

Affordable Housing

Supplementary Planning Document Consultation Statement

April 2021





Affordable Housing Supplementary Planning Document (AH SPD)

Consultation Statement April 2021

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Response analysis

1. Introduction

The purpose of this document is to explain how the council has complied with its Statement of Community Involvement and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in the arrangement of this consultation.

This statement sets out the methods Herefordshire Council has used to engage with both stakeholders and the community in the preparation of the Affordable Housing Supplementary Planning Document (AH SPD) between 24 June and 5 August 2020, including the following:

- Which bodies and persons were invited to make representations
- How those bodies and persons were invited to make representations
- How information was made available to be viewed
- A summary of the key issues raised through representations

2. Preparation of the AH SPD

The current Planning Obligations Supplementary Planning Document was adopted in 2008. There is a need to revise the guidance on affordable housing through an SPD in light of the 2019 National Planning Policy Framework and local evidence.

The Affordable Housing SPD will provide detailed guidance on how policies SS2, H1, H2 and H3 in the Core Strategy should be interpreted and implemented in order to support proposed development and deliver sustainable communities.

SS2 Delivering new homes

H1 Affordable Housing – thresholds and targets

H2 Rural exception sites

H3 Ensuring an appropriate range and mix of housing

Once adopted it will be a material consideration in the determination of planning applications.

The SPD will need to be taken into account in the preparation of planning proposals for residential and mixed-use development from the pre-application stage on and while negotiating and undertaking development feasibility.

3. Consultation Methodology

The council has an extensive consultation database. The list includes individual residents, developers, businesses based across the county, parish and town councils, community and voluntary groups, infrastructure providers, neighbouring authorities, government agencies and elected members.

The purpose of the consultation was to invite views on a number of aspects of the document.

Due to the Covid 19 pandemic, methods of consultation were restricted to online only, in order to follow Government guidelines at the time.

Stakeholders and local community members were informed by email about ways to get involved in the consultation.

The following approaches were undertaken:

- Email to contacts on council database
- Herefordshire council website
- Cabinet members' newsletter

4. The Consultation

The council published the draft AH SPD for public consultation from 24 June to 5 August 2020.

Notification of the consultation and how to take part was sent to Herefordshire parish councils, specified consultees, those individuals who had registered an interest in Herefordshire planning, stakeholders, neighbouring authorities, organisations representing individuals with specific housing requirements, agents and developers.

The document was made available to view and download on the dedicated webpage.

5. Responses to the Consultation

In total, there were 53 individual responses to the survey. Many of the respondents raised a number of points, which are set out in the table of representations with a corresponding Council response. Each comment has been given a reference and this can be found in Appendix 1.

Among those that submitted a consultation response were the following groups and organisations:

Name or organisation
Addington Fund
Almeley Parish Council
Aymestrey Parish Council
Border Oak
Bosbury and Coddington Group Parish Council
Bromyard and Winslow Town Council
Coal Authority
Colwall Parish Council
Credenhill Parish Council
Fownhope Community Land trust and Fownhope Parish Council, Frank Hemming
Hereford Civic Society, Cllr Jeremy Milln
Hereford Community Land Trust
Historic England
Leominster Town Council, Town Clerk
Leominster Town Council. J Preece
Lichfields on behalf of The Church Commissioners for England
Marches Centre for Community Led Housing Ltd
Marden Parish Council
National Grid
Natural England
Natural Resources Wales
Platform Housing Group
Sanctuary Housing
Tetlow King - representing Rent Plus UK Ltd
Watkins
Woodland Trust

As a result of analysis of responses, there are a number of key issues to consider in the preparation of the final draft.

The following is a short summary of the main comments made following the consultation.

- Concerns about sites with capacity for 10 or less units not being required to provide affordable housing.
- Over reliance on building affordable housing through the market and via developers.
- Demand for more community led housing facilitation through policy.
- Commentary on aspects not within the remit of the SPD such as the Affordable targets in the Core Strategy not being appropriate.
- Lack of information on design, space standards, build quality, materials, architectural details, levels of amenity space, parking provision or privacy.
- Not enough on energy efficiency, zero carbon developments and more eco house standards. There should be above minimum requirements around insulation, solar panels, orientation, etc.
- Some organisations questioning as to why they were not listed as partners in the Registered Providers list in Appendix 3.
- Planning is a barrier to affordable housing development.
- Recent developments have been of poor quality design and unsympathetic to the county's natural and heritage assets.
- Should be affordable self-build policies.
- Include reference to the *Transport for New Homes* model on layout and external space, which designs out the dominance of the private car in all residential developments. Standards document prepared by the Hereford Community Land Trust.
- Financial land value gains should be put back in to the community not solely to the landowner or developer.
- Should be specific policies that allocate affordable housing sites.
- The SPD will increase the financial burden of open market housing.
- Questioning of the affordable housing need being high and lack of evidence to show this.
- 2013 Data referenced in the Draft consultation not up to date (latest evidence now available Spring 2021).
- Some concern about the costs associated with the accessibility and wheelchair adapted units, as this will affect site viability.

6. Results

The following questions were asked in the consultation survey:

Q1. Are you satisfied that the approach of the SPD with consideration to both national and local planning policy is the correct one?

45% of responders said yes 55% of responders said no

Q2. Do you agree with the approach to understanding affordable housing need in Herefordshire, and are they accurately represented in the SPD?

58.1% of responders said yes 41.9% of responders said no

Q3. Do you agree with the overall approach as to how the policies are applied to ensure acceptable and appropriately planned affordable housing?

47.6% of responders said yes 52.4% of responders said no

The final question gave an opportunity for any further comment on the document and its approach.

For a more detailed summary of views given, along with council responses and suggested changes to document, please refer to appendix 1.

7. What Happens Next?

Final alterations will be made to the document, as proposed in Appendix 1, before being adopted by the council.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
No details	AH001		Over reliance on building affordable housing on new estates	The Supplementary Planning Document (SPD) needs to elaborate further on the Council's ambitions. The Council is committed to addressing housing need in other ways. The County Plan 2020-2024 ambition is to build publicly owned sustainable and affordable houses and bring empty properties back into use. Decisions and plans to progress this are already underway. Homes England funding is also helping to bring 100% affordable sites forward. Add further text to elaborate on this.	Insert text after last sentence at Paragraph 1.2. 'The County Plan states that the Council will work with housing associations and developers to enable them to build more homes for sale and for long-term rent. In order to drive the delivery of affordable housing, the council will look to develop its own housing stock to provide over 1,000 additional genuinely affordable homes for local people in Herefordshire. Sites with 100% affordable housing are being funded by Homes England and being brought forward through the planning system'.
No details	AH002		Feels public views rarely count and it's the Cllrs who push for planning. Make the planning process more inclusive and take councillors out	Comments from the public must be considered as part of a planning decision. Councillors have a duty to be part of the planning system to represent public views on local issues.	No change
No details	AH003		Ease of planning process and barriers preventing development	The Council is of the view that the approach to affordable housing development set out in this Supplementary Planning Document (SPD) is consistent with national planning policy and guidance. The intention is to clearly express this approach to be taken forward to enable future development based on up to date evidence.	No change
F. M. Green	AH004		We have planning application in for 3 affordable houses which is likely to be refused for the 3rd time. We have other sites available, but will not apply as they will be refused	This is a specific planning issue not related to the SPD as many factors must be taken into account when decisions for housing are being considered.	No change
F. M. Green	AH005		We are prepared to develop affordable housing on our land and appreciate that there is little financial incentive to do so, that said, we would do it if planning was not such a barrier	Many factors must be taken into account when decisions for housing are being considered.	No change
Mr R M Wilson	AH006		Better maps of the areas are required	Agree. The maps are not as clear as those in the Core Strategy on Pg. 104 and 120.	Provide maps with more clarity in Appendix 2.
Benjamin Pardoe	AH007		Affordable housing in Herefordshire are too small. They need a larger footprint on a larger plot with more parking	Noted. Compliance with Building Regulations is the minimum of what any housing must be built to and these are compiled at a national level. Core Strategy Policy SD1 -'Sustainable design and energy efficiency' sets out criteria which development should follow. A Sustainable Building Standards SPD is currently being drafted which will add further detail on what it is expected of housing in the future.	Insert text after last sentence at Paragraph 3.15, 'A Sustainable Building Standards SPD is currently being drafted to provide more detail on the standards housing should be meeting across the county. This is expected to be adopted later in 2021'.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Hereford Civic Society, Cllr Jeremy Milln	AH008	3.2	3.2 Need to strengthen the requirement to provide affordable housing to include incremental developments and not just phased ones. Incremental developments are those submitted under separate applications for adjacent or near adjacent sites where no overall or outline plan has been disclosed to the authority at the outset. I see this is referenced in 3.5	Noted. As stated, this is referred to in Paragraph 3.5. It is important to ensure that applicants do not attempt to circumnavigate the planning system to avoid the delivery of affordable housing. Officers would consider the planning history of a site and how applications have been made to determine whether this part of the policy applies.	No change
Hereford Civic Society, Cllr Jeremy Milln	AH009	3.3	3.3 Agree, but should there be a legal charge on student accommodation so that if resident type changes and the property is released on open market then a contribution should be applied.	Only a 'change of use' application would be necessary via the planning process if the type of housing occupants change. There is nothing in adopted policy that can request this.	No change
Hereford Civic Society, Cllr Jeremy Milln	AH010	3.4	SPD 3.4 Agree to the relief in respect of VBC where schemes are for retention, not for demolition. Schemes involving demolition and new build are already incentivised through VAT relief which does not apply to schemes involving retention and conversion. This is better for carbon targets.	Noted	No change
Hereford Civic Society, Cllr Jeremy Milln	AH011	3.8	3.8 Strengthen the commitment to percentages delivered as affordable in the scheme areas. The term 'indicative target' is weak and bound to result in failure to meet. Use the term 'target minimum' instead.	The term 'indicative' is taken from Core Strategy Policy H1 'Affordable housing - thresholds and targets'. The text in the SPD at paragraph 3.8 is reiterating the policy wording. Alterations to policy wording cannot be made in the SPD.	No change
Hereford Civic Society, Cllr Jeremy Milln	AH012	3.11	3.11 Make it clear if all four criteria need to be met for entitlement to an affordable home or just one (or more). I assume the latter? If the latter apply a minimum period of work or employment in Herefordshire to qualify.	Agree. Need to be clear on what is required to meet the criteria. The intention is that if applicants can meet one of the criteria then they are considered as acceptable.	Paragraph 3.11, after the sentence 'In order to have a local connection a person must;...' Insert 'meet one of the following criteria' and insert 'or' after the first two bullet points: <ul style="list-style-type: none">• live in Herefordshire; or• work in Herefordshire; or
Hereford Civic Society, Cllr Jeremy Milln	AH013	3.13	3.13 A key criterion of affordability is in operation costs not up front purchase/ rental costs. It is most important therefore to set a higher benchmark than the Building Regs minimum particularly with regard to energy efficiency. Please amend this. BREEAM 'excellent' might become the benchmark minimum, although 'Passivhaus' standard should be our target, again in line with our carbon reduction targets.	Agree need to be more encouraging. Meeting Building standards is the minimum of what housing must be expected to meet. To exceed this can only be encouraged as the authority has limited scope to expect Passivhaus standards	Paragraph 1.13, First sentence; Insert "at least" after Affordable housing "at least" should conform to the design standards normally...

