

## SCHEDULE OF RESPONSES AND THE COUNCIL'S RESPONSE - CONSULTATION DRAFT HOUSING SPD

### General Comments to SPD

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
General	Environment Agency (17)	Other	No further comments to make.	Response noted.	N/A
General	Countryside Agency (4)	Observations	The subject matter covered by the SPD is largely urban in nature and therefore unlikely to affect any of the Agency's interests. The Agency therefore do not wish to comment on the document.	Comments noted	None.
General	David Wilson Estates (19)	Support with conditions	Salford needs to offer a full range of house types and tenures as there is currently insufficient planning policy in place to prevent too many apartments and too few houses being constructed.  This has led to an imbalance in Salford's housing market. The intent of the SPD is therefore welcomed and supported.	Agree that Salford needs to offer a range of house types and tenures and note that David Wilson Estates support the draft SPD.	None.
General	Sport England (37)	Observations	Implication of providing more family accommodation and a better dwelling mix may be that greenfield sites which provide opportunity for sport and recreation may be needed to meet housing need (as a result of reduced densities).	The city council has a plentiful supply of previously developed sites that are suitable for housing development in accessible locations (as assessed through an Urban Potential Study), and a large number of dwellings with extant planning permission (11,242).  Sites for development of land will be brought forward in accordance with Policy ST11 of the UDP. This states that the first priority is for the re-use or conversion of existing buildings, whilst after that the priority is very	None.

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				<p>much on recycling previously developed land. Paragraph 4.40 of the UDP states that there is a substantial amount of previously developed land in Salford. Previously undeveloped sites will only be brought forward when it can be clearly demonstrated that there are insufficient sites available for development higher in the order in suitable locations. Paragraph 4.41 of the UDP states that "The release of previously developed land will be exceptional, requiring particular justification".</p> <p>It is not anticipated that there will be a shortage of previously developed sites as a result of policy in this document. Notwithstanding this, the development of recreation land or facilities is protected, unless it is shown that particular circumstances apply (UDP policy R1).</p>	
General	Sport England (454)	Object	A need exists for the SPD to be explicit about which sites would expect what type/ size of unit, for planning and financial contribution purposes.	<p>Disagree. Although the policies give a broad indication, the most appropriate mix of units will be partly dependant on individual site characteristics.</p> <p>However in response to representations to the draft, the approach to the preferred type and size / mix of units has been amended.</p>	<p>Amend the document to state that the "type, size and mix of affordable housing should be agreed in negotiation with the city council, having regard to the following factors:</p> <ul style="list-style-type: none"> <li>• The government objectives of securing mixed communities and greater diversity in the housing stock;</li> <li>• The existing supply of affordable housing within the local area;</li> <li>• The characteristics of the households in need of affordable housing; and</li> </ul>

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					<ul style="list-style-type: none"> <li>Local House Prices" (revised policy HOU4).</li> </ul>
General	Sport England (455)	Object	Developers need to be informed within the document, that as a consequence of increasing population levels and higher housing densities, a need will exist to contribute towards open space, sport and recreation provision.	Disagree that it is necessary to state that a need will exist for developers to make contributions towards open space, sport and recreation. The approach to open space and recreation associated provision as part of new developments is contained in policies R2 and H8 of the UDP. Further details are also set out in the draft Planning Obligations SPD, and the adopted Greenspace Strategy.	None.
General	Sport England (456)	Object	The implications of the draft SPD on the delivery of Council Services (beyond interests in housing), should be recognised. For example, Leisure Services may need to take account of the suggested planned housing mix, and how it will affect future needs/demands for the delivery of services and public facilities in the area.	The impact will depend primarily on the total volume of housing in the city and its associated areas, and this is an issue for the Core Strategy.	None.
General	Contour Housing (55)	Support	Generally support the SPD and would be happy to provide any other comments / support as required.	Comments noted.	None.
General	Morris Homes Limited (88)	Object	<p>Disappointed with the draft SPD and the policy stance taken. Cannot accept the proposed level of prescription in the SPD.</p> <p>The draft SPD's approach is completely unacceptable and represents a lack of understanding of the housing market with regards</p>	<p>Accept that the document is too prescriptive. Changes have therefore been made to made to it to make it less prescriptive, and provide greater flexibility to developers to take account of individual site circumstances.</p> <p>Disagree that the document</p>	<p>Make changes to the document to make it less prescriptive and therefore provide greater flexibility to developers.</p> <p>In particular, redraft policy HOU1 to remove the percentages (with regards to the minimum proportion of houses) from the policy. Additionally amend</p>

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			<p>to the delivery of appropriate housing. SPD is fundamentally flawed and ignores requirement for choice or purchasers aspirations needs.</p> <p>The dictation of house types by the public sector exposes housebuilders to an unacceptable commercial risk and may deter investment. Developers may also deter the release of land for development. As a result the SPD should take account of market considerations and the requirement for a degree of choice.</p>	<p>represents a lack of understanding of the housing market and that it ignores the requirements for choice and aspirational needs. The council have undertaken detailed analysis of housing and other socio-economic factors, with the production of the document partly arising out of a concern of the skewed nature of dwelling completions and those with extant permission.</p> <p>The objectives of the document are to "ensure that the mix of new housing helps to meet sustainable communities; and to ensure that the needs of all households are met". It is actually the intention of the document to ensure that the needs and aspirations of purchasers are met by "securing a broad mix in the type and size of dwellings in new developments, so as to provide diverse neighbourhoods and help attract more families to the city" (draft SPD, paragraph 3.2).</p> <p>The document should help to provide more certainty for developers and ensure consistency, which should help to ensure that investment is not deterred.</p>	<p>Policy HOU1 to clarify that alternative approaches may be permitted where it can be clearly demonstrated that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1. The reasoned justification to the revised policy has also been amended (paragraph 4.15) to make it clear that "it will be the responsibility of the applicant to demonstrate why the proposed mix of dwellings is appropriate, and how this is consistent with the policies of the UDP and this document".</p>
General	Morris Homes Limited (89)	Object	Cannot condone any policy document without having had any involvement in the production of the background information or associated HMA upon which the	Although Morris Homes did not have any specific involvement in the early stages of the production of the document, a number of consultation exercises were undertaken in order	None.

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			SPD is based.	<p>to raise awareness of the scope and role of the document, and seek the maximum contribution of ideas and options from other parties.</p> <p>The formal consultation stage allowed Morris Homes to influence the final document.</p> <p>The Consultation Statement which accompanied the consultation draft SPD set out in further detail the processes involved in producing the document.</p>	
General	Morris Homes Limited (478)	Object	It is questioned how Salford proposes to meet the draft RSS provision of 1600 per annum (effectively a 200% increase in its housing requirement) through the application of policies in the SPD.	The city council do not consider that the ability to meet the annual average requirement of 1600 dwellings per annum will be compromised by the policies in the document. The city has a plentiful supply of previously developed sites that are suitable for housing development in accessible locations, and the 1,600 dwellings per annum figure could be achieved, with the policies in the document, without any need to consider redevelopment of any significant employment areas or greenfield sites.	None.
General	Persimmon Homes (NW) (113)  Wilberton Properties (129)	Object	The SPD is effectively changing the overall housing policy within Salford, without that policy being 'tested' at Inquiry.	The city council do not agree that the document is effectively changing the overall housing approach without the policy being tested at Public Inquiry. However it is considered that in order to be fully consistent with Government Guidance on the scope of and	Amend the document to better explain the links between the policies in the UDP and those in the guidance.

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				<p>content of SPDs, it would be more appropriate to adopt the document as Planning Guidance.</p> <p>The guidance supports and expands on policies in the UDP (particularly H1, H4 and H7), in order to ensure that new development contributes to more balanced and sustainable communities. The guidance does not introduce a new policy approach.</p> <p>In order to further explain and enhance the links between the guidance and the saved policies, the council proposes to make significant changes to the document, and in particular make explicit links to criteria A-H of UDP Policy H1.</p>	
General	<p>Persimmon Homes (NW) (114)</p> <p>Wilberton Properties (130)</p>	Object	The SPD should be delayed until after the housing provision figure for Salford has been agreed through the RSS Review process.	<p>Disagree that it is premature to bring forward the document in the absence of an up to date RSS.</p> <p>Draft PPS3 is clear that that LPAs should set out the balance between household types to be provided for across the plan area (and the circumstances or broad locations in which this balance may be different), and to set out the need for and how an affordable housing requirement is to be met (paragraph 12).</p>	None.

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				Notwithstanding this, it is considered that no matter what Salford's final housing provision figure is, there is still a need to secure a better mix of dwellings, including the provision of affordable housing. Furthermore, the document is supplementing the UDP rather than the RSS.	
General	Persimmon Homes (NW) (115)  Wilberton Properties (131)	Object	The SPD is proposing to introduce a requirement for 'family housing' within new developments in Salford. However, there is no definition what constitutes 'family housing' neither does it relate to any policy in the UDP that defines or specifies family housing.	The document does not introduce a requirement for family housing, but it does supplement and seeks to implement the UDP objective of providing accommodation that will help to attract families to live in Salford. Its emphasis on securing a good mix of housing across the city will help to ensure that some accommodation suitable for families comes forward, rather than just the small apartments that currently dominate the supply of planning permissions.  There is no need to define 'family housing' as this is not a term used in the document, with it instead focussing on houses and apartments, and the size of them.	None.
HOU2/5/6	ASK Developments Ltd (226)	Object	Many of the provisions of HOU2, 5 and 6 are in direct conflict with the objectives/aspirations of the Greengate Framework and draft SPG and therefore exemption policies should be adopted where appropriate.	The principle of the policies is considered to be consistent with the Greengate Framework. However, it is recognised that the cumulative implications of possible planning obligations could affect scheme viability in some locations, and in such circumstances it may be appropriate to reduce or forgo the	Amend the affordable housing policies to explain that the affordable housing requirement may be reduced if the financial impact combined with other planning obligations could affect scheme viability.

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General	ASK Developments Ltd (227)	Object	<p>The policies should form part of the formal UDP/LDF process, and not through a Supplementary Planning Document. The SPD is bringing forward outside the LDF context new objectives of a highly prescriptive and detailed nature, which should properly be part of the statutorily prepared framework of development control policies. The SPD is potentially ultra vires</p> <p>Policies HOU2, 5 and 6 are ones which clearly set out criteria against which planning applications will be determined. As such they do not merely supplement the policies of the UDP, rather they supplement parts of these policies with entirely new considerations which find no resonance in the UDP.</p> <p>We would recommend that following the consultation period the Council reflects upon the detail and timing of the policies, and incorporates them into the Local Development Framework which provides a more robust consultation process, including if necessary, a public inquiry, into what represents a significant change in the housing policies for Salford.</p>	<p>affordable housing requirement.</p> <p>Supplementary Planning Documents are part of the LDF process, and the Housing SPD is identified in the council's LDS. Notwithstanding this, the city council consider that in order to comply fully with the requirements set out in PPS12 and the Regulations, it is most appropriate to provide advice in the form of Planning Guidance, as opposed to a SPD. Although this form of document does sit outside the LDF process, it is considered that reasonable weight can be attached to the document as it has been subject to widespread consultation and SA at all stages in its production.</p> <p>The guidance augments policies in the UDP (particularly H1, H4 and H7), and does not introduce a new policy approach. The council do however feel it is appropriate to make changes to further expand the links between the policies in the document and those in the UDP, and make the policies less prescriptive.</p>	Amend the document to be less prescriptive, provide greater flexibility to developers, and make clearer linkages to policies in the UDP.
General	ASK Developments Ltd (228)	Object	There is concern over the timing of the SPD. The proposals arise in the face of an up to date UDP and effectively contradicts it.	Disagree. The document does not contradict the UDP (see response to representation 227 above for further details). It amplifies specific	Amend the document to make better linkages to policies in the UDP.

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			<p>Given that the issues addressed relate to important issues of regional and sub regional housing supply any decisions about them need to be informed by the emerging Regional Spatial Strategy. In the absence of an up to date RSS forming part of the development plan, it is premature to bring forward changes in this way. The appropriate method is via the LDF process as a Development Plan document.</p>	<p>policies of the UDP.</p> <p>Disagree that it is premature to bring forward the document in the absence of an up to date RSS. The existing RSS was published in 2003, and the guidance is considered to be fully consistent with the draft RSS.</p> <p>Draft PPS3 is clear that LPAs should set out the balance between household types to be provided for across the plan area (and the circumstances or broad locations in which this balance may be different), and to set out the need for and how an affordable housing requirement is to be met (paragraph 12).</p> <p>Notwithstanding this, it is considered that no matter what Salford's final housing provision figure is, there is still a need to secure a better mix of dwellings, including the provision of affordable housing.</p>	
General	Salford Strategic Housing Partnership (248)	Support	The SPD will be key to achieving the city council's aim of ensuring that new housing provides wider choice and a better mix in the size, type, tenure and affordability of housing in Salford	Support noted.	None.
General	Highways Agency (278)	Observations	The Highways Agency is generally satisfied with the content of the document in its current form. We therefore have no representations	Observations noted.	None.

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General	McCarthy and Stone (279)  Peel Investments Ltd (382)	Object	to make on its content at this time. The level of detail in the SPD introduces new issues not identified within the UDP to which it relates. New issues such as the percentage, tenure, mix and design of affordable housing should be addressed through the production of a Development Plan Document.	Disagree. The council does not consider that the draft SPD is introducing new issues not identified in the UDP. However, the city council consider that in order to comply fully with the requirements set out in PPS12 and the Regulations, it is most appropriate to provide advice in the form of Planning Guidance, as opposed to a SPD.  Although Planning Guidance does sit inside the LDF process, it is considered that reasonable weight can be attached to the document as it has been subject to widespread consultation and SA at all stages in its production.  The guidance augments policies in the UDP (particularly H1, H4 and H7), and does not introduce a new policy approach. The council do however feel it is appropriate to make changes to further expand the links between the policies in the document and those in the UDP, and make the policies less prescriptive.	None.
General	McCarthy and Stone (280)  Peel Investments Ltd (383)	Object	The overriding issue that will be commented on in detail throughout this submission is the lack of new evidence to support the Council's new approach.	The city council do not agree that the document is based on a lack of evidence. Paragraph 2.21 of the draft SPD states that a detailed analysis of a comprehensive range of housing and other socio-	Amend the document to state that socio-economic and housing data analysis was undertaken by officers from the council's Housing and Planning Directorate at the beginning of 2006. Also state that the following

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			Such an evidence base should include a full housing market assessment, a detailed analysis of housing supply, urban capacity study, an assessment of the availability of grant funding, whether existing communities are mixed and balanced and what is needed to improve them, consideration of viability to include anticipated wider planning gain costs and particular site costs.	<p>economic data was undertaken, whilst housing market typologies were also developed to assess the health of the housing market in each of Salford's wards (paragraph 2.26). Other information used to inform the draft SPD is set out in paragraphs 2.9 to 2.35 of the draft, and in the reasoned justification to each policy. This evidence clearly identifies the need to secure a better mix of dwellings in terms of new developments, and a need for additional affordable housing.</p> <p>Although the council consider that the evidence base for the document is robust, it is felt that further information should be provided as to the nature of the socio-economic and housing data analysis referred to in paragraph 2.21.</p>	datasets were examined at the smallest area level: migration flows; self containment rates; household composition; house types; dwelling size; overcrowding; population change; population age; house prices; household income; house price to income ratio; tenure; council tax bandings; ethnicity; Index of Deprivation 2004; worklessness; benefit claim rates; dwelling vacancy rates; academic qualifications; and potential new dwelling distribution.
General	Government Office North West (354)	Object	<p>The concern we have with this draft SPD relates to the appropriateness of dealing with such housing matters solely through an SPD without a sufficiently clear relationship with the relevant DPD, in this instance Salford's UDP (i.e. SPD is not an appropriate vehicle for such policies as currently framed).</p> <p>We would urge you to review your UDP saved plan housing policies as a matter of urgency so that the issues covered in the draft SPD policies can be included in a DPD.</p>	<p>The council does not consider that the draft SPD is introducing new issues not identified in the UDP. The draft SPD augments policies in the UDP (particularly H1, H4 and H7), and does not introduce a new policy approach..</p> <p>The council does however feel it is appropriate to make changes to further explain and enhance the links to those policies in the UDP. These changes make more explicit the connections to criteria A-H of UDP Policy H1 (with the policies in the revised document explaining</p>	Amend the document to be less prescriptive, provide greater flexibility to developers, and make clearer linkages to policies in the UDP.

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				<p>how those criteria will be applied in certain circumstances, and that these are supplementing existing policies rather than introducing new ones).</p> <p>The policies on affordable housing have been simplified and made less prescriptive to ensure that they sit fully within the parameters set by UDP Policy H4.</p> <p>It is acknowledged that the policies on Lifetime Homes and redeveloping large homes could be considered to introduce some new policy, and therefore they have been deleted.</p> <p>Notwithstanding the above comments, the city council consider that in order to comply fully with the requirements set out in PPS12 and the Regulations, it is most appropriate to provide advice in the form of Planning Guidance, as opposed to a SPD. This guidance will carry reasonable weight as it is fully consistent with the UDP and has been subject to public consultation and SA at all stages.</p>	
General	GMPTE (372)	Observations	Developers should be asked to encourage future occupants to make use of public transport and offer incentives such as travel passes and information packs where new residential development	Agree in part that developers should be encouraged to provide travel passes and information on public transport in highly accessible locations. However it is considered that this is not an issue for this	None.

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			is located in areas that are highly accessible.	document. Policy A1 of the UDP states that "developers will be required to undertake or secure the implementation of any mitigation measures identified in a transport assessment, as well as other measures considered necessary to achieve an acceptable level of accessibility by public transport, cycling and walking, in accordance with Policy DEV 5 (Planning Conditions and Obligations)". The approach to Obligations is set out further in the draft Planning Obligations SPD.	
General	Peel Investments Ltd (381)	Object	The policy in the SPD should evolve through the Development Plan Process rather than by Supplementary Planning Document. In the absence of such adopted policy, individual development proposals should be considered on a 'case-by-case' basis.	See response to Government Office North West (representation number 354) above.	See proposed changes in response to Government Office North West (representation number 354) above.
General	David Wilson Estates (444)	Object	The scope of policy HOU1 and the SPD as a whole should be broadened to reflect the importance of linking development to effective and genuine master plans.	It is considered that the document particularly as amended, would be sufficiently flexible to take into account masterplanning processes. Masterplans can be a good way of ensuring compliance with the SPD across an area, and these are encouraged by the city council.	None.
General	North West Regional Development Agency (471)	Support	Support the approach of seeking to build sustainable communities and help attract more families to the city. In particular support policies HOU1, HOU2 and HOU3 as they are in line with RES.	Support Noted.	None.



## Chapter 1 - Introduction

Paragraph/ Policy	Respondent	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
General	Emerson Group (186)	Observations	Generally supports the city council's view that there is a need to attract families, although some of the proposed policies may be counterproductive in relation to overall regeneration within the city.	<p>Note general support for the intention of trying to attract more families to the city.</p> <p>Agree in part that some amendments to the policies would help to maximise the positive impact on regeneration within the city. Issues of viability have therefore been emphasised more in the final version of the document.</p>	<p>Make changes to the document to make it less prescriptive, and also recognise the potential impact on regeneration schemes.</p> <p>For example, amend policies concerning mix and type of dwellings by deleting the minimum percentages of housing. Additionally, alternative approaches in relation to the type and size of new dwellings may be permitted where it can be clearly demonstrated that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP policy H1. Criteria G and H of this policy relate to the Housing Market Renewal Initiative, and any other regeneration strategies approved by the city council.</p> <p>Amend affordable housing policies so that the 20% requirement may be reduced where there would be an impact on scheme viability (revised policy HOU3).</p>
Para 1.1	Bellway Homes (91)	Observations	<p>Guidance from Salford City Council in the form of this SPD is welcomed but the emphasis must remain on the word "guidance". The purpose of the document is to amplify adopted policy and must not introduce new policies</p> <p>The SPD has / will have no</p>	<p>Agree that the purpose of an SPD is to amplify adopted policy and should not introduce new policies.</p> <p>However, the city council consider that in order to comply fully with the requirements set out in PPS12 and the Regulations, it is most appropriate to provide advice in the</p>	Amend the SPD to clarify links between policies in the SPD and UDP.

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			development plan status, cannot be tested at public inquiry and whilst being a material consideration will have very limited weight.	form of Planning Guidance, as opposed to a SPD. This guidance will carry reasonable weight in determining planning applications as it is fully consistent with the UDP and has been subject to public consultation and SA at all stages.	
Para 1.2	Bellway Homes (90)	Observations	Although being a material consideration the SPD can have limited weight, and the emphasis must remain on the document being guidance.	See above response to representation 91.	See above proposed changes in relation to representation 91.

## Chapter 2 - Housing In Salford

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
General	Central Salford URC (482)	Observations	It is recommended that this section be amended to include direct reference to the URC and the aspirations and objectives contained in the Vision and Regeneration Framework which has been adopted by the Council and which sets the context for regeneration in Central Salford.	Agree that reference should be made to the URC and the aspirations and objectives contained in the Vision and Regeneration Framework.	Insert the following text into the document:  "The Central Salford Urban Regeneration Company (URC) brings together public and private sector partners (including Salford City Council, Northwest Regional Development Agency and English Partnerships). The URC has produced a Vision and Regeneration Framework which has been approved by the city council, and sets the context for regeneration in Central Salford. The Vision and Regeneration Framework provides the context for the URC and its partners to work together towards making Central Salford desirable physically, socially and economically. Specifically, it will "create the conditions to bring about more diverse neighborhoods and provide greater housing choice" (page 13). (revised SPD paragraph 2.8).
Para 2.1	United Utilities (28)	Observations	It may not be appropriate to this consultation but sustainable development necessitates managing the demand for natural resources. The design of new and improved housing should reflect the need to manage the demand for water and energy. In this way, the Housing policies of Salford are an opportunity for the local authority to demonstrate its responsible 'green'	Agree that it is important to recognise that sustainable development necessitates managing the demand for natural resources. However it is not considered appropriate to amend this document – the city council will shortly begin work on a Sustainable Design and Construction Guide SPD which will provide guidance to developers on the integration of	None.

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			vision for the future.	sustainable design and construction measures in new developments.	
Para 2.3	GMPTE (367)	Object	Amend paragraph to include the promotion of sustainable patterns of development.	Agree that paragraph 2.3 of the draft document should be amended to include reference to the promotion of sustainable patterns of development. As a whole, the document will support such patterns, by helping to ensure that higher density residential development is located in the most accessible locations.	Amend the document as per consultation response.
Para 2.3	The Emerson Group (187)	Object	Draft PPS3 does not encourage prescription of size, type, tenure and detailed mix in relation to market housing and the SPD should be reviewed in the light of the final PPS3.	<p>The key objective of draft PPS3 is to "ensure that everyone has the opportunity of living in a decent home which they can afford, in a community where they want to live". To help achieve this objective the government is seeking to ensure that a wide choice of housing types is available to meet the needs of all members of the community, and to create sustainable, inclusive, mixed communities in all areas (paragraph 1).</p> <p>The objectives and scope of the document are fully consistent with draft PPS3. However, it is considered that some of the draft policies were a little too prescriptive, and they have been amended accordingly to ensure they take consideration of individual site circumstances.</p>	Amend the document to ensure that the policies take consideration of individual site circumstances.
Para 2.4	North West Regional Assembly (457)	Observations	Reference should also be made to Adopted RSS policies UR6, UR7 and UR9. Reference to draft RSS	Disagree. Although inserting reference to policies UR6, UR7 and UR9 is acceptable in principle, the	None.

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			policies L2 to L5 should also be referenced.	<p>council considers that it would make this section of the document overly long. The intention of this part of the guidance is to provide an overview of the most relevant guidance and policy, and is not intended to be exhaustive.</p> <p>With regards to policies in the draft RSS, it is considered that reference should not be made to them for reasons set out above. Additionally as the policies are in draft form they may be amended or even deleted as a result of the Examination in Public process into draft RSS.</p>	
Para 2.6	Dandara Ltd. (179)	Object	Object to Draft UDP Policy H1 which states that all new residential development will be required to contribute towards the provision of a balanced mix of dwellings within the local area in terms of size, type, tenure and affordability. Not all development sites are appropriate locations for a balanced mix of dwellings.	Policy H1 of the UDP has been subject to Independent examination through a Public Inquiry and has now been adopted and forms part of Salford's Development Plan. It is therefore inappropriate for objections to now be made to UDP policies - such objections should have been made through the UDP review process.	None.
Para 2.9- 2.17	McCarthy and Stone (281)  Peel Investments Ltd. (384)	Object	<p>This section would benefit from a greater understanding of the dynamics of the housing market locally.</p> <p>A full Housing Market Assessment, such as that promised for 2006, to be done jointly with Manchester, may provide the necessary information to fully assess the socio-economic interactions locally and identify the actual needs to be</p>	See the council's response to representations from McCarthy and Stone (representation 280) and Peel Investments (representation 383).	See proposed changes in response to representations from McCarthy and Stone (representation 280) and Peel Investments (representation 383).

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			achieved to provide the right type of accommodation "to attract families to live in Salford" (para 2.12 Housing SPD).		
Para 2.13	The Emerson Group (188)	Object	The SPD does not really address the characteristics of the current housing market (i.e. low levels of owner occupation, high proportions of social rented accommodation, low proportions of detached dwellings and high proportion of smaller dwellings)	<p>It is noted that Salford has a significant proportion of social rented accommodation when compared to the national average. However, this does not mean that there is not a need for further social rented units, especially as the Affordable Housing Needs model shows a shortage of around 600 such units.</p> <p>In the consultation draft SPD the preference was for social rented units to be provided. The requirement for particular units should be linked to need and the characteristics of the surrounding area, and the document has been amended accordingly.</p> <p>The council disagrees that the document does not seek to address the low proportion of detached dwellings and smaller dwellings. Policies HOU1 and HOU2 of the draft SPD sought to ensure that in developments outside of the Regional Centre a minimum proportion of houses should be provided. Draft Policy HOU2 sought to: limit studio apartments; ensure that over half of apartments should be two bedrooms capable of accommodating at least three</p>	<p>Amend the document to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Additionally, where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being a preference for social rented units as in the consultation draft SPD, the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).</p> <p>Amend draft policies HOU1 and HOU2 to make them more flexible and less prescriptive.</p>

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				people; and that where houses are to be provided 75% of these should be at least three bedrooms. Notwithstanding this, it is considered necessary to amend policies HOU1 and HOU2 to provide more flexibility and be less prescriptive, whilst still addressing the aforementioned issues.	
Para 2.16	Ramblers' Association (Manchester and High Peak) (365)	Object	Add "pedestrian accessibility to local facilities" to last sentence of paragraph.  In new developments off-road routes should be created to local facilities, and existing off-road routes maintained where possible in redeveloped areas.	Agree to add "pedestrian accessibility to local facilities".	Amend the document as per consultation response (revised paragraph 2.17).
Para 2.17	Ramblers' Association (Manchester and High Peak) (366)	Observations	Whilst supporting the need for affordable homes, we also support the need for a mix of accommodation types and agree with the statement that a shortage of "executive" housing could lead to a "mismatch in the location of jobs and where people want to live, leading to larger journeys to work".  If accommodation for more aspirational occupiers is not provided, they will choose to live outside the city, putting pressure on greenfield sites and possibly commuting into the city by car, with increased traffic congestion and vehicle emissions.	Comments Noted.	None.
Para 2.18	The Emerson Group (189)	Object	The Group find it difficult to understand how the average house	House prices were calculated using property price data provided by	Amend the document to change the average house price to income ratio

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			<p>price to average household income ratio has been calculated. Given para 2.10 indicates that average household income in 2005 was said to be £28,000, to have this ratio (5:1) the average house price would have to be £140,000. However the average house price of all properties sold in the last quarter of 2005 within Salford is £101,967. This gives a ratio of 3.64 (Proviser/Land Registry Housing Sales data).</p>	<p>Land Registry, and relate to all sales within a calendar year. Household income has been calculated using data from CACI. Comparing the average house price to average income produces the ratio. The data collected by the city council is available at a city wide level and has also been broken down to ward level, using GIS software functions.</p> <p>The fourth bullet point in paragraph 4 states that the average house price to household income has risen from 4:1 to more than 5:1 between 2002 and 2004. Since publication of the draft SPD data has been reviewed and updated. Therefore the average house price to income ratio in 2002 was actually 3.8 and in 2004 it was 4.7.</p> <p>Notwithstanding this, paragraph 2.10 does state that average household income in 2005 was £28,000. However the ratio of house price to income of 5:1 is for 2004, so it is wrong to assume that the average house price in Salford in 2005 was £140,000.</p> <p>At the time the draft SPD was produced, average house price data for 2005 was not available. However this data is now available and the average house price in 2005 (Jan-Dec) based on 3733</p>	<p>for 2002 from 4.1 to 3.8 and include the 2005 ratio of 4.4 (as opposed to the 2004 ratio) (paragraph 2.19).</p>

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				sales was £122,968. Given that average income is £28,000 this gives an average house price to income ratio for 2005 of 4.4.	
Paras 2.18- 2.20	McCarthy and Stone (282)  Peel Investments Limited (385)	Object	There is nothing within this section to explain why Policy HOU 5 now seeks 20% affordable housing from all new developments and generally seeks this in the form of social rented provision (especially considering the high proportion of social rented stock).	The justification for the 20% requirement is set out in the reasoned justification to draft policy HOU5. This will be expanded in the final version of the document to ensure that the reasoning is completely clear.  It is accepted that social rented accommodation may not always be the most appropriate form of new affordable housing, and the document will be amended to provide more flexibility in this regard.	Amend the document to provide further justification for the 20% requirement and clarify that the preference for type of affordable units will be determined having regard to need and other factors.
Paras 2.21- 2.26	McCarthy and Stone (283)  Peel Investments Limited (386)	Object	This section identifies 4 quite distinct Zones, but does not clarify what the 'detailed analysis' is to support this, who did the research, how old it is, or even if it has been subject to any form of public scrutiny.  This section does not appear to support the whole City approach proposed in Policy HOU 5, and appears to pay little regard the UDP Inspector's comments (paragraph 7.80), in terms of having different requirements in different parts of the city.	Agree that further details are needed as to the analysis undertaken in support of the document.  Concern over the city-wide 20% requirement is noted. However it is considered that the problems of affordability are felt across the city with the issue broadly being one of low incomes in Central Salford, and high house prices in the Regional Centre and West Salford. It is therefore considered that a city wide requirement is most appropriate.  Notwithstanding this, the council proposes to amend the document to	Amend the document to state that the analysis was undertaken by officers from the council's Housing and Planning Directorate at the beginning of 2006. Also state that the following datasets were examined at the smallest area level: migration flows; self containment rates; household composition; house types; dwelling size; overcrowding; population change; population age; house prices; household income; house price to income ratio; tenure; council tax bandings; ethnicity; Index of Deprivation 2004; worklessness; benefit claim rates; dwelling vacancy rates; academic qualifications; and potential new dwelling distribution.

