

Affordable Housing SPD:

Comment Reference	Respondent	Page/Para Reference	Consultation Response	Officer Summary	Proposed Change to SPD
AH1	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	General	Supplementary Planning Documents (SPDs) provide an ideal opportunity for the LPA to explain the role of Housing Associations in the delivery of affordable housing. As a whole, the SPD should include a wider discussion of roles that other bodies such as Housing Associations and Registered Providers have in delivering the housing needs of the area.	The role of preferred registered providers is outlined in Section 8 of this SPD.	No Change.
AH2	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	General	In recent times of reduced financial support HAPC members have become closely involved in the direct delivery of new affordable housing. HAPC members are also seeking to explore the many models of affordable housing delivery that are set out in Annex 2 of the NPPF. Moreover, we would like to encourage opportunities for the joint commissioning of affordable housing delivery between the Council and HAPC members.	Noted. The Council's approach to developing affordable housing is beyond the scope of this SPD. Coventry City Council's Housing Department will be notified of this point.	No Change.
AH3	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	General	Whilst reference to the updated NPPF 2021 is welcomed, it is suggested the Council refrain from reproducing national policy text. This will help to ensure the longevity and consistency with a changing national policy context in years to come. As an example, Paragraph 2.4 reproduces national policy with regard to affordable housing, instead it would be more appropriate to direct readers to Annex 2 of the NPPF 2021.	Noted, this reflects the text at the time the SPD was produced, which therefore sets the context for the SPD and it is felt that reproducing the text is helpful in this regard. If the NPPF and guidance changes the case officer will be aware of this and take it into account.	No Change.
AH4	Tetlow King Planning (On behalf of the West Midlands Combined Authority)	Paragraph 2.6	It is also noted Paragraph 2.6 in reference to the West Midlands Combined Authority definition of affordable housing refers to the NPPF 2019. As the Council is aware,	Noted, the SPD will be updated accordingly.	Paragraph 2.6 updated to

	Midlands Housing Association Planning Consortium)		the latest revision of the NPPF dates 20 July 2021. We therefore recommend that reference to the NPPF 2019 be updated to the most recent version.		reference NPPF 2021.
AH5	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 2.6	<p>Further, the wording of Paragraph 2.6 conflates two separate issues:</p> <p><i>“The Combined Authority’s definition of affordable housing goes beyond the statutory definition as referenced in the NPPF by stating that to be truly affordable, residents should not pay more than 35% of their income towards their monthly rent or mortgage. This establishes a greater discount of 15% when made against the definition referenced in the NPPF 2019, which asserts that a 20% discount from the prevailing rate as an affordable rate”.</i></p> <p>The Combined Authority definition of affordable housing relates to the proportion of income that is spent towards their monthly income or mortgage. This is a different context to the NPPFs definition of affordable housing that quotes affordable housing must be 20% below market value or rents. These are two issues of separate intent and context, clear differentiation is needed.</p>	Paragraph 2.6 outlines the difference between the Combined Authority’s definition of affordable housing and that outlined by National Policy. Para 2.7 amended to make clear the issue about intent and context.	Amended para 2.7 to clarify the difference with intent and context.
AH6	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 2.11	Paragraph 2.11 notes at time of adoption of the local plan (2017) a shortfall of 1,150 of affordable homes was identified. The HAPC members are well placed and keen to boost the supply of affordable homes in the City. The Council’s commitment to produce Authority Monitoring reports is welcome to ensure that the annual target of 348 dwellings is achieved.	Noted.	No Change.

AH7	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	General – with regard to tenure types	<p>Whilst a prescribed tenure mix can be helpful to ensure the delivery of a range of tenure types, it is hoped that the Coventry City Council will take a pragmatic approach to the application of the policy requirements having regard to site characteristics and housing market conditions.</p> <p>We hope that the City Council will continue to support shared ownership as an affordable home ownership tenure as it provides an invaluable role in assisting home ownership and enabling households to join the housing market with small deposits. Shared Ownership is flexible and well established affordable homeownership product that enables staircasing up to full ownership.</p>	Noted. The Council’s support for shared ownership is made clear in the table underneath Paragraph 4.3, Intermediate Provision.	No Change.
AH8	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 5.2	Section 5 refers to the expected design standards of both market and affordable housing. In particular, Paragraph 5.2 sets out relevant design considerations for creating the ‘highest level of residential amenity’. Our HAPC members seek to deliver high-quality, well-designed schemes that contribute to placemaking of local communities.	Noted.	No Change.
AH9	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 5.10	Paragraph 5.10 elaborates on Part 7 of Policy H6: Affordable Housing, suggesting the identification of housing size and typology through dialogue “with various interested parties to achieve the most appropriate and affordable housing type”. The HAPC is grateful for the recognition of dialogue in aiding the delivery of affordable housing. Such dialogue allows for flexibility in house size and typologies to meet the latest housing needs in specific localities across the area whilst also improving the viability of projects coming forward.	This SPD cannot set spatial standards as this is beyond the scope of the SPD. Moreover, the Registered Providers Forum (Run by the City Council’s housing department) provides a mechanism for such discussions to be had	No Change.

			<p>However, with this recognition we would like to remind the Council that communication and dialogue with Housing Associations as an 'interested party' will aid in securing the delivery of affordable housing. There have been circumstances where no Housing Associations have taken up the affordable units as they are too small, making them inappropriate. Further dialogue and consultation with housing associations during the planning application process would help avoid these issues.</p>		
AH10	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 5.14	<p>We are pleased to see that paragraph refers to 'realistic management practices' and recognises the need to minimise costs and retain affordability in perpetuity. It is helpful that Council is open about tenure integration and has not set a prescriptive limit on affordable housing clusters. However, if the Council were minded to include a limit we would suggest clusters up to 15 units should be permitted. We also note the Council support for Advanced Methods of Construction (AMC). Our members are keen to promote energy efficient construction where possible as part of the zero carbon agenda.</p>	Comments noted. However any creation of new policy is beyond the scope of this SPD.	No Change.
AH11	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 8.11	<p>We are also pleased that the SPD recognises the critical role of Housing Association in the delivery of new affordable homes and the HAPC members are included as Preferred Registered Providers listed in paragraph 8.3. The HAPC is pleased to see that the SPD recognises the potential of delivering affordable housing through community groups as noted in Paragraphs 8.5 to 8.7. Many HAPC housing associations have successfully</p>	Noted, the SPD will be updated accordingly.	Paragraph 8.11 to be updated to reference First Homes.

