

URN	Name	Comment Number	Comments Received	Responses	Amendments to SPD	Date
1	J E Thomas	1	Yes, how about affordable council tax, I had to struggle to get my house on less money why shouldn't these people give up a few glasses of beer etc as I did	Noted	None	08/10/2007
2	Cllr J Lea	1	Thanks a really helpful document	Noted	None	08/10/2007
3	W Wheatley	1	Satisfied living where he does. Thinks him and his neighbours should have access to the garden from their living rooms. Would like to thank NWBC for finding him the house after his second wife died	Noted	None	08/10/2007
4	R & J Brown	1	Can't comment-never had any involvement - married over 50 years. More detail for single divorced women who end up with no money and nowhere to live	Provision of Affordable Housing should be accessible to all sectors of society/community regardless of marital status. Issue is access to & availability of "Affordable" housing.	None	08/10/2007
5	Kathleen Edwards	1	No further housing in villages unless for Local Need only	Local Need is an element of Affordable Housing. Need relates to affordability as well as "Local" ties/justification.	None	08/10/2007
6	Mr B Franklin	1	A total of 23 people in Arley feel there is a need for AH. 13 indicated they wish to rent. Majority want to buy with some form of help.	Noted: Assume comments are from recent Arley Parish Housing Needs Survey. No change to SPD. Await formal publication of Parish Survey to confirm need?	None	08/10/2007
		2	Old Arley no one wants Affordable Housing	as above	None	
		3	Some older people want bungalows if there is a need for this accommodation	as above	None	
		4	People don't want Arley to become an overspill from other areas	as above	None	
7	Mrs Brideaux	1	No Comment	Noted	None	08/10/2007
8	DRC	1	No Comment	Noted	None	08/10/2007
9	Robert Williams	1	The adopted policies effectively restrict houses in village locations. These policies are harmful to village life	Adopted Policies reflect National and Regional Planning Policies of rural countryside restraint/constraint. Restriction expressed likely to relate to unrestricted speculative housing in unsustainable locations and smaller settlements/hamlets. The "Affordable" Housing Policy enables this restraint/constraint to be waived where justified. Hence enables opportunity for access to housing that is otherwise unavailable due to cost and availability. Increased house prices have the greatest effect on village life, driving out and preventing access to housing by those people on lower to middle incomes. Social and economic mix of population therefore skewed to the well-off and elderly (who remain in their houses and are also unable to move in or between local villages due to lack of suitable, affordable alternative housing).	None	08/10/2007
				Unrestricted Housing Policies would have to allow hundreds of houses to be built in villages before any discernible impact on local house prices would occur, and the impact on the character of the villages as well as on the environment and countryside would be considerable. The Affordable housing Policy seeks to maintain village life and socio/economic mix not destroy it.	No Change	

2	Current planning proposals considered to have detrimental effect on villages in N Warwickshire. Green Belt has downward effect on Economic Development. Effect is to drive people away from villages into town locations creating rural refugees, housed in high density complexes alien to their upbringing. Villages become wealthy retirement dormitories with services closing, lacking and halting organic growth and young families forced to look for housing in local towns. Sustainable approach used as an argument for the policies simply reflects the difficulties, such as service loss, caused by the restricted policies, noted above	Noted: Comments as above	No Change	
3	Why does area need so much social rental?	Needs identified through Fordhams study indicates that only through social rental will housing be truly "affordable" to those in housing need. Properties to buy through various shared ownership or shared equity methods are still so costly as to be effectively unaffordable to many on lower to middle incomes (below average household incomes/wages) and majority of those in housing need.	No Change	
4	Potential of creating social dependency through occupants/families becoming used to living on social welfare and accommodation provided by the state. It is in the interest of the council to ensure general policies are restrictive as this will ensure the wealth and aspiration of people in the area will remain low as the more affluent residents rarely use council services, whereas more vulnerable people rely on the council and social workers to assist them in their lives. This	Noted: Not considered relevant to SPD. Comments reflects a misunderstanding of what both the Planning Policy and the Council seeks to achieve. SPD deals with Housing Affordability, which affects a wide range of incomes and social/economic circumstances not just people on social welfare. Many employed people in the Borough who do not depend, or rely on Council or Social services are therefore affected, yet struggle to find truly affordable housing regardless of tenure and landlord (private or public).	No Change	
		With regards to the "rare" use of Council services by so called "affluent" residents, It is assumed the affluent residents in question do not have any public domestic (or trade) waste collections, never use public highways including roads, footpaths and pavements (lit or unlit), and of course only those privately serviced/cleaned/maintained. They must never use libraries, public leisure facilities or services (swimming pools, playing fields, sports halls, gyms etc), attend any form of public meeting at a Parish or Council Hall/premises, do not use any public	No Change	
		It must also be assumed that they never eat from a restaurant, pub or similar food emporium/outlet that is (or has been) inspected on public health, safety and welfare grounds by the Council's Environmental Health Department and only use private commercial pest control services. In case of flooding problems they must also rely solely on private commercial contractors to provide flood relief (sand bags/pumps etc.) and never seek Trading Standards advice, support or evidence in the event of problems with retail purchases and services, on quality/safety grounds or similar. Possibly they don't vote in General or Local Elections as that helps perpetuate Local Council's existence and would never seek business support, grants, help or advice from Councils Economic Regeneration services or use Council owned	No Change	

				To rarely use Council services they would also have to ignore all Planning advice and would not seek redress through the Planning Enforcement Service when affected by adverse, unauthorised developments adjoining their properties/dwellings, would have to tolerate adverse environmental impacts such as noise nuisance, smoke, smell or similar, as to use the Councils Environmental Team to act against such nuisances would only perpetuate their existence. It is also assumed they consider all natural, historic and heritage buildings/sites/resources are there for the taking, destroying and re-developing regardless of the loss to the country's character, history They must never, ever park in a Council owned and controlled car park but always seek out private NCP type parking, and never, ever bother using any of the Police and Fire services, but use their own private security guards, investigators and legal prosecutors (through the civil courts) to seek redress, while protecting their property from fire by their own private fire team, insurance or service. Finally it is assumed they would expect all charitable or community groups to support themselves without financial or other help and the local, financially marginal, but	No Change	
					No Change	
		5	None of the above were taken into account in analysis of requirements for social housing so therefore cannot support the document.	Noted. No change to this SPD. Where, and if, relevant these issues were considered in the Needs Survey and analysis.	No Change	
10	B Whittington	1	Questioning the clarity of the documents	Unclear comment. Will try and avoid over-use of acronyms or technical "jargon". Use of Glossary should help.	No Change	08/10/2007
11	David Wilson	1	Where can the plans be viewed for the AH, especially Arley. How does this affect me	SPD is note site specific and is not identifying actual affordable housing numbers for settlements. Some clarification/amendments therefore required for Appendices to make this clearer. SPD is to guide and enable affordable housing delivery through planning applications.	No Change to SPD. See Annexe info	08/10/2007
12	Mrs JH Carter	1	No Comment	No Comment	None	15/10/2007
13	Mr Sedgwick	1	Springhill surgery is overstretched now with insufficient parking. The amenities are pushed to their limit.	SPD deals with Affordable Housing need not availability of parking and amenities? Unsure as to point raised?	None	15/10/2007
		2	Why not fill empty houses before building new ones. Enough anti social behaviour in the area without flooding it with more.	Connection not clear, evidenced or understood? Not all occupants /residents of affordable housing are or will be anti-social. Nurses from local surgerty/health centre are likely to be eligible for affordable housing due to their lower income levels yet I am not aware that all nurses are therefore anti-social.	None	
14	John Birch	1	Much of the objection to AH in smaller villages would probably evaporate if it was specifically for people with connections to a particular place such as the development at Baddesley Ensor. Villagers would readily accept expansion of their village for that purpose.	Noted. The Policy specifically enables this type of affordable housing with Local Needs taking precedent for first and second occupants of housing provided. Legal Agreements linked to Planning Consents seek to ensure a Local Needs allocation approach is taken by RSL's, Landlords whether for owner occupier or rental forms of tenure.	No Change	15/10/2007
15	Mr P Spellman	1	No further housing, whether affordable or not, should be built in Arley without/unless further services and infrastructure are provided and existing ones improved	Noted. The SPD is not the vehicle or process that will deliver improved services/infrastructure. This issue/deficiency will need to be established, evidenced and catered for in any new and emerging Planning policies in the Core Strategy of the Local Development Framework.	None	15/10/2007
16	Mr & Mrs Smith	1	Do not want Affordable Housing at the bottom of Frederick Road and the rear of Tremelling Way because there is enough traffic, still coming down here to get through to the	SPD is not site specific and therefore not relevant to traffic issues. This is a matter for consideration either as a result of a Planning Application or through the Local Development Framework/Local Transport Plan	No Change	15/10/2007
17	Mrs L Dewson	1	I wish I knew how much was being paid so I can keep up with it?	Comment unclear/not understood.	None	15/10/2007

