

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

STATEMENT OF CONSULTATION

1. INTRODUCTION

- 1.1 The Affordable Housing Supplementary Planning Document (SPD) has been prepared to expand upon and clarify the Council's requirements in respect of the provision of affordable housing in new housing developments. It seeks to expand upon and provide detail to existing planning policy in this subject area, specifically policy H/7 of the Unitary Development Plan. The SPD sets what level of provision we would expect in new developments which meet the threshold, what the cost to the developers will be and under what circumstances it would be acceptable for developers to make a financial contribution to off-site provision.
- 1.2 In order to ensure that appropriate public consultation takes place, SPDs are required to be accompanied by a statement setting out how the Local Planning Authority will comply with the Council's Statement of Community Involvement (SCI). This document details the public consultation that will take place to meet these requirements.
- 1.3 The new planning system introduced during 2004 includes new requirements (e.g. community involvement and the need to undertake a Sustainability Appraisal) governing the preparation of SPDs which replace the old style Supplementary Planning Guidance documents (SPG). Whilst not having 'development plan' status, SPDs will be afforded greater weight in the development control process than SPGs.
- 1.4 This document sets out the public participation procedures to be undertaken by the Council for the Affordable Housing SPD. It accords with regulation 17 of the Town and Country Planning (Local Development) (England regulations 2004).
- 1.5 Using the guidelines of the new government regulations and PPS 12, the public consultation draft SPD has been prepared through a process of consultation.

2. FRONTLOADED CONSULTATION CARRIED OUT IN DEVELOPING THE SPD

- 2.1 Officers from the strategic planning team and the Strategic Housing service worked together to consider the scope and content of the SPD. Following this a procedure of early consultation was undertaken which included;
 - An early draft of the SPD which included a series of questions relating to the main issues was distributed to a number of officers in the Council, specifically those whose work relates to the issues under discussion.
 - This initial draft document was then refined following comments received and was then distributed more widely on 21st September 2007, to all members of the Council as well as external bodies such as housebuilders and housing associations and other key stakeholders. Those consulted were given until the 22nd October 2007 to make comments on this first

draft. The letter also included an invitation to an informal discussion event to discuss the issues relating to this SPD.

- A discussion event for members was held on Thursday 3rd October 2007 which consisted of an introductory presentation followed by an open discussion focusing on the key question in respect of the proposed document. This meeting was attended by twelve members.
- A discussion event for housebuilders, housing associations, relevant council officers and other key stakeholders was held on Thursday 11th October 2007. This was attended by 14 people including 5 housebuilders/agents and 2 housing associations.

2.2 It was felt that both of these events were very useful in providing feedback on the draft SPD. These activities helped to identify the format and content of the draft SPD.

3. THE SUSTAINABILITY APPRAISAL (SA) PROCESS

3.1 The first part of the SA process involved collecting background information for inclusion in the Scoping Report which enabled the scope of the SA to be determined. It was also a consultation document which allowed organisations and individuals to comment on the proposed scope of the SA. Consultation responses received helped to ensure that the draft SA was comprehensive and robust enough to support the SPD during later stages of full public consultation and examination.

3.2 Paper copies of the draft Scoping Report were sent out on the 14th August 2007 and recipients given a period of five weeks, until 18th September, to make comments. Government requires that three specific bodies (as required by the Strategic Environmental Assessment Directive) were consulted at this stage – Natural England, English Heritage and the Environment Agency. Although not statutorily required, the following bodies were also consulted:

- Government Office for the North West
- The North West Regional Assembly
- Greater Manchester Ecology Unit
- Greater Manchester Chamber of Commerce
- Rochdale Civic Society
- Rochdale Local Strategic Partnership
- Home Builders Federation

3.3 Consultation responses have been received, recorded and incorporated into the Scoping Report as required. A draft SA has been completed for this SPD and will be subject to public consultation as part of the SPD consultation exercise commencing on 17th December 2007.

4. DETAILS OF PUBLIC CONSULTATION PROCESS

4.1 In accordance with the Council's Statement of Community Involvement, public consultation included direct notification to consultees, key local stakeholders and other interested parties. Publicity was also provided through the local press.

- 4.2 On publication of the draft SPD a public consultation exercise was undertaken to raise awareness and interest. In accordance with Regulation 17, a public notice was published in a local newspaper which clearly states the duration of the public consultation period and the places and times at which the SPD could be inspected.
- 4.3 Public consultation commenced on 17th December and ended on 28th January 2008. The following consultation methods were used:
- The draft SPD was made available on the Council's website Rochdale.gov.uk/council and democracy/consultations.aspx. Comments could be made online via the online comments form;
 - Hard copies of documents were made available for inspection at Council offices and libraries as detailed in Appendix 1;
 - Letters were sent to all parties Rochdale Council considers to have an interest in the SPD including statutory consultees, general consultees, local voluntary and community interests. The letter will include details of the role of the SPD and how and where to view the draft SPD and associated documents including the draft SA and make comment;
 - A public notice will be placed in the Rochdale Observer, Heywood Advertiser and Middleton Guardian newspapers. A press release was also issued prior to commencement of public consultation.
 - Paper or electronic copies of the SPD or associated documents were made available on request (see contact details below).
 - A facility for those who wished to view the documents in large print or in Braille or for translation into Bengali or Urdu was available on request.