			delivered AH with Community Land Trusts in recent years. Paragraph 8.11, references “starter homes”. Although this is still referenced in the NPPF Annex 2 definition of Affordable Housing, it has been superseded by the introduction of “First Homes” in June 2021 and should be removed. Reference should only be made to “First Homes” as is the case elsewhere in the SPD.		
AH12	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 8.14	Further, Paragraph 8.14 gives the impression that all affordable housing units provided in Coventry are to be retained in ‘perpetuity’ (i.e. retained as affordable housing tenure forever). The NPPF only requires affordable housing to be secured in ‘perpetuity’ on Rural Exception Sites. Securing affordable housing in this manner can be problematic for affordable housing providers and purchasers when attempting to secure mortgages for properties that are restricted in such a manner. To ensure consistency with national policy and allow for fair implementation of the SPD the Council should remove reference to securing affordable housing in ‘perpetuity’ unless it is made clear that it relates directly to Rural Exception Sites only.	The retention of Affordable Housing in perpetuity ensures access to affordable housing remains viable for the City’s residents in the future, and that private sales do not benefit from Section 106 provisions. The NPPF does not preclude the retention of Affordable Housing in perpetuity and the principle is well established. Indeed, if the definition of affordable housing is reviewed in Annex 2 the Glossary to the NPPF July 2021, paragraph A refers to affordable housing for rent, paragraph C discounted market housing and D other affordable routes to home ownership; each of these paragraphs refers to future eligible households. We therefore do not propose any change to the paragraph.	No Change.
AH13	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Paragraph 8.15	We understand the intent of paragraph 8.15 in seeking to ensure that affordable housing stock losses are kept to a minimum, but the reality is there will be inevitable stock losses through the Right to Acquire and in some estate regeneration schemes. The Council need to mindful that affordable housing can only be secured in perpetuity on Rural Exception Sites and otherwise	We disagree that estate regeneration automatically necessitates the loss of affordable housing – and such losses will need to be justified by the applicant and be reviewed on a case-by-case basis.	No Change.

			registered providers are permitted to sell their stock without restraint.		
AH14	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Appendix 2 – 2.2.3	We are pleased to see that the SPD provides an AH Section 106 Agreement wording template. This will assist and simplify the preparation of planning obligations. We are also pleased to note that our HAPC members are included as Preferred Registered Providers. However, it is important to highlight the fact that only two of the six Registered Providers are suggested. It is recommended that all listed Registered Providers be included. All Registered Providers should be approached before the developer concludes they aren't able to sell to a Registered Provider.	We do not believe it is practicable to require developers to receive the refusals outlined in the referenced para from all the listed Registered Providers. However, in order to ensure that a wide range of providers are engaged that number will be increased from two to four.	Change reference from two Registered Providers to four.
AH15	Tetlow King Planning (On behalf of the West Midlands Housing Association Planning Consortium)	Appendix 2	Furthermore, we request that all Registered Providers put forward on Pages 38-39 be included on the same page. This will remove any visual bias and opportunity for exclusion.	Noted, but the providers are introduced in Chapter 8, all on the same page.	No Change.
AH16	Natural England		No comments to make on the AH SPD	Noted.	No Change.
AH17	Coventry Society	General	The Coventry Society welcomes the document's: <ul style="list-style-type: none"> • emphasis on ensuring that there is a mix, and choice, of tenures across the city rather than particular types of tenancy being concentrated in certain areas, and that the different types of tenancy should be integrated into new developments. • links with the aspirations and objectives of the Council's Housing and Homeless Strategy 2014 	Noted, however, this SPD is intended to provide clarity and certainty for the delivery of affordable homes within the context set by national planning policy.	No Change.

			<p>and the Strategic Housing Market Assessment 2015 (but note comment on the latter below).</p> <ul style="list-style-type: none"> • concern with meeting residents’ need and with build quality, including energy efficiency, environmental friendliness and internal living space requirements. • recognition of advanced methods of construction. • acknowledgement of non-traditional forms of provision such as co-living, self-build and community-led housing (but note comment below). <p>We do, however, have a number of reservations and criticisms of the document and its shortcomings, particularly in the light of the alarming statistic that in four years only half the target number of affordable homes in the plan have ‘benefited from planning permission, were being constructed or had been delivered’. This is a shocking situation, which we are not at all convinced will be remedied by the measures outlined in the document, given its generally complacent, unimaginative, ‘business as usual’, ‘more of the same’ approach.</p>		
AH18	Coventry Society	General	<p>We are concerned that the viability argument – often highly questionable or entirely spurious - will continue to lead to the City Council being outmanoeuvred in its negotiations with developers. The example of City Centre South, with, thus far, its total absence of affordable housing, vividly illustrates the point. We would like to see this ‘get-out’ tightened up considerably and subject to much greater transparency.</p>	<p>Noted, however, this SPD is intended to provide clarity and certainty for the delivery of affordable homes within the context set by national planning policy. Viability testing can be considered as part of this process.</p> <p>NPPF para 58 states: “It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability</p>	No Change.

				assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.”	
AH19	Coventry Society	Validity of SHMA	<p>We are aware that there has been considerable recent public debate about the validity of the SHMA. The Society shares some of the doubts that have been raised about it, including the significance of social, economic and demographic changes such as:</p> <ul style="list-style-type: none"> • the failure of the exceptionally large population growth, which was assumed when the plan was drawn up, to materialise; • a growth in the student population and the concomitant expansion of bespoke student accommodation with its associated effects on land cost and availability, pressure on local services and amenities, etc; • a growth in Coventry’s migrant populations, with their specific needs; • a growing realisation of the ramifications of an ageing population, whose needs should be reflected in the delivery of new housing, a point emphasised in the recent white paper 	The SPD elaborates on adopted policy, however the SHMA is being updated in terms of a new sub-regional Housing and Economic Development Needs Assessment (HEDNA) and this will be used to inform any future Local Plan work.	No Change.

			<p>People at the Heart of Care: adult social care reform, itself arguably underplaying the consequences of an ageing population on housing delivery (see for example https://housingevidence.ac.uk/housing-and-the-social-care-white-paper-a-credibility-gap/).</p> <ul style="list-style-type: none"> The effects of the Covid-19 pandemic, including the growth of 'working at home'. 		
AH20	Coventry Society	General	We are surprised that, despite recognising that non-traditional forms of provision such as co-living, self-build and community-led housing have a part to play, co-living has been so thoroughly dismissed in the document, for reasons that we find flimsy and unconvincing.	As detailed in para 5.20, off-site affordable housing contributions will be required in the form of a commuted sum.	No change.
AH21	Coventry Society	General	Given the continued sluggish delivery of affordable housing we are also surprised that the City Council proposes to continue with the same restricted list of rather samey Registered Providers. Our overall verdict on the guidance is that it presents laudable aims and objectives but leaves us with serious doubts that its implementation will give the desired results. If that proves to be the case it will have failed the people of Coventry.	Paragraph 8.4 outlines a mechanism for engagement with alternative providers. The document is intended to provide clarity and will assist delivery within the scope of what an SPD can achieve as supplementary policy.	No Change.
AH22	Coventry Society	General	[Suggest that] The emerging and changing needs (and numbers) of Coventry's population are monitored closely and reflected in flexible and regularly reviewed planning guidance.	Noted. The evidence base for this is being updated.	No Change.
AH23	Coventry Society	General	[Suggest that] The provision of affordable housing is opened up to a much wider set of providers, to	Noted. Paragraph 8.4 of this SPD outlines how Alternative Providers may be involved	No Change.