18	Tony Lyons WCC Environment & Economy	1	No Comment	No Comment	None	16/10/2007
19	Mrs I C Henn	1	The AHSPD provides a practical guide to NWBC's planning policies. In view of the governments recent ruling that there should be more provision for AH to be built	Noted. Changes to existing Adopted Local Plan Policies will be a matter for the new Local Development Framework and Core Strategy document.	No Change	16/10/2007
		2	I would think this would include some of the present Greenbelt area, where my jointly owned barn is in Corley Moor	Noted. Review of Greenbelt for future development potential is an issue to be considered through the West Midlands RSS Review and the Core Strategy of the Local Development Framework.	None	
20	Mrs Scrivens	1	Priority should be given to the residents children. They have to move out of the village because they cannot afford to buy there. Felt strongly that these children should be given first choice.	Noted. The SPD can take this into account through the identification of any potential "Local" Need and link to affordability. Nevertheless, if local residents children identified as in "Local" housing need are financially capable of accessing existing housing then they will not be considered as in "Affordable" housing need. Prioritising Local need/links in affordable housing allocation through legal agreement should help cover latter point.	No Change	17/10/2007
21	Beryl Allt	1	Sufficient parking provision for all residents particularly in high density areas	Not Relevant	None	25/10/2007
22	Highways Agency	1	No Comment	No Comment	None	26/10/2007
23	SJ Staines FFT Planning	1	Research indicates a need for 6 residential gypsy and traveller pitches - only indicative	Noted. Gypsy and Travellers need presently being considered through a Gypsy and Traveller Accommodation Assessment. Findings will help inform need. Information forwarded to the assessment. Nevertheless, although the SPD covers all sectors of society and different communities to ensure accessible affordable accommodation open to those in identified need, new locations for pitches/sites are not specifically included/catered for. SPD needs additional text to clarify and cover this point/issue and direct this need to the relevant strategy/policy document. Further Policy work will be undertaken through the Core Strategy/LDF.	Additional para 1.5 and amended 2.8 - The SPD does not deal directly with Gypsy and Traveller needs and/or accommodation for pitches. This will be dealt with separately through the 2008 Gypsy and Traveller Accommodation Assessment and the emerging LDF Core Strategy Policies. Nevertheless, the SPD does enable the delivery of Affordable Housing that can, where required or necessary, service Gypsy and Traveller needs for settled, affordable built accommodation. The Council's Housing Strategy 2008-2011 will also address the issue of Gypsy and Traveller needs.	22/10/2007
		2	Is a need for a Gypsy and Traveller Accommodation - needs assessment within the District	See above	See Amendment above	
		3	2004 Housing Act requires Gypsy & Traveller needs to be considered in any wider housing strategy or needs assessment	See above	See Amendment above and amended 2.8 - The definition could/can also accommodate the needs of Gypsy and Travellers for Affordable Accommodation when identified as part of the affordable need, whether through settled, built housing or land/sites for affordable pitches. The provision of pitches would, however, need careful control to ensure their availability and retention in terms of affordability and perpetuity. Provision and management through an RSL would be the preferred route as with social rented housing. The Gypsy and Travellers Accommodation Assessment 2008 deals with general accommodation needs.	
		4	SPD and all other AH strategies or documents need to mention Gypsy & Traveller sites as AH	See above	See Amendment above	

		5	Needs a specific reference in Planning obligations to meet Gypsy/traveller needs in similar way to that for AH	See above	See Amendment above	
		6	Difficulties in identifying and delivering sites- maybe eased by obligation whereby land is provided by developer for sites	Noted: A possible issue for consideration at the LDF Core Strategy issues and options stage. Present Local Plan Policy and SPD does not accommodate off-site land provision by developer unless as an exception to the Policy/SPD.	No Change	
		7	SPD should note that sites managed/owned by LA or RSL are also types of AH. Para 2.8 should include following sentence "This will include consideration of the needs of Gypsies and Travellers for Affordable Accommodation"	Noted. SPD will need text additions and amendments to reflect the issue.	See Amendment above and amended 2.8 - The definition could/can also accommodate the needs of Gypsy and Travellers for Affordable Accommodation when identified as part of the affordable need, whether through settled, built housing or land/sites for affordable pitches. The provision of pitches would, however, need careful control to ensure their availability and retention in terms of affordability and perpetuity. Provision and management through an RSL would be the preferred route as with social rented housing. The Gypsy and Travellers Accommodation Assessment 2008 deals with general accommodation needs.	
24	Mrs I Filmer North Warks Older Peoples Forum	1	No Comment	No Comment	None	31/10/2007
25	Christine Hemmings British Waterways	1	No Comment	No Comment	None	07/11/2007
26	Bob Sharples - Sport England	1	A well thoughtout and constructed document - happy to support..	Noted	None	12/11/2007
		2	Occupants of AH will have an impact on sports facilities	Noted. The emerging Green Space strategy and Open Space and Recreation SPD will cover this issue. Open Space Audit identifies where deficiencies exist within the Borough, which can then be considered as an issue in any subsequent planning applications for housing.	No Change	
		3	Would be remiss of NWBC to exclude AH from having to contribute to new and existing facilities and open spaces via S106 agreements.	Noted. Council will need to consider a number of potentially conflicting issues when considering planning applications and proposals. The Community Plan/Strategy and the Councils strategic priorities Borough wide and by specific settlements will help identify which issue/service or infrastructure need/deficiency will take priority. Where possible/viable development should cater for/accommodate all impacts on services that it generates regardless of type or tenure of housing although this is not always achievable in practice. Development should therefore avoid areas where major service/infrastructure deficiencies exist unless the development can accommodate/provide for its own service/infrastructure needs that it may generate.	No further change necessary as Aff Hsg SPD does not indicate that Open space and Recreation provision will not be sought for Affordable Housing	
27	Theatres Trust	1	No Comment	No Comment	None	13/11/2007

