

DRAFT INTERIM PLANNING GUIDANCE ON AFFORDABLE HOUSING CONSULTATION STATEMENT

Targeted Consultation

The Interim Planning Guidance (IPG) on affordable housing was approved for the purposes of consultation by the Implementation Executive for Shropshire Council on 3 February 2009. A six week consultation period followed, 16 March – 27 April 2009, in which the following were consulted:

Publicly available

- ❖ Copies in all local libraries (22 branches + 7 mobile libraries)
- ❖ Available on the Shropshire Council website, under both Planning and Housing pages
- ❖ Available in reception at the Council offices across Shropshire
- ❖ Hard copies dispatched on request to individuals

Local Partners

- ❖ All Shropshire Parish Councils (169)
- ❖ All Registered Social Landlords (RSLs) active in Shropshire (19)
- ❖ Developers and their agents (137)
- ❖ Shropshire Partnership
- ❖ Campaign to Protect Rural England
- ❖ National Farmers Union, Telford
- ❖ Defence Estates, Shrewsbury
- ❖ Shropshire Fire Service
- ❖ South Shropshire Youth Forum

Internal consultees

- ❖ All development control officers in the five district council areas
- ❖ Housing officers
- ❖ Legal officers
- ❖ All Members of the Implementation Executive

Statutory consultees

- ❖ Government Office for the West Midlands
- ❖ West Midlands Regional Assembly
- ❖ Homes & Communities Agency
- ❖ Environment Agency
- ❖ Natural England
- ❖ Neighbouring local authorities (Telford & Wrekin; South Staffordshire; Wye Forest; Malvern Hills; Worcestershire; Herefordshire; Powys; Wrexham; West Cheshire; East Cheshire)

Stakeholder meetings

The IPG was discussed as an agenda item and circulated at the following meetings:

- ❖ 24 February Housing developers' stakeholders' meeting
- ❖ 5 March Round table financial discussion with finance brokers & developers
- ❖ 12 March West Housing Market Area Partnership
- ❖ 20 April Shropshire RSL Developers Sub-Group
- ❖ 24 April Meeting with developer and RSL representatives to discuss points raised further

Other meetings

- ❖ 18 March discussion with legal team
- ❖ 5 April discussion with Shropshire Development Management Officers Group

The Government Response to the Taylor Review of the Rural Economy and Affordable Housing

During the consultation period, the Government published its response to the Matthew Taylor review of the Rural Economy and Affordable Housing (July 2008). The draft Shropshire Interim Planning Guidance on Affordable Housing is in accordance with the Government's approach, as outlined in its response to the Taylor Review.

Regarding exceptions sites in the smallest settlements, the Government's Response acknowledges that, "there may be some very small settlements where it might on examination be inappropriate to add even one or two new houses, but we nevertheless expect authorities to look

hard at that possibility and consider proposals from the local community for additional housing rather than rejecting it out of hand.” (paragraph 50). The IPG’s approach accords with this approach, allowing exception sites in the majority of small settlements across Shropshire.

The Government agrees with Matthew Taylor’s recommendations to allow landowners to have nomination rights for affordable housing units, for example to nominate a family member or employee (who meet the local connections and housing need criteria) rather than insisting solely on RSL and local authority selection procedures. Shropshire council has hands on experience of dealing with such cases and additionally the IPG’s approach to single plot exceptions sites allows landowners further flexibility.

The Government also cautiously accepts Matthew Taylor’s recommendation that landowners should be able to retain some interest or income from the release of land for affordable housing, providing the terms (for example, rate of ground rent, etc) are acceptable, and do not undermine affordability. The Government considers “now is the time to show a degree of flexibility to encourage and incentivise landowners to come forward to provide land for rural exception sites” whilst clarifying that this does not extend to allowing market housing to be built on exceptions sites. Again Shropshire council has experience of such negotiated outcomes and while not advocating this model, the IPG does not preclude it, providing the homes are affordable in perpetuity. Appendix E of the IPG defines a wide range of affordable housing options that would be acceptable, some of which allow continuing landowner interest.

Sustainability Appraisal

A sustainability appraisal of the consultation draft IPG was published in March 2009, a copy of which has been available on the Council's website. The sustainability appraisal assessed the proposals in the draft interim planning guidance against 18 sustainability objectives. These sustainability objectives were developed by the Council in 2008 as a means of appraising the Shropshire Local Development Framework (see the Shropshire Sustainability Appraisal Scoping Report published for consultation in July 2008, available at www.shropshire.gov.uk/planning.nsf).

The draft IPG scores positively against many sustainability objectives (for the reasons given), including:

SO2: Provide a sufficient quantity of good quality housing, which meets the needs of all sections of society (by allowing exceptions of different types of affordable housing)

SO3: Promote a strong and sustainable economy throughout Shropshire (by providing homes for the local workforce)

SO7: Promote community participation in a diverse range of sporting, recreational and cultural activities (by requiring affordable homes to meet open space policies)

- SO9: Reduce Shropshire's contribution to climate change (by requiring affordable homes to meet energy and water saving requirements of Code level 3)
- SO10: Adapt to the impacts of climate change (by requiring affordable homes to meet energy and water saving requirements of Code level 3)
- SO11: Protect, enhance and manage Shropshire's landscapes and townscapes (focus on ensuring harmony with the character and appearance of the local area)
- SO12: Preserve and enhance features of historical importance (by ensuring exception sites will not be developed where they would harm conservation areas or the setting of listed buildings)
- SO14: Protect and enhance Shropshire's water resources (by requiring affordable homes to meet water saving requirements of Code level 3)
- SO16: Reduce the risk of flooding to people, property and wildlife (by emphasising the importance of developments not being subject to flood risk)

Overall, the sustainability appraisal found that the draft interim planning guidance contributes positively to a range of economic, social and environmental objectives, and has a neutral impact for many others. The only negative impacts were against SO5: Encourage a modal shift towards more sustainable forms of transport (as exception sites are not necessarily served by alternatives to the car) and SO17: Ensure the efficient use of land (as exception sites are largely on greenfield land). Taken as a whole the IPG was considered sustainable in its aims and content, and no changes to it were suggested by the sustainability appraisal.



Are you, or someone you know, struggling to find a home you can afford? Could building your own affordable house be the answer?

The Interim Planning Guidance (IPG) on Affordable Housing allows an exception to be made to normal planning policies in certain circumstances. Its aim is to enable local people to build themselves an affordable home.

The Interim Planning Guidance (IPG) is currently in draft form. We want your comments, whether in support or in opposition.

A reference copy of the draft Interim Planning Guidance (IPG) is available in this library. If you would like a copy posted or emailed to you, please telephone 01743 281316.

Consultation closes on 27 April 2009.

APPENDIX 2: RESPONDENTS

Respondent Ref	Organisation
1	Shropshire Rural Housing Association
2	Diddlebury Parish Council
3	Hereford Diocesan Board of Finance Glebe Committee
4	Conover Parish Council
5	Bridgnorth District Council
6	Defence Estates
7	Shropshire Fire & Rescue Service
8	Environment Agency
9	Hodnet Parish Council
10	Mr A Dingwall
11	Bishops Castle Community Land Trust
12	Galliers Homes Ltd
13	Ashford Bowdler Parish Meeting
14	Farlow Parish Council
15	Councillor James Gibson (Church Stretton)
16	Wem Town Council
17	Prees Parish Council
18	CPRE
19	Shropshire Homes
20	Broseley Town Council
21	Mr D Gomersall
22	Mr P Richards
23	Worthen with Shelve Parish Council
24	Stottesdon and Sidbury Parish Council
25	Turnbull Tweedale
26	Hadnall Parish Council
27	Church Stretton Parish Council
28	Taylor Wimpey UK
29	Natural England
30	West Midlands RSL Planning Consortium (representing Accord Housing Association (HA), Beth Johnson HA, Bromford Housing Group, Marches HA, Mercian HA, Midland Heart HA, South Shropshire HA, South Staffordshire HA, West Mercia Housing Group)

31 Ludlow 21
32 Severnside Housing
33

Internal consultees

I-101 Development Management Officers
I-102 Development Management Officers Group (DMOG)
I-103 Legal Officers
I-104 Recent enquiries re specific sites

APPENDIX 3: SUMMARY OF RESPONSES

General comments

Ref	Respondent	Summary of Comment	Action
2	Diddlebury Parish Council	Pleased to see that the (IPG) broadly follow the policies of the former South Shropshire District Council, which they broadly supported. Also pleased, however, to see that it is proposed that some of the rigidities in that policy, eg. fixed percentages of affordable houses be abandoned.	Support noted. Support for removal of rigid percentages is noted.
3	Hereford Diocese	The IPG is very much welcomed and further engagement between the LPA and the Diocesan Board would be appreciated in order to explore how some of the landholdings in rural settlements might be brought forward, providing for balanced development to strengthen and support rural communities in Shropshire.	Support noted. The LDF process will provide an ideal opportunity for the LPA to work closely with the Diocese on potential sites for allocation.
4	Condover Parish Council	Agricultural ties to properties should not be allowed to be easily removed where there is a recognised need for agricultural employment and housing.	Noted; relevant to the forthcoming LDF rather than this IPG. The option to consider placing a secondary clause on permissions for Agricultural workers to permit future use for affordable housing should the initial business case no longer exist in the future can be considered as part of the LDF.
4	Condover Parish Council	In recent years the Parish has seen a huge increase in the number of holiday let properties within its community, many of which are occupied on average for 40% of the year. It is the expressed view of the Council that such properties should be encouraged to be converted (via their change of use) to local rental affordable housing, as they are already in existence and provide a more immediate solution. This should be incorporated into the IPG as an opportunity to accomplish this.	The option to consider placing a secondary clause on permissions for holiday accommodation to permit future use for affordable housing should the initial business case no longer exist in the future can be considered as part of the LDF.
7	Shropshire Fire and Rescue Service (SFRS)	SFRS is supportive of the spirit of the proposals not least because many of its retained part-time officers are low wage/high property cost victims. The inevitable migration of young people to the larger towns makes it very difficult for SFRS to recruit suitable firefighters to provide vital fire cover for these communities.	Support noted.

		<p>Clearly the more remote a property is the longer it takes the Fire Service to attend should a fire occur. Additionally fire fighting water supplies may be limited and in such circumstances we would want to find some compromise such as an engineered solution which provides the occupants and property with suitable fire protection. Obviously we would not want to conflict with the spirit of the 'affordability' issue but at the same time we should consider whether the developer rather than the rate payer should contribute towards the added costs?</p> <p>The SFRS is now required to focus upon reducing road accidents and other emergencies. We would urge that this consideration forms a default aspect of the analysis for approval. Similarly issues such as flooding etc.</p>	<p>This aspect of building design needs to be discussed by officers further with the fire service, with regard to <i>all</i> rural properties, and if appropriate included in the design policies in the Local Development Framework.</p> <p>The additional cost that this may impose on affordable properties needs to be debated further through the Local Development Framework process.</p> <p>The design and layout requirements detailed in the Interim Planning Guidance are "<i>in addition</i> to adopted policies". The normal Local Plan policies relating to highway safety, flooding, etc still apply. The "exception" aspect relates to strategic policy (settlement strategy) rather than to detailed design requirements.</p>
8	Environment Agency	<p>Need to include in the sustainability criteria for exception sites a reference to providing an effective means of foul drainage without causing harm to the environment (eg by pollution of ground water and habitat). Sites should also meet the requirements of PPS25 with regard to flood risk and PPS23 with regard to pollution control and remediation.</p>	<p>Normal planning policies with regard to flood risk, sustainable drainage and pollution mitigation apply to all sites, including exception sites. The IPG has been amended to clarify that the "exception" made in the case of affordable housing relates to settlement strategy and not other aspects of siting and design (such as avoiding land at risk of flooding).</p>
9	Hodnet Parish Council	<p>Emphasise the need for careful consideration of who is allocated to live in affordable housing, to avoid repetition of problems experienced locally with nuisance tenants causing problems for neighbours, including problems for a neighbouring sheltered accommodation scheme. Although one family has been moved out of the area through enforcement, there is still the threat of trouble from existing anti-social families.</p>	<p>The interim planning guidance requires applicants for housing on exception schemes to have strong local connections (original paragraphs 2.1 and 3.7). The single plot exceptions sites will be occupied by their owners, and larger exception sites developed by RSLs will be subject to tenant management by experienced RSL staff. However, it is not possible to guarantee that occupants will be good neighbours, any more than it is possible to guarantee good neighbours in normal market housing.</p>

13	Wem Town Council	There should be proven local need for affordable housing, particularly on 'exception sites'. Such developments also need to be sustainable. How will exceptions sites be viewed by local people when there are half finished building sites elsewhere?	The chronic need for affordable housing across Shropshire is now so great that needs assessments at parish level, while useful, are not a pre-requisite. The degree of need is such that the call to 'prove' local need is increasingly seen as a delaying tactic rather than a genuine concern. Many market housing developments have come to a halt in the current economic climate, but this does not indicate a lack of need for housing. On the contrary, the number of households in housing difficulty, in need of affordable housing, is increasing. Exceptions sites can provide affordable housing because their land values are low, whereas existing construction sites, purchased in a strong market, cannot afford to provide housing at less than market value.
15	Cllr James Gibson	The draft policy does not necessarily address the needs of farmers. There is a need to accommodate multiple generations, and to provide housing for farm workers who may be required to provide assistance to more elderly farmers.	The single plot exceptions sites part of the IPG would apply equally to farmers as to other local people. As farmers have land, it should be straightforward for them to benefit from the IPG. The IPG would require the property to be affordable in perpetuity, which will benefit future generations. Alternatively, farmers can apply under existing Local Plan policies for an agricultural workers dwelling, which is restricted by planning condition to occupancy by farm workers. The option to consider placing a secondary clause on permissions for Agricultural workers to permit future use for affordable housing should the initial business case no longer exist in the future can be considered as part of the LDF.
17	Prees Parish Council	The IPG is being brought in too quickly without proper consideration. The IPG seeks to combine all aspects of planning policy on affordable housing currently in force within the former respective Borough / District Council areas, thereby affording the widest of collective parameters across the County. This amounts to a lowering of the bar by a significant margin, and would create a far more relaxed regime than might be warranted or even desirable in some areas and a position which might be difficult to step back	The IPG does propose some significant relaxation of policies in those parts of Shropshire where existing policies are tighter with regard to affordable housing. The reasons for the policy, and the urgency which has led to it being developed in advance of the Core Strategy, are elaborated in part one of the IPG. In summary, the extent and severity of the lack of affordable housing calls for urgent and radical action, which cannot wait until the Core Strategy has completed its lengthy statutory process.