			encourage innovation, competition and an increase in the number of delivery channels. New providers should be encouraged, not just because of the additional homes they will provide but because their schemes will be exemplars and challengers to the existing players. This should include community organisations and charities, in partnership with registered providers where appropriate. Starley Housing Co-operative, which partners with Greensquare Accord, is a good example of what can be achieved. So is Earlsdon Park Village, which is also an exemplar of how housing and social care can be brought together.	in the delivery of affordable housing in Coventry. This is Council policy, comments will be conveyed to those departments involved.	
AH24	Coventry Society	General	[Suggest that] These new challenger providers should include the City Council itself. Throughout the UK, local authorities in a similar position to Coventry's – a shortfall in the delivery of housing, in particular affordable housing, by traditional developers – have found ways to enter the field themselves. See for example https://www.theguardian.com/cities/2019/oct/28/meet-the-councils-quietly-building-a-housing-revolution and https://www.rtpi.org.uk/research/2017/june/local-authority-direct-provision-of-housing-i/	The Council's Policy on the development of new affordable homes is beyond the scope of this SPD. Comments will be conveyed to those involved.	No Change.
AH25	Coventry Society	General	[Suggest that] The viability regime for developers is toughened up. It is clear that developers are too quick to reach for this escape route in the cause of profit maximisation and scheme simplification. It is too easy for developers to negotiate their way out of their social obligations with the help of high-powered consultants. The replacement options – section 106 agreements, the	Noted, however, this SPD is intended to provide clarity and certainty for the delivery of affordable homes within the context set by national planning policy. Viability testing can be considered as part of this process. NPPF 58 "It is up to the applicant to demonstrate whether particular	No Change.

			provision of affordable housing on another site, the payment of a commuted sum – are often inadequate.	<i>circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.”</i>	
AH26	Coventry Society	General	[Suggest that] Non-traditional forms of provision are actively encouraged, including by the creation of a support and advice function within the City Council.	Noted, this suggestion has been passed onto Colleagues in the housing department who are responsible for such matters.	No Change.
AH27	Savills (on behalf of their unnamed clients)	4.3	<p>The table at 4.3 incorrectly applies the NPPF policy for affordable private rent. The table in the draft SPD states that affordable rental homes are made available at least 80% discount on market price. The requirement is the inverse, being at least 20% discount on market rent. The table at 4.3 needs to be corrected accordingly.</p> <p>The table at 4.3 also needs to state that affordable private rent can be 100% of the tenure mix requirement of the affordable component (up to 25% of overall provision) regardless of the Concentration Area category. The table at 4.3 needs to be corrected accordingly.</p>	<p>The discount rate for affordable private rent is to be corrected to the figure of 20%.</p> <p>BtR Planning Guidance https://www.gov.uk/guidance/build-to-rent sets out that BtR developments are to deliver their affordable housing as affordable private rent which does not have to be managed by a registered provider.</p>	Table 4.3 updated to show the correct figure.

AH28	Savills (on behalf of their unnamed clients)	5.18 – 5.19	<p>The support for co-living housing at 5.18 is welcomed as it acknowledges the important role co-living accommodation can play in meeting the housing needs of the city. We disagree however, that co-living developments are not suitable to provide on-site affordable units as stated at 5.19. The national policy set out above makes clear that on-site provision of discounted rental accommodation by the private owner of the build to rent accommodation is the expected norm. This applies to co-living accommodation equally as to other forms of build to rent. 5.19 should be corrected to bring it into line with NPPF and PPG policy.</p>	<p>Under para 19 a new para 20 to be introduced to provide further clarification to reflect national policy and guidance on BtR With regards to co-living, this is a different product meeting different needs and it is not seen how on site provision would be workable. Therefore commuted sums are deemed appropriate.</p>	<p>New para 20 to better reflect national policy and guidance on build to rent.</p>
AH29	Savills (on behalf of their unnamed clients)	5.20	<p>National policy also provides that the rent subsidy can be recycled for alternative affordable housing provision. The ability to provide a financial contribution for off-site provision in lieu of on-site provision with build to rent (including co-living) should continue to be included as an option as set out at 5.20.</p>	<p>Update the section to better reflect national policy and guidance.</p>	<p>New para 20 to better reflect national policy and guidance on build to rent.</p>
AH30	Savills (on behalf of their unnamed clients)	Part 7	<p>The calculation of the commuted sum, should not however be as set out in the formula at part 7, but should instead be equivalent to the rental discount that would otherwise be borne by the build to rent operator if the affordable provision was made on-site. This would reflect the 20% discount to market rent across the number of units that would be required to be provided.</p> <p>This suggested approach is fair and transparent, being equal in subsidy amount. Such an approach is also consistent with the definition set out at NPPF Annex 2. 5.20 and Part 7 should be amended to comply with the</p>	<p>Amend para 7.2 to make clear that this is an expectation of the council rather than a requirement.</p> <p>In line with PPG on BtR, any ‘clawback’ arrangement will be calculated in line with National Policy.</p> <p>Para 7.6 clearly states that applications will be considered on a case by case basis.</p>	<p>Amended para 7.2 to show this is an expectation of the council.</p>

			NPPF provision that alternative provision can be made with the rental subsidy.		
AH31	Savills (on behalf of their unnamed clients)	7.7	The approach proposed by the SPD at 7.7 where the Council will seek additional provision with off-site provision, is not in accordance with the NPPF. 7.7 should therefore be deleted.	The Council believes this approach is compliant with the NPPF.	No Change.
AH32	Savills (on behalf of Barratt)	2.5 – 2.7	Paragraphs 2.5 -2.7 of the SPD make reference to an affordable housing definition by the West Midlands Combined Authority ('WMCA') which states that to be truly affordable, residents should not have to pay more than 35% of their income in rent or a mortgage. Paragraph 2.7 acknowledges that the WMCA definition will not be given any planning weight nor is it a material consideration in the decision-making process. However, Coventry City Council ('CCC') will 'encourage' applicants to consider provision against this definition. Barratt supports no weight being given to WMCA's definition and CCC's approach to only 'encourage' compliance with this definition.	Noted.	No Change.
AH33	Savills (on behalf of Barratt)	Section 4	In order to reflect existing housing stock and avoid over-concentration of particular affordable housing tenures, Coventry has been split into areas of low, medium and high concentrations of social housing. New Century Park is located within an area defined by the SPD as 'medium concentration'. Policy H6 requires areas of medium concentration to make provision for 12.5% social / affordable rent and 12.5% intermediate provision. We consider that tenure split should be agreed on a site-by-site basis rather than a blanket requirement and based on any prevailing housing evidence available at the time of the application.	H6 is adopted policy. The table below 4.3 is intended to provide clarity to developers in addressing local need and reflecting local circumstance.	No Change.

AH34	Savills (on behalf of Barratt)	Section 4	<p>Policy H6 does not state how much of the 12.5% needs to be social or affordable rent so it is unclear whether these tenures need to be split equally or whether the split is agreed on a site-by-site basis. Further clarity is requested from CCC on this matter.</p>	<p>The proportion of Social and Affordable rent that is to be provided will be decided on a case-by-case basis, early consultation with Housing Colleagues is advised in relation to this.</p>	No Change.										
AH35	Savills (on behalf of Barratt)	5.9	<p>The table under Paragraph 5.9 (extract below) sets out a preferred affordable housing mix based on the SHMA 2015 and information provided by registered providers which has identified a rising need for family sized affordable housing. The paragraph states that the Council expects the affordable housing mix to accord with the below mix.</p> <table border="1" data-bbox="736 742 1420 817"> <thead> <tr> <th>Affordable</th> <th>1-Bed</th> <th>2-Bed</th> <th>3-Bed</th> <th>4-Bed</th> </tr> </thead> <tbody> <tr> <td></td> <td>20%</td> <td>30%</td> <td>30%</td> <td>20%</td> </tr> </tbody> </table> <p>Barratt do not support the above fixed mix. The PPG states that SPDs should build upon policies in a local plan but “they should not add unnecessarily to financial burdens on development” (Reference ID: 61-008-20190315). The SHMA 2015 provides a percentage range (shown on the table under Paragraph 5.5. of the SPD and below) which we consider provides more flexibility for developers. Paragraph 5.6 is considered to be more flexibly worded than paragraph 5.9 as it states, “the breakdown of needs provided by the SHMA should be the starting point for any discussion with the Council as to the delivery of an appropriate mix of affordable housing”. We consider that the table above should be removed from the SPD and only the SHMA table below should be included. Paragraph 5.9 should then be</p>	Affordable	1-Bed	2-Bed	3-Bed	4-Bed		20%	30%	30%	20%	<p>This section already provides flexibility (see 5.6) in negotiating the mix in a case-by-case basis. It has been written to ensure that current need is better reflected in this SPD.</p>	No Change.
Affordable	1-Bed	2-Bed	3-Bed	4-Bed											
	20%	30%	30%	20%											