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				state that a lower proportion of affordable housing, or a lower commuted sum, may be permitted where material considerations indicate that this would be appropriate. The approach therefore enables the consideration of site-specific circumstances to inform the application of the requirement.	Amend the document to state that "a lower proportion of affordable housing, or a lower commuted sum, may be permitted where material considerations indicate that this would be appropriate". Insert examples of such considerations in to the SPD.
Para 2.27	McCarthy and Stone (284)  Peel Investments Limited (387)	Observations	Noted – but how will this be translated into policy?	Paragraph 2.27 states that there is particular evidence of overcrowding in Kersal, and especially the Broughton Park area of that ward. The city council sought to partly address this issue in the draft SPD by requiring at least 20% of new houses within Broughton Park to have at least 5 bedrooms. It is considered that the requirement is currently too prescriptive and the policy is proposed for amendment to enable site circumstances to be taken into account.	Amend the document to state that within Broughton Park residential developments should include a significant proportion of dwellings with 5 bedrooms or more wherever practicable. The RJ states that ideally this would equate to 20% of dwellings, although it is recognised that the constrained nature of some sites may not always make this practicable.
Para 2.28	McCarthy and Stone (285)  Peel Investments Limited (388)	Object	Query what base data was used to inform the Supporting People Strategy 2005 – 2010. We believe that this section will also benefit from information collected through the Housing Market Demand and Housing Needs Study 2006 soon to be commissioned	The Supporting People Strategy was based on various data sources. These include: the 2001 Census; New Earning Survey: resident based statistics (2003); and a Housing Market Demand Study (2003).  The analysis of current provision was undertaken using existing records, and examined bed spaces, funding and average unit costs for different client groups. The Supporting People Strategy 2005-	None.

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				10 is available, from the council's website at <a href="http://www.salford.gov.uk/sp_strategy.htm">http://www.salford.gov.uk/sp_strategy.htm</a> .	
Para 2.32	McCarthy and Stone (286)  Peel Investments Limited (389)	Object	These assumptions would also benefit from up to date research which will hopefully be achieved through the new Housing Market Assessment currently being commissioned.	The assumptions are considered to be robust, although agree that a future Housing Needs and Demand study may be useful in testing them.	None.
Para 2.33	McCarthy and Stone (287)  Peel Investments Limited (390)	Observations	Will the new Housing Market Assessment currently being commissioned help to clarify the needs of Gypsies and Travellers?	<p>The Housing Needs and Demand Study Project Group are still considering whether to accept the appointed consultants option to undertake a separate analysis of the needs of gypsies and travellers (alongside the main study).</p> <p>The North West Regional Assembly has commissioned a regional research project into assessing Gypsy &amp; Travellers accommodation needs up to 2016, whilst the Greater Manchester Authorities are considering undertaking sub-regional research. The Project Group are therefore keen to ensure that there would be no overlap between the other studies, and any study carried out in Manchester/Salford as part of the joint Housing Needs and Demand Study.</p>	None.

### Chapter 3 – Objectives and Scope of the SPD

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
General	Bellway Homes (92)	Object	Do not object in principle to the objectives of the SPD although mechanisms to achieve them are too prescriptive. Do not allow proposals to respond to: <ul style="list-style-type: none"> <li>• Market considerations including land ownership;</li> <li>• Site specific constraints and opportunities</li> <li>• Suitability of the scale, nature and housing types when viewed in the context of the immediate surroundings and neighbourhood.</li> </ul>	The city council recognise that the policies are too prescriptive in places and that they should be amended to be provide more flexibility and to take account of site-specific considerations.	Amend the document in order to make it less prescriptive and more flexible. Proposed changes address those concerns raised in this representation.
General	McCarthy and Stone (288)  Peel Investments Limited (391)	Object	The extent of change to existing UDP policies this SPD is supporting is so great that they must be introduced through a Housing DPD, only after the Council has completed their Statement of Community Involvement and Core Strategy.	<p>The council does not consider that the draft SPD is introducing new issues not identified in the UDP. The draft SPD augments policies in the UDP (particularly H1, H4 and H7),and does not introduce a new policy approach..</p> <p>The council does however feel it is appropriate to make changes to further explain and enhance the links to those policies in the UDP. These changes make more explicit the connections to criteria A-H of UDP Policy H1 (with the policies in the revised document explaining how those criteria will be applied in certain circumstances, and that these are supplementing existing policies rather than introducing new ones).</p>	Amend the document to be less prescriptive, provide greater flexibility to developers, and make clearer the linkages to policies in the UDP.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>The policies on affordable housing have been simplified and made less prescriptive to ensure that they sit fully within the parameters set by UDP Policy H4.</p> <p>It is acknowledged that the policies on Lifetime Homes and redeveloping large homes could be considered to introduce some new policy, and therefore they have been deleted.</p> <p>Notwithstanding the above comments, the city council consider that in order to comply fully with the requirements set out in PPS12 and the Regulations, it is most appropriate to provide advice in the form of Planning Guidance, as opposed to a SPD. This guidance will carry reasonable weight as it is fully consistent with the UDP and has been subject to public consultation and SA at all stages.</p>	
3.2	The Emerson Group (190)	Object	Prescribing too closely the mix, type and size is not acceptable and intervention such as this will not lead to regeneration. Market housing provision will follow demand.	<p>Agree in part that some amendments to the policies would help to maximise the positive impact on regeneration within the city. Issues of viability have therefore been emphasised more in the final version of the document.</p> <p>There is a need for intervention in the housing market to ensure that a balanced mix of dwellings is</p>	<p>Various changes have been made throughout the document to make it less prescriptive, and also recognise the potential impact on regeneration schemes the policies may have.</p> <p>Policies are now less prescriptive, with minimum percentages having been removed. Additionally, it is now clearer that alternative approaches in relation to the type and size of new dwellings</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				provided and sustainable communities are created. The lack of houses being provided within the city means that the demand for such accommodation cannot be met in Salford, and people are forced to look elsewhere to meet their needs.	may be permitted where it can be clearly demonstrated that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP policy H1. Criteria G and H of this policy relate to the Housing Market Renewal Initiative and any other regeneration strategies approved by the city council.
3.2	GMPTE (368)	Object	Promoting sustainable patterns of development should be one of the objectives of the SPD.	Agree. Amend the document accordingly.	Amend the document by inserting a new objective to read "To secure more sustainable patterns of development". Also amend paragraph 3.2 to state that the document focuses on ensuring that higher density new housing is directed towards the most accessible locations.
3.3	North West Regional Assembly (458)	Support	The Assembly support the approach set out in the section noting that the SPD cannot consider the accommodation needs of Gypsies and Travellers.	Comments Noted.	None.

## Chapter 4 – Securing a Mix Of Dwellings

### Policy HOU1 – Type of New Dwellings

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU1	United Utilities Property Solutions (43)	Object	<p>The policy is too prescriptive and not based on empirical research as prescribed in guidance. Therefore delete part one of the policy that refers to the percentage mix of housing</p> <p>High density development is more suited to the sites that are well located in sustainable locations and well served by public transport. Insistence on lower density development is therefore inconsistent with PPG3. The policy will also lead to areas becoming more socially exclusive by reason of reducing the mix of housing across the City.</p> <p>The appropriate method of dealing with this issue would be to make site specific allocations within the Local Development Framework based on robust evidence of housing market need and, in accordance with RSS, the area-based assessment should also have demonstrably taken account of the link to employment need.</p>	<p>Agree that the policy should be less prescriptive. The city council does not however agree that the document is based on a lack of evidence. Paragraph 2.21 of the draft SPD states that a detailed analysis of a comprehensive range of housing and other socio-economic data was undertaken, whilst housing market typologies were also developed to assess the health of the housing market in each of Salford's wards (paragraph 2.26). Other information used to inform the draft SPD is set out in paragraphs 2.9 to 2.35 of the draft. The policy was also justified in the reasoned justification.</p> <p>Although the council considers that the evidence base for the document is robust it considers that further information should be provided as to the nature of the detailed analysis of housing and other socio-economic data referred to in paragraph 2.21.</p> <p>Agree that high density development is better suited to sites that are well located and well located. However the policy already seeks to do this by locating the</p>	<p>Redraft the policy and justification to make it less prescriptive by removing the minimum percentages of dwellings to be in the form of houses from the policy. Also amend the document to state that alternative approaches to dwelling mix may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1.</p> <p>Amend the document to state that the analysis was undertaken by officers from the council's Housing and Planning Directorate at the beginning of 2006. Also state that the following datasets were examined at the smallest area level: migration flows; self containment rates; household composition; house types; dwelling size; overcrowding; population change; population age; house prices; household income; house price to income ratio; tenure; council tax bandings; ethnicity; Index of Deprivation 2004; worklessness; benefit claim rates; dwelling vacancy rates; academic qualifications; and potential new dwelling distribution.</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>highest density development in the most accessible locations (such as the regional centre and town and neighbourhood centres). Those areas that are relatively less accessible, such as West Salford, are generally suitable for less dense development and the policy reflects this.</p> <p>Disagree that the policy would reduce the mix of housing across the city. On the contrary, it would help to ensure a good mix in new developments, addressing the general lack of houses in new proposals.</p> <p>Disagree that the appropriate method of dealing with the type of dwellings is through a site allocations DPD. It would not be possible to identify all sites in such a document, especially windfall sites that come forward on land that is already in use at the time such a document is produced. In any regard, it is considered that where appropriate there should be a mix of dwellings in all developments, irrespective of the scheme size. It would not be possible to do this through an allocations document.</p>	
HOU1	Bellway Homes (93)	Object	Headline figures seeking to encourage houses as opposed to apartments are too prescriptive.	Agree in part that policy HOU1 is too prescriptive, but consider that the overall principle of the policy is appropriate and fully consistent with national guidance and the UDP.	Redraft the policy and justification to make it less prescriptive by removing the minimum percentages of dwellings to be in the form of houses from the policy.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
					Also, amend the document to state that alternative approaches to dwelling mix may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1.
HOU1	Persimmon Homes (North West) (116)  Wilberton Properties (124)	Object	The proposed percentages are very high in some areas and could have a serious impact upon regeneration. May conflict with PPG3 density requirements.  However, Wilberton Properties note that their site is excluded and support this exclusion.	The different percentages in the draft SPD are based on considering what is needed to build sustainable communities, and also reflect the relative levels of accessibility and the existing character of different areas. Agree in part that some amendments to the policies would help to maximise the positive impact on regeneration within the city. Issues of viability have therefore been emphasised more in the final version of the document.  It is not considered that the document conflicts with density advice in PPG3. Paragraph 58 of PPG3 states that Planning Authorities should avoid developments of less than 30 dwellings per hectare net); encourage housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and seek greater intensity of development at places with good public transport accessibility. This UDP approach to density in policy H1 criterion 2, is	Various changes have been made throughout the document to make it less prescriptive, and also recognise the potential impact on regeneration schemes the policies may have.  Policies are now less prescriptive, with minimum percentages having been removed. Additionally, it is now clearer that alternative approaches in relation to the type of new dwellings may be permitted where it can be clearly demonstrated that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP policy H1.  Criteria G and H of policy H1 relate to the Housing Market Renewal Initiative, and any other regeneration strategies approved by the city council. Therefore it is clear that regeneration will be an important consideration in determining whether a different mix to that set out in the guidance is acceptable.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>broadly in line with the approach in PPG3.</p> <p>The document seeks to focus the greatest density of development in the regional centre and town / neighbourhood centres, by placing no restriction on the level of apartments. Similarly the policy recognises that Central Salford is relatively more accessible than West Salford and so therefore in Central Salford the policy allows for a greater proportion of apartments.</p> <p>Even in west Salford where the draft SPD placed a requirement of a minimum 90% houses, it is still considered that 30 dwellings per hectare can be achieved. Schemes which include a mixture of different house types (e.g. detached and townhouses) can easily achieve the minimum density requirements set out in UDP Policy H1 and PPG3.</p> <p>The council note that the Wilberton properties site is within an area where there is no minimum proportion of houses.</p>	
HOU1	<p>Persimmon Homes (North West) (117)</p> <p>Wilberton Properties (125)</p>	Object	Reference should be made to brownfield land and contamination as examples of where a lower proportion of houses may be acceptable (in particular the suitability of such land for use as family housing with gardens).	Agree that contamination may be a reason for why a lower proportion of houses may be more acceptable. However it should be noted that contamination can often be ameliorated to a sufficient extent for gardens to be provided, and therefore its prescience will not	None.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>automatically mean that houses are not appropriate.</p> <p>The council does not consider that there is a need to make specific reference to brownfield land and contamination. Paragraph 4.14 of the revised document sets out examples of where individual sites may differ from the approach in policy HOU1 - these are only examples and are not intended to be exhaustive. In any regard, one of the examples given is that "the physical characteristics of the site make it impossible to satisfactorily accommodate a significant proportion of houses". Additionally the revised document is clear that in determining the appropriate mix of dwellings on a site regard should be had to "The physical characteristics of the site" (UDP Policy H1, criterion B).</p>	
HOU1	Vermont Developments (132)	Support with conditions	On the basis that our client's interest is located within policy area MX1/2 Chapel Street West (site on Adelphi Street), and that the site is therefore excluded from the requirement to provide a minimum number of houses in any residential development, we have no objection to HOU1.	Comments Noted.	None.
HOU1	George Wimpey Manchester Ltd. (142)	Object	The policy is unnecessary and unjustified by any robust housing needs assessment or regional strategy. Until Policy HOU1 can be justified it is premature to set such a	The city council does not agree that policy HOU1 is based on a lack of evidence. Paragraph 2.21 of the draft SPD states that a detailed analysis of a comprehensive range	Amend the document to state that the analysis was undertaken by officers from the council's Housing and Planning Directorate at the beginning of 2006. Also list the datasets that

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	Vanguard Textiles Ltd (341)		restrictive requirement and should be deleted.	of housing and other socio- economic data was undertaken, whilst housing market typologies were also developed to assess the health of the housing market in each of Salford's wards (paragraph 2.26). Other information used to inform the draft SPD is set out in paragraphs 2.9 to 2.35 of the draft SPD.  The reasoned justification to policy HOU1 further provides justification for the policy.	were examined as part of this analysis.
HOU1	George Wimpey Manchester Ltd. (143)  Vanguard Textiles Ltd (342)	Object	There is no explanation of how the percentages in the policy have been decided. Until Policy HOU1 can be justified through evidence it is premature to set such a restrictive requirement. The policy should therefore be deleted.	The different percentages in the draft SPD were based on considering what was needed to build sustainable communities, and also reflects the relative level of accessibility and the existing character of different areas. The percentages are explained in the justification to policy HOU1.  However, it is recognised that as drafted the policy was perhaps too prescriptive and therefore needs amending to provide greater flexibility. It is not considered appropriate to delete the policy.	Amend the document to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A- H of UDP Policy H1".
HOU1	George Wimpey Manchester Ltd. (144)  Vanguard	Object	The fifth bullet point in the list of examples where a lower proportion of houses may be acceptable is vague. It is unclear what is meant by 'very high levels of public transport' and this should be clearly	Agree that it is unclear as to what the council understand by 'very high levels of public transport'.	Amend the document to include examples of 'very high' levels of public transport accessibility. Paragraph 4.14 of the revised guidance states that examples include sites directly adjacent to

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	Textiles Ltd (345)		defined.		Metrolink/Rail Stations and Quality Bus Corridor bus stops.
HOU1	George Wimpey Manchester Ltd. (145)  Vanguard Textiles Ltd (346)	Object	Exceptions should be expanded to include sites with high remediation costs and/or high servicing / infrastructure costs, or sites where the developer has agreed to enter into a planning agreement which provides other significant community benefits.	<p>Agree that high remediation / servicing / infrastructure costs may be a reason for why a lower proportion of houses may be more acceptable. One of the examples for why a lower proportion of houses may be acceptable is that "the physical characteristics of the site make it impossible to satisfactorily accommodate a significant proportion of houses" (paragraph 4.14 revised guidance). Additionally, the document is clear that in determining the appropriate mix of dwellings on a site regard should be had to "The physical characteristics of the site" (UDP Policy H1, criterion B).</p> <p>The city council does not consider that the policy should allow an exception to the approach set out in the document when a development would provide other community benefits. Any exception should be to the policy rather than within it because it does not relate to an inherent characteristic of the site.</p>	Amend the document to include examples of where individual sites may differ from the approach in policy HOU1.
HOU1	The Emerson Group (191)	Object	The policy is prescriptive and a mix is also often needed to meet the policy constraints relating to densities. There is a need for balance against what the market wants and the overall offer on the site.	<p>Agree in part that draft policy HOU1 is too prescriptive.</p> <p>It is not considered that the document conflicts with density advice in PPG3. Paragraph 58 of PPG3 states that Planning Authorities should avoid</p>	<p>Redraft the policy and justification to make it less prescriptive by removing the minimum percentages of dwellings to be in the form of houses from the policy.</p> <p>Also, amend the document to state that alternative approaches to dwelling</p>

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				<p>developments of less than 30 dwellings per hectare net; encourage housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and seek greater intensity of development at places with good public transport accessibility. This UDP approach to density in policy H1 criterion 2 is broadly in line with the approach in PPG3.</p> <p>The document seeks to focus the greatest density of development in the regional centre and town / neighbourhood centres, by placing no restriction on the level of apartments. Similarly the policy recognises that Central Salford is relatively more accessible than West Salford and so therefore in Central Salford the policy allows for a greater proportion of apartments.</p> <p>In West Salford where the draft SPD requires a minimum of 90% of dwellings in the form of houses, it is considered that schemes can still easily achieve a density of over 30 dwellings per hectare when a mixture of different house types (e.g. detached and townhouses) are provided.</p>	<p>mix may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1.</p>
HOU1	Barratt (Manchester) Ltd (206)	Object	Support the policy in principle but the policy should give the developer some scope to justify the preferred form of development. It should also	Note general support for the policy. The council agree that the policy should be amended to allow the developer the scope to justify the	Amend the document to allow the scope for developers to justify a particular mix by inserting the following text "Alternative approaches

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			give sufficient weight to viability and market demand and treat mixed-use developments in a pragmatic manner.	preferred form of development.	may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".
HOU1	Eccles Masonic Hall Ltd (216)	Object	The policy is far too prescriptive and fails to recognise the variety of housing types and densities across the city.	Agree in part that draft SPD policy HOU1 is too prescriptive, and that it should be amended to provide greater flexibility.	Redraft the policy and justification to make it less prescriptive by removing the minimum percentages of dwellings to be in the form of houses from the policy.  Also, amend the document to state that alternative approaches to dwelling mix may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1. Criteria C of Policy H1 states that regard will be had to "The mix of dwellings in the surrounding area".  Revised paragraph 4.15 (reasoned justification to Policy HOU1) states that "It will be the responsibility of the applicant to demonstrate why the proposed mix of dwellings is appropriate".
HOU1	Eccles Masonic Hall Ltd (217)	Object	The requirement that 90% of dwellings should be in the form of houses in West Salford, Broughton Park and Claremont is unrealistically high, and is not related to actual housing demand, which is for single person and smaller households.	The 90% requirement in the draft SPD for houses in West Salford, Broughton Park and Claremont was based on considering what was needed to build sustainable communities, and also reflects the relative level of accessibility and the existing character of these areas.	Amend the document to remove the 90% requirement, and insert "Within West Salford, Broughton Park, Claremont and the northern part of Weaste and Seedley the large majority of dwellings within new developments should be in the form of houses rather than apartments, in order to protect the character of the

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				<p>The council recognise that average household sizes are declining and the number of single person households is increasing. However, it is too simplistic to automatically equate this with a need for smaller dwellings, as many smaller households may require larger dwellings, for example to allow them to work from home. Equally, smaller households may choose to cohabit for social or financial reasons. More importantly, it is essential that the city has accommodation necessary to attract and retain larger households, otherwise it will not provide mixed and balanced neighbourhoods.</p> <p>However, it is recognised that as drafted the policy is perhaps too prescriptive and therefore needs amending to provide greater flexibility.</p>	<p>areas and reflect the generally lower levels of accessibility compared to other parts of the city". Amend the reasoned justification to state that "Typically, this will normally mean at least 80-90% of dwellings on individual sites being in the form of houses rather than apartments" (revised paragraph 4.6).</p> <p>Also amend the document to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>
HOU1	Eccles Masonic Hall Ltd (218)	Object	The policy will stifle development by making many sites unviable.	Disagree. There is no evidence that the provision of houses on sites would make them unviable.	None.
HOU1	Eccles Masonic Hall Ltd (219)	Object	The policy will discourage the efficient use of land, contrary to Government Policy on density.	<p>It is considered that a minimum of 30 dwellings per hectare can be achieved on any site, even with the requirements of Policy HOU1. Achieving this would be in conformity with PPG3 and UDP Policy H1.</p> <p>The document seeks to focus the greatest density of development in</p>	None.

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				<p>the regional centre and town / neighbourhood centres, by placing no restriction on the level of apartments. Similarly the policy recognises that Central Salford is relatively more accessible than West Salford and so therefore in Central Salford the policy allows for a greater proportion of apartments.</p> <p>In West Salford where the draft SPD requires a minimum of 90% of dwellings in the form of houses, it is considered that schemes can still easily achieve a density of over 30 dwellings per hectare when a mixture of different house types (e.g. detached and townhouses) are provided.</p> <p>Notwithstanding this, density is not the only consideration when assessing whether a scheme makes the best use of land. It is vital that the provision of a balanced mix of dwellings to support sustainable communities is also taken into account.</p>	
HOU1	Eccles Masonic Hall Ltd (220)	Object	<p>Further examples of when the requirement for houses may be reduced should include:</p> <ul style="list-style-type: none"> <li>• The existing character and mix of uses and dwelling types in an area;</li> <li>• The prevailing density in an area; and</li> <li>• The relationship of a site to</li> </ul>	<p>The draft SPD included examples of when a lower proportion of houses may be acceptable. In the revised document these examples have been deleted from the policy (and now appear in the reasoned justification), and the policy instead states that applicants should demonstrate that there are circumstances which justify a</p>	<p>Delete examples of when a lower proportion of houses may be acceptable, and instead include them in the reasoned justification. Revise the policy to state: "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard</p>

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			shops, services and social infrastructure.	<p>different mix, particularly having regard to criteria A-H of UDP Policy H1. Criteria C is related to the mix of dwellings in the surrounding area, whilst criteria E states that the accessibility of a site, and its location in relation to jobs and facilities may be a factor in justifying a different mix.</p> <p>Examples of where there may be a different approach to that set out in the policy are included in revised paragraph 4.14. These are only examples, which are not intended to be exhaustive. It is not therefore considered necessary to include those instances suggested by the objector, which are considered to be too vague in terms of their potential impact on the appropriate form of accommodation.</p>	to criteria A-H of UDP Policy H1”.
HOU1	ASK Developments Ltd (225)	Object	ASK supports the exclusion of the Chapel Street East and West and Salford Quay areas from Policy HOU1 although does not support Policy HOU1 in respect of its main provisions.	Comments Noted.	None.
HOU1	Ask Developments Ltd. (230)	Object	The nature of the SPD's policy HOU 1 is highly prescriptive and is inconsistent with the permissive nature of UDP Policy H1. The level of detail in the new policy and the extent of written justification put forward for it demonstrates how unrelated it is to the UDP policy and the need for detailed independent scrutiny of it to occur.	<p>Agree that the draft SPD policy HOU1 is too prescriptive and that it needs to offer greater flexibility to developers.</p> <p>The city council does not consider that draft SPD Policy HOU1 is unrelated to UDP Policy H1. Policy H1 of the UDP states that new developments will be required to</p>	<p>Redraft the policy and the reasoned justification to make it less prescriptive, by removing the minimum percentages of dwellings to be in the form of houses from the policy.</p> <p>Amend the document to state that alternative approaches to dwelling mix may be permitted where it has</p>

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				<p>"Contribute towards a balanced mix of dwellings within the local area in terms of type, tenure and affordability". Policy HOU1 provides further details on what a 'balanced mix' is in terms of dwelling type for particular areas.</p> <p>The city council proposes to amend the document so that applicants can justify their proposed dwelling mix, particularly having regard to criteria A-H of UDP Policy H1. In addition the council proposes to make further cross references between the reasoned justification to the policy, and the UDP.</p> <p>Policy HOU1 expands on criteria A-H of UDP Policy HOU1, and identifies how they are considered to apply to broad areas of the city. The length of the reasoned justification reflects the need to clearly explain how the policy relates to the UDP.</p>	<p>been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1.</p> <p>Also amend the reasoned justification to the policy to make further cross references between the reasoned justification to the SPD policy, and the UDP. See paragraphs 4.2, 4.3, 4.5, 4.7, 4.8, 4.9, 4.11 and 4.13 of the justification to revised policy HOU1.</p>
HOU1	Countryside Properties (Northern) Ltd (250)	Object	The policy would seem to be contrary to PPS3, which requires developers to make the most efficient use of land.	<p>It is considered that a minimum of 35 dwellings per hectare (as proposed in PPS3) can be achieved across the city, even with the requirements of Policy HOU1.</p> <p>The document seeks to focus the greatest density of development in the regional centre and town / neighbourhood centres, by placing no restriction on the level of apartments. Similarly the policy</p>	None.

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				<p>recognises that Central Salford is relatively more accessible than West Salford and so therefore in Central Salford the policy allows for a greater proportion of apartments.</p> <p>In West Salford where the draft SPD requires a minimum of 90% of dwellings in the form of houses, it is considered that schemes can still achieve a density of over 30 dwellings per hectare when a mixture of different house types (e.g. detached and townhouses) are provided.</p> <p>Notwithstanding this, density is not the only consideration when assessing whether a scheme makes the best use of land. It is vital that the provision of a balanced mix of dwellings to support sustainable communities is also taken into account.</p>	
HOU1	Countryside Properties (Northern) Ltd (251)	Object	The policy seems to contradict the aim of creating mixed and balanced communities. The Council recognises that western areas of the Borough are the most desirable and dominated by housing, but seeks to introduce a policy that restricts access to these areas by preventing the development of apartments which are the cheapest form of accommodation for first time buyers, singles and couples etc.	Disagree. The document recognises the importance of protecting the character of those areas, which contributes heavily to their success. However, it also recognises the importance of providing a good mix of dwellings in such areas, and the exceptions (now in paragraph 4.14) would enable additional apartments to come forward, as would the exclusion of town centres and neighbourhood centres from the requirements to provide houses.	None.

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				This will ensure that a balanced mix of dwellings come forward in the western parts of the city where they are most appropriate rather than allowing them to dominate the supply of new housing to the detriment of the character of areas and the overall mix of dwellings.	
HOU1	Home Builders Federation (267)	Object	HBF are concerned about the prescriptive nature of this policy, which should be supported by a Housing Market Assessment and possibly a Sub Regional Housing Market Assessment given the Pathfinder status of some of the area.	<p>Agree in part that policy HOU1 is prescriptive.</p> <p>However, the city council does not agree that the policy is based on a lack of evidence. Paragraph 2.21 of the draft SPD states that a detailed analysis of a comprehensive range of housing and other socio-economic data was undertaken, whilst housing market typologies were also developed to assess the health of the housing market in each of Salford's wards (paragraph 2.26). Other information used to inform the draft SPD is set out in paragraphs 2.9 to 2.35 of the draft.</p> <p>The reasoned justification to policy HOU1 further provides justification for the policy.</p>	<p>Amend the document to state that the analysis was undertaken by officers from the council's Housing and Planning Directorate at the beginning of 2006. Also list the datasets that were examined as part of this analysis.</p> <p>Redraft the policy and the reasoned justification to make it less prescriptive, by removing the minimum percentages of dwellings to be in the form of houses from the policy.</p> <p>Also, amend the document to state that alternative approaches to dwelling mix may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1. Also add revised paragraph 4.14 (reasoned justification to Policy HOU1) which states that "It will be the responsibility of the applicant to demonstrate why the proposed mix of dwellings is appropriate".</p>

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HOU1	McCarthy and Stone (289)  Peel Investments Ltd. (392)	Object	This policy is considered to be unduly restrictive and unjustified by any UDP Policy. It would need to be supported by a robust evidence base and be addressed through a Public Inquiry Process.	<p>Agree in part that draft policy HOU1 is too restrictive. However, the city council does not consider that Policy HOU1 of the draft SPD is insufficiently related to UDP Policy H1.</p> <p>Policy H1 of the UDP states that new developments will be required to "Contribute towards a balanced mix of dwellings within the local area in terms of type, tenure and affordability". Policy HOU1 provides further details on what a 'balanced mix' in terms of type is for particular areas.</p> <p>The city council propose to amend the document so that applicants can justify their proposed dwelling mix, particularly having regard to criteria A-H of UDP Policy H1. In addition the council proposes to make further cross references between the reasoned justification to the policy and the UDP.</p> <p>Do not consider the draft SPD / policy is unjustified by a robust evidence base. The different percentages were based on considering what was needed to build sustainable communities, and also reflects the relative level of accessibility and the existing character of different areas.</p>	<p>Redraft the policy and the reasoned justification to make it less prescriptive, by removing the minimum percentages of dwellings to be in the form of houses from the policy.</p> <p>Amend the document to state that alternative approaches to dwelling mix (from that set out in the policy) may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1. Also add revised paragraph 4.14 (reasoned justification to Policy HOU1) which states that "It will be the responsibility of the applicant to demonstrate why the proposed mix of dwellings is appropriate".</p> <p>Amend the reasoned justification to make further cross references between policy HOU1 and the UDP.</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>In addition, Paragraph 2.21 of the draft SPD states that a detailed analysis of a comprehensive range of housing and other socio-economic data was undertaken, whilst housing market typologies were also developed to assess the health of the housing market in each of Salford's wards (paragraph 2.26). Other information used to inform the draft SPD is set out in paragraphs 2.9 to 2.35 of the draft.</p> <p>The reasoned justification to policy HOU1 further provides justification to the approach taken in the policy.</p>	
HOU1	<p>McCarthy and Stone (290)</p> <p>Peel Investments Ltd. (393)</p>	Object	<p>Policy HOU 1 appears to be linking through to UDP Policies MX1/1 to MX1/3. These policies only relate to mixed use developments as detailed within Chapter 5 of the UDP. The very nature of mixed use sites do not generally lend themselves to high proportions of family housing.</p>	<p>Agree that the draft SPD does link through to UDP Policies MX1/1 to MX1/3 (amongst others). These locations are part of the regional centre and given the very high levels of accessibility of this location, and the fact that its special character is partly founded on a very high density of development, the council agrees that such locations do not generally lead themselves to high proportions of family housing. This is why the draft SPD was worded as such so that in these areas no minimum proportion of houses would be required.</p>	None.
HOU1	<p>McCarthy and Stone (291)</p> <p>Peel Investments Ltd. (394)</p>	Object	<p>We acknowledge the various exceptions listed but suggest that should a mix Policy such as this, (should it ever be justified), should not apply to private sector specialised forms of housing such</p>	<p>The council acknowledges that it may not be appropriate to apply the policy to certain private sector specialised housing developments.</p> <p>Examples of where there may be a</p>	<p>Amend the document to state that an example of when an alternative approach to the mix may be acceptable is where "The scheme consists wholly of affordable housing, supported housing (including</p>