5. RESPONSE TO CONSULTATION

- 5.1 A total of 19 bodies or individuals responded to the consultation on the draft document. The comments received covered a variety of issues, as can be seen in the schedule in Appendix 2; particular issues which came up several times related to the evidence base of the SPD, how viability of schemes would be assessed, how the proportion of affordable housing and the discount is to be applied, more information regarding the types of affordable housing required and the 'pepper potting' of affordable housing across sites. The schedule in Appendix 1 also shows the changes to the documents proposed as a result of the comments received. The proposed changes include:
- Amend objectives to take account of mixed and sustainable communities.
 - Make reference to the monitoring of any new information to see if a review of the approach is required in light of new evidence.
 - Make reference to the fact that PPS3 Housing is now a material consideration in relation to the threshold being proposed.
 - Give more clarification on the type and tenure of affordable housing required as identified within the Housing Needs Study.
 - Make it explicit that the contribution to affordable housing will never exceed the 7.5% of Gross Development Value (GDV) of the scheme.
 - Further clarification on how the 15% provision as 50% discount has been arrived at and indicate that although this is set out as the 'average'

requirement there is flexibility within this to achieve either higher levels of provision or discount but within the 7.5% GDV maximum.

- Explanation of how the flexibility within this approach will enable us to obtain the most appropriate type and mix of affordable housing on a particular site
- Clarification on how the approach to affordable housing means that the requirement is known early in the planning process and can therefore be considered at outline stage.
- Removal of the reference to a specific developer profit

5.2 Changes to the layout / editorial changes, none of which alter the fundamental elements of the document, have also been made to improve clarity / readability of the document. Copies of the amended SPD and the Consultation Statement will be placed in the group rooms prior to the Cabinet meeting.

ADVICE AND ASSISTANCE

For further advice or information relating to this document please contact:

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Website: www.rochdale.gov.uk/council_and_democracy/consultations.aspx

APPENDIX 1 - VENUES FOR PUBLIC INSPECTION OF AFFORDABLE HOUSING SPD

Council Information Points:

Planning and Regulation Reception, Floor 1, Telegraph House, Rochdale
Rochdale Information Centre, Floor 2, Municipal Offices, Smith Street, Rochdale
Heywood Information Centre, 44-46 Market Street, Heywood
Middleton Information Centre, Sadler Street, Middleton
Milnrow Information Centre, 82 Dale Street, Milnrow
Littleborough Information Centre, Council Offices, Harehill Park, Littleborough
Kirkholt Information Centre, 46, The Strand, Kirkholt, Rochdale.

Libraries

Wheatsheaf Library, Baillie Street, Rochdale
Balderstone Library, Balderstone Park, Rochdale
Belfield Library, Belfield Community School, Samson Street, Rochdale
Castleton Library, 881 Manchester Road, Rochdale
Smallbridge Library, Stevenson Square, Rochdale
Spotland Library, Ings Lane, Rochdale

Heywood Library, Church Street, Heywood
Darnhill Library, Argyle Parade, Heywood
Norden Library, Edenfield Road, Rochdale

Middleton Library, Long Street, Middleton
Alkrington Library, Kirkway
Langley Library, Windermere Road, Middleton

Littleborough Library, Hare Hill Park, Littleborough
Milnrow Library, Newhey Road, Milnrow
Smithybridge Library, 121/3 Smithybridge Road, Littleborough
Wardle Library, 448 Birch Road, Wardle, Rochdale

