

**Stratford-on-Avon District  
Local Development Framework  
Meeting Housing Needs  
Supplementary Planning Document  
Consultation Statement**



JULY 2008

2008

# Meeting Housing Needs Supplementary Planning Document Statement of Consultation

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## **1. Introduction**

- 1.1 The draft Supplementary Planning Document (SPD) entitled 'Managing Housing Supply' was published for public consultation in early October 2007. Comments on the draft SPD were invited during the 6 week consultation period concluding on Thursday 15 November 2007.
- 1.2 The Draft SPD was made available for public inspection at the Council's main and area offices and also at all libraries within the District. A statement of SPD matters was published in the Stratford-upon-Herald and the Stratford, Leamington and Redditch issues of the Observer on Thursday 4 October.
- 1.3 Both the draft SPD and the statement of SPD matters were published on the Council's web site.
- 1.4 Letters were sent to over 1000 consultees on the Council's community consultation database inviting comments on the draft SPD. A full list of consultees is attached as appendix 1.

## **2. Summary of Issues Raised, the Council's Response and how the issues have been addressed in the adopted SPD**

- 2.1 During the consultation period responses were received from 42 separate organisations and individuals. A comprehensive schedule summarising the representations received together with the Council's response is attached to this as Appendix 2. A summary of the key issues raised is provided below.
- 2.2 The most significant and substantive representations have been received from representatives of the development industry. A number of general themes emerged:
  - Concerns that the SPD is seeking to introduce significant changes to planning policy for market and affordable housing which should be dealt with in a Development Plan Document rather than an SPD.
  - Concerns that the SPD is too prescriptive and seeks to place too many restrictions and controls on market housing development, to the extent that it will not achieve or encourage the range of housing required, but is likely to have the reverse effect.
  - Concerns that the document is too lengthy and complex.
  - Concerns that the SPD fails to address the shortage of housing and introduces measures which will frustrate delivery.
  - Some representations suggest that the preparation of the SPD should be delayed or even abandoned and the issues addressed through the Local Development Framework.
- 2.3 Notwithstanding the significant concerns raised by the development industry the draft SPD did receive a number of supportive comments from representatives of local communities and RSLs.
- 2.4 Detailed responses to the representations received are provided in Appendix 2. The Council's Executive considered the representations

received and resolved that the SPD be adopted but with the following key changes:

- (i) That Part 1 – Introduction be edited to reduce its length and make it easier to understand.
- (ii) MHN2 at para 6.3.2 on page 19, sought to give preference to schemes that maximise the proportion of affordable housing. Having considered the representations received it was considered that the means of implementing this preference are at best unclear and it was therefore agreed that it be deleted.
- (iii) MHN3 at para 6.4.2 sought the maximum viable proportion of on-site affordable housing provision from every site. This approach attracted much criticism from developers and landowners and was also not supported by representations from RSLs. In terms of clarity and ease of implementation the RSLs consider that it is better to specify a clear percentage target. This argument was accepted and it was agreed that MHN3 be amended to refer to a specific % requirement.

The Executive considered whether this should increase from the current 35%, but resolved to retain the current requirement in the adopted SPD. Executive indicated that this issue should be reconsidered as part of the Local Development Framework Core Strategy.

- (iv) MHN9 at para 8.3.4 on page 27. Para 2 required the submission of a financial appraisal and residual land value calculation in all cases. Having regard to the changes agreed to MHN3 above, these calculations would only be required for those sites where the developers claim that they are unable to deliver the minimum proportion of affordable housing. MHN9 is therefore amended accordingly. The wording of para 3 (i) is also be amended to clarify that financial contributions relating to monitoring will be limited to the costs of monitoring the specific legal agreement rather than the wider monitoring functions of the Council.
- (v) MHN12 at para 9.2.2 provides guidance on the optimum stock mix for market housing based on the evidence provided by the Joint Housing Assessment. Once again this attracted substantial objection from developers and landowners on the basis that it is too prescriptive, especially the proposal that the provision of studio or one-bedroom dwellings is not acceptable. Whilst some of the criticisms of MHN12 were accepted the general principle of providing guidance on stock mix based on up to date evidence remains valid. The following amendments were agreed:

- Para 1(a) that the blanket ban on studio/one bedroom dwellings be deleted.
- Para 1(b) amend to specify that at least 75% should be in the form of 2 or 3 bedroom dwellings.

The Executive had regard to the Council's Corporate Strategy which has made it a priority to increase the proportion of 2 and 3 bedroom properties on new developments.

- (vi) MHN13 at para 9.3.2 on page 33 – attracted much criticism in seeking to impose certain standards relating to 'Lifetime Homes' and minimum garden sizes. It was agreed that the wording of MHN 13

should be amended to 'encourage' rather than 'require' such provision.

2.5 In addition to the changes agreed in response to the representations received some substantive changes were agreed having considered internal comments received from the Council's Housing Team. These are set out below:

(i) In the interests of clarity and consistency with the Council's Local Choice SPD it was agreed that MHN1 part (2) be amended to read '*The occupancy of all affordable and local market housing...*'

(ii) Section 5.3 deals with Local Housing Needs Surveys and needs to be updated to reflect the fact that it may be appropriate in limited circumstances for a developer to initiate a local housing needs survey. For these reasons the inclusion of the following paragraph after para 5.3.2 was agreed:

*'There is an expectation that rural housing schemes will be brought forward through the Parish Plans process, including associated local housing needs surveys. In limited circumstances it may be appropriate for prospective developers to initiate local housing needs surveys. This will only be appropriate in situations where either:*

- *An adopted Parish Plan (or equivalent) is not in place and there is no firm commitment on the part of the local community concerned to prepare such a plan within a reasonable timescale.*

*Or*

- *A Parish Plan (or equivalent) has been adopted, but has not been reviewed within 5 years since the date of adoption and where there is no firm commitment from the local community to undertake such a review within a reasonable timescale.*

*Nevertheless in order for such surveys to have credibility and carry weight it is essential that the local community should be consulted on the justification and methodology used for the survey, and on a draft of the survey questionnaire.'*

(iii) MHN6 at para 6.4.13 deals with the use of compulsory purchase powers to deliver housing. It is recognised that this should also include the infrastructure that is required to support the delivery of housing. As such it was agreed that the first sentence of MHN6 be amended to read: '*... the delivery of new housing and associated infrastructure in accordance with...*'

2.6 Having regard to the changes agreed above, and the time which has elapsed since the publication of the original draft SPD, there are a number of factual and editorial changes which were required.

**List of Organisations & Individuals Contacted  
During Consultation Exercise**

6024 Preservation Society Limited	Bishopton Avenue Residents' Association
Abbots Morton Parish Council	Bishopton Residents Action Group
ACRE (Policy)	Blockley Parish Council
Action for New Educational Resources for Alcester	Boddington Parish Council
Admington Parish Council	Brailes Parish Council
Advantage Alcester	Bridgetown Residents Association
Advantage West Midlands	Bridgman Services Ltd
Age Concern Warwickshire	British Horse Society
Alan J. Morrison	British Trust for Conservation Volunteers (Warks) (BTCV)
Alcester & District Local History Society	British Waterways (West Midlands)
Alcester Business Network	British Waterways South East
Alcester Chamber of Trade and Commerce	Brockhall Village Limited
Alcester Civic Society	Bromford Housing Group
Alcester Estates Ltd.	Bromsgrove District Council
Alcester Opportunities	BT Group Plc
Alcester SCAN	Bude Canal Trust
Alcester Town Council	Burmington Parish Meeting
Alderminster Parish Council	Burton Dassett Parish Council
Alveston & Tiddington Allotments & Gardens Assoc.	Business Link
Alveston Villagers' Association	Butlers Marston Parish Council
Ancient Monuments Society	Byfield Parish Council
Arrow Parish Council	C.J. & J.D. Cole
Arts Council West Midlands	Camping & Caravanning Club
Aston Cantlow Action Group	Catesby Parish Council
Aston Cantlow Parish Council	Central Networks
Atherstone-on-Stour Parish Meeting	Centre for International Transport Studies
Avon Dassett Parish Council	Chadshunt Parish Meeting
Bancroft Cruisers	Chapel Ascote Parish Meeting
Barcheston & Willington Parish Meeting	Charlecote Parish Meeting
Barge Association	Charwelton Parish Council
Barton-on-the-Heath Parish Council	Chastleton Parish Council
Batsford Parish Council	Cherington & Stourton Joint Parish Council
Bearley Parish Council	Cherwell District Council
Beaudesert & Henley-in-Arden Joint Parish Council	Chesterton & Kingston Parish Meeting
Beoley Parish Council	Church Lench Parish Council
Bickmarsh Parish Meeting	Claverdon Parish Council
Bidford Appraisal Group	Cleeve Prior Parish Council
Bidford Sports & Community Initiative	Clifford Chambers Parish Council
Bidford-on-Avon Health Centre	Clopton Conservation Committee
Bidford-on-Avon Parish Council	Colin Powton
Bidford-on-Avon Residents Group	Color Estates Ltd
Billesley Parish Meeting	Combrook Parish Council
Binton Parish Council	Commission for Architecture and the Built Environment (CABE)
Birmingham Road Action Group	Commission for Rural Communities
Bishops Itchington Parish Council	Company of the Proprietors of Stroudwater Navigation

**List of Organisations & Individuals Contacted  
During Consultation Exercise**

Compton Scorpion Estate	Environment Agency - Thames Region, West Area
Compton Verney Parish Meeting	Ettington Parish Council
Compton Wynyates Parish Meeting	Evenlode Parish Council
Cornwell Parish Meeting	Exhall Parish Council
Cotswold District Council	Farming and Wildlife Advisory Group (FWAG)
Cotswold Line Promotion Group	Farnborough Parish Council
Cotswolds Conservation Board	Fenny Compton Parish Council
Coughton Parish Council	FFT Planning (Friends Families and Travellers)
Council for British Archaeology (HQ)	Forestry Commission
Council for British Archaeology (West Midlands)	Freight on Rail
Council for Voluntary Service	Freight Transport Association – W. Mids
Councillor Jill Dill-Russell	Friends of the Earth - Stratford-upon- Avon
Councillor David Booth	Fulbrook Parish Meeting
Councillor Helen McCarthy	G. J. Botts
Councillor Nina Knapman	G.P. & C.M. Sampson
Councillor Richard Hyde	Gallagher Estates
Country Land and Business Association (CLBA)	Garden History Society
Countryside Alliance	Gaydon Parish Council
Coventry & Warwickshire Friend	Geoffrey Prince Associates Ltd
Coventry and Warwickshire Learning and Skills Council	George Wimpey South Midlands Ltd
CPRE (South Warwickshire)	Georgian Group
CPRE Redditch Group	Gloucestershire County Council
CPRE Warwickshire Branch	Gloucestershire Housing Association
CTC	Government Office for the West Midlands (GOWM)
Culture West Midlands	Great Alne Parish Council
Cushman & Wakefield	Great Wolford Parish Council
Cyclists' Touring Club - HQ	Greenpeace
D E Harman	Greenway Association
Daventry District Council	Groundwork UK
David Wilson Homes	Gypsy Council
Defence Estates	H.G. Hodges & Sons Ltd.
Defence Estates	Halford Parish Council
Derbyshire Gypsy Liaison Group	Hallam Land Management Limited
Development and Enabling Officer, Housing, SDC	Hampton Lucy Parish Council
DFT Rail	Harbury Parish Council
Disability Living Foundation	Harbury Society
Disability Rights Commission	Harvington Parish Council
Dorsington Parish Council	Haselor Parish Council
DSM Demolition Limited	Health & Safety Executive
Earlswood & Forshaw Heath Residents' Association	Heart of England Tourist Board (HETB)
East Midlands Regional Assembly	Heart of England Way Association
Ebrington Parish Council	Hellidon Parish Council
English Golf Union - Golf Services	Help the Aged
English Heritage (West Midlands Region)	Henley SC.AN
Environment Agency	Henley-in-Arden Society