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Hereford Civic Society, Cllr Jeremy Milln	AH014	3.14	3.14 On size, design, layout etc. refer to the standards document prepared by the Hereford Community Land Trust	The council welcomes the opportunity to review this document but it cannot be referred to as it is not currently part of Core Strategy. However it can be reviewed with regards to policy in the Core Strategy/Local Plan Update	No change
Hereford Civic Society, Cllr Jeremy Milln	AH015	3.15	3.15 Include reference here to the <i>Transport for New Homes</i> model on layout and external space which designs out the dominance of the private car in all residential developments. It is particularly important for affordable housing to be provided with sustainable transport provision instead (active and public transport facilities) in view of the inherent unaffordability of running cars (as compared to walking and cycling)	Core Strategy Policy SD1 -'Sustainable design and energy efficiency' and MT1 'Traffic management, highway safety and promoting active travel' promote active travel choices using less energy where new developments are concerned. This can be taken into consideration on planning applications for housing. Transport for New Homes can be looked at with regard to new policy making for the Core Strategy/Local Plan Update.	No change
Hereford Civic Society, Cllr Jeremy Milln	AH016	3.23	3.23 We should seek the uplift in land value which planning consent bestows upon it, commuted to the benefit of the community, not solely to the landowner or developer. While it is reasonable for the land-owner to be incentivised, the current system needs rebalancing so that affordable or social housing can be delivered to a good standard. Viability assessments should start from this premise.	This is the purpose of Section 106 legal agreements whereby impacts of the development are mitigated through securing financial contributions to deliver off-site community infrastructure, on site open space and play provision and affordable housing. The National Planning Guidance on Viability (September 2019) sets out the standardised approach to analysing the viability of a development site.	No change
Hereford Civic Society, Cllr Jeremy Milln	AH017	3.26	3.26 While the needs for accessible (as well as affordable) housing are likely to increase as our population ages, the needs of a younger cohort suffering chronic 'life-style' conditions should also be recognised here.	Agree, need to be clearer about the inclusion of all ages who may be eligible for supported housing. Negotiations on behalf of this cohort of households are already undertaken through Core Strategy Policy H3 'Ensuring an appropriate range and mix of housing'.	Insert new paragraph after 3.26. 'There will also be a need to ensure there is sufficient supported accommodation for people of all ages with life limiting conditions. Standard accommodation is mostly unable to meet their needs. Supported accommodation includes specific features that enable a better quality of life for the residents'.
Hereford Civic Society, Cllr Jeremy Milln	AH018	3.35-3.37	3.35-7 More required here to how the Council's Register of prospective custom and self-builders might be used to deliver well-designed affordable homes.	The register is a list of interested persons who have expressed a wish to self-build. Within Herefordshire the register profile indicates that the majority of registrants are able to fund the project themselves and are looking for a single rural plot. However the Council recognises that self-build can provide the means of owning a home at a lower cost than buying on the open market. It also recognises that there is potential for delivery of affordable self-build housing through organisations such as community land trusts.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Mrs Patrice Roberts	AH019		Would like to see better use of three bed houses	The Council will be identifying the housing needs of older persons through the HMNA. This will inform negotiations for house types required on sites through Core Strategy Policy H3 'Ensuring an appropriate range and mix of housing' which will help to free up larger properties.	No change
Mrs Patrice Roberts	AH020		Out of date data. Some of the statistics are not current - for example the census since the COVID-19 will have altered the population.	The latest Housing Market Needs Assessment (HMNA) will provide updated needs data. This is due to be published Spring 2021	No change
Michael	AH021		Affordable housing should be located near to large towns rather than in rural locations	Affordable housing is sited in sustainable locations meeting the policy requirements of the Core Strategy.	No change
Rob Hunter	AH022	3.8	Doesn't agree on % split as data is out of date feels it divides north and south. If we develop more in the north jobs will follow	Noted. These targets are reflective of the viability of that area as assessed through the Council's Affordable Housing Viability Study 2010. This will be reviewed as part of the Core Strategy/Local Plan Update.	No change
Bosbury and Coddington Group Parish Council	AH023		The SPD has been carefully thought through and is well presented in easy to understand language. This approach will enable property developers to correctly understand exactly what constitutes "Affordable Housing" and incorporate it accurately into their Planning Applications in a pro-active manner.	Noted.	No change
Leominster Town Council. J Preece	AH024		I think all house mixes on all applications should be dealt with on pre-app planning to help speed up the process of passing planning applications rather than half way through or indeed the latter stages	Noted. Yes the mix is discussed at pre application but it cannot be agreed on an outline pre application as it is only the principle that is agreed. The need could change when a Reserved Matters application comes in. Normal practice is to secure the percentages in the S106 with conditions on the outline permission housing mix.	No change
Dorothy Quayle	AH025		Concerns about the 10 houses rule on allocated NDP sites	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Dorothy Quayle	AH026		Neighbourhood plans are vital and those that have been signed off some time ago are expected to change regardless of the fact that they are legal documents and the Policies within them were carefully considered respecting and in researching local needs which includes affordable housing. The policies stand as far as I know the law has not been rescinded. I expect your Core Strategy to honour the plans and to support the planning department in making the appropriate decisions.	As the update to the Core Strategy/ Local Plan progresses all made neighbourhood plans will continue to form part of the development plan. It is not until the Core Strategy is adopted that the conformity will matter. The timing and adoption of NDPs will be a priority when this time arises. The legislation indicates that it is the last adopted document which will take precedent, therefore it is not until the Local Plan is adopted that the conformity will be an issue. The review of all adopted NDPs will be a priority when this time arises.	No change
I & JL Brown	AH027		Questioned the need for housing for particular persons/groups in society.	It is the Council's ambition to find ways to meet the needs of all sectors of the community and these are set out in the County Plan 2020-2024	No change
I & JL Brown	AH028		40% of the cost of a house is the plot. Liberalise the planning and make more land available to bring down the sell price.	The open market allows for land to come forward at a landowner's willingness to sell or work with developers to bring sites forward. Development Plans allow for development to come forward in the form of allocations. Unallocated sites are assessed against criteria based policies via the planning application process.	No change
Watkins	AH029		I feel that this Council is doing it so that less houses are built. The original document spelt out we needed thousands of homes, we desperately need a huge amount to bring the market price down and keep young people in the area	Affordable housing is a necessary part of housing development. The Core Strategy sets out the overall housing requirements across the county. The Government is expected to publish what the revised housing requirements will be going forward into the future.	No change
Watkins	AH030		Why are you asking this question, there is a reason houses are needed, you don't need to qualify it	There is an obligation to consult with external and internal agencies, partners and the public	No change
Mark Hainge	AH031		The lower limit of 10 houses is too many. Anyone who wants to build 4 houses or more should have to incorporate 25% affordable dwellings in the development.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Mark Hainge	AH032		As the SPD points out, Herefordshire has the worst affordability ratio in the West Midlands. Recent experience of COVID-19 is likely to drive more people to seek housing in the county, as the trend for home working gathers pace. So we should aim to provide a far greater proportion of affordable housing here, to improve our affordability ratio, the social diversity of our county and the sustainability of our communities.	Noted. The County Plan 2020-2024 sets out the Council's ambition for affordable housing provision.	No change
Credenhill Parish Council	AH033	3.8	Disagree on %, feels it is too generic to achieve a balanced mix. Would like the council to adopt a % by town or parish	Affordable housing targets and thresholds have been informed by the Economic Viability Assessment 2014. The work on viability involved the definition of housing value areas which are areas where housing values/prices are broadly similar. These can be seen in figure 5.1 of the Core Strategy. The relationship of postcode areas to Housing Value Areas can be found in Appendix 7.	No change
Credenhill Parish Council	AH034		Affordable housing for the elderly, people who want to downsize is also an issue in the market that leads to many family homes being occupied by people unable to move on leading to a stagnated market. The SPD does not address this issue.	The Council will be identifying the housing needs of older persons through the HMNA. This will inform negotiations for house types required on sites through Core Strategy policy H3 'Ensuring an appropriate range and mix of housing' which will help to free up larger properties.	No change
Sarah Smith	AH035		It would be good if some of the current tenants could be offered this as well. The housing is too small for a family with limited choice for moving.	Noted. The overall aim of the SPD is to maximise delivery of affordable housing whilst ensuring the right need is addressed.	No change
Dr Patricia Ronan	AH036		This policy is outdated, ignores the brutal dynamics of relying on developers to provide affordable housing within commercial schemes, ostensibly ghettoises people in need of affordable housing and completely ignores the need to build sustainably, proving people with eco homes instead of old fashioned high carbon rabbit hutches.	All new housing delivered is built to the government recommended build standards however, developers are encouraged to deliver to higher standards. Core Strategy policy H3 'Ensuring an appropriate range and mix of housing' encourages sustainability and social inclusion.	No change
Dr Patricia Ronan	AH037		There are many empty buildings and spaces within the towns and cities that could be redeveloped into lovely apartments with gardens in the style of the Barbican in London, for example which has been successful. Flooding and other environmental risks should also be included.	'The Council is committed to addressing housing need in other ways. The County Plan 2020-2024 ambition is to build publicly owned sustainable and affordable houses and bring empty properties back into use. Decisions and plans to progress this are already underway. Homes England funding is also helping to bring 100% affordable sites forward. Add further text to elaborate on this.'	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Graham Litson	AH038		I consider that the approach should be passed onto the local Neighbourhood Development Plans produced with guidance from Hereford City Council.	Noted. Hereford City Council are not producing a Neighbourhood Development Plan and all NDP policies need to be in conformity with the Core Strategy policy.	No change
Fownhope Community Land trust and Fownhope Parish Council, Frank Hemming	AH039	1.2, 1.3,	Unfortunately local policy has been devised in such a way that the three developer proposed schemes in our village do not provide sufficient affordable homes. With schemes of 10 and under therefore inevitably avoids any obligation to provide affordable housing.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future.	No change
Fownhope Community Land trust and Fownhope Parish Council, Frank Hemming	AH040	1.12	We don't know how many dwellings will be required in the near future as the numbers required will be dependent on national policy. We don't know enough about the Government's "standard method". (1.12)	Once the Government finalise the approach to the standard method for calculating local authority housing requirements these will need to be taken on board in future development plans by the council.	No change
Fownhope Community Land trust and Fownhope Parish Council, Frank Hemming	AH041		Developments should enable renewable energy infrastructure	Core Strategy Policy SD1 'Sustainable Design and Energy Efficiency' sets out the requirements for sustainable design and energy efficiency. The Core Strategy/Local Plan Update can look at ways to strengthen policy towards zero carbon.	No change
Almeley Parish Council	AH042	3.16 - 3.19	Page 11, paragraphs 3.16, 3.17 and 3.19, Part 8 of the Almeley NDP makes reference to this. The pre-NDP parish survey confirms the local preference for 2/3 bedroom family homes, affordable to the local community, for the limited proposed additional development in this parish. There is also a clear need for a housing needs survey to properly assess the current requirements of the local community regarding the number and type of dwellings needed. In practise, developers are being allowed to concentrate on large executive style housing too expensive for locals to buy.	All housing proposals must meet the criteria set by SD1 of the Core Strategy. Where affordable housing is concerned, the local connection test must be met as set out in paragraph 3.11 of the SPD. The HMNA will provide more up to date information on affordable housing needs across seven housing market areas within the county.	No change
Almeley Parish Council	AH043	3.26 - 3.29	Reliable data on housing need is essential in formulating policy	The latest HMNA will provide updated needs data. This is due to be published Spring 2021	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Almeley Parish Council	AH044		The rental housing sector in Almeley presents something of a conundrum. Attempts to fill vacancies in Housing Association properties, giving preference to those with local connections, produce little interest. There is however a growing number of properties on private developments being purchased to let. It would appear therefore that demand for homes to rent in this parish is generally being met. One possible solution would be to require a proportion of new homes, both for sale and to rent, to be designed to be easily adaptable for occupation by the frail elderly or disabled. This would allow the elderly to remain in their own homes to enjoy a better quality of life. This would also generate full and part-time employment for carers in rural areas.	All new housing delivered is built to the government recommended build standards however, developers are encouraged to deliver to higher standards.	No change