28	Phil Ward - WRCC	1	In para 2.8 would the use of the definition of AH in PPS3 be more consistent.	Noted. The Definition of AH in this SPD reflects that produced in the Adopted Local plan and cannot therefore be changed. This reflects the specific "Local Circumstances" evidenced through the Housing Needs Survey and Public Local Inquiry into the Local Plan.	No Change	13/11/2007
		2	In para 3.27/annexe 5 para 18 a full list of the areas designated in SI no 620 would be useful and more comprehensive.	Noted. Full list of areas excluded for reasons of brevity and as they lie outside North Warwickshire Borough boundary and are unaffected by and not relevant to the SPD.	No Change	
		3	Several references to further details being available on website - is there a danger that these details will change over time and not reflect the original intention in the SPD (eg includes paras 3.8 and Annexe4	Noted. Intention is to regularly update SPD Annexes and same can be done with website links. If changes are major and affect policy content or application then likely that SPD will need reviewing. Emerging Core Strategy will give some guidance/indication on likelihood of this being necessary in near future (3yrs). Additional text clarification needed to re-inforce this point.	Para 3.8 amended/clarified - Future changes and improvements to design standards will be reflected in any review to the SPD and website updates will be reviewed annually.	
		4	Is it the intention in Annexe6 para 1.2 that any person in need of AH must satisfy the residence requirement for a continuous period of 5 years - if so this should be removed as it could be discriminatory under the Race Relations Act and the Code of Practice on Racial Equality in Housing. - if not bullet points might make the intention clearer.	Noted. Point needs clarifying as residents requirements only relevant on those sites where "Local Need" has been specifically identified and used as justification for housing in specific settlements/location where consent for housing (whether affordable or not) would not normally be forthcoming. In addition, for general affordable housing provision the Council Housing allocation Policy seeks to prioritise local settlement/Borough needs first. Unclear as to how this affects Race Relations act as Policy is race neutral. It is intended to reflect a local deficiency and try to ensure development accommodates/services that identified need locally. The policy is not intended to deliver affordable housing to service an international or national housing need for any specific race, creed or culture (or to exclude them) but to help provide for <u>existing residents within North Warwickshire that are in Affordable housing need</u> (regardless of their race, creed or culture!).	Amended Annexe 6, para 1.2 to clarify - In areas and settlements designated as "Rural for Right to Acquire Purposes" as indicated in Statutory Instrument (SI) No. 620, 'The Housing (Right to Acquire or Enfranchise)(Designated Rural Areas in the West Midlands) Order 1997', priority will also be given to those who comply with the above criteria and have been specifically identified for first/initial occupancy of the affordable housing units in the planning application. Note: the above criteria are locational, related to an immediate, existing "Local Need" of an individual/family and are not affected by race, colour, nationality or ethnic origin. See "Allocation of Accommodation Code of guidance for local housing authorities Nov 2002" ODPM/DCLG particularly in terms of establishing 'Habitual Residence' status.	
		5	The priority given to people who previously lived in the parish, surrounding ward area and Borough and those who have a member of their immediate family living in the parish, surrounding ward area or borough is not clear - overall this para is not clear and could lead to difficulties in implementing. annexe 6 para4.3 refers to 5/10 years but it is not clear what is being connected to each of these periods - there is no reference to the means of calculating interest	Noted. Some further clarification and explanation may be necessary.	Amended Annexe 6, para 4.3 to clarify - . In the event that all or part of the payment has not been spent for this purpose within up to 10 years of its receipt, the Council will repay that amount to the developer, with interest. The exact time period for repayment of developer contributions will be negotiated/agreed on a case by case basis as will the level of interest to be repaid, subject to the prevailing financial market and conditions applying at the time.	
		6	In Annexe 7 please use my contact details rather than those of Charles Barlow.	Noted. Correction to text required.	Text Address Updated	Annexe 7 contact details updated

29	Phillip Woodhams	1	The 3rd bullet point in para 3.18 should be removed. The implied requirement as drafted is that any land brought forward for rural exceptions purposes should be made available at nil land value. There is no indication in government advice that this should be a pre condition of the provision of AH. Such a requirement is likely to be counterproductive in obtaining a supply of land for AH in rural areas.	Noted: Text will be amended and clarified. Intention was that landowners should not expect full residential land value i.e. major profit through land sale for affordable housing as this would make proposals unviable. The planning system and need for affordable housing should not subsidise land values/profits. Land value should reflect its existing agricultural use and value (or similar) as there would not normally be any potential for housing development except as a result of exceptional social/affordable need. Effectively the proposal must be seen as viable and achievable without the necessity of Housing Corp Grant, which in percentage terms would effectively be the element of profit on a normal housing site for <u>Unrestricted Speculative General Purpose</u> housing.	Amended para 3.18, (now 3.19) 3rd bullet point - the land cost should reflect its existing use, e.g. such as agricultural value not open market housing value, as without the identification of need and policy exemption planning consent would not normally be forthcoming, thereby avoiding any expectation of using the affordable housing route as a method of achieving greatly increased land values, impacting on proposal viability, and	13/11/2007
		2	PPS3 seeks to dimension the amount of AH that is needed. In price structure, all that is required is that at the time of occupation the pricing structure is pegged, in perpetuity, at affordable levels. Dependent on the variables of construction costs and rental levels this may result in a positive residual value for land. It is submitted that to have a policy which denies that possibility will materially reduce the probability of AH land being made available in rural areas.	Noted: Please see comment above.	See Amendment above	
		3	Given that the amount of AH that is needed at such high levels, it would be imprudent to constrain unnecessarily the potential supply of rural AH.	Noted: Please see comment above.	See Amendment above	
30	M E Sanders	1	No Comment	No Comment	None	14/11/2007
31	W A Sanders	1	No Comment	No Comment	None	14/11/2007
32	Kathlyne Gregson - AWM	1	Links with the West Midlands Economic Strategy include * improved and new housing must meet the needs of the region by providing greater choice, quality and flexibility	Noted: No Change.	None	14/11/2007
		2	needs for high quality design and encourage innovative construction practise	Noted: No Change.	None	
		3	need to create a better balance of housing and employment in our larger settlements	Noted: No Change.	None	
		4	need to promote low carbon development	Noted: No Change.	None	
		5	need to use the West Midlands Sustainability checklist as a tool to assess the SPD	Noted: No Change.	None	
		6	Agency encourages/supports use of "Building for Life" Standards to promote equality of housing choice.	Noted: No Change.	None	
33	Tetlow King Planning	1	We consider that reference should be made to the Planning Policies within the introduction rather than separately in Annex1.	Noted: Planning Policies are to be retained in the Annexes to help maintain brevity and clarity to the document, reference to and relevant extracts from the planning Policies are still included in the main body of the SPD. There is no necessity to repeat existing Policy Documents		14/11/2007
		2	We support the Councils intention to seek 40% AH and to only accept a lower % when it can be demonstrated that the full provision would render the development inviable. We support the reference to the need for AH on all developments	Noted: Point reflects existing adopted Local plan Policy. No Change.	None	