**List of Organisations & Individuals Contacted  
During Consultation Exercise**

Highways Agency	M. Terry
Historic Narrow Boat Owners Club	Malvern Hills District Council
Hockley Heath Parish Council	Mappleborough Green Parish Council
Hodnell & Wills Pastures Parish Meeting	Michael R. Wright
Home Builders Federation	Mickleton Parish Council
Honington Parish Meeting	Midlands Architecture and the Designed Environment
Housing Corporation (West Midlands)	Midlands Architecture and the Designed Environment (MADE)
Howkins and Harrison	Miller Strategic Land
Idlicote Parish Meeting	Minitram Systems Ltd
ILEAP	Moreton in Marsh Town Council
Ilmington Parish Council	Moreton Morrell Parish Council
Ilmington Village Plan Working Group	Morton Bagot, Oldberrow & Sperrall Parish Council
Inkberrow Parish Council	MP for Mid-Worcestershire
Inland Waterways Amenity Advisory Council	Mr A. T. Alsop
Inland Waterways Association - Warks Branch	Mr Brian Moore
Inland Waterways Association (HQ)	Mr C Hodges
James Plaskitt, MP	Mr C Swan
Jephson Housing Association Group	Mr G & Mrs G Lines
Joan Hurley Discretionary Settlement	Mr Neil Hobday
John Baylis	Mr. & Mrs. Purser
John Bradley	Mr. & Mrs. Turner
John Maples MP	Mrs A R Finding
JS Bloor (Services) Ltd.	Mrs Doyle
K. Willis	Mrs Halina Poloczek
Kineton Parish Council	Mrs J.D & Mr T. Clarke
Kinwarton Parish Council	Mrs. Hillis
Knight Frank	Museums, Libraries and Archives West Midlands
Ladbroke Parish Council	Napton-on-the-Hill Parish Council
Lakes Partnership	National Farmers Union
Langley Parish Council	National Federation of Young Farmers' Clubs
Laura Mazzoli	National Grid
Level Ltd	National House Building Council
Lighthorne Heath Parish Council	National Housing Federation
Lighthorne Parish Council	National Playing Fields Association (NPFA)
Lighthorne Society	National Trust
Little Compton Parish Council	Natural England
Little Wolford Parish Meeting	Network Rail
Local Agenda 21 Forum	Network Rail Infrastructure Ltd
Long Compton Parish Council	New Facilities for Alcester High School Technology College
Long Itchington Parish Council	Newbold Pacey & Ashorne Parish Council
Long Marston Appraisal Flood Team	North and Middle Littleton Parish Council
Long Marston Parish Council (Marston Sicca)	Northamptonshire County Council
Loxley Parish Council	npower
Luddington Action Committee	
Luddington Parish Council	
M Paddock	

**List of Organisations & Individuals Contacted  
During Consultation Exercise**

Old Stratford & Drayton Parish Council	Royal Agricultural Society of England
Open Spaces Society	Royal National Institute for Deaf People
Orange Personal Communication Services Ltd	Royal National Institute for the Blind
Orbit Housing Association	Royal Society for the Protection of Birds (RSPB)
Oversley Green Residents' Association	Rugby Borough Council - Planning Policy Team
Oxfordshire County Council	Rural Forum for Coventry, Solihull & Warwickshire
Oxhill Parish Council	Rural Housing Enabler for Warwickshire
P Tawver	Rural Housing Trust - HQ
Pathfinder Tours	Salford Parish Council
Pebworth Parish Council	Salford Priors Parish Council
Peter J. & Jane M. Beeley	Salford Priors Residents' Action Group (SPRAG)
Pettifer Group Ltd.	Sambourne Parish Council
Pillerton Hersey Parish Council	Sambourne Village Association
Pillerton Priors Parish Council	Sanderson Weatherall
Preston Bagot Parish Meeting	Severn Trent Water - Network Development
Preston-on-Stour Parish Council	Severn Trent Water Ltd
Priors Hardwick Parish Meeting	Shakespeare Birthplace Trust
Priors Marston Parish Council	Shakespeare Line Promotion Group
Quinton Parish Council	Shakespokes
R Crompton	Shipston SCAN
Race Equality Support Worker	Shipston-on-Stour Local History Society
Radway Parish Council	Shipston-on-Stour Town Council
Ragley Estate	Shottery Village Association
Rail Freight Group	Shotteswell Parish Council
Railway Development Society - West Midlands	Simon Bosley
Railway Development Society (North Midlands)	Smith Bros & Webb Ltd
Ramblers Association - Southam Group	Smiths Gore
Ramblers' Association - Stratford-on-Avon Group	Snitterfield Parish Council
Ramblers Association (Warwickshire Area)	Society for the Protection of Ancient Buildings
Ratley & Upton Parish Council	Solihull Metropolitan Borough Council
Redditch Borough Council	South East Regional Assembly
Redrow Homes (Midlands)Ltd	South Northamptonshire Council
Rembitt Ltd	South Warwickshire Access Group
Residents Against Shottery Expansion (RASE)	South Warwickshire General Hospitals NHS Trust
Retirement Security Ltd	South Warwickshire Housing Association
Richard & Mandy Purser	South Warwickshire PIE - Promoting Inclusion and Enterprise
Richard Anthony Moore	South Warwickshire Primary Care Trust
Ridgewind Ltd	South Warwickshire Tourism Ltd.
RMC Group PLC	South West Regional Assembly
Roba Metals Ltd	Southam Town Council
Rochdale Canal Trust	Sport England West Midlands
Rollright Parish Council	Staverton Parish Council
Rollright Trust	
Rowan Organisation	

**List of Organisations & Individuals Contacted  
During Consultation Exercise**

Stockton Parish Council	Trinity Court Surgery
Stour Power	Trustees of the Grammar School of King Edward VI
Stowe & Co. Builders	Twentieth Century Society
Stratford District Manufacturers Association	Tysoe Parish Council
Stratford Rail Transport Group	Ufton Parish Council
Stratford Rugby Football Club	Ullenhall Parish Council
Stratford SCAN	United Co-operatives Ltd
Stratford upon Avon Town Trust	Upper & Lower Shuckburgh Parish Meeting
Stratford Voice	Upper Avon Navigation Trust
Stratford-on-Avon & South Warks Liberal Democrats	Upper Avon Navigation Trust Ltd
Stratford-on-Avon Cycling Campaign	Victorian Society
Stratford-upon-Avon Canal Society	Vinegar Hill Ltd.
Stratford-upon-Avon Rail Transport Group	W J Kliszewicz
Stratford-upon-Avon Society	Warmington Parish Council
Stratford-upon-Avon Town Council	Warwick District Council - Policy & Projects Team
Stratford-upon-Avon Town Management Partnership	Warwickshire and West Mids Association of Local Councils
Stretton-on-Fosse Parish Council	Warwickshire Association of Village Halls
Studley Liberal Democrat Team	Warwickshire County Council
Studley Parish Council	Warwickshire County Council - Countryside Recreation
Sustrans (Midlands)	Warwickshire County Council (Education)
Sutton-under-Brailes Parish Meeting	Warwickshire County Council (Museum Field Services - Archaeology)
T. Coggins	Warwickshire County Council (Museum Field Services - Ecology)
Tanworth-in-Arden Parish Council	Warwickshire County Council (Resources - Property )
Tanworth-in-Arden Residents Association	Warwickshire Fire & Rescue Service
Temple Grafton Parish Council	Warwickshire Gardens Trust
Thames Water	Warwickshire Geological Conservation Group
The Althorp Estate	Warwickshire Playing Fields Association
The Baker Trust c/o Fletcher King	Warwickshire Police
The British Wind Energy Association	Warwickshire Rural Community Council
The Catesby Property Group	Warwickshire Rural Housing Association
The Coal Authority	Warwickshire Rural Hub
Theatres Trust	Warwickshire Wildlife Trust
Thomas Whitaker	Watergall Parish Meeting
Tidbury Green Residents' Association	Waterways Trust
Tiddington Residents Association	Weethley Parish Meeting
Tiddington Road Residents Association	Welford-on-Avon Local History Society
Tidmington Parish Meeting	Welford-on-Avon Parish Council
Timothy Lea and Griffiths	Wellesbourne Parish Council
Todenham Parish Council	Wellesbourne Village Society
Tourism West Midlands	West Midlands Planning Aid Service
Town & Country Planning Association	West Midlands Regional Assembly
Town Design Group	West Midlands Strategic Health Authority
TRANSPORT 2000 (Hereford & Worcester)	
Tredington Parish Council	
Tredington Society	

**List of Organisations & Individuals Contacted  
During Consultation Exercise**

West Oxfordshire District Council  
Weston-on-Avon Parish Meeting  
Whatcote Parish Meeting  
Whichford Parish Council  
Whitchurch Parish Meeting  
William Davis Ltd  
Wilmcote Parish Council  
Winyates Green Residents Association  
Wixford Parish Council  
WMPTA (Centro)  
Wolverton Parish Council  
Women's National Commission  
Woodland Trust  
Wootton Wawen Parish Council  
Worcester City Council  
Worcestershire County Council  
World Class Stratford-upon-Avon  
Wormleighton & Stoneton Parish  
Meetings  
Wychavon District Council  
Wyre Forest District Council  
Wythall Parish Council

**List of Agents Contacted during Consultation Exercise**

A E Cox FRICS Chartered Surveyors	BDP Planning
A M Architectural Design	Beckett Associates
A. Crowson	Bell Cornwell Partnership
A. Pickford	Berry & Young
A. Sowton	Berry Morris
Acanthus Clews Architects	Bidford on Avon Residents Group (BARG)
ACL Consultants	Bigwood Ltd.
Adams Holmes Associates	BM3 Architecture Ltd
ADC Ltd.	Boreham Consulting Engineers
Adcock Associates Design Practice	Bournville Architects
Alan Smith	Boyer Planning
Alexander Corfield	Brian Barber Associates
Alfresco Design Associates Ltd.	Brian G. Manning
Allied Management Services Ltd.	Brian L. King
Allison Millward Associates	Brian R. Bassett Ltd.
Amec Design & Management	Bromley Planning
Andrew Grant & Co.	Brooke Smith Associates
Andrew Nailor	Brown Matthews
Andrew White	Brunton Design Associates
Anthony J Rickett Architects Ltd.	Building Design Services
Anthony J. Harman	Burton Emery Partnership
Architects Workshop	Business Environments Planning
Architectural Drawing Services	C J D Russell
Architecture & Planning Group	C. Baldwin
Arlington Planning Services	Calarel Design Partnership
Arlington Securities plc	Carl A Middleditch
Armstrong Burton Planning	Carter Jonas
Arrow Properties	Cartwright Marston Estate Agents
Arup Economic Consultants	Cater & Day
Ashton Planning	CB Richard Ellis
Associated Construction Consultants	Central IT Solutions Ltd.
ATIS Real Weatheralls	Chancellors, Chartered Town Planning Consultants
Atisreal	Charles Russell Solicitors
Avon Planning Services	Chartered Town Planning Consultancy
B.D.S. Marketing	Christopher Hobson
Bainbridge & Co	Christopher Stone MCIAT
Baker Associates	Clive Brook Associates
Baker Goodchild Architects	Cluttons
Banner Homes	Cofton Land & Property
Banner Homes (Midlands)	Collin Jones Partnership
Barton Fellows Ltd.	Compton Estates Management Services
Barton Willmore Planning Partnership - HQ	Cork Toft Partnership Ltd
Barton Willmore Planning Partnership-Eastern	Corstorphine & Wright
Barton Willmore Planning Partnership-Eastern	Countrywide Property Management
Basil Merrick	Court Consulting
Batterton Tyack Architects	Courtyard Designs
	Cross & Harris
	CSJ Brooke-Smith

