provision for accessible housing, including designs easily capable of adaptation in the future, sufficient space and consideration of the needs of people with physical and sensory impairments, along the lines of Design for Access 2		Location of the affordable homes	This would be the case for all site briefs, which are for Council owned land.
Flick Harris	Chair Manchester Disabled People's	Designs should comply, wherever possible, with Design for Access 2 specifications and developers should be required to consult with disabled people's organisations in line with the		Design	These matters would be covered when the developer is negotiating with the Council. The Design policy paragraph (after 5.23)

	Access Group	requirements of Design and Access Statements at Planning stage.			states that homes should comply with the requirements in the Guide to Development SPD and Planning Guidance - wording will be added to the end of this to state "...and take account of the relevant provisions of Design for Access 2".
Flick Harris	Chair Manchester Disabled People's Access Group	Exceptions allowed in relation to affordable accessible housing should be based on sound evidence of alternative housing options in the area, not currently available.	5.30	Paragraph	The Council's design standards will apply to all new housing developments. The exceptions in paragraph 5.30 are exceptions to providing affordable housing, not to providing accessible housing.
Flick Harris	Chair Manchester Disabled People's Access Group	It would be preferable if early consultations were held with disabled people's organisations, including access groups and access consultants before plans are fully developed	6.3	Paragraph	The Council would involve such groups in the principles of design through planning policy.
Flick Harris	Chair Manchester Disabled People's Access Group	Welcome this approach and hope that the provision and evaluation of affordable accessible housing is made part of the monitoring process.	6.8	Paragraph	The Council welcomes this support. The Council will be monitoring the impact of this policy. This will include both the number of new affordable houses and flats resulting from new development and the impact of new equity products that it is hoped will enable people to access the existing housing stock more easily. The Council will monitor the take-up by disadvantaged groups as part of this process.
Flick Harris	Chair Manchester	The procedure doesn't include the legislative requirement to complete Design and Access	Picture	Planning application	The chart just sets out the procedure to be followed regarding the negotiation of

	Disabled People's Access Group	Statements, Circular 01/06. This would ensure proper consultation with disabled people, a review of the policies and specifications utilised, a review of any access barriers and how they have been resolved etc.	6.1	procedure	affordable housing provision through a planning application. It does not cover all elements of a planning application that would be discussed. Design and Access Statements would be covered in the planning application process.
Mr Terry Fuller	Director of Partnering Taylor Wimpey	<p>It is essential that every SPD sets out at the start of the document that it is restrained by PPS12 Para 4.40. This states that the SPD must abide by Government policy statements and guidance (e.g. PPS1, PPS3, Circular 5/05 etc) it must abide by the adopted/saved plan in that it cannot change or make new policy, that it must be widely consulted upon and that such consultation should be taken into account in redrafting the document.</p> <p>This SPD fails this requirement and we respectfully ask that it is clearly stated at the start of the document.</p>		Document	<p>Providing for Housing Choice will be introduced in March. Its initial status will be as Planning Guidance.</p> <p>The Government has proposed changes to Planning Policy Statement 12 (PPS12) 'Local Development Frameworks', and amendments to the Planning and Compulsory Purchase Act 2004. These changes are likely to come into force in the late spring 2008. The proposed changes will allow Supplementary Planning Documents to be adopted as SPD where they correspond to policy in Regional Spatial Strategies and/or National Policy. When these changes are made, Providing for Housing Choice will be adopted as SPD. It corresponds to the provisions of PPS3 and policy L5 of the Draft Regional Strategy which states:</p> <p>"Plans and strategies should set out requirements for affordable housing, and the location, size and types of development to which these requirements apply. They should set quotas and thresholds for affordable housing provision along with an indication of the type, size and tenure of affordable housing required, which should be supported by evidence from sub regional housing market</p>

				<p>assessments.”</p> <p>The provision of affordable housing is also a key priority within the North West Regional Housing Strategy (2005), which seeks to provide affordable homes to maintain balanced communities. The Regional Housing Strategy states that:</p> <p>-Local Authorities will need to make full use of the planning system, including the use of Section 106 agreements to require the provision of affordable housing in new developments to meet local needs. They should continue to consider the need for affordable housing when preparing development plans (or local development documents under the new guidance) and adopt policies to make sure that this will be delivered.”</p> <p>The HNA is a robust document supporting the development of affordable housing targets in Manchester. This will be further developed as an evidence base once the SHMA is published in the summer of 2008.</p> <p>Providing For Housing Choice also delivers Saved Policy H1.2 of Manchester's Unitary Development Plan that states that the Council wishes to ensure that the housing stock contains a wide enough range of housing types to meet the needs of people who want to live in Manchester.</p> <p>In addition. PPS 3 states in paragraph 68 that</p>
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Mr Terry Fuller	Director of Partnering Taylor Wimpey	Only the adopted plan has the legal status when making planning decisions and that while a SPD is a material consideration it is of little or no weight where it fails PPS12. This should be stated at the start of the SPD. Please amend accordingly.		<p>Document</p> <p>The SPD & Planning Guidance conforms to PPS3 and Policy H1.2 of Manchester's Unitary Development Plan that states that the Council wishes to ensure that the housing stock contains a wide enough range of housing types to meet the needs of people who want to live in Manchester. Therefore Providing for Housing Choice is not introducing new policy as such; rather it is aiming to deliver existing policy.</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". Paragraph 1.1 of Providing for Housing Choice states that the document has been prepared to meet the requirements of the City's planning policies and government guidance. The SPD & Planning Guidance has been widely consulted on in accordance with the principles set out in the Council's Statement of Community Involvement.</p>
Mr Terry Fuller	Director of Partnering Taylor Wimpey	<p>There appears to be no definition of affordable housing in the SPD – we recommend that you use verbatim the definition in PPS3. Please add this to the document. While PPS3 acknowledges social rent and intermediate, it does not preclude low cost market housing from meeting a need. Indeed the adopted plan includes low cost market housing, and in order to alter this the Council should alter the plan through the legitimate planning processes not the SPD.</p>		Document	<p>Paragraphs 4.2-4.8 of the document summarise the PPS 3 definition of affordable housing. The Council's approach to providing affordable housing set out in this Supplementary Planning Document and Planning Guidance is wider than the PPS 3 definition. In addition to providing affordable units on-site, the Council's approach will be to work with the development industry to develop financial packages which will enable existing and future residents to access home ownership. This approach is set out in Chapter</p>