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			as Category II Sheltered Accommodation, or Student Accommodation for example.	different approach to that set out in the policy are included in paragraph 4.14 of the revised document. The council agree that private sector specialised housing could be one such example.	Category II Sheltered Accommodation), or student housing, and there is a demonstrable demand for the type of dwellings proposed" (penultimate bullet point, revised paragraph 4.14).
HOU1	McCarthy and Stone (292)  Peel Investments Ltd. (395)	Object	The policy does not supplement H1, and the reference to family housing in the RJ only refers to the need to increase the level of family accommodation in many parts of the City.	<p>The city council do not consider that draft SPD Policy HOU1 is unrelated to UDP Policy H1. Policy H1 of the UDP states that new developments will be required to "Contribute towards a balanced mix of dwellings within the local area in terms of type, tenure and affordability". Draft Policy HOU1 provides further details on what a 'balanced mix' is in terms of dwelling type for particular areas.</p> <p>The city council propose to amend the document so that applicants can justify their proposed dwelling mix, particularly having regard to criteria A-H of UDP Policy H1. In addition the council propose to make further cross references between the reasoned justification , and the UDP.</p> <p>Policy HOU1 expands on criteria A-H of UDP Policy HOU1, and identifies how they are considered to apply to broad areas of the city.</p>	<p>Amend the document to state that alternative approaches to dwelling mix (from that set out in the policy) may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1.</p> <p>Also amend the reasoned justification to the policy to make further cross references between the reasoned justification, and the UDP. See paragraphs 4.2, 4.3, 4.5, 4.7, 4.8, 4.9, 4.11, 4.13 and 4.15 of the justification to revised policy HOU1.</p>
HOU1	Vanguard Textiles Ltd. (343)	Object	If the Council is to proceed with the 25% policy for the Ordsall Lane Riverside Corridor, the 25% should relate to site area, not "proportions	The percentage requirement as set out in the draft SPD has been deleted from the revised document.	Amend Policy HOU1 to state that "The Ordsall Lane Riverside Corridor (as defined by UDP Policy MX1/4) does however offer the opportunity to

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			of dwellings". This should ensure delivery of houses without compromising viability on complex previously developed sites in the Corridor.		provide a broader mix of housing types than in other parts of the Regional Centre including houses as well as apartments".  Also insert additional text in the reasoned justification to state that it will be appropriate for a significant number of houses to be brought forward in the Corridor, and that there is a need for a Masterplan to guide development in the area (revised paragraph 4.8).
HOU1	Vanguard Textiles Ltd. (344)	Object	The first bullet point in the list of scenarios whereby a lower proportion of houses may be acceptable, should refer to urban design context rather than simply design context.	The council agree that to provide greater clarity the first bullet point should be changed to refer to 'urban design context', as opposed to simply 'design context'.	Amend the document to state that "the urban design context requires a scale of building that could not be achieved in the form of houses", as opposed to just the 'design context' ( <i>note that the list of examples of where a lower proportion of houses may be acceptable is now in the RJ to policy HOU1</i> ).
HOU1	GONW (356)	Object	We cannot see how there is a clear and direct connection with UDP policy H1. The correct approach would have been for UDP policy H1 to set a range of dwelling (houses) proportions to be sought (for example, 25% to 35% in Ordsall Lane Riverside Corridor) within which SPD policy HOU1 could have set a specific percentage (say 30%) based upon current market circumstances.	UDP Policy H1 is clear that the appropriate mix and density of dwellings will be determined having regard to 8 different criteria (identified as A-H in the policy). The draft SPD explains how these criteria are likely to be applied in different parts of the city, and therefore sits fully within the UDP. However, it is accepted that draft Policy HOU1 was overly prescriptive and therefore the	Amend the document to state that alternative approaches to dwelling mix (from that set out in the policy) may be permitted where it has been demonstrated by the applicant that there are specific circumstances to justify this, particularly having regard to criteria A-H of UDP policy H1.  Also amend the reasoned justification to the policy to make further cross references between the reasoned

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				percentages have been deleted from the policy.	justification and the UDP. See paragraphs 4.2, 4.3, 4.5, 4.7, 4.8, 4.9, 4.11 and 4.13 of the justification to revised policy HOU1.
HOU1	GMPTE (369)	Support	GMPTE supports the statement that "very high levels of public transport accessibility justify a high density development that maximises the number of people able to utilise that public transport."	Support Noted.	None.
HOU1	Mr C Rustage (374) Dain Properties Ltd (376) Chapel Invest Holdings Ltd (377) Knight Frank LLP (380)	Object	This policy represents an inappropriate intervention in the housing market and the number of examples of circumstances when a lower proportion of houses may be appropriate is evidence enough of the impracticality of enforcing such a policy.	Do not consider that the policy is an inappropriate intervention in the housing market. Policy H1 of the UDP states that all new developments should "Contribute towards the provision of a balanced mix of dwellings within the local area in terms of size, type, tenure and affordability". Policy HOU1 of the UDP provides further guidance as to what the city council understands to be a balanced mix of dwellings in terms of type in different parts of the city.  The list of potential exceptions is not evidence of the impracticality of the policy, but rather the fact that individual site circumstances will always need to be taken into account, even though the overall approach in the policy will be appropriate in most situations.	None.
HOU1	David Wilson Estates (442)	Object	It is imperative that appropriate design coding policies are adopted and implemented by the Council throughout Salford. The quality of new apartment blocks in Salford	Comments noted. The city council is producing a Design SPD which could be the appropriate location for any such guidance if it is considered necessary.	None.

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			<p>varies greatly in quality.</p> <p>The contribution of apartment blocks to the street scene and wider area is essential to good urban design. Master planning is particularly important in this respect. Without the policy requirement, developers will continue to treat their sites in isolation, rather than as part of a wider community.</p>		
HOU1	David Wilson Estates (443)	Object	<p>There is a need for a Masterplan for the mixed use areas, as without such a plan the development of these areas will continue to fail to genuinely regenerate Central Salford. Work on the Masterplan could be resourced by landowners and the private sector from the proceeds of land and apartment sales.</p> <p>The policy should qualify the excessive freedom applied to the MX areas with reference to other policy controls requiring a greater contribution to the sustainability of the city than is currently the case.</p>	Agree in part. The city council is working with the Central Salford Urban Regeneration Company, developers and landowners to bring forward Masterplans in large parts of the city (e.g. Greengate, Adelphi).	None.
HOU1	Contour Housing (446)	Observations	Concern that the overall percentages will mean that sites will not get developed, as developers will not be able to make them stack up financially, especially when Planning Obligations SPD is considered.	<p>Disagree. There is no evidence that the provision of houses on sites would make them unviable.</p> <p>The final version of the Planning Obligations SPD will recognise the importance of financial viability considerations when negotiating planning obligations.</p>	None.
HOU1	Cllr Ainsworth	Object	The policy should refer to the need	Paragraph 6.7 of the draft SPD	Amend the document to state that

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
	(463)		to put a break on land values as a means of delivering affordable housing. Specifically reference to land values should be deleted from paragraph 6.7.	<p>states that high development costs (e.g. because of land values may mean that a standard proportion of affordable dwellings will not always be appropriate because of the financial impact.</p> <p>This has been deleted, although the revised document (paragraph 5.9) is clear that high land values will only lead to a reduced requirement for affordable housing, if the land was purchased before the adoption of the SPD. It is anticipated that once the SPD is adopted developers will take into account the need for affordable housing when considering how much to purchase land for.</p>	"The price paid for the land should reflect the need to provide affordable housing, and therefore high land values will only normally be taken into account when the land was purchased before the adoption of this document" (revised paragraph 5.9).
HOU1	Claremont / Weaste Political executive Group (470)	Object	Modify third bullet point of HOU1 to read "90% (houses) in west Salford, Broughton Park, Claremont and that part of the Weaste and Seedley ward north of the M602".	<p>Having examined socio-economic and housing data it is agreed that parts of Weaste and Seedley do have the same characteristics as West Salford. However, this is considered only to relate to the area north of Eccles Old Road, rather than everything north of the M602. Therefore the council considers that the document should be amended to reflect this.</p> <p>Notwithstanding this, the requirement has been amended to refer to the large majority of dwellings being in the form of houses, as opposed to a prescriptive figure of 90%.</p>	<p>Amend the document so that the northern part of Weaste and Seedley (north of Eccles Old Road) is grouped with west Salford, Broughton Park and Claremont.</p> <p>Amend the document to state that in west Salford, Broughton Park, Claremont and that part of the Weaste and Seedley to the north of Eccles Old Road, the large majority of new dwellings within new developments should be in the form of houses as opposed to apartments</p> <p>Amend Reasoned Justification to state that this will normally mean at least 80-90% of dwellings should be in the form of houses rather than</p>

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HOU1	Central Salford URC (483)	Support	Considering that a large part of the area which will be a focus for development and URC activity is excluded from control, and that the policy contains a list of criteria enabling exemption from the policy where comprehensive redevelopment, a tall building or special design solutions etc are proposed, it is recommended that this policy is supported.	Support Noted.	apartments.. None

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Para 4.1	ASK Developments Limited (236)	Object	<p>One would expect a higher proportion of apartments in the main metropolitan centres, which includes Salford. Therefore what would be the harm in 30% of the City's housing stock being in the form of apartments?</p> <p>The main driver in housing need is the increase in the number of households, and an increase in single person households. One would expect the market to respond to the increase in single person households by the provision of apartments, including a high proportion of apartments with one or two bedrooms. Single person households are more likely to be attracted to the Regional Centre, than households with families.</p>	<p>The council recognise that compared to other Local Authority areas Salford will inevitably have a high proportion of apartments, as opposed to houses with planning permission / under construction or completed, due to its location at the core of the conurbation. Therefore in itself 30% of the stock being apartments is not an issue. However, permitting further apartments developments within the less central and less accessible locations within Salford would be inconsistent with policies that seek to locate higher density development in the most accessible locations. The draft SPD seeks to focus higher density development in the most accessible locations. It is also important that the main metropolitan areas can attract and retain larger households, to ensure</p>	Amend the reasoned justification to delete reference to the statement in the reasoned rustication that it is estimated that if all outstanding current planning permissions were implemented then the proportion of apartments in the city as a whole would rise to around 30%.

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				<p>that communities are sustainable.</p> <p>The council recognise that average household sizes are declining and the number of single person households is increasing. However, it is too simplistic to automatically equate this with a need for smaller dwellings, as many smaller households may require larger dwellings, for example to allow them to work from home. Equally, smaller households may choose to cohabit for social or financial reasons.</p> <p>The policy recognises that apartments are generally going to be the most appropriate form of accommodation within the Regional Centre, to cater for one and two person households in particular. However, as experience from other countries demonstrates, apartments do actually have the potential make a significant contribution to supporting the UDP aim of attracting more families to the city.</p>	
Para 4.2	GMPTE (370)	Support	Paragraph 4.2 is to be supported in respect of the intention to locate high density residential developments in areas of high accessibility	Support noted.	None.
Para 4.12	Eccles Masonic Hall Ltd (224)	Object	The definition of a 'house' is too inflexible and should be reworded to include apartments, duplexes and maisonettes as a form of self contained accommodation.	The council does not consider that there is need to reword the definition of a house. It is recognised that apartments, duplexes and maisonettes are self	None.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				contained accommodation, however they cannot be classed as houses.	
Para 4.14	Ramblers' Association (Manchester and High Peak) (364)	Object	Include access to local managed greenspace in housing policy.	Agree that there should be appropriate access to public open space as part of new developments.	Amend the first sentence of the paragraph to read "In achieving an appropriate mix of dwellings, regard must be had to other planning considerations including the need to secure a range of house types, a high standard of amenity, the provision of appropriate levels of indoor and outdoor space (including public open space), and the design context" (revised paragraph 4.18).
Para 4.15	GMPTE (371)	Object	It is suggested that further examples of highly accessible locations are added such as Quality Bus Corridors and Railway stations	Agree in part that the examples of very high transport accessibility should be expanded to include sites directly adjacent to railway stations. It is not though considered appropriate to include reference to Quality Bus Corridors as this would be drawn too wide. However the council does consider that sites directly adjacent to Quality Bus Corridor bus stops are highly accessible, and the reference should be amended accordingly.	Paragraph 4.15 of the draft SPD has been deleted. However paragraph 4.14 of the revised document includes examples of where a deviation from the mix set out in Policy HOU1 may be acceptable. Include, "very high public transport accessibility (e.g. sites directly adjacent to Metrolink/Rail Stations and Quality Bus Corridor bus stops) justify a high density development that maximises the number of people able to utilise that public transport".
Para 4.17	McCarthy and Stone (293)  Peel Investments Ltd. (396)	Object	Policy HOU 1 is premature pending the outcome of the Housing Market Assessment and cannot be supported in the current form.	Disagree that the policy is premature pending the outcome of a Housing Market Assessment. The council has undertaken a robust analysis on which the draft SPD is based. Paragraph 2.21 of the draft SPD states that a detailed analysis of a comprehensive range of housing and other socio-economic data was undertaken, whilst housing market typologies were also developed to assess the health	None.

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				<p>of the housing market in each of Salford's wards (paragraph 2.26). Other information used to inform the draft SPD is set out in paragraphs 2.9 to 2.35 of the draft.</p> <p>The reasoned justification to policy HOU1 further provides justification for the policy.</p>	

## Policy HOU2 – Size of new dwellings

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU2	United Utilities Property Solutions (44)	Object	<p>The restriction of 15% of the total number of apartments in any individual development is arbitrary and inappropriate.</p> <p>The equivalent of providing at least 3 bedrooms in 75% of houses provided in any one scheme could lead to a lack of open market affordable units.</p>	<p>The restriction on studios in the draft SPD was based upon a consideration of what is needed to build sustainable communities.</p> <p>It is considered that too many studio apartments would not help contribute towards a balanced mix of dwellings in terms of type and size (UDP Policy H1). The continuing reduction of dwelling sizes risks creating a dangerously skewed residential market within the city.</p> <p>The increasing dominance of small and very small dwellings in new apartments developments, and within the Regional Centre in particular, effectively excludes a large proportion of households from living there. This works against the provision of sustainable communities, instead leading to increasingly monotonous areas, a lack of social diversity, and households having to move out as their circumstances change in order to meet their housing needs.</p> <p>Disagree that the requirement for 75% of houses to have at least three bedrooms may lead to a lack of affordable units. The draft policy still allows for houses smaller than</p>	<p>Delete the maximum 15% restriction on studio developments. Revise policy to state that "Small dwellings (i.e. Studio and one bedroom apartments) should not predominate".</p> <p>Revise reasoned justification to recognise that small dwellings have an important role to play particularly in terms of providing a more affordable product, especially within the regional centre.</p> <p>Amend the document to state that the majority of new houses should have at least three bedrooms (as opposed to a requirement for a minimum of 75% such dwellings as in the draft SPD).</p> <p>Amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>

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				<p>this to be provided. In the revised policy the 75% requirement has been replaced, with the document now stating that the majority of houses should have at least three bedrooms. It is considered that the provision of such houses will help to further create and sustain mixed communities, and provide more affordable market units.</p> <p>The council recognises that there may be occasions when the mix set out in Policy HOU2 may not be appropriate. Therefore the city council proposes to amend the document to set out circumstances when an alternative mix of unit sizes may be appropriate.</p>	
HOU2	Bellway Homes (94)	Object	Strongly object to the policy - such a prescriptive approach is not acceptable. The council should seek to negotiate a certain size of dwellings.	<p>Agree that policy in the draft SPD is overly prescriptive, and that negotiating the size of dwellings in new developments having regard to particular site circumstances is important. However, the city council consider that in order to provide greater clarity to developers it is important to set out what the city council understands by a balanced mix of dwellings in terms of size of dwellings (linking into Policy H1), to support the development of sustainable communities.</p> <p>The council has amended the policy to be less prescriptive, and to also recognise that there may be individual circumstances where</p>	<p>Amend the policy to state:</p> <ul style="list-style-type: none"> <li>• Majority of new houses to have at least three bedrooms;</li> <li>• Broad mix of apartment sizes in terms of bedroom numbers and floorspace;</li> <li>• Small dwellings such as studios and apartments should not predominate with a significant proportion of three bedroom apartments to be provided wherever practicable.</li> </ul> <p>Additionally, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this,</p>

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				different size units to those set out in the policy may be more appropriate.	particularly having regard to criteria A-H of UDP Policy H1".
HOU2	Persimmon Homes (North West) (109)  Wilberton Properties (121)	Object	<p>Policy HOU2 is totally unreasonable and the rigid imposition of a mix of house types cannot be acceptable when this has not been market tested. Such a policy indicates that the council wish to influence the housing market within Salford which is both impractical and undeliverable.</p> <p>There is a general recognition that within Salford new residential accommodation should meet a full range of needs but on sites close to the regional centre all current policies promote high density mixed use. It would appear that the justification for the policy shift has been to look at UK averages and apply these to Salford, however the SPD points out that the most significant area of growth in the future will be in single households, and surely one of the aims of the HMRI in Salford is to create new family housing.</p>	<p>It is not considered to be either undeliverable or impracticable to require larger dwellings as part of new developments. This is vital to ensuring mixed communities are provided rather than neighbourhoods offering a limited range of accommodation that is only attractive to a very narrow sector of the population.</p> <p>However, the council has amended the policy to be less prescriptive, and to also recognise that there may be circumstances (particularly having regard to Criteria A-H of UDP Policy H1) where different size units to those set out in the policy may be more appropriate.</p> <p>The council recognises that average household sizes are declining and the number of single person households is increasing. However, it is too simplistic to automatically equate this with a need for smaller dwellings, as many smaller households may require larger dwellings, for example to allow them to work from home. Equally, smaller households may choose to cohabit for social or financial reasons.</p> <p>The justification for Policy HOU2</p>	<p>Amend the policy to state:</p> <ul style="list-style-type: none"> <li>• Majority of new houses to have at least three bedrooms;</li> <li>• Broad mix of apartment sizes in terms of bedroom numbers and floorspace;</li> <li>• Small dwellings such as studios and apartments should not predominate with a significant proportion of three bedroom apartments to be provided wherever practicable.</li> </ul> <p>Additionally, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p> <p>Amend the reasoned justification to further amplify the approach taken in the Policy. For example, include details of how recent developments and planning permissions have generally been characterised by small dwellings.</p>

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				was set out alongside the Policy. However, the council recognise that it is appropriate to further explain the approach taken through an amended reasoned justification.	
HOU2	Persimmon Homes (North West) (110)  Wilberton Properties (122)	Object	Policy sets restrictive and prescriptive thresholds with no quantitative analysis.	<p>The council have amended the policy to be less prescriptive, and to also recognise that there may be circumstances (particularly having regard to Criteria A-H of UDP Policy H1) where different size units to those set out in the policy may be more appropriate.</p> <p>The justification for Policy HOU2 was set out alongside the Policy. However, the council recognise that it is appropriate to further explain the approach taken in the reasoned justification, including additional quantitative information.</p>	<p>Amend the policy to state:</p> <ul style="list-style-type: none"> <li>• Majority of new houses to have at least three bedrooms;</li> <li>• Broad mix of apartment sizes in terms of bedroom numbers and floorspace;</li> <li>• Small dwellings such as studios and apartments should not predominate with a significant proportion of three bedroom apartments to be provided wherever practicable.</li> </ul> <p>Amend the reasoned justification to further amplify the approach taken in the Policy. For example, include details of how recent developments and planning permissions have generally been characterised by small dwellings.</p>
HOU2	Persimmon Homes (North West) (111)  Wilberton Properties (123)	Object	There is no justification for such intervention, whilst the policy will be detrimental to the regeneration of the area.	<p>The justification for Policy HOU2 was set out alongside the Policy. However, the council recognise that it is appropriate to further explain the approach taken in the reasoned justification.</p> <p>The council does not agree that the policy would be detrimental to regeneration. Regeneration will only be successful in the long term if it results in balanced and mixed communities, and the provision of</p>	<p>Amend the reasoned justification to further amplify the approach taken in the Policy. For example, include details of how recent developments and planning permissions have generally been characterised by small dwellings.</p> <p>Amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific</p>

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				<p>larger dwellings that are more adaptable and able to meet a wider range of needs is an important part of this.</p> <p>Nevertheless, there may be individual circumstances where an alternative approach may be permitted, where it can be clearly demonstrated by the applicant that there is clear evidence to justify this, particularly having regard to criteria A-H of UDP Policy H1. Criteria G relates to the strategy and proposals of the HMR Initiative, and criteria H to any other relevant housing, planning or regeneration strategies approved by the city council.</p>	<p>circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1”.</p>
HOU2	Persimmon Homes (North West) (112)	Object	Such prescriptive policy could seriously damage the feasibility of developments coming forward, and is out of sync with the housing market	See above response to Persimmon Homes (representation 111) and Wilberton Properties (representation 123).	See above proposed changes in response to Persimmon Homes (representation 111) and Wilberton Properties (representation 123).
HOU2	Vermont Developments (133)	Object	The percentages quoted in this policy are not justified by any evidence. The policy has no apparent flexibility within it to respond to site specific circumstances, and may jeopardise the development of fully sustainable communities within the city.	The percentages in the policy were determined on the basis of (amongst other things) trying to create sustainable communities across the city, and as a response to the large number of small dwellings coming forward and having extant planning permission. However it is considered that the inclusion of percentages is too prescriptive, and that they should therefore be removed from the Policy, whilst still retaining the overall principle of the policy	<p>Amend the policy to remove percentage requirements and state that:</p> <ul style="list-style-type: none"> <li>• Majority of new houses to have at least three bedrooms;</li> <li>• Broad mix of apartment sizes in terms of bedroom numbers and floorspace;</li> <li>• Small dwellings such as studios and apartments should not predominate with a significant proportion of three bedroom apartments to be provided wherever practicable.</li> </ul>

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				<p>consistent with UDP Policy H1.</p> <p>The council recognise that it is necessary to further explain the approach taken in Policy HOU2, and the reasoned justification has been amended accordingly.</p> <p>It is agreed that the policy should allow for an alternative approach if this can be clearly justified by specific individual site circumstances.</p>	<p>Amend the reasoned justification to further amplify the approach. For example, include details of how recent developments and planning permissions have generally been characterised by small dwellings.</p> <p>In order to provide flexibility, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>
HOU2	George Wimpey Manchester Ltd (146)	Object	The percentages quoted in the policy are not justified by evidence. There is a risk that the implementation of this policy will not allow developments in Salford to respond to changing market conditions and demographics, which may jeopardize the development of fully sustainable communities in the city.	See council's response to Vermont Developments (representation 133) above.	See council's proposed changes to Vermont Developments (representation 133) above.
HOU2	Dandara Ltd (180)	Object	The provision of a larger proportion of studios and 1 bed apartments is essential in order to address the issue of affordability, particularly within the MX1/1 area, and is endorsed by the strength of market sales across the region of these smaller apartment types.	Agree in part that there may be occasions when a larger proportion of 1 bed apartments and studios may be appropriate. However, these must not be allowed to dominate provision as they are less adaptable to changing needs, and are only attractive to a narrow sector of the housing markets, which makes areas more vulnerable to market changes and is inconsistent with the objective of	<p>Delete the maximum 15% restriction on studio developments. Revise policy to state that "Small dwellings (i.e. Studio and one bedroom apartments) should not predominate".</p> <p>Revise reasoned justification to recognise that small dwellings have an important role to play particularly in terms of providing a more affordable product, especially within the regional centre.</p>

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				securing mixed, sustainable communities. Tackling affordability is not just about everyone living in very small homes.	
HOU2	The Emerson Group (192)	Object	75% of houses having to be three bedrooms or more is problematic, and will impact on the density of schemes. A three bedroom house comes at a higher cost to buyers because of its larger size. A two bed roomed house, which may be capable of extension to provide three bedrooms when finances allow, can be equally acceptable and in some designs the second bedroom in a two bedroom house could be subdivided into two single bedrooms.	<p>UDP Policy H1 states that all new developments are required to contribute towards a balanced mix of dwellings in the local area in terms of size. Recent developments and planning permissions have generally been characterised by small dwellings. In 2005/06, 80% of completions were for dwellings of less than three bedrooms, whilst only 12% of the 11,242 dwellings with extant planning permission as of 31<sup>st</sup> March 2006 would have three bedrooms or more. As a result households requiring such dwellings are potentially excluded from the market in new housing. It is considered that the draft SPD requirement for 75% of houses to have three bedrooms or more will start to help address this imbalance.</p> <p>It is not considered that providing a high proportion of 3 bedroom houses will be problematic in terms of achieving density targets. Townhouses can be built at a relatively high density, and a mix of other house types can also be provided in such schemes.</p> <p>The need to maintain separation distances and avoid overshadowing means that many 2 bedroom</p>	Amend the document to state that "The majority of new houses should have at least three bedrooms". However also amend the Policy as follows: "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".

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				<p>properties cannot easily be extended to provide additional bedrooms, particularly because of their narrow frontages. It is also rare that the second bedroom in a 2 bedroom house can be easily split into two reasonable sized bedrooms.</p> <p>Notwithstanding these comments, the city council have amended the document to be less prescriptive. The 75% requirement has been deleted, with the requirement now being that the majority of houses should have three bedrooms or more.</p>	
HOU2	Barratt Manchester Ltd. (207)	Object	The policy gives insufficient weight to market demand and viability. Such a prescriptive policy cannot be adequately responsive to changes in the market.	Agree that the policy should allow for alternative approaches if this can be clearly justified by specific, individual site circumstances. However, broader market issues have been taken into account and balanced against policy objectives such as securing sustainable communities. If the market changes significantly, then this may prompt a review of the document if the policies become inappropriate, but it should not be written into the policy, as this could render it meaningless.	In order to provide flexibility, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1". Such circumstance could include the impact on development practicality.
HOU2	Barratt Manchester Ltd. (208)	Object	There is no explanation as to how the preferred percentages have been arrived at.	See the council's response to Vermont Developments (representation 133) above.	See council's proposed changes to Vermont Developments (representation 133) above.
HOU2	Barratt Manchester Ltd. (209)	Object	Unlike with Policy HOU1, the exceptions allowed are wholly inadequate. Dependent on the site the mix of sizes sought within	It is agreed that the policy should allow for an alternative approach if this can be clearly justified by specific, individual site	In order to provide flexibility, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly

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			individual developments may make development impractical.	circumstances.	demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1". Such circumstance could include the impact on development practicality.
HOU2	Eccles Masonic Hall Ltd (223)	Object	It is unrealistic that 75% of new dwellings should have greater than three bedrooms, and it is not related to demand for apartments and properties to cater for smaller households. The percentage should be reduced.	<p>It is not considered unrealistic to require larger dwellings (such as three bedroom or larger houses) as part of new developments.</p> <p>Although the council recognise that average household sizes are declining and the number of single person households is increasing, it is too simplistic to automatically equate this with a need for smaller dwellings. Many smaller households may require larger dwellings, for example to allow them to work from home, or because they require additional bedroom space for visiting children who may live permanently elsewhere. Equally, smaller households may choose to cohabit for social or financial reasons. More importantly, it is essential that new housing supports the development of sustainable communities, where all types of household can meet their needs and dwellings are able to adapt to changing requirements.</p> <p>The predominance of dwellings with two bedrooms or less in the supply of planning permissions (88%) makes it vital that the majority of</p>	<p>Delete the requirement for 75% of houses having to be at least three bedroom, and amend the policy to state that "The majority of new houses should have at least three bedrooms".</p> <p>In order to provide flexibility, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>

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				<p>new houses provide three bedrooms or more in order to ensure a good mix of provision across the city.</p> <p>The council has however amended the policy to remove the requirement for 75% of new houses to have at least three bedrooms. Instead the policy now states that the majority of new houses should have at least three bedrooms. However the council also propose to amend the policy to recognise that there may be circumstances (particularly having regard to Criteria A-H of UDP Policy H1) where different size units may be more appropriate.</p>	
HOU2	Ask Developments (231)	Object	Policy HOU2 is unrelated to the principles of the UDP and establishes entirely new development control principles, which ought to be part of the new LDF development control policies and subject to proper scrutiny.	<p>Disagree. The policy is related to Policy H1 of the UDP which states that all new developments should contribute towards a balanced mix of dwellings in terms of size. The draft SPD explains in greater detail what the city council understands by a balanced mix of dwellings in terms of size.</p> <p>It is therefore not considered that Policy HOU2 introduces entirely new development control principles. However, it is recognised that there is a need to amend the document to further explain the links between it, and the UDP.</p>	Redraft Policy HOU2 so that it is more clearly related to the principles of policy H1 of the UDP, and also recognises that alternative approaches to dwelling mix may be permitted where it can be clearly demonstrated that there are specific circumstances that justify this (particularly having regard to criteria A-H of policy H1).
HOU2	Ask Developments	Object	The key driver of Policy HOU2 appears to be the limited supply of	Agree in part that the draft SPD is too prescriptive and needs to offer	Amend the policy to be less prescriptive, and provide more

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	(233)		family housing, and high quality executive housing. This is indeed an important issue, but it is highly questionable whether the prescriptive approach to limiting the size of new dwellings in Policy HOU2 on sites within the Regional Centre can in any way result in an increase in the provision of good quality family housing, let alone high quality executive housing.	flexibility. Disagree that the policy would not result in high quality housing. The draft SPD would result in a better mix of dwellings, providing for greater needs. Larger units may also help meet a need and demand for family accommodation in the regional centre.	flexibility.
HOU2	Ask Developments (234)	Object	<p>The approved regeneration strategies for Greengate and Clippers Quay, reflected in Policy MX1, and in the Development Framework and Masterplans, do not set out to achieve areas for family housing and high quality executive homes.</p> <p>The ability of developers and house builders to cater for smaller households, and the strong demand for one and two bedroom accommodation is vital, and these households will inevitably constitute a significant proportion of the population of these Regional Centre communities.</p>	Agree. The draft SPD recognises that a significant proportion of dwellings in these locations will be one or two bedroom apartments. However, it is important that they also provide a good mix of accommodation, and are able to attract a broad range of households in order to maximise their sustainability. Therefore, a significant proportion of three bedroom apartments should be provided wherever practicable.	None.
HOU2	Ask Developments (235)	Object	<p>The SPD does not provide, as perhaps one might have expected, a detailed research base analysis of the need for different types of residential accommodation in Salford over the next 10 to 15 years.</p> <p>Paragraph 4.1 is typical of the level</p>	The city council has amended the reasoned justification to provide further justification to the policy. Additionally the policy has been amended to be less prescriptive.	Amend the reasoned justification to further amplify the basis for the policy, and also amend the policy to be less prescriptive.