APPENDIX 2 - SCHEDULE OF COMMENTS AND PROPOSED CHANGES TO SPD

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
1.	Highways Agency	<ul style="list-style-type: none"> Satisfied with content of the document 	<ul style="list-style-type: none"> noted 	<ul style="list-style-type: none"> No change required
2.	HBF	<ul style="list-style-type: none"> <u>5. Evidence of Local Need:</u> As the SPD is based on a Housing Needs Study and not a Strategic Housing Market Assessment then the evidence which underpins it has not been subject to stakeholder consultation. This questions the soundness of the evidence base. In this case the evidence base would be a SHMA carried out in accordance with the good practice guidance and with the outputs and consultation set out in PPS3. The SHMA is particularly important since the delivery of affordable housing is dependant on the delivery of market housing. <u>10. Design Considerations:</u> Although the principles of integrating affordable housing and ensuring that any provision is tenure blind are supported, the HBF have concerns about true 'pepper potting' of properties. They suggest that affordable housing should be provided in small clusters, particularly as this is often easier for RSL management purposes and tailoring service charges. 	<ul style="list-style-type: none"> It is recognised that since work commenced on the Housing Needs Study update the requirement to undertake a SHMA has come out. Joint work by all GM districts has now commenced on the production of SHMA's. However, the Council was committed to produce an SPD within policy H/7 of the UDP. Since it is likely to be some time before any information from these could be used this would further delay the SPD. The information from the HNS is considered to be robust and is up to date and is likely to form the basis of any subsequent HMA work. Whilst the HBF state that the SPD should be based on a SHMA they do not indicate what action should be taken in relation to this SPD. We are aware that sometimes true 'pepper potting' is not appropriate. The cluster approach may often be the most suitable approach although we would be guided in these cases by the RSL. The aim of the guidance is to satisfy national objectives in terms of mixed and sustainable communities whilst ensuring practicability of delivery and management 	<ul style="list-style-type: none"> The issue of the SHMA is noted. The Council will consider all new evidence as it comes to light to see if it would require a review of existing guidance. It should be noted that some of the recommendations from the HMA methodology were incorporated within the Housing Needs Study. This will be made clearer in Section 5 of the SPD. The guidance does say 'may' require 'pepper potting'. However, following other comments the 'may' is to be replaced with '<i>would normally</i>'. The last sentence of para. 10.1 is to be replaced with the following '<i>The precise nature of the integration of the affordable housing into the scheme will be agreed between the Council and the developer based on site specific circumstances</i>'. This would not preclude a cluster approach if

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
				deemed more appropriate. What the guidance is keen to avoid is a concentration of affordable housing in one part of the site unless this is agreed to be the only practicable way forward.
3.	Natural England	<ul style="list-style-type: none"> No comments 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> No response required
4.	HOW Planning LLP	<ul style="list-style-type: none"> <u>Viability:</u> SPD should recognise that many sites in the Borough have an industrial legacy and therefore require significant decontamination and remediation. Planning policy requirements are not always evident due different SPG's/ SPD's and therefore difficult to assess full cost implications. Suggest that to make costs clear the LDF should contain a bespoke SPD to cover all developer contributions. Given the costs of studies to assess issues such as contamination and flood risk it is sometimes difficult to quantify these up from and therefore flexibility should be included in SPD in this regard. 	<ul style="list-style-type: none"> It is accepted that many sites in the Borough have an industrial legacy. However the purpose of this section of the SPD is for developers to take issues such as this into account as far as possible when considering individual sites. The purpose of this SPD is to provide clarity in relation to requirement for affordable housing. There other SPD's that cover other requirements and these will all be made available on the web site. The SPD seeks to set out in simple terms what is required. The SPD accepts that there are costs involved in developed and calculating them exactly is challenging. However, whilst it is not helpful to set out a list of exceptions within the document, where developers can demonstrate that there were difficulties in assessing exact costs at the time of purchase this will be taken into account. Para 6.8 specifically states that developers may submit evidence of 	<ul style="list-style-type: none"> No change required No change required. Outside the scope of this SPD. No change required. Reference of such issues already made under para. 6.8.

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		<ul style="list-style-type: none"> • Given the timescales involved with site acquisition it is important the local authority either have a policy mechanism or a dedicated officer to deal with such enquiries promptly. • <u>Scale of Affordable Housing:</u> • Refer to the HNS statement that a target of up to 40% of affordable housing could be justified on sites and claim that such a target would be a serious constraint to development. • The lack of a Strategic Housing Market Assessment (SHMA) means that the scale of affordable housing suggested in the draft consultation document is based on an out of date and inadequate assessment of the needs of the Borough. 	<p>those matters which were not ascertainable prior to purchase.</p> <ul style="list-style-type: none"> • The Council is positive in dealing with enquiries and getting involved in pre-application discussions. Additional staff to deal specifically with planning obligations, including affordable housing, would be beneficial but would be dependent on resources. • The reference to the larger target which the Housing Needs Study states could be justified is placed there to indicate the scale of affordable housing need within the Borough and to support the considerably lower requirement (in terms of proportion) set within the SPD. The reason that a figure considerably lower than the 40% has been chosen reflects the need to take account of deliverability • It is recognised that since work commenced on the Housing Needs Study update the requirement to undertake a SHMA has come out. Joint work by all GM districts has now commenced on the production of SHMA's. However, the Council was committed to produce an SPD within policy H/7 of the UDP. Since it is likely to be some time before any information from these could be used this would 	<ul style="list-style-type: none"> • No change required. Outside the scope of the SPD in that it is more of an implementation issue. • No change required. • No change required at this stage. The SPD may need to be reviewed to take account of a SHMA if this indicates that the approach needs to be updated. However, at present the SPD is based on the most up to date information on housing need available.

