

Local Housing Strategy 2021 – 2026 Consultation Response – September 2021

Over 150 responses were received via the online questionnaire and via direct feedback, resulting in over 600 questions and comments. As a result of the volume of feedback, we have selected comments that highlight the main themes of the feedback, or those that raise particular issues and have provided responses below:

Priority 1 Maximise the amount of affordable housing to rent or buy.

We asked to what extent you agreed with this priority, 142 responses were received as follows:

91 fully agreed – 64%
42 partially agreed – 30%
9 did not agree at all – 6%

1.1 Feedback - What is affordable housing?

HC Response

Annex 2 of the National Planning Policy Framework (NPPF) defines affordable housing as 'Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)'. A full list of affordable housing tenures is listed in the affordable housing supplementary planning document [technical data](#).

Below is a summary of some of the affordable housing products that are available in Herefordshire:

- Affordable rent (no more than 80% of local market rent including any services charges).
- Social Rent – Owned by local authorities or registered providers, rents are in line with guideline target rents that are determined through the governments rent standards.
- Starter homes – This is a government tenure that has to be discounted by at least 30% below market value.
- Discounted market sales housing - This is a government tenure, which has to be discounted by at least 20% below market value.
- Low cost market - This is a local tenure through which affordable properties are sold at a discount. Eligibility is determined with regard to local incomes and local house prices. The local authority sets the discount thresholds.
- Shared equity – 100% of the title is transferred to the qualifying purchaser at no more than 80% of the open market value subject to a legal charge in favour of the council for 20% of the unit equity value.
- Rent to buy – Housing provided by RPs that is let at an affordable or intermediate rent for a defined period to a household that wishes to buy but are unable to save for a deposit.
- Shared ownership – under the terms of the lease by which a lessee may acquire a share or shares of the equity from the RP who retains the remainder and may charge a rent.
- First Homes - This is a new tenure that has been introduced by government from 28th June 2021 as is housing that is provided for first time buyers as a minimum discount of

30% of market value, which applies on first and future sales. There is a £250,000 price cap and it is restricted to households with a combined income of £80,000 per annum.

- The local housing strategy sets out the challenges around affordability; this information is taken directly from the Housing Market Area Needs Assessment (HMANA), which is an assessment of housing need in Herefordshire that is carried out every 5 years and forms the foundation of our strategic documents and plans for that period.
- The Council will need to be satisfied that rental levels, service charges and low cost home ownership costs will be affordable both initially and in the long term to occupants. The administration have been clear in their ambition to build truly affordable homes for local people, both in terms of rent and running costs.

Proposed changes to local housing strategy – this definition will be added to the glossary.

1.2 Feedback - We need affordable housing but not in villages where there are no amenities or public transport.

HC Response:

- Infrastructure is a challenge in rural locations; this is acknowledged in the current Core Strategy. Larger developments have to help address these challenges through their design and through section 106 contributions for local amenities, but they don't directly contribute to the revenue costs associated with public transport etc.
- The government have recognised the need for improved bus services in the National Bus Strategy for England and have invested in some rural mobility pilots across the country to trial on demand bus services for rural or suburban areas.
- There is a defined need for affordable housing in rural areas for parishes across Herefordshire, evidenced by both in the HMANA and in Neighbourhood Development Plans (NDPs). Many NDPs contain local level policies regarding affordable housing and are considered alongside the policies of the Core Strategy. The policies within NDPs can differ from parish to parish. NDPs have the ability to allocate sites specifically for affordable housing. NDP's are taken into consideration when planning permission for developments is being sought.
- The council have recently published an affordable housing supplementary planning document to give developers further guidance on the issue of affordable housing. This document is supplementary to the Core Strategy and existing policies, and is a material consideration in planning decisions.
- Policy SC1 in the Core Strategy outlines the planning policy requirements around social and community facilities in Herefordshire – extract below:

Development proposals which protect, retain or enhance existing social and community infrastructure or ensure that new facilities are available as locally as possible will be supported. Such proposals should be in or close to settlements, have considered the potential for co-location of facilities and where possible be safely accessible by foot, by cycle and public transport.

New development that creates a need for additional social and community facilities that cannot be met through existing social facilities - will be expected to meet the additional requirements through new, or extension of existing, provision or by developer contributions which meet the relevant tests of paragraph 204 of the National Planning Policy Framework (NPPF).

Proposals involving the provision or expansion of social and community facilities will be expected to provide publicly accessible toilets (including facilities for disabled people and baby changing).

Proposed change to Local Housing Strategy – Rural infrastructure challenge be acknowledged in strategy.

1.3 Feedback: We need to ensure that people, especially young people, stay in the county.

HC Response

- It is important that people of all ages can afford to live in their local community. The need for affordable housing in rural areas is evidenced in the HMANA and in NDP's for parishes across Herefordshire.
- In 2017 the government amend the NPPF so that at least 10% of the homes on developments of 10 or more units would be classified as 'affordable'.
- As it stands, local authorities can insist that developers include affordable housing on their sites as a condition of granting planning permission. We do this in Herefordshire and have thresholds of between 25% and 40% affordable housing per development (of over 10 houses) depending upon the area.
- The strategic housing team negotiate with developers about the number and composition of this percentage. There are times when we might end up taking fewer units in order to deliver a bespoke solution for a vulnerable cohort e.g. flats for people with learning disabilities or a fully adapted bungalow for someone who needs a wheelchair accessible home.
- It is noteworthy that many rural development sites are for 10 or less homes making it more difficult to secure affordable homes for people in rural communities. It is also acknowledged that there are sometimes viability issues on smaller sites.
- There are policies within the Core Strategy 2011-2031 that relate to Affordable Housing; Policy H1 establishes affordable housing targets, Policy H2 refers to rural exception sites in relation to affordable housing in rural areas and Policy H3 ensures there is an appropriate range and mix of housing.
- The governments First Homes initiative will now account for 25% of the affordable sum e.g. If we have a site with 100 houses on it and 35 of them are affordable, then 9 (25%), (rounded up from 8.75) of the 35 will now be first homes.
- First Homes are intended to be homes available to buy with a minimum discount of 30% below their full market value. Local authorities will have the ability to prioritise these homes for local people and / or key workers, as required locally, and require higher discounts if they can demonstrate a local need .These homes will be capped at a total cost of £250,000 and, like our other affordable and discounted market housing will be subject to restrictions which ensure that the homes retain their discount in perpetuity (subject to certain specific exclusions). They will need to be sold on to other eligible purchasers at a discounted price, ensuring communities continue to benefit from these affordable homes for generations to come.

Proposed changes to the Local Housing Strategy – additional detail to be added around this issue.

1.4 Feedback: Herefordshire is in general a low pay area; there are a large number of people unable to afford private rent/mortgage.

- Affordability is an ongoing challenge as house prices have risen and wages have not increased at the same rate.
- The council continue to negotiate affordable housing on all developments with more than 10 properties in line with minimum thresholds set out policy H1. There are now sites

coming forward in Herefordshire offering 100% affordable housing, with a mixture of tenures.

- The council has determined to try to increase the number of affordable homes for rent in the county by 1000 over the next 4 years.
- We understand that the delivery of affordable housing does not address the wider socio-economic challenges faced in Herefordshire alone.
- The council's revised Economic Development Vision sets out a number of private sector investment opportunities and what the public sector can do, in an enablement role, to create the conditions to encourage economic growth. It identifies key challenges as including low wages and levels of productivity, with low knowledge-focused economic activity, the need to further develop the skills base and to improve infrastructure including broadband, housing, employment sites and road infrastructure. It targets creating 10,000 new jobs over the period to 2031 aligned to the delivery of 16,500 homes over the Local Plan period (2011-31)¹.

Proposed changes to local housing strategy – none, this issue is already covered in the strategy.

1.5 Feedback: Agricultural land is needed to feed all the people that houses are being built for. Better consideration should be given to the use of brownfield sites and properties that are in need of being made habitable again.