					<p>2.</p> <p>The SPD and Planning Guidance doesn't preclude low cost market housing which meets the PPS3 definition from contributing to the provision of affordable housing.</p>
Mr Terry Fuller	Director of Partnering Taylor Wimpey	<p>The Council must have produced an up to date Strategic Housing Market Assessment that meets the requirements of the now published government guidelines. That document appears to be missing though it is referred to – please publish the SHMA so that it can be interrogated and examined otherwise the basis the SPD is founded on is flawed.</p>	4.9	paragraph	<p>The SHMA is being prepared jointly with the other Greater Manchester authorities and it is due to be completed in May 2008. The Housing Needs Assessment provides an evidence base for the SPD. The Council did not want to hold up preparation of the SPD & Planning Guidance until the SHMA has been completed because of the urgency of addressing this issue for Manchester residents. Following publication of the SHMA the Council will review the SPD and Planning Guidance if necessary, and the SHMA will provide part of the evidence base for the Core Strategy.</p>
Mr Terry Fuller	Director of Partnering Taylor Wimpey	<p>The SPD acknowledges that there is an oversupply of social rented and private rented, and as such there can be no evidence to support the Council's claim for more affordable, and certainly not social rented.</p>	4.9	paragraph	<p>The Housing Needs Assessment shows a net annual need of 716 social rented units. The Council is aiming, as part of its wider regeneration agenda outlined in the Community Strategy, to increase the percentage of households who are owner occupiers and the number of families in the City, therefore the SPD & Planning Guidance asks for 15% of units to be provided for intermediate home ownership and just 5% social rented. The assessment of need will be</p>

					considered on a site-by-site basis.
Mr Terry Fuller	Director of Partnering Taylor Wimpey	The HNA should not confuse average house prices with average incomes, the two are not comparable and it is disingenuous to suggest the two should or could be linked. Rather the HNA should show lowest quartile prices, which are the entry level values into home ownership, rather than values that are for second or third time buyers.	4.16	paragraph	Paragraph 4.16 of the SPD & Planning Guidance uses the median price of an "entry level" terraced house to compare to average household income in Manchester, which is likely to be the lowest quartile price as it does not include other property types.
Mr Terry Fuller	Director of Partnering Taylor Wimpey	It is not for the state (either local authority or government) to determine what mortgage multiplier can or should be used for the purpose of determining housing costs. The mortgage market moves very fast, products change and become available and unless the council is providing the mortgages (which it is not) it is over prescriptive for the council to determine the same. This is yet another sign of a soviet style control economy that deprives individuals of their right to choose on what to spend their money. Please remove the multiplier of 3.5 and replace with 'shall match a range of mortgages currently available in the market place at any given time'.	4.21	paragraph	<p>A multiplier of 3.5 is used because it is the nationally recognised proportion of income, which if exceeded upon housing costs, is likely to result in financial difficulties for households; thus making housing unaffordable. (Housing Market Assessment guidance; Draft. ODPM 2005.)</p> <p>Even if mortgages are offered at higher multipliers there is nothing to stop people using these, but houses which cost more than 2.9 times a joint income and 3.5 times a single income would not be considered affordable for the purposes of this document.</p>
Mr Terry Fuller	Director of Partnering Taylor Wimpey	<p>We are not convinced that the HNA is robust, and in any event it is not the position of a HNA to make recommendations that may result in policy changes, it is the domain for Council Members to make policy in the light of officers' reports and recommendations.</p> <p>The 15 unit threshold has not been proven, and a</p>		Targets and Tenure	<p>The Housing Needs Assessment provides an evidence base, which was reported to the Council's Executive Committee, and used to underpin the principles of the SPD. The policy direction of the SPD was determined at this Committee by members.</p> <p>The 15-unit threshold is taken from PPS3 that requires local authorities to set out the range</p>

		test of 'soundness' has not been demonstrated in the document. Therefore please remove the new threshold until the test of soundness has been proven through the proper planning process.			of circumstances in which affordable housing will be required, stating, "the national indicative minimum site size threshold is 15 dwellings".
Mr Terry Fuller	Director of Partnering Taylor Wimpey	The same applies to the tenure split. Under PPS1 Para 26iii/iv, it is for the Council to justify and demonstrate how each policy will be resourced. This effectively means the Council has to produce a business plan to show that any and every new policy will not delay or reduce land supply. The Council must have produced such a business plan prior to preparing this policy and tenure split and this should be removed from the SPD. Please provide the business plan in accordance with PPS1 or remove the tenure split. In the mean time please remove all reference to a target of 20% affordable split 5% rent and 15% intermediate, as it is not substantiated under PPS1 Para 26 ibid.		Targets and Tenure	Affordable housing provision will be dealt with on a site by site basis rather than there being a prescriptive policy that would require an implementation plan. As stated in the Targets and Tenure section the tenure of affordable housing provision will be targeted to address specific area based need.
Mr Terry Fuller	Director of Partnering Taylor Wimpey	The council has gone way beyond its bounds of legal powers. We would refer you to 'Delivering Affordable Housing' Para 44, which clearly you have not considered. Non-RSLs can and will own affordable stock and it is not for the council to consider otherwise. Please remove the whole of this paragraph restricting the ownership and management to RSLs. Indeed in 'DAH' Para 49 states the Council can not prescribe the provider, and Para 86 in that planning obligations should be in the adopted local plan, not the SPD. It also fails Circular 5.50 Para b5. As this is so contrary to Government planning policy you must remove it.	5.10	Paragraph	Wording will be added to the end of paragraph 5.10 to state, "other alternative mechanisms for owning/managing affordable housing are welcome. Non-RSLs can and will own affordable stock."

Mr Terry Fuller	Director of Partnering Taylor Wimpey	Clearly the council is not aware of the Landlord and Tenant Act 1985. The council by virtue of PPS1 Para 30, cannot have a planning policy that cuts across other primary legislation, as such service charges are controlled not by planning but by another statute. Please remove reference to service charges.	5.13	Paragraph	The Council has no powers to change the level of service charge. However it will not consider housing to be affordable if there is a high service charge. Affordability is about the total housing costs i.e. rent plus a service charge if applicable – socially rented or intermediate housing costs cannot be considered in isolation.
Mr Terry Fuller	Director of Partnering Taylor Wimpey	Obviously the council has no policy or documented evidence for this approach and has used a quango's (English Partnerships) policy as an attempt at planning policy guidance. The Housing Corporation issues a research document 'Challenging Perceptions' in March 2005 in which while it supported mixed communities did not support peppercotting, rather good house design and management are more important. For the council to pursue a peppercotting approach it must first provide the research and conclusive evidence in the city based on customer's requirements, and then set out the financial and management impacts before considering it as a policy. This is an abject failure by the Council and must be removed, as it is not supported. The EP policy is based upon EP land holdings and is without regard to planning policy. Please remove all reference to location. As developers we support 'tenure neutral' designs (tenure blind is politically not correct and you should change your language accordingly) and this is achieved by using identical materials for all dwellings regardless of tenure. However, peppercotting is		Location of the affordable homes	<p>The Council wishes to avoid creating pockets of 'mono-tenure' housing in larger schemes as part of its policy to create sustainable mixed communities. The principle of developing mixed tenure neighbourhoods of choice has been adopted as policy after consultation in the documents: Manchester: A Sense Of Place and The Guide To Development.</p> <p>References to 'tenure-blind' design will be changed to 'tenure neutral'.</p>

		not supported and empirical evidence from a major scheme in Hampshire supports this stance.			
Mr Terry Fuller	Director of Partnering Taylor Wimpey	<p>The best means of attracting grant is through a 'reverse cascade', so that grant either changes the tenure from intermediate to another, increases floor areas or specification above building regulations, or provides affordable where it did not exist.</p> <p>Target rent only applies where SHG is invested, otherwise the council does not have a policy to seek target rents. Please alter accordingly.</p> <p>If the council imposes 5% rented and 15% intermediate then SHG will not be forthcoming, hence the need for a reverse cascade. In any event the Council must demonstrate the policy first through PPS1 Para 26iii/iv. Where is it?</p>		Funding for affordable housing	<p>Points iii and iv of PPS1 state that in preparing development plans, local authorities should "Not impose disproportionate costs, in terms of environmental and social impacts, or by unnecessarily constraining otherwise beneficial economic or social development"; and "have regard to the resources likely to be available for implementation and the costs likely to be incurred, and be realistic about what can be implemented over the period of the plan."</p> <p>The SPD policy will be applied on a site by site basis, therefore, in a situation where providing affordable housing would be contrary to these requirements, the exceptions policy in paragraph 5.30 of the SPD & Planning Guidance would dictate that the proportion of affordable housing on a particular site would be reduced. These issues will form part of negotiations between the Planning Applicant and LPA.</p>
Mr Terry Fuller	Director of Partnering Taylor Wimpey	For the Council to have prepared this approach it must have undertaken substantial calculations, to demonstrate how it will work. Please provide those calculations against a standard RLV calculation. Otherwise it is not possible for a commuted sum, because the site is unviable, to be provided! Moreover the calculation provided in		Commuted Sums	In response to this representation, a sentence has been added to the commuted sums section which states: "This sum will not exceed the cost of providing the equivalent proportion of housing on site."