3	We welcome the Council's intention to allow only AH in smaller settlements and that development in these locations should be small and reflect the need, size and character of the settlement and in all cases no more than 10 units	Noted; Point reflects existing adopted Local Plan Policy. No Change.	None	
4	We welcome the provision of the Housing Needs Waiting List - However this data must be viewed in addition to an up to date Housing Market Assessment.	Noted and agreed. Text addition/clarification needed to show how the various data sources will be utilised and applied.		
5	We welcome the design guidance - but are concerned that "pepper potting" the AH as opposed to grouping it in small clusters can lead to management problems in some circumstances.	Noted: Pepperpotting reflects National Guidance in PPS3 "The need to develop mixed, sustainable communities" and companion document "Better by Design". This can simply mean clusters within larger estates/strategic sites and does not preclude smaller single tenure type groups within larger developments or as stand alone sites. Nevertheless the ideal should be to mix the communities across the board (avoiding mono-tenure estates) and simply tagging all "affordable housing" as automatically generating social problems and management difficulties could be seen as discriminatory and over generalised. Some clarification to text can be provided. Unclear as to exactly what these management problems are apart from the overall financial cost through economies of scale and location?	Amend/Clarify para 3.7 - 'pepperpotted' throughout the estate development, where appropriate, rather than concentrated in a single location. This can be via individual units or cluster groups throughout an estate.	
6	We support preference for the provision of AH on site and only in exceptional circumstances to accept off site or financial contributions in lieu	Noted. Supported as reflects adopted Local Plan Policy	None	
7	We advocate the provision of AH in perpetuity on rural exception sites only.	Noted. Disagree. The Council seeks perpetuity on all sites, regardless of location but understand this may not always be achievable in urban locations due to Housing Legislation on Right to Buy and/or Acquire.	Amend/Clarify para 3.25 (now 3.27) - The issue of "Perpetuity" is problematic for the Local authority due to differences between Local Plan Policy and some areas of Housing legislation. Nevertheless the Council will expect all affordable housing to be controlled and retained as affordable in future use/sales through either Planning Conditions or Legal Section 106 Planning Agreements/Obligations. The supporting text to Core Policy 8 is nevertheless clear in that all Affordable Housing, provided via planning applications through the application of the Local Plan Policy, is expected to be maintained as such "in perpetuity" throughout the Borough regardless of location or settlement status.	
8	There should be reference to the S106 advice contained in Annex 6, a model S106 agreement would be helpful. Updated info on AH needs to be derived from HMA.	Noted; Model S106 statement not available but may be something to consider for future. However there is a need to maintain flexibility in drafting and approach.	Annexe 6 reference already noted in para's 3.8 & 3.33 (now 3.11 & 3.35) Additional reference added in para 3.11 - Annexe 6 dealing with standard clauses for S106 legal agreements give greater detail and information on both occupancy and eligibility criteria.	

9	<p>Updating/clarification needed of overall targets and site specific targets. A clear procedure for negotiation with developers for AH/clarification of roles of housing and LPA.</p>	<p>Noted: Support text addition clarification on roles of Housing authority and Planning authority in North Warks. Although there is no guarantee a clear procedure and protocol for negotiation will be adhered to be developers.</p>	<p>Additional Para 3.14 - The role of the RSL is primarily to deliver and manage affordable housing but also in the acquisition, transfer and management of affordable housing delivered through planning applications. The RSL should preferably be either a partner or at least involved at the design and negotiation stage of a proposal, prior to application stage, to ensure any affordable housing delivered complies with their own standards. The Local Planning authorities role is to establish Planning Policy for the delivery of affordable housing and, at the preliminary enquiry or application stage to determine the proposal in accordance with the Plan Policy and, where necessary, negotiate the level and type of affordable housing, in accordance with other strategies such as the Housing Strategy.</p>	
10	<p>Clarification of resourcing and funding issues. Clarification of interface between affordable and special needs housing. Details of calculation of commuted sums for off site provision.</p>	<p>Noted : Adopted Plan Policy is clear in requiring a 10% special needs element of overall housing proposed but only on sites of 25units/1 ha in size. This 10% can be partly or wholly absorbed within the 40% requirement for aff hsg. SPD and Local Plan states this unequivocally. Difficult to provide specific details for calculation of committed sums as these will differ between proposals, sites and settlements and change over time and needs that arise.</p>	<p>No Change - Plan policy does not provide for off-site contribution. This is treated as an exception to the Plan Policy on a case by case basis, but minimum expected must be that sufficient to provide off-site aff hsg (including alternative site provision if not available) at level that would have been provided on-site by policy application.</p>	
11	<p>Pro forma Section 106 Agreements clauses. Space and design specifications, car parking standards. Info required from developers regarding particular site development costs.</p>	<p>Noted. Considered unnecessary detail and duplication. Many of these issues, guidance and standards are included in other guidance documents/SPG's and the Adopted Local Plan. Housing Corp now provide detailed spreadsheet for calculating expected development costs, and also any potential need for Grant subsidy, referred to in the SPD. This document can form the basis of info required for developer costs assessments.</p>	<p>Clarify and nAmend text para 3.21a (now 3.23) - The Housing Corporation have developed an "Economic Appraisal Tool" to assist negotiation of S106 planning obligations and potential need for grant, which is available to use and download on the Housing Corp website. The Economic Appraisal Tool details the type of information expected from a developer in assessing the viability of a site proposal. Use of this Economic Appraisal Tool at an early stage in the planning process will assist housing developers to predict the viability of proposed levels of affordable housing and assist the Council in agreeing planning obligations. The tool is too lengthy and detailed to include in this SPD but is available to view at ; http://www.housingcorp.gov.uk/server/show/ConWebDoc.8681 .</p>	
12	<p>Determination of site suitability. Interface with the housing strategy, community strategy and local strategic partnerships. Supported housing/special needs schemes. Need to be addressed</p>	<p>Noted: SPD aims to give guidance and clarity on the Adopted Local Plan Policy for Affordable Housing not directly address the design issues, site evaluation, wider funding issues, interface with other emerging strategies. Some points of detail and design expectations are covered in the Annexes for regular update but do not impact directly on the AH Policy and SPD. These details are more appropriate for other Design SPD's or for consideration through the LDF process in developing new policies in the Core Strategy. These issues will be brought forward for consideration through the LDF process. No Change to this SPD proposed.</p>	<p>No change</p>	

		13	Clarification of parameters for rural exceptions schemes including parish housing needs surveys, roles of parish councils and RSL's.	Difficult to clarify parameters of what is by definition "an exception" to the Plan and not expected to be given formal, direct guidance via the SPD, which relates to the Adopted Policy . Will be dealt with on a case by case basis. Will clarify text to note that such schemes should clearly be justified and supported by parish housing needs surveys or an alternative, similarly robust evidence base, including assessment of alternative site availability.	Clarify /Amend para 3.18 (now para 3.19) - In addition to the above, in other settlements with a Development Boundary, classed as Category 4 settlements in the Local Plan (see Figure 1 above and Local Plan Appendix 2, Policy HSG2) The main issues are that; - need has to be identified through an appropriate method, normally through a Parish/Ward Housing Needs Survey undertaken by the relevant Parish Council(s) in partnership with the Warwickshire Rural Community Council Housing Enabler, or an alternative, similarly robust evidence base, including assessment of alternative site availability,	
34	Warwickshire Wildlife Trust	1	No Comment	Noted	None	14/11/2007
35	Polesworth Society	1	Strongly agree that AH should be inperpetuity and for local people.	Noted and supported where able to legally maintain and require under present housing legislation.	No change required	14/11/2007
		2	Polesworth needs updated housing needs survey asap.	Noted and Agreed. Council encourages, supports and part funds Parish Surveys, enabled through WRCC.	No change required	
		3	Section 1 - para 1.2 text should be amended to cover all potential sites over and above those identified in Annex 1.	No data available to identify all potential sites . Annex reflects sites in Adopted Plan Policy	None	
		4	Para 1.8 - 2nd line "affect" should be "effect".	Noted and agreed.	As amended	
		5	Section 2 - Background Support update of Housing Needs Survey.	Noted. HMA under production will include an assessment of Affordable Housing Need	No change required	
		6	Para 2.5 - only mentions CV9 postcode - omits other borough postcodes B46-76, part77, 78,79 - text needs modifying	Noted. Will amend text to delete CV9 reference and reflect Borough average housing price.	No change done as data solely within North Works postcode areas unavailable. Will update when figures available. CV9 used purely as an example of the problem.	
		7	Para 3.5 - the ceiling on units within small settlements, ie no more than 10 is unduly restrictive and contrary to Govt Policies on flexibility - reword text"settlements should be small in nature, reflecting the need,size and character of the settlement and in all cases should preferably be less than 10 units.	Noted but disagree as threshold details reflect the Adopted Local plan Policy which the SPD cannot amend. Issue can inform Core Strategy development.	No change	
		8	Para 3.5 Fig 1 - LThe Lynch can now be deleted from this table - is now completed - Fosters Yard should be added to list of Polesworth sites	Noted but disagree as site is still part of and reflected in Policy. Will include text note to indicate site now completed.	Annexe 1 - Policy HSG1 table updated	
		9	Para 3.6 - include reference to "conversion of buildings for residential use could make a valuable contribution to the overall numbers of single bedroom units, thus assisting in meetinglocal needs for AH, "to ensure the charcater of the area is preserved or enhanced.	Noted: Will include text eference to clarify that conversions can make a valuable contribution to AH, but exclude reference to "single bed units" as conversions could be flexible and provide for variety of units in size and bedspaces.	Additional text in para 3.6 - In both rural and urban settlements conversions as well as new build can also make a valuable contribution to affordable housing	