- A wide range of sites are being considered for the development of council owned affordable housing including brownfield sites, empty properties and shops.
- In March 2021, the Government issued new planning law. The new rules support the conversion of commercial premises into residential accommodation with the dual aim of creating new homes while also giving high streets a new lease of life – removing eyesores, transforming unused buildings and making the most of brownfield land.
- As a local authority, we have to set out a clear plan for development. This is delivered through the Core Strategy, which includes specific areas and sites that can be developed across the county in line with national guidance.

Proposed changes to local housing strategy – none, as this is primarily a planning issue.

1.5 Feedback: Each housing estate should ideally be a cross mix of housing types, with normal houses ready to go to market, mixed in with affordable homes to rent and affordable homes to buy. We must maintain a mix of housing types on each estate to ensure a cross section of people and progression.

HC Response:

- Our approach to mixed developments is set out in Policy H3 within the Core Strategy;

Residential developments should provide a range and mix of housing units, which can contribute to the creation of balanced and inclusive communities. In particular, on larger housing sites of more than 50 dwellings developers will be expected to:

1. provide a range of house types and sizes to meet the needs of all households, including younger single people;

¹ HMANA p 65.

2. provide housing capable of being adapted for people in the community with additional needs;
and

3. provide housing capable of meeting the specific needs of the elderly population.

- On sites that come forward as 100% affordable we would be looking for a range of tenures e.g. for sale, rent and rent to buy in order to ensure a cross section of people and progression.

Proposed changes to local housing strategy – none, this is already acknowledged in the strategy.

1.6 Feedback: Stricter reinforcement of section 106 provision and less tolerance of strategies adopted by developers to circumvent their obligations / Affordable housing should remain affordable for the next tenants or buyers.

HC Response:

All affordable and discounted market homes are affordable in perpetuity including those that are rented and those that are sold as shared ownership; this is part of the planning conditions. The same approach has been adopted with the First Homes initiative. Section 106 agreements are used to create a covenant on these properties, ensuring that they are re-sold as affordable in perpetuity. This information is also added to land registry records when properties are registered and picked up in land searches.

This is a separate issue from right to buy and right to acquire which are both government initiatives over which the Council has no control. The Right to Buy allows most council tenants to buy their council home at a discount. Herefordshire Council transferred our housing stock to Herefordshire Housing Limited in 2002. People living in Herefordshire Council owned property when it was transferred to Herefordshire Housing Limited in 2002 would have a 'Preserved Right to Buy'. Right to Acquire allows most housing association tenants to buy their home at a discount.

Proposed changes to Local Housing Strategy: Definitions to be added.

1.7 Feedback: We are experiencing a shortage of affordable homes. Hereford Council is extremely lax, in my opinion, in enforcing developers to provide QUALITY affordable homes. So often affordable is seen to mean small, cramped and unkempt.

HC Response:

Housing need, including the number of bedrooms needed and tenure are assessed in detail in the HMANA and broken down by area so that when negotiations with developers are taking place we have the detail of what housing is needed where.

This is further evidenced through data collected from the Housing Register (Home Point Herefordshire) for the county which provides more detail about the level of affordable housing need experienced by households in the county that require rented accommodation. The register shows that there is a high requirement for small affordable dwellings; however, it also shows that there is a need to provide larger dwellings of four and five beds. The information from the Housing Register also helps us to understand where housing is needed as applicants can state their preferred location.

All affordable homes are built to building regulations standards and are therefore no smaller than homes built for the open market. RPs often build to higher standards such as the Nationally

Described Space Standards. Core Strategy Policy SD1 - 'Sustainable design and energy efficiency' sets out criteria which development should follow. A Sustainable Building Standards SPD is currently being drafted which will add further detail on what is expected of housing in the future.

The quality of new homes is managed through planning and building control systems. The government have introduced a new future homes standard for housing, which will see changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. Please see Q 2.3 for more details.

Proposed changes to Local Housing Strategy – Include information about Future Homes Standard in Strategy.

1.8 Feedback: We need social housing probably more than affordable homes. Local young adults cannot afford 'affordable' homes. Or the developments need to be contractually obliged to only offer 'affordable' to local families. Generations of families have lived in these areas and are now forced to the towns.

HC Response:

Social housing falls under the government's definition of affordable housing. There are a range of rent levels that can be used; social rent levels are determined through the national rent regime whereas affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent.

There are over 11,000 units of affordable housing in Herefordshire; this includes a mixture of rented units and home ownership options. Affordable housing to rent in Herefordshire is mainly provided by RPs. There is more information about this subject on our [website](#).

Most RPs secure Homes England grant funding towards the developments of new homes in order to make them financially viable. Homes England funding can only be used for homes to be let at affordable rent levels; this is not a policy that the council can change. We can, and do negotiate social rent through planning gain, but only where there is no Homes England grant in place.

Most new affordable properties in Herefordshire are subject to section 106 agreements, which means that they are offered to people with a local connection (live, work or family or special circumstances) in the first instance (except for grant funded shared ownership properties developed by RP's). If there is no one with an immediate local connection the offer is cascaded to surrounding parishes on the same basis. If there are no local people who meet the qualification criteria for the property it might be offered more widely to someone in Herefordshire in need of an affordable property. When the property becomes available again, the same process for allocation is followed.

Proposed changes to Local Housing Strategy: Definitions to be added in glossary.

1.9 Feedback: It is not clear, given the lack of up-to-date realistic assessments of need (see p5) and the much delayed HMANA (see p2), how any draft housing strategy can be produced. Maximising the number of "affordable homes to buy or rent" without any understanding of true need would distort the market.

HC Response:

Covid 19 impacted on the face to face research elements required for the HMANA and it was delayed until this could be completed. The desktop research for the HMANA was in draft form whilst the Housing Strategy was being drafted, so the data within the strategy is based on the latest needs analysis. The HMANA has been finalised and is now available on the Herefordshire Council [website](#).

Proposed changes to Local Housing Strategy: None.

1.10 Feedback: The strategy provides a broad basis for increasing housing supply which is good but there needs to be some more recognition of how true affordable housing can be delivered other than via s.106 planning gain. Housing Associations play an important role in this, especially when delivering stalled sites, either on or off market and delivering over and above the required affordable housing percentage from planning gain. This should be further explored in the strategy to allow a recognition that housing may be delivered in this way, i.e. not just planning gain or exception sites by working in partnership to deliver medium to large sites with a range of affordable tenures.

HC Response:

The councils County Plan states that the council will work with registered providers and developers to enable them to build more homes for sale and for long-term rent. The local housing strategy is an over-arching document, more detail about affordable housing can be found in the Affordable Housing SPD. This supports registered providers in bringing forward 100% affordable housing sites and confirms that there needs to be an appropriate range of affordable tenures and house types to meet the needs of all households.

Proposed changes to Local Housing Strategy: Additional information re RP contribution to delivery of affordable housing added to strategy.

1.11 Feedback: Instead of lots of new builds, renovate old & unused properties. Many eye sores about Herefordshire due to neglect & no occupancy.

HC Response:

The council are actively encouraging property owners to do this and have a dedicated empty property officer in post to support people to bring their empty properties back into use. We can offer grants to support property owners, who meet the schemes criteria, to bring their properties up to a suitable condition for rent, and where incentivising doesn't work, we have a range of enforcement powers that we can use, although this does take time. This is picked up in priority 3 of the draft housing strategy. There were 284 long term empty² residential properties in Herefordshire in January 2021. Please note that this does not include empty commercial properties. For more information about our approach to working with empty property owners, please see the [Empty Property Strategy](#).

As outlined in the response to Q 1.5 , the Government issued [new planning law](#) in March 2021. The new rules support the conversion of commercial premises into residential accommodation with the dual aim of creating new homes while also giving high streets a new lease of life – removing eyesores, transforming unused buildings and making the most of brownfield land.

² Note - The Ministry for Housing, Communities and Local Government (MHCLG) classes problematic empty properties as those that are inactive in the housing market and have been empty for more than 6 months.

Proposed changes to Local Housing Strategy: Include information about new planning law in strategy.