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<ul style="list-style-type: none"> • The requirement of a discount of 50% to be applied to the 15% affordable housing requirement is in effect beyond the realms of what is quantified to be affordable housing in PPS3 • It is suggested that a SHMA is undertaken at the earliest opportunity in order that the emerging SPD is robust and sound. This would ensure that the scale of affordable housing could be set out based on robust evidence therefore providing market certainty. This also applies to guiding appropriate type and mix. 	<p>further delay the SPD. The information from the HNS is considered to be robust and is up to date and is likely to form the basis of any subsequent HMA work.</p> <ul style="list-style-type: none"> • There does not appear to be any reference within PPS3 that stipulates what the appropriate levels of developer contribution should be in relation to affordable housing. The SPD does go on to say that this generally requirement may be more flexibly applied which may result in a higher proportion at a lower discount. This figure was arrived at as the 50% contribution falls somewhere between the minimum and maximum contributions required and therefore provides a better guide of what is most likely to be the appropriate level on individual sites. • It is recognised that since work commenced on the Housing Needs Study update the requirement to undertake a SHMA has come out. Joint work by all GM districts has now commenced on the production of SHMA's. However, the Council was committed to produce an SPD within policy H/7 of the UDP. Since it is likely to be some time before any information from these could be used this would further delay the SPD. The information from the HNS is considered to be robust and is up to date and is likely to form the 	<ul style="list-style-type: none"> • No change required. • No change required at this stage. The SPD may need to be reviewed to take account of a SHMA if this indicates that the approach needs to be updated. However, at present the SPD is based on the most up to date information on housing need available.

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		<ul style="list-style-type: none"> • <u>Mechanisms and Types</u> • State that by definition discounted market housing is not a type of affordable housing. PPS3 states that affordable housing is that which meets housing need not met by the market i.e. with subsidy, whereas discounted market housing is provided without subsidy. Therefore this issue should be reassessed prior to the further development of the SPD. 	<p>basis of any subsequent HMA work. The HNS does provide information on the type and size of affordable housing required.</p> <ul style="list-style-type: none"> • It appears from the description that there is some confusion here between Discounted Market Housing referred to in the SPD and Low Cost Market Housing. It is accepted that Low Cost Market Housing. This is why there is no reference to low Cost Market Housing within this section of the document. 	<ul style="list-style-type: none"> • No change required
5.	Atisreal on behalf of FKI plc)	<ul style="list-style-type: none"> • Make reference to their client's landholding at Manchester Rd, Castleton. • FKI note the figure of 15% affordable housing provision on all residential sites and the flexible provision mechanism set out seeking a 7.5% contribution in terms of total scheme value. The use of a headline figure is welcomed and supported as it as it provides landowners and developers with a level of certainty over the contribution to AH and this along with the flexible approach should be retained in the SPD. • However, it is considered that 15% provision and a 7.5% contribution should be a maximum and therefore supports the Council's stance of taking a lower figure than the possible target of up to 40% put forward in the HNS 	<ul style="list-style-type: none"> • Noted • Support of this approach is noted and will be retained within SPD. • The 7.5% GDV is a maximum and it may be appropriate to make this clearer within the document. In terms of a proportion the 15% is not a maximum since if the discount required to make the properties affordable is lower than 50% then more properties can be made affordable whilst staying within the 7.5% GDV maximum. Examples of this 	<ul style="list-style-type: none"> • No change required. • No change required. • Insert text within appropriate section of the SPD to make it explicit that the 7.5% contribution is a maximum. Also make reference to the fact that para 7.6 outlines examples of flexibility within this approach in order to obtain the most appropriate type and mix of affordable housing on a

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<ul style="list-style-type: none"> Given the costs of redeveloping PDL sites, the adoption of a target approaching the 40% would have a significant impact of the delivery of such sites and consequently regeneration within the Borough. <u>On-site provision / off-site contributions</u> Support the flexibility regarding the potential for off-site contributions where there are good planning and housing need reasons. Therefore SPD should not set out a rigid requirement for on-site affordable housing provision. This would in some cases enable other beneficial ways of providing affordable housing e.g. through refurbishment of empty homes. 	<p>flexibility are given in paragraph 7.6 of the SPD.</p> <ul style="list-style-type: none"> Agreed. This is why the average target has been set at 15% assuming the 50% discount. The preferred option will always be for on-site provision. However, if the type of properties on a site does not match local need or the number of units on a small site is very low then in exceptional circumstances an off-site contribution may be more appropriate. 	<p>particular site.</p> <ul style="list-style-type: none"> No change required. No change required.
6.	Nathaniel Lichfield and Partners (on behalf of Hopwood hall College)	<ul style="list-style-type: none"> SPD should be consistent with the policy in the UDP. Policy H/7 sets out the threshold of 25 or more dwellings for when affordable housing will be required and therefore lowering the threshold conflicts with advice within PPS12 which states that SPD's should not seek to alter Development Plan policy. Object to paragraph 6.3 of the Affordable Housing SPD which states that the gross number of proposed dwellings will be used when considering whether a development meets the threshold for provision of affordable housing. This proposal has no policy basis and is 	<ul style="list-style-type: none"> PPS sets an indicative threshold of 15 dwellings for when affordable housing should be sought. Informal advice from Government Office for the NW stated that authorities could use the lower threshold given that PPS3 was a material consideration. The Council, along with some other authorities in GM, have been applying the 15 dwelling threshold following the publication of PPS3 and this view from GONW The Council has to have regard to the loss of units as this increases demand for new housing including affordable housing. There are many examples within the Borough of clearance sites where gross units have been used to 	<ul style="list-style-type: none"> Need to make it explicit that that PPS is a material consideration and therefore justifies the change in threshold set out in this SPD and which has been applied in the Borough since the publication of PPS3. No change required.