		10	The following statements are not compatible/sustainable "Affordable homes should be at least as large as market homes on the site with the same number of bedrooms" and "Minimum floor space requirements noted for RSL properties, identified in Annexe 3, should apply to AH in all circumstances, regardless of method of delivery and management.	Noted: Disagree. AH provision should be similar in size and scale to similar as open market housing on a site, where a need for that housing of that type has been identified/evidenced. There is a wide AH need ranging from 1 bed flats to 4 bed houses. Why should a 2 or 3 bed Affordable House on a mixed estate have less facilities, room sizes, quality of fittings and amenity space/services than the open market 2 or 3 bed houses on the same site built by the same developer? We are trying to avoid developing substandard housing for the future and provide everyone with equal opportunities. Why should your living space and housing standard/quality be reduced lower than comparable properties on the same housing site simply because you live in a property designated as affordable and you are in affordable housing need ? No Change recommended.	No change	
		11	Observations indicate that demand for flats/apartments is in decline. This needs to be taken into account in this SPD.	SPD takes into account the type of housing need by house type and tenure. The need will be assessed on a case by case basis and will therefore be able to take account of changes in need and supply.	No change	
		12	Para 3.14 - would this apply to Fosters Yard. SA Comments - wider consultation of interested parties from voluntary sector at an earlier stage of SPD preparation.- address in future docs.	Noted: Without details of Fosters Yard proposal unable to comment. Voluntary sector involvement is an issue for future LDF consultations. The SPD was consulted on widely in accordance with the Council's adopted Statement of Community Involvement. No Change.	No change	
		13	Note PPS3 - para 3.0 comments which refers to "rural exceptions on all windfall site for AH developments" - the environment is an important issue in this context and should have a statement to this effect in the SPD	Noted: Local Plan Policy and SPD do not deal with "exceptions" sites. Other Local Plan Policies deal with Environmental Impact and protection. No change.	No change	
		14	Appendix 4 omits Alvecote SSSI - please include and check for any omissions.	Not Relevant to SPD	None	
		15	Appendix 4 para6 - check L. A. reference. Should Staffs CC be Leic CC.	Not Relevant to SPD	None	
		16	The SPD should not have any development boundaries which exclude certain areas. This is restrictive and could be challenged by developers - could be resolved via environmental policies.	SPD does not deal with the issue of Development Boundaries , see other Local plan Policies. No change	None	
		17	Para 6 - WMRSS is under review - consideration will need to be given to this review in amending the SPD	SPD relates to existing Adopted Local Plan Policy not emerging RSS . This is an issue for LDF Core Strategy consideration. No Change.	None	
36	Bromford Housing Group	1	Concern that the housing needs detailed in the SPD are relying on the 2003 Housing Needs Survey - 4/5 years old - may not be reflecting the wider needs and gives potential bias towards those on Council waiting lists - as these will be the groups that respond to such surveys	Noted. Disagree. Need also evidenced by individual Parish Housing Needs Surveys and the emerging HMA (2007), which indicates and reinforces continued Borough wide need. Parish Surveys and 2003/4 Housing Need Survey involved wide consultation of <u>all sectors of community</u>, not simply those people on Housing register	No change	15/11/2007

2	<p>Respecting PPS3 the SPD must reflect all the communities needs. Take into account groups excluded from the market who are important to the wider community but have a low priority/weighting to access AH and may not appear on Councils waiting list. Such groups will require subsidy in order to resolve their housing needs - but not necessary the full extent envisaged within the SPD and not always in the form of SHG. Not clear from definitions within SPD where these groups are catered for</p>	<p>Noted. The SPD , HMA and Housing Needs Surveys do reflect all community needs. Surveys and consultations were/are not targeted at/tailored only to specific sectors of society and community. The types and tenures of Affordable Housing are therefore accessible to wide sector of community, main justification being that they are in an <u>Affordable Housing</u> Need.</p>	<p>No change</p>	
3	<p>By using evidence, collaborating with other bodies and the Regional Assembly the Council will be better positioned to determine all needs and therefore the SPD will be robust, have a long shelf life and accords with adopted policy.</p>	<p>Understood. But the purpose of this SPD is to provide guidance on implementation of the <u>existing</u> Adopted Local Plan Policy, not future Policy changes, which will be a matter for the LDF process and emerging Core Strategy.</p>	<p>No change</p>	
4	<p>Para 2.8 refers to issues of perpetuity. Policy HSG2 states perpetuity is required for schemes in other settlements within a Development Boundary but not in Main Towns, Green Belt MT or Local Service Centres LSC).</p>	<p>Noted: Perpetuity is not exclusive to "other settlements" but applies Borough Wide. Need to make clear cross reference to Core Policy 8 and reasoned justification (see Local Plan para 2.35) which clarifies perpetuity issue. Where Housing Acts do not make provision for retaining Housing as Affordable (Right to Acquire in Urban locations) the SPD seeks to confirm the Planning S106 agreements will be used to maintain perpetuity. Text clarification required.</p>	<p>See additional text clarification in para 3.25 (now para 3.27) - The supporting text to Core Policy 8 is nevertheless clear in that all Affordable Housing, provided via planning applications through the application of the Local Plan Policy, is expected to be maintained as such "in perpetuity" throughout the Borough regardless of location or settlement status.</p>	
5	<p>PPS3 seeks to allow staircasing on shared ownership schemes but recognises the difference between rural and urban areas. SPD is confusing as at 2.8 it implies perpetuity is required and indeed 3.25 states it applies to all AH. Para 3.26 - 3.29 elaborates further specifically for rural schemes whilst 3.30 deals with urban. Clarity required earlier or 2.8 needs to be cross referenced with 3.25 to 3.30</p>	<p>Noted: see response to point 4 above. PPS3 issue is noted but the "local circumstances" evidenced and established by the Housing Needs Survey and at the Public Inquiry enables the Adopted Local plan Policy to outweigh the National Policy guidance in this case.</p>	<p>See amendment above.</p>	
6	<p>Confusion from 2.8 regarding the cost of discounted private rented housing which implies it should be comparable with "similar RSL provided housing" and implicitly at "comparable rental costs of RSL properties". Such rented housing in accordance with PPS3 should be at rental levels above those of social rented but below private.</p>	<p>Noted: See Response above and reference to the Adopted Local plan Policy. No change can be made to adopted Policy, the text reflects the Adopted Policy. This is an issue for consideration through the LDF Core Strategy work.</p>	<p>No change</p>	