Susan Young	AH045	2.4-2.7	The Housing Register is not an adequate starting point for identifying the need for affordable housing. There are a lot of people, particularly young people, who do not register because they know they will not be offered anything. But they are still in need of affordable housing.	Affordable housing need is identified in a number of ways such as the local housing need surveys and local housing market assessments as well as the housing register.	No change
Susan Young	AH046	3.8	The only policies related to the provision of affordable housing seem to rely upon housing development proposals. The Council needs to be more proactive in ensuring that affordable housing is provided.	The Council is committed to addressing housing need in other ways. The County Plan 2020-2024 ambition is to build publicly owned sustainable and affordable houses and bring empty properties back into use. Decisions and plans to progress this are already underway. Homes England funding is also helping to bring 100% affordable sites forward. Add further text to elaborate on this.	Insert text after last sentence at Paragraph 1.2. 'The County Plan states that the Council will work with housing associations and developers to enable them to build more homes for sale and for long-term rent. In order to drive the delivery of affordable housing, the council will look to develop its own housing stock to provide over 1,000 additional genuinely affordable homes for local people in Herefordshire. Sites with 100% affordable housing are being funded by Homes England and being brought forward through the planning system'.
Susan Young	AH047	3.15	I consider that affordable housing (indeed any housing) should be built to the highest environmental standards. There should be above minimum requirements around insulation, solar panels, orientation, etc. I see nothing about this in the Supplementary Planning Document (SPD).	Noted. Compliance with Building Regulations is the minimum of what any housing must be built to and these are compiled at a national level. Core Strategy Policy SD1 'Sustainable Design and Energy Efficiency' sets out criteria which development should follow. A Sustainable Building Standards Supplementary Planning Document (SPD) is currently being drafted which will add further detail on what it is expected of well-designed housing.	No change
Nigel Cooper	AH048	1.15	Question the ability Neighbourhood Development Plans (NDPs) have to allocate sites specifically for affordable housing. Told we could only adopt a policy requiring (quote) "An appropriate range of tenures, types and sizes of house". (Wellington NDP Policy W3).	Noted all NDPS need to be in conformity with the overall Core Strategy policy to meet the Basic Condition test at examination.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Nigel Cooper	AH049	3.23	Mixed developments with affordable housing must allow for the cost of meeting planning objections where the benefit is shared among all houses. This would apply to all shared facilities on sites like playgrounds, green areas etc., as well as off-site ones e.g. bus stops or school places etc.	The developments must be policy compliant to be approved. Affordable housing is exempt from paying contributions towards community infrastructure, with the exception of off-site play contributions if no play provision is provided on a site.	No change
Nigel Cooper	AH050	3.15	Houses should be of innovative design. They should be of character, easily recognisable and individual. They should be easy to repair and use technology that is readily understandable.	There are building regulations that developments must adhere to for the design and construction of buildings to ensure health and safety. Developments must meet minimum standards on insulation etc. This is a separate process to Planning. To go above minimum standards can only be encouraged through the planning system. Core Strategy Policy SD1 'Sustainable Design and Energy Efficiency' sets out the requirements for this. Additionally an SPD can only add further meaning to policy not change policy.	No change
Woodland Trust	AH051	3.13 - 3.15	We note that the SPD makes no mention of green infrastructure. We urge that affordable housing integrates high quality and well connected green infrastructure, including ecologically appropriate trees & hedgerows. The COVID-19 pandemic has highlighted the importance of access to nature for mental and physical health and wellbeing. In the Climate Emergency context, we must ensure places do not design-in inequalities to the impacts of climate change and biodiversity loss. Following the well understood benefits of woodland for wellbeing, we also highlight our Woodland Access Standard https://www.woodlandtrust.org.uk/media/1721/space-for-people-woodland-access.pdf	The following Core Strategy policies: LD1 - Landscape and townscape, LD2 -Biodiversity and geodiversity, LD3 - Green infrastructure, LD4 - Historic environment and heritage assets, SD1 - Sustainable design and energy efficiency, SD3 - Sustainable water management and water resource all have elements within them to achieve sustainable development and protect the environment by delivering well designed places, spaces and buildings, which use land efficiently and reinforces local distinctiveness.	No change
Platform Housing Group	AH052		SPD reflects the National Planning Policy Framework (NPPF) 2019	Noted	No change
Hereford Community Land Trust	AH053		Should be provision for free pre-planning guidance to registered providers and CLTs for all developments, even where houses for market sale are included in the mix.	Planning fees are set nationally. Pre-application enquiries made by a Registered Social Landlord or Housing Association are exempt from a planning fee where the development is solely for affordable housing. A fee is required if the proposal includes open market units.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Hereford Community Land Trust	AH054		The NPPF paragraph 68 states that councils should identify sites of less than a hectare for 10% of the housing needs. Mention of this should be included in the SPD with information as to where that information can be accessed.	The Core Strategy is still the adopted plan despite predating the 2018 NPPF. The development plan has primacy over the NPPF. Making such a change is a change in planning policy and is not within the remit of the SPD to make that change. The SPD must only compliment and add meaning to policy in the development plan. Such a change can be considered as part of the next Core Strategy/Local Plan Update which has already commenced.	No change
Hereford Community Land Trust	AH055	3.13	While it is understood that HCC has limited scope for exceeding national standards, we are strongly in favour of higher standards in build quality, carbon reduction, environmental protection and presumption towards lower car usage at all developments across the County.	Noted. Compliance with Building Regulations is the minimum of what any housing must be built to and these are compiled at a national level. Core Strategy Policy SD1 'Sustainable Design and Energy Efficiency' sets out criteria which development should follow. A Sustainable Building Standards SPD is currently being drafted which will add further detail on what it is expected of well-designed housing.	No change
Hereford Community Land Trust	AH056	2.1	What is the publication date of the HMANA 2020/21?	The Housing Market Area Needs Assessment (HMANA) is expected to be published in Spring 2021	No change
Hereford Community Land Trust	AH057	2.4	It would also be helpful to publicise figures of housing demand as shown by Home Point bids, for both geographical area of demand and property size (no's of bedrooms and bed spaces), at regular intervals as this would provide information based on actual demand	Home point only captures the need for affordable rented accommodation and not all tenures. Home Point publish this information about bids and the priority band that it was allocated to.	No change
Hereford Community Land Trust	AH058	2.9 & Appendix 2	SPD paragraph 2.9 refers to the Homes England Capital Funding Guide for calculating social rents, which uses as its base line earnings in Herefordshire and Worcestershire. This is inconsistent with Appendix 2 which uses Herefordshire earnings.	Appendix 2 refers to the housing market areas and housing value area. These are in relation to viability of what can reasonably be asked for as a percentage of affordable housing not for calculating rent figures.	No change
Hereford Community Land Trust	AH059	Appendix 3, 3.1	In SPD Appendix 3.1 reference is made to social rent calculation. To encourage building to high levels of energy efficiency, for example PassivHaus standards, allowance for reduced energy bills to tenants should be made in the rent calculation.	This paragraph is about eligibility for affordable housing based on earnings and house prices. It is not pertaining to the calculation of setting a social rent charge.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Hereford Community Land Trust	AH060	3.8	Paragraph 63 of the NPPF there is mention of reducing the 10 home threshold for affordable housing in rural areas to 5 homes, but no mention of this in the SPD. Perhaps this could be included provided there is a demonstrated local need for affordable homes.	A change in the number of dwellings triggering a requirement for affordable housing would require a change in Development Plan policy. This would not be possible through an SPD. The policy is set out in the Core Strategy Local Plan. This will be considered going forward with the Core Strategy/Local Plan Update.	No change
Hereford Community Land Trust	AH061	3.24	In 3.24 of the SPD there is the option that the Council can commission its own Viability Assessment, which it seems goes beyond what the NPPF outlines. This is viewed positively and if the Viability Assessment, whether commissioned by the Developer or the Council, is then made available on the planning applications' part of the council's website, it would be an aid to transparency.	When a viability assessment is submitted in respect of a planning application, the council commissions the Government District Valuation Office who are an independent body from the council to undertake an independent assessment of the valuation. The National Planning Guidance on Viability (September 2019) states that 'Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances. Even in those circumstances an executive summary should be made publicly available.'	No change
Hereford Community Land Trust	AH062	3.2	Consideration should be made for a threshold of 10 houses or where houses are less than 100m ² floor area, consistent with Core Strategy Policy H1 'Affordable housing - thresholds and targets'	No changes can be made to the SPD with regard Core Strategy Policy H1 'Affordable housing - thresholds and targets' thresholds as these are set out in the Core Strategy.	No change
Hereford Community Land Trust	AH063	3.3	SPD paragraph 3.3. There is nothing about encouraging affordable housing as part of city centre conversions/adaptations. The NPPF paragraph 85f is encouraging of residential development in city centres but the SPD seems to exclude conversions for affordable housing. It is recommended that this is revisited to encourage mixed tenure in commercial centres, just as it is encouraged County wide.	Residential development in the city centre does not exclude the delivery of affordable housing; it is not a policy requirement to deliver affordable housing in these schemes. Residential development in the city centre is encouraged to include both open market and affordable dwellings. Affordable housing in the city centre is excluded from paying developer contributions towards community infrastructure.	No change
Hereford Community Land Trust	AH064	3.4	SPD 3.4 Agree to the relief in respect of VBC where schemes are for retention, not for demolition. Schemes involving demolition and new build are already incentivised through VAT relief which does not apply to schemes involving retention and conversion.	Noted	No change
Hereford Community Land Trust	AH065	3.8	SPD 3.8 The commitment to percentages delivered as affordable in the scheme areas should be strengthened by replacing the words 'indicative target' with 'minimum target'.	The term 'indicative' is taken from Core Strategy Policy H1 'Affordable housing - thresholds and targets'. The text in the SPD at paragraph 3.8 is reiterating the policy wording. Alterations to policy wording cannot be made in the SPD.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Hereford Community Land Trust	AH066	3.15	SPD 3.15 Include reference to the 'Transport for New Homes' model on layout and external space which designs out the dominance of the private car in all residential developments. It is particularly important for affordable housing to be provided with sustainable transport provision instead.	Core Strategy Policy SD1 -'Sustainable design and energy efficiency' and MT1 ' Traffic management, highway safety and promoting active travel' promote active travel choices using less energy where new developments are concerned. This can be taken into consideration on planning applications for housing. Transport for New Homes can be looked at with regard to new policy making for the Core Strategy/Local Plan Update.	No change
Hereford Community Land Trust	AH067	3.17	SPD paragraph 3.17 states that where schemes are 100% affordable there should be a range of different types of buildings targeted at different householders. This could reduce the ability to develop small, difficult sites for affordable housing.	Noted	No change
Hereford Community Land Trust	AH068	3.34-3.35	SPD paragraph 3.34 includes self-build and custom-build in both the affordable and market sectors but this is not followed through in 3.35. It would be helpful to clarify that any self-build development can contain a mix of affordable and other homes.	Paragraph 3.35 states that the council will encourage affordable self-build housing within housing developments. It does not specify a particular type of housing development	No change
Hereford Community Land Trust	AH069	3.35	The only mention of Community Land Trusts is in SPD clause 3.35 in relation to self or custom build. CLTs should also be mentioned as partners in the delivery of affordable homes generally, and named CLTs perhaps included in the list of such partners in an Appendix 5b (recognising that no CLT has a current development programme).	The organisations on the preferred partner list are the current organisations that wish to develop in Herefordshire. Applications are welcome from other organisations that wish to become a preferred partner at any point.	No change