	Respondent	Comment	Response	Recommendation/Change <i>(proposed new text in italics)</i>
		<p>considered unreasonable as it would act as a disincentive for developers to redevelop existing sites or provide higher density development.</p> <ul style="list-style-type: none"> • Generally support the Council's proposed approach to provision but request greater clarity in terms of the calculation. Document states that this figure refers to an assumption that 15% of the dwellings will be calculated at 50% of the discount price, but provides no evidence for this reasoning 	<p>subsequently deliver affordable housing e.g. Langley. It is sometimes more important to consider affordable housing in areas where there is clearance as often it has been clearance of social housing or is in areas where deprivation means that access to market housing is limited.</p> <ul style="list-style-type: none"> • This figure was arrived at as the 50% contribution falls somewhere between the minimum and maximum contributions required in order to make the Affordable Housing provision genuinely affordable. There is often a discount of around 60-70% required to make rent work whereas shared ownership and discounted market housing may be achieved with a 30-40% discount. Therefore assuming an average of 50% enables the relatively modest requirement of 15% to be achieved in most cases. 	<ul style="list-style-type: none"> • Expand para 7.3 to further explain this general requirement but also emphasise the flexibility within it through reference to para 7.6.
7.	United Utilities	<ul style="list-style-type: none"> • Make comments in relation to Section 10. Design Considerations. They support the statement that quality and material specifications should not be to a lower standard. • Also make reference to sustainability issues such as water saving devices and sustainable drainage 	<ul style="list-style-type: none"> • Support is noted • Whilst the importance of this is recognised the focus of this SPD is affordable housing and the reference to design is aimed to ensure the same quality of property. Issues in relation to those raised are covered top some 	<ul style="list-style-type: none"> • No change required. • No change required. Issues covered within other SPD's.

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			extent in the Urban Design Guide SPD and the draft Energy and New Development SPD.	
8.	HMR Core Team	<ul style="list-style-type: none"> The section dealing with aims and objectives should be more aspirational and tie in with the mixed and sustainable communities agenda and the need for high quality design. Perhaps a need for the SPD to indicate how need in the Housing Needs Study translates into the type of affordable housing required. In para 6.2 should note that PPS3 is now a material consideration and that the Council will give the document and its policy on affordable housing significant weight. In relation to the factors which may impact on the cost of delivering a scheme, comment is made that there is a danger that developers/applicants may see the lists as indicative of the type of costs that could be 	<ul style="list-style-type: none"> It would be appropriate to amend / expand on the aim / objectives to include the sustainable communities element. The objective of high quality design is not a principle focus of this SPD and is covered more comprehensively within other SPD's. This section was purposely left brief as much of the information is contained within the Housing Needs Study. Given comments from others on this matter there could be some text added to clarify this. However, it is inappropriate to be too rigid regarding the type as this would affect the document if local circumstances changed in the light of new evidence. Agreed. Reference to PPS3 as a material consideration would be useful in explaining change to threshold. The lists are there to illustrate to applicants / developers the type of costs we would expect them to consider and take account of in respect of individual schemes. It would be hoped that they 	<ul style="list-style-type: none"> Amend the aim to read <i>'To provide for the affordable housing needs of the Borough as part of creating mixed and balanced communities'</i>. Add to end of Objective 2 <i>'...as identified within the Housing Needs Study'</i>.. Briefly add to this section (para 5.2) to include what the HNS study suggests in relation to the type of affordable housing required. Need to make it explicit in para. 6.2 that that PPS is a material consideration and therefore justifies the change in threshold set out in this SPD and which has been applied in the Borough since the publication of PPS3. Make the following change to clarify that the lists relate to assumed identifiable costs. Change penultimate sentence of para. 6.6 to read <i>'The table below</i>