1.12 Feedback: The availability and affordability of low cost and rental accommodation is poor in HR9.

HC Response:

The HMANA is divided into seven housing market areas, for the Ross on Wye area it states the following:

Over the 2011-20 period, total net completions of 950 dwellings have been delivered in the Ross on Wye area. This has supported housing stock growth of 0.7% per annum, which is marginally above the County average. Levels of affordable housing delivery has however been relatively poor with 11% of all completions being delivered as affordable housing which is the second lowest in Herefordshire above Golden Valley.

Analysis in the HMANA suggests a need for 75 units of rented affordable housing per annum moving forward, with over two-thirds of this need found in the rural area beyond the market town of Ross on Wye. The analysis also identifies a relatively high need for affordable home ownership almost all of which falls within the rural area of the housing market area with a total of 35 affordable home ownership homes needed per annum. Please see p 157 of the HMANA for full details.

16 units of affordable housing have been delivered so far in 2020/21 with another 33 planned. Over 100 more affordable properties are currently being brought forward through the planning process in the HR9 area at sites on Tanyard Lane, Edenstone and Hildersley.

Proposed changes to Local Housing Strategy: None, information available in HMANA.

1.13 Feedback: The heavy handed (and distracting) focus on Affordable Homes throughout the document is disingenuous and 'sound bite' driven, especially considering the long term and persistent lack of ANY housing delivery in the county over the past 20 years. It is the lack of overall housing delivery of ALL SORTS that should be the greatest concern throughout any housing strategy. By HC persistently refusing to meet and increase housing delivery they have contributed to the gap between earnings and house prices. There are simply not enough houses available to buy and this makes the current stock more expensive.

Houses in Herefordshire are amongst the cheapest in the country and so we need to look at supply and how to increase wages rather than increase Social Housing. Registered providers are well funded, profitable and yet reluctant to deliver the specific stock they are responsible for. This needs addressing outside of a housing strategy. Councils should not be directly involved in housing delivery, even if it is AH. Affordable Housing needs more and better focused assessments (and eligibility tests). Currently the assessments are not tested, verified or specific and are based on desire/aspiration which is tilting the 'perceived demand'.

Herefordshire NEEDS younger working families/people to move to the county and these people (as well as many already here) do not need or qualify for AH - they need good homes of all sorts in all locations. Rather than just focusing upon the small number with local connections or age based needs we must look at accelerating our delivery of a much broader type of house and in unprecedented numbers to catch up. The heavy, repetitive and unjustified focus upon 'affordable' homes will cause more damage to our already broken (understatement) housing delivery model.

HC Response:

The issues outlined in this feedback are primarily linked to planning policy. The Core Strategy provides the policy for the development of all housing in Herefordshire. The Core Strategy is currently under review and will be subject to consultation when drafted. The local housing strategy does not seek to replicate the Core Strategy, but to draw out key issues around housing in Herefordshire. The HMANA indicates that there is a need for 597 affordable homes per annum, this data combined with socio economic issues linked to affordability suggest that it should be a priority within the Housing Strategy.

Wage growth, skills development and increasing the number of skills job opportunities in Herefordshire is an ongoing focus for the council as outlined above.

Eligibility for the purchase of affordable homes is assessed through a standard format which seeks verification of local connection, affordability etc. The qualification criteria state that the household income must be under £60,000 for a joint application or under £40,000 for an individual. This means that young people and families are likely to be eligible.

Office for national statistics (ONS) data indicates that the average house price in Herefordshire in March 2021 was £257,284. Average house prices in the West Midland in March 2021 were £220,982 and across England they were £274,615; although this average includes London and the South East where property prices are significantly higher³. This data indicates that houses in Herefordshire are therefore not amongst the cheapest in the country.

Between 2011 and 2020/21 6253 new homes were delivered in Herefordshire, of this 1169 were affordable. The vast majority of the delivery of affordable housing across the county is attributable to RPs. An element are for affordable home ownership products designed to help first time buyers.

Proposed changes to Local Housing Strategy: None, there is sufficient evidence to suggest affordable accommodation is a priority for Herefordshire.

1.14 Feedback: Use a definition of affordability that more closely resembles the financial means of people living in Herefordshire, as opposed to a relative proportion of market value. Consider Community Land Trusts as a method of securing the properties affordability in perpetuity, which prevent the properties being sold to anyone other than the community organisation. To enable CLT involvement Herefordshire Council should have a policy that specifically sets out how developers and/or landowners must consider a community led approach as part of their development.

HC Response: The NPPF defines affordable housing and the Council's technical data provides up to date affordability data for Herefordshire. In order to ensure that affordable housing is truly affordable the Council use a range of housing products and tenures including:

- Discounted market sales housing - This is housing that is at least 20 percent below local market value. Eligibility is determined with regards to local incomes and local house prices. It should include provisions to remain at a discount for future eligible households.
- Low cost market housing - This is housing that is sold at a discount of at least 20 percent below local market level. In Herefordshire any discount should be sufficient to meet local housing needs. The discount set is applied using the assumptions in social rent and

³ <https://www.gov.uk/government/news/uk-house-price-index-for-march-2021>

affordable rented housing above. Eligibility is determined with regard to local incomes and local house prices. It should include provisions to remain at a discount for future eligible households.

Affordable housing products are affordable in perpetuity as outlined in Q 1.6.

The Council meets regularly with CLTs to support them to progress their housing plans and aspirations. The Core Strategy does not currently include a specific policy in relation to CLT's, but this will be considered as part of the Core Strategy review process.

Proposed changes to Local Housing Strategy: Add definitions of affordable housing tenure's to strategy in glossary.

Feedback from consultees re: What additional actions could contribute to meeting this priority?

- Increase development on brownfield sites and derelict land.
- Build council houses and rent them at reasonable rates. Council houses are an asset which councils can borrow against.
- Better road infrastructure is needed to open up land for housing and associated facilities.
- What a great opportunity was missed by not building the western by-pass.
- Lobbying our MPs to change the planning laws.
- Careful planning is necessary in order to create a greater share of affordable homes, whilst doing so in a way that enables healthy, balanced communities to thrive.
- Enforce extra conditions relating to design (and running costs, and total lifecycle costs) as well as local amenities, integrated services, integrated communities, and transport.
- Only build 'affordable homes' in cities or towns where residents have access to shops & transport & neighbours.
- Projects like the small fishing villages should be done in countryside communities to protect housing for local people and local workers. Houses in the countryside are bought and extended which is always granted but new smaller houses are not allowed by Herefordshire council, even affordable houses they decline, how and why I do not know as they are themselves encouraging an ageing population by their housing policy.
- To build in towns and cities with walkable schools, doctors, pharmacy's, shops and public transport
- Affordable transport links to the City. Park and ride to avoid congestion in the City.
- Developers should contribute, regardless of the number of dwellings being constructed.
- Either have better public transport or increase facilities available in rural areas.
- The council may need to be (legally) creative to ensure a funding stream for this.
- Instead of lots of new builds, renovate old & unused properties. many eye sores about Herefordshire due to neglect & no occupancy.
- Brown field sites should be considered for housing.
- Only construct in outer village areas where road access is not via small villages
- Allowing Housing Associations to put in 100% grant into 100% affordable schemes where there is a S106 attached to the site.
- Affordable accommodation should remain in the ownership of the council/housing association.
- We needs eco homes to help wildlife
- If you meet your 5 stated objectives, you will be doing well!
- More council affordable housing, stop selling houses off
- Make developers keep to their word regarding affordable housing.

- Enable village and town plans to be followed to build affordable housing and keep our young people in the county
- Find ways to reduce the cost of land for building, this mainly drives the sale price.
- Better infrastructure ,road, buses, and medical facilities

Priority 2 Improve health through housing

We asked to what extent you agreed with this priority. 137 responses were received as follows:

100 fully agreed – 73%

25 partially agreed – 18%

12 did not agree at all – 9%

2.1 Feedback: You need infrastructure, providing cycle tracks, play areas and other opportunities for extending physical activity is important.