**List of Agents Contacted during Consultation Exercise**

CT Planning	Framptons
Cullen, Carter & Hill	Frank Price
Cumming Architects	Frederick J. Young
D & T Holt	Freeth Cartwright Hunt Dickens
D N Cull	G Jones Associates
D.H. Skeats, Designer	G K Y Design, GK Y
Daly International	G V A Grimley LLP
David H. Robotham Ltd.	G.H.W. Ensor
David L. Walker Chartered Surveyors	G.P. Grima
David Lock Associates Ltd.	G.T.D. Lewis
David Storer & Partners	GB Partnership
Day Design Group, Laurie	Geoffrey Parker Bourne
Debenham, Tewson & Chesshire Ltd. - Birmingham	Geoffrey Wheeler and Associates
Debois Landscape Survey Group	GL Hearn
Denham Design Partnership	Godfrey-Payton Chartered Surveyors
Denton Wilde Sapte	Gordon Herringshaw & Associates
Derek Latham and Associates	Gough Planning Services
Design & Materials Ltd.	Gould Singleton Partnership
Development Planning & Design Services Ltd	Gouldens Solicitors
Development Planning Partnership	GR Planning Consultancy
Dilworth Design	Graham Pearce & Company
Dixon, Dobson & Carver	Graham Steventon, Chartered Architect
Donald W. Insall & Associates (Chester)	Granger & Jones
Donald W. Insall & Associates (London)	Greenwood Planning
DPDS Consulting Group	Grodon Hall
DPP	GVA Grimley LLP
Dreweatt Neate	H. Moore
Drivers Jonas	Hadland Young Ltd.
DTZ Piedad Consulting	Halcrow Fox & Associates
E.H. Marston & Co.	Halliwell Landau
E.R. Byron Associates	Hamptons
E.S. Lodge Associates	Hancocks Solicitors
Eastbrook Associates (Architects) Ltd.	Harding Design
Easy Plan Ltd.	Harris Cooper & Co.
Ecotec Research & Consulting Ltd.	Harris Lamb Chartered Surveyors
Edmund Kirby	Hawkes, Edwards & Cave
Erick Smith	Hawkesford
Entec UK Ltd.	Haxworth Architects
ERB Associates	Hayball Associates
Ernest Berry	Hayward Smart Architects Ltd.
Estee Design Ltd.	Heath Avery Partnership
Evans Hardy Bromwich	Henman Ballard
Evershed Wells & Hind	Heron Design
F.C.Newman & Co.	Highpoint Rendel
Firstplan	Hitchman Stone Partnership
Fisher German Chartered Surveyors	Hives Planning
Fordham Research Ltd.	Holden & Leonard
FPD Savills	Holmes Antill
	Holmes Bury Savage Hayward Partnership

**List of Agents Contacted during Consultation Exercise**

Horner Allen Partnership	Lawrence Jurman
Hossack Broome	Lee & Ross Architects
Howard & Seddon Partnership	Lee Evans Abbott de Moubray
Howkins & Harrison	Llewelyn-Davies Planning
Hugh Richards	Lloyds TSB - Property Management West
Hulme Upright Manning	Locke & England - Leamington
Humberts - Tetbury	Lodders Solicitors
Hunt & Wood Partnership	Longview Consultancy
Hunter Page Planning	Loveitts - Leamington Spa
Ian Sleat	Lumar Developments Ltd.
Innes England	Lyndon F. Cave
Interact Associates	M J Peters ARIBA
Intercull Designs	M.A. Riley
J Christopher Ashton	M.J. Taylor
J H Kench	MAC Design Services
J John Clink & Associate	Magdalen College - Surveyor
J. Tulip	Malcolm Scott Consultants Ltd.
J.C. Cunnane Associates	Malcolm Timms
J.D. Holmes	Manning Design Group
J.M. Chambers	Margaret Harris
Jackson-Stops & Staff	Margetts
James Barr	Marson Architects
Jesson Sewell & Swadkins	Marson Rathbone Taylor
Jigs Chana	Martin Elliot Partnership
Joe Samworth & Associates	Martineau Johnson
John B. Homer & Co.	Martyn Bramich Associates
John Bradley Associates	Matthews and Goodman
John Chivers & Sons	McCoy Associates
John Earle & Son	Michael E. Megeary
John Falconer Associates	Michael Jones
John Jones	Michael Partridge Partnership
John P. Morris	Michael Reardon & Associates
John Pass Associates	Mono Consulting Ltd
John Phillips Planning Consultants	Mrs. M.G. Phillips
John Spall Design Associates	MVM Planning Ltd
Jones Lang LaSalle	Nabarro Nathanson
K. Coffey	Nathaniel Lichfield & Partners - London
Kember Loudon Williams	Needham & James
King Sturge	Neil Shepherd Design Ltd.
Knight Frank - London	Nicholas de Jong Associates
Knight Frank - Hereford	Nicholas Haycock & Co
L.M. Uzzells, Designs	Noralle Building Design Services
Lambert Smith Hampton	Oldfield King Planning
Lancelot Dyson Associates	O'Neill & Bracewell Partnership
Land Design Associates	Ove Arup Partnership
Land Use Consultants	Oxfordshire Building Surveying & Design Ltd.
Landmark Information Group	P. Stanton, Esq
Lanesfield Technical Design	P. Wilkes
Lapworth Partnership Chartered Architects	P.D.B. Construction Services, PDB

**List of Agents Contacted during Consultation Exercise**

P.J. Rushton	Robert Franklin Architects
P.N. Seabourne	Robert L. Blackburn
P.T. Pratt	Robert Lunn & Lowth
Patrick J. Burton	Robert Stephenson Associates
Paul Dickinson Associates	Robert Turley Associates - Birmingham
Paul Kentish & Co	Robert Turley Associates - London
Paul Richardson Architects	Robert Turley Associates - Winchester
Paul Upfield	Roberts & Lloyd
Peacock & Smith	Rodney Crossley
Pegasus Planning Group	Rodney Melville & Partners
Pegasus Planning Group (East Midlands)	Roger Abbott RIBA
Peter Clarke & Co.	Roger Evans Associates
Peter Draper Associates	Roger P. Dudley & Associates
Peter E. Williams, Building & Design Consultant	Roger Stretton Architects
Peter Green Associates	Roger Tym & Partners
Peter Seccombe & Sarah Douglas	Roy Geden
Peter Short R.I.B.A., Chartered Architect	RPS Group plc
Peter Storrie & Associates	RPS Planning, Transport & Environment Ltd.
Phillips Planning Services Ltd	Russell Little & Platt
Pinsent Curtis	S W Hinton BSc MRICS
Planaconstruct Ltd.	Sanderson Weatherall
Planning Potential	Savills
Professor Alan Hooper	SB Architectural Design
Progression Architects Ltd.	Schoonberg Walker and Associates
R & B M Gale	Set Design
R. Burman	Sheldon Bosley & Partners
R. Holtom	Shipway, Doble & Earle - Redditch
R. John Craddock Associates	Shoosmiths Solicitors
R.A. Dunn	Simon Herrick
R.A. Newton	Simon Taylor, Chartered Town Planner
R.C. Lamb	Skillington Payne
R.J. Durrell	Smith Stuart Reynolds
R.W. Fryer	Spencers
Rachel Berger	Stanley Partnership
Ragley Estate	Stansgate Planning Consultants
Rajkowski Architectural & Building Services	Star Planning & Development
Ralphs & Janes	Steven Holloway
Rapleys	Stewart Ross Associates
Raymond Smith	Stewart Vick Associates
Reg Ellis	Stonehouse Chartered Surveyors
Richard Chivers	Stoneleigh Planning Partnership
Richard Crook	Strutt & Parker
Richard Merrett	Sutch & Thos. Hemming & Son
Richard S Bailey RIBA	Sutton & Wilkinson
Ridgehaven Project Development	T G C Ford
RMJM Planning Ltd.	T.E. Leivers
Robert Cartwright & Co.	T.J. McHugh
Robert F. Smith	T.S.E. Cooper
	Terence O'Rourke

**List of Agents Contacted during Consultation Exercise**

Terry J. Hart  
Tetlow King Planning  
The Residents of Friday Furlong  
The Roger Coy Partnership  
Thornton Hartnell Chartered Architects  
Three Counties Insurance Brokers  
Tim North Associates  
Timothy Lea & Griffiths  
Titmuss Sainer and Webb  
Tom Cole  
Tony Thorpe Associates  
Trevor Bury  
Tribal MJP  
Tweedale Planning & Design Group  
Tyler-Parkes Partnership  
Vicki Gittus  
Vincent & Gorbng Planning Associates  
W.J.L. Weaver  
W.M. Chapman  
Walker Troup Architects Ltd.  
Wallis Design Associates  
Warwick Estates  
Weatherall, Green & Smith  
White Young Green Planning  
William McFarland  
Wood Frampton  
Woolf Bond Planning LLP  
Wootton Jeffreys Consultants Ltd -  
Epsom  
Wright Hassall & Co.  
WS Atkins Transportation Engineering  
WTS Ltd

**Meeting Housing Needs – Draft Supplementary Planning Document (Sept 2007)  
Schedule of Representations Received and the Council’s Response.**

Changes made to the text of the SPD are shown in **bold**. ‘No change’ was made to text of SPD unless otherwise stated

<b>Consultee</b>	<b>Section of SPD</b>	<b>Summary of Representation</b>	<b>The Council’s Response</b>
Cotswold Conservation Board	General	<p>1.1 Welcomes much of the content especially the acknowledgement that the provision of 100% affordable housing can be justified and the attempt to reduce the cost of land.</p> <p>1.2 SPD should include a policy to secure affordable housing from the conversion of rural buildings, in appropriate locations and justified by needs surveys.</p> <p>1.3 S106 funds generated from urban sites could be used to fund 100% affordable housing on small rural sites.</p> <p>1.4 Welcomes importance given to Parish Plans.</p> <p>1.5 Welcomes the acknowledgement of the AONB Management Plan.</p>	<p>1.1 Support noted and welcome</p> <p>1.2 Not accepted – It is considered that the existing policies of the Local Plan would enable such provision to be made and there is no need to introduce a new policy in this SPD.</p> <p>1.3 Accept – the arrangements for the use of financial contributions towards off site affordable housing are set out at para 8.4.9 and would enable the use of funds across Stratford District.</p> <p>1.4 and 1.5 Support noted and welcome</p>
John Power	Section 4	2.1 Support the involvement of local communities at the beginning of a proposal	2.1 Support noted and welcome.
	Section 6.4.9	2.2 Proper arrangements should be put in	2.2 Comments noted and understood but are