Jim Bear	AH070		I am strongly in favour of this proposed SPD 2020 which appears to rectify faults within current planning policy and remove some of the loopholes that plague Planning decisions. This SPD, however may be very useful as far as town planning is concerned but of little value in rural communities. They are too willing in rural affairs to go with the developer instead of insisting on the policies of the CS creating bespoke housing sites for the select few. It is self-evident how HCC are willing to overrule themselves and fail to implement the Core Strategy and advice from the Malvern Hills Area of Outstanding Natural Beauty (MHAONB) to give consent to go for low density/high cost projects instead of vice versa.	All relevant policies of the Core Strategy are applied when considering applications. Consideration of landscape and the AONB are taken into account in policy LD1 'Landscape and townscape' where appropriate.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Jim Bear	AH071	3.2	Urgent consideration should be given to revising the Affordable Housing threshold downwards, below the current 10 dwelling threshold. Urgent consideration should be afforded to housing site densities to ensure that the building sites are maximized.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future. Similarly density is not set out in policy and is assessed on a case by case basis.	No change
Colwall Parish Council	AH072	3.13-3.15	Colwall Parish Council is strongly in favour of this proposed SPD 2020 which appears to rectify faults within current planning policy. Historically HCC has failed to support the Parish in obtaining the maximum development on plots such that the requirement for affordable housing is avoided. HCC has also failed to support the recommended densities in the Core Strategy. As a consequence additional land needs to be found in the Neighbourhood Development Plan to make up the shortfall.	Noted. There is no set out density policy in the Core Strategy. Developments need to be decided on a case by case basis taking the local environment into account.	No change
Colwall Parish Council	AH073	3.2	Urgent consideration should be given to revising the Affordable Housing threshold downwards, below the current 10 dwelling threshold as the Parish Council has advocated in the past.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future.	No change
Sanctuary Housing	AH074	3.8	1. The 40% affordable housing target in certain parts of the county is challenging. It will be difficult for registered providers to secure the acquisition of sites and compete with other developers whilst ensuring a scheme remains viable.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. H1 also allows for a viability assessment where there are concerns about viability	No change
Sanctuary Housing	AH075	? Para	2. The requirement (in most areas of the county) for social rented accommodation as opposed to affordable rent will compound the viability issues discussed above and some flexibility here would be very helpful for registered providers.	The councils encourages further discussion on such matters	No change
Sanctuary Housing	AH076	? para	3. The exemption to local connection for grant funded schemes is welcomed - but are we to assume that this exemption does not apply to nil-grant S106 shared ownership units and a local connection will still be required in all instances?	The councils encourages further discussion on such matters	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Sanctuary Housing	AH077	3.28 - 3.29	4. There needs to be early discussion about wheelchair accessible units and flexibility on what is being provided in the context of the overall affordable housing scheme on any site. Category 2/3 housing. Very often the requirements of category 2/3 housing can have a substantial impact on the layout of a unit/units and their location on site. It would be helpful if the requirement for this type of housing could be identified at the pre-app stage.	This is currently negotiated on a site by site basis reflecting up to date local information. It is advisable to have early engagement with the Housing/Planning team before land purchases to take such matters into account.	No change
Sanctuary Housing	AH078	3.8	Core Strategy Policy H1 'Affordable housing - thresholds and targets' A 40% affordable housing provision is required in the Northern Rural Housing areas (including Bromyard). The LHMA suggests that Bromyard needs substantially more intermediate and affordable rented housing than social rented (in contrast to every other area in Herefordshire). Will any planning application for housing in this area be considered within the context of the LHMA requirements?	Yes this data is relevant when considering housing for the area. It will be updated with the Housing Market Area Needs Assessment (HMNA) which is due for publication in Spring 2021	No change
Sanctuary Housing	AH079	3.26 - 3.29	Core Strategy Policy H3 'Ensuring an appropriate range and mix of housing' - It will be difficult to meet the diverse range of housing required (to achieve the creation of balanced and inclusive communities) on a site of just 50 units, this will substantially impact the viability of a scheme unless the percentage of affordable housing on site can be relaxed to offset the cost of building the specialist accommodation referenced in the policy.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' also allows for a viability assessment where there are concerns about viability.	No change
Maggie Setterfield	AH080	3.15	Needs to be more emphasis on higher construction standards incorporating zero carbon. As Herefordshire has committed to zero carbon by 2030.	Core Strategy Policy SD1 'Sustainable design and energy efficiency' sets out the requirements for sustainable design and energy efficiency. Beyond that Building Regulations set the requirements as laid down by central Government. The Core Strategy/Local Plan Update can explore ways to strengthen policy towards zero carbon.	No change
Maggie Setterfield	AH081	3.15	Need to build for the future - each house must be designed to include secure and convenient cycle storage, with good infrastructure in place to support active travel and ease of use of public transport	Core Strategy Policy SD1 'Sustainable design and energy efficiency' sets out the requirements for sustainable design as well as Policy MT1 on promoting active travel.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Marches Centre for Community Led Housing Ltd	AH082		We would like to see more opportunities for Community Led Housing to be teased out of local planning policy. By Community Led Housing we mean housing where the asset is owned by a local community group.	This will be looked at under the Core Strategy/Local Plan Update as it doesn't feature in the core Strategy so cannot be addressed through the SPD. Angela	No change
Marches Centre for Community Led Housing Ltd	AH083	3.2	Should you be applying a threshold of 5 affordable dwellings to a rural setting?	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future.	No change
Marches Centre for Community Led Housing Ltd	AH084	?	We think that a focus on "housing mix" could be a barrier to small scale community led housing developments. Why is there only one mention of Community Led Housing in the proposed SPD? In the form of Community Land Trust in a self-build format? An opportunity lost perhaps.	National policies require a mix of housing types and tenures to meet a range of needs in the community. This is reflected in the Core Strategy. Therefore this needs to be retained in the SPD. However this does not prevent Community Led Housing coming forward. Any scheme put forward would be considered on its merits and if it was a small scale scheme with justification for the demand for the particular type of housing proposed then this would be duly considered.	No change
Tetlow King - representing Rent Plus UK Ltd	AH085	3.17	The SPD is largely positive in respect of affordable housing delivery and tenure mix, parts of it are currently inconsistent with national planning policy and is not effective as a result. Paragraph 3.17 explains that tenure mix will be negotiated on individual sites having regard to evidence in the LHMA or other up-to-date evidence as appropriate. This general approach is welcomed as it provides for flexibility to respond to local circumstances and means that innovative tenure types such as affordable rent to buy can come forward.	Noted	No change
Tetlow King - representing Rent Plus UK Ltd	AH086	3.18	3.18 is welcome as it allows tenures to be agreed at the reserved matters stage, to be secured by condition, rather than being fixed at the outline stage. This allows providers and developers the flexibility to adapt the tenure mix to respond to needs but also changing market conditions.	Noted	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Tetlow King - representing Rent Plus UK Ltd	AH087	3.19	Paragraph 3.19 is inconsistent with the Framework as it does not accurately reflect the requirements of paragraph 64 of the Framework. Paragraph 64 states that: "Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership... (except in the specified circumstances). Paragraph 3.19 as drafted is more equivocal, simply indicating that the tenure split on each site may vary. In doing so, this risks the 10% affordable home ownership not being delivered. As such, we recommend that paragraph 3.19 is re-worded: The revised National Planning Policy Framework expects at least 10% of the affordable homes to be available for home ownership. In most cases it is expected that this proportion will be secured on each development site.	Agree further clarity required. The council sets out to seek 10% affordable homes on such sites but occasional circumstances arise which mean this is not achievable.	Paragraph 3.19. Delete second sentence and insert the following two sentences: "In most cases it is expected that this proportion will be secured on each development site. In some cases, it may be appropriate to depart from this depending on site-specific considerations and relevant evidence of local need".
Tetlow King - representing Rent Plus UK Ltd	AH088	2.1	The Council's intention to produce a new Housing Market Area Needs Assessment (HMANA) in 2020/2021 is welcomed. It is essential that the Council has an up-to-date understanding of housing need, in line with prevailing national policy, so that those needs can best be catered for.	Noted the HMANA will be reflective of comments received regarding all types of affordable housing	No change
Tetlow King - representing Rent Plus UK Ltd	AH089		Subject to matters raised within this representation being addressed, the SPD sets out an effective overall approach to delivering affordable housing. It offers the flexibility to allow a range of affordable housing tenure types to come forward, and to best respond to local need and site specific factors.	Noted	No change
Tetlow King - representing Rent Plus UK Ltd	AH090	Appendix 3	The definition of Rent to Buy contained within Appendix 3 should be amended as there are a number of different providers which offer rent to buy homes, each with different terms and conditions, which are not reflected in the definition as drafted.	Noted. The councils rent to buy definition was taken as a standard from for what is provided in Herefordshire.	Appendix 3, reword sentence on Rent to Buy to read as follows, Rent to Buy: is housing provided by RPs that is let at an affordable or intermediate rent for a defined period to a household that wishes to buy but is unable to save for a deposit.
Tetlow King - representing West Midlands Housing Association Planning Consortium	AH091	1.7 - 1.10	Definitions: While we acknowledge that the Council has more concisely reproduced national policy to define the various affordable housing tenures at paragraph 1.8, we recommend that the SPD refrains from reproducing national policy and instead simply directs readers to Annex 2 of the NPPF in order to ensure the document's longevity and consistency. In a similar vein, "This section was most recently updated 22 July 2019" from paragraph 1.9 should also be removed.	The SPD is simply setting out the national policy context at the time of drafting but it is acknowledged this can and will change in the future. Noted re the 22 July 2019 reference as this can no longer be referred to as recently.	Paragraph 1.7: add last sentence. Whilst the NPPF is referred to below; it is important to note that the latest national policy and guidance will be applicable once that is made available. Paragraph 1.9, second sentence, Delete: This section was most recently updated 22 July 2019.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Tetlow King - representing West Midlands Housing Association Planning Consortium	AH092	3.14	Space Standards Paragraph 3.14 introduces an element of uncertainty for developers when seeking to understand the Council's policy position on unit sizes for new residential development. Paragraph 3.14 implies that there is a minimum space standard that the Council requires, although this is unclear to developers as there is no adopted minimum space standard in the local plan.	Agree space standards have not been adopted for Herefordshire and the Council does not want to imply that they therefore exist.	Paragraph 3.14, first sentence remove reference to 'and space standards'
Tetlow King - representing West Midlands Housing Association Planning Consortium	AH093	3.13	Distribution of affordable housing: In order to provide further guidance, the Council should consider including text on the distribution of affordable housing across a site. Encouraging pepper potting more generally across a scheme makes management more difficult as the properties are more spread out. Of course, we would not encourage affordable housing to be grouped together in one area, instead recommending that affordable housing is clustered across a site, with policy expressing a maximum group size or range; 10 to 15 dwellings forming each cluster on larger sites is commonly favoured.	This would be a policy change and would not be possible within the remit of the SPD.	No change
Tetlow King - representing West Midlands Housing Association Planning Consortium	AH094	3.26 - 3.28	Supported and Wheelchair Accessible Housing; The guidance as it currently reads does not give any assistance in understanding the likely percentage of accessible dwellings required on site and the standard by which they are expected to be achieved. Referring to paragraph 3.29, there is a significant difference between what is expected for M4 (2) and M4 (3) accessible dwellings. Most notably, M4 (3) compliant dwellings require a greater footprint than M4 (2) dwellings and are therefore significantly more costly for developers to provide.	This is currently negotiated on a site by site basis reflecting up to date local information. It is advisable to engage with the Housing/Planning team before land purchases to take such matters into account.	No change