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			of analysis in the SPD and provides the main statistical basis that underpins HOU2.		
HOU2	Ask Developments (237)	Object	Studio apartments and one or two bedroom apartments within the Regional Centre are not reducing opportunities for family housing or high quality executive homes. They are responding to demand and also providing efficient and viable forms of higher density mixed use developments, kick-starting and contributing to major regeneration initiatives.	<p>The city council recognises that studio apartments and 1/2 bedroom units are responding to a particular demand in the Regional Centre, and that they can kick-start and contribute to regeneration initiatives. However, the dominance of small dwellings and the continuing reduction of dwelling sizes, risks creating a dangerously skewed residential market.</p> <p>It is essential that new developments contribute towards a balanced mix of dwellings within the local area, in accordance with criterion 1 of UDP Policy H1. The provision of new residential accommodation within the city should provide for a full range of needs and should not be unduly dominated by a certain type of dwelling size. Three bedroom apartments are important in providing a diverse mix of units, and the council proposes to amend the document to reflect this.</p> <p>However, as worded the council considers that the draft SPD is too prescriptive and does not offer enough flexibility to developers. The council therefore proposes amendments to address this.</p>	<p>Amend the document to state that "Where apartments are proposed, they should provide a broad mix of dwellings, both in terms of the number of bedrooms and the net floorspace of the apartments. Small dwellings (i.e. studios and one bedroom apartments) should not predominate, and a significant proportion of three bedroom apartments should be provided wherever practicable".</p> <p>In order to provide further flexibility, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>

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HOU2	Ask Developments (238)	Object	<p>No specific justification is provided for the second criteria of Policy HOU2, which requires that 50% of any apartments should have a floor area of 57 sq m or more. The criteria is dangerously prescriptive, and should be applied flexibly, as some developers may be able to achieve two bedroom apartments in units of less than 57 sq m, meeting market demand and according with appropriate detailed development control standards.</p> <p>Each scheme should be assessed on its merits and judged according to the regeneration contribution it makes, not based on an arbitrary assessment of size.</p>	<p>57 sq m is based on the Housing Quality Indicators, developed by DEGW on behalf of the DTLR and the Housing Corporation in 2000. It is considered that units above this size are needed in order to avoid homogenous areas containing only small dwellings, that are only attractive to a very narrow sector of the population. Additionally larger units are more adaptable to changing needs.</p> <p>Notwithstanding this, the council proposes to delete the requirement for at least 50% of dwellings to be above 57 sq m, in order to provide greater flexibility. However, the reasoned justification has been amended to act as a guideline, rather than a requirement in the Policy.</p> <p>It is recognised there may be specific individual site circumstances that may justify an alternative approach, having regard to criteria A-H of UDP Policy H1, and the document has been amended to reflect this.</p>	<p>Delete the requirement for 50% of dwellings having to above 57sq m from the policy.</p> <p>Amend the reasoned justification (revised paragraph 4.31) to state that "the majority of apartments in new developments should normally have two or three bedrooms, with a floorspace and layout that makes them adaptable to changing needs (typically 57 square metres or above). Higher proportions of smaller apartments will need to be justified on a case by case basis ...".</p>
HOU2	Ask Developments (239)	Object	<p>Policy HOU2 will constrain higher density developments in the Regional Centre, undermining their viability, reducing their availability to meet demand from smaller households, and potentially reducing the amount of investment</p>	<p>Higher density schemes (which are focussed on smaller dwellings) undoubtedly have an important role to play in Salford's housing market, particularly in terms of providing a more affordable housing product within the Regional Centre, and</p>	<p>Amend the policy to remove requirements being expressed in the form of percentages.</p> <p>In order to provide further flexibility, amend the policy to state that "Alternative approaches on individual</p>

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			<p>available to support other essential infrastructure that will underpin the creation of sustainable residential and working mixed use communities.</p>	<p>helping meet the demand for smaller households.</p> <p>Although the council recognise that average household sizes are declining and the number of single person households is increasing, it is too simplistic to automatically equate this with a need for smaller dwellings. Many smaller households may require larger dwellings, for example to allow them to work from home, or because they require additional bedroom space for visiting children who may live permanently elsewhere. Equally, smaller households may choose to cohabit for social or financial reasons.</p> <p>The city council therefore consider that it is important that all new developments contribute to a balanced mix of dwellings in terms of size, in order to ensure that new developments are contributing towards helping to build sustainable communities. Developments should offer a choice of different units sizes (both in terms of number of bedrooms and new floorspace) to meet the needs of those who wish to live in the Regional Centre. The current provision and dwellings with extant permission are skewed towards the smaller end of the market, and this could work against the provision of sustainable, mixed</p>	<p>sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1”.</p>

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				<p>communities.</p> <p>It is recognised there may be specific individual site circumstances that may justify an alternative approach, having regard to criteria A-H of UDP Policy H1, and the document has been amended to reflect this.</p>	
HOU2	Ask Developments (240)	Object	<p>No quantitative evidence has been brought forward to justify a restriction on studio apartments of 15%.</p> <p>It appears to contradict the broader evidence based on national trends of a steadily increasing number of single person households and fails to take into account the economic context of the Regional Centre, the Knowledge Capital Initiative, and the influence of Manchester and Salford's student and graduate population on the economies of central Manchester and Salford.</p>	<p>The restriction on studios in the draft SPD was based upon a consideration of what is needed to build sustainable communities.</p> <p>It is considered that too many studio apartments would not help contribute towards a balanced mix of dwellings in terms of type and size (UDP Policy H1). The continuing reduction of dwelling sizes risks creating a dangerously skewed residential market within the city.</p> <p>The increasing dominance of small and very small dwellings in new apartments developments, and within the Regional Centre in particular, effectively excludes a large proportion of households from living there. This works against the provision of sustainable communities, instead leading to increasingly monotonous areas, a lack of social diversity, and households having to move out as their circumstances change in order to meet their housing needs.</p>	<p>Delete the maximum 15% restriction on studio developments. Revise policy to state that "Small dwellings (i.e. Studio and one bedroom apartments) should not predominate".</p> <p>Revise reasoned justification to recognise that small dwellings have an important role to play particularly in terms of providing a more affordable product, especially within the regional centre.</p> <p>Amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>

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				However, the council recognises that there may be occasions when it may be appropriate for more than 15% of dwellings to be in the form of studios, and has amended the policy to relate to preventing smaller apartments more generally from dominating.	
HOU2	Countryside Properties (Northern) Ltd (252)	Object	<p>Whilst the policy sets out the aims and aspirations of the Council, as set out in the Reasoned Justification, there is no market analysis to justify the stance being taken, which is of concern. By introducing a fixed floor area of 57 sq m, (613 sq ft) the Council is indirectly setting an open market value higher than may otherwise be required in the market.</p> <p>Two bed, three person units can be anything from 51 sq metres (550 sq ft) upwards, by insisting on 57 sq m the Council is increasing the selling price of such units and therefore restricting access to more affordable accommodation. The council should restrict the policy to targets.</p>	The concerns of Countryside Properties are noted. The city council intends to make the policy less prescriptive by removing the minimum percentage requirements, and also deleting the 50% requirement for units having to be above 57m <sup>2</sup> . The reasoned justification now refers to the need for apartments to be adaptable, and the 57m <sup>2</sup> figure is indicative.	<p>Delete the requirement for 50% of dwellings having to above 57sq m from the policy.</p> <p>Amend the reasoned justification (revised paragraph 4.31) to state that "the majority of apartments in new developments should normally have two or three bedrooms, with a floorspace and layout that makes them adaptable to changing needs (typically 57 square metres or above). Higher proportions of smaller apartments will need to be justified on a case by case basis ...".</p>
HOU2	Home Builders Federation (268)	Object	The first bullet point of this policy is not relevant to this section and should perhaps be relocated in policy HOU1	Disagree. The first bullet point in policy HOU2 states that a maximum of 15% of dwellings should be in the form of studios – this is related to the size of units rather than the type. However, this reference has been amended.	None.

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HOU2	Home Builders Federation (269)	Object	<p>This policy is too prescriptive and restrictive and is contrary to national guidance regarding housing mix. The delivery of a mix of housing types should be based on intelligent led Housing Market Assessment information whereby the mix of housing reflects the need and demand of the particular area.</p> <p>A flexible and pragmatic approach to delivering a mix of houses is required and should be applied on a site by site basis.</p>	<p>The approach taken in this policy is not contrary to national guidance regarding housing mix. Paragraph 2 of PPG3 states that local planning authorities should "provide wider housing opportunity and choice and a better mix in the size, type and location of housing than is currently available". It also advises that LPAs should ensure that "new developments help to secure a better social mix by avoiding the creation of large areas of housing of similar characteristics" (paragraph 10).</p> <p>However, the council has amended the policy to be less prescriptive, and to also recognise that there may be circumstances (particularly having regard to Criteria A-H of UDP Policy H1) where different size units to those set out in the policy may be more appropriate.</p>	<p>Amend the policy to seek:</p> <ul style="list-style-type: none"> <li>• The majority of new houses to have at least three bedrooms;</li> <li>• A broad mix of apartment sizes in terms of bedroom numbers and floorspace;</li> <li>• Small dwellings such as studios and apartments should not predominate with a significant proportion of three bedroom apartments to be provided wherever practicable.</li> </ul> <p>Additionally, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>
HOU2	McCarthy and Stone (295)  Peel Investments (North) Limited) (397)	Object	As no housing market assessment yet exists the policy is premature, and unjustified by any evidence base in respect of required unit size.	The city council has amended the reasoned justification to provide further justification to the policy, demonstrating that the policy is required in order to deliver the balanced mix of dwellings sought by both PPG3 and UDP Policy H1. Additionally the policy has been amended to be less prescriptive.	Amend the reasoned justification to further amplify the basis for the policy, and also amend the policy to be less prescriptive.
HOU2	Vanguard Textiles Ltd (347)	Object	The percentages quoted in this policy are not justified by any evidence.	The percentages in the policy were determined on the basis of (amongst other things) trying to create sustainable communities across the city, and as a response	Amend the policy to remove percentage requirements and state that: <ul style="list-style-type: none"> <li>• Majority of new houses to have at least three bedrooms;</li> </ul>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>to the large number of small dwellings coming forward and having extant planning permission. However it is considered that the inclusion of percentages is too prescriptive, and that they should therefore be removed from the Policy, whilst still retaining the overall principle of the policy consistent with UDP Policy H1.</p> <p>The council recognise that it is necessary to further explain the approach taken in Policy HOU2, and the reasoned justification has been amended accordingly.</p> <p>It is agreed that the policy should allow for an alternative approach if this can be clearly justified by specific individual site circumstances.</p>	<ul style="list-style-type: none"> <li>• Broad mix of apartment sizes in terms of bedroom numbers and floorspace;</li> <li>• Small dwellings such as studios and apartments should not predominate with a significant proportion of three bedroom apartments to be provided wherever practicable.</li> </ul> <p>Amend the reasoned justification to further amplify the approach. For example, include details of how recent developments and planning permissions have generally been characterised by small dwellings.</p> <p>In order to provide flexibility, amend the policy to state that "Alternative approaches on individual sites may be permitted where it can be clearly demonstrated by the applicant that there are specific circumstances that justify this, particularly having regard to criteria A-H of UDP Policy H1".</p>
HOU2	GONW (357)	Object	We cannot see how there is a clear and direct connection with UDP policy H1. Ranges regarding the size of new dwellings should have been set out in a UDP policy which should have been tested at the UDP inquiry.	<p>Policy H1 of the UDP states that all new developments should contribute towards a balanced mix of dwellings in terms of size. The draft SPD explains in greater detail what the city council understands by a balanced mix of dwellings in terms of size.</p> <p>It is not considered that the draft SPD introduces new policies that should be part of a Development Control Policies DPD. However the</p>	Redraft Policy HOU2 so that it is more clearly related to the principles of policy H1 of the UDP, and also recognises that alternative approaches to dwelling mix may be permitted where it can be clearly demonstrated that there are specific circumstances that justify this (particularly having regard to criteria A-H of policy H1).

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				council consider that it is necessary to better explain the links between the document and the UDP by stating in the revised policy that alternative approaches may be permitted where it can be clearly demonstrated that there are specific circumstances that justify this (particularly having regard to criteria A-H of policy H1).	
HOU2	Central Salford URC (484)	Object	Although the policy intentions are sound, it is not thought that the combination of restrictions proposed are the best or most effective way of achieving this. The mix of restrictions in the policy could create a scenario where developers are able to put together a scheme compliant with the policy, however unacceptable to the URC. For example, it would be possible to obtain permission for a scheme of 15% studios, 35% one bedroom flats and 50% small 58 square metre two bedroom flats.	Comments noted. The policy has been amended to place the emphasis on securing a broad mix of apartment sizes and avoiding a predominance of smaller apartments.	The city council, proposes to amend the policy so that it is less prescriptive.  Amend the policy to state that where apartments are being provided, the emphasis is on securing a broad mix of dwellings in terms of number of bedrooms and also net floorspace. Additionally, amend the policy to state that small dwellings should not predominate, and a significant proportion of three bedroom apartments should be provided wherever practicable.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Para 4.24	McCarthy and Stone (294)  Peel Investments (North) Limited (398)	Object	Paragraph 4.24 of the SPD states that Policy HOU 2 "Supplements Draft UDP Policy H1". On this basis the comments made in respect of Policy HOU 1 also apply to Policy HOU 2.	See council's response to paragraph 4.17 concerning Policy HOU1 (representations 293 and 396).	None.

## POLICY HOU3 – Replacement of Large Dwellings

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU3	United Utilities Property Solutions (45)	Object	<p>Replacement should be allowed provided that it is not detrimental to the site and its surrounding and contribute to meeting the housing needs of areas.</p> <p>Replacement of large dwellings with smaller may enhance the sustainable use of urban land. The term 'large' is imprecise, for instance, two-bedroom terraced property may better serve the needs of the local area housing market.</p>	<p>The city council consider that there are insufficient links between draft SPD Policy HOU3 and UDP Policy H1 to justify retaining the policy.</p> <p>UDP Policy DES1 (Respecting Context) does however state that new development will be required to respond to its physical context, respect the positive character of the local area in which it is situated, and contribute towards local identity and distinctiveness. Applications for the demolition of large dwellings will be treated on their merits on a case by case basis with regard being had to Policy DES1, and especially the impact on the character of an area, and the dwelling mix policies in this document.</p>	Delete the Policy from the document.
HOU3	Bellway Homes (95)	Object	Each application should be treated on its individual merits.	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.
HOU3	The Emerson Group (193)	Object	Redevelopment of the site of a large dwelling by dwellings of three bedrooms or more would not produce many new units, could be contrary to density controls, and in any case, would be controlled through Policy HOU1.	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.
HOU3	Barratt (Manchester) Ltd) (210)	Object	Any such policy should have been subject to proper scrutiny through the UDP process, although an alternative approach would be to require such proposals to be fully	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			justified in the context of the locality and the housing market.		
HOU3	Home Builders Federation (270)	Object	HBF objects to this unnecessary policy that is prescriptive and tantamount to social engineering.	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.
HOU3	McCarthy and Stone (296)  Peel Investments (North) Limited (399)	Object	Policy HOU 3 cannot supplement Draft UDP Policy H1 as Policy H1 makes no reference at all to the replacement of larger dwellings.	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.
HOU3	McCarthy and Stone (297)	Object	The policy directly contradicts the aspirations of Draft UDP Policy H3 which addresses housing improvement schemes.	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.
HOU3	GONW (359)  Peel Investments (North) Limited (400)	Object	It is considered that there are insufficient links between this policy and UDP policies.	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.
HOU3	Central Salford URC (485)	Observations	This policy will stop apartments being built in place of large houses at a time where a lack of 'executive' housing is holding back the City's economic growth. It is recommended that this policy is noted.	See above response to United Utilities Property Solutions (representation number 45).	Delete the Policy from the document.

## Chapter 5 – Providing Accessible Homes

### Policy HOU4 – Accessible Homes

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU4	Bellway Homes (96)	Object	The policy is unnecessary and a duplication of control that can be exercised through Building Regulations	The requirement for all homes to be built to the Lifetime Homes Standard is contained in Policy L4 of the Draft Regional Spatial Strategy for the North West. The Examination in Public process will consider the merits of such a requirement, and if it remains in RSS then it will become part of Salford's Development Plan, and would therefore be a requirement of developers. It is therefore considered that the policy contained in the draft SPD on accessible homes should be deleted, as it is unnecessary (and if such an approach cannot be justified through the Examination in Public process, potentially inappropriate).	Delete the Policy from the document.
HOU4	Dandara Ltd (181)	Object	Lifetime homes requirements on all dwellings would further impact on viability (when combined with HOU2) as it will generate a further increase in the size of apartments, increasing costs and impacting further on affordability. A proportion of dwellings should be designed to Lifetime Homes standard.	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.
HOU4	McCarthy and Stone (298)  Peel	Object	Policy HOU4 goes beyond the scope of Policy DES2 and is considered to introduce new and unduly onerous requirements that	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
	Investments (North) Limited (401)		would be more appropriately introduced through a DPD .		
HOU4	McCarthy and Stone (299)  Peel Investments (North) Limited (402)	Object	These requirements are unduly onerous and will have a detrimental impact on scheme design and densities achieved. The impact of such requirements is considered so great that they go beyond the scope of SPD, PPS12 and PPS1. There is no evidence base to support such onerous requirements across all developments.	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.
HOU4	North West Regional Assembly (459)	Support	The reference to the need for all dwellings in Policy HOU4 to be designed and constructed to Lifetime Homes standards supports policy L4 of the submitted draft RSS.	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.
HOU4	George Wimpey Manchester Ltd (148)	Object	A council has no powers, beyond Building Regulations, to impose standards of construction on schemes, and therefore all reference to 'Lifetime Homes', and 'Wheelchair Housing Standards' should be deleted. PPS1 states that "Planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements..".	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.
HOU4	The Emerson Group (194)	Object	The policy is too prescriptive and would have significant cost implications - achieving these standards has an impact on affordability. However if such a policy were introduced then it should be a percentage of all	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			dwellings (e.g. 10/20%).		
HOU4	Countryside Properties (Northern) Ltd (253)	Object	The use of Lifetime Homes is unnecessary and in any event Part M of the Buildings Regulations is sufficient. Similarly, Part M deals with wheelchair accessibility. The policy should be deleted.	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.
HOU4	GONW (360)	Object	It is considered that there are insufficient links between this policy and UDP policies.	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.
HOU4	Central Salford URC (486)	Support	This policy is consistent with the intentions of URC objectives and will enable people to remain in their properties should they become disabled. It will assist parents using pushchairs for their children and will ensure a minimum size of kitchens and bathrooms in new properties. It is recommended that this policy is supported.	See above response to Bellway Homes (representation number 96).	Delete the Policy from the document.

## Chapter 6 – Delivering Affordable Homes

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
General	Bellway Homes (108)	Observations	It is considered unnecessary to break the affordable housing section into so many individual 'policies'	Agree that the number of affordable housing policies should be reduced to provide greater clarity.	The document has been amended to include fewer affordable housing policies. There are now only 4 policies, instead of 8 as previously drafted.
General	ASK developments Limited (242)	Object	<p>The ability of the private sector to deliver the regeneration and economic development outcomes required of it by its public sector partners will be seriously prejudiced by the blanket requirement for affordable housing, on top of the other restrictions on dwelling size, and requirements for additional planning obligations imposed through the Housing and Obligations draft Supplementary Planning Documents.</p> <p>The need for affordable homes, whilst not challenged in principle, is not so pressing in the context of the inner areas of Salford, and in particular the Regional Centre, that regeneration should be put at risk. The HMRI is tackling affordability issues and the market is providing a range of more affordable house types, such as the Abito concept.</p>	<p>Agree in part that the requirement for affordable housing alongside other Planning Obligations and requirements may impact on the ability of the private sector to deliver regeneration. Draft SPD Policy HOU5 set a requirement for 20% of dwellings to be affordable on all sites of more than 1 ha, or accommodating 25 or more dwellings.</p> <p>The justification to this draft policy (Paragraph 6.7) recognised that high development costs mean a standard proportion of affordable dwellings will not always be appropriate – however it was stated that the costs to a developer will always effectively equate to them forgoing profit on 20% of dwellings. The city council recognises that a 20% requirement may not always be appropriate and has amended the document accordingly to make it clear that lower proportions may be acceptable in particular circumstances. A number of possible examples are included in</p>	Amend the document to state that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate. Examples are given in the policy of such circumstances, and one of these is “The financial impact of the provision of affordable housing combined with other planning obligations as set out in the Planning Obligations SPD would affect scheme viability”.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>the policy, one of which is where the financial impact of the provision of affordable housing combined with other planning obligations would affect scheme viability.</p> <p>Disagree that the issue of affordable housing is not so pressing in the inner areas / regional. There is a need city-wide for affordable housing, as evidenced by average house price to income ratios in all wards of the city exceeding a ratio of 3 as well as the overall objective of securing more mixed communities. The issue within the regional centre is one of high house prices compared to incomes, whereas in the rest of Central Salford there is a particular issue over low incomes.</p> <p>Some affordable housing will be provided through the Housing Market Renewal Initiative. However, it is considered that HMR and other sources outside of the planning system will only make a limited impact on the overall need for affordable housing.</p> <p>Agree in part that the market is providing a range of more affordable housing types (such as Abito). However these are generally small units, at the lower end of the market, and therefore cannot meet the needs of many households that</p>	

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				require affordable housing. Notwithstanding this, even to households on a moderate income many of the units being built in the regional centre (including Abito) are unaffordable to a large band of households.	
General	Salford Strategic Housing Partnership (249)	Observations	The Housing SPD recognises the fact that private developers will need to play a very significant part in providing affordable housing, for example through Section 106 agreements. Funding additional affordable housing through this type of mechanism will become particularly important in future.	Comments noted.	None
Various Policies	GONW (358)	Object	As regards SPD policies HOU5, HOU6, HOU7 and HOU8, HOU10 and HOU11 concerning affordable housing, the relevant UDP policies should have set the percentages of affordable housing to be sought (for example as a range) and information on the types of housing to be sought.	UDP Policy H4 is clear that affordable housing will be sought where there is a demonstrable lack of affordable housing to meet local needs. The draft SPD clearly identifies such a lack across the whole city, using a model produced by the Government, and seeks to meet that need in accordance with the UDP Policy. This approach is consistent with that taken by other local planning authorities in the North West in their Adopted SPDs.  It is recognised that some of the policies were inappropriately prescriptive, and they have been amended accordingly to ensure complete consistency with the UDP.	Amend the document to make some of the affordable housing policies less prescriptive.
General	Great Places Housing Group	Support	Great Places Housing Group wholeheartedly supports the City	Support Noted.	None.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
	(363)		<p>Council's objectives to maximize the development of new, high quality housing for sale and affordable accommodation in the City through the planning system.</p> <p>It is clear that the level and scale of new affordable housing required in the City cannot be met solely from the development of schemes funded by RSL's and the Housing Corporation. It is crucial that the private sector is engaged and plays a substantial part in the development of additional affordable housing.</p>		
General	Cllr Geoff Ainsworth (466)	Observations	What safeguards are in place to ensure that a developer will not simply recoup 'loss of profit' by increasing density of redevelopment?	The density of development will need to be consistent with the other policies of the document on mix and size, UDP Policy DES1 and criteria A-H of UDP Policy H1, amongst others. The need to generate additional profit to cross-subsidise the provision of affordable housing will not be an acceptable justification for inappropriate densities.	None.
General	Cllr Geoff Ainsworth (468)	Observations	Is it appropriate that Registered Social Landlords appear to be seen as the only vehicle for the delivery of affordable housing?	Agree that it may not always be appropriate for RSLs to be seen as the only vehicle for delivering affordable housing. The city council does however consider it important that any organisation providing affordable housing will need to be approved by the city council and that this will normally be an RSL, although it is recognised that other organisations (e.g. developers	<p>Amend the document to state that "In the case of social rented and shared ownership housing, the developer should construct the units and sell them to a suitable organisation approved by the city council (normally a Registered Social Landlord) ...".</p> <p>Insert the following text into the Policy Reasoned Justification: "The city council would encourage developers</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				themselves) may be able to deliver the affordable housing.	to bring forward affordable housing in partnership with the city council's lead Registered Social Landlords (RSLs), details of which are listed in Appendix B. However, schemes may also be developed in conjunction with other RSLs / organisations, although these must be approved by the city council". (Policy HOU4)
General	Cllr Geoff Ainsworth (469)	Observations	Where are the local definitions of affordability?	<p>It is not considered appropriate for the document to include a definition of affordability in relation to the value of accommodation. However, such details are included in the Affordable Housing Strategy which was recently published by the city council. The Affordable Housing Strategy will be an important consideration in the implementation of the guidance.</p> <p>The city council does however consider that it would be useful to define what is understood by affordable housing in terms of the type of units.</p> <p>It is not considered appropriate to include a further definition of affordability as this is already set out in policy H4 of the UDP (which the affordable housing policies in the SPD are linked). It is though recognised that a cross-reference to the definition in the UDP may be useful.</p>	<p>Amend the document to state that "For the purposes of Policy HOU3, the definition of affordable housing includes:</p> <ul style="list-style-type: none"> <li>• Social-rented housing;</li> <li>• Shared ownership;</li> <li>• Shared equity; and / or</li> <li>• Discounted market housing.</li> </ul> <p>Where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard that meets local needs and circumstances, the city council will consider other forms of provision to those listed above" (Policy HOU4).</p> <p>Make cross reference in the guidance to state that the document builds on the definition of affordable housing contained in the justification to UDP Policy H4 (paragraph 7.13). This states that "affordable housing is housing which meets the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing....</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
					The government define decent as one which is "wind and weather tight, warm and has modern facilities", and appropriate housing as housing "which meets the needs of a particular individual/households in terms of size, type and tenure".
General	Salford First / Great Places Housing Group (476)	Support	Affordability is obviously an increasing problem, as evidenced by the recent events at Chimney Pot Park. Policy aimed at securing access to new housing for as many people as possible, therefore has our total support.	Support noted.	None.
Policies HOU5 – HOU12	Central Salford URC (487)		<p>Main issues arising are:</p> <ol style="list-style-type: none"> <li>1) The housing needs of the current population;</li> <li>2) The impact on development interests;</li> <li>3) The ability of RSLs to fulfil their role in implementing the policy;</li> <li>4) Whether the 20% figure is too high; typically it will work out as a minimum of around £3000 per apartment (calculated by working out what would be the loss of profit on 20% of the scheme, and dividing it by the total number of apartments in the scheme);</li> <li>5) Whether the requirement for developers to provide financial information (Appendix D) is too onerous and inflexible, and will risk deterring developers from Salford;</li> <li>6) Is it right to rely on the</li> </ol>	<ol style="list-style-type: none"> <li>1) The council has used an ODPM affordable housing model that shows a need for 600 social rented units per annum. However it is recognised that rising house price to income ratios may indicate a need for intermediate housing, as well as social rented housing.</li> <li>2) Recognise that the 20% requirement may have an impact on development interests, and scheme viability may sometimes justify a lower proportion.</li> <li>3) The council recognise that bodies other than RSLs may be able or necessary to provide the affordable housing.</li> <li>4) The 20% requirement may be lowered where there is an impact on viability.</li> </ol>	<ol style="list-style-type: none"> <li>1) Amend the document to state the most appropriate type and mix of affordable housing will be determined having regard to need and local circumstances.</li> <li>2) Amend the document to state that a lower proportion of affordable units may be more acceptable where particular circumstances justify this.</li> <li>3) Amend the document to state that RSLs will usually be involved in the provision of affordable housing, although other bodies may be appropriate so long as they are approved by the council.</li> <li>4) Amend the document to state that a lower proportion of affordable units may be more acceptable where particular circumstances justify this.</li> <li>5) Amend the document to state that</li> </ol>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>developer providing the 'at cost' price of the apartments as the basis for the contributions rather than a defined sum or a sum linked to a publicly available measure – such as selling prices;</p> <p>7) Do RSLs have adequate financial and staff resources to purchase and manage the affordable housing provided by developers. In addition, whether the 'at cost' price of the market housing will be too high to be funded by Social Housing Grant;</p> <p>8) Should there be a clause in the policy to exempt area MX1/1 to be consistent with Manchester within the inner ring road area?;</p> <p>9) Will the implementation of the SPD will result in developers compromising on design quality or proposing overly dense schemes to recoup costs?; and</p> <p>10) What transitional arrangements need to be put in place for circumstances where, for example, land has been purchased without taking into account the cost implications of this policy.</p>	<p>5) Accept that open book appraisals may be too onerous and inflexible, but sufficient information should still be provided to inform discussions.</p> <p>6) At cost approach has been deleted from the document to provide greater flexibility.</p> <p>7) The document assumes that there will be no Social Housing Grant. Where RSLs do not have enough resources alternative organisations may take on the units, or the number of units will be reduced.</p> <p>8) Disagree. The policy applies to the whole of the city in order to ensure mixed communities, although there may be circumstances where the requirement is reduced or even waived.</p> <p>9) Low quality design and/or inappropriate densities will not be permitted.</p> <p>10) Recognise that there is a need for some transitional arrangements, to take into account where schemes are already well-developed.</p>	<p>developers will have to submit financial information sufficient to allow the council to determine the appropriate level of affordable housing.</p> <p>6) Developers to sell to RSLs at a discount sufficient to secure their involvement.</p> <p>7) Amend the document to state that a lower proportion of affordable units may be more acceptable where particular circumstances justify this.</p> <p>8) Amend the document to state that a lower proportion of affordable units may be more acceptable where particular circumstances justify this.</p> <p>9) Delete reference to having to achieve Scheme Development Standards. However amend the document to state that affordable units should be to the same standards as the market units. The design policies of the UDP will ensure design of a high quality.</p> <p>10) Amend the document to state that where a scheme was substantially developed before the adoption of the SPD, a lower proportion of affordable units may be acceptable.</p>

## Policy HOU5 – Provision of Affordable Housing

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU5	United Utilities Property Solutions (46)	Object	<p>The policy is onerous and the formula inappropriate.</p> <p>The policy should define what constitutes affordable housing.</p> <p>Price restrictions should not apply as they are arbitrary and may inhibit the delivery of affordable housing.</p>	<p>Agree in part.</p> <p>The council agree that the document should define what constitutes affordable housing. Therefore the council propose to amend it to set out such details.</p> <p>Additionally UDP Policy H4 defines affordable housing, and it is considered that a cross reference to this definition should be made in the revised document.</p>	<p>Amend the document to remove the 'at-cost' approach, and instead state that in the case of social rented and shared ownership housing, a developer should construct the units and then sell them to a suitable organisation approved by the city council (normally an RSL) at an agreed discount rate to secure their involvement (revised policy HOU4).</p> <p>Clarify that a lower proportion of affordable housing (than the 20% requirement), or a lower commuted sum, may be acceptable where material considerations indicate that this would be appropriate.</p> <p>Amend the SPD to state that "For the purposes of Policy HOU3, the definition of affordable housing includes:</p> <ul style="list-style-type: none"> <li>• Social-rented housing;</li> <li>• Shared ownership;</li> <li>• Shared equity; and / or</li> <li>• Discounted market housing</li> </ul> <p>Where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard that meets local needs and circumstances, the city council will consider other forms of provision to those listed above" (Policy HOU4).</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
					<p>Make cross reference in the document to state that the guidance builds on the definition of affordable housing contained in the justification to UDP Policy H4 (paragraph 7.13). This states that "affordable housing is housing which meets the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing.... The government define decent as one which is "wind and weather tight, warm and has modern facilities", and appropriate housing as housing "which meets the needs of a particular individual/households in terms of size, type and tenure".</p>
HOU5	Bellway Homes (97)	Object	The provision of affordable homes should be justified by an up to date Housing Needs survey and be the starting point for negotiations.	<p>The city council has assessed the need for affordable units across the city using an ODPM Affordable Housing Needs model contained in Housing Market Assessments Draft Practice Guidance (December 2005). This model has a base date of April 2006 and it is therefore considered to be up to date.</p> <p>The Draft Practice Guidance is clear that "Whilst it is possible to undertake more localised assessments using geo-coded data (where available) and information from <i>housing surveys</i>, partnerships should be aware that there are limits to the accuracy and robustness of estimates at smaller</p>	None.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				scales".	
HOU5	Bellway Homes (98)	Support with conditions	The thresholds of 1ha or 25 or more dwellings would appear reasonable, subject to need.	Agree with Bellway Homes that the thresholds in the draft SPD are reasonable. The thresholds used are the same as those set out in UDP Policy (H4) which has been subject to Public Examination. The UDP is clear that affordable housing will only be required where there is a demonstrable lack of affordable housing to meet local needs. The SPD supplements UDP Policy H4.	None.
HOU5	Bellway Homes (101)	Object	The policy provides no flexibility in terms of the differing types of affordability issues, with a presumption in favour of rented accommodation.	Agree that the draft SPD requirements (in HOU7 rather than HOU5) for all affordable housing to be in the form of social rented units (unless otherwise agreed with the city council) is too restrictive, and that the policy should have greater flexibility by making provision for other forms of affordable housing.	The document has been amended so that the preference for social rented units has been deleted. The most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (Policy HOU4).  If it is considered that social rented units are most appropriate, the document is now clear that a lower proportion of affordable housing may be appropriate where "It would not otherwise be possible to provide the affordable dwellings with a sufficient discount to enable the units to be purchased by an RSL" (Policy HOU3).
HOU5	Persimmon Homes (North West) (118)  Wilberton	Object	The SPD pays no regard to financial viability, and it will not be possible to deliver the quantum of affordable housing the Council require.	The city council agree that it should be made clear that a lower proportion of affordable units may be acceptable under particular circumstances, including having	The document has been amended so that policy (HOU3) now states state that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material

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	Properties (126)			regard to the financial viability implications of providing affordable housing.	considerations indicate that this would be appropriate. Examples are given in the policy of such circumstances, and include considerations of financial viability.
HOU5	Persimmon Homes (North West) (119)  Wilberton Properties (127)	Object	Challenge blanket application of 20% requirement - there is no evidence to support the provision of affordable housing close to the regional centre	<p>Disagree. It is considered that there is a need city wide for affordable housing.</p> <p>In terms of their being no evidence to support the provision of affordable housing close to the Regional Centre the council disagrees.</p> <p>It was determined by an Affordable Housing Working Group (established by the Housing and Planning Directorate at the city council) and an All Party Member Steering Group that wards which have a ratio of above 3 have an affordability issue. Average house prices to average household income exceed 3 in all wards of the city. Although it is recognised that mortgage providers often lend at ratios exceeding this, the city council do not want to encourage unsustainable lending. It is also important that Regional Centre accommodation is not restricted solely to those on high incomes in order to support the development of mixed communities.</p> <p>In particular circumstances it may be that a very high level of</p>	Amend the document to state that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate. Examples are given in the policy of such circumstances (revised policy HOU3).