		Para 5.27 is contrary to Circular 5/50 Para b7, and it must be removed.			
Mr Terry Fuller	Director of Partnering Taylor Wimpey	This is where the SPD demonstrates that it has not been prepared in the real world or in line with Government requirements. If the majority of land in Manchester is brown with an existing use value, and the affordable housing takes it below that value, then the site will not be developed. Hence the above approach is contrary to PPS3 and must be removed.	5.31	Paragraph	Paragraph 5.30 of the SPD & Planning Guidance provides for a lower proportion of affordable housing in a range of circumstances including where the provision of affordable housing would affect the viability of the scheme.
Mr Terry Fuller	Director of Partnering Taylor Wimpey	The onus is NOT on the developer but on the Council under PPS1 Para 26iii/iv to demonstrate the policy is deliverable. The stupidity of the drafting of Para 5.34 in the SPD is breathtaking and demonstrates why neither the government nor the Council will achieve its aim of more quality housing. Please remove the whole of this section, as it is financial nonsense.	5.34	Paragraph	It is stated that the onus is on the developer to negotiate reasonable site acquisition costs that take account of affordable housing provision to aid the progression of development. Abnormal costs and wider regeneration objectives will also be discussed with developers to determine levels of affordable housing on specific sites.
Mr David Hardman	Asset Protection United Utilities	<p>The Green Paper is 'Homes for the future: more affordable, more sustainable' and this SPD has concentrated on affordability. United Utilities is keen to promote sustainability in terms of potable water efficiency and avoiding development where there is a high risk of flooding. We are aware that the Environment Agency are promoting 'water neutrality' for the Growth Bid areas. If you wish to promote water neutrality you should be aware that United Utilities facilitates this in the following ways:</p> <ul style="list-style-type: none"> • Free fitting of water meters on request 	3.4	paragraph	The design section on page 24 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.

		<ul style="list-style-type: none"> • Free distribution of cistern displacement devices • Promotion of water butts • Private supply pipe leak repair service without charge in certain cases <p>Further details are available on the United Utilities website www.unitedutilities.com</p>			
Mr David Hardman	Asset Protection United Utilities	United Utilities endorse the requirement that affordable homes are built to the same standard as other housing and in this respect the importance of potable water saving devices and placing development outside high flood risk areas is paramount to United Utilities.		Design	Noted
Mr Phil Lally	GONW	We have no comments to make on the SPD		Document	Noted.
Mr Steven Broomhead	Chief Executive NWDA	The NWDA is generally supportive of policies in the SPD & Planning Guidance		Document	Support welcomed.
Mr David Miller	Head of Planning (UK North) Dandara	<p>Dandara reiterates the views they expressed on the informal consultation draft SPD & Planning Guidance in October 2007.</p> <p>Dandara challenges 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</p>		Document	<p>Providing for Housing Choice will be introduced in March. Its initial status will be as Planning Guidance.</p> <p>The Government has proposed changes to Planning Policy Statement 12 (PPS12) 'Local Development Frameworks', and amendments to the Planning and Compulsory Purchase Act 2004. These changes are likely to come into force in the late spring 2008. The proposed</p>

		not new policy...” It follows that the Local Planning Authority cannot insist upon Affordable Housing.			<p>changes will allow Supplementary Planning Documents to be adopted as SPD where they correspond to policy in Regional Spatial Strategies and/or National Policy. When these changes are made, Providing for Housing Choice will be adopted as SPD. Providing For Housing Choice corresponds to the provisions of PPS3 and policy L5 of the Draft Regional Strategy.</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”.</p> <p>This policy will help the Council to deliver UDP saved policies H1.2 and H1.5. They aim to provide a wider mix of housing – one element of which is affordable housing, as mentioned in the Reasoned Justification to Policy H1.2.</p> <p>Although the Planning Guidance and SPD 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>
Mr David Miller	Head of Planning (UK North)	The Council needs to be pragmatic in its insistence upon enforcing related housing policies including:- DFA2: Sustainability criteria:		Document	Manchester City Council wishes to encourage development of the highest quality. National planning policies require local planning

	Dandara	Development mix (i.e. the city centre “Manchester mix”); Public realm; Design styles; Density; Car parking.			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 5.30 or exceptional costs will be considered if it can be demonstrated that they might prejudice development.
Mr David Miller	Head of Planning (UK North) Dandara	The Council needs to be receptive to other: “sustainable and realistic lending calculations based upon the 25k household income”		Document	Paragraph 2.8 of the document states that “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 ratios identified at paragraph 4.21”
Mr David Miller	Head of Planning (UK North) Dandara	In terms of city centre apartment development, especially so on sites that are already owned and controlled, it must be acknowledged that no provision for affordable housing will have been made. This is wholly reasonable on the basis that the development plan does not provide for any such requirement.		Document	The exceptions policy in Paragraph 5.30 states that where “A legally binding agreement had been reached on land values by 1 st December 2007 which had not incorporated the cost of affordable housing” a lower proportion of affordable housing, a variation in the proportions of socially rented and intermediate housing or a lower commuted sum may be permitted. It is expected that developers will have been aware of the Council’s forthcoming approach to affordable housing from this date. so will have been able

					to take this into account when purchasing land after 1 st December 2007
Mr David Miller	Head of Planning (UK North) Dandara	Site threshold of 0.3 might prejudice small sites built out at 50dph.		Thresholds	The Thresholds section states “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”.
Mr David Miller	Head of Planning (UK North) Dandara	Given the Council's underlying driver of increasing home ownership, with specific emphasis to the city centre in this instance, the Council is encouraged to consider options above and beyond the sale of property via RSLs involving shared ownership/equity solutions.		Targets and Tenure	Paragraph 2.8 of the document states that “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 and share good practice on financial packages which meet identified need within the income/house price ratios identified at paragraph 4.21”. Paragraph 5.10 has been amended to clarify this point.
Mr David Miller	Head of Planning (UK North) Dandara	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	Table 5.1	Preferred dwelling size mix	The preferred dwelling mix set out in Table 5.1 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. The emphasis upon intermediate housing reflects the Council's wish to increase the proportion of home ownership.
Mr Dave Brown	Labour Party Disabled Members Group	MCC summary of handwritten letter: policies should follow the principles of social inclusion and be in accordance with the DDA. Ensure tenants' rights specifically disabled		Document	The Council encourages developers to follow the guidelines set out in the Design for Access 2 Guidance. Wording will be added to the end of the Design policy paragraph (after 5.23) to