Tetlow King - representing West Midlands Housing Association Planning Consortium	AH095	3.35	Self and custom build affordable homes in perpetuity, Paragraph 3.35 states that "All affordable self and custom self-build plots will be secured as affordable housing in perpetuity in the same way as other types of affordable housing." The act of securing affordable housing in perpetuity is exclusively applied to rural exception sites, as noted within Annex 2 of the NPPF. To ensure that the SPD is capable of being implemented properly and fairly, all references to retaining affordable housing in perpetuity should be removed unless explicitly relating to rural exception sites.	Agree further clarity is needed here.	Paragraph 3.35, Last sentence, after "All affordable housing self and custom self-build plots... insert 'granted on a rural exception site under Core Strategy Policy H2 'Rural exception sites' ... will be secured as affordable housing in perpetuity in the same way as other types of affordable housing.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Tetlow King - representing West Midlands Housing Association Planning Consortium	AH096	1.17 - 1.18	Entry-level exception sites There is a distinct lack of guidance on entry-level exception sites in Herefordshire. We also agree with paragraphs 1.17 and 1.18 of the SPD that introducing new policy on entry-level exception sites through an SPD would be inappropriate as it is not the role of an SPD to do so.	Noted. The Council would not be able to add further on entry level exception sites as it is beyond the limitations of this SPD. This is something that could be taken forward as part of the Core Strategy/Local Plan Update	No Change
Historic England	AH097	3.13 - 3.15	Under the section 'Distribution and Design' it would be useful to include a section that references the need for any affordable housing schemes to consider the impact on the significance of the historic environment, heritage assets and their settings. Whilst we accept that the purpose of this SPD is to expand upon policy within the Core Strategy DPD with respects to the quantum and type of affordable housing, we do consider that it would be beneficial to ensure that there is a positive strategy for the historic environment and an appropriate link to the relevant historic environment policies is included.	Agree. The following Core Strategy policies: LD1 - Landscape and townscape, LD2 -Biodiversity and geodiversity, LD3 - Green infrastructure, LD4 - Historic environment and heritage assets, SD1 - Sustainable design and energy efficiency, SD3 - Sustainable water management and water resource all have elements within them to achieve sustainable development and protect the environment by delivering well designed places, spaces and buildings, which use land efficiently and reinforces local distinctiveness. There needs to be a reference to the historic environment within this section.	At paragraph 3.15. Insert this final sentence: "The Core Strategy environmental policies LD1-LD4 which are relevant to the historic and natural environment will be applied where relevant when assessing a scheme."
Fownhope Community Land Trust Ltd	AH098	3.6	Par 3.6; All properties will be allocated to people in accordance with Herefordshire's Allocation Scheme. AFTER 'Scheme' INSERT ' and any relevant NDP provisions'. In the alternative INSERT in SPD 3.11 as the fourth bullet point. Reasons. 1. SPD 1.15 refers to NDPs. As there acknowledged some NDPs allocate specific sites to affordable housing. But some NDPs specify priority eligibility for occupation/ownership. 2. An example from Fownhope NDP Policy FW13 is the s.106 in P163707/F Land opposite Mill House Farm Fownhope Herefordshire. The Low Cost Market Housing Units must (unless otherwise agreed by the Council) be allocated in accordance with the Herefordshire Allocations Policy for occupation as a sole residence to a person or persons in need of Affordable Housing one of whom has:- 1.5.1 a local connection with the parish of Fownhope; or 1.5.2 in the event of there being no person having a local connection to the parish of Fownhope a person with a local connection to one of the following parishes: Holme Lacey; Ballingham; Brockhampton and Much Fawley; Woolhope and Mordiford; or 1.5.3 in the event of there being no person with a local connection to a relevant parish referred to in sub-paragraphs 1.5.1.and 1.5.2 of Part 2 of this Schedule any other person who has a local connection to the County of Herefordshire	Agree, the adopted Fownhope NDP is part of the Development Plan for the county with its own connection test criteria at paragraph 18.4. Therefore it is reasonable to include a reference to NDPs with regard to Herefordshire's affordable housing allocation scheme and connection test.	At the end of paragraph 3.6, add ' and have regard to local NDP requirements within policy on local connection'.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Lichfields on behalf of The Church Commissioners for England	AH099	3.7 - 3.12	The Church Commissioners for England support in principle the preparation of the Affordable Housing SPD for the Council to provide further supplementary detail to developers seeking to deliver residential development within Herefordshire. We welcome the approach set out in paragraphs 3.7 to 3.12 on the amount of affordable housing sought within the different housing market areas within Herefordshire in line with Core Strategy Policy H1 'Affordable housing - thresholds and targets'.	Noted	No change
Lichfields on behalf of The Church Commissioners for England	AH100	3.8	Core Strategy Policy H1 'Affordable housing - thresholds and targets' clearly states that the amount and mix of affordable housing including those on strategic sites will vary depending on, amongst other things "an assessment of the viability of the development." This is not reiterated in the draft SPD, which is required to be consistent with adopted policy. Accordingly, the first sentence of paragraph 3.8 should be amended to include reference to the viability of the development to align with Policy H1.	Agree some clarification is required. Changes proposed.	Amend Paragraph 3.8 to include a reference to viability of sites. After first sentence, include a new second sentence: "An assessment of viability may also be necessary to justify any change in affordability targets".
Lichfields on behalf of The Church Commissioners for England	AH101	3.16 - 3.19	We welcome the guidance provided in the SPD on tenure and dwelling type, size and mix (paragraphs 3.16-3.19). It would however be helpful for the SPD to provide additional guidance on an indicative tenure split for affordable housing provision, the preferred income cap for the shared ownership tenure and affordable rent cap. This would be useful for informing initial viability appraisals for development sites. Notwithstanding, if these details are included there should be recognition in the SPD of the need for the tenure split and necessary rent/income caps to be subject to the latest evidence on housing need and site-specific circumstances.	Additional guidance on tenure split etc. is provided in the most up to date needs data available as referred at paragraph 3.17. This refers to footnote 5 which requires updating.	Replace footnote 5 with 'The Herefordshire Market Area Needs Assessment (HMANA) will be available Spring 2021
National Grid	AH102		We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	Noted	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Aymestrey Parish Council	AH103		To be summarised. It is hard to see the purpose of the document. SPDs are supposed to expand on existing development plan policies to assist both applicants and planning decision makers in understanding what is required by the specific planning authority. The Document doesn't include any such guidance. There is no advice about acceptable space standards, build quality, materials, and architectural details, levels of amenity space, parking provision or privacy. There is no suggestion that policies to protect the landscape, heritage assets or the natural environment need to be considered.	The purpose of the SPD is to add meaning to affordable housing policy only. It is not the intention to add new policy on design and space standards etc. The national policy is there to add context to the document at the time of drafting. There are specific design policies within the Core Strategy which should apply to all construction. There are also specific policies addressing landscape. Include an additional paragraph to clarify this further.	Insert new paragraph at Paragraph 1.15 'The SPD will provide more up to date guidance on how to utilise latest evidence on housing need and how this can be applied to sites coming forward. This will enable the council to set out the appropriate affordable housing make up for sites. Its purpose is not to provide further detail on the typical elements looked at in a planning application such as design, materials, and space standards etc. Whilst these elements are mentioned within the SPD for context, the intention is not to provide guidance on these aspects.'
Aymestrey Parish Council	AH104		The approach is generic and could be applied to any county. Would it be appropriate to wait for up to date Local Housing Market Assessment and new Housing Market Area Needs Assessments to provide guidance more specific to Herefordshire?	The latest Housing Market Area Needs Assessment (HMANA) will provide updated needs data. This is due to be published Spring 2021	No change
Aymestrey Parish Council	AH105		The document explains how national policy is applied, but does not expand on or further illuminate any local policies.	The purpose of the SPD is to add meaning to affordable housing policy only. The national policy is there to add context to the document at the time of drafting. There are specific policies within the Core Strategy which should apply to all construction. Include an additional paragraph to clarify this further.	Insert new paragraph at Paragraph 1.15 'The SPD will provide more up to date guidance on how to utilise latest evidence on housing need and how this can be applied to sites coming forward. This will enable the council to set out the appropriate affordable housing make up for sites. Its purpose is not to provide further detail on the typical elements looked at in a planning application such as design, materials, space standards etc. Whilst these elements are mentioned within the SPD for context, the intention is not to provide guidance on these aspects'.
Aymestrey Parish Council	AH106	3.2	Aymestrey Parish Council would encourage the planning authority to use the exemption allowing it to set a lower threshold for affordable housing in designated rural areas, meaning that affordable housing could be delivered from sites of fewer than 10 houses. Aymestrey was designated by The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the West Midlands) Order 1997: https://www.legislation.gov.uk/uksi/1997/620/schedule/1/made .	Aymestrey Parish is not in a rural designated area in relation to paragraph 63 of the NPPF. Right to acquire is not the same legislation. Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Aymestrey Parish Council	AH107	1.15	Contrary to the comment at 1.15 of the draft SPD, NDPs in smaller parishes are unable to deliver affordable housing, despite the need for such housing being repeatedly raised during the NDP consultation process.	The NDPs have the ability to allocate housing including specific sites for affordable housing. Delivery is down to a number of other factors where the parish council, developers and landowners working with the Council have the potential to bring forward sites.	No change
Aymestrey Parish Council	AH108	3.13 - 3.15	The Parish Council would encourage more detailed and specific requirements to improve the design of affordable housing across the county. Many recent developments have been of poor quality and unsympathetic to the county's natural and heritage assets.	All housing applications are decided against Core Strategy Policy SD1 'Sustainable design and energy efficiency' and relevant NDP policies. The Council is in the process of producing a Sustainable Building Standards SPD which will assist in decisions relating to design.	No change
Natural England	AH109		Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Noted	No change
Laura Sommerville	AH110		The options for affordable rented housing in Herefordshire have been dire for a number of years due to national policy of the homeless being a priority for housing. Is this liable to continue in the county especially considering the population increase (higher than the national average) over the last twenty years? Immigration into the county, both internal and external means that local families are often at the bottom of housing priorities.	The Housing Act 1996 requires every local authority to develop and publish an allocations scheme for determining the priorities and detailing the procedures to be followed in allocating social housing. Parliament sets the criteria for eligibility in respect of access to housing in the UK. Affordable rented housing is allocated through an allocation policy whereby applicants must be eligible and must qualify to be accepted on to the councils register. Herefordshire council through the emerging needs data will look to deliver appropriate housing to enable households to have a choice of which affordable housing product that they can access	No change
Laura Sommerville	AH111		The last round of parish consultations (both taxing and sometimes expensive for the parishes) was largely ignored and developers have been allowed to build both extra housing and unsuitable housing following government changes. It has been recently announced that the government will again be relaxing planning permissions in order to achieve their housing targets. Will the same approach be taken by the council in the future?	The council reviews all consultation responses submitted from the public, statutory bodies and organisations. Where reasonable and tangible changes can be made then they are carried out. Local Planning Authorities must take on board targets which are now administered from central Government	No change
Laura Sommerville	AH112	3.11	The appliance of paragraph 3.11 will be key to ensuring the policy will work	Noted	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Laura Sommerville	AH113		No mention is made of whether affordable rented housing will, in the future, be offered to residents to buy. It should be a consideration as to whether or not a stock of affordable housing should be maintained.	Affordable rented housing to buy is available to eligible household under The right to buy or Right to acquire legislation which is separate to the purpose of this SPD	No change
Coal Authority	AH114		Having reviewed your document, I confirm that we have no specific comments to make on it.	Noted	No change
Addington Fund	AH115	Appendix 3	In the Appendix 3 there is reference to 'Preferred Providers' of housing. All providers listed are Registered Social Landlord. It must be remembered that there are a wealth of 'Private Landlords' and other housing providers who are adequately in a position to support the lack of affordable housing within Herefordshire. One of these is the Addington Fund.	The organisations on the preferred partner list are the current organisations that wish to develop in Herefordshire. Applications are welcome from other organisations that wish to become a preferred partner at any point.	No change