			<p>reworded similarly to Paragraph 5.6 to state that the SHMA mix in the below table will be a starting point for discussions, but the final mix will be determined on a site-by-site basis based on market considerations and viability.</p> <table border="1"> <tr> <td>Affordable</td> <td>1-Bed</td> <td>2-Bed</td> <td>3-Bed</td> <td>4-Bed</td> </tr> <tr> <td></td> <td>20-25%</td> <td>30-35%</td> <td>25-30%</td> <td>15-20%</td> </tr> </table>	Affordable	1-Bed	2-Bed	3-Bed	4-Bed		20-25%	30-35%	25-30%	15-20%		
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AH36	Savills (on behalf of Barratt)	5.11	<p>Paragraph 5.11 of the SPD states that the Council promotes the use of Nationally Described Space Standards for affordable housing. The SPD goes on to state “through active dialogue with the Council and registered providers, it is considered that this can be realistically achieved”. When determining the need for internal space standards, the PPG states that evidence of need, impact on viability and transition period should be considered (Reference ID: 56-020-20150327). The Council has not provided any supporting evidence with the draft SPD to support this requirement. Until this evidence is provided to justify the internal space standards, we consider that it should be removed from the SPD.</p>	<p>This is not a requirement; it is a recommendation which aims to encourage the Nationally Described Space Standards (NDSS).</p>	No Change.										
AH37	Savills (on behalf of Barratt)	5.21-5.25	<p>Paragraphs 5.21 to 5.25 of the SPD refer to advanced methods of construction. Paragraph 5.25 states that the Council “will encourage proposals to deliver affordable homes via Advanced Methods of Construction, particularly in cases where it can overcome viability issues and contribute towards achieving high performing, energy-efficient homes”. In terms of delivery, Barratt does not support differing construction requirements for affordable housing. If the Council do pursue this requirement, then it should be applied</p>	<p>This is not a requirement; the recommendation demonstrates the council’s commitment to good practice including Advanced Methods of Construction.</p>	No Change.										

			equally to both affordable and market housing on a site and the Council should provide evidence to ensure that this requirement will not “add unnecessarily to financial burdens on development” (PPG Reference ID: 61-008-20190315).		
AH38	Birmingham Airport		*No comments to make in relation to the SPD*	Noted.	No Change.
AH39	Historic England		*No comment to make in relation to the SPD*	Noted.	No Change.
AH40	Resident – K Whitehead	General	<p>This document appears to have been written for developers so they can maximise their profits and not for Coventry residents.</p> <p>Coventry has a huge need for social housing which means people on benefits can get all of the rent paid for them. Affordable housing may include social housing but doesn't have to. The draft SPD appears to give developers a further option of "Alternative Contribution through an Alternative Location ".</p> <p>From the summary. "It also explains alternative scenarios where the provision of affordable housing is reduced or cannot be delivered at all as well as building and design requirements. It also attempts to simplify the Section 106 Agreement legal process by providing a wording and a template for developers to use. Through this, it is hoped that this SPD will enable more productive negotiations between the Council and applicants wishing to deliver homes in Coventry. This should help make planning applications faster and easier to decide. "</p>	This document has been produced in order to give clarity and certainty in order to maximise the delivery of affordable homes through a variety of channels in compliance with National Policy and Guidance.	No Change.

			Throughout the document there are further way for developers to avoid Council policies on affordable homes.		
AH41	Resident – K Whitehead	7.16	<p>“7.16 The Council will retain the commuted sums on deposit for a period of up to 5 years and if the sum is not used, the amounts will be repaid to the applicant, inclusive of interest.”</p> <p>A developer can build no affordable homes even though that is against Council policy. They do this by putting the right arguments to planning officers, pay the Council the "commuted sum" which if not used in 5 years is returned plus interest. Why should developers build any affordable homes in Coventry?</p> <p>This a document written for developers that when approved, completely ignores the desperate need for social in Coventry.</p> <p>New developments should have a minimum social housing (plus other affordable housing) without any get-out.</p>	This is not the intention; this document has been produced in order to give clarity and certainty in order to maximise the delivery of affordable homes through a variety of channels in compliance with National Policy and Guidance.	No Change.
AH42	Marrons Planning (on behalf on Rainer Developments)	4.4 - 4.5	Paragraph 4.4 of the Draft states that a minimum provision of affordable routes to home ownership are established in the NPPF of at least 10%. Paragraph 4.5 also makes reference to First Homes as an intermediate affordable product, and states that guidance stipulates that 25% of all affordable home provision on any given site must be First Homes.	Noted, the SPD will be updated accordingly.	Footnote outlining the exemptions as detailed in the NPPF added.

			<p>However, paragraph 65 of the Framework states that there are exemptions as to when affordable home ownership should be required on new developments and these are set out underneath paragraph 65. These include developments solely for build to rent homes.</p> <p>In order to provide clarity and consistency with the NPPF, it would be helpful for the final version of the SPD to recognise that intermediate housing is not required on all new developments and that there are exceptions as listed under paragraph 65.</p>		
AH43	Marrons Planning (on behalf on Rainer Developments)	7.7	<p>Finally, paragraph 7.7 onwards of the Draft seeks to apply a greater affordable housing requirement than that required by Policy H6 in circumstances where off site provision is agreed. Policy H6 is clear as to the level of affordable housing required (25%) whether it is on site or off site, and the SPD cannot be used to amend this policy. The Council should remove this section of the SPD as it goes beyond what is allowed for in the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>	The ratio (25%) of affordable housing that is required is maintained where off site provision is agreed, reflecting the uplift in the number of market dwellings that are developed in instances where off-site provision is agreed.	No Change.
AH44	National Highways		*Confirmed that had no comments to make*	Noted.	No Change.
AH45	Pegasus (on behalf of Persimmon Homes Central)	Executive Summary	The Executive Summary makes reference to Social Rent only however the SPD as a whole allows for both social and affordable rent, as does Policy H6 in the adopted Local Plan. The Executive Summary should be amended to refer to both social/affordable rent to avoid any confusion.	Noted, SPD to be updated accordingly to include reference to Affordable Rent.	Made suggested amendment to the wording of the executive summary.