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				affordable housing in the immediate area may mean that the requirement could be reduced.	
HOU5	Vermont Developments (134)  George Wimpey Manchester Ltd (149)  Vanguard Textiles Ltd (348)	Object	No analysis of why 20% is necessary to meet identified need and how this has been informed by the Housing Needs Assessment.	<p>The council disagree that there is no analysis of why 20% is necessary to meet identified need. Paragraphs 6.3 and 6.4 of the draft SPD set out the justification to the requirement and state that it is based on the need for realism (i.e. recognising that Planning cannot achieve the need for 600 affordable units per annum as identified by the Housing Needs Assessment) and the need to build sustainable communities where there are a good mix of dwellings.</p> <p>The council consider that there is perhaps a need for a clearer and more detailed explanation for why the 20% figure is most appropriate, and the reasoned justification has been amended accordingly (now Policy HOU3).</p>	<p>Amend the document to outline that there are a number of ways in which high quality affordable housing will be delivered in order to meet the need for around 600 affordable units per annum. However, it is considered that sources outside of the planning system will only make a limited impact on the overall need for affordable housing. Therefore the planning system has an important role to play in delivering affordable housing in Salford.</p> <p>It will be important to ensure that new housing schemes contribute to mixed communities and build in a variety of tenures. At the same time it needs to be recognised that the planning system cannot solve the problem of affordability on its own, and that excessive requirements can affect the viability of new development. Consequently, a balance needs to be found between maximising the provision of affordable housing through the planning system and ensuring the city's regeneration are not discouraged in any way. The provision of 20% affordable housing in new developments is considered to reflect an appropriate balance between these factors.</p>

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					Even with a 20% requirement on all sites above the size thresholds, it is unlikely that the need will be met. However, it is felt that a higher figure would be unrealistic given development costs and sales prices within the city. Notwithstanding this, amend the document to also note that there will be circumstances where a lower proportion of affordable housing may be appropriate.
HOU5	Vermont Developments (135)  George Wimpey Manchester Ltd (150)  Vanguard Textiles Ltd (349)	Object	There should be a more flexible approach to the affordable housing requirement which respond to the different housing market areas that operate within the LA areas. We believe that there are inner, less affluent parts of the city where the council should not be seeking affordable housing, and that there are more suburban, affluent areas where affordable housing may be appropriate.	Agree in part that there is a need for a more flexible approach to the affordable housing requirement. However the city council does not agree that there is not a need for affordable housing in the inner less affluent areas (generally Central Salford).  Affordability is an issue across the city. The issue in Central Salford is one of low household incomes whereas in the more 'suburban and affluent areas' it is high house prices. However the impact is the same in terms of households not able to access decent and affordable accommodation.  It was determined by an Affordable Housing Working Group and an All Party Member Steering Group that wards which have a average house price to average household income of ratio of above 3 have an affordability issue. Average house prices to average household	Amend the document to state that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate. Examples are given in the policy of such circumstances (policy HOU3).

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				<p>income exceed a ratio 3 in all wards of the city.</p> <p>However, in order to provide more flexibility it may be that in particular circumstances a lower proportion of affordable housing may be appropriate.</p>	
HOU5	<p>Vermont Developments (136)</p> <p>George Wimpey Manchester Ltd (151)</p> <p>Vanguard Textiles Ltd (350)</p>	Object	Examples of exceptions (i.e. where the 20% requirement may be reduced) should be incorporated into the policy text instead of in para 6.7.	The city council agrees that it should be made much clearer in the policy that a lower proportion of affordable units may be acceptable under particular circumstances.	The document has been amended so that policy (HOU3) now states that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate. Examples are given in the policy of such circumstances.
HOU5	George Wimpey Manchester Ltd (152)	Object	Policy HOU5 should confirm it is not necessary to involve an RSL in the provision of affordable housing as is made explicitly clear in para 34 of Circular 6/98 which states that "Local Planning authorities should not prescribe which partners developers should use to deliver the affordable housing, but rather they should aim to ensure that arrangements will deliver the objectives of the policy as set out in the local plan"	Agree that Circular 6/98 is explicit that policy should not prescribe which partners developers should use to deliver the affordable housing. The city council does however consider it important that any organisation will need to be approved by the city council and that this will normally be an RSL, although it recognises that other organisations (e.g. developers themselves) may be able to deliver the affordable housing.	<p>The document has been amended so that Policy HOU4 (Type of Affordable Housing) states: "In the case of social rented and shared ownership housing, the developer should construct the units and sell them to a suitable organisation approved by the city council (normally a Registered Social Landlord) ...".</p> <p>The following text has been inserted into the Reasoned Justification to the policy to state that: "The city council would encourage developers to bring forward affordable housing in partnership with the city council's lead Registered Social Landlords (RSLs),</p>

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					details of which are listed in Appendix B. However, schemes may also be developed in conjunction with other RSLs / organisations, although these must be approved by the city council".
HOU5	George Wimpey Manchester Ltd (153)	Object	<p>There is no locus in planning guidance for any local planning authority to determine land values nor the transfer cost of dwellings to a third party.</p> <p>The inclusion of the references to free land in the Plan is in conflict with the advice in Circular 1/97 and 6/98 and should be deleted.</p>	<p>The document has been amended to remove the requirement for dwellings to be transferred at a specific cost. The emphasis is now on providing sufficient discount for the dwellings to be affordable and, where relevant, enable the units to be purchased by an RSL.</p> <p>The reference to land being transferred to the city council at no cost (in Policy HOU7) has been deleted from the SPD.</p>	Amend the document to state that in the case of social rented and shared ownership housing, the developer should construct the units and sell them to a suitable organisation approved by the city council (normally a RSL) at an agreed discount rate sufficient to secure their involvement.
HOU5	George Wimpey Manchester Ltd (154)	Object	The draft SPD suggests that an 'open book' exercise will be undertaken in all cases where the RSL is unable to afford the 'at cost' price. It is a matter wholly beyond the remit of a local planning authority to determine what an acceptable land value or a developer's profit margin is.	The city council agrees that the 'open book' exercise would not always be inappropriate and the emphasis is now on developers providing sufficient information to inform discussions. The draft SPD does not seek to identify an appropriate profit margin for developers.	Amend the document to state that a reduced proportion of affordable housing may be appropriate where a development would become unviable. "In such circumstances, the evidence provided by the developer should include a financial statement that has been professionally certified.
HOU5	George Wimpey Manchester Ltd (155)	Object	The proposed equation is unworkable given the definition of 'the number of dwellings normally' required by the policy does not exist and the purchase price that the RSL 'can afford' is impossible to define sufficiently in order to provide any degree of consistency in the application of this equation.	It is agreed that the formula would be too prescriptive and that more flexibility is required. The policy has been amended accordingly.	None as a result of this representation, although the formula and at-cost approach have been deleted.
HOU5	George	Object	The percentage of affordable	The 20% requirement for affordable	Amend the document to provide

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	Wimpey Manchester Ltd (158)		housing being sought should be in line with housing needs and consider site viability and any other regeneration benefits that the scheme may provide.	housing is based on the affordable housing need in the city. Paragraphs 6.3 and 6.4 of the draft SPD set out the justification to the requirement and state that it is based on the need for realism (i.e. recognising that Planning cannot achieve the need for 600 affordable units per annum as identified by the Housing Needs Assessment) and the need to build sustainable communities where there are a good mix of dwellings.  The council however consider that there is the need to more clearly explain the 20% figure, and to recognise that site viability and other regeneration benefits may be a consideration that justifies a lower proportion in individual circumstances.	further justification for the 20% requirement. Clarify that there is a need for 600 dwellings per annum but that it is unlikely that the planning system (and other sources of affordable housing) will be able to meet this need. It is not considered that a higher requirement is appropriate due to the impact this will have on viability and regeneration. A 20% requirement seeks to provide a balance between various factors.  Notwithstanding this, amend the document to also note that there will be circumstances where a lower proportion of affordable housing may be appropriate. Examples of when this may be appropriate include the impact on scheme viability, or that the inclusion of affordable housing would prejudice the achievement of other important planning objectives.
HOU5	Royal Mail (176)	Object	The inclusion of a paragraph that identifies potential scenarios in which there is an over supply of affordable housing in a certain area and therefore the inclusion of additional affordable housing would not be required, would be welcomed.	The council considers that in areas where there is an oversupply of affordable housing, then the affordable housing requirement could be reduced.	Amend the document to state that a lower proportion of affordable housing, or a lower commuted sum, may be permitted where material considerations indicate that this would be appropriate. Such circumstances could include, for example, where "there is a very high level of affordable housing in the immediate area" (policy HOU3).
HOU5	The Emerson Group (195)	Object	The model on which need is based makes a lot of assumptions, whilst the need for affordable housing is not as great so as to warrant early implementation of such a policy (in	In assessing affordable housing need the city council has used the model / methodology contained in the ODPM December 2005 "Housing Market	None.

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			relation to house price to income evidence).	Assessments: Draft practice guidance".  The council has followed the steps set out in the guidance in full, and has used the data sources set out on page 39, table 5.3. The guidance is clear that where estimates are used, "these should be set out in a clear and transparent manner". In Appendix C of the draft SPD the council has done this. The scale of need identified is high, justifying early implementation of the policy.	
HOU5	The Emerson Group (196)	Object	The provision of affordable housing should be based on a site by site basis dependent upon the circumstances and demonstrable requirements of an area.	Agree in part. The council considers that a 20% requirement should be applied to all developments above the set thresholds identified in Policy H4 of the UDP. However it is acknowledged that 20% may not be appropriate on all sites across the city, and that the document should be clearer that a lower proportion of affordable housing may be permitted where material considerations indicate that this would be appropriate. This approach would better ensure that the circumstances and requirements of each site are more effectively taken into account.	Amend the document to state that a lower proportion of affordable housing, or a lower commuted sum, may be permitted where material considerations indicate that this would be appropriate " (policy HOU3).
HOU5	Vermont Developments (197)	Support	The way in which "at cost" is calculated is considered reasonable	Support noted. However the 'at-cost' price approach has been deleted.	None.
HOU5	Vermont Developments (198)	Object	Why are the words "or less" included in the policy (in relation to the at cost price)? These words should be deleted.	The words 'or less' were included in the draft SPD to encourage developers to provide dwellings to RSLs at below cost price – it was	The at-cost approach has been deleted from the document.

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HOU5	Barratt (Manchester) Ltd (211)	Object	The affordable housing requirement should be based on a HMA, which would also consider Salford in the context of the neighbouring authorities.	not a requirement.  Disagree. The council has used a ODPM needs model contained in Housing Market Assessment draft Practice Guidance to assess the affordable housing requirement for the city. The steps set out in this guidance for assessing need have been followed in full by the city council.  The context of neighbouring authorities has been taken into account, with this informing the 20% figure to ensure that Salford is not requiring more affordable housing than its neighbours.	None.
HOU5	Barratt (Manchester) Ltd (212)	Object	The requirement for each affordable home to be sold 'at cost' to a registered social landlord is not considered to be in accordance with national planning guidance which allows alternative methods of achieving affordable housing provision. It is also inconsistent with the flexibility that Policy HOU7 purports to offer.	Agree that it may not always be appropriate for RSLs to be the only vehicle for delivering affordable housing. The city council does however consider it important that any organisation will need to be approved by the city council and that this will normally be an RSL, although it is recognised that other organisations (e.g. developers themselves) may be able to deliver the affordable housing.	Amend the document to state that "In the case of social rented and shared ownership housing, the developer should construct the units and sell them to a suitable organisation approved by the city council (normally a Registered Social Landlord) ...".  Insert the following text into the Policy Reasoned Justification: "The city council would encourage developers to bring forward affordable housing in partnership with the city council's lead Registered Social Landlords (RSLs), details of which are listed in Appendix B. However, schemes may also be developed in conjunction with other RSLs / organisations, although these must be approved by the city council". (revised Policy HOU4)
HOU5	Eccles Masonic	Object	The blanket requirement for	Agree in part that the requirement	Amend the text to state that a lower

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	Hall Ltd (221)		affordable housing could have an adverse effect on the rate of development outside of the Regional Centre and Chapel Street area (especially in the areas where there is already a large amount of lower priced housing), where property values are lower and the viability of sites could become much more marginal with a requirement for 20%.	<p>for 20% affordable housing may have an impact on scheme viability.</p> <p>However, the council consider that as a starting point a 20% requirement should be applied to all developments above the set thresholds identified in Policy H4 of the UDP. It is though acknowledged that 20% may not be appropriate on all sites across the city, and that the document should be clearer that a lower proportion of affordable housing may be permitted where material considerations indicate that this would be appropriate. This approach would better ensure that the circumstances and requirements of each site are better accounted for.</p>	<p>proportion of affordable housing, or a lower commuted sum, may be permitted where material considerations indicate that this would be appropriate " (policy HOU3). Such circumstances could include "the financial impact of the provision of affordable housing combined with other planning obligations as set out in the Planning Obligations SPD would affect scheme viability".</p> <p>Include in the reasoned justification that the main situation where a reduced proportion of affordable housing or a lower commuted sum may be appropriate, is likely to be where a development would otherwise become unviable. In such circumstances, the evidence provided by the developer should include a financial statement that has been professionally certified.</p>
Would \a	Eccles Masonic Hall Ltd (222)	Object	The policy could result in Salford losing housing investment to places like Manchester, where no such policy is in place	PPG3 is clear that "Where there is a demonstrable lack of affordable housing to meet local needs - as assessed by up-to-date surveys and other information - local plans and UDPs should include a policy for seeking affordable housing in suitable housing developments" (paragraph 14). The council have demonstrated that there is a need for affordable housing and so should be seeking to address this need. Ignoring the issue will only lead to affordability problems worsening.	None.

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				The high overall demand for housing within the sub-region, combined with the Regional Spatial Strategy's housing provision figures and spatial framework, will help to ensure that reasonable requirements for affordable housing do not result in Salford being unable to meet its housing requirement.	
HOU5	ASK Developments Limited (232)	Object	There is a need for justification for the 20% minimum figure and for the figure to be tested through the Development Plan Process.	<p>The council disagree that there is no justification as to why 20% is necessary to meet identified need. Paragraphs 6.3 and 6.4 of the draft SPD set out the justification to the requirement and state that it is based on the need for realism (i.e. recognising that Planning cannot achieve the need for 600 affordable units per annum as identified by the Housing Needs Assessment) and the need to build sustainable communities where there are a good mix of dwellings.</p> <p>However, it is considered that additional justification would clarify the need for and purpose of the policy, and the clear links to the UDP.</p> <p>It is not considered necessary for the 20% requirement to be tested through the DPD process. The UDP states that an 'element' of affordable housing should be provided where there is a lack of affordable housing to meet local</p>	<p>Amend the document to outline that there are a number of ways in which high quality affordable housing will be delivered in order to meet the need for around 600 affordable units per annum. However, it is considered that sources outside of the planning system will only make a limited impact on the overall need for affordable housing. Therefore the planning system has an important role to play in delivering affordable housing in Salford.</p> <p>It will be important to ensure that new housing schemes contribute to mixed communities and build in a variety of tenures. At the same time it needs to be recognised that the planning system cannot solve the problem of affordability on its own, and that excessive requirements can affect the viability of new development. Consequently, a balance needs to be found between maximising the provision of affordable housing through the planning system and ensuring the city's regeneration are</p>

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				needs. This document expands on what an 'element' of affordable housing is.	<p>not discouraged in any way. The provision of 20% affordable housing in new developments is considered to reflect an appropriate balance between these factors.</p> <p>Even with a 20% requirement on all sites above the size thresholds, it is unlikely that the total need will be met. However, it is felt that a higher figure would be unrealistic given development costs and sales prices within the city. Notwithstanding this amend the document to also note that there may be circumstances where a lower proportion of affordable housing may be appropriate.</p>
HOU5	ASK Developments Limited (243)	Object	'Other planning obligations' are considered as a separate issue to affordable housing whereas clearly any specific project has a defined ability to subsidise City Council imposed items which include all S106 linked items.	<p>Agree that affordable housing should be considered alongside other planning obligations. The city council has produced a draft Planning Obligations SPD and this includes a cross reference to the requirement for affordable housing .</p> <p>The council agree however that the document should be clearer about the cumulative impact of planning obligations on scheme viability, and this is now included in Policy HOU3.</p>	<p>Amend the document to state that a lower proportion of affordable housing or a lower commuted sum may be permitted where material considerations would indicate that this is appropriate. Such circumstances could include for example "The financial impact of the provision of affordable housing, combined with other planning obligations as set out in the Planning Obligations SPD would affect scheme viability" (policy HOU3).</p> <p>Include in the reasoned justification that the main situation where a reduced proportion of affordable housing or a lower commuted sum may be appropriate, is likely to be where a development would otherwise become unviable. In such</p>

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					circumstances, the evidence provided by the developer should include a financial statement that has been professionally certified.
HOU5	ASK developments Limited (244)	Object	<p>Where projects cannot deliver the target affordable housing content then policy usually makes available to the developer a means of demonstrating that the project offers the maximum reasonable proportion of affordable housing, whilst still retaining the viability of the project.</p> <p>One of the key components of a viability assessment is usually an agreement as to the profit that a developer might expect, given the risk/reward profile of the opportunity. The SPD moves away from this model by seeking to generate the affordable housing subsidy not from the land component, but by the developer forgoing profit in relation to the affordable housing content. Specifically that the affordable content will be delivered at cost with no profit component.</p> <p>Is it reasonable to expect the developer to subsidise the affordable content from profit? For example, assuming an industry standard 20% return on cost for a typical project; if 20% of the scheme delivered no profit, and the remainder of the site were to be pinned at 20% return; then overall</p>	<p>Agree that it would be useful to recognise that the opportunity should be given to developers to demonstrate that a development offers the maximum amount of affordable housing whilst still retaining viability, and this may justify a proportion lower than 20% in some circumstances.</p> <p>The council considers that it is reasonable to expect a developer to assist in providing affordable housing. Where no Housing Corporation funding is available the affordable housing should be funded by the developer, and this will obviously have an implication on profit. However, developers should have the opportunity to provide a lower proportion of affordable housing where the requirement will make viability problematic.</p> <p>It is agreed that the "at-cost" approach should be deleted.</p>	<p>Amend the document to state that a lower proportion of affordable housing or a lower commuted sum may be permitted where material considerations would indicate that this is appropriate.</p> <p>Amend the reasoned justification to revised policy HOU3 to state that "there will be circumstances where a lower proportion of affordable housing may be appropriate and some examples of this are listed in the policy. It will be the responsibility of developers to demonstrate to the satisfaction of the city council that such circumstances exist, and that the provision of affordable housing is still being maximised albeit at a lower level".</p> <p>Delete the "at-cost" approach, and place the emphasis on delivering units at a cost affordable to RSLs or alternative providers (now in HOU4).</p>

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			the project would deliver only 16% profit on cost. This then directly affects the viability of the project, which as a consequence may generate funding difficulties; with funders demanding higher rates of interest and imposing more onerous lending terms. In the worst case scenario, funding difficulties may then affect project delivery.		
HOU5	Countryside Properties (Northern) Ltd (254)	Object	The requirement to sell, at cost, to a RSL is contrary to Circular 6/98, which clearly allows for alternative delivery mechanisms such as low-cost market housing. There should be no requirement to sell to an RSL, as market discounting to the cost price and appropriate covenants to maintain the discount in perpetuity would also deliver affordable units.	The council agrees that the requirement to involve an RSL in the provision of the affordable housing is contrary to advice in Circular 6/98. Therefore the council consider that although the involvement of RSLs in schemes is encouraged this cannot be a requirement. Additionally in some circumstances it is now recognised that shared equity schemes (including where equity is held in a property through a land change / covenant) and discounted market housing may be appropriate. Alternatively where a developer proposes an innovative way of providing affordable housing then the council will consider this.	Amend the document to state that the city council would encourage developers to bring forward affordable housing in partnership with the city council's lead Registered Social Landlords, although schemes may also be developed in conjunction with other RSLs / organisations subject to council approval (paragraph 5.17).  Also add reference to; the option for shared equity schemes; discounted market housing; and innovative approaches proposed by developers being suitable in particular circumstances.
HOU5	Countryside Properties (Northern) Ltd (255)	Object	In relation to the 20% of units being affordable, it should be made clear that this is 20% of the proposed mix. If elements of that mix are not required by a robust needs based assessment, they should not be requested to contribute to the overall total.	Agree in part that the type, size and mix of units should be based on need. However, it is considered that the 20% should apply to the whole development rather than each individual element, as the mix of a scheme should reflect the demand for different types of affordable housing as well as different types of	Amend the document to state that the type, size and mix of affordable housing to be provided should be agreed in negotiation with the city council, having regard to; securing mixed communities and greater diversity in the housing stock; the existing supply of affordable housing within the local area; the

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			If the Council were to insist on a straight 20% of the overall mix, then a mechanism needs to be introduced which allows for re-distribution of the 'at cost' discount. For example, if there is no identified need for one bed apartments, but they form part of the mix, then in the first instance we would argue they should not be included in the calculation of affordable units. Failing that, the 'at cost' discount could be re-distributed into the delivery of other units.	market housing in order to deliver sustainable communities.  The "at-cost" approach has now been deleted, with the emphasis instead on negotiation and delivering the affordable housing at an appropriate cost (e.g. to secure the involvement of an RSL).	characteristics of the households in need of affordable housing; and local house prices.  Delete the "at-cost" approach and emphasise in Policy HOU4 the need to deliver, through negotiation, any social rented or shared ownership housing at a discounted rate sufficient to secure the involvement of an RSL or other approved organisations, or any shared equity housing at a price to match the needs of those who would not be able to afford equivalent open-market housing.
HOU5	Countryside Properties (Northern) Ltd (256)	Object	A more robust assessment of affordable housing need is necessary.	In assessing affordable housing need the city council has used the methodology contained in the ODPM December 2005 "Housing Market Assessments: Draft practice guidance".  The council has followed the steps set out in the guidance in full, and have used the data sources set out on page 39, table 5.3. The guidance is clear that where estimates are used, "these should be set out in a clear and transparent manner". In Appendix C the council has done this.	None.
HOU5	Home Builders Federation (271)	Object	The level of affordable housing has an impact on viability and should be determined in negotiation with developers on a site by site basis.	The council considers that as a starting point a 20% requirement should be applied to all developments above the set thresholds identified in Policy H4 of the UDP. It is though acknowledged	Amend the document to state that a lower proportion of affordable housing, or a lower commuted sum, may be permitted where material considerations indicate that this would be appropriate" (policy HOU3). Such

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				that 20% may not be appropriate on all sites across the city, and that there is a need to clarify that a lower proportion of affordable housing may be permitted where material considerations indicate that this would be appropriate, which may include where the overall impact of planning obligations would compromise scheme viability. This approach would better ensure that the circumstances and requirements of each site are properly taken into account.	<p>circumstances could include “the financial impact of the provision of affordable housing combined with other planning obligations as set out in the Planning Obligations SPD would affect scheme viability”.</p> <p>Include in the reasoned justification that the main situation where a reduced proportion of affordable housing or a lower commuted sum may be appropriate, is likely to be where a development would otherwise become unviable. In such circumstances, the evidence provided by the developer should include a financial statement that has been professionally certified.</p>
HOU5	<p>McCarthy and Stone (300)</p> <p>Peel Investments (North) Limited (403)</p>	Object	<p>The SPD does not take account of issues raised by the UDP Inspector into Policy H4. In particular the SPD does not:</p> <ul style="list-style-type: none"> <li>• satisfy the clear requirements of Paragraph 9b of Circular 6/98 to indicate how many affordable homes need to be provided in the plan area;</li> <li>• provide sufficient information for developers and the public;</li> <li>• provide the Council with the basis upon which to negotiate for affordable homes.</li> <li>• consider need through the development plan system;</li> <li>• have the formal status or weight of the development plan</li> </ul>	<p>Disagree that the draft SPD does not take account of the UDP Inspector's comments with regards to Policy H4. In terms of the requirements of paragraph 9b of Circular 6/98, the council has indicated how many affordable homes need to be provided throughout the plan area (603 per annum between 2006-16), and has set a target of 20% on all housing developments above set thresholds. It is considered that the guidance provides greater clarity to developers and adds detail to Policy H4 of the UDP.</p> <p>It is recognised that informal guidance (which the city council now intends to adopt the document</p>	<p>Amend the document (justification to revised policy HOU3) to recognise that there are a number of ways in which high quality affordable housing will be delivered in order to meet the need for around 600 affordable units per annum. These include improving existing housing. However, they will make only a limited impact on reducing the overall need for affordable housing.</p> <p>The planning system therefore has an important role to play in delivering affordable housing in Salford. Even with a 20% requirement on all sites above the size thresholds, and the contribution from other sources, it is unlikely that the overall need will be met. However, it is felt that a higher</p>

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			<p>Fundamentally, the Inspector identifies in paragraph 7.69 that in reaching a conclusion on the actual number of affordable homes or an appropriate target level, links need to be made with other housing policies that could have an impact on the level of provision. These include indicative targets for allocation sites within policy H9, which would lead then to a clearer understanding of expectations from windfall sites. The Inspector also recognises that Policies H3 and H5 also have the potential to make a contribution to the supply of affordable housing.</p>	<p>as) does not have the formal status or weight of the Development Plan, or even an SPD. However the guidance note will be a material consideration in determining planning applications in terms of being adopted council policy.</p> <p>Accept that consideration should be given to the potential from other sources of affordable housing (i.e. those outside of the planning system). It is not however considered necessary to include indicative targets for those sites identified within policy H9. These sites (which do not already have planning permission) will be subject to the same requirements as windfall sites.</p>	<p>requirement in new developments would be unrealistic given development costs and sales prices within the city.</p> <p>Notwithstanding this, also amend the document to recognise that there will be circumstances where a lower proportion of affordable housing may be appropriate.</p>
HOU5	<p>McCarthy and Stone (301)</p> <p>Peel Investments (North) Limited (404)</p>	Object	<p>A blanket 20% requirement of entirely social rented accommodation is objected to. In setting the 20% target for all residential sites, the Housing SPD takes no account of other sources of affordable housing supply, as detailed in the Housing Strategy, and has relied solely on a limited reassessment of the housing waiting list, the inadequacies of which will be commented on later in this submission.</p> <p>The Inspector was very clear in paragraph 7.77 that "pending the outcome of further research and the publication of (at least) SPD, the</p>	<p>UDP Policy H4 is clear that affordable housing will be sought where there is a demonstrable lack of affordable housing to meet local needs. The draft SPD clearly identifies such a lack across the whole city, using a model produced by the Government, and seeks to meet that need in accordance with the UDP policies. This approach is consistent with Government guidance and regulations on the role of SPDs.</p> <p>It is however agreed that a blanket 20% requirement for entirely social rented accommodation is too prescriptive, and that alternative</p>	<p>Amend the document to state that "a lower proportion of affordable housing, or a lower commuted sum, may be permitted where material considerations indicate that this would be appropriate " (policy HOU3).</p> <p>Amend the document to state that the type, size and mix of affordable housing to be provided should be agreed in negotiation with the city council, having regard to; securing mixed communities and greater diversity in the housing stock; the existing supply of affordable housing within the local area; the characteristics of the households in need of affordable housing; and local</p>

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			<p>Council has no basis upon which to negotiate the 'element'. The Inspector goes on to advise the Council in paragraph 7.80 to "define what it means by 'an element' in a Development Plan Document". This Housing SPD is not a Development Plan Document.</p> <p>On this basis, Policy HOU5 is inappropriate for inclusion within the SPD as it contravenes the Inspectors advice, and is contrary to PPS12 in that it introduces new policy, not supported by an Adopted UDP policy, and is not based on an a robust evidence base as recommended by the Inspector.</p> <p>As part of the evidence base to support setting an overall affordable housing target, the City Council will need to complete its Housing Market Assessment, and assess all sources of housing supply as recommended by national guidance.</p>	forms of affordable housing should be allowed for, as should a lower proportion if there are clear material considerations that indicate this would be appropriate.	house prices.
HOU5	McCarthy and Stone (302)  Peel Investments (North) Limited (405)	Support with conditions	Further guidance on how the 'at cost' price is likely to compare with what RSLs can actually pay is necessary in order to provide clarity and prevent protracted negotiations in the future.	The city council has deleted reference to the 'at-cost' approach from the document.	Amend the document to state that instead of developers selling units 'at-cost' to RSLs, developers should provide units to RSLs or other approved organisations at a discount sufficient to secure their involvement.
HOU5	McCarthy and Stone (303)	Object	The at cost price would be subject to detailed debate and would	Agree that the at-cost approach is insufficiently flexible. However,	Amend the document to delete the 'at-cost' approach. Instead the

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	Peel Investments (North) Limited (406)		necessitate open book appraisals and independent verification of figures to resolve areas of dispute. This level of detail or approach is not supported by national policy or the adopted UDP.	developers may still be required to submit some independently audited financial information to inform negotiations.	guidance should state that as opposed to selling units to RSLs at cost price, developers should provide units to RSLs (or other bodies approved by the city council) at a discount sufficient to secure their involvement.  Delete requirement for developers to provide an open book development appraisal. Instead amend the document to state that where it is considered a lower proportion of units should be provide (i.e. less than 20%), then the developer would have to submit evidence to demonstrate that particular circumstances exist. The evidence provided by the developer should include a financial statement that has been professionally certified.
HOU5	Mr C Rustage (373)  Dain Properties Ltd. (375)  Chapel Invest Holdings Ltd (378)  Knight Frank LLP (379)	Object	Policy that insists upon a proportion of affordable housing on all development sites above the relevant thresholds may not be appropriate in planning terms and may be contrary to government guidance about creating "mixed communities". For example, it may not be appropriate to provide affordable housing in an area where there is an over-concentration of affordable type / below average market value housing already.	Agree in part. In the vast majority of circumstances, it will be appropriate to provide affordable housing and this will support sustainable communities. However, it is agreed that the document should be revised to explain that very high levels of affordable housing in the immediate area could justify a lower level of affordable housing provision, although any such decision would have to have regard to the level of need for affordable housing in the area.	Amend the document to state that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate. Such circumstances could include, for example, where: "There is a very high level of affordable housing in the immediate area"; and "There are low house prices in the immediate area compared to average incomes" (revised Policy HOU3).
HOU5	David Wilson Estates (445)	Object	Policy HOU5 is too limited in its scope. Leading edge developers are now seeking to work with local	Agree that it may not always be appropriate for RSLs to be the only vehicle for delivering affordable	Amend the document to state that "In the case of social rented and shared ownership housing, the developer

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			<p>authorities, ALMOs, housing associations and other partners to provide appropriate forms of housing tenure, sustainable into the long term. This requires flexibility for developers to introduce new ways to provide good quality housing as part of the affordable requirement.</p> <p>The stringent "provide at cost" is nice in theory but results in the ghettos of dismal poor quality rented housing common to parts of Salford, as opposed to engendering greater tenant and part-owner civic pride in their homes and neighbourhood. This policy should be more positive and recognise the exciting opportunity for Salford to address the affordability issue through appropriate innovation.</p> <p>The policy should be reworded along the lines of "where developers can demonstrate a more appropriate response than this very traditional and unexciting approach" the response will be supported. Developers need to be incentivised to provide good quality. Policy HOU5 does nothing to provide for more, better quality and appropriate affordable housing. Instead it maintains a low quality status quo, whilst Salford's future deserves better.</p>	<p>housing. The city council does however consider it is important that any organisation should be approved by the council. Approved organisations may include developers, who could deliver the affordable housing in their schemes themselves.</p> <p>It is also recognised that there are a number of forms of affordable housing (social rented, shared ownership/equity, and discounted market housing). The council consider that where developers can propose an innovative way of providing affordable housing then this would also be supported.</p>	<p>should construct the units and sell them to a suitable organisation approved by the city council (normally a Registered Social Landlord) ...".</p> <p>Insert the following text into the Policy Reasoned Justification: "The city council would encourage developers to bring forward affordable housing in partnership with the city council's lead Registered Social Landlords (RSLs), details of which are listed in Appendix B. However, schemes may also be developed in conjunction with other RSLs / organisations, although these must be approved by the city council". (Policy HOU4).</p> <p>Amend the document to state that "Where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard that meets local needs and circumstances, the city council will consider other forms of provision to those listed above" [social rented housing, shared ownership/equity and discounted market housing].</p>
HOU5	Contour Housing (447)	Observations	May need to change the affordable housing threshold of 25 dwellings /	Disagree. The thresholds for providing affordable housing on	None.