		<p>from.</p> <p>Surely the Core Strategy is the appropriate mechanism to review existing Local Plan policies.</p> <p>Prees Parish Council feels most strongly that the best IPG would be to continue to utilise the existing saved planning policies within the five Borough / District areas, particularly since these areas will continue to provide the geographical focus for individual planning applications and approvals.</p> <p>It is also felt that this is of sufficient importance to be considered by the newly elected Shropshire Council rather than by the Implementation Executive.</p>	<p>The IPG will have a short life, being replaced by the Core Strategy in due course (Core Strategy adoption expected 2011). The IPG has been amended to make it clearer that the existing saved planning policies continue to have weight, but that the IPG is an additional, up-to-date consideration that reflects PPG3, the Matthew Taylor Report, the 2008 evidence base, the impact of the credit crunch and the Shropshire Housing Strategy 2009.</p> <p>The final IPG will now be considered by the newly elected Shropshire Council.</p>
20	Broseley Town Council	Housing is an important local issue and the Town Council is pleased that the new Council will be making this a priority.	Support noted.
23	Worthen with Shelve Parish Council	The IPG is both comprehensive and over complicated.	Improvements have been made to the structure, order and layout of the IPG.
23	Worthen with Shelve Parish Council	There should be no speculative building of affordable housing - only build for individual known requirements.	It is not feasible for housing associations to only build for individual households, but neither do they build speculatively – there is ample evidence of chronic need.
23	Worthen with Shelve Parish Council	There is an abundant supply of reasonably priced property in Shropshire for rent or purchase with a small subsidy from the Council or Housing Associations these could be available for people looking for affordable housing.	Housing Benefit provides financial subsidy for some households in need of affordable housing to rent privately. However, the evidence shows that need for housing at an affordable level far outstrips supply. The IPG also allows for a range of affordable housing tenures, not just rental.

25	Turnbull Tweedale	<p>Turnbull Tweedale would like to stress the fact that from a developer's point of view, it is apparent that the housing industry began to decline and had collapsed before a recession had become known, largely due to the increasing number of constraints on development. Affordable housing requirements and contributions to education, highways, etc results in housing developments becoming unviable, which threatens the overall housing provision targets, and leaves many sites "mothballed".</p> <p>There is also a problem with the provision of affordable housing through RSLs, due to their requirements for high design (Code level 3) and space standards.</p> <p>Bearing these aspects in to mind it is important that affordable housing is deliverable and that the policies related to affordable housing are realistic and work. The adoption of this Interim Planning Guidance should provide more 'flexibility' in the delivery of affordable housing, as suggested throughout the document. This will be a positive step forward as current affordable housing policies are too restrictive.</p>	<p>The collapse of the housing market is due to many factors, and the Council does not accept that "constraints on development" was the key cause of the current situation. It is however agreed that that more flexibility is required in order to increase the delivery of affordable homes.</p> <p>Consequently, development viability is key to the approach to negotiations for affordable housing on open market developments contained in part five of the IPG.</p>
26	Hadnall Parish Council	<p>We would ask that local Parish Councils are involved to a much larger extent, particularly with respect to the s106 agreement. For example, over the ratio of shared equity and rented accommodation. Proper consultation should be made over the s106 agreement in its entirety.</p>	<p>The timing of section 106 agreements makes it difficult to involve Parish Councils, except as part of the standard process of consulting the Parish Council on the application. It is therefore incumbent on the Parish Council to make its views clear to Shropshire Council when it comments on the planning application. The Parish Council can also be proactive in its involvement in the scheme, actively engaging with the developer, Registered Provider and Shropshire Council on matters of particular concern to the Parish Council. The final s106 agreement should reflect policy, evidence of local needs (such as a local needs survey) and financial viability considerations, with limited room for manoeuvre to accommodate external parties.</p>
26	Hadnall Parish Council	<p>Despite carrying out two housing surveys of our own, we were assured there was a considerable need that far exceeded our own figures. In the event this presumed need was proved entirely wrong – none of the 10 shared equity homes have candidates from our Parish, and only one of the</p>	<p>Comments noted. The IPG aims to provide affordable housing sites in more communities, thus enabling provision to match local need. (Local need includes people who do not currently live in the area, but who work or have family there.)</p>

		rented homes has been offered to a local person. If a need exists in other Parishes, then it is there that homes should be built.	
26	Hadnall Parish Council	Housing Association rules were discriminatory in favour of young families. Our population is ageing and although we appreciate the need to retain families in the community there is a much more pressing need to accommodate the older and perhaps infirm members of our community, which in effect would release family homes.	On exception sites the IPG prioritises local people, overriding housing associations' normal allocation policies (paragraph 3.7 of the draft). Furthermore, on single plot exception sites downsizing is allowed, which makes many older people eligible for "affordable" housing. On mixed developments, however, normal allocation policies apply, with their emphasis on greatest need rather than on local connection.
26	Hadnall Parish Council	We intend to update our housing need surveys to reinforce the points made above.	Parish Councils' needs survey are a very helpful evidence base of local need, and work on them is welcomed.
26	Hadnall Parish Council	Experience of the Chapel Road development leads the Parish Council to strongly urge that statutory consultees be held to account when flooding occurs.	Flooding concerns noted. Normal planning considerations (including flooding) should apply to all housing, including affordable schemes, and revisions to the IPG make this clearer.
27	Church Stretton Parish Council	Applauds the overall purpose of the IPG. In line with the recent national report on Rural Housing by Matthew Taylor, backs a "core and cluster" model that links market towns and their surrounding rural villages, so that together they begin to form sustainable local communities. This is particularly apposite to Church Stretton where there remains limited land outside of the flood plain in the valley to accommodate further development but new residents in surrounding villages could make those settlements more viable.	The IPG recognises that the availability of services and facilities in a nearby settlement are relevant to the suitability of a site for affordable housing. The IPG has been revised to emphasise this inter- relationship
27	Church Stretton Parish Council	The outmoded infrastructure of the town, especially its drains and sewers, are now overstretched. Accordingly, the Town Council opposes any further developments until those infrastructure deficiencies have been remedied. This Guidance is deficient in not making reference to the necessary precondition of investment in infrastructure upgrading. The guidance should require section 106 "community gain" monies to be reinvested in the community of that development.	Comments on infrastructure in Church Stretton have been noted for the Local Development Framework. Section 106 agreements are governed by national policy, which require contributions to be fairly and reasonably related to the development.

27	Church Stretton Parish Council	In the medium to long term, the Town Council accepts that it will require a further admixture of more affordable housing. It is essential, in the first instance, that statistics of local housing need are widely circulated. With accurate figures it would be possible to set targets for gradual year-on-year expansion that would readily allow for assimilation, thus avoiding the recent "famine and feast scenario" of no affordable housing for 16 years, followed by a glut of some 120 homes in recent years.	The Shropshire-wide Choice Based Lettings (CBL) scheme for housing association properties that is due to commence in July 2009 should provide an accurate and constant source of data on the demand and need for affordable homes in each settlement across Shropshire. We hope to provide annual updates of the Strategic Housing Market Assessment, incorporating CBL data on local housing needs. The ambition to have a regular supply of small scale affordable housing developments is shared by Shropshire Council. The IPG should help achieve this, particularly in supporting affordable housing to be provided in smaller communities where the need arises but relying upon settlements such as Church Stretton for some services.
27	Church Stretton Parish Council	Due weight should be given to the representations of Town and Parish Councils. In similar vein, due account should be given to local Design Statements.	Town and Parish Councils are consulted on every planning application. The IPG requires applicants for single plot exceptions sites to be proactive in obtaining the support of their town or parish council in determining their local connection. Explicit reference has also been added referring to local design statements and parish plans.
27	Church Stretton Parish Council	We hope that representations to the Homes and Communities Agency are successful in securing the flexibility to rent out affordable homes, built for shared equity, that are now standing empty for want of securing mortgages. Clauses in the guidance that promote such flexibility would be sensible in the current circumstances.	Support for the flexibility in the IPG (paragraph 3.6 in particular) is noted.
31	Ludlow 21	Affordable housing in rural areas must always be balanced by an adequate provision of locally available employment, and therefore clearly sustainable in the longer term. It should serve a genuine local need, not the unsustainable inward drift into remote rural areas. The focus should be long term sustainability, and the protection of a healthy natural environment within which sustainable communities can evolve. The above points should be given priority and clearly stated in the Planning Guidance.	The IPG seeks to enable local people and those who work in rural areas to be able to afford to live there creating and maintaining a balanced social economy without harm to the natural environment

32	Sevenside Housing	The overall document is a very positive step forward and my interpretation of its 'spirit' is one of openness and flexibility that should lead to consistency and streamlining of affordable housing development with the aid of the Council's new 'Enabling Officers'. Need to guard against officers have different interpretations e.g. the negotiation of the split between affordable housing and out right sales for section 106 sites.	Support noted.
32	Sevenside Housing	Further housing needs assessments and or updates are required to help fast track affordable housing development, especially in rural areas.	A programme of work to provide detailed information on local housing needs is underway with a range of providers including Housing Associations playing a crucial role in that process.
I-102	DMOG	Perhaps consider a two-tier system for remote and less remote areas, with different settlement patterns. Also need to consider if affordable developments are coming forward in some settlements and hence additional affordable is unnecessary. Provide in most sustainable location, where possible. Timescale and urgency of housing will have to be considered.	A two tier system would undermine the rationale of having an IPG to provide a consistent, Shropshire-wide approach. The IPG clearly identifies larger settlements as more appropriate to accommodate grouped housing schemes and smaller settlements being more appropriate to meet locally arising need only and not that which should be met within larger (over 3,000) settlements

Chapter 1: Introduction

Ref	Respondent	Summary of Comment	Action
1	Shropshire Rural Housing Association	There must be a very robust linkage between affordable housing targets in the LDF and demonstrable need.	The LDF will be based on a robust evidence base.
1	Shropshire Rural Housing Association	There should be provision for local input via Parish Councils into the LDF Site Allocations and Development Management DPD, which will include the allocation of sites for 100% affordable housing.	The statutory LDF process provides ample opportunity for local input.
3	Hereford Diocese	The Diocesan Board has an interest in encouraging and, where appropriate, facilitating the provision of affordable housing for local people through its land holdings. The overall emphasis and tone of the draft IPG is very much appreciated. The sense of urgency and the recognition of the need to respond positively to the high levels of housing need within Shropshire should be applauded. The concentration upon finding ways to encourage provision and to	Support noted. This offer of more proactive engagement in affordable housing provision will be pursued.

		make things happen 'on the ground' rather than simply aiming to produce policy for its own sake is to be commended.	
4	Condover Parish Council	Affordable homes should be made available in the first instance to local people and their families within the parish in order to meet local housing needs and sustain local communities.	The IPG does this, for single plot exception sites, for larger exception sites and for affordable homes on market developments, through a section 106 agreement.
4	Condover Parish Council	Where affordable homes are provided and their aggregate number effectively cannot be sustained at an acceptable level by the existing local infrastructure, local investment will be required from Shropshire Council to ensure services within the local community are improved to meet this additional demand. This should be considered and planned for when the planning application is registered with the principal authority.	Affordable homes will have to meet normal drainage, highway safety and access standards, in accordance with standard Local Plan policies. However, to require it to be matched in all cases by a 'wish list' of other infrastructure would place an impossible burden on Shropshire Council and simply result in preventing the provision of affordable housing. Generally a small number of affordable homes is inadequate to justify the provision of a primary school, bus service or other facilities. However, such homes will assist in making the local community more sustainable. It should be noted that the provision of affordable housing is itself considered by Government to be part of social infrastructure.
5	Bridgnorth District Council	The new Council will have to have regard to both existing and new policies. In some cases there may be a clear conflict between the two. The section covering the status of the guidance (1.19) should mention that national guidance and statutory development plans have more weight at appeal.	The Council will choose to apply the Interim Planning Guidance in preference to the adopted Local Plan policies, as the former is more up-to-date and provides a consistent approach across the new unitary Council's area. Nevertheless, this does not in any way reduce the weight of adopted Local Plan policies and the paragraph has been amended to clarify this.
5	Bridgnorth District Council	The rationale behind the new guidance is rather unclear in places and would benefit from further explanation, for example paragraph 1.4 does not explain what the "tensions" referred to are, and in	Paragraphs 1.4 and 1.14 amended to clarify.