HC Response:

These are planning issues and dealt with through the Core Strategy, rather than through the Local Housing Strategy. The Core Strategy states that:

“Open space, sports and recreation facilities are an essential part of sustainable communities. They need to stand the test of time, be where people want to live, and enable people to meet their sporting and recreational aspirations and potential. Planning policies for open space, sport and recreation are fundamental to delivering the broader objectives of achieving:

- *networks of accessible, high quality open spaces and sport and recreation facilities in both urban and rural areas, which meet the needs of residents and visitors, are fit for purpose and are economically and environmentally sustainable;*
- *an appropriate balance between new provision and the enhancement of existing provision; and*
- *reasonable certainty for developers and land owners in relation to the requirements and expectations of local planning authorities in respect of open space, sport and recreation provision.”⁴*

There are a range of policies in the existing Core Strategy that set out the approach to the development / expansion of community facilities including open spaces, sports and recreation facilities as follows:

- SC1: Social and community facilities
- OS1: Requirement for open space, sports and recreation facilities
- OS2: Meeting open space, sports and recreation needs
- OS3: Loss of open space, sports or recreation facilities
- MT1: Traffic management, highway safety and promoting active travel

A sustainable building standards SPD is being created to supplement the exiting Core Strategy, whilst it is being reviewed.

⁴ <https://www.herefordshire.gov.uk/downloads/file/1804/section-5-general-policies>

Proposed changes to Local Housing Strategy: No significant change, as this is a Core Strategy related issue, but will acknowledge infrastructure challenge related to new developments in strategy.

2.2 Feedback: It is a widely accepted fact that deprivation is a major cause of health issues. Mixed housing provides greater community cohesion in a way that encourages engagement with members of a community, whilst also ensuring that the effects of deprivation are mitigated as far as possible.

HC Response:

The councils current approach to getting the right mix of housing types on development is Core Strategy policy H3 outlined above. Herefordshire Council are progressing plans to develop council housing again and will look to build to Net Zero Carbon therefore reducing the cost of energy bills, reducing fuel poverty, deprivation and positively impacting on health.

Proposed changes to Local Housing Strategy: No change required as this is covered in the Core Strategy.

2.3 Feedback: Improve the quality of new homes / All homes should be converted to affordable sustainable green energy / Focus upon delivering carbon neutral homes in new builds (even the big developers will eventually see the value of this for their own pockets!), and retrofitting wherever possible.

HC Response:

The quality of new homes is managed through planning and building control systems. The government have introduced a new future homes standard for housing, which will see changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. The National Housing Federation provide a clear explanation of what this means:

*“Homes built under the Future Homes Standard should produce **75-80% less carbon emissions** compared with current levels and become net zero as the electricity grid continues to decarbonise. The intention is that homes built to the Future Homes Standard will **not need to be retrofitted** with any additional measures or technology to become net zero. The Future Homes Standard should see homes fitted with **low carbon forms of heating**. The expectation is that heat pumps will become the main source of heating system for most new homes. The government has also confirmed that it will introduce an **interim uplift in building standards** from 2021 as a first step towards the Future Homes Standard in 2025. Homes built to the interim standard should produce 31% less carbon dioxide emissions compared to current levels.”⁵⁵*

Feedback from RP partners suggests that they are looking to adopt the 2025 standards as soon as possible in order to future proof their housing stock.

Herefordshire Council are planning to develop affordable homes that meet the future homes standard in advance of it becoming enforceable in line with our [Carbon Management Plan](#).

⁵⁵ <https://www.housing.org.uk/news-and-blogs/news/new-future-homes-standard-building-regulations/>

As a local authority, we are also concerned about the quality of existing housing stock in Herefordshire and its impact on health. Fuel Poverty affects an estimated 13,902 out of 84,028 households (16.5%). This figure is higher than the national level of 13.4% and reflects the challenges that the county faces in relation to the energy efficiency of properties including a large proportion of older, hard to treat 'solid wall' properties, restricted access to mains gas and the resulting prevalence of expensive heating fuel systems⁶. Increasing the thermal efficiency of existing homes is addressed in Q 2.4.

Proposed changes to Local Housing Strategy: Include details of future homes standard and steps being taken to meet this standard. Issues around existing stock already covered.

2.4 Feedback: Heating costs mean the most impoverished and vulnerable people in society are at risk of being unable to heat their homes / Improve insulation to reduce heating costs, consider possibility of switching to renewable sources of energy such as ground/air heat pumps.

HC Response:

The council are involved in a number of initiatives to make improvements to homes with very low EPC ratings e.g. below D and commission the Severn Wye Energy agency to run the Keep Herefordshire Warm service. They offer energy efficiency advice and administer grant funding to help keep Herefordshire residents healthy and comfortable at homes via advice and grants.

Working with the Midlands Energy HUB, we have secured Green Homes Grant Local authority Delivery phase 2 funding to improve the energy efficiency of low-income (fuel poor) households as well as supporting the green recovery in response to Covid-19. This funding will be used to enable an estimated 134 of the most fuel poor households across Herefordshire to be supported with home energy efficiency and renewable heating measures.

The government are due to issue their heat and buildings strategy in September 2021. One of the suggested actions being considered is a clean heat grant for encourage the replacement of gas boilers; this has yet to be confirmed.

Herefordshire Council are keen to address this issue as we develop our own housing plans. We aim to build to Net Zero Carbon therefore reducing the cost of energy bills and reducing fuel poverty and deprivation.

The government have recently launched the social housing decarbonisation fund to enable the retrofitting of social housing. This is a local authority led fund, Herefordshire Council and Shropshire Council are therefore working with RPs to develop an application for this funding.

Proposed changes to Local Housing Strategy: Update Strategy with detail re public Green Homes Grant which was withdrawn since time of writing and replace with information re Green Homes Grant Local authority Delivery phase 2 fund.

2.5 Feedback: We should penalise private landlords whose properties are detrimental to people's health.

⁶ <http://councillors.herefordshire.gov.uk/mglIssueHistoryHome.aspx?IId=50038316>

Herefordshire Council have a wide range of legal duties under housing related legislation. These duties are applied by carrying out programmed inspections of premises, responding to complaints and offering advice. The [housing enforcement policy](#) details the enforcement action that we can take against private and social landlords and the circumstances under which such action would be taken.

People living in housing owned by an RP should seek to address any issues directly with their landlords via their complaints process before contacting the local authority. If this does not work, you can contact the [Housing Ombudsman](#) with your complaint.

Proposed changes to Local Housing Strategy: Include link to housing enforcement policy.

2.6 Feedback: Social housing - I don't like the area that I live in or the property:

HC Response:

In June 2020 Herefordshire Council introduced a new social housing allocations scheme. This includes a new banding (E) for people with a housing want, rather than a specific housing need. Band E offers a greater level of flexibility for tenants seeking to move into different social housing and for RPs seeking to advertise their stock.

Another option would be to ask your current housing provider to add you to their mutual exchange list.

Proposed changes to Local Housing Strategy: None, this is outside the scope of the strategy.

2.7 Feedback: Whilst we fully support all of the intended actions the Council has set out within the draft strategy, greater collaboration could help to promote some of the initiative outlines such as Keep Herefordshire Warm. The Council has acknowledged the impact of poor housing upon the National Health Service (NHS), therefore greater collaboration with bodies such as Herefordshire and Worcestershire Clinical Commissioning Group could help to identify communities where more targeted support would be beneficial. Likewise Housing Associations are also a trusted member of many communities and customers of housing associations may seek support through their housing provider, thus collaboration with Housing Associations would also be mutually beneficial. Whilst improving energy efficiency through promoting grant funding has been highlighted, the strategy this objective could link more closely with Objective 4 to provide a more coordinated approach. The delivery of energy efficiency measures is an optimum time to engage with communities on energy matters for example, ensuring households are on the most suitable energy tariffs. There is also an opportunity to obtain greater feedback on the impact of retrofit upon households, to understand its effectiveness and whether there been any unintended consequences such as condensation or overheating issues. It is critical that learning captured to ensure we deliver energy improvements effectively and to improve the quality of life of households as far as possible.