	Section 8  General	place to secure infrastructure to serve the needs of new communities. Detailed examples are given.  2.3 Support points made at 8.3.11 and 8.3.12.  2.4 Well-written and researched document which should come to fruition.	beyond the scope of this SPD  2.3 and 2.4 Support noted and welcome
Welford-on-Avon Parish Council	4.13  1.6.2  5.3.2	3.1 Support the 'bottom-up' approach to housing development.  3.2 Concerned about the implications of introducing Local Development Orders for certain categories of affordable housing. Request para 1.6.2 is extended to read:  ' affordable homes. <u>Any such planning permission in Main Rural Centres and Local Centre Villages will be confined to meeting properly identified and quantified housing needs on land that has been offered for development by landowners in accordance with an adopted Town or Parish Plan.</u> '  3.3 This section could be construed to mean that housing needs surveys should always precede a Parish Plan. Para 2 of 5.3.2 should be changed to read:  <u>2. 'A housing needs survey should be undertaken and its results taken into account when formulating action plans associated</u>	3.1 Support noted and welcome.  3.2 Not accepted – Section 1.6 deals with future measures which could be brought forward through the preparation of the Local Development Framework, in particular the Core Strategy. Including this section within the SPD appears to have caused some confusion and has attracted criticism. <b>It is therefore recommended that Section 1.6 , including para 1.6.2, be deleted in its entirety.</b>  3.3 Partially accepted – Para 5.3.2 sets out best practice in recommending that housing needs surveys are undertaken before Parish Plans are finalised. It is however recognised that this may not always be possible or appropriate. It is therefore recommended that a minor amendment be made to part 2 of para 5.3.2 to read:

	9.4.6	<p><u>with housing matters in a Parish/Town Plan</u>.</p> <p>3.4 Should be modified to read:</p> <p>3. ' Information about local demand <u>(including the results of any recent community led housing needs survey)</u> and market conditions for any given stock profile in the locality.'</p>	<p>'2. A local housing needs survey is undertaken wherever possible before finalising any action plan, policies or recommendations in a Parish/Town Plan.'</p> <p>3.4 Accept – the addition of the reference to community led housing needs survey would be helpful. It is recommended that part 3 of para 9.4.6 be amended to read:</p> <p>'3. Information about local demand <b>(including the results of any recent community led housing needs survey)</b> and market conditions for any given stock profile in the locality.'</p>
	9.2.2	<p>3.5 Physical and social integration of market and affordable housing may be compromised if a site is developed in separate stages. The following should be added to 9.2.2 (5) (a) :</p> <p>(a) '.... Of locations. <u>In assessing the adequacy of pepper potting in a scheme, any existing development that includes affordable housing will be taken into account.</u>'</p>	<p>3.5 Accept – the additional wording suggested would be helpful. It is therefore recommended that part 5(a) of para 9.2.2 be amended by the addition of the following:</p> <p><b>'In assessing the adequacy of pepper potting in a scheme, any existing development that includes affordable housing will be taken into account.'</b></p>
Shottery Village Association	General	<p>4.1 New house building should be tightly controlled and provide only for local need.</p> <p>4.2 Development should not be allowed in areas of flood risk.</p>	<p>4.1 and 4.2 – Comments noted, but these are matters to be addressed through the Local Development Framework Core Strategy rather than in this SPD.</p>
Council for British	General	5.1 The SPD and the Sustainability Appraisal	5.1 – The scope of the SPD is necessarily

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Archaeology		fails to address other spatial planning issues in particular the historic environment.	limited to meeting housing needs. Other spatial planning issues such as the historic environment are covered elsewhere in the Council's planning policies. The Sustainability Framework does address issues such as the built environment and heritage.
West Midlands RSL Planning Consortium (c/o Tetlow King Planning)	<p>1. Introduction</p> <p>2. Local Housing Need.</p> <p>3. Development Plan and other SPDs</p> <p>4. Developing Community Initiative and Public Confidence</p> <p>5. Addressing Rural Housing Needs</p> <p>6. Maximising the Supply of</p>	<p>6.1 Welcome the draft SPD, but should include reference to affordable housing in the introduction.</p> <p>6.2 General support and agree that an increase in overall supply would not help to address the acute affordable housing needs of the district.</p> <p>6.3 Support – especially the exclusion of 100% affordable housing sites from the Managing Housing Supply SPD.</p> <p>6.4 Welcome the intention to increase community involvement, but this should not prevent the delivery of housing.</p> <p>6.5 Support the provisions of this section.</p> <p>6.6 Agree that 35% should be the minimum requirement, but concerned that the lack of a</p>	<p>6.1 Support is noted and welcome. The introduction makes it clear that the SPD relates to both affordable and market and aim 3 refers specifically to boosting the supply of affordable housing.</p> <p>6.2 Support noted and welcome</p> <p>6.3 Support noted and welcome.</p> <p>6.4 This point is understood because delivery is critical in terms of our role. However the philosophy behind MHN1 is set out in section 4.1 and effective community involvement should assist housing delivery.</p> <p>6.5 Support noted and welcome.</p> <p>6.6 Partially Accept – Many of the respondents to the SPD have objected to the proposal in</p>

	<p>Affordable Housing</p>	<p>specified target creates uncertainty regarding the level of affordable housing that will be sought. Support the requirement to secure affordable housing from sheltered housing and extra care schemes.</p>	<p>MHN3 to seek the maximum viable proportion of on-site affordable housing provision from every site. In the light of the representations received the Council recognises the practical difficulties involved in moving to a system of seeking a variable proportion of affordable housing at the present time. The best option would be to revert to the current position of seeking a minimum fixed percentage. It is recommended that the Executive should consider increasing the percentage from 35% to 40% in recognition of the levels of need identified in the Joint Housing Assessment. It is also apparent that other local planning authorities in the South Housing Market Area have been able to sustain this percentage without adversely affecting viability of development. It is therefore recommended that the first para of MHN3 be amended to read:</p> <p><b>'A minimum of 35% on site affordable housing provision will be sought from every site to which Policy COM.13 applies,</b> subject to the application of Key Principles MHN9 (funding of affordable housing and MHN10 (order of preference for the location of affordable housing.)'</p>
	<p>7. Affordable Housing : Definition and Standards</p>	<p>6.7 Support provisions of this section, but also consider that a pro-forma S106 agreement should be included as an appendix and that the issues raised in Policy COM.13 such as timing of delivery, terms and</p>	<p>6.7 Partially accept - Since the consultation exercise on the draft SPD, further work has been undertaken on revising the model S.106 Agreement and associated heads of terms. A background paper on this matter is now</p>

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	<p>8. Funding and location of Affordable Housing</p> <p>9. Creating Balanced Communities</p> <p>10. Responding to Climate Change</p> <p>General</p>	<p>occupancy should be reiterated in the SPD.</p> <p>6.8 Support provisions of this section.</p> <p>6.9 Support provisions of this section, but consider there should be greater flexibility to allow affordable housing to be clustered in groups of 10-15 houses on larger sites in urban areas.</p> <p>6.10 Support provisions of this section.</p> <p>6.11 The following issues should also be addressed by the SPD:  1. Other housing needs information and future monitoring and review.  2. A clear procedure for negotiations with developers  3. Pro-forma s106 clauses  4. Car parking standards</p>	<p>nearing completion but was unfortunately not available in time for the consultation exercise. The paper is probably too long and detailed to incorporate within the SPD itself, but it will be published as a freestanding document.</p> <p>6.8 Support noted and welcome.</p> <p>6.9 Comments noted – it is assumed this concern relates to the advice in 9.2.5. However MHN12(5)(a) is expressed as a general principle, reflecting the fact that design solutions can and should be tailored to individual circumstances.</p> <p>6.10 Support noted and welcome.</p> <p>6.11 Not accepted – the Council has received a number of objections on the basis that the SPD is already overly long and complex. The addition of further information would exacerbate this. There is a clear commitment to monitor and review the SPD and a pro-forma S106 agreement will be published separately. Car Parking standards are covered by another SPD.</p>
Bigwood on behalf of various clients	1. Introduction	7.1 The introduction should: 1. include a specific aim to provide for the	7.1 Not accepted – the scope of the SPD is considered to be appropriate. It is

	<p>Policy CTY.5</p> <p>MHN.4</p>	<p>elderly 2. include a specific aim to provide 'low cost' housing for first time buyers.</p> <p>7.2 Timing of the document is illogical and unreasonable and should await the adoption of the RSS.</p> <p>7.3 Should consider a review of the moratorium to achieve a higher rate.</p> <p>7.4 Should be available for all settlements not just smaller villages. Policy should be amended.</p> <p>7.5 Object to the inclusion of the requirement for affordable housing associated with 'extra care' accommodation for the elderly. This is not reasonable or acceptable in planning law and would provide a considerable restraint on the development of care villages. Reference to 'extra care' housing should be deleted.</p>	<p>acknowledged that further work is required in respect of meeting the needs of older people and this will be progressed through the LDF Core Strategy. Low cost market housing does not fall within the definition of affordable housing set out in Annex B of PPS3.</p> <p>7.2 Not accepted – the timing is fully justified by the circumstances set out in section 1.2.</p> <p>7.3 Not accepted – this is beyond the scope of this SPD.</p> <p>7.4 This is a matter for the Core Strategy DPD.</p> <p>7.5 Not accepted – MHN4 seeks to interpret and clarify COM.13. The provision of affordable accommodation for older people is equally important to the provision of affordable housing for other sections of the community. However in the light of the representations received some further explanatory text regarding criterion (1) is proposed to clarify the distinction between C2 &amp; C3 uses when calculating floor areas and confirm that the requirement will not apply to genuinely C2 uses. It is recommended that the following para be added to after para 6.4.8:</p> <p><b>'Criterion 1 will not be applied to those uses which clearly fall within Class C2 of</b></p>
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		<p>7.12 To mix and require care as part of sheltered housing is wrong – sub-clause 1(c) needs amending.</p> <p>7.13 Para 3 – the restrictions on provision are unreasonable and should be withdrawn.</p> <p>7.14. Para 5 – Design is more important to the integration of market and affordable housing rather than ‘pepper potting’ Delete sub clause (a) which deals with ‘pepper potting’.</p> <p>7.15 Fundamentally object to Policy (1)(a) which seeks to restrict the provision of studio</p>	<p>changes are recommended:</p> <p><b>1. That para 1 (a) be deleted.</b></p> <p><b>2. That existing para 1(b) be amended to read: ‘In the case of market housing, dwellings should normally be provided broadly in the following proportions: 75% two or three bedroom dwellings ( of which a maximum of 25% of overall market stock may be flats) 25% all other dwelling sizes.’</b></p> <p>7.12 Not accepted - ‘Care’ per se is not required. Rather, the intention is to ensure that the design and construction of all specialised new build is capable of supporting the delivery of care packages.</p> <p>7.13 Not accepted – The approach is considered to be reasonable in the light of national guidance in PPS3, the provisions of Policy COM.14 and the findings of the Joint Housing Assessment.</p> <p>7.14 Not accepted – see response at 6.9 above.</p> <p>7.15. Accepted – see proposed changes to MHN.12 set out above which includes the</p>
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		<p>or 1 bed dwellings. This will prevent the provision of low cost dwellings and certainly should not be applied to provision for the elderly or for care. The LPA should have a completely different policy for the provision of accommodation for the elderly including those in need of 'care'.</p>	<p>deletion of para 1(a).</p>
	MHN.13	<p>7.16 There is no reasoned justification for the 50% criteria, this should be left to the housing provider. Reference to 'extra care' is unreasonable.</p>	<p>7.16 Not accepted - There are strong arguments for seeking to secure housing which meets certain accessibility standards and is capable of being adapted to meet changing circumstances. It is proposed however that the wording of MHN 13 should be amended to 'encourage' provision rather than 'require'.</p>
	MHN14	<p>7.17 This policy which aims to control housing mix by tenure and dwelling size is fundamentally unreasonable and interferes with provision by the market. It should be withdrawn in its entirety.</p>	<p>7.17 Not accepted – MHN.14 applies only to affordable housing and is derived from the Council's existing adopted policies.</p>
	General	<p>7.18 The draft SPD creates a complicated regime which will not assist the delivery of housing in the area. It will create additional delays adding to the cost of schemes. It should be thoroughly reviewed and made simpler in order to deliver housing over the next 19 years.</p>	<p>7.18 Comments noted – a number of changes are proposed which should address some of these concerns.</p>
Environment Agency	10 – Responding to Climate Change	<p>8.1 Welcome reference to storm water run-off attenuation but would to see and additional key principle dealing with</p>	<p>8.1 Comments are noted, but this issue is dealt with in more detail by another SPD.</p>