7	<p>Para 3.4 - expand to include where sites are artificially sub divided through ownership etc to allow for comprehensive plan to be requested</p>	<p>Noted. Agreed amend text to reflect.</p>	<p>See amendment to para 3.4 - Where a housing proposal artificially minimizes the number of dwellings or the site area, through inappropriately reducing densities or subdividing sites into smaller areas below thresholds, to circumvent Core Policy 8 & Policy HSG2, planning permission may be refused on the basis that no provision is made for affordable housing. Similarly, where it is clear that the site could form part of a larger above threshold site, by including adjoining land not necessarily within the same ownership, but if combined would have clear potential for development, then affordable housing may be sought/justified on the basis of ensuring adequate community infrastructure and services are provided as part of a comprehensive, integrated development.</p>	
8	<p>Para 3.6 implies range of house types to reflect local needs should be provided on all sites though site suitability/sustainability to be taken into consideration. Not all sites will be physically suitable - wheelchairs, local facilities to make them sustainable for social rent</p>	<p>Noted: Will clarify text. Intention is to seek/supply AH that reflects the need. So if need is primarily family housing then that is what will be sought. However, this is clearly subject to the type of development proposed and in flat developments, for instance, it is likely that the provision will not include/insist on family type housing. Needs identified at present cover a wider range of household types so problems unlikely to occur. Site</p>	<p>Amend para 3.6 sentence 1 at end - houses should reflect the local need, unless physical or locational site constraints preclude this from being applied, such as in town centre building conversions.</p>	
9	<p>Para 3.7 - pepper potting on an individual house basis is not desirable - potentially creating tensions between different tenures doing little to contribute to sustainable communities. Pepper potting within flatted schemes does not work for social rented units although in both cases shared ownership can be more successful with open market housing. Avoiding large concentration of AH on larger developments is supported, preference is for small groupings, not pepper potting. Social rented flats should be grouped with their own self contained access and separate amenities.</p>	<p>Noted: Disagree. The nature and level of "pepperpotting" can be negotiated but it should still be required to avoid "ghetto-ising" Affordable Housing, so could be in small groups rather than wholly individual property placements. Should avoid making artificial "social and economic" boundaries or exclusion areas through siting of property. Encourage social mix and tenure mix. No Change.</p>	<p>Amend/Clarify para 3.7 - 'pepperpotted' throughout the estate development, where appropriate, rather than concentrated in a single location. This can be via individual units or cluster groups throughout an estate.</p>	
10	<p>Para 3.8 implies where there is no RSL or no SHG then different standards could apply - is this what is meant? If not clarify</p>	<p>Noted: Will clarify text to note the RSL's require Housing to meet standards set out in Housing Quality Indicators(HQI's) derived from Housing Corp's design standards. This level of standard will be expected in all cases where RSL involved, including where housing is to be transferred to an RSL. Only where no RSL involvement is expected or likely will there be any negotiation on relaxation or reduction of such standards. Private Sector only development will still be encouraged to be delivered to similar</p>	<p>Amended text para 3.8 - Homes that are to be transferred to the ownership of RSLs and/or part funded by Housing Corp Grants will need to satisfy any specific requirements for that form of affordable housing. This will normally require the housing to comply with the 'Code for Sustainable Homes' (Eco-Housing) minimum level 3 and/or similar BREEAM standards, "Lifetime Homes" standards and/or CABE 'Building For Life' criteria at</p>	
11	<p>Para 3.9 - SPD should clarify what timescale the Council will work to in seeking to agree an AH scheme</p>	<p>Noted: Difficult to set rigid timescales as depends on many issues/inputs. No Change recommended.</p>	<p>No Change</p>	
12	<p>Para 3.10 - clarify what nominations provisions the Council would seek in respect of immediate tenures.</p>	<p>Noted: Agreed, will clarify text to include note on Councils Housing strategy and agreed/expected nomination rights for AH.</p>	<p>Amend 1st and last sentence para 3.10 - Affordable housing should always be offered in accordance with the Council's nominations policy, detailed in the Councils Allocation Policy, The Councils Allocation Policy will also apply to intermediate, shared ownership housing, where those on the Register and in identified housing need have indicated a preference for purchase over rental.</p>	

	13	Para 3.12 & 3.15 = see point 1,2 and 3 above	Noted: See response to points 1, 2 & 3 above	No change	
	14	Para 3.16 - considered unworkable within context of the HC rules regarding shared ownership which use open market values as the driver with equity purchased determining the monthly rent. RSLs have limited ability to control or artificially suppress the monthly outgoings and certainly not at equivalent social rents. Applying such restrictive parameters on a blanket basis is considered to be running against government initiatives to cater for such a range of income groups. Restrictions may prevent sites coming forward, particularly in rural areas. SPD is nullifying the benefit intermediate housing solutions can offer in meeting wider community needs and allowing truly mixed tenure schemes to be realised. Measures are specific to intermediate forms of tenure- alternative would be able to define affordability with specific reference to local income levels.	Noted: Issue of shared ownership monthly costs/outgoings is a difficult one. Nevertheless the Adopted Plan Policy requires that shared ownership properties must be accessible at level of outgoings comparable to RSL rental for a similar property, otherwise such tenure is, quite frankly, still unaffordable within North Warwickshire Borough area. User of lower initial %tage share purchase (eg 25%) could help as well as flexible longer term mortgages. The Policy does not prevent such properties being purchased/paid for at a higher than RSL rental by people in affordable housing need it just requires that the properties must be accessible at a level comparable to RSL rentals to ensure the property and tenure is truly affordable and accessible to as broad a number of people in Affordable need as possible. Only being able to access such properties and tenures at a monthly cost far greater than RSL rentals effectively reduces drastically the number of people in AH need that can access and afford such properties. The Policy seeks to serve a far wider AH need not simply a small sector that can afford to pay far more monthly than the average local wage can accommodate. No Change to SPD can	No change	
	15	Para 3.17 - consider adding "where applicable.	Noted: Agreed, add text.	Amended para 3.17 (now 3.18)	
	16	Para 3.24 = see 10 above	Noted: Agreed, see response to 10, clarify text.	see response to point 10 -para 3.8	
	17	Para 3.28 there is no standard HC lease - been replaced with sample document plus a checklist of key criteria in the HC's Capital Funding Guide which is incorporated in all shared ownership leases	Noted : Agreed, correct and clarify text	Amend para 3.28 (now 3.30) - to include such staircasing restrictions within the shared ownership lease agreement in accordance with Housing Corporation guidance on Lease agreements and arrangements for all intermediate housing (shared ownership) and rentals, whether they be provided directly by the RSL or transferred to them from a private developer.	
	18	Para 3.34- Mortgage protection is basic requirement needed in all shared ownership lease documents - without it purchaser unable to get mortgage. SPD needs to be clear in this context and not seek to restrict innovative models to provide AH	Noted: Will need to get legal clarification and amend text where necessary. Concern is over potential loss of perpetuity of AH to open market due to default on payments. Property should only be offered subsequently to those in AH need unless need no longer exists, not automatically placed on open market. So called "Innovative" model appears to be a loophole or charter for mortgage companies to force sale on open market regardless of planning restriction. Clause could be amended to require sale only to RSL so as to retain property within AH market yet provide them with their immediate cash return.	Minor change to para 3.34 (now 3.36) -	
	19	Para 3.35 - Considered not unreasonable for SPD to state maximum period within which the Council should produce S106 especially as without it no development can take place with the context of 3.9 above.	Noted :It is difficult to determine precisely the maximum period for S106 production due to varied nature of agreements and proposals. Will shorten text to a statement of fact and clarify to indicate time period between establishing S106 terms and content and the submission and grant of Planning consent needs to be kept as close as possible (notwithstanding any statutory requirements on dealing with applications).	Minor amendment to 3.35 (now 3.37) - The Heads of Terms of any Agreement will need to be established before determination of a planning application preferably prior to submission through negotiation and agreement with the Council.	
	20	Annexures. Generally need to reflect the main body of the SPD and no specific comments can be made here given the issues raised above.	Noted: No change	None	