HC Response:

There is joint working between the council and health providers at a strategic level through Public Health and the CCG as well as on a day to day operational level through social care and other council teams that provide direct support. In addition to this the council have developed [Talk Community](#) as a way of encouraging greater participation and engagement within our communities. This might be checking on a neighbour, collecting a prescription for someone or litter picking, anything that makes a positive difference to the community in which we live in. Talk

Community is co-ordinated by a team at the council and responds to significant events such as flooding and the Covid 19 pandemic, galvanising community action when it is most needed. Talk Community has developed 20 community hubs across the county where local people can find help and advice when they need it including issues around housing. There is also a dedicated website that includes a range of advice and support for the community.

The impact of retrofitting will be measured through evaluation linked to funding opportunities as they arise e.g. the social housing decarbonisation fund. We will use this learning to improve our understanding, inform future funding bids, projects and practices. Information is already being shared across local authority areas around the costs and benefits of retrofitting.

Proposed changes to Local Housing Strategy: Agree that there is overlap between objectives 2 and 3. These will be combined under one priority.

2.8 Feedback: Health and housing are inextricably linked. Crowding in mainly, unimaginative developments of affordable housing leads to exacerbation of social divides and the threat to mental health of all.

HC Response:

The statutory overcrowding standard was first introduced in 1935. In practice, the standard has not been updated since that time. It is currently found in Part X (10) of the Housing Act 1985.

The English Housing Survey 2019/20 found that 9% of social renters and 7% of private renters lived in overcrowded accommodation. Overcrowding is less prevalent among owner occupiers, 1% of whom live in overcrowded accommodation⁷. A bid to change the overcrowding standards as part of the Housing Act 2004 wasn't progressed due to concerns that updating the standard in the absence of a significant increase in affordable housing supply could place additional pressure on local housing authorities. Governments since 2010 have considered and implemented other means to incentivise households to downsize and free up properties for overcrowded households, e.g. the under-occupation deduction from Housing Benefit for working-age claimants in social housing⁸.

The Covid-19 pandemic has highlighted and intensified existing housing problems including overcrowding.

The social housing allocations policy in Herefordshire uses two measures for statutory severe overcrowding, (a) The room standard set out in part 10 of the Housing Act 1985; overcrowded by at least two bed space or (b) failing the bedroom standard of the Housing Health and Safety Rating System (HHSRS) by at least three bed spaces. Only if these standards are met will they be eligible to be added to the housing register in Band A. Where the criteria for severe overcrowding are not met, applicants may fall into Band B 'overcrowding'.

For HMO's the standards are set out in Herefordshire Councils amenity and facility standards.

The Housing Act 2004 introduced a system for assessing housing conditions, known as the Housing, Health and Safety Rating System (HHSRS), which is to be used in the enforcement of housing standards in all types of residential accommodation. HHSRS provisions of the Housing Act 2004 includes 'crowding and space' and these are used by Herefordshire Council's

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf

⁸ <https://researchbriefings.files.parliament.uk/documents/SN01013/SN01013.pdf>

Environmental Health Team to determine overcrowding in preference to the statutory overcrowding standard in Part 10 of the Housing Act 1985⁹.

The HHSRS operating guide outlines the ideal conditions for space depending on age and gender mix, and the size and number of the rooms available for sleeping; these generally mirror the bedroom standard. Unlike all other housing risks, crowding and space hazard is assessed in two stages by considering the property with and without the current occupants.

An Order prohibiting use of the property should only to be served in the event of a Category 1 hazard where there is “severe overcrowding” (the property lacks 2 or more bedrooms based on the bedroom standard) and there is a strong threat to health or safety. In these cases, action should be co-ordinated between all parties including the landlord, Homeless Prevention Team, Home Point and Environmental Health Housing to re-house affected individuals as soon as possible.

Where there is an identified need the council is working with RPs to develop larger properties e.g. 5, 6, 7 beds as required. Discussions are being held with RPs about flexible housing design to enable this whilst ensuring that properties can be easily adapted into smaller units.

Proposed changes to Local Housing Strategy: Include more information about overcrowding and how it is dealt with.

2.9 Feedback: It is not just physical health that is important to address by improving housing design, but mental health too and both can be addressed in broadly the same way by ensuring dwellings are energy efficient, have adequate passive ventilation and natural light. Design and layout play a strong part in health. We see better outcomes from dwellings with access to safe community and private garden space, which have their own front doors to the street, which have trees, which are served by safe cycle and walking routes, which are aesthetically proportioned and detailed and are of good materials. This means we need to deliver developments which are not dominated by motor roads and parking areas and that means we can do denser developments in urban areas which still enjoy access to green space and community facilities with genuine (rather than as now 'lip-service') facilities for safe cycling and walking and public transport and share or pool e-car schemes etc. Developments of apartments dominated by car parking cannot be classed as 'affordable' by using a holistic metric because of the strong association with poorer health outcomes for their residents.

HC Response:

Core Strategy policies ensure that flatted accommodation benefits from shared green space and parking. The council are getting better at understanding the need for a fabric first approach and using this information for the negotiation and design of developments, taking the end user into account.

A 'fabric first' approach to building design involves maximising the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems. This can help reduce capital and operational costs, improve energy efficiency and reduce carbon emissions. A fabric first method can also reduce the need for maintenance during the building's life¹⁰. The council have developed a design guide for future council housing and are also developing a sustainable design supplementary

⁹ <https://www.herefordshire.gov.uk/downloads/file/5225/housing-enforcement-policy>

¹⁰ https://www.designingbuildings.co.uk/wiki/Fabric_first

planning document which will give further guidance to developers whilst the current Core Strategy is reviewed.

Design and layout are regulated by planning and building control and are in line with nationally set standards and legislation. Please see Q 2.3 for information about the Future Homes Standard which will have a significant impact on the costs of heating new homes.

Proposed changes to Local Housing Strategy: None, comments to be passed onto planning colleagues.

3. Improve the quality of existing homes and bring long-term empty properties back into use.

We asked to what extent you agreed with this priority, 140 responses were received as follows:

122 fully agreed – 87%
16 partially agreed – 11%
2 did not agree at all – 1%

3.1 Feedback: I would like to see greater flexibility shown by planners when it comes to turning redundant shops and banks in our market towns into homes.

HC Response:

In March 2021, the Government issued new planning law. The new rules support the conversion of commercial premises into residential accommodation with the dual aim of creating new homes while also giving high streets a new lease of life – removing eyesores, transforming unused buildings and making the most of brownfield land.

This legislation is new and conversions of this type can be costly, so we don't expect to see an instant impact on the high street. It may not be cost effective to improve all long term empty properties. In some circumstances it might be more economical to demolish a building and rebuild on a site, although this very much depends upon the site and its location / potential and any listing associated with the existing building(s) or the site.

The council have been promoting the opportunity presented by accommodation above commercial units in Hereford City. Many of these premises are owned by companies, which can make it difficult to contact the owner directly. Feedback from owners and tenants has identified that one significant barrier to conversion is that many upper floors can only be accessed via the ground floor retail space.

Proposed changes to Local Housing Strategy: Include reference to new planning law.

3.2 Feedback: There is a lot of old and unused and empty properties in Hereford, spending money on them to bring them back to so that they are habitable will help with the waiting list for housing / There are long term empty properties and the increased number of holiday let's is adding to the atrocious lack of housing for people in Herefordshire, in the rural areas particularly.

HC Response:

There were 284 long term empty¹¹ properties in Herefordshire in January 2021. The council can award grant funding to eligible property owners to support them to bring empty properties back into use; in exchange, we ask that the property be let at an affordable rent for a set number of years. Unfortunately there are some circumstances isn't able to change, such as probate issues or where a property owner has been taken into care. There are more details about empty properties on the council website and in our [Empty Property Strategy](#).

Holiday lets can be commercial rather than residential properties. Commercial properties are not within the scope of the Empty Property Strategy or this Housing Strategy.