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		Sustainable Drainage Systems. A detailed wording is provided ( see original representation for details)	
Alcester Estates Ltd	9 Creating Balanced Communities	9.1 The restrictive clause preventing the provision of studio or one bedroom dwellings should be deleted. There is an undoubtedly a demand for this type of property. The clause places an artificial constraint on sustainable mixed development.	9.1 Accepted – see change proposed at 7.11 above.
Warwickshire Museum – Field Services (Ecology)	Section 10	10.1 Welcome the support in para 10.3.2 for providing soft landscaped areas which could also contribute to biodiversity.	10.1 Support noted and welcome.
CT Planning on behalf of Gallagher Estates and JS Bloor (Services) Ltd.	General	11.1 The SPD seeks to introduce radical changes to planning policy for market and affordable housing which should be subject to the proper scrutiny afforded by a Development Plan Document (DPD). The SPD should be abandoned and brought forward as a DPD under the Local Development Framework.  11.2 The draft is too prescriptive and includes principles which are dealt with by other disciplines such as Building Control. There is a real risk that the detail and complexity of the SPD could stifle the development it seeks to secure.	11.1 Not accepted – the SPD provides interpretation and guidance on the application of existing adopted Local Plan policies. In doing so it has sought to take account of changes in national policy and new evidence such as the Joint Housing Assessment.  11.2 Comments noted and changes are proposed which may address some of these concerns.
	MHN.1	11.3 Draft SPD implies at para 4.2.1 that Parish Plans have a role to play in informing	11.3 Not accepted - As a point of fact, the 1 <sup>st</sup> part of COM.1 applies to <u>all</u> locations.

	<p>MHN.2</p> <p>MHN.7</p> <p>MHN.8</p>	<p>applications in all settlements. This appears to be at odds with the parent policy COM.1 In order to expedite applications it is likely that costs of housing needs surveys will fall on developers.</p> <p>11.4 The statement ' preference will be given to those schemes that maximise the provision of affordable housing' suggests that there will be competing applications for sites at any one time which will not be the case. The drive to maximise affordable housing provision should not be at the expense of other land use objectives.</p> <p>11.5 Para 7.2.2 acknowledges that non RSLs can now bid for social housing grant, but para 7.3.3 implies that the Council will only invite 'partner housing associations' to be involved in projects. This is contrary to the Enterprise Act. The policy should be concerned only with the provision of the housing not with the body which provides it.</p> <p>11.6 Policy is unnecessary and not a matter for the land use planning system. Clarification is sought on the accuracy of para 8.3.7 regarding availability of grant on developer-led sites.</p>	<p>11.4 Accept – Having considered the representations received it is accepted that the means of implementing this principle are at best unclear. <b>It is therefore recommended that MHN2 be deleted.</b></p> <p>11.5 Not accepted – para 7.3.3 highlights the use of partner housing associations as best practice, but not as an absolute requirement.</p> <p>11.6 Not accepted - The proposed introduction of MHN8 reflects the thrust of PPS3 to achieve high quality housing. The introduction of quality benchmarks is a practical means of achieving this. Historically, the involvement of partner housing associations has provided a 'proxy' quality assurance mechanism. Further guidance is required to ensure quality standards on all developments including those which are provided by non RSLs.</p>
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	MHN.9	11.7 This policy is unnecessary. Funding is a matter for negotiation between the RSL and the developer. The requirement to submit financial appraisal and residual land value calculations in all cases is over zealous.	11.7 Partially accepted - the justification for the policy (which is based on the Council's existing policy approach) is clearly set out in section 8.3. However consequential changes are needed in response to the proposed changes to MHN3. These changes would mean that financial appraisals and residual land value calculations would only be required in those cases where developers claim that they are unable to deliver the minimum proportion of affordable housing. <b>It is recommended that para (2) of MHN9 be amended to read:</b>  <b>'A financial appraisal and residual land value calculation (or series of such calculations) will be required to be submitted with any planning application where the level of affordable housing proposed is below the minimum proportion set out in Key Principle MHN3.'</b>
	MHN.12	11.8 Policy is over-prescriptive. The mix dwellings including the provision of studio and one bed dwellings should be left to the market. Pepper-potting of affordable housing is often unpopular with RSLs and causes problems for the logistics of construction and management.	11.8 Partially accepted – see change proposed at 7.11 above.
	MHN.13	11.9 Construction of properties to Lifetime Homes standards is a matter for Building Control not planning policy.	11.9 Not accepted - Lifetime Homes standards also deal with issues of versatility and flexibility which are important in strategic housing terms, but currently outside the scope of the Building

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	MHN.14	11.10 Policy is inflexible, unclear and unduly complicated.	Regulations. See change proposed at 7.16 above.  11.10 Not accepted – MHN14 offers flexibility by identifying circumstances where the optimum stock profile could be varied.
	MHN.15	11.11 Internal floorspace should be agreed between RSLs and developers not specified in the SPD.	11.11 Disagree. MHN15 reflects our existing adopted policy approach on this matter.
	MHN.16	11.12 The requirement to achieve Level 3 of the Code for Sustainable Homes is a matter for Building Control not planning policy.	11.12 Not accepted - the Code for Sustainable Homes addresses issues wider than the scope of the Building Regulations. Policy SR3 of the Regional Spatial Strategy (Phase 2 –Preferred Option) states that all new homes should meet at least level 3 of the code. The RSS expects this requirement to be reflected in the LDDs prepared by local planning authorities.
Sanderson Weatherall – Brockhall Village (Tern Hill) Ltd	MHN 4	12.1 Object to the inclusion of the 'live/work' accommodation within the scope of affordable housing policies through this SPD as it would be unreasonable on the following grounds: 1. There is no credible evidence to support the need for affordable live/work units 2. There is no reference in national, regional or development plan policy to the need for affordable live/work units. 3. The draft SPD lacks any detailed advice and it is doubted that the inclusion of live/work units is soundly based. 4. The extension of policy in this way should	12.1 Partially accepted - Clearer advice in the explanatory text on how criterion (2) will be applied would be beneficial. <b>It is recommended that some explanatory text be inserted to clarify that criteria (2) should not apply if the residential element is clearly ancillary to the business use, as Policy COM.13 relates only to residential uses.</b>

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		<p>be done through a DPD not and SPD.            5. There is no identified delivery mechanism.            6. It could frustrate the achievement of other regeneration initiatives.</p>	
William Davis Ltd	<p>MHN.1</p> <p>Policies MHN.2, 3 and 9</p> <p>MHN.8</p> <p>MHN.12</p> <p>MHN.13</p>	<p>13.1 The policy set out in MHN.1 and Appendix 5 goes beyond and conflicts with the Council's adopted Statement of Community Involvement.</p> <p>13.2 These policies which require a financial appraisal and residual land value calculation for every planning application are unworkable and will restrict the supply of housing land. These proposals conflict with PPS3 which states that LPAs should set an overall target for the amount of affordable housing to be provided.</p> <p>13.3 Imposition of quality benchmarks on schemes which do not have any public subsidy is wholly unreasonable and will impose additional costs and fetter the operation of RSLs and other providers.</p> <p>13.4 Object to the prescriptive stance taken towards the provision of market housing stock mix which conflicts with PPS. Integration of affordable housing is best achieved by good design rather than 'pepper potting'. Reference to pepper potting should be deleted</p> <p>13.5 Object to the requirement for 50%</p>	<p>13.1 Not accepted – it is considered that the approach set out in MHN1 and Appendix 5 develops the principles set out in the SCI and does not conflict with it.</p> <p>13.2 Accepted – changes are proposed to address these concerns. See responses 7.11, 11.4 and 11.7 above.</p> <p>13.3 – Not accepted – see response at 11.6 above.</p> <p>13.4 – Partially accepted – see response at 7.11 above.</p> <p>13.5 – Not accepted – see response at 7.16</p>

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	MHN.16	<p>provision of 'Lifetime Homes'. The effect of this in ruling out sheltered housing for the elderly other than those providing 'extra care' is misguided. Opportunities to meet the needs of the elderly will be lost.</p> <p>13.6 Policies to promote sustainable development which require higher levels of building performance should be done in a Development Plan Document and not through SPD.</p>	<p>above. MHN13 seeks to encourage 'extra care' housing, but does not rule out other forms of provision such as sheltered housing.</p> <p>13.6 Not accepted – see response at 11.12 above. Policy SR3 of the RSS Phase 2 revision refers to all Local Development Documents, which implies that policies can be included in SPDs as well as or instead of DPDs. Failure to address this issue now will frustrate the implementation of national policy as set out in the Climate Change PPS.</p>
Advantage West Midlands	General	14.1 The draft SPD puts in place a planning led approach to the creation of a balanced housing market in Stratford-on-Avon and in doing so contributes to the West Midlands Economic Strategy.	14.1 Support noted and welcome.
Stansgate Planning on behalf of : Mr Ian Fraser Mr Peter Brooks Edith and Jack Griffiths Charitable Trust Namco Tooling Ltd Mr and Mrs Smith Stratford-upon-Avon Town Trust Mr M Bryan The Walton Estate	General          1. Introduction	<p>15.1 The proposed SPD will not achieve or encourage the range of housing required in the District, but would have the reverse effect. Document is too lengthy and complex – substantial editing is required. Affordable and market housing issues are intertwined in some places but treated separately elsewhere. The highlighting of 'best practice' should be avoided.</p> <p>15.2 Para 1.6.2 – there is no objection to introducing Local Development Orders but extending the 'Local Choice' initiative will</p>	<p>15.1 Partially accepted – changes are proposed which address some of these concerns.</p> <p>15.2 It is proposed to delete section 1.6 – see response 3.2 above.</p>