		paragraph 1.14 what the “problems” referred to are.	
I-102	Development Management Officers Group (DMOG)	Need to clarify the status of the IPG, particularly for cases where there may be tension with adopted Local Plan policies.	‘Status of guidance’ section amended accordingly.
I-101	Ian Kilby	With regard to the layout, suggest that the ‘status of the guidance’ is brought to the beginning.	‘Status of guidance’ section moved to beginning.
11	Bishops Castle Community Land Trust	Overall welcomes the very positive tone of the policy. However, it assumes that RSLs are the only route to providing affordable, social rented or intermediate homes. CLT's are not mentioned at all and the IPG should correct this key omission. The CLT asks that words similar to the following be added to the most relevant section of the policy.	Support noted. An adaptation of the suggested wording has been added to section 3, referring to the important role that community land trusts can play in engaging local communities. The Bishops Castle Community Land Trust has been added to the list of partners in the model s106 agreement.
12	Galliers Homes Ltd	Queries the allocation of 100% affordable sites (paragraph 1.17), which does not appear to be limited to small exception sites. How can it be regarded as acceptable in view of the clearly stated aim of PPS3 to encourage the creation of mixed communities with a variety of housing, particularly in terms of tenure and price?	Although allocating exception sites may seem a contradiction in terms, there are some cases where to do so would provide certainty for the developer, RSL / Community Land Trust and local community. PPS3 requires all exceptions sites to be 100% affordable. They contribute to mixed communities by increasing the stock of affordable houses, often in villages that currently have very little affordable housing. Although the difficulties of the current lending market are noted in respect of shared ownership housing, it remains the case that even on 100% affordable exception sites a range of housing tenures within the “affordable “ definition can be provided.
25	Turnbull Tweedale	Exception sites are defined as areas where open market housing would not get permission, however surely for larger schemes, a certain level of open market housing is needed to subsidise the affordable housing?	It is indeed difficult to build affordable housing without some subsidy, and grant or family subsidy is usually required. National planning policy in PPS3 requires exceptions sites to be solely for affordable housing, and this position is strongly confirmed by the government’s recent response to the Taylor Review.
25	Turnbull	At paragraph 1.6 (and in other parts of the document) there is	Support noted. Explicit cross-reference to the

	Tweedale	mention of a need for flexibility, which is a positive approach. We would suggest that the result of a recent affordable housing viability study by Fordham should be incorporated.	Fordham viability study has been added to paragraph 5.20.
25	Turnbull Tweedale	Are all private shorthold tenancy properties included in the housing needs figure?	No, households are not automatically in housing need if they are in shorthold tenancy properties. Housing need is based on financial ability to afford suitable housing for the household's needs.
28	Taylor Wimpey UK	The draft IPG only states the effects of the "credit crunch" as a reason for the adoption of a more flexible approach. Suggest also referring to economic viability and the availability of finance for affordable housing.	The economic viability of developments is referred to in some detail later in the IPG (draft paragraphs 5.20 – 5.23).
28	Taylor Wimpey UK	Paragraph 1.9 is inaccurate as Appendix G demonstrates an increase in the number of people who cannot afford to buy the cheapest accommodation available in Shropshire, not an increased need for affordable rented accommodation. Would like to encourage a range of tenures that could assist meeting the need.	This section has been amended accordingly.
28	Taylor Wimpey UK	The figures in bullet point 6 do not take any account of any duplication in the number of households becoming homeless that may already be included in the 939 newly formed households.	The figures were obtained by following government guidance on best practice in assessing need. We accept that the methodology has limitations, and that there will be some double-counting, as well as under-counting in other areas (notably households falling into need who do not qualify as 'unintentionally homeless and in priority need' but who nevertheless are paying more than they can afford for housing).
28	Taylor Wimpey UK	Recommend that paragraph 1.19 is expanded to confirm that the IPG is a 'guide' rather than a policy document in its own right and it should therefore only be afforded weight as such.	A new section has been added to the beginning of the IPG to clarify the weight it should be afforded. However by and large the IPG seeks to introduce more flexibility than existing policy, which has been welcomed by the development industry.
30	West Midlands RSL Planning Consortium	We strongly support the Council's intention to increase affordable housing throughout Shropshire; the recognition of the high level of need should be clear throughout this guidance. There should be strong links with the LDF, ensuring consistency in approach. In so doing, the Council should have regard to the Government's response to the Taylor Review. We are strongly supportive of the general approach taken to the	Support noted.

		need for affordable housing and note the recognition of various publications and policy documents which strongly endorse this approach.	
31	Ludlow 21	Paragraph 1.4 minimises the causes of environmental impact and its significance in relation to Climate Change. It is now accepted that environmental damage is a huge problem that threatens our existence. Compromise on our future sustainability should definitely not be promoted as new thinking.	The IPG seeks to strike the right balance between social and environmental concerns. This paragraph has been amended to clarify that environmental concerns are not considered defunct.
31	Ludlow 21	Query 'flexibility' in relation to the credit crunch. What does this mean? Hopefully it doesn't mean allowing compromises on sustainability principles. These may seem expensive for short term developer profits, but are intended to benefit society in the long term. To allow 'flexibility' of sustainability principles is to compromise our future.	The flexibility referred to relates to the proportion of affordable housing on open market developments. The IPG's approach is to lower the proportion of affordable housing required if the developer can demonstrate, through 'open book accounting', that the development is otherwise not viable. This approach secures affordable housing where otherwise no development would occur. It does not compromise sustainability principles.
31	Ludlow 21	The 'need for realism' in paragraph 1.11 is vague, what do you really mean? If realism means looking at the consequences of climate change and firming up the application of sustainability principles, we strongly agree. If it means allowing short term 'business as usual' thinking we strongly disagree.	This paragraph has been clarified – it refers to realism about development economics and the need for flexibility on the proportion of affordable housing and other obligations sought on open market developments.
31	Ludlow 21	In paragraph 1.14 the IPG refers to the need to re-think the traditional view of sustainable development. This is a disingenuous and unviable statement. While we agree that social integrity and social issues are important, it is clear that what is required is a genuinely creative approach...you appear to propose the 'traditional' response, to compromise our commitment to protect the environment against the damaging impacts of social demands.	It is important that the IPG does not pre-judge matters which are under discussion as part of the process of preparing Shropshire's Core Strategy however it is suggested that the IPG reflects a creative approach rather than a traditional one. The IPG recognises the need for genuinely local housing need to be met within the settlement where it arises, helping to sustain rural communities and addressing the outflow of the local young seen over many years. It tackles the issue of incommuting by people priced out of the local housing market, thereby reducing unsustainable patterns of travel and work.

Chapter 2: Single plot exception sites

Ref	Respondent	Summary of Comment	Action
1	Shropshire Rural Housing Association	There should be a presumption that the property remains in the affordable stock subject to a 20 / 25 year review.	PPS3 requires exceptions sites to be affordable "in perpetuity".
1	Shropshire Rural Housing Association	How will re-sales of single plot exceptions sites (covered by s106) be monitored?	Via a restricted covenant, see Implementation Plan
1	Shropshire Rural Housing Association	The opportunity to offer up single plots for local housing for sale will greatly assist RSLs in their negotiations to acquire land for larger social rented schemes.	RSLs will not be able to use self build affordable plots to cross-subsidise their developments, as self-build plots are pegged to the cost of construction plus a nominal plot value of £10,000. Proposals which sought to increase land values for affordable housing would be self defeating and not represent good value for money for the public purse. Nevertheless, being able to offer self build single plots for sale may provide RSLs with flexibility in their grant applications and build rates, and help achieve a mix of tenures on larger schemes. It may also encourage landowners to release land.
3	Hereford Diocese	This approach is considered to be very bold and appears to break the mould in terms of seeking to work directly with landowners and individuals who have the means and incentive to make provision for an affordable home. It is hoped that, although ideal for landowners who have a need within their families to provide a dwelling, the potential will be realised for 'community minded' landowners to make provision for others within a rural community in housing need who otherwise would not have access to such a land resource. In this regard it is hoped that information and promotional material might be provided to encourage this type of community initiative.	The implementation plan will include publicity and promotion of the scheme.

3	Hereford Diocese	It is essential to ensure that the on-going availability and affordability of such new dwellings is maintained in perpetuity. This will give the whole approach credibility and proper status and will ensure that the initiative is not abused or undermined.	The implementation plan will include measures to ensure that the resale of such dwellings is properly understood and controlled. Affordable properties are governed by a restrictive covenant but in order to increase public confidence in the scheme they will be regularly monitored, to ensure that they remain affordable in perpetuity.
4	Condover Parish Council	Applications for exception sites should not be given special preference and should follow the usual accepted planning application procedures and be consulted on via the local parish council, which should be recognised as a statutory body during this process.	All planning applications are treated in the same manner, including exception sites. Parish Councils will be consulted in the same way as on other planning applications. In the case of single plot exceptions sites, Parish Councils should also be approached by the applicant prior to planning application stage, and asked to confirm their local connection. The Parish Council is not to consider the suitability of the site or the design at this stage, as these matters will be considered by the Parish Council as a planning matter when the planning application is made.
4	Condover Parish Council	It is important to ensure that an affordable home is for perpetuity as outlined in the policy and cannot be used for private short term financial gain.	The section 106 agreement provides a strong legal mechanism via a restrictive covenant to ensure that this occurs. Ideally the value of an affordable home should be tied to average local incomes, but this has proved unacceptable to mortgage lenders. Discussions with the financial sector have indicated that the consequence of tying affordable prices to salary levels would be to cut off access to finance. In order to obtain mortgage finance for self build affordable housing, the value has to be tied to (rising) market values. Although less than ideal as market property prices rise much faster than incomes it enables the occupier to retain their relative position in the housing market, and assists them to access market housing at a future point. Due to the necessity of obtaining mortgage finance the IPG has retained the definition of "affordable" as a percentage of open market value.

5	Bridgnorth District Council	It is unclear how legal agreements controlling occupancy of affordable dwellings for outright sale will be enforced in future. Conversely, if effectively enforced, housing enabling and implementation staff may find that more and more of their time is taken up in advising on whether prospective purchasers meet the local needs criteria.	Addressed through the Section 106 Agreement containing a restrictive covenant and in IPG implementation plan, which includes measures to check with parish councils that occupancy is being controlled, and to provide guidance to prospective purchasers via local estate agents and solicitors on meeting local needs criteria.
5	Bridgnorth District Council	The guidance needs to be tightened or clarified in a number of areas, for example paragraph 2.1 – omit “generally”; paragraph 2.1 - clarify whether support is from the Parish Council and/or local community, and how “local community” will be assessed.	Clarifications made as appropriate.
13	Ashford Bowdler Parish Meeting	Concerns raised about the fact that owner occupiers who seek permission for a single plot exception site in the same village can be eligible. There is no requirement for applications to include details of any capital, which is particularly relevant for owner occupiers who have built up equity in their existing house and serves to undermine the affordability criteria of the application. It would seem that the draft has become somewhat disingenuous about such applications.	The policy that has operated in South Shropshire has prioritised local need and has allowed downsizing by persons with equity in their existing property on the basis of their ‘need’ to stay in the local area for social reasons and the lack of suitable property available. The advantage of this system is that it increases the stock of affordable properties to the long-term benefit of the local community, provided by households who have both the means and the motivation to do so. This “win-win” situation can make a significant difference to the long-term housing stock, increasing the amount of intermediate affordable property available. Funding the construction of affordable housing is from householders’ own resources. It is accepted that, under this approach, exceptions to normal planning policy can be made on the basis primarily of local connection and housing need rather than financial need alone. The summary “single plot exception sites explained” has been revised to make the purposes of the IPG clearer.
14	Farlow Parish Council	We have long considered this a necessary way of helping local people, especially the offspring of parishioners, in need of affordable housing, to stay in the community. The conditions in the policy seem wholly appropriate and essential.	Support noted.