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		<p>discounted from any requirement. Also may need more explanation of how information on viability will be assessed.</p> <ul style="list-style-type: none"> In relation to developer profit the reference to 15% is not required. Should simply refer to reasonable developer profit. Within para 7.3 should make cross reference to the paragraph in the document which relates to the requirement for Housing Market Renewal projects Need to explain further how the 15% at 50% figure is arrived at. Would assume that the figure for the proportion of affordable housing could be higher if the discount is reduced. From a HMR perspective there is a wish to maximise the amount of affordable housing delivered through the planning system and therefore would wish to understand how the 15% achieves this goal. Within para 7.3 the Council could explain further about the type of affordable housing required and the priority given to each in the negotiation process. 	<p>are not used to discount any requirement. The explanation on how it will be assessed appears to be sufficient.</p> <ul style="list-style-type: none"> Agreed. Comments elsewhere suggest reference to a specific figure is not appropriate. Agreed would be helpful to insert reference This figure was arrived at as the 50% contribution falls somewhere between the minimum and maximum contributions required in order to make the Affordable Housing provision genuinely affordable. There is often a discount of around 60-70% required to make rent work whereas shared ownership and discounted market housing may be achieved with a 30-40% discount. Therefore assuming an average of 50% enables the relatively modest requirement of 15% to be achieved in most cases. The aim of the SPD was to be simplistic in terms of specifying type as the need may vary from site to site. Also the requirement may change so maintaining flexibility is seen as the preferred option. However there may be some merit in expanding on the information from the HNS in terms of need. 	<p><i>shows those factors which may apply to any particular site'. Give table the heading 'Assumed Identifiable Costs'.</i></p> <ul style="list-style-type: none"> Delete reference to the 15% figure. Simply refer to <i>'reasonable developer profit.</i> In para 7.3 after '...all sites within the Borough.' <i>Insert '(see para 7.10 for target within HMR projects)'</i> Expand para 7.3 to further explain this general requirement but also emphasise the flexibility within it through reference to para 7.6. No change. But as noted above briefly add to this section (para 5.2) to include what the HNS study suggests in relation to the type of affordable housing required.

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		<ul style="list-style-type: none"> Is it possible to explain further how the formulae in Figure 2 originated? In para 7.4 it may be useful to give an indication of the general needs in the Borough and priorities. Considering the above comments on about mechanisms and priorities, para 8.1 should be stronger in seeking preferred accommodation. Section on Design needs to explain why high quality and street level mixing is important e.g. to achieve mixed and sustainable communities. 'Pepper potting' should be a requirement not an option (although it is accepted that in some cases such as apartment development this may not be an option) as this is a key principle of HMR policy. 	<ul style="list-style-type: none"> This is based on the need to achieve a realistic proportion of affordable uses and is based on based experience. The document does go on to say that this will be flexibly applied but is expressed in these terms to give developers a clear steer on was providing affordable housing will mean in relation to scheme costs. This is covered in the HNS update and not sure how useful it is to replicate that information here. See comments above. May expand some parts of SPD to cover this. This section is simply to ensure that affordable housing is indistinguishable from market housing. I think stating why this is important is perhaps a bit unnecessary. The 'pepper potting' issue is difficult as although it is advocated in terms of sustainable communities, there are sometimes practical reasons as to why a degree of grouping is appropriate e.g. for more effective management. 	<ul style="list-style-type: none"> Expand para 7.3 to further explain this general requirement but also emphasise the flexibility within it through reference to para 7.6. As noted above briefly add to this section (para 5.2) to include what the HNS study suggests in relation to the type of affordable housing required. See above recommendation. The guidance does say 'may' require 'pepper potting'. However, is perhaps clearer to replace 'may' with '<i>would normally</i>'. The last sentence of para. 10.1 is to be replaced with the following '<i>The precise nature of the integration of the affordable housing into the scheme will be agreed between the Council and the developer based on site specific circumstances</i>'. .
9.	The Theatres Trust	<ul style="list-style-type: none"> Have no comment to make but look forward to being consulted on other LDF documents 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> No change required