Proposed changes to Local Housing Strategy: Include some information re empty commercial properties and link to Empty Property Strategy.

3.3 Feedback: The strategy needs to note that underused or empty town centre retail units and empty hotels/public houses, are an opportunity for development into 1 bedroom units for single people, and the retail space converted into businesses linked to the tenants or other local businesses or social enterprises. There are third sector organisations and community groups who would make valuable partners, either as property owners or development partners. The local authority could facilitate and influence this activity through enforcement or the threat of enforcement targeting delinquent or absent landowners.

HC Response:

We are unable to enforce against underused properties or commercial premises; our housing enforcement powers do not cover these premises. The empty property strategy focuses on existing residential housing stock that has been left empty for six month or more and outlines all of the enforcement actions that can be taken.

The council has encouraged owners of commercial properties to convert the accommodation above shops into residential accommodation through leaflet drops and information about grants – please see Q 3.1.

The council has been working with RPs and charitable organisations to look at viable housing options through Project Brave (a multi-agency project set up to support homeless people during the Covid 19 pandemic). The council continue to look at how to support the development of move on accommodation for homeless people housed during the pandemic and are open to discussions with all potential providers who are able to invest in housing for this vulnerable group.

Proposed changes to Local Housing Strategy: As per 3.2.

¹¹ Note - The Ministry for Housing, Communities and Local Government (MHCLG) classes problematic empty properties as those that are inactive in the housing market and have been empty for more than 6 months.

3.4 Feedback: I live in a shared ownership property which has no gas supply, so relies on old redundant technology which is not fit for purpose i.e. storage heaters in rooms, immersion heater for water.

HC Response:

As this is a shared ownership property, you are the homeowner and this would be your responsibility, rather than that of the RP. We would strongly recommend that you speak to Keep Herefordshire Warm as they are able to help with the installation of central heating systems completely free to residents without central heating in their homes, thanks to funding administered by Affordable Warmth Solutions CIC from the National Grid *Warm Homes Fund*. For those that are on the gas network, we are able to refer you to support to fund gas central heating systems. There are a range of options for homes which do not have access to the gas network. Find out what is available by contacting the team on 0800 6771432.

Proposed changes to Local Housing Strategy: None, outside scope of strategy.

3.5 Feedback: The majority of homes within Herefordshire are not in dire need of improvement and are in any case within the private sector. The term 'quality of existing homes' needs qualifying to rule out most housing sectors.

HC Response:

Data indicates that there are quality issues in private rented, affordable rented and privately owned homes across Herefordshire both in terms of low EPC ratings and HHSRS category A risks as described in the strategy. The council commissioned BRE to undertake a stock modelling report in 2019. The report set out to provide the following information:

- A geographical overview of the housing conditions across Herefordshire
- Information relating to the private sector stock for Category 1 HHSRS hazards, Houses in Multiple Occupation (HMOs) and EPC ratings
- Property type and dwelling age information
- Estimates of numbers of Class 4 HMOs
- Owner-occupied sector's ability to afford necessary renovations
- A breakdown of housing indicators at Locality and Primary Care Network Area levels

The report found the following:

- 3,813 dwellings in the private rented sector have category 1 HHSRS hazards. This equates to 25% of properties in the private rented sector.
- 23.8% (17,149) of *private sector* dwellings and 20.6% (3,131) of *private rented* dwellings in Herefordshire are estimated to have an EPC rating below band E.
- 10% of social housing stock in Herefordshire had one or more category 1 hazards, the vast majority of which are related to excess cold or fall hazards

These are significant figures and the reason why we have included all sectors of the housing market in this priority.

Proposed changes to Local Housing Strategy: None, there is sufficient data to justify this approach.

3.6 Feedback: Tax the multiple owners. I know someone who owns 24 houses. What do you need 24 houses for? A maximum of 2 houses should be allowed. Why is Cornwall struggling? Because half of the place is empty most of the time!

HC Response:

It is likely that someone who owns 24 properties is running them as a business rather than for their own private use, perhaps as holiday lets or as a private sector landlord. This is a different situation from someone who owns an additional property as a second home ownership or investment. Census data tells us that there were 6904 second homes in Herefordshire in 2011. This includes holiday homes and buy to let homes. More up to date data will be available once the 2021 census data is released from June 2022 onwards.

The English Housing Survey undertaken in 2018/19 indicates that 3% of households nationally report owning a second home and that there were 772,000 second homes in the UK at that time. The survey includes information on the reasons why people own second homes, the most common reasons were as a holiday / weekend home (39%), long term investment / income (35%), previously main home (16%).

Proposed changes to Local Housing Strategy: Include information on second homes in Herefordshire.

3.7 Feedback: The old eye hospital is a prime candidate for redevelopment. Why has it been left to rack and ruin. We could have used it to house the homeless rather than spend hundreds of thousands to rehome them in bed and breakfast accommodation.

HC Response:

Herefordshire Council doesn't own the Victoria House site. It is in the hands of a private developer and has come forward for planning permission, but has been refused due to a number of objections. The building is not listed and was previously used as office accommodation so it not classed as residential to enable any enforcement around its current state.

Proposed changes to Local Housing Strategy: None, outside scope of local housing strategy.

3.8 Feedback: Maybe use empty Council properties?

HC Response:

The council has already converted some of its existing assets into housing and is currently converting two properties on Blackfriars Street into accommodation for vulnerable people. However, the council has to ensure that it makes the best use of its assets and sometimes selling properties to raise capital receipts for future investment is deemed a more viable option.

Proposed changes to Local Housing Strategy: None.

3.9 Feedback: Keep records of empty properties and use 'carrot and stick method' to encourage owners to bring them back into use asap e.g. grants to upgrade where necessary and fines if still unsold/unlet after 6-12 months / Grants should be provided to bring underused housing into main stream use.

HC Response:

As well as offering impartial advice and support for property owners, the council administer an empty property grant scheme. Grant assistance may be given in certain circumstances in line with set criteria and with conditions around the future use of the property for a set period of time. We are also able to offer a letter reducing VAT to 5% on build materials if the property has been empty for 2 years or more.

The council also have a range of enforcement powers linked to empty residential properties. For more information on this issue, please [Empty Property Strategy 2021- 2024](#).

Proposed changes to Local Housing Strategy: Ensure link to Empty Property Strategy is included in strategy.

3.10 Feedback: We would welcome consideration that developers working on planning gain sites are challenged to recognise and deliver within the areas of housing need and also the accessible homes register.

HC Response:

This is all part of the negotiation process. Developers are required to deliver accessible homes and to deliver both open market and affordable housing to meet the needs of the area. The recently published HMANA provides the evidence as a basis for negotiations. If a developer submits a plan for a development that does not meet the needs of the local area, Strategic Housing will not support the application. In 2021, it was confirmed that Herefordshire has a 6.9-year land supply, hitting the 5-year Housing Land Supply target for the first time since the Core Strategy was adopted in 2015.

Proposed changes to Local Housing Strategy: None.

3.11 Feedback: Houses are empty for a wide variety of reasons - we need to look at these reasons and address individually. For example I know of an empty house that is very poor quality and contributing to the poor health of the tenant next door but the owner had asked for planning to replace the house with a sustainable home and it was refused because the ridge of the new design was 70cm taller (to facilitate a safe staircase). They are trying to bring an empty dwelling back into occupation but were denied by policy and attitude. This is a common story - empty houses are often not fit for modern day occupation and would cost too much to upgrade, yet securing planning to replace with super eco homes is very difficult indeed.

HC Response:

Properties that have been empty for more than 6 months usually have an underlying problem. When properties have been empty for more than two years, it is likely that they will stay empty and decline without intervention. Long-term empty properties can become a hub for crime and attract vandalism and anti-social behaviour. They can become run down, fall into disrepair, have overgrown gardens and blight the surrounding properties and neighbourhood. Neighbouring owners may be dissatisfied and may find their house value has diminished or may be difficult to let or sell. Bringing long-term empty properties back into use is a priority for the strategic housing team and will contribute to increasing the supply of homes in the County.