18	CPRE	We warmly support this section of the IPG. The CPRE encourages provision of affordable housing but only on a local needs basis in rural areas. One of the consequences of relaxing local needs requirements is unsustainable levels of commuting.	Support noted. The need to restrict eligibility to persons with a local connection is fully addressed in the IPG and experience suggests that allowing people access to housing near to their place of work reduces the need for unsustainable patterns of commuting.
21	Mr Gomersall	Most of the inquiries I have had regarding 'affordable housing' are outside settlements but amongst what I would call "clusters" of buildings / houses.	There is a clear requirement within the policy to locate single affordable dwellings within or adjacent to clearly identified settlements where a clear need arises for that accommodation. This includes a range of settlements with differing characteristics depending upon the rurality of the area and the historic pattern of development. The IPG is designed to support a sustainable network of communities accepting that not all settlements where a need for affordable housing might arise will have a full range of facilities or services but that in tune with how sustainable rural communities operate they will have relatively easy access to them, albeit often in different locations.
22	Mr Richards	The single plot exception policy appears to present a sensible way forward - providing young people in the rural area with options.	Support noted.
24	Stottesdon & Sidbury Parish Council	To aid the availability of exception sites there should be an allowance for the landowner to build a property for himself.	The landowner benefits from the plot value (£10,000) and from assisting those in need within his/her community. It would be contrary to strong government guidance and established planning policy to allow market housing to be built on exception sites but many landowners have already benefited their families through bringing land forward for an affordable dwelling for a relative in housing need.
25	Turnbull Tweedale	Question how the figure of £1,300 per sqm cost of construction was reached?	Based on South Shropshire's figures, including scheme costs as well as only construction. The figure may need to be reviewed periodically, and this has been added to the Implementation Plan.
25	Turnbull Tweedale	Applications must be made by the person in need; why can't a developer do this, as the section 106 will have the same restriction on occupancy, no matter who applies.	Applications by developers will be considered as for larger exception sites and negotiated separately to explore both need and the viability of the affordable product being offered The single plot exceptions part of the IPG is only intended for households meeting their own needs, and not for speculative development. This does not exclude an applicant from employing an agent to

			assist him or her to make the application and draw up building plans.
30	West Midlands RSL Planning Consortium	Object to a set level cost of construction as this figure fails to take into account site-specific issues and potential constraints on development. Strongly recommend that a more flexible approach be taken to determining acceptable pricing.	The £1,300 sqm is a generous guideline figure intended to provide a guide for landowners developers and others with a focus for discussions and to assist in providing a formula price for the Section 106 Agreement.
32	Sevenside Housing	Who will collect the recycled proceeds and how will they be distributed? Will there be a ring fenced annual pot for Registered Landlords to access or top up other affordable housing development as necessary?	Shropshire Council will hold monies to be reinvested in affordable housing. The details of how the ring fenced pot will be distributed for affordable housing schemes have yet to be determined, but is an action on the Implementation Plan. No such monies exist at present as no affordable houses have been resold in this way.
I-101	John Bentley, Principal Planner, Central Area	The single dwelling policy is potentially a charter for new housing in the countryside. Landowners will see this as a way to capitalise on land assets and to get round normal planning restrictions. It would be better if the single dwellings could be managed by RSLs or by a more formal mechanism when the first occupiers move on. At present such schemes are not properly monitored if they are not RSL schemes and there is enormous potential for abuse. There is potential for properties to become market properties initially through breach of the s106, followed by applications for Lawful Use Certificates after ten years to legitimise the abandonment of the affordability condition.	Monitoring will sit alongside the restrictive covenant which is part of the Section 106 Agreement to ensure that the properties remain affordable in perpetuity. This is a key to the success of this policy. It is addressed in the Implementation Plan. The single plot exception site policy provides an intermediate affordable housing solution as envisaged and provided for within PPS3, it sits alongside shared ownership and rented housing and is seen as making a valuable contribution to addressing the wide range of affordable housing needs that exist in Shropshire.
I-101	John Bentley, Principal Planner, Central Area	Applicants could be encouraged to work through RSLs to make dwellings available in partnership, as part of the rural affordables pool, that matches identified local need.	The option of working with a RSL is open to the applicant, but this is an innovative policy approach and filtering all developments through an RSL is not required by the policy. The IPG allows for a range of affordable housing options and accepts that the public sector cannot provide for all of the affordable housing need in Shropshire. On resale, the s106 allows the Council (or nominated body) to purchase the property if no person with local need comes forward to purchase it, and only as a last resort would the property be released on the open market with the difference in value being recycled as required by PPS3..
I-101	John Bentley,	After the first occupant moves on, there should be the	Monitoring relies on solicitors notifying the Council in accordance

	Principal Planner, Central Area	ability for RSLs/ LA to nominate tenants in local affordable housing need. There should be at least some specified occupancy review mechanism after the first occupier.	with the Title deeds when the property changes hands; this is secured by way of a restrictive covenant. To assist this, the Council proposes being proactive in communicating procedures to local solicitors, for example notifying them on an annual basis of this requirement, and signposting solicitors to the latest guidance available for the benefit of sellers of affordable property and their legal representatives. Added to Implementation Plan.
I-101	John Bentley, Principal Planner, Central Area	Occupiers should be those in the most need rather than depending, for example, on whether a relative happens to own land. Could single dwellings have to be offered as part of the rural housing pool in the first instance, unless it can be demonstrated that a person nominated by the applicant can be shown to have greater / as great a need?	Admittedly there is a tension between those in most need (who have least means to provide for their needs) and those with the resources to do so. While the IPG benefits the latter category in the short term, it also benefits the former category in the longer term, by increasing the long-term pool of affordable housing stock. There has to be an incentive for those with resources (in this case land) to help deliver affordable housing. Without the incentive that it will benefit themselves or their relatives, fewer affordable properties will be provided. Negotiations within the existing South Shropshire policy have encouraged landowners not only to meet the needs of their family members by releasing land for them but to also to provide plots for others within the community. Development management staff are encouraged to use the IPG as a positive tool to seek additional plots of land to be released in settlements where there is a need to do so and the opportunity arises to increase the overall stock of affordable dwellings.
I-101	John Bentley, Principal Planner, Central Area	A rigorous scrutiny process of applicants needs to be in place.	Provided by the Housing Enabling & Implementation team employing the questionnaire in appendix F and involving the local parish council.
I-102	DMOG	There should be more emphasis on having an all round sustainable location. Concern about what settlements might be suitable for affordable dwellings – a revised list was desirable. Also potential impact of increasing ribbon development.	A list approach to suitable settlements is not proposed within the IPG. The policy emphasis is on creating balanced and sustainable communities which means that where a genuine need for affordable housing arises this should where possible be met within that community, on a site located within or adjacent to a clearly identified settlement.

I-102	DMOG	Concern that policy originated in South Shropshire where different characteristics to other parts of Shropshire (eg. close community ties and very remote areas). Bridgnorth has greenbelt, which has strict criteria for new development and this needs recognition.	Reference to Green Belt policies is in the IPG. Normal national policies apply in terms of PPG2 and PPS3 to prevent harm to the green belt
I-102	DMOG	Barn conversions need to be considered for affordable housing and this needs writing into policy.	Where existing Local Plan policies are not already explicit in allowing affordable housing within "barns", and to supplement PPS7, the acceptability of allowing the reuse of such buildings is added to the IPG

Chapter 3: Larger exception sites

Ref	Respondent	Summary of Comment	Action
1	Shropshire Rural Housing Association	Advocates that the settlements in which larger exception sites would be appropriate should include any “where there is / may be local employment opportunity and/or the need to seek or provide care”.	The IPG allows larger exception sites in settlements with minimal services, but not settlements with none.
1	Shropshire Rural Housing Association	If there is not an identified need for close to 100% of properties for local needs then the development is too large.	More explicit reference to local needs assessment has been added to the IPG.
1	Shropshire Rural Housing Association	Exception sites adjacent larger settlements will perpetuate the “council estate” form, and therefore all developments must contain a mix of properties.	The IPG refers to a mix of housing tenures to reflect identified community needs, but exception sites must nevertheless be 100% affordable, with a range of affordable housing options secured where possible. It should also be noted that exception sites are limited in scale.
3	Hereford Diocese	Where schemes are seen to deliver, ‘success breeds success’ and other landowners in neighbouring villages and communities come forward to offer sites. Active RSL and local authority engagement with local communities can make a lot of difference in promoting and securing local needs/ affordable housing.	Sharing ‘good news stories’ and examples of success has been added to the Implementation Plan, to assist in unlocking further community co-operation.
3	Hereford Diocese	Landowners should be encouraged to be more directly involved in discussions with local parishes and communities and the local planning & housing authority should engage with these landowners, along with the RSLs, to consider the strategic opportunities that might exist within the wider area.	This is part of the role of the Rural Enabling Officer. Added to the Implementation Plan.
3	Hereford Diocese	Take forward...the more positive approach of seeking to establish how new development would support and strengthen community life and sustainability (see the ‘Toolkit for assessing sustainable rural communities’ published Dec 2008 by Devon County Council, Torridge District Council and West Devon Borough Council).	Support for the IGP approach which seeks to strengthen community life noted. Torridge approach noted for the forthcoming Core Strategy.

3	Hereford Diocese	<p>Look at villages and smaller settlements in terms of their 'clusters' and inter-relationships. Often travelling distances from village to village, with public transport links between them, are much shorter than village to town. Recognise the opportunity to create sustainable 'clusters' of rural communities, each offering elements of local facilities, places to work and affordable homes.</p>	<p>This is the approach adopted, for single plot exception sites, the services and employment within the surrounding area, not only the settlement in question, are taken into consideration.</p> <p>Point noted also for the forthcoming Core Strategy.</p>
3	Hereford Diocese	<p>The issue of tenure mix can sometimes create problems and it is essential that robust evidence is at the core of any decision making process to establish the required mix. One of the key failures is where a scheme is developed and does not meet the needs of the local people identified as being in need. It would also be beneficial to ensure that there is on-going flexibility, with suitable controls, to allow the tenure mix to vary over time as properties become available, in order to meet the need in the future.</p>	<p>Local needs keep changing, with a common experience being of need altering between survey of need and construction of affordable properties, even when these dates are only 6-12 months apart.</p> <p>The single plot exceptions scheme allows for private ownership and private renting, plus the option (if no other demand) of the Council or a RSL taking the property on for social rent. The s106 agreement thus allows significant flexibility, to accommodate changing needs.</p> <p>Similarly, the draft guidance allows flexibility on larger exception sites (see paragraph 3.6 of the draft IPG), "to be informed by local housing information and identified community need".</p>
3	Hereford Diocese	<p>The importance of employing a transparent and workable 'cascade' approach to allocating new affordable housing is crucial. The concern amongst local people where an affordable housing scheme is proposed is that it may simply result in people from the nearest town, or even from further afield, being housed in a village and the local people missing out. Certainly landowners are very wary of providing sites for 'local needs affordable schemes' which may in fact not serve a local need at all. The criteria for cascading – from parish to neighbouring parishes, etc needs to be fully set out and explained – and every effort should be made to ensure wherever possible that local people benefit as this tends to support local community life best and serves to add credence to the overall aim of the exception site policy.</p>	<p>The 'cascade' mechanism has been reviewed, and the extent of 'local area' revised from 15 miles radius down to 10kms excluding persons from within settlements within that radius as these settlements should be meeting their own identified needs. There is a balance to be struck between limiting eligibility to local people on the one hand, and satisfying mortgage providers that there is a sufficient pool of potential purchasers to ensure that a mortgage is forthcoming. Without availability of finance, affordable homes will not be built.</p> <p>The cascade currently jumps from the parish / within 10km ("initial qualifying persons") to Shropshire-wide ("secondary qualifying persons") after 3 months. In most parts of Shropshire, 10km will include adjoining parishes and neighbouring villages. In the more sparsely populated parts, such as South Shropshire, a wider catchment (eg. 20km) could be specified to meet local circumstances. The model s106 agreement can be adjusted to meet particular circumstances</p>

			<p>where necessary.</p> <p>To increase the likelihood that local people will take up their “first refusal” opportunities, the model section 106 agreement has been amended to ensure that the marketing of affordable properties <i>must</i> include site notices / “for sale/rent” boards at the property concerned.</p>
3	Hereford Diocese	Careful consideration will need to be given to promoting 100% affordable housing development adjacent to towns and larger settlements. The ‘hope’ value that is often attached to land around and adjacent to larger settlements will often mitigate against landowners wishing to release it for solely affordable schemes. The proximity of such sites to the existing ‘edge of town or settlement’ will clearly be a factor and to simply allow small enclaves of 20 or less affordable dwellings, poorly related or unrelated to an existing settlement, would not create a sustainable development for the occupiers of those new homes.	<p>Noted. Although hope value can be a problem, urban exception sites that have been developed in the past on sites on which market housing would never be permitted.</p> <p>The draft IPG requires such sites to be “relatively accessible, near to services and facilities” (para 3.10). In addition, normal Local Plan policies will apply, and together should ensure that sites are suitably located.</p>
4	Condover Parish Council	When carrying out a local needs survey of affordable homes the principal authority should consult the parish and parish plans should be taken in to account when determining the needs of the area.	Reference to parish plans has been added to the IPG.
5	Bridgnorth District Council	Paragraph 3.5 – defined as 2 to 20 dwellings but this needs to be considered flexibly as a number of factors will determine what is the most appropriate size to meet community needs – it is unclear what these factors are.	Examples have been added (eg. size of settlement and history), but some flexibility provides useful scope to reflect local issues and therefore a rigid definition has been avoided.
5	Bridgnorth District Council	Paragraph 3.6 - clarify how “identified community need” will be assessed.	Wording tightened to clarify that “local housing information” refers to “identified community need”.
5	Bridgnorth District Council	Paragraph 3.7 – if 80% are for local people then up to 20% could be for non local people. Is this acceptable for exceptions sites, where the primary purpose is surely to meet housing need?	Some flexibility is beneficial, particularly when “local” is tightly defined, to ensure that stock is not left vacant.