	Respondent	Comment	Response	Recommendation/Change (<i>proposed new text in italics</i>)
10.	Mosaic Town Planning (on behalf of the Casey Group)	<ul style="list-style-type: none"> Note that it does not explain the approach that will be taken in relation to an outline application in which the number and type of dwellings may not be known. We would suggest that this be clarified in the final version. 	<ul style="list-style-type: none"> This is why the SPD is set out in a way which indicates the cost to the developer before any details of types, sizes and prices is known. 	<ul style="list-style-type: none"> No change required. The way that the requirement is set out within the SPD means that it should be taken into account at pre-application and outline application stage.
11.	Colliers CRE (on behalf of Russell Homes)	<ul style="list-style-type: none"> Agree with the principle of affordable housing for those unable to access market housing. However, concerned that, as it stands, the document is essentially a development tax to be applied to all residential developments above 15 dwellings. Whilst the indicative minimum size threshold of 15 dwellings set out in PPS3 is generally accepted and this should be a starting point. However feel that the fact that this is a starting point should be expressed more clearly within the document with some comment on the flexibility of that threshold <u>Viability</u> Believe that the 15% profit on GDV set out in paragraph 6.9 is too low. A profit margin of 20% would be more appropriate in the context of the current housing market The blanket application of 15% provision of affordable housing as set out in para 7.3 is 	<ul style="list-style-type: none"> The way of expressing the requirement as a percentage of the GDV seems to be the best way of indicating to developers early on the costs of affordable housing provision. Informal feedback from the draft SPD suggested that developers preferred a boroughwide approach which could be quantified and therefore provided some certainty. However, the SPD does allow flexibility in terms of the requirements of individual sites. I do not think it is appropriate to have flexibility in the threshold as this is very difficult to justify. The SPD does take account of viability and therefore better to vary the requirement based on a thorough assessment of viability than change the threshold on an ad hoc basis. Given other comments and the large variation between the margins different developers appear to work to it appears more appropriate to just refer to reasonable profit. The SPD sets out the requirement as a percentage of the GDV. The formula 	<ul style="list-style-type: none"> No change required. No change required. Delete reference to the 15% figure. Simply refer to 'reasonable developer profit. No change required.

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		<p>inequitable. For example commercial viability may vary from one area to another. Instead requirements should be considered on a site by site basis, based on an assessment of local need</p> <ul style="list-style-type: none"> • The table at 6.6 is too onerous as many of the costs will not have been identified from the outset especially given the complexity of some Brownfield sites and the speculative nature of development. • The requirement set out in para 6.9 to submit evidence of non-viability is accepted and agreed with. However, the provision of financial evidence on an open book basis would only be acceptable, for reasons of commercial sensitivity, where that information will be used for internal purposes only. • <u>Approach</u> • Section 5 of the SPD set out the need for affordable housing given the rise in house prices in recent years. Whilst this is accepted the 	<p>used uses a 15% at 50% discount as this seems the average required to make it work but the SPD does go on to explain that there is flexibility within this but always with the maximum 7.5% GDV contribution. If it is based on a % GDV then the relative values of different sites would be reflected in the contribution. Dealing with it on a site by site basis without indicating the requirement would mean that developers were unable to take account of the likely requirement when negotiating the purchase of a site.</p> <ul style="list-style-type: none"> • The table gives a list of development costs that may have to be taken into account on specific sites. It is intended to be comprehensive as its purpose is to ensure that developers consider potential costs as far as possible. It does not mean that all these costs will apply to a particular site. • Any information provided would be treated confidentially. • Whilst it is accepted that there has been some stabilisation of house prices in recent months there is still significant 	<ul style="list-style-type: none"> • No change required. • Add to para 6.8 '<i>...but confidentiality of commercially sensitive information will be ensured.</i>' • No change required.

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		<p>document does not allow for any flexibility should house prices fall and clearly this is inequitable</p> <ul style="list-style-type: none"> • Developers are increasingly providing affordable housing themselves and this fact needs to be reflected in the document. 	<p>affordability issues. Although a significant fall in housing prices is unlikely, since the calculation is based on a percentage of the GDV this is therefore linked to house prices so could take account of increases and decreases.</p> <ul style="list-style-type: none"> • This is reflected in the section on mechanisms. 	<ul style="list-style-type: none"> • No change required.
12.	Knight Frank LLP (on behalf of MMC Development Ltd)	<ul style="list-style-type: none"> • The 15 dwelling threshold is set out in PPS 3. However there may be circumstances when a higher threshold should be considered e.g. where the constraints of the site mean that the scheme would only be viable based on a higher threshold • Do not fully agree with the method which the Council suggests for dealing with viability. In particular it is unreasonable to anticipate that the full range of costs can always be identified at the point of acquiring the site e.g. on complex previously developed sites. Consideration must be afforded to those sites which have been purchased in advance of the SPD having taken effect. In these instances the amount of affordable housing should be adjusted to acknowledge previous guidance. • In terms of the scale and nature of affordable housing sought, comment that the guidance in paras 7.3 and 7.4 is too arbitrary as it set out a 15% requirement at a discount of 50% across 	<ul style="list-style-type: none"> • I do not think it is appropriate to have flexibility in the threshold as this is very difficult to justify. The SPD does take account of viability and therefore better to vary the requirement based on a thorough assessment of viability than change the threshold on an ad hoc basis. • This is acknowledged but the guidance is simply trying to ensure that developers consider as many potential costs as possible 'up front'. These means that these along with policy requirements can be fully costed into any scheme before the site is purchased. • The 7.5% set is a maximum and it is accepted that this needs to be made more explicit within the UDP. Para7.6 of the draft SPD does state that the 	<ul style="list-style-type: none"> • No change required. • No change required. • Insert text within appropriate section of the SPD to make it explicit that the 7.5% contribution is a maximum. Also make