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			1ha, as more schemes with less than 25 units will come forward due to the increases in size and the requirement for houses over apartments.	sites over 1ha / 25 dwellings are set by Policy H4 of the UDP, which the SPD must be in full accordance with. Any change to the thresholds would need to be made in a Development Plan Document.	
HOU5	Sport England (452)	Object	Thresholds for affordable housing should be reduced to the levels set out in draft PPS3.	See above response to Contour Housing above (representation 447).	None.
HOU5	North West Regional Assembly (460)	Object	It may be useful to include a definition of what is considered to be affordable housing in the reasoned justification. PPS3 includes a definition.	It is agreed that it would useful in terms of the type of units to define what is understood by affordable housing.	<p>Amend the document to state that "For the purposes of Policy HOU3, the definition of affordable housing includes:</p> <ul style="list-style-type: none"> <li>• Social-rented housing;</li> <li>• Shared ownership;</li> <li>• Shared equity; and / or</li> <li>• Discounted market housing</li> </ul> <p>Where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard that meets local needs and circumstances, the city council will consider other forms of provision to those listed above" (Policy HOU4).</p> <p>Make cross reference in the revised document to state that the guidance builds on the definition of affordable housing contained in the justification to UDP Policy H4 (paragraph 7.13). This states that "affordable housing is housing which meets the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing....</p>

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					The government define decent as one which is "wind an weather tight, warm and has modern facilities", and appropriate housing as housing "which meets the needs of a particular individual/households in terms of size, type and tenure".
HOU5	Cllr Geoff Ainsworth (466)	Observations	What safeguards are in place to ensure that a developer will not simply recoup 'loss of profit' by increasing density of redevelopment?	The density of development will need to be consistent with the other policies of the document on mix and size, UDP Policy DES1 and criteria A-H of UDP Policy H1, amongst others. The need to generate additional profit to cross-subsidise the provision of affordable housing will not be an acceptable justification for inappropriate densities.	None.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Para 6.1	Countryside Properties (Northern) Ltd (257)	Object	The use of percentage increases as justification is lazy and flawed. For example an 87% increase in average house prices means nothing unless it is placed in context. Prices could have started from a very low base and even with such an increase be affordable relative to incomes.	Agree in part that the rise in average house prices needs to be linked to the relative increase in income. However, although this link is not made in paragraph 6.1, paragraph 2.18 of the draft SPD did look at the widening ratio between average house prices and average household income.	Paragraph 6.1 has been deleted from the revised document.  However, paragraph 2.19 of the revised text looks at the increase in average house sale price, and then places this in context by setting out an increase between average house price and average household income.
Para 6.1	McCarthy and Stone (304)  Peel Investments (North) Limited (407)	Object	Rising house prices usually indicate the need for more intermediate housing products and not necessarily the creation of the need for more social rented housing. This situation does not, therefore, support the intentions of Policy	With regards to the preference for social rented accommodation please see response to representation numbers 312 and 414 relating to policy HOU7.  Paragraph 6.1 states that there was	None.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>HOU7 discussed later in this submission.</p> <p>The Land Registry figures between Jan-Mar 2005 and Jan-Mar 2006 actually show a 20.94% reduction in the average prices for Flats/Maisonettes, which, when factored into the overall change in prices, results in a 1.37% reduction in the overall average price of dwellings from £124,977 in 2005 to £123,248 in 2006. Thus the figures contained in paragraph 6.1 may not accurately reflect the current picture.</p>	<p>an 87% increase in the average house sale price between 2000 and 2004. This was calculated using property price data provided by Land Registry. Average property prices have been calculated using GIS software, by accumulating all property level sales and calculating the average. It is considered that average sale prices across a year are more accurate than looking at quarterly figures as the objector has, which are always likely to show greater fluctuations.</p>	
Para 6.2	<p>McCarthy and Stone (305)</p> <p>Peel Investments (North) Limited (408)</p>	Object	<p>Solely relying on the Housing Waiting List data to support this new affordable housing policy is inappropriate and premature without the results of the full Housing Market Assessment. The analysis that has been undertaken cannot be considered to fully comply with Government Guidance on Housing Needs Assessments.</p>	<p>In assessing affordable housing need the city council has used the methodology contained in the ODPM December 2005 "Housing Market Assessments: Draft practice guidance", which the Government considers to be an appropriate tool for identifying affordable housing need.</p>	None.
Para 6.4	<p>McCarthy and Stone (306)</p> <p>Peel Investments (North) Limited (409)</p>		<p>Neither the Affordable Housing Strategy nor this SPD offer sufficient detail to justify how the alleged need for 600 units per annum will be met through either the 20% requirement from all new housing sites or other sources of supply. An assessment of the following sources of supply will be needed to inform any resultant target:</p>	<p>See response to representations 300 and 403 (made to policy HOU5).</p> <p>Accept that the 2005 HIP return shows that there are 10,943 difficult to let dwellings owned by the city council, and a further 2,483 owned by RSLs. However the vacancy rate within LA stock in 2005 was 4.8% (1,286) and 6.6% (396 dwellings) in the RSL stock. Therefore the</p>	<p>See proposed changes in response to representations 300 and 403 (made to policy HOU5)</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<ul style="list-style-type: none"> <li>• Contribution from 100% Affordable Housing sites on Council/Publicly owned land;</li> <li>• Housing Strategy Initiatives such as Empty Homes Initiative, Rent Deposit Schemes; Cash Incentive Schemes, Tenants Incentive Scheme for transfers;</li> <li>• Better use of the existing stock base, refurbishment of vacant, unfit, difficult to let and low demand stock. (This last point is particularly important in Salford as the Housing Strategy Statistical Appendix 2005 for Salford identifies there are nearly 11,000 difficult to let and low demand dwellings owner by the City Council, and a further 2,483 owned by RSLs. This is likely to generate a much greater contribution to the supply of affordable housing than anything that the planning system can generate);</li> <li>• Potential contributions from UDP Allocated Sites;</li> <li>• Potential Contributions from windfall sites.</li> </ul> <p>Only when all of the above have been assessed in comparison to the full range of needs being identified, including those of the private housing market can a realistic attempt be made as determining an appropriate affordable housing</p>	<p>number of difficult to let dwellings does not equate to actual numbers of dwellings available for people to live in. It is considered that 3% is an acceptable level of vacancy in a normally functioning housing market, therefore it is only the vacant stock above 3% that could potentially help meet the need for affordable housing.</p> <p>The 2006 HIP return shows that vacancy rates have fallen substantially to 3.6% and 4.9% in the LA and RSL stock respectively. Additionally the level of difficult to let dwellings has reduced significantly in the LA stock. This suggests that problems of affordability are worsening, and that better use of existing stock is reducing the additional contribution that this source could make in the future.</p> <p>Notwithstanding this, the vacant stock above 3% has been included in the affordable housing needs assessment as surplus stock, and therefore has already been built into the calculation which results in the need for over 600 social rented dwellings per annum.</p>	

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			target for the Development Plan. In addition, all of the above needs to be assessed in terms of achieving best value for money, speed of delivery, and the level of financial resources available to enable the various options to be brought forward. None of this evidence is available in the context of this Housing SPD, and will need to be made available for the appropriate consideration of any future Housing DPD.		
Para 6.5	McCarthy and Stone (307)	Object	There is no current evidence to support the assumption of low household incomes or the need for a blanket 20% to be applied consistently throughout Salford. This will be especially true where high concentrations of affordable housing already exist	<p>Disagree that there is no current evidence to support a blanket 20% to be applied consistently throughout Salford.. Paragraph 6.5 of the draft SPD is quite clear with regards to why there is a 20% requirement across Salford. This is based on house price and income data.</p> <p>In all wards of the city the average house price exceeds average household income by a ratio of over 3. It was determined by an Affordable Housing Working Group (established by the Housing and Planning Directorate at the city council) and an All Party Member Steering Group that wards which have a ratio of above 3 have an affordability problem. Although it is recognised that mortgage providers do often lend at ratios exceeding this, the city council does not want to encourage unsustainable</p>	Amend the document to clarify that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate (Policy HOU3). Examples of such instances include "There is a very high level of affordable housing in the immediate area".

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>lending.</p> <p>It is accepted that in some circumstances the presence of a very high level of affordable housing in the immediate area may justify a lower proportion than 20%, but this will have to be balanced against the need for affordable housing.</p>	
Para 6.6	<p>McCarthy and Stone (308)</p> <p>Peel Investments (North) Limited (410)</p>	Object	As there is an unusually high proportion of social rented accommodation in Salford, with correspondingly low levels of owner occupation, Policies HOU5 and HOU7 do not seem to support the aim of promoting mixed and balanced communities.	<p>It is noted that Salford has a significant proportion of social rented accommodation when compared to the national average. However, this does not automatically mean that there is not a need for further social rented units, especially as the Affordable Housing Needs model shows a shortage of 600 such units.</p> <p>It is however accepted that rising average house price to household income ratios may indicate a need for intermediate housing alongside social rented units. The most appropriate type of affordable housing should therefore be determined having regard to need and other factors.</p>	<p>The document has been revised to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Additionally, where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being an automatic preference for social rented units as in the consultation draft SPD, the revised document states that the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (Policy HOU4).</p>
Para 6.7	<p>Persimmon Homes (North West) (120)</p> <p>Wilberton Properties (128)</p>	Object	This paragraph gives no comfort whatsoever to developers and the requirements of Policy HOU5 together with other policies in the SPD (in relation to dwelling mix) can only slow down the residential led regeneration and private sector	Noted. The document should be amended to respond more effectively to site specific circumstances.	Amend the document to clarify that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate (Policy HOU3). The reasoned justification to the policy

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			investments in Salford.		should also be amended to explain that developers will need to demonstrate to the satisfaction of the city council that such circumstances exist.
Para 6.7	Dandara Ltd. (183)	Object	<p>The first part of the paragraph acknowledges that in some instances the standard proportion of affordable housing may impact the financial viability of the development and a lower proportion may therefore be acceptable. However, the penultimate sentence appears to contradict this stating that the financial impact to the developer will always equate to forgoing profit on 20% of dwellings.</p> <p>Unless there is an opportunity to adjust the cost of the affordable housing element if it impacts on the financial viability of the development, then there is a risk that the policy as drafted could stifle development within the city.</p>	Agree that there may be a need for the 20% requirement to be reduced where the requirement for affordable housing would have an impact on financial viability, when combined with other planning obligations .	<p>Amend the document to clarify that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate (Policy HOU3). Examples of such instances include "the financial impact of the provision of affordable housing combined with other planning obligations as set out in the Planning Obligations SPD would affect scheme viability".</p> <p>Amend reasoned justification to explain that developers will need to demonstrate to the satisfaction of the city council that such circumstances exist (paragraph 5.8). Also state that the main situation where a reduced proportion of affordable housing or a lower commuted sum may be acceptable is likely to be where a development would become unviable. In such circumstances, the evidence provided by the developer should include a statement that has been professionally certified.</p>
Para 6.7	ASK Developments (241)	Object	It is welcomed that "The City Council is keen to provide certainty and fairness for developers through this SPD". However although the requirement in terms of numbers of dwellings may be reduced	See above response to Dandara Ltd (representation 183).	See above proposed changes in response to Dandara Ltd (representation 183).

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			Paragraph 6.7 is internally inconsistent and provides no comfort to developers trying to bring forward a finely balanced, complex regeneration project. It states that whatever the position, they will have to forego the profit on 20% of the dwellings on the site.		
Para 6.7	McCarthy and Stone (309)  Peel Investments (North) Limited (411)	Object	Accepted that Policy HOU5 has the potential to help provide certainty for developers in their financial planning. However, the evidence base to support the fundamental shift from requiring no affordable housing to the 20% requirement for predominantly social rented housing is not robust and the policy is therefore premature.	Note recognition that policy HOU5 will help provide certainty for developers in financial planning. However policy HOU5 of the draft SPD has been deleted, and the city council has removed the formulas from the policy as a result of other representations.  Disagree that the evidence base is not robust. The council has calculated affordable housing need using a ODPM model to assess the need for affordable housing. The steps set out in the Draft Practice Guidance have been followed in full by the city council. The 20% requirement derives from the need to maximise the provision of affordable housing through the planning system whilst ensuring that high quality development and the city's regeneration are not discouraged in any way.	None (although delete paragraph 6.7 in response to other representations).
Para 6.7	Sport England (453)	Object	The draft SPD states it will provide developers with certainty in financial planning with standard formulas. The implication however is that it will introduce a very complex system of control which may	Note recognition that policy HOU5 will help provide certainty for developers in financial planning. However policy HOU5 of the draft SPD has been deleted and the city council has removed the formulas	None (although delete paragraph 6.7 in response to other representations).

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>provide less certainty due to:</p> <ul style="list-style-type: none"> <li>• exceptions</li> <li>• variation in house type mix, affecting calculations regarding developer contribution to support off site infrastructure costs, given varied public needs generated by a greater variety of household types and sizes.</li> </ul>	<p>from the policy as a result of other representations. The need to take into account site specific circumstances means that absolute certainty cannot be provided.</p>	
Para 6.8	<p>McCarthy and Stone (310)</p> <p>Peel Investments (North) Limited (412)</p>	Object	<p>The advice to developers on the price that RSLs are likely to be able/prepared to pay for any affordable dwellings needs to be available now and as part of any evidence base to assess the full impact of Policy HOU5</p>	<p>Disagree. The price RSLs are able to pay for units will differ from scheme to scheme, as it is dependant on the type of affordable units, the location etc. The discount will be a matter for negotiation between developers, RSLs (or another approved body) and the city council. It will have to be sufficient to secure the involvement of the RSL or approved organisation.</p>	<p>None (although delete paragraph 6.8 in response to other representations).</p> <p>Amend the document to delete the 'at-cost' approach so that in the "case of social-rented and shared ownership housing, the developer should construct the units and sell them to a suitable organisation approved by the city council (normally a Registered Social Landlord) at an agreed discounted rate sufficient to secure their involvement" (revised policy HOU4).</p>

**Policy HOU6 – Off-site provision of Affordable Housing**

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council’s Interpretation of Representation	Council’s Response	Proposed Changes
HOU6	United Utilities Property Solutions (47)	Object	25% is arbitrary and should only be required in order to meet an identified need.	<p>The policy does not result in a 25% requirement. In circumstances where off-site provision is acceptable the amount of affordable housing required would be the same as that which would have been required had the affordable housing been provided on-site.</p> <p>In order to arrive at the same level of contribution the number of units within the primary site is divided by 4 to give the total number of affordable units that must be produced. The following example illustrates how the calculation works:</p> <ul style="list-style-type: none"> <li>• Number of dwellings on parent site = 60</li> <li>• Number of off-site dwellings (60/4) = 15</li> <li>• Compared with on-site provision (60x20%) = 12 units</li> <li>• Size of combined development (60+15) = 75 units</li> <li>• Proportionate Affordable remains at 20% (75 x 20% = 15)</li> </ul>	None – the formula for calculating off-site provision remains the same (revised Policy HOU3).

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				The developer must therefore provide 15 units on a second site at an affordable cost. This formula ensures that there is no difference in the proportionate level of contribution towards affordable provision between the on-site and off-site options.	
HOU6	Bellway Homes (99)	Object	Off-site provision is not objected to, although the formula would be too onerous.	Agree in part that in particular circumstances the formula may be too onerous. Although it would still result in a 20% affordable housing requirement (see response to representation 199), the council recognise that a lower proportion of affordable housing may be permitted where material considerations indicate this would be appropriate.	Amend the document to clarify that a lower proportion of affordable housing, or a lower commuted sum may be permitted where material considerations indicate that this would be appropriate (Policy HOU3). The reasoned justification to the policy should also be amended to explain that developers will need to demonstrate to the satisfaction of the city council that such circumstances exist.
HOU6	Vermont Developments (137)  George Wimpey Manchester Ltd (160)  Vanguard Textiles (351)	Object	The policy is too vague about the procedures that the council will implement in order to spend the affordable housing commuted sums. There should be an indication of time scales at the very least.	Agree that the city council needs to be clearer about the procedures the city council will implement in terms of spending commuted sums.	Insert additional text (into justification to revised policy HOU3) to state that: <ul style="list-style-type: none"> <li>• Commuted sums may be spent in the local area wherever possible;</li> <li>• It may be necessary to combine commuted sums from different developments;</li> <li>• Equity share loans may be funded using commuted sums (and continuously recycled);</li> <li>• All sums will be ring-fenced for the provision of affordable housing in an interest earning account; and</li> <li>• If the sum has not been spent within 5 years it will be returned to the developer with interest.</li> </ul>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU6	Vermont Developments (138)  George Wimpey Manchester Ltd (161)  Vanguard Textiles (479)	Object	There should be no requirement for commuted sums, if it is accepted that on or off site provision is not suitable / appropriate / possible.	Disagree. The purpose of the UDP and the draft Housing SPD is to ensure that developments above a certain size contribute to the provision of affordable housing. The payment of a commuted sum is one way of achieving this, particularly where on-site provision is not possible and the developer does not have access to other land in the area where off-site provision could be made.	See response to United Utilities (representation 47) above.
HOU6	George Wimpey Manchester Ltd) (159)	Object	As drafted this policy lacks clarity in respect of the council's intentions for securing an off-site contribution. Affordable housing should only be secured (or a contribution towards affordable housing secured) on the evidence of housing need that is geographically or functionally linked to the proposed site.	The draft SPD demonstrates the need for affordable housing which developers should help to meet in accordance with UDP Policy H1. Permitting off-site provision provides more flexibility for developers. It is however agreed that the policy should clarify that on-site provision is the preferred option, and that off-site provision should be within the local area  Where there is no requirement for on-site provision, it follows that there will not be a requirement for either off-site provision or a commuted sum payment.	Amend the document (reasoned justification to revised policy HOU3) to state that the preference in the policy is for affordable housing to be provided on site, although it is recognised that this may not always be appropriate or practicable.  Also amend the document to provide further details on the use of commuted sums – "Committed sums will be spent in the local area wherever possible, although this will depend on the availability of suitable sites". Commuted sums from different developments may be combined, and that commuted sums may be spent on providing interest free loans to those otherwise unable to afford accommodation. All commuted sums will be ring-fenced and will have to be spent within 5 years.
HOU6	Emerson Group (199)	Observations	No objection to off-site provision, if affordable housing need can be demonstrated. But why does the formula appear to result in a 25%	See response to United Utilities (representation 47) above.	See response to United Utilities (representation 47) above.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			provision?		
HOU6	Home Builders Federation (272)	Support with conditions	This policy appears to be acceptable subject to the above comments in relation to policy HOU5.	Comments noted.	None.
HOU6	McCarthy and Stone (311)  Peel Investments (North) Limited (413)	Object	Recognition that in some circumstances off-site affordable housing will be appropriate is appreciated. However, there is no justification to seek a greater proportion of affordable housing where off site provision is agreed in accordance with the requirements of paragraph 22 of Circular 6/98. The formula within Policy HOU6 will result in the provision of 25% rather than 20% affordable housing.  If the evidence base is supplied to support the indicative 20% requirement in Policy HOU5 then the dividing factor would be 5 and not 4 as stated.	See response to United Utilities (representation 47) above.	See response to United Utilities (representation 47) above.
HOU6	Cllr Geoff Ainsworth (465)	Object	Need to ensure that the formulae for off-site / commuted sum contributions will deliver and fund housing of the right type.	Agree that it is important that off-site / commuted sums should deliver and fund the right type of housing.	Amend the document to be clear that the type, size and mix of all affordable housing (whether it be provided on/off site or is delivered through a commuted sum) should be agreed in negotiation with the city council. Regard will be had to factors such as house prices, the characteristics of those in need etc. in the negotiation process.

## Policy HOU7 – Tenure of Affordable Housing

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU7	United Utilities Property Solutions (48)	Object	The tenure of affordable units is too restrictive. The policy should make provision for shared equity and reduced open market value in the criteria.	The city council agrees that the requirement for all affordable housing to be in the form of social rented units (unless otherwise agreed with the city council) is too restrictive, and that the policy should make provision for other forms of affordable housing.	<p>The document has been amended to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Additionally, where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being an automatic preference for social rented units as in the draft SPD, the most appropriate type of units will be agreed in negotiation with the council having regard to: securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).</p>
HOU7	Bellway Homes (100)	Object	The policy wrongly assumes social rented housing to be the preferred option, and ignores other forms of intermediate housing that are equally relevant.	Although Policy HOU7 does state that all affordable homes should be in the form of social rented units, it is also clear that intermediate provision will be considered under certain circumstances. However, the council recognise that the form of affordable housing should be determined by need and so accept that there should not be the automatic preference for social rented units.	See above changes in response to United Utilities (representation 48)
HOU7	Vermont	Object	Planning policy should not be	Agree that in accordance with	See above changes in response to

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
	Developments (139)  George Wimpey Manchester Ltd (163)  Vanguard Textiles (352)		expressed in favour of any particular form of tenure (para 4 Circular 6/98).  The Affordable Housing Needs Assessment does not conclude that only social rented housing is required.	paragraph 4 of Circular 6/98, planning policy should not be expressed in favour of any particular form of tenure.  Agree in part. As stated in paragraph 6.13 of the draft SPD, given that the affordable housing requirement for 603 dwellings per annum over the next decade is calculated primarily from the housing register, it is effectively a measure of the need for social rented housing. However it is acknowledged that there is likely to be an element of the social rented housing shortfall that could be met by other forms of affordable housing such as intermediate provision.	United Utilities (representation 48)
HOU7	Vermont Developments (140)  George Wimpey Manchester Ltd (164)  Vanguard Textiles (480)	Object	There is no acknowledgment of the feasibility for the developer of providing only social rented dwellings. This could have serious repercussions for regeneration of brownfield sites	Agree that the requirement for the provision of only social rented units is too restrictive, and that other types of affordable housing could be more appropriate in particular circumstances.	The document has been amended so that the preference for social rented units has been deleted. The most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).  If it is considered that social rented units are most appropriate, the document is now clear that a lower proportion of affordable housing may be appropriate where "It would not otherwise be possible to provide the affordable dwellings with a sufficient discount to enable the units to be

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
					purchased by an RSL" (Policy HOU3).
HOU7	George Wimpey Manchester Ltd (162)	Object	<p>It is worth noting that Salford in general has a significant proportion of social rented accommodation against the national average (this is stated in para 2.13 of the SPD). The draft SPD refers to the need for more affordable homes due to the increasing rise in house prices when set against current levels of household income. This would suggest affordable housing through discounted for rent and shared equity provision may also be appropriate.</p>	<p>It is noted that Salford has a significant proportion of social rented accommodation when compared to the national average. However, this does not automatically mean that there is not a need for further social rented units, especially as the Affordable Housing Needs model shows a shortage of 603 such units per annum.</p> <p>It is however accepted that rising average house price to household income ratios may indicate a need for intermediate housing alongside social rented units. The most appropriate type of affordable housing should therefore be determined having regard to need and other factors.</p>	<p>The document has been revised to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Additionally where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being an automatic preference for social rented units as in the draft SPD, the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU7	George Wimpey Manchester Ltd (165)	Object	It is improper for the policy to suggest that the tenure proportion can be dictated by an RSL who is not party to the application. Tenure proportion should be considered on the strength of housing need and the availability of public subsidy.	Agree that the decision concerning the most appropriate type of affordable units should not be dictated by an RSL, and that tenure mix should be determined by need and availability of subsidy.	Amend the document to state that the most appropriate type and mix of units will be agreed by the council and developer (and not an RSL) having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (Policy HOU4).  Where no public subsidy is available, and it is therefore not viable for a developer to provide the preferred dwelling mix, then it may be that that a lower proportion of affordable housing may be appropriate (Policy HOU3).
HOU7	George Wimpey Manchester Ltd (166)	Object	There is no basis for the council to insist that the equity of shared accommodation is transferred to the council at nil cost to the council. This would be a flagrant abuse of planning powers for the council to insist on an ownership transfer as part of this draft SPD, and is tantamount to seizure of assets.	Agree that this should not be a requirement, because there may be other ways in which the shared equity housing could be managed without the involvement of the city council. However, it is still one possible approach to managing a shared equity scheme.	Delete this requirement from the document.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU7	George Wimpey Manchester Ltd (167)	Object	The equation suggested for calculating equity proportion would appear to be completely incorrect and requires redrafting.	<p>Agree that the draft SPD calculation for the proportion of the equity owned by the purchaser is incorrect. This was a drafting error in the production of the draft SPD and the formula should have read as follows:</p> <p>Proportion of equity owned by purchaser (%) =</p> <p>"At cost" price paid by the purchaser divided by open market value of the property at the time of purchase, multiplied by 100.</p> <p>However, the "at-cost" approach has now been deleted from the document, and therefore the formula is no longer needed.</p>	None. Delete the formula for calculating the proportion of equity owned by the purchaser from the document.