AH46	Pegasus (on behalf of Persimmon Homes Central)	2.7 - onwards	The SPD continues that Coventry City Council (CCC will encourage applicants to consider provision against the WMCA definition, particularly were the WMCA has facilitated delivery of affordable housing through funding and land-release strategy. This is beyond the remit of the planning system and any agreements made between developers and the WMCA to deliver affordable housing is not for the planning system to consider or enforce.	Noted and agreed.	No Change.
AH47	Pegasus (on behalf of Persimmon Homes Central)	2.13	Paragraph 2.13 refers to the spatial element of the affordable housing policy set out in the Local Plan. The aim of this is to ensure that those residents in need of affordable accommodation, wherever their location in Coventry, can be housed in affordable housing. The overarching aspiration of this approach is supported as householders prefer to live close to existing support networks (family and friends) and employment. The SPD should acknowledge that if there are instances where there is no, or low, need for affordable housing in a specific locality a commuted sum will be accepted in order to provide alternative affordable housing in an alternative location with a higher need.	Affordable housing is a city-wide requirement, therefore affordable housing will be provided across the city in line with the Local Plan.	No Change.
AH48	Pegasus (on behalf of Persimmon Homes Central)	Chapter 4	Chapter 4 addresses tenure mix of affordable housing. The required tenure mix varies by area as established by Policy H6 in the adopted Local Plan. The SPD does not seek to alter the tenure mix as established in the Local Plan. This approach is supported and reflects the status of SPDs as material considerations rather than being part of the Development Plan, as the Local Plan is. This Chapter confirms that the 'intermediate' tenure relates to affordable home ownership and that the Government's First Homes initiative can make up the	The table under paragraph 4.3 provides clarification with regards to Intermediate Provision.	

			intermediate affordable provision. The SPD should confirm that intermediate provision includes shared equity. This is included on the draft S106 included at Appendix 2 but should also be referenced in the main text for the avoidance of doubt. This approach is supported and provides helpful clarification that First Homes can be included under the definition of 'intermediate' tenure.												
AH49	Pegasus (on behalf of Persimmon Homes Central)	4.7	The table included after paragraph 4.7 should also refer to affordable rent, as well as social rent. The table presented after paragraph 4.3 includes both social and affordable rent and this approach should be continued.	Noted, table headers at 4.7 to include reference to affordable rent.	Headers of the table below 4.7 updated.										
AH50	Pegasus (on behalf of Persimmon Homes Central)	Chapter 5	<p>At paragraph 5.9, the SPD sets out the preferred affordable mix, based on the SHMA but also makes reference to the city's Housing Register. This table is replicated below:</p> <table border="1" data-bbox="734 922 1417 997"> <thead> <tr> <th>Affordable</th> <th>1-Bed</th> <th>2-Bed</th> <th>3-Bed</th> <th>4-Bed</th> </tr> </thead> <tbody> <tr> <td></td> <td>20%</td> <td>30%</td> <td>30%</td> <td>20%</td> </tr> </tbody> </table> <p>The provision of a mix of affordable housing is supported but there are significant concerns regarding the above mix, particularly the large proportion of 4-bed dwellings. The SHMA was updated in 2015 but the original data was presented in the 2012 SHMA, which presents the proposed mix. This data, which will pre-date the publication of the SHMA, is clearly of some age and is now significantly out-of-date. This will need to be updated through the forthcoming Local Plan Review.</p>	Affordable	1-Bed	2-Bed	3-Bed	4-Bed		20%	30%	30%	20%	Noted, the evidence base (HEDNA) is currently being updated.	No Change.
Affordable	1-Bed	2-Bed	3-Bed	4-Bed											
	20%	30%	30%	20%											

	Pegasus (on behalf of Persimmon Homes Central)	Chapter 5	It should also be noted that the SHMA does not distinguish between different tenures within affordable housing, which often have different mix requirements. For example, for 'intermediate' tenure such as First Homes, two-and three-bedroom dwellings are more popular for first-time buyers as opposed to one-or four-bedroom dwellings. The above mix does not reflect this difference. It is suggested that the future SHMA should look at providing a different mix for the various affordable housing tenures to account for this and that this exercise should be done through the Local Plan Review, rather than an SPD.	Noted, the evidence base (HEDNA) is currently being updated.	No Change.
AH51	Pegasus (on behalf of Persimmon Homes Central)	Chapter 5	The bedroom tax means that claimants receive less in Housing Benefit or Housing Costs Element in Universal Credit if their property is deemed to have one or more spare bedrooms. This came into effect in April 2013. The benefit cap is a limit on the total amount of benefit that a claimant can receive. This came into effect in 2013 and was revised in 2016. These policies have led to an increase in demand for one-bedroom dwellings (bedroom tax) and decrease in demand for four-bedroom dwellings, due to affordability concerns related to the benefit cap. This has led to a significant decrease in demand from Registered Providers for 4-bedroom properties. The SHMA does not reflect the changes in demand resulting from these key national policy changes and therefore cannot be relied upon to guide mix requirements in 2022. This should be done through the Local Plan Review, including a new SHMA, and not pursued through this SPD.	Noted, the evidence base (HEDNA) is currently being updated.	No Change.

			<p>Notwithstanding the above, any mix requirements should be flexible to take account of differences between localities and site-specific factors. The mix should also take account of the various tenure mixes required in different Housing Need Concentration areas. The mix should be tailored to reflect the specific requirements of different Housing Need Concentration areas, for example those areas with a greater proportion of intermediate tenure will likely require more 2-and 3-bedroom properties than those with a greater amount of social/affordable rental provision which will likely have a greater demand for smaller units, including 1-bedroom properties. When the SHMA is updated, it should consider different mixes for different tenure requirements and different localities.</p>		
AH52	Pegasus (on behalf of Persimmon Homes Central)	Paragraph 5.11	<p>At paragraph 5.11 the SPD states that the Council “promotes the use, and reference of, the Nationally Described Space Standards as an initial framework in achieving affordable homes with satisfactory internal living space.” The delivery of well-designed affordable homes with good internal living space is supported and this can be achieved through the application of policies in the Local Plan through the development management process. However, reference to the Nationally Described Space Standards (NDSS) is not supported. National Planning Guidance Housing: optional technical standards (paragraph 020) clearly states that “Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:</p>	<p>This is not a requirement; it is a recommendation which aims to encourage the Nationally Described Space Standards (NDSS).</p>	No Change.

			<ul style="list-style-type: none"> • Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example to consider any potential impact on meeting demand for starter homes. • Viability –the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. • Timing –there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions. <p>It is clear from the above that the introduction of the NDSS requires a Local Plan policy which has been fully evidenced, justified and viability tested. It is not appropriate to introduce the NDSS through an SPD which is not subject to these same requirements and any reference to the NDSS should be removed from the SPD. This should instead be considered through a Local Plan Review and any introduction of the NDSS would need to be based of robust, justified evidence which has been viability tested.</p>		
AH53	Pegasus (on behalf of Persimmon Homes Central)	Paragraph 5.14	The SPD continues to consider the general requirements for the integration of affordable homes within a residential development. Paragraph 5.14 acknowledges	Noted, the detail would be agreed as part of the planning process.	No Change.