		tenants - not covered in this document.			state "...and take account of the relevant provisions of Design for Access 2".
Ms Helen Barrett	Planning Liaison Officer Environment Agency	At this stage the Environment Agency has no objections or comments to make on the proposed Supplementary Planning Document.		Document	Noted.
Mr Ahmet Djemal		<p>This entire document assumes that current economic conditions will continue. I believe that this is unwise.</p> <p>We are beginning to see the effects of hitting limits in our systems and the current economic systems will be subject to collapse. No mention is made of energy independence for these new homes and given the reality of peak oil and the likely impacts to the energy distribution systems by cascading systems failure (See Olduvai theory) it would seem to me to be unwise to commit to further growth in conventional housing stock that may not be habitable without current energy systems.</p> <p>I find it very worrying given the weight of evidence that the predictions in the Club of Rome 'Limits to Growth' study are in fact happening now that absolutely no thought is being given to how our housing stock might continue to be functional in the face of the vast changes in our systems we will see. It will also be interesting to see how people might manage mortgages without</p>		Document	<p>In line with government policy, the Council is aiming to ensure that everyone living in Manchester has the opportunity to live in a decent and affordable home; and at present it is expected that developers will be building conventional houses/flats to meet this requirement. The Guide to Development in Manchester SPD & Planning Guidance encourages developers to provide homes that achieve a high sustainability rating under the Government's Code for Sustainable Homes.</p>

		functioning banks. Fractional reserve banking requires permanent growth to function and shrinking energy and commodity reserves guarantee the end of the current paradigm within the foreseeable future. We urgently need some new thinking from the council on this.			
Mr Robin Buckley	Redrow	<p>The draft SPD is contrary to the principles that apply to any supplementary planning document, as set out in paragraph 2.43 of PPS 12. The first of these principles requires that an SPD must be consistent with national and regional planning policies. In that regard, PPS3 sets out the approach to the provision of affordable housing through the planning process and is explicit in stating:</p> <p>“In Local Development Plan Documents, Local Planning Authorities should” (my emphasis).</p> <p>Therefore proposals to set targets for affordable housing, set targets for different tenures, set thresholds for provision, impose size and type requirements and set out an approach to seek developer contributions should be contained within a Development Plan Document, not a SPD as the Council propose. Whilst it is acknowledged that the Council may wish to move to a new policy approach without delay, this must be done in a manner consistent with national planning policy. Indeed, attention is drawn to the High Court decision in Barratt V Nottingham City Council (CO</p>		Document	<p>Providing for Housing Choice will be introduced in March. Its initial status will be as Planning Guidance.</p> <p>The Government has proposed changes to Planning Policy Statement 12 (PPS12) ‘Local Development Frameworks’, and amendments to the Planning and Compulsory Purchase Act 2004. These changes are likely to come into force in the late spring 2008. The proposed changes will allow Supplementary Planning Documents to be adopted as SPD where they correspond to policy in Regional Spatial Strategies and/or National Policy. When these changes are made, the relevant parts of Providing for Housing Choice will be adopted as SPD. It corresponds to the provisions of PPS3 and policy L5 of the Draft Regional Strategy.</p> <p>Paragraph 29 of PPS 3 states that “In Local Development Documents, Local Planning Authorities should...”, not “In Local Development Plan Documents...” as stated in this comment. Redrow’s definition would mean such policies had to be in Development Plan Documents and would have development plan status, whereas PPS 3 states that they merely</p>

		Ref: CO/5392/2006), which quashed those parts of an SPD that should have been included in a DPD.			<p>have to be in a Local development Document, such as this SPD.</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”. 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.</p> <p>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.</p>
Mr Robin Buckley	Redrow	At paragraph 4.9 reference is made to the Council’s most recent Housing Needs Assessment as empirical evidence for a high level of affordable housing. However, paragraph 11 of 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. Moreover,	4.9	paragraph	The Housing Needs Assessment was carried out in advance of recent guidance and will inform the sub-regional SHMAs that are currently being worked up across local authorities. 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

		there does not appear to be any clear explanation for adopting a 30% requirement, in any event.			precautionary principle by adopting a lower affordable housing target of 20% that will provide more affordable housing units whilst not deterring investment as part of a more flexible approach.
Mr Steve Staines	Friends Families and Travellers	<p>MCC summary of postal response:</p> <p>The SPD does not mention the needs of Gypsies and Travellers. Gypsy and Traveller sites managed or owned by the Local Authority or a RSL are also types of affordable housing in line with CLG guidance "Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers" (May 2007) which states in paragraph 37: "In considering the location of sites, local planning authorities need to be aware that Gypsy and Traveller sites are considered as affordable housing where they are owned and managed by a local authority or Registered Social Landlord. Local planning authorities may therefore negotiate s106 agreements with developers to include Gypsy and Traveller sites in new developments, ensuring that mixed communities are created from the outset." Hence the SPD should give due consideration to the needs of Gypsies and Travellers.</p>		Document	<p>The document will be amended to refer to Gypsies and Travellers' housing needs. A new section will be added after paragraph 5.16 called "Gypsy and Traveller Housing Needs" which will state: -</p> <p>"Government Guidance states ("Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers", May 2007 - paragraph 37) that Gypsy and Traveller sites are considered to be affordable housing where they are owned and managed by a local authority or Registered Social Landlord. The Association of Greater Manchester Authorities is currently carrying out a Gypsy and Traveller Accommodation Assessment that is due to be published in June 2008. Manchester City Council will use the results of this study to inform the development of a criteria-based policy in the Core Strategy that will provide a framework against which to assess proposals for Gypsy and Traveller sites.</p>
Ms Janet Bellfield	Planning Advisor Natural England	The subject matter of the SPD does not directly or significantly relate to our environmental interests and we therefore have no comments to make on it.		Document	Noted.

Ms Deborah Smith	Turley Associates	<p>I am pleased to note that the Manchester Housing Needs Assessment is now available as a background document to the draft SPD, and that an Access to Affordable Housing Strategic Policy Document and Affordable Housing Trends Technical Report have also been published. However, there is no evidence of any guidance relating to innovative financial packages.</p> <p>I remain of the view that it would be premature to formally adopt policies relating to affordable housing provision until such time as the aforementioned guidance is made available</p>	2.4	Paragraph	The Council is working with developers via a competition to provide a home for an average £25,000 income household, as stated in paragraph 2.4 of the document. Prior to the adoption of this document as SPD later in 2008, the Council will seek to expand its existing work on developing equity products.
Ms Deborah Smith	Turley Associates	<p>I welcome the acknowledgement by the Council, in its response to my representations at informal consultation stage that, until such time as the SPD is formally adopted by the City Council, its provisions will be afforded only limited weight.</p> <p>It would be helpful however for the weight attributable to the document to be reflected in the text of the document itself.</p>	2.9	Paragraph	Paragraph 2.9 has been re-worded to clarify the status of the document. It reads: "This document has been initially adopted as Planning Guidance in March 2008. Those sections shaded in purple will be formally adopted as having SPD status later in 2008.
Ms Deborah Smith	Turley Associates	The definition of 'City wide' is still open to interpretation. The beginning of the shaded section should be amended to read "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"		Targets and Tenure	The Council does not consider the proposed wording is appropriate, as it would make the targets too onerous for the development industry and the policy too inflexible in its application.
Ms Deborah Smith	Turley Associates	I reiterate my concern over the resistance shown within the draft SPD to one-bedroom units and the apparently selective use of the findings of the	5.18	paragraph	20% of affordable housing provision (Table 5.1 P5.21) has been indicated as the proportion of smaller units that will normally be sought on