Addington Fund	AH116		The Addington Fund has provided a summary of their work which is a farming related grant and funding scheme which assists with housing provision. The charity have suggested that they could provide a good medium for the UK Governments to deliver vital support, administer policy using the Addington Fund as an off the radar mechanism of meeting Government policy.	Noted.	No change
Marden Parish Council	AH117		At its meeting on 13.7.20, Marden Parish Council resolved to comment that it is supportive in principle of the SPD.	Noted	No change
Colin Dickerson	AH118	2.1	The survey 2008 does not seem to be up-to-date.	The 2008 SHMA was complimented by the more Herefordshire focused Local Housing Need study with its final iteration produced in 2013. The Housing Market Area Needs Assessment (HMANA) will provide the latest evidence for housing need and will be published in Spring 2021	No change
Colin Dickerson	AH119	2.12	Shared income - equity should not be fiscal but shared as it is should be on a sliding scale taking earning incomes on a sliding scale.	The mortgage amount can be based on a shared income	No change
Colin Dickerson	AH120	3.2	The level of 10 dwelling threshold should be reduced in an area like Herefordshire where small pockets of land would then become more readily available.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Colin Dickerson	AH121	3.20-3.25	Often developers avoid the responsibility of overall cost of developments, when they have constructed houses stating they have run out of money. This element of the policy should be applied rigorously.	Planning permission is granted based on submitted plans prior to construction. Developers are expected to have made their own viability assessments based on these plans.	No change
Colin Dickerson	AH122	Appendix 2	The maps provided in Appendix 2 lack clarity, cannot base a judgement on the basis of opaque maps (Appendix 2).	Agree. The maps are not as clear as those in the Core Strategy on Pg. 104 and 120.	Provide maps with more clarity.
Leominster Town Council, Town Clerk	AH123	3.8	The threshold target for Leominster needs to be reassessed and brought in line with the general county target (currently 35%). Additional supporting evidence exists in the Local Housing Market Assessment 2013 at pg. 108.	It is recognised that past housing needs studies state that affordable housing need in Leominster is high. However the land values in Leominster are lower compared to other areas of similar need. To support a higher target would mean grant support is required. This was not possible in previous years and 25% became the adopted target. With the requirement to review plans 5 yearly, this target will be reassessed as part of the Core Strategy/Local Plan Update which is underway.	No Change
Leominster Town Council, Town Clerk	AH124	3.15	All development proposals wherever possible, should incorporate the requirements as outlined in Core Strategy policy SD1 - 'sustainability and energy efficiency'. Remove wording 'wherever possible'. Herefordshire Council and Leominster Town Council have declared a climate and ecological emergency.	Agree, the policy does not state 'wherever possible'	Remove the phrase 'wherever possible' from line 4 of paragraph 3.15
Leominster Town Council, Town Clerk	AH125	3.33	Self and Custom Build - This section needs to be updated to specifically reference Community Land Trust (CLT) housing provision.	Additional reference to CLTs has been included.	No change
Leominster Town Council, Town Clerk	AH126	Appendix 3, pg. 25	Preferred partners with a development programme in Herefordshire. The approach of the SPD is too narrow and should take into account all major social housing provider who are building within the county. Review the flexibility and definition of the development programme. Wrekin Housing Trust has recently built a substantial affordable housing scheme in Leominster at Wells Gardens, St Butolphs HR6 0FA	The organisations on the preferred partner list are the current organisations that wish to develop in Herefordshire. Applications are welcome from other organisations that wish to become a preferred partner at any point.	No change
Bromyard and Winslow Town Council	AH127		The document fails to address the issues of delivery of affordable housing in the County of Herefordshire. There is nothing in the document which allows for land subsidies to release more viable sites to reduce the cost of housing for sale, affordable or socially rental.	The document has limited scope for addressing the matter of delivery. The purpose of the SPD is to work with the need and enable affordable housing development through the planning application process.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Bromyard and Winslow Town Council	AH128		It is important to note that windfall sites in non HMA areas are generally less than ten units without affordable obligations and in the main Class Q consents offer no affordable contribution at all therefore increasing the proportion of affordable housing in the Market Towns and the HMA's which is not recognised in the consultation plan, this leads to an unequal distribution of affordable housing across the County by any definition.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies. The Core Strategy/Local Plan Update will be able to reconsider such thresholds in the future. Core Strategy Policy H2 allows for small rural affordable housing schemes not normally released for housing.	No change
Bromyard and Winslow Town Council	AH129		The application of 'planning balance' can be exercised in relation to RA2 and RA3 where a developer introduces an element of affordable housing into schemes of less than 10 dwellings on the grounds that the advantages outweigh the disadvantages.	This would not be relevant to the planning balance. Core Strategy Policy H1 'Affordable housing - thresholds and targets' sets out the thresholds for when affordable housing is required. It is not within the scope of the SPD to alter development plan policies.	No change
Bromyard and Winslow Town Council	AH130		The affordability income to house price score is highest at 9.5 for Bromyard and Winslow area. There is nothing in the consultation plan to address this situation except wishful thinking (Table 1).	The document has limited scope for addressing the affordability issue per se. The Housing Market Area Needs Assessment (HMANA) will set out the latest situation regarding affordability. This will be published Spring 2021. The County Plan is more explicit in its ambitions for addressing the affordability issue.	No change
Bromyard and Winslow Town Council	AH131		The only way in for first time buyers is shared equity at normally 40/60% however as equity rises on the 40% so it does on the 60% leading to nowhere for the buyer.	There are various products available for first time buyers. This includes Shared Ownership, shared Equity, Low Cost Market and Discounted market. Each product has its own benefits	No change
Bromyard and Winslow Town Council	AH132		Due to high land costs, even with subsidy, it is difficult for developers working with Social Housing providers to supply the much needed lower rental stock, hence the County is a bounty for private landlords. If the plan were serious it would be advocating the investment by the Local Authority in social homes build (once known as Council Housing) as Councils now have more borrowing powers and more latitude in investing from sales of other assets, however the plan is silent on this.	The Council is committed to addressing housing need in other ways. The County Plan 2020-2024 ambition is to build publicly owned sustainable and affordable houses and bring empty properties back into use. Decisions and plans to progress this are already underway. Homes England funding is also helping to bring 100% affordable sites forward. Add further text to elaborate on this.	Insert text after last sentence at Paragraph 1.2. 'The County Plan states that the Council will work with housing associations and developers to enable them to build more homes for sale and for long-term rent. In order to drive the delivery of affordable housing, the council will look to develop its own housing stock to provide over 1,000 additional genuinely affordable homes for local people in Herefordshire. Sites with 100% affordable housing are being funded by Homes England and being brought forward through the planning system'.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Bromyard and Winslow Town Council	AH133		The Dutch Judgement - No account has been taken of the Dutch Judgement which is/will add considerable cost to developers in mitigation e.g. The Bromyard Strategic site planning application is suggesting only 5% affordable units as being viable.	The Dutch judgement regarding the increase in phosphate pollution is being addressed through a 'River Quality Supplementary Planning Document (SPD)' which will be consulted upon. It is not within the scope of this SPD to consider this specific issue. The Government Planning Policy Guidance on Viability (September 2019) requires abnormal costs to be taken into account when assessing the viability of a site. A viability assessment may conclude that a scheme is viable or that a reduction in affordable housing or financial contributions (or both) is required to enable a viable scheme to be delivered. The phosphate issue is not affecting viability of the Bromyard Strategic site.	No change
Border Oak	AH134		From a local perspective there is not enough within the document to reflect the specifics of Herefordshire nor to allow each NDP area to control and facilitate delivery of affordable housing. More emphasis should be placed on identifying needs on a micro level and enabling communities to deliver this through their NDP	Noted, NDP can include specific policies but they will need to conform to overall Core Strategy policy in order to meet the Basic Condition test at examination.	No change
Border Oak	AH135		Concerned about how the affordable housing need has been assessed and collated and data appears to be not current with references to 2008, 2011 and 2013. Need to set out how often data is it updated.	The targets (paragraph 3.8 of the SPD) requirements for sites are set out in the adopted Core Strategy. These targets are based on evidence produced at the time the Plan was adopted. The Housing Market Area Needs Assessment (HMANA) will set out the latest situation regarding affordability. This will be published Spring 2021.	No change
Border Oak	AH136		The data is not clear about how it has been split into needs for rented, part ownership, discounted market, open market etc. It does not appear to be based on specific locations required or recognise that some areas have had significant affordable housing provision already. Market towns would appear to have greatest need - but lower percentage requirements (despite being more likely to have scheme of a size than can be viable with affordable housing). Rural area need is much less and can be identified by each village.	The formulation of affordable housing policy is set out in evidence underpinning the Core Strategy at the time of production.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Border Oak	AH137		Affordability should be linked to service/amenity connection and not incur greater costs to occupants due to isolated locations. The data is based upon the lowest earning capacity of 'assumed' residents eligible for affordable housing and 'and not the likely earning values for those in need. So it limits housing provision to the very lowest value and size. This is a big problem especially as the policy increases the affordability gap between open market housing and social housing by forcing open market housing to heavily subsidise affordable housing.	Affordability is based on earnings and house prices. When assessing affordability the median and lower quartile earnings are taken into account. All schemes should be considering viability of sites when undertaking such developments.	No change
Border Oak	AH138		Someone earning £18,000 as a single person is more likely to want to rent and will therefore be most eligible for a one bed flat in a town or Hereford. However a younger/larger family may earn more but still find themselves stuck in small Affordable Housing when they may wish to transfer into open market housing as their needs change. But there is a missing housing stock because the cost of providing affordable housing has meant some developers have to miss out a housing type to be able to make a scheme viable.	Residential developments should provide a range of house types to meet both the open market demand and the affordable demand as set out in Core Strategy policy H3 'Ensuring an appropriate range and mix of housing'. All schemes should be considering viability of sites when undertaking such developments	No change
Border Oak	AH139		Strongly disagree with the overall approach. It is the same approach used for many years (but with harder barriers to viability) and is proven over many years to prevent and restrict all housing delivery. It is not focused on need and not applied to locations of most need. In essence it is a generalised policy applied in a blanket approach and is not targeted on ensuring affordable housing in the right place, of the right type and to the right amounts. It also compromises other delivery.	The SPD is proposing a more up to date evidenced mix of housing need based on the latest Housing Market Area Needs Assessment (HMANA).	No change
Border Oak	AH140		The timing of all of this is concerning - it would be better to retain current policy until Core Strategy is reviewed given that there are also national reviews in place and Herefordshire has a huge housing deficit and moratorium? Many of the NDPs are at a review period too. There is also a change in the standard methodology.	The production of the SPD now is necessary to respond to the current local need make up. The Core Strategy/Local Plan Update is the platform for reconsideration of policy.	No change
Border Oak	AH141	1.2	The use of the term 'decent and affordable' needs better clarification to ensure tone of document isn't weighted.	Decent and affordable' is a term used in the Core Strategy vision. This was based on a number of public consultations and agreed after an examination in public.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Border Oak	AH142	1.3	Assessed need - Need should be better assessed, specific and evidenced, and also up to date and regularly reassessed. The current situation is not acceptable and the data is flawed. Paragraph 1.3 Always attaching affordable housing delivery obligation to 'developers' which misleads the public opinion - need to change this to 'landowners and developers'.	The Housing Market Area Needs Assessment (HMNA) is due to be finalised Spring 2021. This will provide more local up to date information on need. Agree that landowners do have a part to play in affordable housing developments.	Paragraph 1.3, add ' landowners and ' before the word 'developers' in the last line. "The Council supports the Government's aim to secure mixed and balanced communities. Where there is an assessed need for affordable housing, the Government enables local authorities to deliver affordable homes by requiring <i>landowners and</i> developers to provide them within new housing schemes".