37	Planning Issues Ltd	1	SPD should specify the tenure mix to be provided in terms of % rented units and % intermediate units. Para 3.12 mentions a priority for affordable rented units, but goes on to say private rented, shared ownership and discount market housing will also be acceptable where needs exist.	Noted: Disagree. National Policy prevents Planning Authorities from rigidly specifying tenure mix.	No change	15/11/2007
		2	Para3.2 contradicts Para 15 which says about 96% of AH should be social rented.	No contradiction. The 2003 Housing needs survey identified that effectively 96% of AH need could only truly be catered for through social rental (due to costs of shared ownership) and 3.8% by shared ownership methods. The 100% referred to in para 3.2 includes both the types of AH tenure, para 3.15 simply notes that of that 100% AH, 96% should be rental. Will clarify text to make this point clearer.	No change	
		3	Para 19 - where it can be robustly justified off site provision on another site or by financial contribution, of broadly equivalent value to that which would have been provided on site should be included as an acceptable alternative (PPS3).	Noted: SPD and Adopted Local Plan Policy does not make provision for "Exceptions" sites as this is an exception to the adopted Policy and will be treated differently. No change recommended.	No change	
		4	Para 25 - AH should remain affordable only whilst there is an identified need, which may not be for ever. Use of the word "perpetuity" is not appropriate.	Noted: Will clarify text to note that perpetuity will be subject to continuing need within Borough. Evidence will, nevertheless, be required of lack of need from both applicant/owner and Local Authority RSL's before AH restrictions are removed.	Added text to end of para 3.32 (now 3.34) - The issue of perpetuity is clearly linked to the continuing need for affordable housing within the Borough. Only where clear, unequivocal evidence that a Borough wide or local need, including in adjoining local authority wards, no longer exists will the removal of any "perpetuity" restrictions on affordable housing be considered.	
		5	Annexe 1 Para 2- The Council should define the type of special needs accommodation which is acceptable instead of AH	Noted: Details of special needs are included in Adopted Local Plan. No need to repeat Plan provisions again. Will cross reference to Plan on this issue but no need for detailed text additions.	No change	
38	Redrow Homes - John Acres	1	The requirement for AH in North Warks is set too high for some sites making them unviable - hence undeliverable	Noted: Cannot change % requirement which has been established in the Adopted Local Plan Policy through consultation, Public Inquiry and viability assessments. SPD is guidance on the implementation of that Local Plan Policy, not seeking to change or amend it, which will be a matter for the LDF process and emerging Core Strategy.	None	15/11/2007
		2	Only way to deliver AH is to deliver lots more housing per se as per Barker recommendations. This will bring down house prices generally, increase amount of lower cost housing, take pressure off affordable need at margins and help provide/deliver additional sites for RSL's	Noted: Disagree on local basis. In isolation North Warwickshire alone could not physically build/permit sufficient houses to have any significant effect on House prices without major impact on countryside, environment, infrastructure and services. SPD cannot impact or effect housing land supply, which will be a matter for the LDF process and emerging Core Strategy. Wider increase in housing supply Regionally would be necessary to have a major impact, sufficient to improve affordability of housing to level needed locally.	None	
		3	Low strategic housing requirement has caused the affordability problems in Borough	Noted. Agreed this has an impact effect, however see comment above.	None	
		4	NWBC must not accept reduced housing requirements through RSS Review. Housing in Borough should be increased	Noted: No change, RSS requirements are not an issue for the SPD.	None	

5	NWBC should ignore existing housing needs survey which is technically flawed and inflates actual need and undertake a HMA before the SPD otherwise the SPD will also be flawed.	Noted: Disagree, Survey underwent wide ranging consultation and examination through the Local plan Inquiry process and has been confirmed/vindicated by findings of recent 2006 HMA.. No Change.	HMA undertaken, which confirms findings in Housing Needs survey. Text added to reflect this in para 2.3 - The Council has also undertaken a Housing Market Assessment (HMA), in partnership with other sub-regional authorities. The HMA has confirmed a continued need for 281 Affordable units pa over the RSS Preferred Option 2006-2026 period.	
6	Public consultations and opinion surveys are misleading and inaccurate estimations of need affected by misleading perceptions	Noted. Affordable Housing Surveys are not simply based on opinions but also have a statistical, numerical base and assessment method. Affordability based on assessment of local income levels and local housing prices and rental levels, housing availability/demand etc and therefore will reflect local circumstances and affordability of housing fairly clearly/explicitly.	No change	
7	As buying house is most significant life purchase, people will often regard prices as being far too high	Noted: Agreed, No Change.	No change	
8	Social renting doesn't provide opportunity to get on home ownership ladder therefore will not affect "affordable" issue.	Noted: Disagree, Rental tenure provides AH that otherwise would be unavailable to those on incomes that are unable to afford shared or outright purchase. Opportunity still remains through Right to	No change	
9	Para 2.8 Draft SPD includes a new definition which excludes low cost housing - this is not same definition used for the adoption of the LP but is more onerous. Redrows "Debut" range of low cost market units should qualify within the intermediate category 10. Section 2 - concerned that onerous overall requirements and 100% requirement for smaller settlements is unlikely to be delivered unless with public subsidy.	SPD simply reflects definition change in PPS3, National Policy guidance. Local plan definition is specific and clear in that "local affordable housing" is tenure blind, but must be affordable by being comparable in monthly cost to RSL Rental. At present RSL rental levels it is effectively financially unviable/impossible to provide a so called "low cost" house that will accord (in terms of its monthly costs) with this definition (given present house build and land costs). Nevertheless, if a developer provides "low cost" housing that can be accessed at that level it could be treated as locally affordable through the local plan policy.	No change	
10	40% of target will be rarely possible to achieve in NW resulting in many allocated sites remaining undeveloped.	Noted; This may be an issue for the LDF process and Core strategy to consider.	No change	
11	Para 3.6 - 3.8 avoid pepperpotting which causes management difficulties. Better to cluster AH in groups across larger sites to form smaller communities.	See Note/Response to Response No.33. - Noted: Pepperpotting reflects National Guidance in PPS3 "The need to develop mixed, sustainable communities" and companion document "Better by Design". This can simply mean clusters within larger estates/strategic sites and does not preclude smaller single tenure type groups within larger developments or as stand alone sites. Nevertheless the ideal should be to mix the communities across the board (avoiding mono-tenure estates) and simply tagging all "affordable housing" as automatically generating social problems and management difficulties could be seen as discriminatory and over generalised. Some clarification to text can be provided.	Amend/Clarify para 3.7 - 'pepperpotted' throughout the estate development, where appropriate, rather than concentrated in a single location. This can be via individual units or cluster groups throughout an estate.	
12	Para 3.15 - no justification for suggesting social rented housing should form majority of AH allocation - it is impractical and undesirable - should be subject to negotiation - expectation should be no more than 50/50 rented/shared ownership.	SPD simply states the Local Plan definition, which is tenure blind. Nevertheless it is noted in the Fordhams Housing Needs Survey that, in terms of real affordability, it is inevitable that the principle form of tenure that will be both achievable, viable and accessible to the level of incomes/sector of the community most in need will be social rental.	No change	