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU7	Dandara Ltd (184)	Object	We object to the council seeking that all affordable housing will be in the form of social rented accommodation as a default position. Developers should have the opportunity to opt for the provision of intermediate housing on a shared equity basis in the first instance.	Agree in part that there should not be an automatic preference in the policy for social rented accommodation. However the council do not consider that developers should have the opportunity to opt for intermediate housing in the first instance. The most appropriate mix should be a matter for negotiation between the city council and developer having regard to a number of factors.	<p>The document has been amended to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Additionally the document has been amended so that the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).</p>
HOU7	The Emerson Group (201)	Object	There seems to be considerable variation with regards to this policy and paragraph 2.13 (where it is stated that Salford has a high proportion of social rented stock). In order to improve the situation and reduce the percentage of social rented stock, intermediate housing is one appropriate solution to give the opportunity for progression to owner occupation.	<p>It is noted that Salford has a significant proportion of social rented accommodation when compared to the national average. However, this does not mean that there is not a need for further social rented units, especially as the Affordable Housing Needs model shows a shortage of around 600 such units per annum.</p> <p>It is however accepted that rising average house price to household income ratios may indicate a need for intermediate housing alongside social rented units. The most appropriate type of affordable housing should therefore be</p>	<p>The document has been amended to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Additionally Where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being an automatic preference for social rented units as in the draft SPD, amend the revised document to state that the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				determined having regard to need and other factors.	diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).
HOU7	The Emerson Group (481)	Object	A discount on open market values supported by resale covenant should be considered as an option as this gives an element in perpetuity, unlike most other forms of affordable housing which are hostage to right to buy, home buy etc.	The council considers that one form of affordable housing that may be appropriate, dependent on need and local circumstances, is shared equity housing whereby a resident will purchase a share in a house and the remaining equity is then held in the property. However the council consider that this should only be in limited circumstances, as it remove any potential for staircasing.	Insert the following paragraph into the revised document: "In limited circumstances the city council may consider that it is appropriate for part of the remaining equity [in equity share schemes] to effectively be permanently held within the property through a land charge / covenant. This does not enable the proportion of the property owned by the resident to be increased and so provides less flexibility and adaptability, but it does ensure that the property remains affordable in perpetuity and such schemes can be simpler for developers" (paragraph 5.22, Reasoned Justification to HOU4).
HOU7	Barratt (Manchester) Ltd (213)	Object	There is a further inconsistency with a policy which recognises that intermediate housing has an important role to play, yet will normally seek all affordable housing to be in the form of social rented accommodation. The Council will of course have a role to play in negotiating the nature of any specific scheme, but we are concerned about the starting point of requirements being set out in policies worded in such a way that there is a presumption that they will automatically apply.	Agree that the presumption for the most appropriate form of affordable housing being social rented tenure, is too restrictive.	Instead of there being an automatic preference for social rented units as in the draft SPD, amend the revised document to state that the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).
HOU7	Countryside	Object	We recognise the underlying clarity	Agree that in accordance with	The document has been amended to

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
	Properties (Northern) Ltd (258)		<p>and fairness that the policy seeks to offer, but would again point to Circular 6/98, which states at para 4 that, "Planning policy should not be expressed in favour of any particular form of tenure", and at para 9 (a), that low-cost market and subsidised housing both have role to play.</p> <p>A more rigorous needs based assessment would help to support the Council's position, but would also highlight the needs of those who aren't necessarily on the Council House Register such as first time buyers and key workers.</p>	<p>paragraph 4 of Circular 6/98, planning policy should not be expressed in favour of any particular form of tenure.</p> <p>The council recognises that low cost market housing (discounted market housing) may sometimes be appropriate, however this will only be in very limited circumstances as such housing is only normally affordable when it is initially sold.</p> <p>In assessing affordable housing need the city council has used the methodology contained in the ODPM December 2005 "Housing Market Assessments: Draft practice guidance", which the Government considers to be an appropriate tool for identifying affordable housing need.</p>	<p>state that acceptable forms of affordable housing include social rented housing; shared ownership;; shared equity and/or discounted market housing. Additionally where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being an automatic preference for social rented units as in the draft SPD, amend the document to state that the most appropriate type of units will be agreed in negotiation with the council having regard to: securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (Policy HOU4).</p> <p>The document has been amended to provide details and clarification on when discounted market housing may be appropriate (HOU4, paragraph 5.23).</p>
HOU7	Countryside Properties (Northern) Ltd (259)	Object	The illustrated formula (in relation to the calculation of the proportion of the equity owned by a purchaser) needs rewording to deliver its aim, as it simply repeats the off-site contribution calculation.	<p>Agree that the formula is incorrect as it is for the calculation of the commuted sum value (and not for calculating the proportion of equity owned by the purchaser as intended). This was a drafting error and should have read:</p> <p>"Proportion of equity owned by purchaser (%) = "At cost" price paid by the purchaser divided by open</p>	<p>Delete the formula for calculating proportion of equity owned by purchaser.</p> <p>Instead of there being a preference for social rented units as in the draft SPD, amend the document to state that the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities;</p>

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				market value of the property at the time of purchase, multiplied by 100".  However, the "at-cost" approach has now been deleted and the formula is therefore no longer needed.	existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).
HOU7	Home Builders Federation (273)	Object	The HBF has concerns regarding the need to clearly demonstrate the unmet demand for affordable housing in the local area is for intermediate housing rather than social housing.	Agree that the requirement for all units to be social rented (unless particular circumstances apply) as opposed to intermediate housing is inappropriate.	Instead of there being an automatic preference for social rented units as in the draft SPD, amend the document to state that the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).
HOU7	McCarthy and Stone (312)  Peel Investments (North) Limited (414)	Object	Given the lack of any robust evidence base to support Policy HOU5, the requirement in Policy HOU7 that generally all affordable housing will be social rented has no basis. It is also contrary to Circular 6/98 which specifically requires affordable housing policies to be tenure neutral	Agree that in accordance with paragraph 4 of Circular 6/98, planning policy should not be expressed in favour of any particular form of tenure.	Instead of there being an automatic preference for social rented units as in the draft SPD, amend the document to state that the most appropriate type of units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).
HOU7	Contour Housing (448)	Observations	It can be difficult for an RSL to make a scheme stack up financially without any form of grant, therefore there needs to be a clause that enables the RSL not to accept all rented but a mix of outright sale / shared ownership / rented (or any	The city council recognises that it is sometimes difficult for RSLs to make schemes work financially when there is a requirement for all social rented units. However it is not considered appropriate for an RSL to determine the most appropriate	Amend the document to state that the type, size and mix of affordable housing to be provided should be agreed through negotiation between the city council and developer having regard to a number of factors. In the case of social rented and shared

Paragraph/ Policy	Respondent / Rep No.	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			combination of these)	mix of dwellings. This will be a matter for negotiation between the city council and developer, although may be informed by evidence provided by RSLs.	<p>ownership housing, the developer should construct the units and sell them to a suitable organisation approved by the city council (normally an RSL) at an agreed discount rate sufficient to secure their involvement (revised policy HOU4).</p> <p>A lower proportion of affordable units may be permitted where material considerations indicate that this would be appropriate. Such circumstances could include, for example, where "It would not be possible to provide the affordable dwellings with a sufficient discount to enable the units to be purchased by an RSL". Such a situation may arise when it is determined that there is a need for all social rented units (revised policy HOU3).</p> <p>Amend the justification to policy HOU4 to state that in terms of the type of affordable housing "A mix of provision will be encouraged on larger sites in accordance with policies elsewhere within this SPD".</p>

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Para 6.13	McCarthy and Stone (313)  Peel Investments (North) Limited (415)	Object	The reasoned justification provided in paragraph 6.13 is flawed. Reliance on the Housing Waiting List alone cannot enable the full range of housing needs to be accurately assessed. This paragraph states that the housing	It is considered that rising average house price to household income ratios indicates a need for intermediate housing alongside social rented units.  Agree that a requirement for all	Amend the SPD to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Additionally Where a developer proposes an innovative

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>waiting list "is effectively a measure of those needing social rented housing." The city council has an incredibly high level of vacant and low demand social rented housing, in more than sufficient quantities to meet social rented housing need. This does not support the requirement for all new residential developments to now contain 20% more social rented housing.</p> <p>If there is indeed a need for the planning system to make any contribution to affordable housing, it may be better to meet needs by providing commuted sums to generate much needed investment in the existing social stock base.</p> <p>Housing Market Assessment results may identify that intermediate housing may best meet the aims and objectives of sustainable communities by adding to the limited intermediate stock in the city (rather than adding to social rented stock which is already higher than average compared to other areas).</p>	<p>affordable units to be in the form of social rented housing may not be appropriate.</p> <p>Disagree that the council has an incredibly high level of vacant and low demand social rented housing to meet social rented housing need. The 2006 HIP return shows that there are 7,502 difficult to let dwellings owned by the city council, and a further 3,192 owned by RSLs. However the vacancy rate within LA stock as of 1st April 2006 was 3.6% (956) and 4.9% (287 dwellings) in the RSL stock. Therefore the number of difficult to let dwellings does not equate to actual numbers of dwellings available for people to live in. It is considered that 3% is an acceptable level of vacancy in a normally functioning housing market, therefore it is only the vacant stock above 3% that could potentially help meet the need for affordable housing.</p> <p>The vacant stock above 3% has been included in the affordable housing needs assessment as surplus stock, and therefore has already been built into the calculation which result in the need for over 600 social rented dwellings per annum.</p> <p>The council agrees that commuted</p>	<p>way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being an automatic preference for social rented units as in the draft SPD, amend the document to state that the most appropriate type of affordable units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (revised Policy HOU4).</p> <p>The document has been amended to make it clear that commuted sums will be ring-fenced for the provision of affordable housing, of which improving existing social stock may be appropriate. (paragraph 5.13, reasoned justification to revised Policy HOU3).</p>

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				sums could be spent on improvements to the existing social stock.	
Para 6.14	Cllr Geoff Ainsworth (467)	Observations	<p>Is it appropriate that paragraph 6.14 should specify that affordable housing should normally be in the form of social rented housing? Is there not an identified (if unquantified) need (as for instance demonstrated by right to buy sales) for low cost/value sale (intermediate) housing that could be provided by means such as resale covenant or 'golden share' to attempt to ensure future resales at a specified discount to open market values.</p> <p>Salford already has a high proportion of stock that is social rented and there is an increasing abundance of privately market rented accommodation.</p>	<p>It is noted that Salford has a significant proportion of social rented accommodation when compared to the national average. However, this does not automatically mean that there is not a need for further social rented units.</p> <p>It is however accepted that rising average house price to household income ratios may indicate a need for intermediate housing alongside social rented units. The most appropriate type of affordable housing should therefore be determined having regard to need and other factors.</p>	<p>Amend the document to state that acceptable forms of affordable housing include social rented housing; shared ownership; shared equity and/or discounted market housing. Additionally where a developer proposes an innovative way of providing truly affordable housing of a decent and appropriate standard then this will be considered.</p> <p>Instead of there being an automatic preference for social rented units as in the draft SPD, amend the document to state that the most appropriate type of affordable units will be agreed in negotiation with the council having regard to; securing mixed and diverse communities; existing housing in the local area; characteristics of households in need; and local house prices (Policy HOU4).</p>
Para 6.15	McCarthy and Stone (314)  Peel Investments (416)	Object	<p>Paragraph 6.15 amplifies that in the event of an RSL being unable to take up the affordable housing, the developer will be required to build and sell the units at the 'at cost' price and then provide a cash sum to the Council equivalent to the difference between the open market value and the 'at cost' price. This is inappropriate because it would theoretically enable those not in need to buy discounted houses,</p>	<p>The formula in policy HOU7 is incorrect as it is for the calculation of the commuted sum value (and not for calculating the proportion of equity owned by the purchaser as intended). This was a drafting error and should have read:</p> <p>"Proportion of equity owned by purchaser (%) = "At cost" price paid by the purchaser divided by open market value of the property at the</p>	<p>Amend the document to state that shared equity dwellings may be an appropriate form of affordable housing, and that the preferred type should be agreed in negotiation with the city council having regard to a number of factors (revised policy HOU4). Delete the formula for calculating proportion of equity owned by the purchaser due to the deletion of the "at-cost" approach.</p>

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>and then sell them on at open market value making an overnight profit.</p> <p>The unsold equity needs to be defined in terms of a discount on the open market price. The ability to manage this when these properties are sold on, or the occupiers "staircase", could be transferred to the Council in the form of some kind of restrictive covenant. This would enable the Council to nominate future purchasers to this form of affordable housing. If staircasing is not restricted, then the Council could use the staircasing receipts to reinvest in other affordable housing.</p>	<p>time of purchase, multiplied by 100".</p> <p>However, the "at-cost" approach has now been deleted, and is therefore no longer required.</p> <p>The policy in the draft SPD was clear that where no RSL could take up the affordable housing, then the affordable housing should be sold by the developer on a shared equity basis with the purchaser paying the "at-cost" price, and the remainder of the equity being transferred at no cost to the city. The developer would not therefore be providing a cash sum to the council equivalent to the difference between the open market value and the "at cost" price.</p> <p>Agree that as worded the policy and approach may be open to abuse, as it is not clear what controls are to be placed on the occupancy and subsequent sale of discounted units.</p> <p>Agree that in particular circumstances restrictive covenants may be appropriate. Where staircasing does occur then it is agreed that the council should recycle receipts.</p>	<p>In the reasoned justification to revised policy HOU4 (paragraphs 5.21-5.22) state that "As an alternative to shared equity dwellings being provided through RSLs, the equity share may be transferred to the city council by the developer. The city council will recycle any receipts received through 'staircasing' into other affordable housing developments, or through the provision of equity loans to those in need". Further state that "In limited circumstances the city council may consider that it is appropriate for part of the remaining equity to effectively be permanently held within the property through a land charge / covenant. This does not enable the proportion of the property owned by the resident to be increased and so provides less flexibility and adaptability, but it does ensure that the property remains affordable in perpetuity and such schemes can be simpler for developers".</p> <p>Add the following text to revised document paragraph 5.23 to state that "When discounted market houses are initially sold, a covenant will be placed on the property to ensure that if the initial occupier sells the property on the open market within an identified period, then they will have to pay back some or all of the subsidy".</p> <p>Amend the text to also state that in</p>

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
					very limited circumstances discounted market housing may be appropriate, as such housing is only normally affordable when it is initially sold.

## Policy HOU8 – Type of Affordable Housing

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU8	United Utilities Property Solutions (49)	Object	This policy is unrealistic and is not based on any empirical evidence of a housing needs assessment. The type of affordable units should be determined by a housing market assessment in order that the housing provided serves the meet demand and support the local economic growth objectives for the area.	Agree in part that the type (mix) of affordable units should be determined by need and demand. However it is also important to recognise that other factors will also have an influence in determining the most appropriate mix.	<p>Amend the document to state that “The type, size and mix of affordable housing to be provided should be agreed in negotiation with the city council, having regard to the following factors:</p> <ul style="list-style-type: none"> <li>• The Government objectives of securing mixed communities and greater diversity in the housing stock;</li> <li>• The existing supply of affordable housing within the local area;</li> <li>• The characteristics of the households in need of affordable housing; and</li> <li>• Local house prices” (Revised policy HOU4).</li> </ul> <p>Add to the reasoned justification that the type of affordable housing will be negotiated on a site-by-site basis, taking account of local needs and circumstances. The context of such discussions will be need to secure mixed and sustainable communities, with a broad range of different dwelling types.</p>
HOU8	Bellway Homes (102)	Object	The level of prescription in the policy is far too prescriptive.	Disagree that the policy is too prescriptive. However the city council considers that type and mix of dwellings should be determined on a site by site basis, having regard to need and relevant other factors (as opposed to the	See proposed changes in response to United Utilities (representation number 49) above.

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				affordable units reflecting the mix of market units).	
HOU8	George Wimpey Manchester Ltd (169)	Object	The size and type of dwellings provided should only be properly decided on the evidence of housing need, as assessed by a rigorous housing needs assessment.	See council's response to United Utilities (representation number 49) above	See proposed changes in response to United Utilities (representation number 49) above.
HOU8	George Wimpey Manchester Ltd (170)	Object	It is not acceptable for third parties (such as RSL's) to have the right to request alternative dwelling mixes other than by agreement with the developer, given that they are not party to the application.	Agree in part RSLs should be able to inform discussions, as they may have relevant evidence, but the matter is ultimately a negotiation between the council and the developer.	Delete reference to RSLs being able to determine the most appropriate mix of dwellings on sites. The most appropriate mix will be determined through negotiation between the developer and the city council.
HOU8	Barratt (Manchester) Ltd (214)	Object	It is simplistic to equate reduced floorspace in certain dwellings with the provision of equivalent floorspace in additional dwellings, as it is more expensive to construct a larger number of small units than it is to construct a smaller number of larger units.	Agree that it is too simplistic to equate reduced floorspace in certain dwellings with the provision of equivalent floorspace in additional dwellings.	Delete references to the link between floorspace and the number of affordable units to be provided.
HOU8	Countryside Properties (Northern) Ltd (260)	Object	The flexibility that the policy seeks to introduce and the fact that the size and type of the affordable units should be the same as the rest of the development is fully supported. However it would be unreasonable, where there is no Housing Corporation Funding, for the Council or RSL to make changes. Any changes can instantly differentiate units, where the aim is for them to be tenure blind.	The council recognise support for the flexibility that the policy in the draft SPD offered. The document should be amended to recognise that the most appropriate mix should be determined on a site by site basis through negotiations between the city council and the developer. However, it may be appropriate for RSLs to provide evidence to inform these negotiations.	Delete reference to RSLs being able to determine the most appropriate mix of dwellings on sites. The most appropriate mix will be determined on a site-by-site basis through negotiation between the developer and the city council (revised policy HOU4).  Amend the document to state that affordable housing should be integrated into the rest of the development, and visible differences between different tenures of provision should be minimised as far as practicable. Expand on this in the reasoned justification (revised policy

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HOU8	McCarthy and Stone (315)  Peel Investments (417)	Object	<p>The policy is unsupported by any robust evidence base.</p> <p>To suggest at the whim of an RSL that the mix of units may be varied is not a valid basis for Policy. If there are genuine reasons why a certain mix is required for either market or affordable housing that needs to be based on a clear evidence base (i.e. a Housing Market Assessment).</p>	Agree that it is too simplistic to equate reduced floorspace in certain dwellings with the provision of equivalent floorspace in additional dwellings.	<p>HOU5).</p> <p>Delete references to the link between floorspace and the number of affordable units to be provided.</p>

## Policy HOU9 – Design of Affordable Housing

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU9	Bellway Homes (103)	Support with conditions	Need to make clear whether the policy relates to the exterior and not the interior of affordable homes.	Agree that it is unclear whether the policy relates to the interior or exterior (or both) of dwellings and that there is a need for clarification.	The document has been amended to make it clear that the interior and exterior of dwellings should be designed so that the open market housing and affordable housing cannot be distinguished as much as possible (revised paragraph 5.28).
HOU9	George Wimpey Manchester Ltd (168)	Object	PPS1 confirms that a council has no powers, beyond Building Regulations, to impose standards of construction on schemes. Therefore reference to Scheme Development Standards should be deleted.	The council agrees that it is inappropriate to specifically require compliance with Scheme Development Standards, as they will only be relevant to Housing Corporation funded schemes.	Delete reference to new dwellings having to conform to Housing Corporation Scheme Development Standards. Affordable units should be designed so that they are integrated into the rest of the development, and visible difference between tenures should be minimised, as far as practicable (revised policy HOU5).
HOU9	The Emerson Group (203)	Observations	On the face of it no objection but open market housing does not need to conform with Housing Corporation Scheme Development Standards.	Agree that open market housing should not need to conform to the Scheme development Standards. However, it is also considered that the requirement should not apply to all affordable dwellings as it is only applicable where Housing Corporation funding is used.	Delete reference to new dwellings having to conform to Housing Corporation Scheme Development Standards. Affordable units should be designed so that they are integrated into the rest of the development, and visible difference between tenures should be minimised, as far as practicable (revised policy HOU5).
HOU9	Countryside Properties (Northern) Ltd (261)	Object	The principle that affordable and market units are the same is supported. However, by introducing a requirement for Scheme Development Standards and allowing RSLs to re-design units the Council introduces elements that mean units won't be constructed to the same standards. SDS should only be required where the RSL's	Accept that the requirement for affordable units to be built to SDS should only apply where Housing Corporation Funding is used, as it would potentially lead to external differences between the affordable and market housing, due to units built to SDS usually having a larger footprint.	Delete reference to new dwellings having to conform to Housing Corporation Scheme Development Standards. Affordable units should be designed so that they are integrated into the rest of the development, and visible difference between tenures should be minimised, as far as practicable (revised policy HOU5).

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			<p>will be using Housing Corporation Funding.</p> <p>SDS would require units to be Eco Homes 'very good' at the present time, however, the market units may only achieve 'good'. If units are to be integrated as required by HOU9 the present Eco Homes assessment mechanism does not assess an individual unit, therefore the overall score for very good may not be achieved. It is not simply a case of bringing market units up to the required level as such a requirement would introduce additional costs into units which would then need to be reflected in an increase to the Open Market Value. There is also the Housing Quality Indicator (HQI) assessment within the SDS standards that needs to be considered.</p> <p>If the Council's interpretation of the SDS standards is in relation to the internal spatial standards then it should make this clear. The problem then is that SDS normally means bigger units than the market would normally deliver and could therefore be socially divisive as those purchasing a property see social tenants getting larger accommodation. To simply increase the size of market units to match SDS would tend to increase open market values.</p>	<p>Also agree that such a requirement could be potentially socially divisive, and that it would not be appropriate to require the market units to be built to SDS as this would increase the costs of open market units, and potentially have an impact on dwelling affordability. This was not the intention of the policy.</p>	

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			The requirement for units to be SDS compliant should be removed unless they are to be funded by the Housing Corporation.		
HOU9	Home Builders Federation (274)	Object	Policy requirements in relation to the design of affordable housing are overly prescriptive, and the SPD should instead ensure that the advice complies with national design guidance. This will ensure that the document can be kept up to date with evolving national guidance as and when it is produced.	Agree in part that policy requirements in relation to the design of the affordable units are too prescriptive, and that the design of units should be in conformity with national design guidance. However, it is also considered that local policies (such as the UDP) will be an important consideration in determining the most appropriate design for a scheme.	Delete reference to new dwellings having to conform to Housing Corporation Scheme Development Standards. Affordable units should be designed so that they are integrated into the rest of the development, and visible difference between tenures should be minimised, as far as practicable (revised policy HOU5).
HOU9	McCarthy and Stone (316)  Peel Investments (North) Limited (418)	Object	Unless affordable housing is supported by social housing grant, there is no basis upon which to require a developer or an RSL for that matter to comply with Housing Corporation Scheme Development Standards as this is simply a condition of Social Housing Grant. This can be an aspiration where appropriate, but cannot be considered a requirement.	Agree that the requirement for all affordable dwellings to conform with Housing Corporation Scheme Development Standards is inappropriate, and that the requirement is only applicable where Housing Corporation funding is used.	Delete reference to new dwellings having to conform to Housing Corporation Scheme Development Standards. Affordable units should be designed so that they are integrated into the rest of the development, and visible difference between tenures should be minimised, as far as practicable (revised policy HOU5).
HOU9	McCarthy and Stone (317)  Peel Investments (North) Limited (419)	Object	Compliance with Scheme Development Standards in some cases may actually be counter productive, as it will lead to a clear distinction between the market and the affordable housing. For example Social Housing Grant cannot be used to support the provision of garages for affordable housing. Market housing usually has	Note support for market housing being indistinguishable from affordable housing, and recognise that requiring SDS is an inappropriate way of doing this.	Delete reference to new dwellings having to conform to Housing Corporation Scheme Development Standards. Affordable units should be designed so that they are integrated into the rest of the development, and visible difference between tenures should be minimised, as far as practicable (revised policy HOU5).

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>garages. Conversely, space standards for social housing are often higher than those used by developers in the standard house type design, and will therefore lead to the provision of larger units which will also be distinguishable from market housing.</p> <p>In general terms there would be support for market housing being indistinguishable from social housing, but requiring affordable housing units to automatically comply with the Housing Corporation Scheme Development Standards is an inappropriate way to achieve this aim.</p>		
HOU9	GONW (361)	Object	It is considered that there are insufficient links between this policy and UDP policies.	The policy has been amended to ensure that it falls completely within the parameters of UDP Policies H1 and H4.	Amend the document to focus on integrating affordable housing into developments and minimising visible differences between different tenures.
HOU9	Contour Housing (449)	Object	Need to refer to Housing Corporation's EcoHome and HQI's standards, as their Scheme Development Standards document may not fully cover these.	Agree that reference should be made to EcoHomes and HQI's.	Amend the SPD to state that where Housing Corporation funding is being used homes have to meet the 'very good' EcoHomes standard. In addition new dwellings will have to achieve high HQI scores.
HOU9	Contour Housing (450)	Object	RSL's will want to ensure that they are able to agree the specification on social rented accommodation as they will need to ensure the long term maintenance elements / life cycles.	Agree that RSLs should have an input into the design of social rented units to ensure the long term maintenance elements / life cycles.	The document has been amended to state that "Where a Registered Social Landlord is to manage the affordable housing then they should be involved in the design process at the earliest opportunity, to ensure that the dwellings will meet the requirements of their future occupants" (revised Policy HOU5).

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HOU9	North West Regional Assembly (461)	Object	It may be useful to make explicit that the design of new affordable dwellings (policy HOU9) will need to conform to the expectation set out in policy HOU4 with regard to Lifetime Homes standards.	Disagree. The Lifetime Homes requirement has been deleted and therefore such links are no longer required.	None.

## Policy HOU10 – Securing the Affordable Housing

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU10	United Utilities Property Solutions (50)	Object	The policy is too restrictive and does not take account of the fact that the cost of delivery of development can sometimes be abnormally high. Often, open market housing is needed to cross-subsidise affordable housing and this policy prevents this and would stifle regeneration.	Noted. The policy has been deleted and the references to phasing included in the revised HOU3. No specific proportions are mentioned, and would be the subject of negotiation.	None.
HOU10	Bellway Homes (104)	Object	The use of s106 obligations is normal practice and there is therefore no objections to their use. It is not always possible, however, to agree Heads of Terms prior to submission. It is suggested that a draft Heads of Terms form would be of more use than an agreement at submission stage.	Agree that the delivery of affordable housing will normally be through a s106 agreement. However, the scope / principles (Heads of Terms) of the Section 106 agreement should be subject to negotiation and agreement prior to the application being considered by the Planning and Transportation Regulatory Panel.  It is anticipated that the Heads of Terms might include details of the number of dwellings to be provided, their specifications, the timing of delivery etc.	Amend the document to state that as a minimum, the scope / principles (Heads of Terms) of the Section 106 agreement should be subject to negotiation and agreement prior to the application being considered by the Planning and Transportation Regulatory Panel. Once the Committee has resolved to grant planning permission and agreed the terms of the obligation, it is intended that a standard legal agreement will be used (revised paragraphs 7.5-7.6).
HOU10	Bellway Homes (105)	Object	Phasing thresholds are too prescriptive and must be negotiated on a site by site basis, reflecting the circumstances of each individual case.	Agree that the phasing requirement in the draft SPD is too prescriptive, and that it would be more appropriate to consider such details on a site by site basis.	Amend the document by deleting the phasing requirements in draft Policy HOU10. The guidance now states that "The construction of the affordable housing, or payment of commuted sums, should normally be phased with the rest of the development" (policy HOU3). The phasing will normally be achieved through the use of a planning

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HOU10	Vermont Developments (141)  George Wimpey Manchester Ltd (171)  Vanguard Textiles Ltd (353)	Object	If contributions are to be taken from a developer and spent in another part of the City on an unrelated development, this policy would be contrary to advice in Circular 05/05 (as there would be no geographical or functional link).	Agree that for commuted sums to be acceptable, they must meet the Secretary of State's Policy Test. Paragraph B8 of Circular 05/05 states that "Obligations must also be so directly related to proposed developments that the development ought not to be permitted without them – for example, there should be a functional or geographical link between the development and the item being provided as part of the developer's contribution". It is considered that if affordable housing were to be provided in another part of the city using commuted sums there would be a functional link (i.e. meeting the need for affordable housing).  Notwithstanding this, the city council considers that further details are needed about the use of commuted sums.	condition (paragraph 5.14).  Insert additional text (into justification to revised policy HOU3) to state that: <ul style="list-style-type: none"> <li>• Commuted sums will be spent in the local area wherever possible, although this will depend on the availability of suitable sites;</li> <li>• It may be necessary to combine commuted sums from different developments;</li> <li>• Equity share loans may be funded using commuted sums;</li> <li>• All sums will be ring-fenced for the provision of affordable housing in an interest earning account; and</li> <li>• If the sum has not been spent within 5 years it will be returned to the developer with interest.</li> </ul>
HOU10	George Wimpey Manchester Ltd (172)	Object	Phasing of affordable housing should be negotiated on a site by site basis.	Agree that the phasing requirement in the draft SPD is too prescriptive, and that it would be more appropriate to consider such details on a site by site basis.	Amend the document by deleting the phasing requirements in draft Policy HOU10. The guidance now states that "The construction of the affordable housing, or payment of commuted sums, should be phased with the rest of the development" (policy HOU3). The phasing will normally be achieved through the use of a planning condition (paragraph 5.14).
HOU10	Dandara Ltd. (185)	Object	The completion of the affordable and open market housing should be	Noted. The phasing requirement in the draft SPD is considered too	Amend the document by deleting the phasing requirements in draft Policy

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			concurrent.	prescriptive and should be replaced.	HOU10. The guidance now states that "The construction of the affordable housing, or payment of commuted sums, should be phased with the rest of the development" (revised policy HOU3). The phasing will normally be achieved through the use of a planning condition (paragraph 5.14).
HOU10	The Emerson Group (204)	Support	Streamlining the Section 106 process is supported	Support Noted.	None.
HOU10	The Emerson Group (205)	Object	Phasing should be amended to require 50% of affordable housing before 60% of open market housing has been occupied and all of the affordable before 90% of open market housing has been occupied.	Disagree. The city council considers that policy in the draft SPD is too prescriptive, and that the phasing should be the subject of negotiation.	None, although the policy has been amended so that "the construction of the affordable housing, or payment of commuted sums, should be phased with the rest of the development".
HOU10	Barratt (Manchester) Ltd (215)	Object	It is not practical to impose arbitrary percentages without any knowledge of the location of the affordable units within the site and its configuration. An alternative would be for the Section 106 Agreement relating to the site to include a negotiated delivery formula.	Agree that the percentages in the draft SPD are too prescriptive. Amend the document to change the phasing approach.  The phasing approach will normally be achieved through the use of a planning condition (revised paragraph 5.14), although it may be possible in some circumstances to use a planning obligation.	Delete phasing requirements as set out in the draft policy. Amend the document to state that "The construction of the affordable housing, or payment of commuted sums should be phased with the rest of the development".  Amend the document to state that "...phasing will normally be achieved through the use of a planning condition".
HOU10	Countryside Properties (Northern) Ltd (262)	Support with conditions	We would support the use of clear and unambiguous Section 106 Agreements, but would not advocate that these are submitted from the outset when negotiation on a range of issues may not have been concluded.	See council's response to Bellway Homes (representation 104 above).	See proposed changes in response to Bellway Homes (representation 104 above).
HOU10	Countryside Properties	Support with conditions	Whilst we accept in principle the delivery of a specified proportion of	Agree that the phasing of the affordable and open market housing	Amend the document by deleting the phasing requirements in draft Policy

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	(Northern) Ltd (263)		affordable units relative to the market housing on a site, in line with Circular 6/98, para 34, we do not agree with the prescriptive approach set out in the policy. There needs to be greater flexibility to negotiate a phasing programme with the Council and any RSL partners.	should be the subject of negotiation.	HOU10. The guidance now states that "The construction of the affordable housing, or payment of commuted sums, should be phased with the rest of the development" (revised policy HOU3). The phasing will normally be achieved through the use of a planning condition (revised paragraph 5.14).
HOU10	McCarthy and Stone (318)  Peel Investments (North) Limited (420)	Support with conditions	The principle of requiring trigger points for affordable housing delivery via S106 agreements is accepted. There may be circumstances of site design and layout, or the need to fund other infrastructure cost, or the delay in an RSL being able to take up the affordable housing that justify later trigger points than those identified by Policy HOU10. However, in general the intentions of this policy could be supported with some flexibility where justified.	Agree that flexibility is required.	See proposed changes in response to Countryside Properties above (representation 263).
HOU10	Cllr Geoff Ainsworth (464)	Observations	Will projected sales values of a development be specified in a s106 obligation - such that safeguards to the recovery of any additional contribution in consequence of house price inflation (in excess of costs) exists?	No. It is not appropriate to require open market housing to be sold at a particular price.	None.