Border Oak	AH143		Need to acknowledge the responsibility of housing associations, registered providers and Council to deliver affordable housing. Homes England are clear that they want the majority of affordable housing is to be provided by Housing Associations/registered providers/Local Authorities not s106 -	The Council is committed to addressing housing need in other ways. The County Plan 2020-2024 ambition is to build publicly owned sustainable and affordable houses and bring empty properties back into use. Decisions and plans to progress this are already underway. Homes England funding is also helping to bring 100% affordable sites forward. Add further text to elaborate on this.	Insert text after last sentence at paragraph 1.2. 'The County Plan states that the Council will work with housing associations and developers to enable them to build more homes for sale and for long-term rent. In order to drive the delivery of affordable housing, the council will look to develop its own housing stock to provide over 1,000 additional genuinely affordable homes for local people in Herefordshire. Sites with 100% affordable housing are being funded by Homes England and being brought forward through the planning system'.
Border Oak	AH144		There are specific and skilled businesses who focus on affordable housing delivery who should be supported - policies can be written to allocate land specifically for affordable housing so this needs to be elevated and prioritised through policy.	Core Strategy policy H2 'Rural exception sites' accommodates Rural exception site development of affordable housing. NDPs (paragraph 1.15) can allocate sites. Sites are currently able to come forward as completely affordable sites e.g. Ledbury cricket ground.	No change
Border Oak	AH145	1.8	The terms are too limited and old fashioned. Be specific and all encompassing - need to build in further flexibility and direction including annexed accommodation, disabled/supported housing, alms housing, housing connected to essential work etc. and a specific affordable self-build policy.	The terms are extracted from the current National Planning Policy Framework. The Housing Market Area Needs Assessment (HMNA) will provide the latest evidence on the level of housing need for disabled people and self builds. This will be further reflected in policy in the Core Strategy/Local Plan Update.	No change
Border Oak	AH146	1.9	The Draft SPD cannot be adopted until the test criterion has been applied and the need assessed fully.	Core Strategy Policy H1 'Affordable housing - thresholds and targets' states that need should be based on the latest housing market assessment. Once the Housing Market Area Needs Assessment (HMNA) is available, this will be the evidence relied upon for need.	No change
Border Oak	AH147	1.12	The SPD cannot be fully accommodated or written before the CS review/update.	An SPD can be drafted anytime to support an adopted plan.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Border Oak	AH148	1.15	Very few NDPs establish local affordable housing need or allocate specific sites/exception site. Most are out of date or rendered useless by 5 year land supply. Each NDP area should be given opportunity to set their affordable housing needs and asked to allocate sites for affordable housing specifically. They can also provide design/sustainability guidance and check local connections etc.	Parish Councils can include a wide range of policies within their NDP provided that they are in general conformity with the Core Strategy and with National policy and guidance. Adopted NDPs are deemed as 'out of date' as a whole if the county 5 year housing land supply falls below 3 years otherwise paragraph 14 of the NPPF applies. The Council's 2020 assessed supply is 3.69 years.	No change
Border Oak	AH149	1.17	Changing the SPD will increase the financial burden of open market housing (ironically making this less affordable to compensate) - this is very concerning but needs to be recognised and accepted.	The SPD is being updated to reflect the current Core Strategy and latest housing needs data. All schemes should be considering viability of sites when undertaking such developments	No change
Border Oak	AH150		The current policy and new SPD do not support private delivery providers to engage and absorb affordable housing - There would be a way to word the SPD to make affordable housing and open market housing holistic partners, rather than writing friction into the policy guidance.	Affordable housing is there to be applied by all developers and landowners	No change
Border Oak	AH151		It has caused great harm that s106, affordable housing provision obligations are regardless of true Housing delivery viability, when the majority of affordable housing and s106 monies, plus New Homes Bonus have been created by private delivery - it is about time this was acknowledged and used to help communities accept new homes.	The Council is committed to addressing housing need in other ways. The County Plan 2020-2024 ambition is to build publicly owned sustainable and affordable houses and bring empty properties back into use. Decisions and plans to progress this are already underway. Homes England funding is also helping to bring 100% affordable sites forward. Add further text to elaborate on this.	Insert text after last sentence at Paragraph 1.2. 'The County Plan states that the Council will work with housing associations and developers to enable them to build more homes for sale and for long-term rent. In order to drive the delivery of affordable housing, the council will look to develop its own housing stock to provide over 1,000 additional genuinely affordable homes for local people in Herefordshire. Sites with 100% affordable housing are being funded by Homes England and being brought forward through the planning system'.
Border Oak	AH152	2.1	2008, 2011, 2013 evidence is utterly useless. Cannot even be referred to surely - Housing Assessments should be annual and the overall number required should be reduced as units are provided.	The Housing Market Area Needs Assessment (HMNA) is due to be finalised in Spring 2021. This will provide more local up to date information on need.	No change
Border Oak	AH153	2.2	No evidence to suggest need is 'significantly high'. This is disingenuous and cannot be declared without numbers and evidence. Housing need in general in the county is significantly high.	There is readily available information in the public domain to justify affordable housing need being high in this county	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Border Oak	AH154	2.4	Cannot say 'high' need without using figures - you should provide better evidence of ALL need and explain it is a changing landscape. Also very useful to say how many of each house type have been delivered. HC must know how many houses have been built since 2011 and how many affordable housing have been built.	There is readily available information in the public domain to justify affordable housing need being high in this county. Strategic Housing publish information on the Council website on forth coming targets and what has been delivered in previous years. The Annual Monitoring Review provides a breakdown of house type provision set against Core Strategy Policy H3, 'Ensuring an appropriate range and mix of housing' and this is reported on every Winter.	No change
Border Oak	AH155	2.11-12	Attention should be given to the value of property shared ownership and whether this is fair to purchasers. Many examples of shared ownership properties being proportionally expensive, hard to sell and inflexible. 4.5 ratio for mortgage seems shocking and unrealistic? Where does 2.12 guidance come from?	Shared ownership units are assessed and allocated via the Help to Buy Agent 2 for West Midlands. They check eligibility and affordability. Help to Buy agents have been appointed by Government to administer affordable home ownership in England. The guidance referred to in 2.12 is from Homes England	No change
Border Oak	AH156	2.14	Tying costs to housing benefits seems counter intuitive - based on rental properties only? Home ownership is subsidised and presumably occupants need to be working to secure mortgage so housing benefits are not part of the finance equation? Service charges should be fair across the mixed development i.e. all houses pay the same regardless of being Shared ownership, social rent etc. This makes the community more balanced and reduces friction/conflict.	Service charges are applied to be reflective of affordability	No change
Border Oak	AH157	3.2	Complicated wording. Maybe use: 'Included but not limited to'. Change around list - registered providers first as this should be the main way we deliver affordable housing. NB 10 units plus under 1000m sq. would be small units and so could be considered affordable by virtue of size. Self and custom build exempt from affordable housing obligations - but some self-build could be made affordable housing. Specific policies should be written to support ASB.	The list is not seeking to rank any order. Self and custom build can be expanded upon further as the Core Strategy is taken forward. It is not within the scope of the SPD to make such changes. Changes to other paragraphs expand on affordable self-build housing	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Border Oak	AH158	3.5	3.5 strongly disagree. Very worrying - this cannot be an officer's jurisdiction - it is not subjective.	Paragraph 3.5 is required to ensure that applicants do not attempt to circumnavigate the planning system to avoid the delivery of affordable housing. Officers would consider the planning history of a site and how applications have been made to determine whether this part of the policy applies.	No change
Border Oak	AH159	3.7	Strongly disagree with the reliance on delivery through private development and the wording 'all'. Wrong tone, should depend on need and other factors. This method has been shown to be broken and unable to deliver.	This sentence is reiterating Core Strategy Policy H1 'Affordable housing - thresholds and targets'. This is how the council will respond to developments of this size. It is not aiming to be over reliant.	No change
Border Oak	AH160	3.8	3.8 The targets are based on out of date information, are excessive and unrealistic. Also don't represent the proportional need reducing as units are provided. As affordable housing stays affordable there will not be a need for continuous delivery of the same scale. Some villages already above proportional allocation required - Weobley, Canon Pyon, Kingsland, Orleton etc. each village should identify its own need. 40% for villages is ridiculous and puts people off delivering any homes- it cannot be delivered and be viable at 40%.	These targets are those set out in Core Strategy Policy H1 'Affordable housing - thresholds and targets'. When the Core Strategy is updated they will be subject to evaluation.	No change
Border Oak	AH161	3.11	Too vague and too open to misuse - Should have a cascade for each rural area first - should be means tested primarily (i.e. are they within the affordable housing financial need bracket) what about key workers from other areas - need to accommodate some influx of population but not too much so that social conflict arises.	Agree. Need to be clear on what is required to meet the criteria. The intention is that if applicants can meet one of the criteria then they are considered as acceptable.	Paragraph 3.11, after the sentence "In order to have a local connection a person must; Insert" meet one of the following criteria". and insert 'or' after the first two bullet points: <ul style="list-style-type: none">• live in Herefordshire; or• work in Herefordshire; or...
Border Oak	AH162	3.12	Very concerning - why no local test? Local test should be paramount unless there is a specific reason why not.	This is Government policy not local policy	no change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Border Oak	AH163	3.13	3.13 need to be clear that affordable housing should be raised up to market design standards and not market housing brought down. Affordable housing should be exemplar. Very disappointed with the standard of affordable housing in Herefordshire, it is ubiquitous, soulless, unsustainable, ugly, rarely suited to the vocal area, obvious to tell it is affordable housing, no consideration for community or changing lifetimes. Limited planting, open space, based on urban estate formatting etc. We need to really set the bar high though policy guidance so that we can lift expectations and improve quality of end product.	Core Strategy policies SD1 -Sustainable design and energy efficiency, SD3 -Sustainable water management and water resources, SD4 -Waste water treatment and river water quality, LD1 - Landscape and townscape, LD2 -Biodiversity and geodiversity, LD3 - Green infrastructure and LD4 Historic environment and heritage assets all have elements within them to achieve sustainable development. They aim to protect the environment by delivering well designed places, spaces and buildings, which use land efficiently, reinforce local distinctiveness and are supported by the necessary infrastructure including green infrastructure. Development Management officers work with developers to ensure that there is no difference between the appearance of affordable and open market units. Core Strategy Policy H3 – ‘Ensuring an appropriate range and mix of housing’ requires the local planning authority to require a range and mix of housing units which can contribute to the creation of a balanced and mixed communities. The council are in the process of producing a revised Housing Market Area Needs Assessment (HMANA) which will set out the latest need for housing mix and type, both affordable and open market, in the county.	Insert amendment to paragraph 3.15 last sentence, which states '...it should not be possible to ascertain any difference between the different tenures in any one scheme' to ...'it should not be possible to ascertain any difference between open market and affordable housing nor between the different tenures in any one scheme'.
Border Oak	AH164	3.14	Incorrect to say this - very divisive. No evidence to suggest that those in open market houses are under capacity. Or that affordable housing are occupied to capacity. It is often the registered providers who provide too many small homes.	Census data sets out this evidence.	No change
Border Oak	AH165	3.15	Need to explain how innovation will be promoted and encouraged. What is expected of designer and builders of affordable housing? Needs addressing on mixed schemes but especially on only affordable housing schemes.	Both NPPF, Core Strategy and NDP policies encourage designs that are both innovative and cohesive with their environments. The Council is in the process of producing a Sustainable Building Standards SPD which will assist in decisions relating to design.	No change
Border Oak	AH166		Most of our thoughts are included in the previous question - but we would like the opportunity to work with the council on this in a more inclusive way and to communicate an alternative perspective that has been overlooked. We also urge HC to look at modern, innovative, sustainable affordable housing schemes delivered elsewhere to get a better understanding of what is possible.	Noted and consultation on the Sustainable Building Standards SPD will enable this opportunity in the coming months.	No change