14	Farlow Parish Council	We counsel more caution – poor roads, no post office or shop, no pubs. Schemes of larger than 4 dwellings would neither have the local need or be in harmony with the character and appearance of the area. Local demand has to be demonstrated.	The draft IPG states “a number of factors will determine what is the most appropriate size to meet community needs” including the character and appearance of the area and normal planning criteria (paragraph 3.5). Consequently the IPG should not result in the development of sites that are inappropriately large.
18	CPRE	The maximum size of an exception site should be five dwellings. Large sites should be advanced through the LDF, not exception policies. Allowing large exception sites leads to greenfield development, and can cause resentment and controversy, and result in social housing ghettos. This is in conflict with paragraph 5.11, which stresses the need to avoid clusters through pepper-potted distribution.	There is a distinction to be drawn between smaller and larger settlements in the size that would be appropriate. Chapter 3 has been re-structured to clarify this. Nevertheless, a site of more than 5 dwellings may be appropriate in a larger village. For example, 20 dwellings in a settlement of 2,500 population equates to 0.8% of the housing stock. Although pepper-potting is preferred, a development of 20 affordable homes on the edge of Shrewsbury would not be turned down on this basis, because the benefit of an increased number of affordable homes exceeds the impact of grouping them together. The balance of factors might however be different in a smaller settlement. Any large exception site will contain a mix of affordable tenures.
18	CPRE	In rural areas, all occupancy should be from people with a strong local connection to the local area, to prevent unsustainable levels of commuting with its consequences for traffic on minor rural roads and minimise impact on climate change. Affordable housing should be built for identified local needs not to meet wider targets.	The fall-back position (where there is no eligible local person), in which eligibility extends to all of Shropshire after 3 months, is necessary because it is not acceptable to leave affordable homes empty, given the high degree of need across Shropshire.
21	Mr Gomersall	It would be good to insert a paragraph of support and flexibility about organisations such as Bishops Castle & District Community Land Trust.	Reference to Community Land Trusts has been added to the IPG.
22	Mr Richards	I welcome the proposal to provide more private ownership affordable housing; involvement of an RSL is often seen negatively by both potential occupiers and local residents.	Support noted, a range of affordable options can best meet needs.

24	Stottesdon & Sidbury Parish Council	Rural sites are proving very difficult to meet sustainability even to level 3 – this should be revisited. We are pleased to see that there are plans to look at sites/villages on a case by case basis due to the difficulty of obtaining land when there is need.	We accept that in rural areas without mains gas it can be more difficult to meet Code level 3IPG amended to emphasise thermal and water efficiency at Level 3 rather than the Code itself which will follow in 2010 with new Building regulations. Support noted.
24	Stottesdon & Sidbury Parish Council	As we have lost our 'local authority' area the radius for 'local people' should be: 1 parish and strong local connection within the parish. 2. Persons from adjoining parish or with a strong local connection within a radius of 5 miles.	'Local area' has been redefined in the IPG as within the parish or 10km of the site excluding persons from within settlements within that radius as these settlements should be meeting their own identified needs.
25	Turnbull Tweedale	The efficient operation of the cascade approach will be essential to the speedy sale and occupation of affordable housing.	Speed is also a priority for the mortgage lenders, and the section 106 reflects this.
28	Taylor Wimpey UK	We would not wish to see a restriction imposed on the size of exception sites, particularly given the demonstrated need for affordable housing. Suggest amending paragraphs 3.5 and 3.10 to read, "In light of the levels of affordable housing required, it would be advantageous to maximise the potential of exception sites having regard to local levels of housing needs."	The maximum size of site that would be considered appropriate as an exception site is not only related to the size of the settlement, but also to the requirement in PPS3 to achieve mixed communities. Given that exception sites are 100% affordable, they do not allow a mix of market and affordable tenures. To avoid a concentration of affordable housing, a maximum size of around 20 homes is considered about the right balance.
28	Taylor Wimpey UK	How will 'local housing information and identified community need' be demonstrated (paragraph 3.6)?	A range of evidence can inform decisions, including local needs surveys, parish plans, strategic assessments, forthcoming choice based lettings data, etc. As the evidence available varies between places and over time, it is preferable not to be too specific.
28	Taylor Wimpey UK	It is not within the remit of this non-statutory document to override adopted Local Plan policies and include target criteria. The "requirement" for 80% of dwellings to be for local people should be deleted.	The IPG's requirement for local occupancy is fully compatible with the adopted policies of Bridgnorth Local Plan (policy H11), Oswestry Local Plan (policy H26), Shrewsbury & Atcham Local Plan (amended policy HS7) and South Shropshire Local Plan (policy SDS7). The IPG adds to North Shropshire Local Plan policy H13 and does not conflict with any of that policy's current provisions. Furthermore, there is a cross-reference in the Shropshire Affordable Housing Allocation Policy to "local lettings policies"

			that may be imposed by section 106 agreements or other planning mechanisms, which makes the 80% requirement compatible with the Shropshire Affordable Housing Allocation Policy operated by the larger Registered Providers in Shropshire.
28	Taylor Wimpey UK	Landscape sensitivity can change over time and therefore flexibility should be included to facilitate affordable housing providers providing their own landscape evidence if they wish (paragraph 3.10).	As additional landscape appraisals submitted by an applicant would be material considerations, reference to them has been added to the IPG as suggested.
30	West Midlands RSL Planning Consortium	We are strongly supportive of the flexible approach taken to the definition of 'larger' exception sites and the tenure splits to be required on such sites. The suggested cascade (pages 10-11) is also supported as this should enable housing to become available to the widest possible number of those in need within a relatively low time scale.	Support noted.
32	Sevenside Housing	Welcome the acknowledgement that larger exception sites in Shropshire villages should be considered especially where there is strong demand. The cascading approach (to occupancy) under paragraph 3.7 is a sensible and flexible approach.	Support noted.
I-101	Ian Kilby	The cascade approach lifts the local restriction after 6 months. Surely this is a flawed argument in providing affordable housing to meet a local need? The cascade approach might not be required were the development in sustainable locations with a greater demand for affordable housing rather than built throughout the countryside?	The cascade approach has been designed to meet the requirements of mortgage lenders. In order to obtain mortgage finance, it has been necessary to allow the local restriction to be lifted within a relatively short time. However, the cascade widens from a 10km radius after three months to persons with a Shropshire connection. Given the scale of demand for affordable housing in Shropshire, it is unlikely that any properties will not attract a purchaser within six months.
I-101	John Bentley, Principal Planner, Central Area	There should be a general presumption of being managed, by or be a partnership involving, RSLs.	Non RSLs include Community Land Trusts, diversifying residential suppliers and individuals providing multiple plots on a similar basis as the single plot exception sites. In seeking to facilitate innovative approaches to providing affordable housing, the IPG seeks to avoid being overly prescriptive. Consequently it is preferable to leave section 3 open to all providers of affordable housing.

			On the other hand, adequate safeguards are necessary to prevent exploitation of the IPG. The s106 agreement will be used to control occupancy and affordability.
I-104	Enquiry re larger exception site at Wilcott	Wilcott has no services, but is less than 1 km walk from the centre of Nesscliffe, which has a shop and post office, village hall, school and pub. Although the draft IPG would allow a larger exception site close to a main service village, Nesscliffe does not qualify as a main service village in the Local Plan.	Wording of IPG changed from “main service village” to “a larger settlement having two or more services or facilities”.
29	Natural England	Paragraph 3.10 should also include reference to sites of nature conservation interest and protected species.	IPG amended accordingly.
33	Welshampton and Lyneal Parish Council	Affordable housing should be entirely local needs based. Properly executed surveys and research to identify the scale of the local need is the required approach in a small community. It is the mix of properties, from affordable to large detached, which make up the character and appearance of a typical Shropshire parish. Large developments of any housing, including affordable, must be avoided. Large in a community such as this Parish probably means more than 5 units.	Housing needs surveys will inform the tenures and types of houses on exceptions sites (paragraph 3.6 of draft IPG). Given the scale of need, it is most unlikely that any village will have no need. Exception sites must reflect the character and scale of the village, and this will strongly influence the number of affordable properties that will be considered appropriate. In small villages a development of more than 5 properties may be excessive, but in villages of nearly 3,000 population a 20-unit development represents less than 0.7% of that village’s population.

Chapter 4: Standard conditions for all exception sites

Ref	Respondent	Summary of Comment	Action
1	Shropshire Rural Housing Association	There should be a 20/25 year review of section 106 agreements and conditions.	An application to vary a condition or a section 106 agreement may be made at any time.
1	Shropshire Rural Housing Association	Why should there be a presumption that garages / car ports are not to be allowed?	There is a presumption against integral garages on design grounds in rural areas and it should be noted that they will count against the size of the permitted dwelling but the standard condition does not prevent garages, only remove permitted development rights in order to give the Council a greater degree of control over incremental enlargements to the affordable dwelling that may negate its affordability or cause unacceptable visual intrusion. Appendix A refers in more detail to treatment of garages.
3	Hereford Diocese	Standard conditions are welcomed in that they will provide a clear understanding for all concerned.	Support noted.
3	Hereford Diocese	The limitation to 100sqm may need to be challenged occasionally where there is a need to house a large family. In addition, where a need arises to provide additional accommodation for a family this is better achieved through an extension rather than the upheaval of having to move – possibly away from the local community and support structure.	Applications can and are regularly made to alter planning conditions. When such applications are received, they will be considered against the IPG. The draft IPG does not currently make it clear how the planning authority will consider such applications, and consequently chapter 4 has been amended to clarify that the Council will be reasonably flexible where the applicant can demonstrate a genuine need for a larger property.
8	Environment Agency	We support the requirement for all dwellings to be Level 3 of the Code for Sustainable Homes and would see this as a minimum standard, with greater use of renewable resources encouraged. Schemes should ensure the provision of both foul and surface water is adequate.	Support noted and although the requirement of formally obtaining this standard has been removed energy and water efficiency to Code level 3 is still to be sought. The interim planning guidance is in addition to existing Local Plan policies and therefore does not need to repeat all aspects of normal planning. The introduction has been amended to make this clearer.
12	Galliers Homes Ltd	We consider that the figure of 100 sq metres is too restrictive. It is just possible to build a 4 bedroom house with this amount of floor space, but it is not	The circumstances in which it would be acceptable to exceed 100sqm have been elaborated in additional text to this section.

		possible to build a 4 bedroom house to 'lifetime homes' standard within this restriction. This floor space restriction would also make it impossible to build 5 bedroom houses which might be needed in some circumstances to satisfy local housing need.	
25	Turnbull Tweedale	At paragraph 4.1 it states that larger exception sites (more than 1 dwelling) promoted by others, this document will need to define what is meant by 'others'.	Maximum flexibility is maintained by <i>not</i> defining "others". The context makes it clear that it includes any body or organisation that is not a RSL (Registered Social Landlord, now termed Registered Providers). The wish of the IPG is to negotiate separately on innovative solutions within the terms of the guidance.
25	Turnbull Tweedale	Paragraph 4.2 states that there will be a restriction on the size of the property (to not exceed 100sqm), this however is not suitable to the larger family that may be in need of an affordable home. Similarly Paragraph 5.19 part d) suggests that permitted development rights are removed to restrict the size of the dwelling. However this is restrictive to expanding families who wish to stay in their home, and extend the dwelling to cater for additional members to the family, an extension would be more appropriate than the unnecessary emotional stress and expense of moving. With permitted development rights moved there will not be a guaranteed planning approval.	The circumstances in which it would be acceptable to exceed 100sqm have been elaborated in additional text to this section, where it is made clear that the value of the property will however still be on this basis
25	Turnbull Tweedale	At paragraph 4.4 it talks about it being necessary for s.106 agreements on sites adjacent to towns exceeding 3,000. What settlements in Shropshire would this include?	An Appendix has been added to clarify which settlements exceed a population of 3,000. .
28	Taylor Wimpey UK	The requirement to meet the Code for Sustainable Homes level 3 should only apply where public grant is provided. The additional cost of meeting this specification could prevent the delivery of dwellings if it is not linked to grant.	Requiring code level 3 ensures that affordable homes are built to high standards, and in particular have good thermal efficiency. Code level 3 will be a requirement of all new homes from 2010, under current government proposals. However, the benefits of the Code are academic if the additional costs prevent the homes being built. An alternative approach is proposed which requires thermal and water efficiencies, as well as the lifetime homes elements of level 3 of the Code to be demonstrated to be met, without formal compliance per see.