There are restrictions on the demolition of an existing dwelling including the fact that you can only build on the same footprint. New build homes will need to meet the new homes standard from 2025 onwards so will be much more efficient than older homes. The council has recently approved a housing design guide (Herefordshire Future Homes) for all council housing with the ambition

being that all the properties we build should be net zero carbon. The expectation is that all dwellings delivered in the county should strive to meet this design guide in order to substantially improve the thermal efficiency and quality of homes going forward.

Proposed changes to Local Housing Strategy: Pass comments on to planning colleagues to feed into Core Strategy review process.

3.12 Feedback: Take control of properties unoccupied and those in need of crucial repairs. I have personally seen many vacant properties virtually in awful state, holes in roofs walls electric wires hanging!!

HC Response:

The Council follows an investigation process in order to trace owners of empty properties with a view to encouraging them to bring their properties back into use. However, it is not always possible to identify or make contact with owners, sometimes owners are reluctant or unable to bring properties back into use. Under these circumstances and if there is an imminent risk to health and safety the council will consider a number of enforcement options. The options available include but are not limited to:

- Empty Dwelling Management Order (EDMO) – Enables the council to secure occupation and responsible management of some privately owned houses and flats that have been empty for two years or more.
- Compulsory Purchase Order (CPO) – Enables the council to purchase and sell an empty property for the purpose of providing housing accommodation or facilities connected to housing accommodation
- Enforced Sale – Allows the council to force the sale of a property to recover debts owed to the council that are registered as a charge on the property.

Proposed changes to Local Housing Strategy: As per 3.9.

3.13 Feedback: Take action on the owners as there should be records of them as they should be paying council tax look towards introducing a local property tax that taxes owner of unused properties.

HC Response:

This action is already in place. The following premium increases were introduced for 'long term empty' properties in Herefordshire:

- From 1 April 2019 the 50 percent premium increases to 100 percent for vacant properties of 2 years or more
- From 1 April 2020 where a long term empty exceeds 5 years the premium increases to 200 percent
- From 1 April 2021 where a long term empty exceeds 10 years the premium increases to 300 percent

Further details are available [here](#).

Proposed changes to Local Housing Strategy: Add detail and link about council tax premiums on empty properties to strategy.

3.14 Feedback: It should be easier for individuals to convert barns, garages etc and enable additional dwellings out of buildings that are redundant from their original use - agricultural or domestic. Sympathetic designs that indicate more than a nod to the original use could be observed and enabling people to move elderly parents to be home (but still independent) seems to be a good idea but one I am repeatedly seeing denied by Herefordshire Council.

HC Response:

The Core Strategy has a specific policy for the re-use of Rural Buildings (RA 5) as follows:

The sustainable re-use of individual and groups of redundant or disused buildings, including farmsteads in rural areas, which will make a positive contribution to rural businesses and enterprise and support the local economy (including live work units) or which otherwise contributes to residential development, or is essential to the social well-being of the countryside, will be permitted where:

1. design proposals respect the character and significance of any redundant or disused building and demonstrate that it represents the most viable option for the long term conservation and enhancement of any heritage asset affected, together with its setting;
2. design proposals make adequate provision for protected and priority species and associated habitats;
3. the proposal is compatible with neighbouring uses, including any continued agricultural operations and does not cause undue environmental impacts and;
4. the buildings are of permanent and substantial construction capable of conversion without major or complete reconstruction; and
5. the building is capable of accommodating the proposed new use without the need for substantial alteration or extension, ancillary buildings, areas of hard standing or development which individually or taken together would adversely affect the character or appearance of the building or have a detrimental impact on its surroundings and landscape setting.

Any planning permissions granted pursuant to this policy will be subject to a condition removing permitted development rights for future alterations, extensions and other developments.

Proposed changes to Local Housing Strategy: Forward comments to planning colleagues.

3.15 Feedback: Explain to parishes how they can identify empty properties and notify them about properties coming back into use. A retro-fitting programme needs to be in place to combat Category 1 & 2 HHSRS hazards.

HC Response:

There is information about how to report empty properties on our [website](#). As explained in 2.4 there are some funds available for retrofitting, although we accept that not all households would be eligible for this support. The government are taking an increasing interest in upgrading the quality of new and existing homes via legislation and grant funding opportunities. They are under increasing pressure from the Environmental Audit Committee and the Climate Change Committee to commit more funding to enable the retrofitting of existing homes.

Proposed changes to Local Housing Strategy: additional context to be added to this section of the strategy.

3.16 Feedback: The objective bundles together a number of issues including the issue of housing quality, which arguably should be addressed as part of the previous objective. The strategy

highlights conditions in HMOs are a particular concern yet there is no information on the level of enforcement action taken against landlord's to improve standards. Neither is there any statement re the need to resource enforcement activity appropriately.

HC Response:

Agree that there is overlap between objectives 2 and 3. These issues will be combined into one priority.

Enforcement is undertaken in line with the councils housing enforcement policy.

Proposed changes to Local Housing Strategy: Combine objectives 2 and 3 in revised strategy.

Please detail any additional actions that could be taken to meet this objective?

- Force use of former industrial land and waste land, compulsorily purchase derelict and neglected buildings in towns and city.
- Change the government grant schemes that allow home owners to make the improvements themselves (with building regs signoff to ensure standards) rather than insisting using a registered contractor which you end up having to pay 3 times the cost to! Green schemes and grants are not value for money at all.
- Relax planning rules and build more houses. Nimbyism often means that people object to development, forgetting that the house that they live in was once a green field.
- Work with government to improve legislation to make compulsory purchase of empty properties easier.
- Lobby of better local funding for housing. Help government develop more effective green initiatives.
- Identification of such properties, and investment in existing properties which are in need of improvement, is key to raising living standards and creating healthier communities.
- Changing the rating and council tax systems to penalise unused properties and encourage private owners to sell to social developers and others. Ok, that's a national policy issue, but there must be local options that can effectively achieve the same ends?
- Make home owners aware of help available to fix up their empty properties.
- Local authority needs powers to compulsory purchase long-term empty properties.
- We must take into consideration the existing infrastructure and improve it drains, roads and health care facilities
- Keep records of empty properties and use 'carrot and stick method' to encourage owners to bring them back into use asap. E.g. grants to upgrade where necessary and fines if still unsold/unlet after 6- 12 months.
- Take control of properties unoccupied & those in need of crucial repairs. I have personally seen many vacant properties virtually in awful state, holes in roofs walls electric wires hanging!! Use these as affordable housing.
- Identifying properties that are laid abandoned or in need of a urgent facelift and creating a directory of the legislation and grants to bring long term empty properties back into use.
- Take action on the owners as there should be records of them as they should be paying council tax look towards introducing a local property tax that taxes owner of unused properties
- Vastly improve upgrades to social housing, build more, utilise existing land/buildings/ council grants
- Allow new housing to enable family clusters to develop.