		<p>housing needs survey to suit the drafted policy framework.</p> <p>For example, paragraph 5.18 states that there is an identified need for one-bedroom accommodation. It goes to state, however, that the council does not consider that substantial proportions of such small housing will be sustainable in the longer term. This statement is not supported by any data or statistics that demonstrate that this is the case. Indeed, it is widely accepted that there is a long term demographic trend throughout the UK for an increase in the proportion of single person households.</p> <p>Further I am concerned by the statement indicating that one bedroom need should be met by two bedroom units. In a document which encourages affordability, this is a counterproductive statement which seems to assume that anyone on a low income can afford a two bedroom unit just as easily as a one bedroom unit.</p>			<p>each site where appropriate. This is negotiable within the context of local housing need and demand. The Council recognises that while single-person households may be increasing they may not necessarily find one-bedroom units appropriate to their needs. In addition, the restricted size of smaller properties including one bedroom units are more difficult to adapt to meet lifetime homes or to meet the needs of Design for Access 2. The current over supply of smaller units conflicts with, in some instances, the Council's objective to increase housing choice for families wishing to remain in or move to Manchester.</p>
Ms Deborah Smith	Turley Associates	<p>The continued suggestion that no more than 6 social units of accommodation should be grouped together and that the provision of large apartment blocks of only social housing units is not acceptable, is unnecessary and unduly prescriptive.</p> <p>As stated previously, depending upon the</p>		Location of the affordable homes	<p>The document does not make "specific requirements" about design. Individual negotiations will take into account financial marketing and design considerations on each scheme.</p>

		<p>particular circumstances of an individual proposal it may be that provision in this format is the most appropriate / only way of achieving affordable housing provision on site.</p> <p>The Council's response to my initial representations on this matter argues that the policy is worded in this way to ensure high levels of design quality through integration of affordable units. Design quality can be controlled through other policies (e.g. UDP and Guide to Development). Our representation was, and remains, a commercial observation.</p> <p>I respectfully request that this aspect of the policy should be re-drafted to express such matters as 'aspirations and targets' rather than specific requirements.</p>			
Ms Deborah Smith	Turley Associates	<p>I acknowledge the inclusion of a formula for the calculation of commuted sums. However the formula is questionable in terms of its transparency. For example, on what basis has the 'affordable' price be concluded to be c.50% of the open market value? If the Council proposes to adopt a standardised formula it is important that the basis of all aspects of it are transparent and easily understood.</p>		Commuted Sums	<p>Wording has been added to the commuted sums Section as follows: "This sum will not exceed the cost of providing the equivalent proportion of housing on site."</p>
Ms Deborah Smith	Turley Associates	<p>I welcome the recognition within the exceptions that concessions should be made where legally binding agreements had been reached on land values before affordable housing requirements</p>	5.30	Paragraph	<p>A report to the Council's Executive in July highlighted its intention to bring forward affordable housing policies in the form of SPD/Planning Guidance. The Draft Providing</p>

		<p>were identified. We do not, however, agree that this date should be taken as 1st December 2007.</p> <p>It is unclear why this date has been chosen. On 1st December 2007, the first draft of the document had only just been published for informal consultation and those informal consultation responses were yet to be released. On 1st December 2007, the Housing Choice document could not, therefore, be afforded any weight.</p> <p>I would emphasise that the Council's response to our original observation on the status of the SPD confirmed that the SPD could be afforded only limited weight until it was adopted (see response to our comments on paragraph 2.9 above). This particular exception should be applied to sites where legally binding agreements had been reached on land values prior to the date on which the SPD is formally adopted by the Council.</p>			<p>For Housing Choice also indicated that the Council proposed to suggest a date by which negotiations should have been completed, prior to the adoption of Planning Guidance or SPD status. The Informal Consultation was completed upon the 9th of November. Developers will have been aware of the Council's forthcoming approach to affordable housing from July, so will have been able to take this into account when purchasing land after this date.</p>
Mr Kristian Marsh	Network Strategy North West Highways Agency	I confirm that the Highways Agency has no comments to make on this document.		Document	Noted
Mr Andy Frost	Director Jones Lang La Salle	It is imperative to develop housing according to local demand, need and other material circumstances. Affordable housing should be assessed on an area specific basis to ensure that there is a need and that new housing contributes		Document	Noted. See detailed comments and responses below.

		positively to the local housing market. Targets should be applied flexibly, taking into account the local housing market, the availability of public subsidy and other planning objectives.			
Mr Andy Frost	Director Jones Lang La Salle	MCC should be cautious not to provide affordable housing and social rented sector housing in areas already dominated by such tenure. In such areas, 100% owner occupation should be preferred on new schemes to diversify tenure and create greater buoyancy in the market to attract people to live in these areas from elsewhere.		Targets and Tenure	Schemes are to be assessed on a site-by-site basis. This assessment will take account of the social housing provision in the immediate vicinity when calculating the social housing requirements. In areas with a sufficient supply of social housing, the amount of intermediate and social housing could vary from the specified targets. The Council wishes to offer people the choice of being able to buy into the property market, hence its encouragement of joint equity schemes, and, its hope that by working with the development industry, innovative financial products will be developed to increase home ownership.
Mr Andy Frost	Director Jones Lang La Salle	We welcome the exception to the policy that a lower proportion of affordable housing; a variation in the type of affordable housing split; or commuted sum can be provided if there is a high proportion of Social Rented Housing (60%) or in areas where there are lower than average incomes. However, MCC need to ensure that 100% owner occupation can also come forward on sites if justified. The policy exemptions and wording should therefore facilitate this.	5.30	Paragraph	The Council considers that intermediate housing is a step towards home ownership where people cannot afford the full market price. The Exceptions policy would enable diversions from this approach where appropriate. In exceptional circumstances, this might mean no affordable housing.
Mr Andy Frost	Director Jones Lang La Salle	We are happy with the split of social and intermediate housing and that the balance can be adjusted in areas where there is a high proportion		Targets and Tenure	Noted.

		of Social Rented Housing. PPS 3 (Para 29) states that a sufficient supply of intermediate affordable housing can help address the needs of key workers and those seeking to gain a first step on the housing ladder, reduce the call on social rented housing, free up existing social rented homes, provide a wider choice for households and ensure that sites have a mix of tenures.			
Mr Andy Frost	Director Jones Lang La Salle	In terms of the preferred sizes of affordable dwelling size, it is essential that this should be varied in each neighbourhood according to existing house types and demographics, framed within the context of need, market demand and wider planning objectives.	Table 5.1	Preferred dwelling size mix	The site-by-site approach to providing affordable housing allows variance as stated in the text following table 5.1. The SPD states "The types and size of housing provision suitable for each site will vary and should take account of the site relative to services, facilities and public transport; and the type and form of development appropriate to the character of the area."
Mr Andy Frost	Director Jones Lang La Salle	<p>We are concerned that the site size threshold for affordable housing is set at 0.3ha. The document explains this is on the basis that 50 dwellings per hectare can be achieved on sites based on gross developable area. However, this may conflict with the wider planning policy objectives.</p> <p>The Manchester Guide to Development SPD (April 2007) encourages residential developments to provide on-curtilage parking to the side of the dwelling. Furthermore, apartments out of the City Centre are discouraged and family accommodation provision is promoted. In addition, the Design for Access 2 (December</p>		Thresholds	<p>The minimum site threshold and housing density assumptions have been arrived at using figures calculated from recent Planning Application Approvals. Schemes will be considered on an individual basis and where affordable housing would conflict with achieving other planning objectives, targets could be amended under the exceptions paragraph (5.30).</p> <p>The Council will keep the thresholds under review and alter them if appropriate.</p>