			<p>the need for realistic management practices to form part of this process. This is supported and, in practice, means that a certain degree of clustering of affordable dwellings will be acceptable as a requirement of the Registered Providers’ ongoing management.</p>		
AH54	Pegasus (on behalf of Persimmon Homes Central)	6.12	<p>Paragraph 6.12 states that CCC will consider reduced affordable housing provision on redeveloped brownfield sites where developers are able to demonstrate vacancy of more than 12-months, but this is not applicable to buildings that have been abandoned. It is not clear where the 12-month vacancy period has come from as the National Planning Guidance: Planning obligations is clear that vacant building credit applies where the building has not been abandoned (paragraph 28). The PPG does state that it may be appropriate for authorities to consider whether the building has been made vacant for the sole purposes of re-development, but it does not set out any defined time period of vacancy required for a site to benefit from VBC. The PPG states that the policy “is intended to incentivise brownfield development, including the reuse or redevelopment of empty or redundant buildings” (paragraph 28). It does not require buildings to have been vacant for 12 months, indeed this would not contribute towards the policy objective of incentivising brownfield development if sites were required to be left vacant for 12 months before they could qualify for VBC. This reference should be removed from the SPD.</p> <p>If a site meets the requirement to be eligible for Vacant Building Credit (VBC) then national policy states that “developers should be offered a financial credit</p>	Amend Paragraph 6.12 to bring it in line with National Planning Practice Guidance on Vacant Credit and Local Plan Policy. Each application will be considered on a case by case basis.	Amended para 6.12 to reflect national policy and guidance, and adopted Local Plan policy.

			<p>equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought” (National Planning Guidance: Planning obligations, paragraph 026). It is clear that where VBC applies, it is not for the Council to consider reduced affordable housing provision, it should be applied as per the floorspace calculations set out in national policy and the SPD should reflect that.</p>		
AH55	Pegasus (on behalf of Persimmon Homes Central)	Section 7	<p>Section 7 is concerned with alternative contributions. This is also referred to a point 5 of Policy H6 of the adopted Local Plan. The first part of this section sets out that in the first instance, the Council may consider alternative contribution through an alternative location. The SPD sets out that alternative sites should be within a reasonable distance of the development site, in an area with the same or greater need to affordable housing and provide the same advantages and access to amenities and services. This is highly unlikely to be feasible in practice as any alternative site would need to be under the control of the applicant to be available and suitable for development in order to deliver affordable housing. Paragraph 7.6 acknowledges that consideration of alternative locations to provide affordable housing will be on a site by site and proposal by proposal basis. In view of the concerns set out, it is extremely unlikely that any proposed development would be able to take this approach to affordable housing. This should not be the ‘first instance’ approach to off-site affordable housing delivery. This approach would complicate the delivery of affordable housing in the City rather than assisting it which is the overall aim of this SPD. This section should be removed from the SPD.</p>	<p>Noted, SPD to be updated to reflect that this is the council expectation but not a requirement.</p>	<p>Paragraph 7.2 updated.</p>

AH56	Pegasus (on behalf of Persimmon Homes Central)	7.12	<p>The section goes on to consider alternative contribution as a commuted sum. Paragraph 7.12 states that a commuted sum will be considered where alternative delivery opportunities have been clearly and demonstrably exhausted. The adopted Local Plan does not support this approach. The policy clearly prioritises on-site provision unless exceptional circumstances (which could include viability considerations) are demonstrated. The supporting text goes on to state that “Where all options for securing on-site provisions have been explored and exhausted, alternative sites may be proposed, or a financial contribution may be agreed.” (page 56). The Local Plan does not state a preference for either type of off-site affordable provision, nor does it require that alternative sites must be exhausted before a commuted sum is considered. It is inappropriate for an SPD to change this approach to favour alternative sites over commuted sums as this approach should be subject to examination to determine its feasibility and viability. The SPD should reflect the Local Plan and allow for both approaches without expressing a preference for one over the other.</p>	Noted, SPD to be updated to reflect that this is the council expectation but not a requirement.	Paragraph 7.2 updated.
AH57	Pegasus (on behalf of Persimmon Homes Central)	General	<p>There is research from Lichfields which identified a number of benefits in respect of off-site affordable housing. These include increased delivery of affordable housing, ability to bring forward sites that are difficult to deliver, delivery of affordable housing in areas where there is a locally identified need, the potential to secure a more balanced community, empowering LPAs to influence delivery of affordable housing and preservation of listed buildings/redevelopment in Conservation Areas. One of the recommendations of this paper was that LPAs</p>	Research is noted.	No Change.

			<p>should look more favourably on applications where on-site affordable housing is demonstrated as unviable, to accept off-site contributions and the value they can make in the local market in respect of meeting identified housing needs. This research demonstrates that there are benefits to commuted sums for affordable housing which supports the position that an alternative location approach should not be preferred above commuted sums.</p>		
AH58	Pegasus (on behalf of Persimmon Homes Central)	7.15 & 7.21	<p>Section 7 also states that off-site housing affordable housing provision may result in a material benefit to the developer and as such the Council will seek an increased proportion of affordable units on an alternative site or as part of a commuted sum. Paragraph 7.15 acknowledges that this will need to take into account the viability assessment which is supported. In terms of calculating the commuted sum, the Local Plan sets out that this should be calculated by subtracting the residual land value of the site with 25% affordable housing from the residual land value with 100% market housing. Paragraph 7.15 should clarify that the SPD is not seeking to change the approach to calculating the commuted sum as the Planning Obligations PPG is clear that policies for planning obligations should be set out in plans and examined in public, and that it is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in SPDs (Paragraph 004). Paragraph 7.21 sets out a formula for calculating the commuted sum which does not align with the Local Plan. This should be removed from the SPD.</p>	<p>We note the provision of a calculation utilising Residual Land Value in the Local Plan. We believe that the calculation provided in the SPD is both easier to use and provides a more equitable calculation.</p> <p>Notwithstanding we acknowledge that the wholesale removal of the RLV calculation may be considered inappropriate. Instead the SPD will be amended to note that the RLV calculation can still be used if the applicant wishes. Further, in that instance, we will stress that it is the responsibility of the applicant to provide a clear and transparent calculation of Residual Land Value (both with and without the Affordable Housing) which may be subject to external appraisal at the applicants cost, as per established practice with Viability Reports.</p>	Para 7.21 updated

AH59	Pegasus (on behalf of Persimmon Homes Central)	7.19	Paragraph 7.19 acknowledges that in cases where management arrangements cannot be agreed with a Registered Provider for on-site affordable housing, a commuted sum may be accepted as an alternative. This approach is generally supported and provides required flexibility. The Council requires strong and demonstrable evidence to support this but states it can be in any form that can be independently verified. This is most likely to take the form of confirmation from RPs that they cannot agree management arrangements for a site.	Noted, the council requires strong and demonstrable evidence in such cases as set out.	No Change.
	Pegasus (on behalf of Persimmon Homes Central)	8.3	Paragraph 8.3 sets out a list of preferred Registered Providers. This list is too short for this market and should be expanded. The purpose of this SPD is to assist with the delivery of affordable housing in the City. A restrictive list of Registered Providers will work against this aim and could stifle new investment in the City.	Paragraph 8.4 outlines a mechanism for engagement with alternative providers.	No Change.
AH60	Pegasus (on behalf of Persimmon Homes Central)	8.4	Paragraph 8.4 continues that where the developer wishes to offer their affordable housing provision to a Provider not referenced then evidence and details of this provider will need to be made available, including showing whether the provision is deliverable with an alternative RP. It states that it is at the Council's discretion to accept an alternative provider and the preference is to work with the listed RPs. It should be acknowledged that there are circumstances when the listed RPs do not wish to take affordable housing provision at certain sites or there are other issues which mean they cannot take on affordable housing plots. On such occasions, when an alternative provider can be identified to ensure the delivery of on-site affordable provision this should be treated favourably by the Council and the SPD should make this clear.	Noted, the SPD already covers this issue.	No Change.