<p>Mr David Tucker Duchess Dudley Charity</p>	<p>2. Boosting Housing Supply</p>	<p>have little benefit. Prospects for reaching strategic target are bleak if the 'local choice' initiative is rolled out to Stratford town.</p> <p>15.3 Para 3.3.7 refers to the Local Choice SPD. Unfortunately the local choice initiative has failed to deliver and this new Draft SPD will further undermine public confidence and fail to deliver affordable housing in rural areas.</p> <p>15.4 Para 4.3.5 considers restricting the purchase of properties for buy to let or second homes. This should not be pursued and represents a major infringement on the rights to own property. Privately rented properties are an essential source of affordable accommodation for those who cannot buy and do not qualify for social housing. Holiday homes bring benefits to the local economy.</p> <p>15.5 The measures set out in Policy MHN3 and point 2(b) of MHN9 and in para 1.6.3 and 4.3.6 are counterproductive to the aim of increasing the level of affordable housing across the District. Landowners will not bring land forward and the SPD will act as a disincentive to providing more homes.</p> <p>15.6 Para 5.2.3 and 5.3.2 – landowners will not undertake lengthy public consultation of the only reward is to 'break even'. This amounts to a development land tax which</p>	<p>15.3 Not accepted - although not directly a matter for the SPD. On the contrary, the Local Choice initiative has started to deliver housing that would not otherwise have been built.</p> <p>15.4 Comments noted - This is a matter for the Core Strategy DPD and was raised in the SPD in order to seek views. It will be deleted in the final SPD. <b>It is recommended that para 4.3.5 be deleted.</b></p> <p>15.5 Accepted – changes are proposed to address these concerns. See responses 3.2, 7.11, 11.4 and 11.7 above. <b>Additionally it is recommended that para 4.3.6 be deleted.</b></p> <p>15.6 Comments noted – these concerns should be addressed by the proposed changes referred to in 15.5 above.</p>
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		<p>could be levied at 100% of the land value in a manner contrary to the UK tax regime.</p> <p>15.7 Para 5.4.3 should refer to appendix 5 of the Local Choice SPD.</p> <p>15.8 MHN2 states that preference will be given to those schemes that maximise the proportion of affordable housing. This policy will be unwieldy, unworkable and inhibit the supply of affordable homes (six specific reasons are set out to support this statement)</p> <p>15.9 Para 6.4.3 introduces the variable percentage model, but also set 35% as a minimum. If the variable percentage model has any merit there should be no mention of a minimum threshold. If the residual land value calculation justifies a provision of less than 35% this should be accepted. There are significant flaws in the variable percentage model. The preferred option should be a fixed percentage target which has the merits of clarity and simplicity.</p> <p>15.10 Para 6.4.12 to 6.4.14 – the reference to the use of Compulsory Purchase powers has a menacing tone and they should be deleted.</p> <p>15.11 Para 6.4.7 should make it clear that Policy COM.13 does <u>not</u> relate to sheltered or</p>	<p>15.7 Accepted - <b>a reference to the Local Choice SPD will be included.</b></p> <p>15.8 Accepted – see proposed change at 11.4 above.</p> <p>15.9 Accepted – see proposed change at 6.6 above.</p> <p>15.10 Not accepted – MHN16 reflects the delivery agenda in PPS3 and stresses that CPO powers would only be used in exceptional circumstances</p> <p>15.11 Not accepted – however see response and proposed changes at 7.5 and 12.1 above.</p>
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	<p>Part 3 – Effective Delivery and Implementation</p>	<p>extra care housing schemes for the elderly. Similarly it should not relate to live-work units. (four specific reasons are set out to support this statement)</p> <p>15.12 MHN5 and para 6.4.10 relating to the impact of greater student numbers is rather vague. Unless meaningful housing market indicators or thresholds can be included in the SPD this policy should be deleted.</p> <p>15.13 The definition of affordable housing given by Policy MHN7 should include 'intermediate affordable housing' as defined by Annex B of PPS3.</p> <p>15.14 Paras 7.2.1 to 7.2.3 and 7.3.1 to 7.3.3 raise the expectation of involvement with the Councils partner Housing Associations. These paras should be deleted. The advantages of using the partner RSLs need to be explained and measured against the benefits of wider choice, innovation and value for money by encouraging a deeper pool of RSLs and other providers.</p>	<p>15.12 Not accepted -The objective of MHN5 is to ensure that housing market impacts are taken into account and, where necessary, mitigated when considering proposals for new or expanded educational facilities. It therefore has significant value in strategic housing terms.</p> <p>15.13 Not accepted - the inclusion of the words 'in practice' in part (1) of MHN7 is significant because workable models for effective delivery of other forms of intermediate housing apart from Shared Ownership have not yet been fully developed locally.</p> <p>15.14 Partially accepted – The Council considers that there are advantages in working with partner Housing Associations as set out in para 7.2.1. The principle advantage relates to the greater degree of assurance to the Council and local communities regarding the delivery and quality of new affordable homes. Recognising the concerns raised <b>it is recommended that the first sentence of para 7.2.3 be amended to read:</b></p> <p><b>' The Council still considers that there are advantages to be gained in working with its partner housing associations.'</b></p>
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	<p>Part 4 – Improving Sustainability</p>	<p>15.15 MHN8 – the quality benchmarks are flawed and the attempt to control quality is excessive and unwarranted. The wording of MHN8 is vague, unsound and repetitive. (seven specific reasons are set out to support this statement). If benchmarks are required they should be secured by condition and not S106 agreements.</p> <p>15.16 Para7.4.3 – SPD should be written more clearly so that applicants can understand what legal and administrative costs they will be expected to bear in S106 agreements. MHN9 securing the Council’s costs through a section 106 agreement is cumbersome. The current practice of invoicing prior to the release of an agreement should continue. Requiring applicants to cover other costs relating to negotiation, administration and monitoring is unreasonable and should be covered by the application fee.</p> <p>15.17 Para 8.3.12 - this para should make the Council’s position clear regarding viability i.e. that landowners and developers should expect to do no more than ‘break even’.</p> <p>15.18 Para 8.4.9 - this para should include a requirement to pay the applicant any interest which has accrued on financial contributions which remain unspent after 7 years.</p> <p>15.19 Policy MHN12 seeks to prevent the</p>	<p>15.15 Not accepted – see response at 11.6 above. Section 106 agreements can legitimately address these issues and are more appropriate than conditions in this case.</p> <p>15.16 – Partially accepted – see changes proposed at 7.10 above.</p> <p>15.17 – Comment noted – changes are proposed elsewhere which address this concern without the need for any further change to this para.</p> <p>15.18 – Comment noted – this is a matter of detail to be resolved by the legal agreement.</p> <p>15.19 – Partially accepted – see response and</p>
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		<p>construction of one-bed or studio dwellings. This position is not supported by the Joint Housing Assessment. The development of one-bed units should be encouraged, not hindered. Whilst seeking to secure a mix of housing is laudable the requirements of para 1(b) are unnecessary and unduly prescriptive. A blunt district-wide standard applicable to all sites runs counter to the more sophisticated approach envisaged by Policy COM14.</p> <p>15.20 The imposition of minimum garden sizes for all properties in MHN13 will narrow the range of homes that are available and restricts the freedom of purchasers to decide the size of garden to suit their needs. Table 1 should make it clear that this does not apply to flatted development.</p> <p>15.21 Confusingly MHN15 deals with minimum floor areas for affordable housing but not market housing. Neither floorspace or garden standards should be applied to market houses.</p> <p>15.22 MHN14 – the information provided in table 2 does not form a useful basis for</p>	<p>changes proposed at 7.11 above.</p> <p>15.20 Partially accepted – It is agreed that greater flexibility should be provided whilst still ensuring that full consideration is given to the need to provide usable private garden areas. <b>It is therefore recommended that the final sentence of MHN13 be deleted and the following be added to the end of para (3):</b></p> <p><b>'Table 1 below provides guidance on indicative garden areas for different dwelling types. For the avoidance of doubt these do not apply to flatted development.'</b></p> <p>15.21 – Not accepted – the scope of MHN15 is clear and it is not intended to apply floorspace requirements to market housing.</p> <p>15.22 – Not accepted – the district wide table is based on the evidence provided by the Joint</p>
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	Conclusions	<p>development appraisal. Other factors such as local site conditions, local needs surveys and waiting lists are likely to be more important than a district-wide table that is fixed in time.</p> <p>15.23 The needs of the District involve more than just providing the maximum number of social rented dwellings to be managed by RSLs, chosen by the Council, and for which the Council has full nomination rights. A much wider range of dwellings needs to be provided. The draft SPD is fundamentally flawed and should be abandoned. A less bureaucratic model should be followed to deliver the homes required in the District by 2026.</p>	<p>Housing Assessment. MHN14 provides the flexibility to vary from the district wide profile, where this is justified by local circumstances.</p> <p>15.23 Comments noted – A number of changes are proposed which will address these concerns, at least in part. The more fundamental issues raised can only be addressed through the LDF Core Strategy.</p>
Barton Willmore on behalf of: George Wimpey West Midlands Taylor Wimpey Developments Ltd	Para 2.7.3	16.1 Shortage of affordable housing is a direct consequence of the moratorium. Developers should not have to provide affordable housing in new development to meet backlogs created by the Council's restriction on housing supply.	16.1 Not accepted - As a point of fact, the shortage of affordable housing is a long-standing issue, pre-dating the moratorium.
	2.7.4	16.2 Do not agree with the Council's view that merely increasing the supply of new housing will not deliver increased affordable housing. Increasing the supply of housing land will have a significant impact on the supply of affordable housing. This is acknowledged by the Prime Minister and the Secretary of State Yvette Cooper.	16.2 Not accepted – para 2.7.4 states that simply increasing overall supply would not in itself be particularly effective at addressing local housing need. A more sophisticated approach is required.
	2.7.6	16.3 Confirms that 74.9% of affordable	16.3 Comment noted.

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		housing is provided on 'developer led' sites. If these sites don't come forward then the principle source of affordable housing is lost.	
	6.3.2	16.4 It is unclear how the principle of allowing sites to come forward which maximise the provision of affordable housing will be applied in practice. Concerned that developers will be held to ransom and that the approach does not give any certainty as to which sites will come forward.	16.4 Accepted – see response and change proposed at 11.4 above.
	6.4.3	16.5 The provision of a variable percentage of affordable housing based on economic carrying capacity provides no certainty or guidance to developers and will slow down the provision of affordable housing. It implies that affordable housing is more important than other forms of planning obligation.	16.5 Accepted – see response and change proposed at 6.6 above.
	9.2.2 and 9.2.3	16.6 Exclusion of one bedroom houses is contrary to the aims of PPS3 to create balanced and mixed communities. Do not consider that a prescriptive mix should be applied to all sites within the District.	16.6 Partially accepted – see response and change proposed at 7.11 above.
	9.3.1	16.7 Object to the requirement for 50% Lifetime homes. This is covered by alternative legislation and is beyond the scope of planning policy.	16.7 Not accepted – see response at 7.16 above.
	9.3.2	16.8 No indication has been given as to how the minimum garden space standards have been derived. Further justification is required.	16.8 Partially accepted – A change is proposed so that the standards are indicative rather than fixed requirements.