		<p>2003) document places further constraints on density, encourages provision of homes which are accessible for disabled visitors, and a proportion of homes which are fully DDA compliant.</p> <p>To deliver an optimum scheme to meet the requirements of the Manchester Guide to Development and the Design for Access 2 document, it may not be possible (taking in the above factors) or desirable to achieve a density of 50 dwellings per hectare on site. A density of 50 dwellings per hectare on 0.3ha would enable 17 dwellings to be developed (gross). In terms of commercial viability of development, regardless of density, affordable housing can only be realistically provided on a site of 25 units or more due to the impact of servicing and infrastructure costs. Therefore it is unreasonable to set this as a threshold for affordable housing.</p> <p>A further issue with the threshold of 0.3ha is that the gross development area is applied. This does not allow for any reduction in developable area created for example by abnormal ground conditions, easements, design quality considerations (e.g. highway safety, flood risk, ecology, tree protection etc). Therefore we recommend the site threshold for affordable housing should be based on the net developable area of the site.</p> <p>The threshold will also counter the City's</p>			
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		<p>regeneration objectives by placing a restriction on the ability for developers to bring forward smaller pieces of brownfield land, or incidental open space, which are essential to bring forward to improve the quality of neighbourhood areas within the City and stimulate wider regeneration.</p> <p>PPS3 (Para 29 page 11) states that Local Planning Authorities will need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities. Accordingly, for the reasons outlined it is essential that MCC conduct greater research into the 0.3ha threshold set out in the Draft SPD. Once this work is undertaken and published we reserve the right to comment again. Above all, if a site size threshold triggering affordable housing provision is imposed then it should not be treated as a mandatory requirement but as a guideline only, which allows other planning objectives, where necessary, to take priority.</p>			
Mr Andy Frost	Director Jones Lang La Salle	<p>We welcome the exceptions put forward through the Draft SPD, which ensure that provision of affordable housing is provided where necessary, i.e. not in areas which have an existing supply of affordable housing or a high proportion of social rented stock. Furthermore it is crucial that MCC allow exceptions where the financial impact of the provision of affordable housing combined with</p>	5.30	paragraph	Noted. Affordable housing provision will be considered in a single package with other planning related requirements.

		<p>planning obligations or abnormal costs of bringing a site forward, unduly undermine the development viability – particularly where this is to the detriment of wider regeneration and other planning objectives.</p> <p>It is essential that affordable housing and planning requirements do not prevent sites from coming forward, particularly in regeneration areas or where there are other environmental, economic / social benefits to capture.</p>			
Ms Michele Brown	Associate Partner Drivers Jonas, on behalf of Ask.	<p>1. Affordable housing products which can be linked to individuals and not just units should be given consideration to ensure that flexible products which meet the specific needs of Manchester residents are delivered.</p> <p>2. It is not clear if the 43% 3 bed + target is for all affordable tenures or just Socially Rented. If it includes Intermediate Housing, this is an extremely high target and will be particularly onerous to deliver. It will undoubtedly create affordability issues in itself given the likely value of these properties.</p> <p>3. The "open book financial assessment" to consider what proportion of affordable housing provision is viable is welcome but it is critical that there is an agreed methodology and process to ensure that this actually works. Adopting a preferred viability model, e.g. Housing Corporation Economic Appraisal Toolkit, may be</p>		Document	<p>1. The Council would positively welcome, and is working with the Development industry to, deliver financial products to improve access to affordable housing. This forms part of the wider Affordability Strategy to increase home ownership.</p> <p>2. The preferred dwelling mix shown in Table 5.1 applies to both intermediate and socially rented housing and this has been made clearer in paragraph 5.21 of the SPD & Planning Guidance. These targets are indicative but there is a need to provide family accommodation to attract more families to Manchester therefore larger houses are requested.</p> <p>3. The Council is currently looking at various products, including the Housing Corporation Economic Appraisal Toolkit, which would help to make this process simpler and transparent.</p>

		<p>the best strategy for ensuring consistency of approach, whilst also giving developers certainty so that they can accurately model this when negotiating land deals. It is also critical that the City Council ensures that it has the capacity (technical as well as time) to process these assessments, to ensure that the development process is not unnecessarily hindered.</p> <p>4. The affordable proportion requirement is currently noted to be measured only on a unit basis. It is important to build in flexibility and therefore also allow measures against habitable rooms and / or area. Utilising only a unit measure provides a disincentive to build larger units.</p> <p>5. The need to provide Social Rented units aimed at the City's existing elderly population, which would in turn free up under-occupied Council houses, is not currently expressed clearly in the draft Paper.</p>			<p>The text of Providing For Housing Choice has been amended accordingly.</p> <p>4. Calculating the affordable housing provision using the number of habitable rooms would unduly complicate the process.</p> <p>5. The Council recognises the need for affordable housing for elderly people but does not want to be overly prescriptive since negotiating housing mix on particular sites will depend on local housing needs; the document aims to increase access to intermediate housing.</p>
Mr Paul Entwistle	North West Regional Assembly	Make reference to the view of the EiP Panel report that affordability targets should be included in the next review of RSS.	3.6	paragraph	Agree. Wording has been added to the Regional Policy section to refer to this.
Mr Paul Entwistle	North West Regional Assembly	Make reference to the review of the Regional Housing Strategy.	3.8	Paragraph	Agree. Wording will be added after 3.8 to state that the Regional Housing Strategy is currently under review.
Mr Paul Entwistle	North West Regional Assembly	Broadly welcome the reference in paragraph 3.2 for the need for a good evidence base and for close working with the regional bodies.	3.2	paragraph	Support welcomed.

Mr Paul Entwistle	North West Regional Assembly	<p>Welcome recognition of the need to make better use of the existing housing stock, which is to be dealt with through the affordable housing strategy. This approach is broadly consistent with the emphasis on reusing existing buildings in Adopted and Submitted Draft RSS policies DP1 and the recommendations of the EiP Panel and Adopted RSS policy UR6 and Submitted Draft RSS policy L3.</p>		Document	Support welcomed.
Ms Lucy Michalski	Home Builders Federation	<p>The HBF believes that any provision for affordable housing should include discounted market housing in the definition. A narrow focus on largely public sector affordable housing provision ignores the contribution the private sector makes to meeting affordable housing demand, and tends to stifle private sector initiatives which can contribute towards meeting the Government's housing objectives, as well as meeting the desire for home ownership among a large section of the population.</p> <p>Therefore, the HBF would urge LPAs to take much greater account of private sector contributions to the supply of affordable housing and to ensure that their policies are flexible and encourage, rather than discourage the contribution of the private sector. Low cost market housing should also be considered as part of the housing mix as it provides a housing for those households at the lower end of the market who would otherwise be concealed or occupy a social rented or intermediate dwelling. This should be</p>		What is Affordable Housing?	<p>The Council has adopted the definition of affordable housing contained in PPS3. This does not include Low cost market housing. However, the Council accepts the role low cost market housing can play in the overall housing mix. The Council is in discussion with Central Government to add flexibility to this policy requirement of PPS3.</p>