AH61	Pegasus (on behalf of Persimmon Homes Central)	General	The SPD acknowledges there are a range of other affordable products which are not managed by RPs. These includes private rented accommodated (build to rent), intermediate products (affordable home ownership schemes) and self-build homes. It should be noted that self-build homes meet a different housing need to affordable and are unlikely to be support affordable provision.	Noted, however however some self build and custom build products may well be able to meet the affordable needs of the city (for example where an organisation may wish to deliver some custom build homes which can help address local needs). This would be addressed on a case-by-case basis. Para 8.12 amended to provide more clarity on this point.	Amended para 8.12
AH62	Pegasus (on behalf of Persimmon Homes Central)	Section 9 – s106 template	Persimmon Homes also have comments on the s106 precedent template. The ‘affordable housing commuted sum’ definition is inappropriate and should be amended to reflect the residual land value calculation as set out in the adopted Local Plan. Please refer to our previous comments on Section 7 in relation to this matter.	See response to AH58	
AH63	Pegasus (on behalf of Persimmon Homes Central)	Paragraph 2.1.2	The Affordable Housing Scheme Document set out in the s106 template (paragraph 2.1.2) should not unnecessarily duplicate matters already agreed through the planning consent, for example the location, type, mix, tenures and sizes are all defined and agreed with the Council through full or outline/reserved matters consents. The planning consent should be the approval and any variation to the location, tenure or mix of units should be varied through the planning system and should not require a deed of variation.	The template is indicative, and detail will be dealt with on a case-by-case basis.	No Change.
AH64	Pegasus (on behalf of Persimmon Homes Central)	Paragraph 2.1.5	Paragraph 2.1.5 should be amended so that occupation of market housing units is linked to construction of affordable housing rather than their transfer to a registered provider as this is not in the control of the developer.	The occupation of market dwellings and the transfer of affordable to a Registered Provider are considered comparable metrics and so this clause will remain.	No Change.

AH65	Pegasus (on behalf of Persimmon Homes Central)	2.2.3 & 2.3	Paragraph 2.2.3 refers to circumstances when the owner cannot dispose of the Affordable Housing Units. This should include a defined timeframe for these actions. At paragraph 2.3, which relates to alternative Registered Providers, a timeframe should be set out for a decision from the Council which, if not met, then deemed consent should apply.	The clauses as drafted already provide a clear mechanism for this process.	No Change
AH66	Pegasus (on behalf of Persimmon Homes Central)	Part 6	Part 6 addresses First Homes and should follow the drafting issued by Homes England ² . https://www.gov.uk/government/publications/first-homes-model-section-106-agreement-for-developer-contributions	Part 6 will be updated with the wording released subsequent to the launch of the public consultation.	Section 106 template updated
AH67	Pegasus (on behalf of Persimmon Homes Central)	Conclusions	Overall, it is considered that, in its current form, the SPD includes requirements which will cause issues with the delivery of affordable housing. In particular, sections relating to mix, space standards and off-site contributions should be reviewed. The SPD must comply with national guidance which requires obligations and space standards to be examined through the Local Plan-making process. The SPD should also reflect changes in national housing and welfare policy since the adoption of the Local Plan which have impacted demand for affordable housing, particularly for 1-bed and 4-bed plus properties.	The SPD does not set new space standards, but strongly encourage them. Comments regarding off-site contributions are addressed in previous comments. The SPD is responsive to national and local changes since the adoption of the Local Plan.	No Change.
AH68	Resident – Bridget Harper	Executive Summary	I understand the role of the Local Development Plan 2011-2031 and the National Planning Policy Framework 2021. Integral to this is the City Council made up of elected Councillors and Officers who take decisions on behalf of Coventry citizens from richly diverse communities. These decision makers cannot be expected to act wisely without agreed policy frameworks. They are 'a statement of intent'. If there is no 'planning policy' as	Noted.	No Change.

			stated how can decisions be made by CCC Planning Committee on any issue.		
AH69	Resident – Bridget Harper	General	<p>I am a member of the Council’s Adult Social Care Stakeholders Group and have assisted with the co-ordination of Coventry Older Voices, a Voluntary sector organisation for people over 50. The gradual rise in numbers of people over 60 is well documented highlighting particular housing needs for those, who as they age, are also needing increased support and care for their health and well-being.</p> <p>With respect to any new housing developments for both older people and adults with special needs it is essential for a multi-agency approach throughout the planning and development process. This should also include developers, builders, and service users. To achieve this climate of Co-production, believe there clearly needs to be a total paradigm shift in the culture of Planning departments.</p>	Noted, the stakeholders listed will be invited to participate in any local plan review process, as set out in the adopted statement of community involvement.	No Change.
AH70	Resident – Bridget Harper	Chapter 7	<p>I do have serious concerns regarding ‘Alternative Contributions through an Alternative Location’.</p> <p>Maximising the number of dwellings with an on-site/off-site split could become socially divisive. In every neighbourhood irrespective of the property people live in, services and amenities are for the benefit of the whole community and would not be solely restricted to those in Affordable Housing or those on the main Development site.</p>	Alternative contributions or alternative locations will only be considered once on-site affordable housing has been demonstrated clearly and rigorously to not be achievable.	No Change.
AH71	Resident – Bridget Harper	General	Of greater consideration is the sense of belonging, social cohesion and in the quality of human relationships. This evolves over time in many cases across generations and	Noted.	No Change.

			<p>even whole lifetimes. There are several examples in our City of post-war developments where emphasis on a greater number of dwellings took priority over enabling a better quality of life of new residents. This in turn generated problems for years to come.</p>		
AH72	Watkin Jones Group	General	<p>The NPPG within the 'Build to Rent 'chapter (Paragraph: 001 Reference ID: 60-001-20180913) states "as part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent". The Government guidance continues by adding "If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating BTR. This should recognise the circumstances and locations where BTR developments will be encouraged –for example as part of large sites and/or a town-centre regeneration area". The SPD makes no reference to appropriate evidence of a BtR needs assessment being undertaken. On this basis it is also unclear how the Council has assessed the affordable housing need of this sector.</p>	<p>The scope of this SPD is limited, as it can only elaborate on Local Plan Policy. However, the evidence base is being updated and will be used to inform the process of local plan review.</p>	No Change.
AH73	Watkin Jones Group	General	<p>It is important to note that the 2017 Local Plan policy for Affordable Housing (Policy H6) does not anticipate the BtR product (the 2012 NPPF was guidance at the time which also did not anticipate BtR) and therefore does not acknowledge the specific viability circumstances of this tenure. At paragraph 2.9, the Council notes that the above policy was set within the housing needs set out at the time (and in line with the 2014 Housing and Homelessness Strategy, and 2015 SHMA). On this basis,</p>	<p>The scope of this SPD is limited, as it can only elaborate on Local Plan Policy. However, the evidence base is being updated and will be used to inform the process of local plan review.</p>	No Change.

			very limited weight can be attached to this policy for assessing BtR developments		
AH74	Watkin Jones Group	Paragraph 1.3	<p>Turning to the affordable housing approach to BtR, by way of context, at paragraph 1.3 the SPD notes the Glossary at Annex 2 of the NPPF, which defines Supplementary Planning Documents. It would be appropriate for the Council to also note Government guidance in the National Planning Practice Guidance—for example (author’s emphasis):</p> <p><i>"Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development." [our emphasis] (reference ID: 61-008-20190315).</i></p>	Noted.	No Change.
AH75	Watkin Jones Group	General	We consider that the Council’s stated approach towards affordable housing in BtR developments is either confused, or unreasonable/ unviable. Affordable housing in BtR is commonly known as affordable private rent.	Noted, explored in the comments below.	No Change.
AH76	Watkin Jones Group	2.4	<p>Firstly, at paragraph 2.4 of the SPD the Council acknowledges the definition of affordable housing in housing for sale or for rent in the NPPF. This includes:</p> <p><i>"Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents</i></p>	Noted.	No Change.