	<p>9.4.2</p> <p>10.2.3</p> <p>Appendix 5</p> <p>Appendix 7</p>	<p>16.9 A 75%/25% tenure split in favour of social rented restricts the opportunities of people to get a foot on the property ladder. The split should be weighted in favour of shared ownership.</p> <p>16.10 The application of the Code for Sustainable Homes is controlled by other legislation and should not be addressed in this guidance. This conflicts with forthcoming building regulations.</p> <p>16.11 Replicates guidance that should be in the SCI. Object to the requirement to submit a residual land value calculation.</p> <p>16.12 – as this is SPD rather than new policy the submission of residual land value calculations should not be expressed as a 'requirement'.</p> <p>16.13 Item 7 – a single calculation should be utilised.</p> <p>16.14 Item 8 – it is unreasonable for the Council to employ an open book approach to all developments. A single target for</p>	<p>16.9 Not accepted – the tenure split reflects the needs identified by the Joint Housing Assessment.</p> <p>16.10 Not accepted – see responses 11.12 and 13.6 above.</p> <p>16.11 Comment noted – changes are proposed which should address this concern.</p> <p>16.12 Comment noted – changes are proposed which should address this concern.</p> <p>16.13 Not accepted - The objective of RLV methodology is to help inform the decision-making process for all parties in an objective manner. The assumptions underpinning RLV calculations sometimes unavoidably involve subjective judgements, and for this reason it is helpful to undertake modelling work based on alternative scenarios.</p> <p>16.14 Comment noted – changes are proposed which should address this concern.</p>
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		affordable housing should be employed.	
Barton Willmore on behalf of St Modwen Developments Ltd Redrow Homes	2.7 – Housing Delivery	17.1 Shortage of affordable housing is a direct result of the moratorium. Increasing the supply of housing land will increase the supply of affordable housing as acknowledged by the government. Para 2.7.6 demonstrates that 74.9% of affordable homes were provided by developers.	17.1 Not accepted – see response at 16.1 above.
	6.4 Increasing the yield of affordable housing	17.2 The variable percentage approach appears difficult to apply. A fixed percentage applied to all sites would be a better approach.	17.2 Accepted – see change proposed at 6.6 above.
	8.3 Funding affordable housing	17.3 Para 8.3.11 - it is beyond the remit of the Council to give guidance in respect of Option to Purchase or Purchase agreements. This para should be deleted.	17.3 Not accepted – the guidance is intended to be helpful.
		17.4 Para 8.4.9 - Monies received for affordable housing should be spent within 5 years not 7.	17.4 Not accepted. The period proposed reflects the practical issues discussed at section 2 of Appendix 8. Delivery of affordable homes using financial contributions has proved problematic for the Housing Service.
	9.2 Market Housing – Optimum Stock Mix and Integration	17.5 The exclusion of studio and one bedroom properties runs counter to the objectives of PPS3. It is inappropriate to include a prescriptive mix of properties within the document.	17.5 Partially accepted – see response and change proposed at 7.11 above.
	10.2 Code for Sustainable	17.6 The code is within the scope of other legislation and should not be repeated in	17.6 Not accepted – see response at 11.12 and 13.6 above.

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	Homes	SPD.	
Redrow Homes Midlands Ltd	<p>National and Regional policy position</p> <p>SPD Aims and Objectives</p> <p>Local Housing Needs</p>	<p>18.1 The representation includes a commentary on national and regional policy concerning housing land supply. It concludes that the Council should be pressing strongly for an increase in the level of housing provision in the submitted RSS review to reflect the scale of housing need and demand.</p> <p>18.2 Support the aims and objectives of the SPD but consider that it does not meet the requirements of PPS3 or the conclusions of the Barker Review. It does not respond to recommendation of the Affordable Rural Housing Commission or assisting in meeting the objectives of the Housing Green Paper.</p> <p>18.3 Para 1.6.2 and 1.6.3 seek to boost affordable housing at the expense of developers and landowners. There are no measures to boost housing provision generally which would in turn increase affordable housing.</p> <p>18.4 Para 2.2 the Housing Assessment has focussed almost entirely on affordable housing rather than housing across the whole market to meet all housing needs. Supply issues will continue to be the major determinant of price. The negative effects of low level housing provision have been to some extent self inflicted.</p>	<p>18.1 Comments are noted but fall outside the scope of the consultation on this SPD.</p> <p>18.2 Comments are noted, and a number of changes are proposed which should address some of these concerns. The more fundamental issues raised can only be addressed through the LDF Core Strategy.</p> <p>18.3 Comments noted – The SPD has to be prepared within the context of the development plan. It could not seek to increase housing provision per se beyond the strategic requirements set by the RSS.</p> <p>18.4 Not accepted – the Housing Assessment has looked at all housing and residential accommodation needs and demands, not just affordable housing. The levels of growth which would be required to have a significant impact on affordability are likely to be unsustainable in the context of the district.</p>





	<p>Affordable Housing Definition</p> <p>Function and location of affordable housing</p>	<p>18.18 Para 6.4.2 attempts to secure the maximum % of affordable housing based on the Council's view of viability. This is unlawful in using the planning system to tax the development value of land to penal limits. This policy should be deleted.</p> <p>18.19 Para 6.4.13 the use of CPO powers would appear unreasonable in situations where the Council has created restrictions which make development unviable.</p> <p>18.20 Para 7.1.2 the definition accords with PPS3, but two points should be considered: Firstly, the % requirement in the adopted Local Plan was derived from the old PPG3 definition which included low cost market housing. The proportion of affordable housing should be reduced to reflect the new definition. Secondly, the revised definition should not preclude local authorities from allowing low cost market housing. The restriction on housing for sale at 3.5 times income is unrealistic.</p> <p>18.21 Para 8.3.2 the aim to reduce land values is not the purpose of planning. The Council should play a positive role by increasing land supply.</p> <p>18.22 MHN.9 the approach of allowing only barely viable sites will reduce supply.</p>	<p>18.18 Accepted – see change proposed at 6.6 above.</p> <p>18.19 Not accepted – the use of CPO powers would only be used exceptionally.</p> <p>18.20 Not accepted – the % requirement is justified by the evidence of local need and is lower than that which is being sought and secured by other Local Planning Authorities within the South Housing Market Area. It is accepted that low cost market housing may have a role to play in delivering a balanced housing market, but it will not meet the needs for affordable housing which have been identified in the Housing Market Assessment.</p> <p>18.21 Not Accepted – it is important that the costs of development such as provision of affordable housing are reflected in land costs.</p> <p>18.22 Partially accepted – see response at 11.7 and the changes proposed to MHN9</p>
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	<p>Creating balanced communities</p> <p>Responding to climate change</p> <p>Conclusions</p>	<p>18.23 MHN12 Exclusion of studio and one bedroomed dwellings is contrary to the aim of creating balanced communities. Section (a) should be deleted.</p> <p>18.24 MHN13 requirements relating to 'Lifetime' standards and garden spaces will increase costs, further exacerbating affordability problems.</p> <p>18.25 para9.4.2 and MHN14 the target split between 75% social and 25% shared ownership should be deleted. The standardised housing mix in table 2 is too prescriptive and should be left to developers to determine.</p> <p>18.26 para10.2.2 and MHN16 requirement to meets Code level 3 is done without justification or the assessment of cost.</p> <p>18.27 The draft SPD is very disappointing in that it fails to address the shortage of housing and introduces an array of policies which will frustrate the delivery of housing.</p>	<p>18.23 Partially accepted – see response at 7.11 above and the changes proposed to MHN12</p> <p>18.24 Not accepted - As with other requirements of the SPD, the principle is that the additional costs involved should be met from reduced land values and hence not result in net additional costs to developers or purchasers.</p> <p>18.25 Not accepted – see responses at 11.10 and 15.22 above.</p> <p>18.26 Not accepted - The objective of MHN16 relates to the proposed DQS-based benchmark. As with other requirements of the SPD, the principle is that the additional costs involved should be met from reduced land values and hence not result in net additional costs to developers or purchasers.</p> <p>18.27 Disagree with conclusions and consider that a number of changes are proposed which address the fundamental concerns raised.</p>
GVA Grimley LLP on behalf of:	1. Introduction	19.1 Support the aims and objectives, but note that the imposition of the moratorium is	19.1 Comments noted

<p>Persimmon Homes (South Midlands) Ltd Charles Church South Midlands</p>	<p>MHN1 and Appendix 5</p> <p>Para 4.3.6</p> <p>MHN2</p> <p>MHN3</p>	<p>inconsistent with these.</p> <p>19.2 Concerned that: the policy is incapable of consistent / objective application community consultation may not be needed in all cases it is unclear what weight will be attached to the presence or absence of consultation it is unclear what weight will be attached to comments received, the approach focuses on process rather than achieving quality outcomes.</p> <p>19.3 One possible interpretation is that a landowner or developer may not profit from development. This is unlikely to support the delivery of housing.</p> <p>19.4 Do not see how the LPA can apply a preference to schemes which maximise the provision of affordable housing. Do not consider that this policy is capable of fair or consistent application.</p> <p>19.5 Concerned about how the maximum viable proportion will be determined. Presumably this will seek to limit the profit made by developers. . The policy should be expressed as an advocacy policy that seeks to negotiate as high a proportion of affordable housing as practical, having regard to an overall target, site specific, and other policy considerations. Calculating the</p>	<p>19.2 Not accepted – MHN1 should assist the delivery of new housing by ensuring that there is effective community engagement in the development and consideration of proposals.</p> <p>19.3 Accepted – see response at 15.5. above.</p> <p>.</p> <p>19.4 Accepted – see proposed change at 11.4 above.</p> <p>.</p> <p>19.5 Partially Accepted – see proposed change at 6.6 above. The situation with outline applications is not complicated by using floorspace to calculate the proportion, as the same issue arises in respect of dwelling numbers which are not usually specified at outline stage. Further guidance will be included</p>
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	MHN9	<p>proportion of affordable housing by reference to floor area appears problematic when applied to outline applications.</p> <p>19.6 Concerned about the requirement to submit a development appraisal to demonstrate that the proportion of affordable housing has been maximised.</p>	<p>in Appendix 8.</p> <p>19.6 Partially accepted – see proposed change at 11.7 above.</p>
CSJ Brooke Smith on behalf of various clients	<p>Conformity with Regulations</p> <p>Introduction and Local Housing Need</p>	<p>20.1 The Local Development Scheme indicates that this SPD was due to be adopted by July 2007 so there is a lack of conformity with the LDS. The policies of the SPD must be in conformity with national, regional and local polices. The context of existing policies is not sufficiently set out in Section1.3</p> <p>20.2 para1.1.1(7) – reducing the cost of housing land is not a spatial planning objective.</p> <p>20.3 The statement in para 1.5.4 and 1.4.2 appear to conflict and the weight which can be given to this SPD in decision making should be clarified.</p> <p>20.4 para 1.6.3 (3) – the intention to recycle increase in land values for community benefit conflicts with Circ 5/05 on Planning Obligations.</p> <p>20.5 para 3.1.3 – should acknowledge that 6</p>	<p>20.1 – The revision of the Local Development Scheme will address this issue. The SPD is in conformity with national, regional and local policies. A number of respondents have suggested that the SPD is too long and little would be gained by repeating national and regional policy in this section.</p> <p>20.2 Not accepted – This would have the benefit of making housing more affordable which is certainly a valid spatial planning objective</p> <p>20.3 Comments noted – that status of the SPD will be made clear in the adopted version.</p> <p>20.4 Partially accepted – see proposed change at 3.2 above.</p> <p>20.5 Accepted – this will be addressed by an</p>