		offset against the affordable housing requirement.			
Ms Lucy Michalski	Home Builders Federation	<p>The planning policy system clearly operates on the basis of policies being considered sound. Soundness is determined as a result of an independent examination against a background of a sound and robust evidence base. In this case the evidence base would be a Strategic Housing Market Assessment carried out in accordance with the Practice Guidance issued by the Government. However, you have no such evidence base and are relying on an outdated Housing Needs Survey, which has not been tested or subject to stakeholder consultation. PPS3 (Annex C) gives the requirements of the outputs from Housing Market Assessments and states assessments should be prepared collaboratively with stakeholders, suggesting that the involvement of the industry is a key part of the methodology. PPS3 requires assessments to be evidence based and for local planning authorities to undertake regular and frequent monitoring.</p> <p>The Housing Market Assessment is particularly important since, to a large extent, the achievement of the delivery of affordable housing is very much dependent on the delivery of market housing, as a large proportion of the annual supply of new affordable housing comes on the back of market housing, and is funded and delivered by the house building industry.</p> <p>It is important to note that Housing Needs surveys</p>	4.9	paragraph	<p>The Council completed its Housing Needs Assessment in 2007. It was commissioned prior to the guidance being published upon SHMA. The Council is currently undertaking with other AGMA authorities SHMAs that will enhance the evidence base. The Council was obliged from the evidence within the Affordability Strategy to press ahead and tackle the lack of housing choice resulting from the increase of house prices to average incomes. It conducted stakeholder events with both the Development industry and RSLs during the drafting of the SPD.</p> <p>The Housing needs Assessment was based upon an extensive questionnaire amongst a significant sample of the whole population.</p>

		are now changing and the Government is to place increased emphasis on Housing Market Assessments. The HBF is concerned that until this work is complete the present policy is not founded on a robust and credible evidence base.			
Ms Lucy Michalski	Home Builders Federation	The Council will be aware that it cannot seek all units to be retained and used as affordable housing in perpetuity as paragraph 38 of PPS3 allows purchasers of shared equity schemes to buy the final share and staircase out.	5.10	paragraph	Where people choose to “staircase out”, monies from the sale of equity will be recycled to provide replacement affordable provision if this forms part of an S106 agreement. As stated above, the Council also supports other innovative solutions to providing affordable housing.
Ms Lucy Michalski	Home Builders Federation	Ensuring that everyone has the opportunity of a decent home means, at the outset, ascertaining what everyone's needs are (again, not just the needs of the minority not able to satisfy their own needs). Hence, the requirement to carry out a local housing market assessment. Consequently, any housing mix should take account of the findings of the latest aforementioned assessment.		Property Type	The Housing Needs Assessment took account of the needs of the whole population. It identified particularly those people in housing need resulting from overcrowding, poor facilities and financial difficulties. It also identified those concealed households and the requirements of people wishing to move into Manchester. Other Council research has been used to modify the requirements of the policy so that it meets other regeneration objectives and the needs of people wishing to access market housing.
Ms Lucy Michalski	Home Builders Federation	The HBF believes that the affordable housing provision should be provided in small clusters, as pepper potting is now being discredited on a national basis. In addition the provision of affordable housing in clusters is often easier for RSL management purposes and tailoring service charges according to differing incomes and		Location of the affordable homes	The exact design and location of affordable housing units will be subject to negotiation between those seeking Planning Application and the LPA. However, the Council does not wish to see social housing as part of mono-tenure development.

		needs.			
Ms Lucy Michalski	Home Builders Federation	The HBF welcomes the Council's approach in accepting developer contributions in lieu of on-site provision where appropriate.		Commuted Sums	Noted.
Mr Paul Daly		Whilst it is vitally important that current legislation and standards in terms of sustainable environmental performance and access are achieved and even surpassed in new development where possible, 'the highest design standards' should also encompass the highest visual design standards too. The desirability of an area in relation to pride of residents and its attractiveness to new residents (renting or buying) is determined to a significant extent on the image of an area, afforded by the visual quality of the buildings. Greater attention should be paid to the quality of visual amenity afforded to all new housing, in terms of quality of materials, detailing and relationship to context.	2.4	paragraph	The Development Guide and requirements related to Conservation areas will attempt to ensure the highest possible standards are achieved.
Ms Jenni Viitanen		The retention of young population in Manchester will not be entirely dependant on house prices. As MCC's regeneration plans point out, only parts of the so-called "sunshine belt" of the city are able to retain the professional dwellers in the city. The Council's main concern really is not the supply of (affordable) housing, but making its neighbourhoods a more desirable place to live in the first place Otherwise first time buyers will continue to use Mcr as a stepping stone and as their income increases, they will leave Manchester for the "better" areas in the	4.16	Paragraph	The issues of making Manchester's neighbourhoods a more desirable place to live is dealt with by a range of Council strategies including the overarching Community Strategy. Planning policies that will work towards achieving this will be contained in the Local Development Framework, of which this Supplementary Planning Document & Planning Guidance is just one document. It focuses specifically upon widening the mix of new housing provided in Manchester, to provide more affordable housing options.

		neighbouring Districts.			
Harrow Estates		<p>Harrow Estates consider that there is no requirement for a policy regarding affordable housing in Manchester due to the high levels of social and low cost housing distributed across the City.</p> <p>There are large parts of the City that remain affordable and Harrow Estates consider it would be more equitable for the Council to implement a policy based on local circumstances and site specifics rather than a city-wide average.</p> <p>We suggest that there should be no requirement for affordable housing in areas with existing high levels of social and low cost housing. Affordable housing should be based on identified need and considered on a site-by-site basis. It is suggested that areas with affordability ratios (as shown on Map 4.1). At or below 3.5 should be exempt from affordable housing provision.</p>	4.16	Paragraph	<p>Much of the existing low cost housing is in a poor state of repair, small and unattractive to families wishing to remain or consider moving to Manchester. Paragraph 4.16 of the SPD & Planning Guidance states that whilst many parts of Manchester offer house prices which could be considered affordable, these do not provide an adequate range of choice to meet the needs of, or retain, younger households in the City.</p> <p>It is inappropriate not to include the areas with an affordability ratio of less than 3.5 times household income from this Policy, as this would exclude all of East and large parts of North Manchester. Large numbers of new housing units will be built in these areas compared to South Manchester. If these were excluded from the policy the amount of affordable housing provided in the City would be vastly reduced and the Council would be missing the opportunity to ensure that housing, of different sizes and tenures, planned as part of the redevelopment of these areas, would remain inaccessible to a large section of Manchester residents.</p> <p>The exceptions policy in paragraph 5.30 allows for a lower proportion of affordable housing or a lower proportion of social rented to be provided in cases where there are high</p>

					levels of social rented housing or where such provision would prejudice regeneration objectives.
Harrow Estates		The statement at paragraph 5.3 of the Draft SPD), taken from the HNA, that 'there are no very good reasons to vary the target across sub-markets' is taken out of context. The HNA recommendation relates solely to need and stresses that other issues such as viability should play a part in the location of affordable housing. Moreover the HNA argues that as the more prosperous areas relate to the areas where affordability rates are highest, this is where affordable housing should be required. It is Harrow Estates view that, as the areas where there is little requirement for affordable housing generally correspond with the areas most in need of regeneration, and where redevelopment proposals may struggle to achieve scheme viability, the provision of affordable housing in such area will jeopardise regeneration and redevelopment efforts and undermine the revitalisation of Inner Area. This related to the objective for regeneration areas to diversify housing mix/tenure through creation of new high quality housing markets and also reflects that land values are lower than in more prosperous areas.	5.3	Paragraph	The Housing Needs Assessment demonstrated that the overall citywide need could not be met on a local basis. All parts of the City should contribute to meeting this need. Over 16,000 people are contained upon local housing waiting lists. The urgency of meeting this need requires balanced provision amongst new housing units across the City. The imbalance between the current housing pipeline and providing for future needs and demand would exacerbate housing needs. Providing For housing choice states that Housing Needs and mix will be determined on a site by site basis (5.8).
Harrow Estates		The justification for key worker priority given a paragraphs 5.14.5.16 is unclear and Harrow Estates consider that the document provides an illogical and inadequate justification for this departure from established guidance.	5.14, 5.15 and 5.16	Paragraph	The section on key workers, 'Meeting the needs of the future workforce,' has been revised. The document defines "essential workers" as "those workers who are critical to the City's economic growth and who cannot