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Phillip Howells	AH167		Although after careful consideration I felt able to answer yes to questions, I don't think it is particular well written or easy to grasp some of the technical information. A tabular form for the different type of affordable housing and especially showing calculation options would make it easier to understand,	The different affordable housing products are within Appendix 3.	Appendix 3 is technical data which will be revised and updated annually. Amendments have been made to the definitions on <i>Low Cost Housing</i> and <i>Rent to buy</i> as well as the insertion of table 1 setting out affordable house prices and earnings.
Phillip Howells	AH168		SPD is a hostage to fortune quoting specific individual names for the preferred developers since these are almost certain to change to some degree during the applicability of the SPD. More generic contact info would probably make more sense	The organisations on the preferred partner list are the current organisations that wish to develop in Herefordshire. Applications are welcome from other organisations that wish to become a preferred partner at any point.	No change
David Olivier	AH169		Disagrees with the current market intervention to deliver affordable housing.	The Supplementary Planning Document (SPD) needs to elaborate further on the Council's ambitions. The Council is committed to addressing housing need in a number of ways. The County Plan 2020-2024 ambition is to build publicly owned sustainable and affordable houses and bring empty properties back into use. Decisions and plans to progress this are already underway. Homes England funding is also helping to bring 100% affordable sites forward. Add further text to elaborate on this.	Insert text after last sentence at Paragraph 1.2. 'The County Plan states that the Council will work with housing associations and developers to enable them to build more homes for sale and for long-term rent. In order to drive the delivery of affordable housing, the council will look to develop its own housing stock to provide over 1,000 additional genuinely affordable homes for local people in Herefordshire. Sites with 100% affordable housing are being funded by Homes England and being brought forward through the planning system'.
Natural Resources Wales	AH170		Thank you for contacting Natural Resources Wales (NRW). Unfortunately this planning is based in England and therefore not within our remit.	N/A	No change required
Additional changes	AH171	1.1		Extra text for clarity.	At the end of first sentence add "to meet the identified housing needs of the County". The purpose of this Supplementary Planning Document (SPD) is to assist the Council in meeting its objective of delivering affordable housing to meet the identified housing needs of the County.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Additional changes	AH172	1.18		Paragraph 1.18 would be better placed in the Introduction section as it sets out the limitations of the document.	Move paragraph 1.18 to follow after paragraph 1.2 "This SPD will guide development in affordable housing and how planning obligations are managed in planning applications. It is not an opportunity to make changes to policies within the existing core strategy e.g. any changes on climate change and design will need to be addressed in the updated strategy".
Additional changes	AH173	3.34		Place paragraph 3.34 at the beginning of the Self and Custom build section. It sets out the definition from the start.	Move paragraph 3.34 to the start of this section, 'Self-build and custom-build housing: is defined in the NPPF as "Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.'
Additional changes	AH174	3.33		Reword paragraph 3.33 for better clarity and provide more information on the approach to community groups bringing forward self-build as affordable housing.	Update paragraph 3.33 as follows 'Self and custom build housing is an important element of the Government's housing strategy because it can contribute towards diversity in housing delivery and economic growth. The Government therefore wants to see an increase in the number of available plots for self and custom building. The Core Strategy was close to adoption when the Self and Custom Build Housing Act was passed. Therefore it does not include any policies on this matter although there are textual references to it. It intends to address this matter in the update of the Core Strategy. Nevertheless the council recognises that self-build housing provides individuals and groups with the opportunity to gain lower cost home ownership with it being subsidised. However there is potential for formal affordable self-build housing to be delivered as community self-build schemes. These involve groups of local people in housing need, building homes for themselves usually as part of a Community Land Trust or Community Led Housing Group. In these cases the assets remain in the ownership of the local community group as affordable homes'.

Organisation / individual name	Reference	Paragraph (if applicable)	Summary of response	Council response	Proposed change
Additional changes	AH175	Appendix 3		Some updates and amendments to Appendix 3	Appendix 3 is technical data which will be revised and updated annually. Amendments have been made to the definitions on <i>Low Cost Housing</i> and <i>Rent to buy</i> as well as the insertion of table 1 setting out affordable house prices and earnings.