## Policy HOU11 – Allocating the Affordable Housing

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU11	Bellway Homes (106)	Object	The policy is unnecessary and should be incorporated into supporting text. Reference to intermediate housing contradicts the push for rented accommodation as the preferred option in HOU7.	<p>Disagree that the policy is unnecessary. The council considers that the policy provides clarity and transparency to developers whose schemes include an element of affordable housing.</p> <p>Disagree that the reference to procedures for allocating intermediate housing is contrary to the push for social rented units in HOU7. Draft SPD policy HOU7 states that the preference is for housing to be secured in the form of social rented units. However it does not preclude intermediate housing being suitable, in particular circumstances. Therefore, it is necessary to outline how such housing is to be allocated where it is considered appropriate.</p> <p>Notwithstanding these concerns the council has amended the approach to allocating affordable housing, partly in order to comply more fully with guidance in Circular 6/98.</p>	<p>Amend the document to state that "Nominations for the occupancy of affordable housing provided through the planning system should be approved by the city council" (revised Policy HOU6).</p> <p>Amend the reasoned justification to state that in the case of social rented units these should normally be allocated through the council's choice based lettings system, although there may be circumstances where it is appropriate to accept nominations through other means.</p> <p>Additionally amend the reasoned justification to state that there is no current system for allocating shared equity, shared ownership and discounted market housing, although the city council is seeking to develop an allocations policy. In the meantime, in accordance with paragraph 19 of Circular 6/98, priority will be given to Salford residents, then persons employed locally or with local connections. If the housing remains unallocated after a reasonable amount of time the criteria would be widened to ensure the affordable housing is occupied by those in need.</p>
HOU11	George Wimpey	Object	The council cannot dictate the allocations process for affordable	Agree that the council should not use conditions or obligations to	None as a result of this representation, although changes

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	Manchester Ltd (173)		housing as it is contrary to Circular 6/98 para 18 which states "the local planning authority should not use conditions or planning obligations to control directly the allocation of housing to nominated individuals".	control the allocation of housing to individuals. The allocation of social rented units will be in accordance with the Choice Based Letting System, and intermediate housing through an allocations policy to be developed by the city council. It will not be through conditions or obligations.	have been made to the document (see above).
HOU11	Countryside Properties (Northern) Ltd (264)	Object	<p>Where units have been transferred to an RSL we are happy to leave nominations to the RSL and the Council.</p> <p>However, other delivery mechanisms need to be addressed such as market discounting and shared ownership where an RSL may not be involved. In such circumstances, it would be appropriate to introduce a cascade mechanism as set out in Circular 6/98, para 34 (b).</p>	<p>Note support for leaving nominations to the city council / RSL.</p> <p>The council agrees that other affordable housing delivery mechanisms are needed. The draft SPD has been amended to state that shared ownership, shared equity and discounted market housing may all be appropriate forms of affordable housing. These will be allocated in the accordance with an allocations policy to be developed shortly. In the meantime the Council will adopt a cascade mechanism to the allocation of units.</p>	<p>Amend the document to state that "Nominations for the occupancy of affordable housing provided through the planning system should be approved by the city council" (revised Policy HOU6).</p> <p>Amend the reasoned justification to state that there is no current system for allocating shared equity, shared ownership and discounted market housing, although the city council is seeking to develop an allocations policy.</p> <p>In the meantime, in accordance with the cascade mechanism in paragraph 19 of Circular 6/98, priority will be given to Salford residents, then persons employed locally or with local connections. If the housing remains unallocated after a reasonable amount of time the criteria would be widened to ensure the affordable housing is occupied by those in need.</p>
HOU11	McCarthy and Stone (319)  Peel	Object	The Choice Based Lettings Policy should be appended to the SPD to enable an element of consultation on this, and to allow the	Disagree that the Choice Based Lettings Policy should be attached to the SPD, and should be consulted upon as part of the SPD	Amend the document to state that the city council's Choice Based Lettings System will normally be considered the most appropriate vehicle for

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	Investments (North) Limited (421)		development industry to assess the impact it may have on individual developments. If for example a priority was given entirely to homeless or very vulnerable applicants this may not be appropriate on all developments.	process (note that the council intends to adopt Planning Guidance as opposed to an SPD). The Choice Based Lettings Policy has been subject to separate consultation, and it is considered an appropriate tool for allocating social rented housing. However the council recognise that the choice based letting system may not always be the most appropriate vehicle.	ensuring that affordable housing is occupied by those genuinely in need, "although there may be instances where it is appropriate to accept nominations made through other means" (revised paragraph 5.30).
HOU11	McCarthy and Stone (320)  Peel Investments (North) Limited (422)	Object	Further thought may need to be given to intermediate housing provision especially in circumstances where no RSL is involved as highlighted in earlier comments made in response to Policy HOU7.	Agree that further details are needed as to the allocation of intermediate housing.	Amend the document to state that "Nominations for the occupancy of affordable housing provided through the planning system should be approved by the city council" (revised Policy HOU6).  Amend the reasoned justification to state that there is no current system for allocating shared equity, shared ownership and discounted market housing, although the city council is seeking to develop an allocations policy.  In the meantime, in accordance with the cascade mechanism in paragraph 19 of Circular 6/98, priority will be given to Salford residents, then persons employed locally or with local connections. If the housing remains unallocated after a reasonable amount of time the criteria would be widened to ensure the affordable housing is occupied by those in need.

<b>Paragraph/ Policy</b>	<b>Respondent / Rep No</b>	<b>Nature of Response</b>	<b>Council's Interpretation of Representation</b>	<b>Council's Response</b>	<b>Proposed Changes</b>
Para 6.27	Countryside Properties (Northern) Ltd (265)	Object	The reference to those in "need being drawn in from elsewhere" is of concern. If units are not required by residents of Salford then the requirement for affordable units should no longer apply.	Disagree that affordable units should only provide accommodation for Salford residents. The city council proposes to change this element of the document, so as to follow a cascade approach to the allocation of affordable housing. However, the very high levels of local demand make it unlikely that it will need to be used in most situations.	Amend the document (in accordance with paragraph 19 of Circular 6/98) to state that the city council is seeking to develop an allocations policy in the near future. In the interim, priority will be given to Salford residents then persons employed locally or with local connections. If the housing remains unallocated after a reasonable amount of time the criteria would be widened to ensure that a suitable occupant was found.

## Policy HOU12 – Maintaining the Supply of Affordable Housing

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU12	Bellway Homes (107)	Object	The policy is considered unnecessary and should be incorporated into supporting text	Agree that parts of the policy are unnecessary. However, it will be important to refer to how receipts from the sale and staircasing of intermediate housing should be recycled, although this need not be in a separate policy (and it is instead to be included in revised policy HOU6).	Amend the document to include in revised Policy HOU6 the following: "Where occupants increase their ownership of intermediate housing secured through the policies of this SPD, the council would encourage recycling of the receipts to provide additional affordable housing within Salford".
HOU12	Countryside Properties (Northern) Ltd. (266)	Object	We see no reason why, if units have been transferred to an RSL that they should then be selling them. However, if such circumstances were to occur, we support the requirement for all receipts to be recycled.	The Housing Corporation controls how RSLs sell properties and recycle receipts, and therefore such references have been deleted.	None.
HOU12	McCarthy and Stone (321)  Peel Investments (North) Limited (423)	Object	<p>The greater the restriction imposed on an RSL with regards to the future use of non-grant funded stair casing receipts, the greater the impact this will have on the price the RSL can pay the developer for the completed unit.</p> <p>In a grant funded situation, the original grant if released through staircasing must be recycled as Recycled Capital Grant Funding (RCGF). However, there is no current restriction upon an RSL to spend this in the same Local Authority Area it originated from.</p> <p>The Housing Corporation are also</p>	Agree in part that there can be no requirement for RSLs to recycle receipts from staircasing into affordable housing schemes within the city, although it should still be encouraged.	<p>Amend the document to state that "Where occupants increase their share of ownership of intermediate housing secured through the policies of this SPD, the receipts should be recycled to provide additional affordable housing within Salford, wherever practicable". (revised policy HOU6).</p> <p>Expand on the revised policy in the justification to state that "The sale of social-rented housing to occupants under the Right to Buy initiative, and "staircasing" within shared equity schemes whereby the occupants purchase an increased proportion of the equity, means that some</p>

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			in the process of considering revising this element of the grant funding process, and revisions may seek to control non grant funded stair casing receipts also. On this basis Policy HOU12 may be superseded by other legislation. For the moment there is no lawful basis upon which to require a developer to support this approach.		affordable housing will effectively be taken out of the supply. Those receiving the receipts of such sales are encouraged to recycle those receipts into the provision of new affordable housing within Salford, to ensure that the benefit of affordable housing provided through the planning system is not lost to outside of the city. It is recognised that this cannot always be a requirement of RSLs because of their funding arrangements, but in private schemes (i.e. where the affordable housing is not being delivered through an RSL) any receipts should be recycled back into additional affordable housing within the city" (revised paragraph 5.33).
HOU12	Contour Housing Group (451)	Observations	Consider linking this to the RCGF policy of the Housing Corporation, which already set out how RSL's use such monies	The city council note the Recycled Grant Funding Approach of the Housing Corporation.	Amend the document as in above response to representations from McCarthy and Stone (representation 321) and Peel Investments (representation 423).

## Chapter 7 – Student Housing

### Policy HOU13 – Demonstrating a Need for Student Housing

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
HOU13	Home Builders Federation (275)	Object	<p>It is extremely onerous to expect developers to provide this level of information, whilst the policy will restrict new student accommodation in some localities and will redirect development pressures onto other areas.</p> <p>Assessment of need requires an excessive amount of research to be done by the developer – an indication of how the Council will contribute in terms of available information is required.</p>	<p>Disagree. UDP Policy H7 sets out criteria for when planning permission will be granted for the provision of student accommodation. Criterion i) states, "There is a proven need for the development". The draft SPD policy therefore set out how developers should demonstrate a need for student accommodation. Note that the city council now intend to include Policy HOU13 of the draft SPD within informal guidance (as opposed to within an SPD).</p> <p>It is the UDP rather than policy in the revised document that will restrict new student accommodation in some localities and will redirect development pressures into other areas. The guidance itself does not do this, as it simply expands on how developers can show a need for accommodation. It is not introducing new policy.</p> <p>The amount of information required is not considered to be excessive. The information is needed to allow the city council to be fully satisfied that there is a need for additional student accommodation. It will be</p>	Renumber draft Policy HOU13 as HOU7.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				the responsibility of the applicant to include this information as part of their application. It is not considered appropriate for the city council to effectively provide information in support of an application.	
HOU13	McCarthy and Stone (322)  Peel Investments (North) Limited (424)	Observations	No comment in respect of this policy.	Noted.	Re-number draft Policy HOU13 as HOU7.
HOU13	GONW (362)	Support	It is considered that this is the only SPD policy which appears to be justified in terms of its links with the UDP is policy HOU13.	Support Noted.	Re-number draft Policy HOU13 as HOU7.
HOU13	Central Salford URC (489)	Observations	This policy supplements and clarifies the first condition of UDP policy H7 and should ensure that applications for student housing are properly justified. It is common with the introduction of such policies in other cities with large student populations. It is therefore recommended that this policy is noted.	Observations noted.	Re-number draft Policy HOU13 as HOU7.

## Chapter 8 – Implementation and Monitoring

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Paras 8.1- 8.4	McCarthy and Stone (323)  Peel Investments (North) Limited (425)	Object	There is currently no evidence base to support the majority of this SPD. On this basis it is premature. However, should the intentions of this SPD be supported by an evidence base in the future, the extent of change to the adopted UDP would need to be addressed through a DPD rather than the SPD route as currently drafted.	The city council does not agree that the SPD is based on a lack of evidence. Paragraph 2.21 of the draft SPD states that a detailed analysis of a comprehensive range of housing and other socio-economic data was undertaken, whilst housing market typologies were also developed to assess the health of the housing market in each of Salford's wards (paragraph 2.26). Other information used to inform the draft SPD is set out in paragraphs 2.9 to 2.35 of the draft.  A full and comprehensive reasoned justification has been set out for each policy, amplifying the approach taken by the city council.	None.
Para 8.2	Home Builders Federations (276)	Object	Pre-application discussions at the earliest opportunity are welcomed, although there is concern over availability of resources and the issue of charges for such a service	Welcome the support for pre-application discussions. It is likely that such a service will continue to be provided at no cost, and that there are sufficient resources available.	Delete Paragraph 8.2. Revise paragraph 7.3 to include details on pre-application discussions.
Para 8.5	Home Builders Federations (277)	Observations	The acknowledgement that the effectiveness of the Housing SPD needs to be monitored annually included in paragraph 8.5 is welcomed. This should involve the HBF and the house building industry.	Observations noted. The effectiveness will be monitored in the Annual Monitoring Report. This is a public document that the HBF will be able to comment on.	None.
Para 8.6	Community Housing, SCC (11)	Observations	Add the number of bungalows and ground floor apartments (and therefore wheelchair accessible	Disagree. The requirements for Lifetime Homes and Disabled homes standards have been	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			homes) to the list of monitoring factors.	deleted.	
Para 8.6	McCarthy and Stone (324)  Peel Investments (North) Limited (426)	Object	<p>Assuming the basis for these policies can be established the list of issues to be monitored should be extended to include:</p> <ul style="list-style-type: none"> <li>• Contribution to affordable housing supply through other non planning sources of supply.</li> <li>• The extent of commuted sums generated, the circumstances in which they were accepted, and how they were used to provide additional affordable housing.</li> <li>• Justification for variation to policy, which will help to inform future policy needs. This will need to relate to overall percentage and tenure.</li> </ul> <p>If monitoring such as this were in place it would also help to inform the evidence base, justify an appropriate policy response for future consideration through a DPD, and then enable robust revisions to be made through SPD in the future.</p>	<p>Agree that it is appropriate to monitor the use of commuted sums.</p> <p>Monitoring of affordable housing from sources outside of the planning system will be undertaken as part of the Affordable Housing Strategy monitoring, and will inform any potential need for the document to be reviewed. However, it is not considered to be an indicator of the document itself.</p>	<p>Amend the document to include a new indicator which reads:</p> <p>“Average annual value of affordable housing commuted sums generated, and how they were used to provide affordable housing” (indicator 4, revised paragraph 7.13).</p>

## Appendix A - Lifetime Homes Accessibility Standards

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Appendix A	McCarthy and Stone (325)  Peel Investments (North) Limited (427)	Object	The need for Lifetime Home Accessibility Standards to be applied to all new residential development has not been justified by any evidence base of need. This can only be an aspiration, and will not be appropriate for all developments, especially private housing.	The requirement for all homes to be built to the Lifetime Homes Standard is contained in Policy L4 of the Draft Regional Spatial Strategy for the North West. The Examination in Public process will consider the merits of such a requirement, and if it remains in RSS then it will become part of Salford's Development Plan, and would therefore be a requirement of developers. It is therefore considered that the policy relating to Lifetime Homes. as in the draft SPD. should be deleted, as it is unnecessary (and if such an approach cannot be justified through the Examination in Public process, potentially inappropriate).	As Appendix A links to draft Policy HOU4 (which itself is to be deleted), delete this Appendix.

## Appendix B – Wheelchair Housing Standards

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Appendix B	McCarthy and Stone (326)  Peel Investments (North) Limited (428)	Object	<p>There is no evidence base to support the need to require these standards to be met for all bungalows and ground floor apartments. Furthermore it will not always be appropriate to apply these standards to large flatted blocks.</p> <p>For example the parking requirement - In a block of flats with 20 ground floor apartments, and just one front entrance, how would it be possible to accommodate under cover parking, located adjacent to the front entrance all at 3.6 m wide with a path 900mm wide connecting the front door, parking bay and adjacent road?</p>	The council considers that there is insufficient linkage between UDP Policy DES2 and the requirement for wheelchair standard housing in bungalows and ground floor units. Therefore policy HOU4 is to be deleted.	As Appendix B links to draft Policy HOU4 (which itself is to be deleted), delete this Appendix.
Appendix B	McCarthy and Stone (327)  Peel Investments (North) Limited (429)	Object	<p>Policy DES 2 relates to the estate layout and general design, and cannot be seen to support such onerous requirements which in reality cannot be practically delivered. At best this policy should be an aspiration in supporting text to a more clearly defined supporting policy in the UDP or LDF replacement document.</p> <p>If a HMA identifies a particular problem in respect of disability, perhaps the policy could aim to secure an element of bungalow provision, or that an appropriate</p>	See above.	See above.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			percentage of the development should seek to meet these standards where practicable.		

## Appendix C – Affordable Housing Needs Assessment

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Appendix C	George Wimpey Manchester Ltd (174)	Object	The Affordable Housing Needs assessment in Appendix C does not follow the DETR July 2000 Methodology - Local Housing Needs Assessment: A Guide to Good Practice and is therefore not rigorous or robust enough to justify the implementation and operation of UDP Policy H4.	The city council used the more up to date methodology for assessing housing needs contained in December 2005 ODPM Draft Practice Guidance entitled "Housing Market Assessments: Draft practice guidance". This is the most recent guidance which deals with assessing affordable housing need and is considered robust and credible. The Draft Practice Guidance builds upon an earlier Discussion Draft (March 20056) that was subject to public consultation.	None.
Appendix C	George Wimpey Manchester Ltd (175)	Object	Looking at the housing register to establish need and applying a range of arbitrary adjustments is not appropriate given the complexity of the housing market in Salford. An assessment also needs to look at intermediate housing.	In assessing affordable housing need the city council has used the methodology contained in the ODPM December 2005 "Housing Market Assessments: Draft practice guidance". The council agree that this model is primarily based on the Housing Register, although other elements and data sources are built into the model.  The provision of intermediate housing will be able to meet the needs of some of those on the Housing Register, although it is accepted that there may be additional demand from other households as well.	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				<p>Page 39 of the guidance sets out the data sources for the different elements of the model. The city council have only used those data sources highlighted in Table 5.3, and so the assessment is in line with the draft guidance. The guidance is clear that where estimates re used, "these should be set out in a clear and transparent manner". In Appendix C the council have done this.</p> <p>In assessing the most appropriate form of affordable housing regard will be had to factors such as existing supply of affordable housing in area, characteristics of households in need; and local house prices (revised policy HOU4)</p>	
Appendix C	ASK Developments Limited (246)	Object	<p>The City Council recognises that the Housing Register based approach to estimating the housing needs of the area is likely to identify mainly households in need of rented accommodation; however, it is then used as the basis for arguing that only social rented housing should be provided. This seems at best to be a circular analysis.</p> <p>There appears to be no basis for analysing the need for other forms of recognised affordable housing tenures (for example Shared Ownership, Discounted Market Sale, Sub market rent,</p>	<p>Agree that the use of the ODPM model is likely to identify mainly households in need of social rented housing, but some of that demand could potentially be satisfied through intermediate housing as some households will be seeking social rented housing because they cannot access open market housing without assistance.</p> <p>In assessing the most appropriate form of affordable housing regard will be had to factors such as existing supply of affordable housing in area, characteristics of households in need; and local house prices (revised policy HOU4).</p>	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Appendix C	ASK Developments Limited (247)	Object	<p>Affordable market housing).</p> <p>One might reasonably expect to see a properly constructed Housing Needs Survey underpinning the introduction of such an influential policy rather than a simple analysis of existing data held for an entirely different purpose within the Housing Register.</p> <p>The general approach appears to lack any form of rigorous, on the ground, research in connection with the assessment of local housing needs. For example, the opportunity to identify specific locations where priority needs exist for certain types of affordable housing appears to have been lost.</p>	<p>The city council has assessed the need for affordable units across the city using an ODPM Affordable Housing Needs model contained in Housing Market Assessments Draft Practice Guidance (December 2005). This is considered by the DCLG to be satisfactory for assessing need.</p> <p>The Draft Practice Guidance is clear that "Whilst it is possible to undertake more localised assessments using geo-coded data (where available) and information from <i>housing surveys</i>, partnerships should be aware that there are limits to the accuracy and robustness of estimates at smaller scales". The guidance therefore differs from the objector in its view of the benefits of primary data when compared to secondary data.</p>	None.
Appendix C, ODPM Need Model	McCarthy and Stone (328)  Peel Investments (North) Limited (430)	Object	<p>Reliance upon draft guidance is inappropriate, as this is likely to change considerably if in fact it is released at all in this format. Many of the representations made in respect of this guidance were in respect of reliance on very variable and often poor quality secondary data, that cannot be considered an appropriate substitute for independent data collected through a housing market assessment.</p> <p>The work that has been undertaken</p>	<p>In assessing Affordable Housing Need the council has used a model contained in December 2005 Draft Practice Guidance. It is not considered that using a model from draft guidance is inappropriate.</p> <p>Page 37 of the draft guidance is clear that "The model is based upon the Basic Needs assessment Table developed for the 'Local Housing Needs Assessment: A Guide to Good Practice' by Bramley et al (DETR, 2000). Building upon the</p>	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>in respect of Salford's Housing Waiting List cannot be considered to be a substitute for the full Housing Market Assessment referred to in Adopted UDP Policy H1, or the supporting text to Policy H4. Nor does it provide the necessary and varied range of information to support many of the policies being proposed in this Housing SPD.</p>	<p>previous model, it aims to provide greater clarity and consistency of approach by setting out precisely how to calculate numbers at each step". An almost exact version of the model in the draft Practice Guidance was also contained in a Discussion Draft (March 2005). It is therefore considered to be robust.</p> <p>The Draft Practice Guidance is clear that "Whilst it is possible to undertake more localised assessments using geo-coded data (where available) and information from <i>housing surveys</i>, partnerships should be aware that there are limits to the accuracy and robustness of estimates at smaller scales". The guidance therefore differs from the objector in its view of the benefits of primary data when compared to secondary data.</p>	
Appendix C, Assumptions	<p>McCarthy and Stone (329)</p> <p>Peel Investments (North) Limited (431)</p>	Object	<p>Many of the assumptions in this section do not relate well to ODPM (now DCLG) existing or emerging Guidance on Housing Market Assessments. The quality of data contained in Housing Registers is limited in extent (i.e. does not include financial information).</p> <p>It is clear from some of the assumptions used by the Council, that the Salford Housing register is a very open list that contains people who would be outside the ODPM definition of Housing Need. The</p>	<p>The Draft Practice Guidance is clear that "Whilst it is possible to undertake more localised assessments using geo-coded data (where available) and information from <i>housing surveys</i>, partnerships should be aware that there are limits to the accuracy and robustness of estimates at smaller scales".</p> <p>The council has followed the steps set out in the guidance in full, and have used the data sources set out on page 39, table 5.3. the council</p>	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			basis upon which the Council have tried to remedy the inadequacies of the Housing Waiting List are unclear.	accept that various assumptions have been made in using the model. However, the draft Practice guidance is clear that where estimates are used, "these should be set out in a clear and transparent manner". In Appendix C the council has done this.	
Appendix C, Stage 1 Assessing Need	McCarthy and Stone (330)  Peel Investments (North) Limited (432)	Object	The basis for including 22.5% of those applicants that have not been awarded 'in need' credits is unclear. If this allowance is removed from the calculations the overall shortfall would reduce from 603 to 465 per annum.	Disagree that the basis for including 22.5% is unclear.  The draft SPD explains that Stage 1 of the model looks at assessing current need. It has been calculated that there are 6,346 households without credits, who have a local connection and have been on the housing register for less than three years, and are expected to be unable to meet their own needs in the open market over the next twelve months. It is assumed that 1,428 of these household are in current need (22.5% of 6,346). The 22.5% comes from an assumption based on a past trend that 22.5% of households (having a local connections and having been on the register for less than 3 years) stay on the register the following 12 months and are therefore considered to require affordable housing.  The reason those without credits is included is that there may be people without credits who require	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
				affordable housing. The Housing Register does not give credits for affordability issues.	
Appendix C, Stage 2 – Available Stock to Offset Need	McCarthy and Stone (331)  Peel Investments (North) Limited (433)	Object	This section is poorly explained. All those occupying social stock should be removed from the Table 2.1 calculation, as meeting their needs would also free up further social housing. If this included all those with and without credits a total of 2,444 would be removed from the calculation this would further reduce the bottom line from 465 to 303.	Row 2.1 is the number of those identified in need in row 1 of the table who currently live in social rented housing. This is not all of those on the Housing Register, which is what the representation effectively suggests. If it were, then this would effectively be assuming that all of the Households on the Housing Register should be included in the model, which would increase row 1 to 12,791.	None.
Appendix C, Stage 3 – Newly Arising Need	McCarthy and Stone (332)  Peel Investments (North) Limited (434)	Object	Steps 3.1 and 3.2 of the model rely on Government Household Projection data in 2003, and an assessment that is not evidenced in anyway but concludes that 50% will not be able to afford open market housing. This methodology is not fully supported by Chapters 4 or 5 of the emerging Guidance.	The draft SPD, Appendix C, states that household projections indicate an average household growth of 500 households per annum over the next ten years. It is considered that 50% of these are considered likely to be unable to meet their needs in the open market, based on household incomes, entry level rents and property prices, and other research work and intelligence (such as the Manchester Salford Pathfinder Research Foresight and Intelligence programme).	None
Appendix C, Stage 4 - Future Supply of	McCarthy and Stone (333)  Peel Investments (North) Limited (435)	Object	The guidance recommends a 3 year average is used. If a 3 year average is used this would increase the average number of re-lets from 3453 up to 3590. This would further reduce the overall shortfall of housing need by another 137 units per annum. Taking into account the results of the 2003 Housing Needs	The December 2005 Draft Guidance does not advocate using a three year average. Rather it states that "Partnerships should estimate the number of existing households falling into need each year by looking at recent trends" (page 42, step 3.3).	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			Study, and the potential over estimation of Newly Arising Need in stage 3, this further reduction of 137 is likely to remove the need for additional affordable housing supply all together.	In any regard, it is considered more appropriate to use a longer trend base. It is considered that this makes the figures more robust and less prone to temporary anomalies.	
Appendix C	McCarthy and Stone (334)  Peel Investments (North) Limited (436)	Object	<p>TENURE OF AFFORDABLE HOUSING</p> <p>Appendix 3 provides no further assessment to accompany the overall annual requirement for additional affordable housing.</p> <p>Chapter 5 of the emerging Guidance states "Affordable housing is usually built in response to identified need. Nevertheless, households in need may chose to live in other types of housing such as private rented (possibly with the use of housing benefit) or housing that would be classified as unsuitable, even though they are eligible for affordable housing. Furthermore, in parts of the Country where there is an excess of supply of social housing, it is demand for such housing which is of interest in determining the future stock".</p> <p>Line 2.2 of the Model on page 48 of the Housing SPD confirms that there is such a surplus in Salford. On this basis further work will need to be done to assess the likely demand for additional affordable housing especially in the form of</p>	<p>The justification for the overall annual requirement for affordable housing was set out in the reasoned justification to Policy HOU5 of the draft SPD. It is considered that this justification should be amplified in the revised document.</p> <p>The council notes that line 2.2 of the needs model identified a surplus LA/RSL stock of 331 dwellings. However it is not correct to state that this may indicate that there is not a need for any additional social rented affordable housing stock. Taking into account other elements of the model the council estimate that there is actually an annual requirement of an additional 357 social rented units to reduce current need (i.e. even before taking into account newly arising need 2006-16). It is likely that a high proportion of those LA/RSL vacant properties are scheduled for demolition.</p> <p>The council notes the importance of the intermediate housing market.</p>	Amend the document to provide further justification for the 20% affordable housing requirement.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			<p>social rented housing.</p> <p>Chapter 6 of the emerging Housing Market Assessment Practice Guide discussed the Intermediate Market in more detail, including the role of intermediate housing in meeting need, and how to assess the demand for intermediate housing need. Close attention should be paid to this element of the Guidance by the Council when commissioning the new Housing market Assessment (especially due to the limited existing stock of intermediate housing).</p>		
Appendix C	<p>McCarthy and Stone (335)</p> <p>Peel Investments (North) Limited (437)</p>	Object	<p>Much of the detail in Chapter 7 of the emerging Housing Market Assessment Practice Guide (in relation to evidence being robust and credible and monitoring) has been ignored. The Guidance states that Partnerships should "clearly explain the limitations of data sources and any assumptions or judgements used throughout the assessment. Partnerships should bear in mind that as the assessment is an analytical exercise, its findings should be presented in an objective and transparent manner. Linked to this, they will need to set out what quality control mechanisms have been used to ensure assessments outputs are statistically robust and fit for purpose".</p>	<p>The council has followed the steps set out in the Housing Market Assessments Draft Practice Guidance in full, and have used the data sources set out on page 39, table 5.3. The council accept that various assumptions have been made in using the model. However, the draft Practice guidance is clear that where estimates are used, "these should be set out in a clear and transparent manner". In Appendix C of the draft SPD the council did this.</p>	None.
Appendix C	McCarthy and	Object	PARTNERSHIP WORKING	The city council will ensure that	None.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
	<p>Stone (336)</p> <p>Peel Investments (North) Limited (438)</p>		<p>Any considerations of how the outputs relate to policy questions should clearly identify where the partnership is making judgements or interpretations based upon the assessment findings. It will be important to involve all members of the partnership in drafting the assessments findings, particularly any analytical or interpretative work undertaken. This clearly has not been undertaken by Salford City Council to date.</p> <p>As the city council are commissioning a HMA, Levvel (on behalf of its clients) would like the opportunity to comment on both the Brief for the Housing Market Assessment Work, and to be consulted upon early draft findings as and when they are available. Involvement of the development industry in converting its findings into plan policy would also help to facilitate any dramatic changes in approach that may result.</p>	<p>Levvel (the Consultants used by McCarthy and Stone and Peel Investments) are consulted on early findings from the Housing Needs and Demand Study commissioned by Manchester and Salford Councils and the HMR Pathfinder.</p>	

## Appendix D – Financial Appraisal of Schemes

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Appendix D	ASK Developments Limited (245)	Object	<p>Appendix D offers no detail as to how Financial Appraisals will be assessed by the City Council, nor assurances as to the confidentiality of any commercial data which may be required by the Council.</p> <p>A practical financial model is required to be produced which is populated by a range of reasonable commercial assumptions in relation to profit levels, costs, on-costs, and other S106 costs, in order to offer the market some confidence as to how this arrangement will operate.</p>	The city council has deleted the requirement for developers to enter into "open book" negotiations. However, developers may be required to submit financial information, on a confidential basis where appropriate.	<p>Delete Appendix D of the Draft SPD, and the requirement for open book negotiations (paragraph 6.8).</p> <p>Amend the document to state that a reduced proportion of affordable housing may be appropriate where a development would otherwise become unviable. "In such circumstances, the evidence provided by the developer should include a financial statement that has been professionally certified. This will be treated on a confidential basis, where appropriate" (revised paragraph 5.9).</p>
Appendix D	ASK Developments Limited (337)	Object	Appendix D calls for the developer to disclose a combined percentage of profit and overheads. Clearly, these two issues are very different and should therefore not be combined. For example, a company which resources all their own project management work internally will have a significantly higher overhead than one which outsources this and similar functions. This is entirely independent of profitability.	See above response to representation 245 from ASK Developments.	See proposed changes above.
Appendix D	McCarthy and Stone (338)  Peel Investments (North) Limited (439)	Object	Until further guidance is received at the national level in this respect, we will all still be arguing over what is an appropriate price for land, and what is a reasonable developer profit. This financial appraisal approach needs to be based on	See above response to representation 245 from ASK Developments Ltd..	See proposed changes above.

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
			more detailed guidelines and be based on parameters agreed with the development industry.		

## Appendix E – Registered Social Landlord Partners in Salford

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Appendix E	McCarthy and Stone (339)  Peel Investments (North) Limited (440)	Object	<p>A list of suitable RSL partners is helpful, but paragraph 17 of Circular 6/98 prevents prescription. On this basis we support the ability to bring in a new RSL where appropriate.</p> <p>This section could also be extended further to identify that non RSL affordable housing providers may also be appropriate in certain circumstances, as in fact identified as an option in Policy HOU7.</p>	Agree that paragraph 17 of Circular 6/98 prevents prescription of RSL partners.	<p>Insert the following paragraph into the document:</p> <p>“The city council would encourage developers to bring forward affordable housing in partnership with the city council's lead Registered Social Landlords (RSLs), details of which are listed in Appendix B. However, schemes may also be developed in conjunction with other RSLs / organisations, although these must be approved by the city council” (revised paragraph 5.17).</p>

## Appendix F – Useful Contacts

Paragraph/ Policy	Respondent / Rep No	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Appendix F	McCarthy and Stone (340)  Peel Investments (North) Limited (441)		<p>As Salford City Council is such a large organisation, it may be more appropriate for the contact list to include specific contact names for specific areas of interest such as:</p> <ul style="list-style-type: none"> <li>• Housing Market Assessment</li> <li>• RSL affordable housing price and availability of grant funding.</li> <li>• Access Officers dealing with disability matters and lifetime homes standards.</li> <li>• Choice based lettings team, and specific advice on the type of need in certain areas as identified by the Housing Waiting List.</li> </ul>	Do not agree. The council now considers that the first point of contact should be Urban Vision (which provides the city council's Development Control functions), who will then consult and co-ordinate with other relevant sections within the council as necessary.	Delete Appendix F (Useful Contacts) . Amend Implementation and Monitoring Chapter to set out contact details for Urban Vision, who should be contacted prior to the submission of a planning application to discuss the issues arising out of the document.