		At paragraph 5.15 of the Draft SPD) it is stated that there is no evidence of the significant labour market problems in Manchester amongst public sector employers, which are attributable to a lack of suitable housing. Harrow Estates therefore believe that it follows that there is no need to incorporate measures to prioritise affordable housing for key workers. Furthermore, the attempt by the Council to widen the definition of key workers, which by the admission of the document there is not, the Council should follow the national definition of key worker. It is not the proper role of the planning to correct disparities between incomes offered by the private sector and house prices in an area, other than by the mechanism for the delivery of affordable housing in a more general sense.			afford to buy on the market, thus leading to difficulties in recruitment or retention". A new Appendix, D, has been added which provides examples of this definition. The Council has added these provisions in response to concerns of some employers that increasing housing costs of workers in important growth sectors could in the future make recruitment difficult. The Council wishes to have the ability to react to changing circumstances.
Harrow Estates		With regard to the type of property that should be provided as affordable, the Pathfinder resident survey evidence presented to support the requirements for family accommodation refers to 51% of household planning to move 'wanting' rather than 'needing' a 3 bedroom house or larger. If this evidence is to be used as justification there should be some further qualification of the results, particularly as the findings of the HNA reveal that only 3.8% of households are overcrowded and there seems to be some disparity between the two surveys.	5.18	Paragraph	The Housing Needs Analysis (HNA) identified a need for both 1-bed and family housing. Table 5.1 suggests a split between different house sizes that is most likely to meet this need. This is negotiable on a site-by-site basis. The figures in the HNA were based upon affordable property which people moved to rather than met their exact needs. (HNA 6.15) The shortage of larger property, evidenced by growing housing waiting lists, suggests that people are likely to accept accommodation even if it is not exactly what they require. This includes accommodation for people wishing to start families. Hence, the

		<p>Furthermore, the assertion that 1 bedroom properties are not sustainable is unfounded. Harrow Estates consider that 1 bedroom properties provide the opportunity to cater for a growing number of smaller households at an appropriate density. It is considered an unsustainable use of land and resources to build larger than necessary housing and such a policy could further perpetuate under occupancy rates. Providing 2 bedroom properties as a matter of course to meet demand for 1 bed properties is likely to worsen affordable housing availability for this property type.</p> <p>The statistical data does not support the justification of the preferred dwelling site and mix. The HNA indicated an overall need for 1 bedroom properties. The proposed SPD implies that the preferred mix has been reached through assessing the identified need and the housing pipeline but further definition and justification for the preferred mix is necessary because of this discrepancy.</p>			<p>Council recognises that, while smaller households may be increasing, they may not necessarily find one-bedroom units appropriate to their needs. The Council is also keen to ensure stability within local areas. Encouraging families to stay is a vital component of regeneration strategies. In addition, One bedroom units are more difficult to adapt to lifetime homes Standard or to meet the needs of Design for Access 2 and a growing elderly population. An oversupply of one bedroom accommodation would prove unsustainable in the longer term because it failed to meet both family needs and those of other significant sections of the population.</p>
Harrow Estates		<p>With regard to funding and the issue of additionality, it is Harrow Estates. View that the approach remains controversial. Additionality can place a considerable financial burden on the developer and if sought will lead to fewer opportunities coming forward for affordable housing as the existing use value of many sites will outweigh the redevelopment value for</p>			<p>Additionality will form part of the negotiations where housing schemes are eligible for grant aid. These negotiations will be dependent upon the grant regime administered by bodies including the Housing Corporation.</p> <p>The proceeds from "staircasing" with regard to Intermediate housing will be recycled. PPS3</p>

		<p>housing. This is particularly relevant in an area that is heavily dependant upon brownfield redevelopments for it's housing provision.</p> <p>Providing the developer has not negotiated lower provision of affordable housing because of viability, the issue of additionality is not a relevant tool in negotiation of provision. Affordable housing provision should directly relate to the local needs.</p> <p>Harrow Estates consider that in addition to social rented housing. There should also be a mechanism to secure intermediate affordable housing in perpetuity to ensure the property is retained as an affordable home for the future.</p>			<p>defines affordable housing as that retained in perpetuity. The Council is only able to count such housing units as affordable in its monitoring returns to Central Government. However, the Council would wish to encourage developers to identify other approaches to meeting affordable housing need.</p>
Harrow Estates		<p>Harrow Estates object to paragraph 5.28, which indicates that commuted sums may be used to bring empty properties back into use or continued use. The aim of affordable housing policy is to increase, in perpetuity, the provision and supply of affordable homes. Unless bringing uninhabitable homes (by definition) back into habitable use, funds should not be used for the renovation, refurbishment or upgrading of existing stock as this does not increase the level of stock available.</p>	5.28		<p>Commuted sums can be used effectively to improve the environmental quality of an area, increase its attractiveness and stimulate housing markets. Generally, the Council would wish to use commuted sums to improve the supply of affordable housing and ensure it is retained in perpetuity as affordable homes.</p>
Victoria Johnson	British Waterways	<p>British Waterways note the Council's responses to the comments they made during the informal consultation stage and are pleased to see that the formal consultation draft reflects these. British Waterways request that the SPD retains these</p>		Document	<p>Noted. The changes made to the document in response to British Waterways comments are to be retained in the final draft.</p>

The following additional changes have been made to the final draft Providing for Housing Choice: (Paragraph numbers refer to the March 2008 version of the document)

- Chapters 1 and 2 - to update the document to reflect its current stage in the preparation process and clarification of its status
- Paragraph 2.11 - to set out that the document has been prepared in accordance with the Planning & Compulsory Purchase Act, the Regulations (including forthcoming amendments) and the Council's Statement of Community Involvement.
- Paragraph 4.13 - an explanation of why the Council has not used the 30% housing needs figure recommended by the Housing Needs Assessment in the document
- The parts of Chapter 5 accorded SPD status have been reduced to include only Sections 5.33 and 5.39;
- Paragraph 5.9 - reference to ongoing evaluation of the policy.
- Paragraph 5.10 - that when calculating affordable housing provision the number of units will be rounded to the nearest whole number.
- Paragraph 5.11 – change to wording so that it is not implied that the Council is requiring 5% social housing and 15% intermediate.
- Paragraph 5.11 - the proportion of intermediate/social rented housing may vary on each site.
- Paragraph 5.16 - reference to new appendix which defines the eligibility criteria for social rented and intermediate housing.
- Paragraph 5.32 - to clarify that the preferred dwelling size mix does not preclude 1 bedroom intermediate housing provision where there is an insufficient supply.
- Paragraph 5.40 and 5.63 - to use the wording "financial appraisal" rather than an "open book approach"
- Paragraph 5.45 - to clarify that affordable housing for sale should be aimed at residents earning less than median incomes.
- Paragraph 5.56 – the “high proportion of socially rented housing” in an area has been defined as 35% rather than 60%.
- Paragraph 5.56 - wording added to clarify that the "important planning or regeneration objectives" referred to are those which are included in Strategic Regeneration Frameworks, planning frameworks or other Council approved programmes.
- Paragraph 5.61 - affordable housing and other planning related requirements will be negotiated as one coherent package;
- Additional research is underway to take on board the general concerns expressed by some developers regarding the financial viability and implications of the document.

- Appendix D - a new appendix defining eligibility criteria for access to affordable housing.