			<i>(including service charges where applicable)”;[our emphasis]</i>		
AH77	Watkin Jones Group	Page 12	<p>At page 12 (related to paragraph 4.3) the summary of tenures and locational factors states for Affordable Private Rent (Built to Rent/PRS), it states:</p> <p><i>“Affordable rental homes made available at least 80% discount on market rate. Products made available directly by developer, with ongoing management and operations maintained by the developer. Perpetuity secured by legal agreement.”</i></p> <p>The above policy is substantially different to National Policy without the provision of any shared evidence or financial assessment. It is also contrary to the statement that appears at paragraph 9.3 which refers to implementation and Section 106 Agreements. This paragraph states that such Agreements:</p> <p><i>“will also establish that rental levels, services charges and other costs associated with shared ownership are, and remain, affordable. These costs should reflect a material discount from the general market rate, of at least 20% as a minimum discounted rate”.</i></p> <p>The statement at page 12 is also contrary to the SPD’s Appendix 2, where the Council define “Affordable Private Rented Housing” (elsewhere the Council uses the phrase “affordable private rent”) as:</p> <p><i>“housing let by a landlord who is not a Registered Provider which is subject to a rent of no more than 80%</i></p>	The SPD has been updated to rectify this mistake.	The table underneath paragraph 4.3 corrected to reflect the fact that Affordable rental homes should be made at least 20% discount on market rate.

			<p><i>of the local Market Rent (including Service Charges, if any) and is to remain as such in perpetuity”</i></p> <p>Indeed, the Council’s policy for Social Rent/Affordable Rent is set out in the table as:</p> <p><i>“Affordable Rent is no more than 80% of market rent and includes the service charge, if applicable”</i></p> <p>This would suggest that the approach towards BtR affordable private rent is at a substantially greater discount than social rent –again without any justification.</p>		
AH78	Watkin Jones Group	General – Policy H6	<p>Policy H6 incorrectly anticipates both social/affordable rental and intermediate accommodation to be included within BtR development proposals, rather than discounted market rent alone. This could be usefully clarified by the SPD.</p> <p>We therefore strongly request that the Council sets out clearly that the affordable element of BtR should be as contained in the NPPF until such time that the Council undertakes further need and viability assessment as part of a statutory development plan document process. Until such time, the draft document does not provide the “clear and understandable advice” as anticipated in the SPD’s Executive Summary.</p>	The SPD has been updated in line with National Planning Policy and Planning Policy Guidance in order to provide clarity on the affordable housing requirement associated with Build to Rent developments.	Chapter 5 to updated to provide clarity on affordable housing requirements associated with Build to Rent developments.
AH79	Watkin Jones Group	Appendix 2 (Page 38)	At page 38 (Appendix 2) of the SPD the Council sets out the expected “Build to Rent Housing Strategy”. It stated means is a strategy that relates to Market Housing Units that are proposed to be Occupied as Build to Rent Housing and which must include:	This requirement will be amended so that is clear that the requirement is meant only for the affordable private rent units coming forward within the Build to Rent scheme. The local marketing is required to ensure	Build to Rent Housing Strategy Definition updated

			<p><i>“(a) Local marketing to be adopted within the city of Coventry for the first 3 months;”</i></p> <p>Firstly, it is not clear what this requires from promoters of BtR. However, it would be unreasonable to suggest that the only residents within the Council were able to access any new accommodation, or indeed that marketing would not be permitted outside of the City. This therefore requires further evidence to support any staged local marketing process, which would otherwise not accord with any national policy.</p>	that all affordable units are promoted to alleviating the affordable housing need within the city.	
AH80	Watkin Jones Group	5.9 – 5.10	At paragraph 5.9 the Council discusses the range of unit sizes that should be targeted in affordable housing provision. Whilst recognising flexibility in the application of this, it should be specifically recognised in the SPD at paragraph 5.10 that flexibility might also be reasonable for BtR developments which commonly offer a greater mix of smaller unit sizes	Such arguments need to be brought forward by applicants on a case-by-case basis.	No change
AH81	Watkin Jones Group	4.5 – 4.6	At paragraphs 4.5-4.6 the Council discusses First Homes policy. In accordance with the NPPF (paragraph 65), the guidance should make it clear that First Homes expectation should not apply to exclusively BTR developments, or other forms of specialist accommodation.	Noted and agreed, the SPD has been updated to reflect this.	Footnote outlining exemptions to the requirement of 10% Intermediate provision added to page 13.
AH82	Watkin Jones Group	General – Co-living	We welcome the support for this specific product in the City which can offer a more affordable proposition with	This is covered in Section 6 of the SPD.	No Change.

			the added benefit of local community. Off-site contributions in lieu of affordable housing on-site is a common approach and is welcomed. However, the policy should make it clear that development viability will be taken into account when assessing the appropriate levels of financial payment.		
AH83	Watkin Jones Group	Conclusion	We strongly believe that the Council needs a clear policy in respect of BtR in terms of establishing need; the approach to affordable housing (specifically, the discounted market rent tenure); and clarity around other aspects of national policy for the reasons set out in this representation. In the absence of supporting evidence of need and the lack of viability testing it would be unreasonable to do more than reflect the national policy approach within this Supplemental Planning Document. This is particularly important given the current lack of BtR experience of such matters in the local planning authority, and that the BtR market has yet to be proven for the City.	Noted, the evidence base is in the process of being updated to inform any future policy change (which would be beyond the scope of this SPD). The SPD will be updated to reflect National Policy regarding Build to Rent.	Amendments made to the table at 4.3, para 17, para 5.19 (add in new para 5.20) to provide clarity on BtR.

Strategic Environmental Assessment Screening:

Comment Reference	Respondent	Page/Para Reference	Consultation Response	Officer Summary	Proposed Change to SPD
AH – SEA1	Natural England	General	A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a	Noted.	None.

			<p>Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>It is our advice, on the basis of the material supplied with the consultations, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plans.</p> <p>Natural England therefore agrees with your conclusions that an SEA is not required for the separate SPD's.</p>		
AH – SEA2	Historic England		<p>With regard to the Affordable Housing SPD SEA Screening Opinion, in terms of Historic England's area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within the adopted Coventry City Council Local Plan which has already been subject to a Sustainability Appraisal/SEA. As a result, we would endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD. However, the views of the other three statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made.</p>	Noted.	None.