		13	Para 3.18 nil land value pressure on small rural settlements will reduce likelihood of sites ever being released.	Noted : Unfortunately difficulties of achieving viability for sites in present climate of over inflated land values (as opposed to development costs). Land value on such restricted rural sites should reflect likelihood and type of housing potential possible, which should be considerably reduced for AH and never reflect/be comparable to full open market housing land values (unless this can actually be achieved through planning system and Policies). Text can be clarified on this point but expectation of value should remain low. Potential release of sites will, inevitable be small and reflect those truly committed to providing/delivering and supporting the need for AH rather than simply seeking inflated land values and short term returns.	Amended para 3.18, (now 3.19) 3rd bullet point - the land cost should reflect its existing use, e.g. such as agricultural value not open market housing value, as without the identification of need and policy exemption planning consent would not normally be forthcoming, thereby avoiding any expectation of using the affordable housing route as a method of achieving greatly increased land values, impacting on proposal viability, and	
		14	Paras 3.20 and 3.21 - % requirements are set to high, 40% figure is purely arbitrary and should be expressed as a target, not a fixed requirement	Noted: %age thresholds and returns simply reflect Adopted Local plan Policy which is not under review. No change possible. Issue for future LDF and Core Strategy to consider.	No change	
		15	Para 3.20 and 3.21-viability appraisals should not be public as this undermines commercial confidentiality.	Noted: Disagree fundamentally. Planning system is an open, publically accountable system. National guidance is to seek open book accounting for proposals to avoid issues of mis-information, potential fraud and clear identification of costs that effect viability to show they are justified. Much of information classed as Commercially confidential, such as price paid for land, construction costs (RICS available comparisons) etc.. is publically available elsewhere and accessible through Land Registry and websites. So what is there to truly hide from public scrutiny and why? No Change.	None	
		16	There is no fixed AH need - it varies over time and economic circumstances and is affected by demographic changes and mortgage finance. the Council needs to assess Housing market needs and demands beyond NWBC boundaries	Noted. The SPD is guidance on implementation of the <u>existing adopted Local Plan policy</u> . Emerging Policy will be informed by and evidenced by a <u>sub-Regional</u> HMA (presently being produced) and Housing Needs surveys or Reviews both Borough wide and Parish based surveys. Changes in AH need will therefore be reflected in emerging policy work. Need for flexible approach is noted and understood for such Policies.	HMA undertaken, which confirms findings in Housing Needs survey. Text added to reflect this in para 2.3 - The Council has also undertaken a Housing Market Assessment (HMA), in partnership with other sub-regional authorities. The HMA has confirmed a continued need for 281 Affordable units pa over the RSS Preferred Option 2006-2026 period.	
		17	It is illogical to sanction a reduction of the strategic housing requirement through WMRSS review whilst imposing unrealistic affordable requirements on developers.	Point Not Understood. The SPD is guidance on implementation of the existing adopted Local Plan policy. The SPD is not suggesting or recommending a reduction in strategic housing requirement. That is an issue for the RSS review and emerging policy in the Core Strategy of the Local Development Framework. Viability issues are accommodated by the existing adopted Policy.	None	
39	Brian Gudger	1	Loss of public open space.	Noted: Not relevant to SPD. No Change .	None	19/11/2007
		2	Lack of privacy would make area claustrophobic	Noted: Not relevant to SPD. No Change .	None	
		3	Brownfield sites should be considered first, such as old Vero factory on Coleshill Road.	Noted: Not relevant to SPD. No Change .	None	
		4	Lower the value of properties in surrounding area	Noted: Not relevant to SPD. Impact on values often questionable and not classed as a Planning Issue. No Change .	None	
		5	Cause noise and nuisance during construction	Noted: Not relevant to SPD. Covered by other legislation and statutory controls/regulation. No Change .	None	
		6	Car parking would be virtually impossible to accommodate housing in such a small area.	Noted: Not relevant to SPD. Assessed and provided for under other Planning Policy Standards. No Change .	None	
		7	Increased traffic in confined area, increased hazards for children. Noise and light pollution would increase.	Noted: Not relevant to SPD. Assessed and provided for under other Planning Policy Standards and Design requirements. No Change .	None	

40	Curdworth & Wishaw Residents Association - R Pearson	1	Para 2.4(l)emphasis on locality highlighted in respect of people as part of their community. Concerned that no obvious attempt has been made to find local people deserving of allocation. The selection process makes a mockery of the Parish Plan questionnaire which revealed 47 people had to move away to find suitable accommodation. If more houses to be built a third of residents want starter homes, another quarter favoured single/sheltered accommodation	Noted: These are issues for specific AH identification of need and delivery through Parish Needs surveys. Such evidence can then reflect actual types of need and identify opportunities to accommodate that need. However, scale of need and development required to serve it must be sustainable in scale, amount and character with the settlement as required by Adopted Local plan Policy. No Change.	None	
		2	Para 3.11 stated that AH should initially go to those who live/work in the Parish. Not aware any contact has been made with residents,councillors etc to assess local needs.	Noted: Parish Needs Survey should establish this need and identify those in need. They should be encouraged to Register on Housing Needs list also or can be targetted through specific planning applications or proposals. Without this info/evidence the Local Authority must rely on its own info/lists/evidence of need and demand so this should encourage Parish Councils to consider undertaking such detailed surveys to target the AH provision much more locally. No Change recommended.	None	
		3	Draft AH Protocol 2004 showed Site 17 Curdworth among the housing allocations with 40% AH. States on page 15 that "in the first instance AH will be made available to all those who live in the ward, which presumably means the local parishes. Given that site 17 is now called The Paddock and is quoted as "one of the few opportunities for housing development within Curdworth" - its a pity that no youngsters might have an "opportunity" to access the housing ladder	Noted: Unsure as to document referred to and point made? Previous AH protocol will be superceded by SPD and does not accurately reflect Adopted Local plan policy. Curdworth is a Category 4 settlement within which all housing has to be 100% affordable. No provision for open market housing has been made for the settlement. Opportunity therefore exists to service local Affordable housing Need through this specific site, as it can only come forward on that basis. No Change recommended.	No change	
		4	seems to be an over reliance on RSL's. Understood that NWBC does not run an affordable housing register - but those going on the housing waiting list have the opportunity for AH. They may be either unaware of this or consider that going on the list could be perceived as being downgraded socially.	Noted. The Register includes people on both RSL and Council lists, not simply for Council Housing. Council are aware of "social stigma" issue, which is a wider societal prejudice difficult to change/discount. Only through encouraging all people in need to indicate this through the register will both the size of the need be recognised and perhaps the social stigma be reduced as a much wider social/economic mix will be reflected in the make-up of the register.	No change	
		5	For all the good intentions of housing Policy within the Local Plan, the realityof building 5 bed houses in villages still flies in the face of villagers wanting to see future housing which keeps both young and old in the community.	Noted. SPD does not restrict size and type of dwellings to only 5 bed houses. Housing provision and mix must be directly related to type of need identified and evidenced. This will include all sectors of village communities, young, old , with or without special needs.	No change	
41	Corley Parish Council - S Osbourne	1	Majority of the PC would be in favour of AH. Reservations as to chosen sites. No great need been demonstrated yet for AH in Parish	Noted. Recent Housing Needs survey indicated need for 3/5 units	No Change	08/11/2007