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	<p>Effective Delivery and Implementation</p> <p>Improving Sustainability</p>	<p>20.13 MHN8 is imprecise and over restrictive</p> <p>20.14 Para 7.3.3 recommends the use of partner RSLs which is contrary to the spirit of PPS3 which seeks to widen involvement in affordable housing provision.</p> <p>20.15 Para 8.3 the suggestion of reducing land costs is unwarranted and beyond the scope of the SPD.</p> <p>20.16 MHN12 set out a prescriptive approach of the range of house types that will be acceptable. There is no policy basis to state that one bedroom dwellings will not be permitted. There is no evidence to justify pepper potting in management or social terms.</p> <p>20.17 MHN13 is a re-write of Policy COM.15 and introduces a new requirement for lifetime homes which should only be done through the LDF.</p> <p>20.18 Para 9.7.2 the text of MHN15 is unclear.</p>	<p>20.13 – Not accepted – see previous responses on MHN8.</p> <p>20.14 – Partially accepted – Whilst there are advantages in working with Partner RSLs, this particular paragraph is duplicatory. <b>It is therefore proposed that Para 7.3.3 be deleted.</b></p> <p>20.15 – Not accepted – it is important that development costs such as the provision of affordable housing are reflected in land costs.</p> <p>20.16 – Partially accepted – see change proposed at 7.11 above.</p> <p>20.17 – Not accepted – see previous response to MHN 13 and the change proposed at 7.16 above.</p> <p>20.18 – Not accepted.</p>
Barton Willmore on behalf of Helical Bar	Boosting Housing Supply	21.1 Support text to MHN 1 should recognise that it is not always possible to engage the local community e.g. if they decline to be	21.1 – Comments noted – the Planning Authority would take such matters into account, but it is not necessary to add

	<p>Maximising the Supply of Affordable Housing</p> <p>Effective Delivery and Implementation</p>	<p>involved. It is not always possible to take these views into account e.g. if they are unreasonable or conflict with policy.</p> <p>21.2 Para 4.3.6 recycling financial benefits of increased land values conflicts with circular 5/05. The Planning System is not a taxation system.</p> <p>21.3 MHN3 a comprehensive review of the proportion of affordable housing should await the LDF process and the 'maximum viable proportion' should be dropped. A residual land valuation would only be needed where the applicant cannot deliver 35% affordable housing on viability grounds.</p> <p>21.4 The parity approach which the Council seeks to apply to off site contributions is considered to be unlawful.</p> <p>21.5 MHN4 goes beyond the scope of Policy COM13 by requiring sheltered or 'extra care' housing to provide affordable housing. This conflict with the appeal decision relating to the extra care scheme at Tiddington Fields.</p> <p>21.6 MHN8 regarding benchmarks does not add to the SPD and wastefully duplicates work. It is unreasonable to require housing associations to be identified at pre application stage to ensure that quality benchmarks are satisfied.</p>	<p>additional text to the SPD.</p> <p>21.2 – Accepted – see proposed change at 15.5 above.</p> <p>21.3 – Partially accepted – see proposed change at 6.6 above</p> <p>21.4 Not accepted - The justification for this approach is set out at 6.1 in Appendix 8.</p> <p>21.5 Not accepted – see response at 7.5 above</p> <p>21.6 Not accepted – see previous responses to MHN8</p>
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	<p>Funding and Location of Affordable Housing</p> <p>Improving sustainability</p>	<p>21.7 MHN9 the requirement to submit a financial appraisal and residual land value calculation should only apply on sites where less than 35% affordable housing is offered.</p> <p>21.8 MHN11 – it may not be possible to agree all the details regarding off site provision of affordable housing at pre-application stage. The policy should be amended so this information is agreed prior to the granting of permission rather than the submission of the application.</p> <p>21.9 MHN12 – the restriction on studio and one bed dwellings is not considered to be flexible and will not promote the creation of balanced communities.</p> <p>21.10 MHN13 – guidance on garden sizes is supported in principle, but may need to be reviewed on a site by site basis.</p> <p>21.11 Appendix 5 and 7 – the list of information required should normally be dealt with by a Design and Access Statement. The residual Land Value Calculation is only required where a scheme offers less than 35% affordable housing.</p> <p>21.12 Appendix 8 – the parity rule for off site contributions is unlawful and should be deleted.</p>	<p>21.7 Accepted – see the change proposed at 11.7 above.</p> <p>21.8 Not accepted - If this is the case, then this itself may indicate that a proposal involving off-site provision is premature. The change requested is likely to be impractical, given national targets for decision-making times on planning applications.</p> <p>21.9 Accepted – see change proposed at 7.11 above.</p> <p>21.10 Comments noted – see change proposed at 15.10 above.</p> <p>21.11 Comments noted – The Council will ensure consistency between the provisions of this SPD and the requirements for Design and Access Statements.</p> <p>21.12 Not accepted - The justification for this approach is set out at 6.1 in Appendix 8.</p>
RPS on behalf of	General	22.1 SPD promotes new housing policy which	22.1 Not accepted – the SPD provides

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<p>Follett Property Holdings Ltd</p>		<p>is beyond its scope.</p> <p>22.2 The SPD ignores market housing and is really about affordable housing only.</p> <p>22.3 It fails to take account of the West Midlands RSS Phase II Review and the Housing Green Paper</p> <p>22.4 The draft SPD is premature and lacks a robust evidence base.</p> <p>22.5 The onus should be on preparing a new Development Plan Document reflecting latest government and regional policy rather than pursuing this SPD.</p> <p>22.6 The Council should not set new targets until a Strategic Housing Market Assessment has been undertaken.</p> <p>22.7 Second sentence insert 'may' after 'These'. Delete final sentence.</p> <p>22.8 RSS Phase II preferred option should be referred to.</p>	<p>interpretation and guidance on the application of existing adopted Local Plan policies. In doing so it has sought to take account of changes in national policy and new evidence such as the Joint Housing Assessment.</p> <p>22.2 Not accepted - Para 1.1.1 is clear on this point.</p> <p>22.3 Not accepted – the provisions of these documents will be fully assessed in the LDF Core Strategy.</p> <p>22.4 Not accepted – see response at 2.1 above.</p> <p>22.5 Not accepted – the LDF Core Strategy is being prepared, but this SPD will provide valuable guidance in the interim.</p> <p>22.6 Not accepted - a Strategic Housing Market Assessment has been undertaken.</p> <p>22.7 Not accepted – the statements are fully justified having regard to the Council's experience of Local Housing Needs Surveys.</p> <p>22.8 Accepted – this will be updated in the adopted SPD.</p>
	1.5.1		
	2.1.1		
	2.4.1		
	2.6.1		

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2.7.4	22.9 Council is not in a position to suggest any means for addressing unmet local needs.	22.9 Not accepted
3.2.2	22.10 Council should review the SPD in the light of the RSS Preferred Option.	22.10 Not accepted – the limited status of the preferred option doesn't merit a review of the SPD.
4.1.3	22.11 The Council's stated support for a 'bottom up' approach to planning is not in line with government policy in PPS3.	22.11 Not accepted – see response at 18.9 above.
4.2	22.12 The Local Choice SPD allows other sources of evidence to be considered when a Parish Plan is out of date or does not exist. This should be reflected here.	22.12 Comments noted – but the provisions of the Local Choice SPD are not superseded by this SPD and as such the additional wording is unnecessary.
4.3.2	22.13 This is inconsistent with policy COM.1 and places too much reliance on third party representations rather than planning considerations.	22.13 Not accepted – MHN1 is consistent with policy COM.1
4.3.5	22.14 Should not restrict freedom of choice by restricting 'buy to let' or second homes.	22.14 Accepted – see response at 15.4 above.
4.3.6	22.15 There is no justification for requiring net financial benefits of any increase in land values being recycled for the benefit of local communities.	22.15 Accepted – see response at 15.5 above
5.2	22.16 Rural Housing Enabler assessment cannot deal with balancing housing markets	22.16 Comment noted.
5.3	22.17 References to other sources of evidence should be included.	22.17 Comments noted – but the provisions of the Local Choice SPD are not superseded by

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			this SPD and as such the additional wording is unnecessary.
	5.4.2	22.18 Local Choice SPD allows other parties to submit evidence.	22.18 Comments noted – but the provisions of the Local Choice SPD are not superseded by this SPD and as such the additional wording is unnecessary.
	6.4.3	22.19 Without credible evidence base the Council cannot dictate the levels of affordable housing provision. This should stay at 35%.	22.19 The Joint Housing Assessment provides a credible evidence base.
	7.1.2	22.20 Policy should refer to housing for social rent and intermediate housing. Second part of the policy should be revised to acknowledge that intermediate housing may be rented above social rents. Should be cross-reference to the Local Choice SPD.	22.20 Not accepted – see response at 15.14 above. Not clear why a cross-reference to the Local Choice SPD is needed here.
	8.2.2	22.21 The approach relies heavily on local communities identifying sites, it is unclear how this meets the requirements of PPS3 paras 53-55.	22.21 Not accepted – the local choice approach is only one of the mechanisms for delivery referred. There is also a commitment to increase affordable housing as a proportion of total supply.
	9.2.2	22.22 Section 4 of MHN12 needs to reflect the guidance in the Local Choice SPD.	22.22 Partially accepted – this will be addressed in the explanatory text to deal with circumstances where no Parish Plan exists.
	9.3.2	22.23 Requirements for minimum garden sizes conflicts with PPS1 and By Design.	22.23 Partially accepted – see change proposed at 15.20 above.
	9.4.2	22.24 Item 2 needs to be consistent with the Local Choice SPD.	22.24 Accepted – an appropriate cross reference to the Local Choice SPD will be

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	Appendix 5 section 2.3	22.25 A 6-8 week period of public consultation is excessive. 3 weeks would be sufficient.	included. 22.25 Not accepted – 6 weeks is a nationally accepted standard for public consultation.
Bidford-on-Avon Parish Council	General	23.1 The Parish Council is pleased to see policies moving in this direction and the policies proposed to achieve a greater proportion of affordable housing appear fit for purpose.	23.1 Support noted and welcome.
	5.2.3 and 5.3.2	23.2 Lessons need to be learnt from the recent proposals for the redevelopment of the market at Henley-in-Arden.	23.2 Comments noted.
	Local Choice	23.3 Support these paras as best practice.	23.3 Support noted and welcome.
		23.4 Para 5.4 – support as a way of achieving more affordable housing.	23.4 Support noted and welcome.
		23.5 Welcomes para 6.3.1 and the policy at 6.3.2 and agrees with the conclusion at 6.4.3	23.5 Support noted and welcome.
	Part 3 Definitions, Standards and Funding	23.6 Prior local consultation is imperative before any decision to reduce the overall proportion of affordable housing (para 8.3.4(1)(iii) is taken.	23.6 Comments noted.
	Part 4	23.7 Warmly welcomes the proposals.	23.7 Support noted and welcome.
	General	23.8 The Parish Council is concerned that the District Council may not have the political will to make a success of the policy.	23.8 Comments noted.



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		24.9 Para 10.2.3 requirement to achieve Code level 3 is too onerous.	<p>themselves should not be so large as to frustrate principle of pepperpotting. This is a design issue in the first instance, so it is important to flag up this issue at an early stage.</p> <p>24.9 Not accepted – see response at 11.12 and 13.6 above.</p>
Steve Taylor SET Design	General	25.1 Further land could be released for affordable housing if development on the edge of towns and villages rather than restricting this to built-up area boundaries drawn up 20 years ago. Rather than seeking affordable housing on smaller sites policies should allow slightly larger sites in rural areas to come forward.	25.1 Comments noted -This is a matter for the Core Strategy DPD.

The following responded to the consultation but did not make specific comments:

- South West Regional Assembly
- South East Regional Assembly
- Highways Agency
- British Waterways
- English Heritage
- The Theatres Trust
- East Midlands Regional Assembly
- Warwickshire Wildlife Trust



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