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		<p>the Borough. The SPD also refers to the overall subsidy as being a 7.5% contribution. This requirement does not allow a mix of units to be provided. The guidance suggests that the mix of units should reflect local demand and therefore there may be instances where the mix provided results in a contribution greater than the 7.5% referred to. Therefore it is recommended that the 7.5% should be a maximum and the 15% should be adjusted to account for this. In some circumstances it will be appropriate for a higher discount to be provided on a lower number of units in order to attract investment into an area.</p> <ul style="list-style-type: none"> • In addition to the types of affordable housing consideration should also be given to the needs to deliver key worker housing. 	<p>proportion of affordable housing required may vary but the contribution will never be greater than 7.5%. This para does specifically give an example of where the requirement for a greater discount and here the proportion of affordable housing required is reduced accordingly (15% to 12.5% to achieve a 60% discount).</p> <ul style="list-style-type: none"> • Key worker housing is not currently a major issue in the Borough as some of the jobs classified under this term often have relatively high incomes when compared with many households within the Borough. However this will be monitored and may be acted on if becomes an issue. 	<p>reference to the fact that para 7.6 outlines examples of flexibility within this approach in order to obtain the most appropriate type and mix of affordable housing on a particular site.</p> <ul style="list-style-type: none"> • No change required.
13.	Northwest Regional Development Agency	<ul style="list-style-type: none"> • The document sets out a useful approach to the provision of affordable housing broadly in line with Government policy. The utilisation of a site threshold of 15 dwellings with an affordable housing element equivalent to 15% on-site capacity would seem acceptable, balancing the findings of the HNS update with market feasibility requirements. Also welcome the flexible approach in determining appropriate levels of house type and tenure mix. • Paragraph 3.2 refers to adoption of RSS by the end of 2007 but as yet the SoS modifications in 	<ul style="list-style-type: none"> • Noted • Change of expected adoption is noted and document will be amended 	<ul style="list-style-type: none"> • No change required. • Amend end of para 3.2 to refer to adoption date being Summer

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		response to the Panel report is still awaited.	accordingly	2008.
14.	Yorkshire Forward	<ul style="list-style-type: none"> No comments to make 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> No change required.
15.	North West Regional Assembly	<ul style="list-style-type: none"> Given the advanced stage that draft RSS is at, it should be given some consideration when assessing planning documents Para 3.2 states that draft RSS is likely to be adopted by the end of 2007 however it is now unlikely that it will be adopted before Summer 2008. Both adopted RSS policy UR9 and draft RSS policy L5 offer broad support for the approach taken by Rochdale to secure affordable housing. However can find no reference to how it will ensure that the affordable housing will remain affordable in perpetuity as suggested in draft policy L5 	<ul style="list-style-type: none"> Reference to draft RSS policy will be made. Change of expected adoption is noted and document will be amended accordingly Wherever possible the Council will look to ensure that affordable housing is affordable in perpetuity. However need to bear in mind Housing Corporation Requirements relating to 'right to acquire' if grant funding is put into a scheme. 	<ul style="list-style-type: none"> Amend para. 3.3 to make reference to relevant policy within RSS that deals with affordable housing. Amend end of para 3.2 to refer to adoption date being summer 2008. No change required.
16.	Government Office for the North West	<ul style="list-style-type: none"> Given that the SPD does not have the same status as a DPD suggest that suggest that document states that 15% affordable housing will be sought rather than required. Similarly in para.7.10 suggest that refer to a Pathfinder-wide target, rather than a requirement. 	<ul style="list-style-type: none"> The policy in the UDP does refer to affordable housing being required on those sites which meet the criteria set out under the policy. Since this covers issues such as viability it would seem appropriate to 'require' affordable housing through the SPD. Changing it to 'sought' would make it inconsistent with the policy on which the SPD is based. In this instance the word target is perhaps more appropriate given given that it is an aspirational target on HMR schemes 	<ul style="list-style-type: none"> No change required. Amend first sentence of para 7.10 to refer to '<i>Pathfinder-wide target</i>'
17.	Ron Smith	<ul style="list-style-type: none"> No comments 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> No change required.

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18.	Greater Manchester Police	<ul style="list-style-type: none"> Affordable housing should be designed and constructed to the standards of police accredited Secured by Design and the Council should encourage architects and developers to consult with GMP Architectural Liaison Unit early in the design process under section 10 – Design Considerations 	<ul style="list-style-type: none"> Whilst the importance of designing out crime is noted, the purpose of this section on design is to ensure that standards for affordable housing in terms of design quality are the same as for the 'market' housing within a scheme. The Council has recently adopted Urban Design Guides SPD which covers all aspects of design and these are referred to within this section. 	<ul style="list-style-type: none"> No change required.
19.	Disability Rights Commission	<ul style="list-style-type: none"> No comment as is not directly related to the work of the DRC. 	<ul style="list-style-type: none"> Notes 	<ul style="list-style-type: none"> No change required.