28	Taylor Wimpey UK	The Code for Sustainable Homes is controlled by alternative legislation and as such should not be controlled through this guidance. PPS1 paragraph 30 states, "planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements".	It is legitimate for local planning guidance to seek higher design standards than required by statute, and widely practised by many local authorities without legal challenge. Nevertheless an alternative approach is proposed which requires thermal and water efficiencies, as well as the lifetime homes elements of level 3 of the Code to be demonstrated to be met, without formal compliance per see
32	Sevenside Housing	A maximum size of 100sqm would not facilitate the larger range of affordable housing. This could read as 'minimum internal layout sizes from 60sqm for a 2 bed bungalow up to 120 sqm for a 4 bed house'.	The circumstances in which it would be acceptable to exceed 100sqm have been elaborated in additional text to this section. It should be remembered that the restriction is on single plot exception sites only, and as affordable homes for sale their value is directly tied to their size.
I-102	DMOG	Need to add in removal of permitted development rights in standard condition.	IPG amended accordingly.

Chapter 5: Affordable Housing within open market developments

Ref	Respondent	Summary of Comment	Action
1	Shropshire Rural Housing Association	Positive about the need for realism in what is deliverable and viable, but whose is the realism?	Prices at the time of the application are relatively easily substantiated and can be agreed as facts between the parties. However, assumptions about future prices that may pertain when the homes are complete are a matter of conjecture and therefore a cause of potential disagreement between the parties. Further guidance on this matter for the use of development management officers is being developed through the LDF process, and will be informed by the final report by Fordham Research on viability (awaited at the time of writing).
1	Shropshire Rural Housing Association	Viability should take account of the considerable costs of meeting the Code for Sustainable Homes. Where no gas supply is available, consideration should also be given to the costs of providing alternative forms of energy.	"Open book accounting" enables all costs to be assessed, including those mentioned.
1	Shropshire Rural Housing Association	From a housing management point of view it is not always practical to have "physical and social integration of affordable and open market housing".	The Council recognises the management issues inherent in close proximity, for example where RSL tenants and private owners share party walls. On the other hand, it is important that social housing is not concentrated in large blocks. A workable compromise, already widely practised, is to allow small clusters of social housing, for example blocks of four properties, but not larger clusters, for example, ten or more properties of one tenure. The balance will vary from scheme to scheme, depending on topography, design and scale of the development. Amendments have been made to the IPG to reflect this balance between integration and practical management issues.
1	Shropshire Rural Housing Association	The requirement that "Affordable homes must be indistinguishable from market homes" should apply to all affordable developments, not only mixed developments.	100% affordable schemes do on occasion use innovative designs, such as the Eco homes recently built at Ludlow. To require all affordable homes to mirror market developments could undermine creative design on 100% affordable sites. It is therefore recommended that no change is made to the IPG in this respect.
3	Hereford Diocese	The use of pre-application discussions and scoping exercises to ascertain the range, mix and	Both the importance of pre-application discussions and the need for flexibility are clear in the draft IPG. The 'open book' approach to economic

		design of larger scale open-market housing schemes is considered essential. It is important to remember that LPAs are charged with 'delivering houses' and in order to do this there may well need to be some flexibility in the number and mix of affordable houses as well as other section 106 requirements and costs.	viability demonstrates a commitment to realism and delivery.
3	Hereford Diocese	Deriving the appropriate price of 'affordable' properties needs to be transparent and clear process. The calculations need to be based upon realistic values depending on market conditions at the time. There will need to be some flexibility in approach to allow for regular review and re-assessment to reflect changing economic and housing market conditions.	The draft IPG proposes to link re-sale values of affordable homes to a fixed proportion of market prices. When the market rises, the owners of affordable homes will benefit from the increase in value of their property.
3	Hereford Diocese	Requiring developers to sell 'affordable homes' to RSLs at no more than 60% of the nominal cost of construction may discourage developers and landowners for the larger sites from coming forward.	Affordable homes are usually subsidised from some source, and where there is no grant available, the subsidy is from the development. This is usually reflected in the price bid for land, and therefore is ultimately borne by the landowner – who usually makes a substantial profit from the sale of the land despite this dampener on price. The planning system seeks to counter any negative effects by ensuring sufficient sites can come forward, to ensure adequate land supply despite lower land values. The need for greater flexibility with regard to the price at which affordable units are sold to RSLs has been raised by a number of respondents. This issue is discussed in more detail under the "Issues" section above.

3	Hereford Diocese	Advise against allowing shared ownership to staircase up to 90%, as it raises property above an affordable level. Suggest the cap on value is the same as for single site exception plots (60% in the draft IPG).	The percentage of open market value (OMV) at which an affordable property ceases to be affordable falls as market values increase. 60% OMV is currently the level at which properties are considered affordable, and this may reduce to 30% or less within 30 years. Thus any cap on value may be insufficient to ensure affordability in future years. On the other hand, the purpose of staircasing is to facilitate the move from affordable housing into market housing. The availability of this type of intermediate housing provides choice for households who are aspiring to market housing. It is suggested that 80% provides a suitable compromise between the two points of view, preventing property losing its "intermediate affordable" status but nevertheless facilitating the move by occupiers into market housing. The standard Heads of Terms in the IPG have been amended accordingly.
3	Hereford Diocese	Comment on the imperative for ensuring a good supply of new housing during a difficult period of the economic cycle – implied support for the IPG approach to open book accounting as a basis for negotiating the proportion of affordable housing. Emphasises the importance of delivery of the required number of dwellings to meet the needs of the local community.	Support noted.
5	Bridgnorth District Council	Paragraph 5.7 – how would the 30% of the affordable homes that are for outright sale be controlled?	Affordable homes for outright sale will be controlled by a restriction on the Title similar to the model s106 agreement, but with resale values linked to earnings rather than the cost of construction, as referred to in paragraph 5.17. Paragraph 5.7 has been clarified to cross-reference to paragraph 5.17.
5	Bridgnorth District Council	Paragraph 5.13 – permitted development rights will "normally" be removed. This is an important safeguard. However, the use of the word "normally" suggests there will be exceptions and it would be helpful to those making decisions on planning applications for the guidance to indicate what circumstances might lead to such exceptions, and perhaps give examples.	Maintaining permitted development rights may be appropriate where the affordable properties have been deliberately designed to allow for family expansion, or where the properties are at the smaller end of the scale and could be enlarged without increasing values beyond an affordable level. The text has been amended to clarify such exceptions to the rule.

6	Defence Estates	<p>The development of service family accommodation for MOD personnel should not incur requirements for affordable housing. This type of development is already meeting a housing need and will therefore not be available on the open market. It is considered that it would therefore be inappropriate for affordable housing provision to be required on such sites, particularly where sites are not accessible to the general public.</p>	<p>It would be clearly inappropriate for affordable housing to be provided amongst barracks that are “behind the wire” and not accessible to the general public. However, family accommodation for service families is often integrated with general housing. As tied housing, for a special category of key workers, it has similarities with nurses’ accommodation and estate workers’ accommodation. In such cases the Council is usually more flexible in its affordable requirements, taking each case on its merits, but it would not be appropriate to give a blanket exemption.</p> <p>The MOD already sees the benefits of integrating service personnel with the wider community, and this should extend to an appreciation that affordable homes in the vicinity can benefit ex-service personnel as well as family members of existing service personnel. The MOD may wish to consider the particular role that its generous land-holdings might play in providing affordable accommodation for retired or injured ex-service personnel, for example.</p> <p>It is recommended that the MOD is not singled out for special treatment in the IPG, and that appropriate affordable provision as part of MOD developments remains a matter for detailed negotiation at planning application stage.</p> <p>The role of tied housing, as neither “open market” general needs housing nor “social rented” housing, raises interesting issues for the wording of the Core Strategy policies. The IPG does not seek to introduce changes to the Local Plan policies (detailed in appendix D of the draft IPG) and consequently it would not be appropriate to address this issue in the IPG. However, this is an issue that the Core Strategy might address in due course.</p>
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12	Galliers Homes Ltd	<p>Welcome recognition of the need for flexibility in the current market downturn (paragraphs 1.6 & 5.1) but are concerned that this is at odds with taking the Local Plan policies as a starting point for negotiations (paragraph 5.4). The IPG's open book accounting approach to negotiation (paragraphs 5.20-5.23) is inconsistent with using the saved policies as the starting point. Instead, the developer's financial appraisal should feature at an early stage in the pre-application discussions with the Council's officers who will provide input on their assessment of the need for affordable housing in the area.</p> <p>While supporting the principle of <i>"Open book accounting / negotiation with regard to economic viability"</i>, we think that it is essential that the Council works from the outset with developers to produce an agreed financial model that will be used to assess the level of affordable housing that could realistically be provided on each site. Once agreed, the model should then be used on a consistent basis by all developers and on all sites across Shropshire.</p>	<p>The inconsistency in the IPG has been removed by deleting the first sentence of paragraph 5.4. The fact remains, however, that there is some inconsistency between the Local Plan policies and the IPG's "open book accounting" approach. The relative weight to be afforded to the IPG vis-à-vis the Local Plan policies is addressed by a new section at the beginning of section 1 of the IPG.</p> <p>A common model will be provided by the forthcoming study, (expected summer 2009) into development viability in Shropshire by Fordham Research on behalf of Shropshire Council.</p>
12	Galliers Homes Ltd	<p>In relation to the need to maintain affordable prices in perpetuity, we welcome the intention stated in paragraph 5.15 that changes in value over time will be fixed as a percentage of the open market value given in the relevant Section 106 Agreement. This is the appropriate datum to use.</p>	<p>Support noted.</p>

12	Galliers Homes Ltd	<p>We agree with the principle that the timing of the provision of the affordable housing should be established in the Section 106 Agreement (paragraph 5.17, first bullet point). However, the proposed timing (prior to occupation of the first open market dwelling) is unacceptable because at the point proposed for the transfer, the house builder would not have received any revenue from sales and would not have been able to have afforded to construct the affordable housing. We suggest that the completion of a percentage of the affordable housing should be linked to the completion of a specified percentage of the general market housing. The percentages will need to vary to allow for differences between schemes, e.g. to take account of variations in infrastructure costs and the timing of infrastructure costs, and to allow for the phasing of large schemes.</p>	Point accepted. Paragraph 5.17 amended accordingly.
18	CPRE	<p>We question the proposed 30% affordable for sale. We understood PPS3 to say that low-cost housing for sale is not deemed to be affordable.</p>	<p>PPS3 does allow affordable housing for sale. This is different from low-cost market housing, which falls outside the definition of affordable housing.</p>
18	CPRE	<p>While large developments might allocate a proportion of affordable housing on site, small developments should contribute to an affordable housing fund. This would remove the threshold problem, where small developments make no contribution. We recommend that the council consider whether all affordable housing provision might be through a levy rather than provision of affordable housing on site.</p>	<p>PPS3 requires affordable housing to be provided on site wherever possible. Lowering the threshold to include all sites (as is the case currently in South Shropshire rural settlements) is a matter for the Local Development Framework.</p>

18	CPRE	It is not however appropriate to establish a fixed percentage contribution from developers at the moment as the economic picture and government housing policy is changing rapidly. The danger is that the level of developer contribution will be set too low in the current market panic and it will be difficult to increase this once markets stabilise and improve. We have proposed that the Core Strategy adopts a biennial review mechanism for setting the level of developer contribution to affordable housing.	Changing Local Plan policy with regard to the affordable housing requirement is a matter for the Local Development Framework rather than this IPG. The Council has commissioned Fordham Research to undertake a study into development viability, and advise it on how to set appropriate levels of developers contributions that reflects changing economic circumstances over time. The IPG makes it clear that an open book accounting approach will be taken during the current economic downturn (paragraphs 5.20 – 5.23 of the draft IPG).
18	CPRE	We would like to see a specific policy banning the “right to buy”. Shropshire Council should pursue a policy of buying houses on the open market to let, using either their own funds, funds from a housing corporation, partnership or other source.	Section 106 agreements (or a condition in the case of a RSL) are used to ensure that affordable homes remain affordable in perpetuity. (See draft IPG paragraphs 2.2 & 4.4).

19	Shropshire Homes	<p>Whilst welcoming the pragmatic approach and flexibility expressed in paragraphs 5.1, 5.16 and 5.21, objects strongly to controlling the value at which affordable housing is transferred to RSLs (paragraph 5.17). This approach will severely restrict the supply of development land coming forward and make the Council's target almost impossible to achieve [this has been witnessed to a large extent in South Shropshire in recent years]. A 'one cap fits all' approach is totally inappropriate.</p> <p>It would be preferable to continue the policy of most of the other district Councils that allows the developer to negotiate a fair value with an RSL, taking the specific factors effecting the individual development and the local housing market fully into account.</p> <p>This approach will of course require the Council to agree to the percentage of affordable housing and the tenure mix at a relatively early stage and – other than in exceptional circumstances – not to modify this decision.</p>	<p>Following the Shropshire RSL Developers Sub-Group on 20 April and a follow-up meeting on 24 April, a consensus appeared to emerge that it is better not to specify the price to be paid by RSLs for affordable housing on mixed developments. Both RSLs and developers prefer the negotiating flexibility that currently exists in most parts of Shropshire. Consequently reference to a set price has been removed from the IPG. The Council will agree the percentage and tenure mix for the affordable units as per paragraph 5.5 – 5.7 of the draft IPG.</p>
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19	Shropshire Homes	<p>Policy 5.19C suggests the all affordable houses on mixed schemes should be built to level 3 of the Code for Sustainable Homes. Paragraph 5.12 implies that therefore all houses on market developments should be built to this standard. Whilst this is a laudable objective in an ideal world, the imposition of this in advance of national guidance and in the present market conditions would reduce the total number of dwellings being developed in the short / medium term and would reduce the proportion of affordable homes that could be incorporated. I strongly urge the Council to remove this policy at this stage and await its implementation at a national level.</p>	<p>In practice, it is unlikely that a mixed development will be refused planning permission on the basis that the Interim Planning Guidance on affordable housing requires higher design standards. Such a decision is likely to be lost on appeal, as the IPG carries less weight than adopted Local Plan policies.</p> <p>The quality of design and construction in open market developments is an important issue, but it is an issue that should be addressed by the Core Strategy. Appellants have a strong case that the IPG is exceeding its legitimate remit on affordable housing by seeking to raise design requirements in other developments.</p> <p>Consequently the reference in the IPG to market homes being built to the same standards as affordable homes, has been removed and amendments made to the requirements for affordable homes to meet level 3 of the Code for Sustainable homes in advance of their 2010 general introduction.</p>
19	Shropshire Homes	<p>The principles outlined in paragraph 5.20 should be confined to the negotiation of affordable housing percentages.</p>	<p>As paragraph 5.7 implies, the tenure mix is negotiable, and room for manoeuvre on affordable housing tenures is as important as flexibility on affordable housing percentages. Viability is a key factor in both cases, and therefore it would not be appropriate to restrict its relevance only to the latter.</p>
22	Mr Richards	<p>In general I am pleased that you are suggesting practical solutions to find more affordable housing, rather than relying on the diminishing supply of affordable homes from new developments. I would urge caution however in seeking a high proportion of affordable housing from new developments. At a time when housing developments are increasingly unviable I feel 25-30% is more than adequate.</p>	<p>The Council recognises the problems of viability in the current economic climate. Consequently a fundamental aspect of chapter 5 is the “open book” accounting approach to negotiating the proportion of affordable housing sought on a commercial development.</p>

24	Stottesdon & Sidbury Parish Council	Pleased to see that market houses should be built to the same standard as RSL's. Pleased to see that a Deed of Covenant on affordable housing to buy is to be put in place.	In view of other comments received, it has been conceded that the quality of design and construction in open market developments is an issue that should be addressed by the Core Strategy rather than in the IPG. Consequently the reference in the IPG to market homes being built to the same standards as affordable homes has been removed pending consideration of the issue in the LDF. Support for the Deed of Covenant approach is noted.
24	Stottesdon & Sidbury Parish Council	Planning permission needs to be a much simpler and smoother mechanism with much more help and input from officers. When a Housing Needs Survey proves a need it should not take 5 years to implement a scheme, but dealt with swiftly.	The Council's new Housing Enabling and Implementation team has been established to assist in the delivery of affordable housing. However, inasmuch as the Council is not developer, but an enabler, it is to some extent dependent on landowners and developers to bring schemes forward to deliver housing on the ground.
25	Turnbull Tweedale	At paragraph 5.12 you mention that standards of market housing need to be improved to match those complied by RSL's. Complying to these standards especially to level 3 of the code for sustainable homes would significantly increase the cost of construction and ultimately cause affordable housing schemes in many cases to either become unviable. A high quality of design and high standard of market houses can be achieved without necessarily matching RSL standards.	In practice, it is unlikely that a mixed development will be refused planning permission on the basis that the Interim Planning Guidance on affordable housing requires higher design standards. Such a decision is likely to be lost on appeal, as the IPG carries less weight than adopted Local Plan policies. The quality of design and construction in open market developments is an important issue, but it is an issue that should be addressed by the Core Strategy. Appellants have a strong case that the IPG is exceeding its legitimate remit on affordable housing by seeking to raise design requirements in other developments. Consequently the reference in the IPG to market homes being built to the same standards as affordable homes, has been removed and amendments made to the requirements for affordable housing to meet level 3 of the Code for Sustainable homes in advance of their 2010 general introduction.
25	Turnbull Tweedale	Affordable housing will be transferred to a RSL at no more than 60% of the nominal cost of construction (paragraph 5.17), how is this percentage justified?, and how is the remaining 40% paid for?	Following the Shropshire RSL Developers Sub-Group on 20 April and a follow-up meeting on 24 April, a consensus appeared to emerge that it is better not to specify the price to be paid by RSLs for affordable housing on mixed developments. Both RSLs and developers prefer the negotiating flexibility that currently exists in most parts of Shropshire. Consequently reference to a set price has been removed from the IPG.
25	Turnbull Tweedale	The third bullet point in paragraph 5.17 states that the RSL will exclude any right to buy/ acquire – however this goes against national policies and	The right to acquire is removed in named rural parishes. The majority of parishes in Shropshire are so named in The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the West Midlands) Order 1997

		the right to buy as established in the 1980 housing act (and any amendments/ re-enactments of that order), and the same complies to the fifth bullet point.	(Statutory Instrument SI1997/620). Regarding restrictions on staircasing to full ownership, section 106 agreements are widely and successfully used across England in the manner proposed in the IPG.
28	Taylor Wimpey UK	Contradictory advice is given between paragraph 5.5, which suggests that the Council will provide a schedule of the mix of affordable housing tenures and house types, and paragraph 5.7, which suggests that the mix should reflect the market housing mix. Given the emphasis on pre-application consultation with the Council's housing manager, we consider the former should be provided as a steer from the Council.	Point accepted. The IPG has been amended accordingly.
28	Taylor Wimpey UK	Paragraph 5.10 says it may be desirable to "weight" the stock profile towards larger or smaller homes if this would help remedy an identified need deficiency in the local area. It is not the role of new developments to remedy existing deficiencies. The scheme mix should be determined by the identified housing need with regard given to scheme viability also.	It is accepted that reference to identified housing need would be preferable to the current wording. To avoid conflicts with paragraph 5.5, paragraph 5.10 has been removed.
28	Taylor Wimpey UK	It is increasingly important to RSL partners to establish sensible management clusters as opposed to the over used phrase of "pepper potting". We would therefore recommend that paragraph 5.11 be amended to make reference to 'management clusters'.	The IPG has been amended accordingly. (See also response to the same point made by respondent refs 1 & 30.)
28	Taylor Wimpey UK	Removing permitted development rights is wholly unreasonable. Conditions restricting permitted development rights should only be used where there will be a clear detriment to either amenity or environment, as set out in Circular 11/95. It removes the opportunity for a dwelling to be increased in size as a family grows which in turn artificially increases housing need.	It is accepted that, on mixed developments, the affordable housing should not be treated differently from the market housing. Consequently paragraph 5.13 has been removed (although restrictions remain for exception sites). Furthermore, the issue of accommodating family growth has been addressed in additions to section 4.

28	Taylor Wimpey UK	The transfer of affordable housing prior to occupation of the first open market dwelling (paragraph 5.17) is entirely unworkable and not commercially viable. We would propose transfer of the affordable dwellings prior to occupation of 60% of the open market dwellings, or in line with a delivery schedule to be agreed with the Council as this provides a more deliverable solution.	Point accepted. Paragraph 5.17 amended accordingly.
28	Taylor Wimpey UK	Similarly, there should be no reference to the transfer price of the affordable dwellings to a RSL. This is a commercial matter between the two parties.	Following the Shropshire RSL Developers Sub-Group on 20 April and a follow-up meeting on 24 April, a consensus appeared to emerge that it is better not to specify the price to be paid by RSLs for affordable housing on mixed developments. Both RSLs and developers prefer the negotiating flexibility that currently exists in most parts of Shropshire. Consequently reference to a set price has been removed from the IPG.
28	Taylor Wimpey UK	RSL should be replaced with agreed 'Affordable Housing Provider'.	Point accepted. Paragraph 5.17 amended accordingly
28	Taylor Wimpey UK	The 5 th bullet point in paragraph 5.17 will affect the transfer price to a RSL that will be achievable for any shared ownership dwellings. There are potential legal difficulties in restricting staircasing on houses and we therefore request that this be removed.	The right to acquire or enfranchise is restricted in designated rural areas. Most parishes in Shropshire are so designated in Statutory Instrument 1997 No. 620, thus removing the legal difficulty referred to in rural areas.. Furthermore, PPS3 requires affordable homes in small settlements to be affordable "in perpetuity", and it is well established practice to therefore restrict staircasing in rural areas. In the interests of fairness, the same policy is also applied to urban areas within Shropshire. In the Shropshire context, the distinction between rural and urban breaks down as rural residents in housing need obtain affordable housing where they can, often moving to a nearby market town to do so.
28	Taylor Wimpey UK	The use of planning conditions should be dealt with on a site by site basis as this will depend on matters of design, amenity and viability amongst others. We do not consider there is a need to include this section within the document. See previous comments on the Code for Sustainable Homes and permitted development rights.	Point accepted. Paragraph 5.19 deleted.

30	West Midlands RSL Planning Consortium	Draw attention to the potential for 'pepper-potting' to create management difficulties. We strongly recommend a flexible approach to the arrangement of affordable housing within mixed schemes, in particular the use of small clusters, at a maximum of 10-15 affordable dwellings.	The IPG has been amended to allow small clusters. (See also response to the same point made by respondent refs 1 & 28.)
32	Severnside Housing	The split of affordable housing to outright sales should be flexible to avoid potential restriction of land availability.	The IPG allows flexibility to reflect development viability (section on 'open book accounting'). It proposes a 30/70 split of social housing to affordable homes for outright sale as a <i>starting</i> point for negotiations (paragraph 5.7), but some flexibility is implied.
32	Severnside Housing	Heads of terms appears reasonable, but would welcome the opportunity to help draft the standard 106 agreements for rural and urban exception sites as we have recently negotiated documents with your legal department to ensure that they are 'palatable' to private finance lenders.	Offer noted.
I-101	Stuart Thomas, DM Central Area Manager	The tenure mix relies upon close co-operation with DM officers and Housing Enabling which is welcomed providing that the appropriate SLA or other mechanisms for timely delivery are in place.	The Housing Enabling and Implementation team are establishing their procedures for close working arrangements with both DM and policy.
I-101	Stuart Thomas, DM Central Area Manager	There is scope for improving the design elements of this section to ensure high quality developments across Shropshire.	Paragraph 5.12 requires affordable homes to be indistinguishable from market homes in terms of design standards, construction and external appearance. This means that, in most cases, market houses will have to raise their standards to match those of the affordable homes. Other aspects of design are addressed in the existing Local Plans and go beyond the intended scope of the IPG.

Appendix A: Detailed guidance on single plots for affordable housing

Ref	Respondent	Summary of Comment	Action
1	Shropshire Rural Housing Association	The locational requirements for single plot exceptions are very onerous. Employment opportunities must rather than may influence the conditions.	Reference to employment opportunities has been made clearer.
3	Hereford	Better to state the positive (what is expected in terms of	Existing Local Plan policies remain, and are not superseded

	Diocese	quality of design, local distinctiveness and responding to the landscape and built context) as well as identifying constraints.	by the IPG. Positive wording would imply more of an overturning of existing policies than is in fact the case. The negative wording of this section allows reasons for refusal of an application on an unsuitable site as “in accordance with policy”. If positively worded, the reasons for refusal of an application would have to be “does not meet the requirements of the IPG”, which is less defensible on appeal as the IPG does not have statutory weight.
5	Bridgnorth District Council	Clarify what “would undermine the provisions of the Green Belt” and clarify what “isolated from recognisable named settlements” means in practice?	Clarifications made as appropriate.
5	Bridgnorth District Council	The guidance suggests that a settlement of just two houses, as long as it is named on an Ordnance Survey map, would qualify as a “recognisable named settlement”. Local service(s) or facilities or proximity to a larger settlement is referred to, but does not appear to be a requirement.	IPG amended so that a settlement must be named on a map <i>and</i> have services, or employment, or be within easy reach of a settlement that does have these facilities.
5	Bridgnorth District Council	Questions that garages are not a traditional design feature and that open timber and slate car ports are more in keeping. It could be argued that garages are a traditional feature and that whether slate is in keeping will depend on what are traditional local building materials in the locality.	Amended to refer instead to the matching the local rural vernacular in both style and materials.
5	Bridgnorth District Council	Expand upon the meaning of “rigid suburban house types” and “specific styles”.	Wording changed to “standardised, off the peg” to clarify the meaning of “rigid suburban” and “specific styles” changed to “reflect the site’s unique context”.
10	Mr A. Dingwall	Financial need must be a pre-requisite. It would, surely, be an abuse of process to “affordably” house anyone who has the resources to purchase in the open market. In Ashford Carbonell the village witnessed such abuse of process in 2008, when South Shropshire District Council very controversially approved the building of an “affordable” bungalow for occupiers who had sold their Ludlow home on the open market. I suggest the financial definition of “need” is the starting point in any application for affordable housing, and is both elevated and strengthened within the policy document, thus ensuring time is not wasted in considering any applicants who meet lesser criteria in the questionnaire.	The draft IPG does not take any account of existing equity, basing its financial assessment purely on current income. This allows households to utilise their existing equity if necessary (for example to provide a pension). The policy that has operated in South Shropshire has prioritised local need and has allowed downsizing by persons with equity in their existing property on the basis of their ‘need’ to stay in the local area for social reasons and the lack of suitable property available. The advantage of this system is that it increases the stock of affordable properties to the long-term benefit of the local community, provided by households who have both the means and the motivation to

			do so. This “win-win” situation can make a significant difference to the long-term housing stock, increasing the amount of intermediate affordable property available. Funding the construction of affordable housing is from householders’ own resources. It is accepted that, under this approach, exceptions to normal planning policy can be made on the basis primarily of local connection rather than financial need alone, on suitable sites.
24	Stottesdon & Sidbury Parish Council	Need to demonstrate that information regarding applicants who cannot afford other suitable accommodation locally needs to be kept confidential to the letting RSL.	Personal information will be kept confidential.
28	Taylor Wimpey UK	This document is not a planning policy document and it is not the role of this document to form new policy. Design should be based on adopted local plan policies and as such the detailed design criteria should not be included within this document.	The IPG is intended to change the approach in Shropshire, and therefore it is appropriate to introduce new requirements. To clarify this point, the role of the IPG in relation to adopted Local Plans has been elaborated in section 1 (Introduction) of the IPG.
28	Taylor Wimpey UK	It is not reasonable to impose restrictions on future extensions, including garage and car ports. If there is no planning reason as to why a garage should not be permitted on site, then such an application should not be refused. This is a matter to be decided on a site by site basis at the time an application is submitted and is not a matter for inclusion within a guidance document such as this.	The IPG has been amended so that garages may be allowed, but count against the 100sqm maximum size (see comments by respondent refs 1 & 5 on this issue above). There is a legitimate planning reason for controlling size, namely to ensure that affordability is maintained and to prevent abuse of the exceptions policy.
29	Natural England	The list of locations considered not suitable should include land on, or near, nationally designated nature conservation sites where adverse impacts may occur.	IPG amended accordingly.
31	Ludlow 21	It is not sustainable to allow sites within a very short car journey of a larger settlement. The criteria should be a 10 minute walk (the pint of milk test) from a range of facilities. A car journey of 3-4 minutes is proportionately high in emissions and is not a sustainable option. New accommodation should be built within walking or cycling distance of employment and necessary facilities.	The criteria for suitable sites have been amended to reflect these concerns.
I-101	Stuart Thomas, DM	There is a danger that the sustainability aspects of such development get overlooked in the documents. There is a	The section defining suitable locations has been tightened to “a location that demonstrably forms part of a recognisable

	Central Area Manager	need to improve the qualifying criteria. From a development management perspective some of the terminology is unhelpful such as “containing several houses” and “offering some local services or facilities”. In practice I could imagine some debate about the level of services and/or facilities provided in a settlement.	named settlement”. The IPG deliberately allows flexibility, in accordance with its emphasis on enabling and facilitating affordable housing.
I-101	Stuart Thomas, DM Central Area Manager	Significant reservations regarding the paragraph in Appendix A in respect of rural enterprises. The word of this is unclear and there is a need to define a “significant number of people” and “accessible”.	Amended to define “significant number of people” as 3 employees, and “accessible” as within 3 km.
I-101	Stuart Thomas, DM Central Area Manager	The 100sqm restriction is appropriate, however DM officers will need to ensure that this is adhered to and there is not unnecessary pressure from applicants	The IPG is very clear that the 100sqm restriction constitutes a firm upper limit on single plot developments. Appendix F has been amended to make this even clearer to applicants. The standard condition in Appendix C has also been amended to ensure that the 100sqm restriction applies to the dwelling including any future extensions.
I-102	DMOG	Recommend tightening the locational criteria for single plots to settlements containing more than a couple of existing dwellings.	Criteria tightened as above.
I-101	Ian Kilby, Head of Development Management	Anywhere with a name on the map might qualify – most places are “3 or 4 minutes car drive” from somewhere with a shop.	The wording of this section has been tightened, but the main thrust of the policy remains to enable and facilitate affordable housing, rather than to restrict it.
I-101	Stuart Thomas, DM Central Area Manager	The design criteria is welcomed and will help development management is ensuring sympathetic proposals. The role of planning compliance will be essential to ensure that dwellings do not abuse the removal of permitted development rights and/or undertake inappropriate landscaping, etc.	Comments noted.
I-101	Dave Parker, Project Manager (Implementation)	Should include criteria to address where there are a number of sites in the same ownership, to favour the site which is in the most environmentally sustainable location. This is based on recent experience of an applicant with land ownership on	IPG amended accordingly.

	on)	the edge of a village, as well as the proposed site.	
I-101	Dave Parker, Project Manager (Implementation)	Should consider whether there is a more environmentally sustainable location likely to come forward that would meet the affordable housing need – eg. from “supported self build” exception sites identified and backed by the Council (eg. trials being explored in the Oswestry area).	IPG amended accordingly.

Appendix B: Model s106 agreement

Ref	Respondent	Summary of Comment	Action
I-103	Graham White, Assistant Solicitor	The operation of the IPG will effectively be policed by the Land Registry, as per section 9.1 of the s106 agreement.	Noted.
I-103	Graham White, Assistant Solicitor	The formula price is set in the s106 at 60% open market value. This may be more than, or less than, the cost of construction.	The s106 has been amended so that the formula price is to be completed on a case by case basis. Explicit reference to the calculation of the formula price has been added to the IPG, as the cost of construction plus nominal plot value of £10,000 expressed as a proportion of open market value.
5	Bridgnorth District Council	One of the criteria of housing need is that households live in the area, defined in the section 106 as within a 15 mile radius. It is arguable that, if the policy is aimed at meeting local need in very small settlements, it is not reasonable to accommodate a household whose only connection is that they live within a 15 mile radius. A 5 mile radius would be more appropriate.	The geographical extent of “local connection” has been reduced to 10km. The Nationwide Building Society has informally given the view that any policy that restricts resales could significantly dissuade lenders (see point below re cascade mechanism). In this regard their view is that the pool of potentially eligible purchasers should not be limited to less than 15 miles. However, in the north of Shropshire, 15 miles covers a far larger population than in the south of Shropshire. In the north, a 15 mile radius includes significant urban populations. It is therefore proposed to reduce the area to 10km and exclude urban areas from this extent. The cascade mechanism should meet financiers’ concerns, as it allows a progressively wider geographical extent over time. In the most sparsely populated areas, it may be appropriate to apply a wider catchment than 10km. In such cases, the model s106 agreement can be adjusted to fit individual circumstances.

I-101	Ian Kilby, Head of Development Management	The cascade approach lifts the local restriction after 6 months. Surely this is a flawed argument in providing affordable housing to meet a local need? The cascade approach might not be required were the development in sustainable locations with a greater demand for affordable housing rather than built throughout the countryside?	Amongst the existing permissions for single plot exceptions sites (obtained under South Shropshire District Council's policy) it has become apparent that difficulties in obtaining mortgage finance is preventing the construction of some affordable homes. This may be in part due to the credit crunch. Nevertheless, it underlines the importance of ensuring that the policy is acceptable to banks and building societies. The cascade mechanism is essential to ensuring that mortgage finance is available, as it reduces the risk to the bank of being unable to sell, by widening the pool of potential purchasers relatively quickly.
23	Worthen with Shelve Parish Council	If the property is sold on the open market under section 2.9 of the section 106, the requirement to pay the Council 50% of the difference between the sale price and the formula 'affordable' price is excessive.	An exception site is only given planning permission because of the benefit to the community over the longer term. In the event that the property is lost as an 'affordable' home, it is essential that the Council recovers some of the community benefit, for reinvestment in another affordable property. To not do so would result in the policy being seen as a potential give-away to a few lucky individuals and result in open market housing being built in inappropriate locations contrary to well established planning principles.
23	Worthen with Shelve Parish Council	In the occupancy cascade, the three month period before the property is offered beyond the local area is too short.	There is a conflict between obtaining mortgage finance and reserving the property for local people. The balance, in order to attract lenders, requires a fairly rapid widening of the pool of potential purchasers. In practice tighter restrictions simply prevent schemes from obtaining funding at all.
I-102	DMOG	Concern about the 15 mile limit – locational qualification needs tightening.	Reduced to 10km.

Appendix C: Standard conditions for exception sites

Ref	Respondent	Summary of Comment	Action
1	Shropshire Rural Housing Association	Code level 3 is below the Homes and Communities Agency's expectation of Code level 6 in the not too distant future.	Noted.
21	Mr Gomersall	100m2 is on the small side for a family house.	In rural areas, family homes tend to be larger than in urban areas, where 100m2 is relatively generous. For families in genuine need of affordable housing, price is usually more critical than space. Nevertheless, this section of the draft IPG has been expanded to allow some flexibility where a family would otherwise be overcrowded.

Appendix E: What is affordable housing

Ref	Respondent	Summary of Comment	Action
3	Hereford Diocese	Presumably the 'worked examples' showing rent levels and home ownership levels will have to be reviewed regularly and updated in order to retain their value.	The purpose of including worked examples in the consultation draft was to illustrate the real costs of affordable housing for the benefit of individuals unfamiliar with the terminology. Many enquirers assume 'affordable' housing includes houses of £180,000, for example. The 'worked examples' may be better extracted from the IPG and produced with accompanying leaflets and guides, as these can be easily updated on a regular basis.
21	Mr Gomersall	£1,300 per m2 cost of construction is fairly high and more than any of the houses I have worked on in all markets sectors.	The standardised cost of construction applied by the IPG to value single plot exceptions sites includes the <i>whole</i> scheme, covering site infrastructure costs, architects' costs, etc.
28	Taylor Wimpey UK	The definition or requirements for private affordable rented housing as set out mean that the product will never be delivered. The purpose of subsidised private rented units is to offer an alternative tier of accommodation to people in need. We would therefore propose that the text be amended to allow for rents to be charged at 80% of open market rents, as is the case with Intermediate rented products.	Intermediate rent has been added to the definitions of affordable housing options.

28	Taylor Wimpey UK	It would also be appropriate to incorporate shared equity products and New Build Homebuy products within the definition section.	Shared equity and new build Homebuy products, like housing benefit, are a financial mechanism attached to the household rather than the property. Appendix E refers to affordable properties only, as is appropriate in a IPG relating to new development. The introduction to appendix E has been amended to clarify this point.
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Appendix F: Local needs information required

Ref	Respondent	Summary of Comment	Action
3	Hereford Diocese	It is important for this data to be updated regularly in order for it to retain its value and to provide a robust case for when the proposed provision of affordable housing is challenged, either by applicants or third parties.	Evidence of housing need has to be included in the IPG document and will inevitably become out-of-date in time. Updates will be produced in the forthcoming sub-regional housing strategy (expected 2010) and in future updates to the Strategic Housing Market Assessment (periodic updates expected every few years).
I-101	Ian Kilby, Head of Development Management	Why is private rented accommodation excluded from Appendix F?	Private renting is included under "tenure" in criteria A / 2/ (i). Households in Housing Association property are "fast tracked" because a single plot affordable home would free another affordable property elsewhere.
I-101	Ian Kilby, Head of Development Management	Does the applicants' existing accommodation <u>have</u> to be unsuitable?	The applicant is expected to clearly express why they have a need. There are sufficient categories within this section that most accommodation will meet the criteria.
I-101	Ian Kilby, Head of Development Management	It is not clear whether an applicant has to meet all or some of the criteria, and how the results would be evaluated.	Amended to be clearer.
I-101	Stuart Thomas, DM Central Area Manager	Recognise the importance of gaining Parish or community support, however it is unclear how this would be provided objectively.	The Parish Council will be asked to confirm matters of fact regarding the applicant's link to the local area. Applicants are expected to be proactive in approaching the Parish Council, before applying. The Council will brief Parish Councils regarding the procedure, making it clear that Parish Councils' role at this stage in an application is only to confirm factual information in an objective manner.
I-101	Stuart	Potentially a significant number of the local population	The definition of "local" has been amended to refer to the

	Thomas, DM Central Area Manager	could meet 3 of the “connections” and perhaps there is a need to “tighten up” on this aspect of the document.	parish in most cases.
I-102	DMOG	Document wording needs changing as it suggests parish council “support” is needed.	Amendments made to IPG.

Appendix G: Evidence of need for affordable housing

Ref	Respondent	Summary of Comment	Action
I-101	Ian Kilby, Head of Development Management	Reference to access to funding, in particular mortgages and the loan to value ratios being offered by lenders – in some cases 25% deposits required?	Reference added.

Sustainability Appraisal

Ref	Respondent	Summary of Comment	Action
31	Ludlow 21	It seems irrational to consider anything but the long term in relation to future planning, even more so if the frame of reference is a consideration of future sustainability.	The Sustainability Appraisal follows government guidelines, which include an assessment of short term, medium term and long term effects.