- I suspect local bye laws might need to be enacted in order to compel owners to bring empty properties into use or have them compulsory purchased by the council.
- Stop the Government's threatened new planning laws announced in the Queen's speech.
- The analysis by nearly all professional and third sector bodies concerned with planning is that this will exacerbate the affordability crisis by providing a 'developer's charter' to sprawl further car-dependent market housing into the countryside, see <https://www.theguardian.com/politics/2021/may/11/johnsonspolitics-laws-an-utter-disaster-say-countryside-campaigners>.
- Training programmes for implementing energy improvements/solar and other installations in households such as heat pumps.
- Creating green efficient houses is important
- Need to raise more awareness of retirement living accommodation due to lack of demand from customers on Home Point
- With regard to long-term empty properties, there is usually a good reason why such properties remain empty and this is the matter that needs addressing. It may well be that in many cases redevelopment is the only sensible course of action.
- Remove the empty houses from the greedy landlords and give them to young locals, along with a government grant to help them renovate it with solar panels, water collection etc. Take from the rich and give to the ones who have nothing. That will level up the county a little.
- Focus on improving/providing housing within the city
- The provision of effective assistance in funding improvements.
- Grant schemes for all existing properties.
- Effective cost analysis and financial projections for each long-term empty property to weigh up cost effectiveness none.
- Grants for environmentally heating replacement Policy. Then people in the right places to make it happen without corrupt practices on the way, or 'system' delays. i.e. Efficient
- Again access to green areas
- But not at the expense of current tax payers
- It would seem to make perfect sense and esp. in the country side to convert old buildings - farm and commercial into homes. Again saves using bare land and ugly old buildings do little to enhance the env. incentivise it with tax reduction short term.
- Remove the moratorium on new development.
- The council should have the power to compulsory purchase neglected properties.
- Could the council fund or subsidise some improvement measures and match this with subsidised surveyors who would give tailored advice to householders?
- Assess whether it is more cost effective in some circumstances to demolish housing stock and start again rather than retrofit poor quality housing to try and achieve best in class insulated, warm homes.
- Grants for improvements to families on low incomes. Compulsory purchase of empty properties, improve them and sell of uses as rented at a fair rent to people who need homes and are on low incomes. .
- It should be easier for individuals to convert barns, garages etc. and enable additional dwellings out of buildings that are redundant from their original use - agricultural or domestic. Sympathetic designs that indicate more than a nod to the original use could be observed and enabling people to move elderly parents to be home (but still independent) seems to be a good idea but one I am repeatedly seeing denied by Herefordshire Council.
- I also feel that disused commercial buildings, such as offices, should be converted to flats.
- Waiting for over 20 years for a 'family' Kitchen to be re developed is ridiculous, 15 maybe to best plan.
- Incentives for landlords to make empty properties available.
- Do need to ensure the older properties can be run at low costs

- Nothing more to add.
- Keep going.
- Lobby central government for external wall insulation funding.
- Pushing the government for greater powers to ensure private landlords maintain homes to a decent standard. Pushing for compulsory purchase powers to enable long term empty or derelict homes and land to be brought back into use.
- Policies to use empty homes as temp or affordable housing and to convert empty shops to homes.
- If HMOs are a particular concern (in the quality area) what action is to be taken to improve standards?
- This needs concrete and measurable indicators for resource input, enforcement actions resolved and benefit goals. As a minimum, council tax should be collected at the maximum permissible rate on second homes and empty premises (except in verifiable cases of health/death vacancy).
- Consideration should be given to active use of compulsory purchase orders in the event of long term empty properties. Again, needs concrete and measurable indicators for resource input, enforcement actions resolved and benefit goals.
- Give details on how you will achieve this and how you will fund this. Use brownfield sites rather than approving yet more greenfield sites of large houses that are not required by local residents. Ensure affordable housing is mixed within estates and spread out.
- How this is to be dealt with needs to be very clear in the SPD so that viability challenges do not result in a reduction in the amount of affordable housing proposed.
- compulsory taking into council stock
- Ensure that properties are not allowed to stand empty and unused and offer them to local communities after a certain period, say 5 years. Introduce a home insulation programme.
- The replacement dwelling policy could be rewritten to support bringing empty homes back into occupation. Officers should take a positive approach
- Explain to parishes how they can identify empty properties and notify them about properties coming back into use. A Retro-fitting programme needs to be in place to combat Category 1 & 2 HHSRS hazards.
- Provide new houses that would be funded by developers. Resulting in less expense for the Council.
- Enforcement activity should be properly resourced and landlords forced to improve housing conditions where appropriate. More action should be considered to bring long term vacant properties back into use.
- The strategy needs to note that underused or empty town centre retail units and empty hotels/public houses, are an opportunity for development into 1 bedroom units for single people, and the retail space converted into businesses linked to the tenants or other local businesses or social enterprises. There are third sector organisations and community groups who would make valuable partners, either as property owners or development partners. The local authority could facilitate and influence this activity through enforcement or the threat of enforcement targeting delinquent or absent landowners.

Objective 4 – Reduce the negative impact that our homes have on the environment.

We asked to what extent you agreed with this priority, 142 responses were received as follows:

114 fully agreed – 80%
 22 partially agreed – 16%
 6 did not agree at all – 4%

4.1 Feedback: Homes may not represent the biggest contribution to global warming, but they do have an impact – and running a low impact home is good education for the inhabitants and the developer. More generally, new build shouldn't be as ugly, or as car-hungry as it is; encouraging people to drive is a bad thing, so filling villages with people who will have to commute isn't a great solution. And why do they have to be so visually intrusive? It is possible to design homes with low impact on the soul as well as the environment.

HC Response:

The main source of emissions from residential sectors is the use of natural gas for heating (and for cooking in the case of the residential sector). In 2020, the residential sector emitted 67.7 MtCO₂, accounting for 20.8% of all carbon dioxide emissions¹². It should be noted that emissions from these sectors do not include emissions from the generation of electricity consumed, as these emissions are included in the energy supply sector.

Proposed changes to Local Housing Strategy: Add detail re amount of carbon dioxide emitted.

4.2 Feedback: Heat pumps, solar etc. are more responsible sources of energy. Less concrete and steel means lower carbon emissions in construction.

HC Response:

Housing standards are set nationally. The Government have set out the Future Homes Standard will deliver homes that are zero-carbon ready from 2025 onwards. As part of the Future Homes Standard¹³ the government intend to:

- Set the performance standard of the Future Homes Standard at a level which means that new homes will not be built with fossil fuel heating, such as a natural gas boiler.
- Ensure homes will be future-proofed with low carbon heating and high levels of energy efficiency.
- Ensure that no further energy efficiency retrofit work will be necessary to enable them to become zero-carbon as the electricity grid continues to decarbonise.
- Existing homes will also be subject to higher standards if they are extending or undertaking a thermal upgrade.
- It is estimated that these changes will lead to a 75% to 80% carbon reduction compared with pre 2021 levels.
- Ensure that all parts of industry are ready to meet the Future Homes Standard from 2025, which will be challenging to deliver in practice, by supporting industry to take a first step towards the new standard.
- Deliver a 2021 interim uplift will deliver high-quality homes that are in line with our broader housing commitments and encourage homes that are future-proofed for the longer-term.

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/972583/2020_Provisional_emissions_statistics_report.pdf

¹³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_response_to_Future_Homes_Standard_consultation.pdf

These homes will be expected to produce 31% less CO2 emissions compared to current standards.

The scale of the challenge of retrofitting existing housing stock is the topic of a recent report from the Environmental Audit Committee. The Government's response can be found [here](#).

The Government is releasing funding opportunities to support the retrofitting of the worst performing properties (please see Q 2.4) and it is thought that a more wide spread boiler replacement scheme may be funded as part of the Governments new Heat and Buildings Strategy, although there are no details about this yet.

Herefordshire Council are currently creating a design guide for the housing that it intends to build, setting out its sustainability standards.

Proposed changes to Local Housing Strategy: Add additional detail to this section to reflect the information above.

4.3 Feedback: Garden needed, plant fruit trees in each one, offer easily accessible green energy grants to anyone without central heating.

HC Response:

Core Strategy Policy SD1 sets out criteria for sustainable design and energy efficiency as follows:

Development proposals should create safe, sustainable, well integrated environments for all members of the community. In conjunction with this, all development proposals should incorporate the following requirements:

- *ensure that proposals make efficient use of land - taking into account the local context and site characteristics;*
- *new buildings should be designed to maintain local distinctiveness through incorporating local architectural detailing and materials and respecting scale, height, proportions and massing of surrounding development, while making a positive contribution to the architectural diversity and character of the area including, where appropriate, through innovative design;*
- *safeguard residential amenity for existing and proposed residents;*
- *ensure new development does not contribute to, or suffer from, adverse impacts arising from noise, light or air contamination, land instability or cause ground water pollution;*
- *where contaminated land is present, undertake appropriate remediation where it can be demonstrated that this will be effective;*
- *ensure that distinctive features of existing buildings and their setting are safeguarded and where appropriate, restored;*
- *utilise physical sustainability measures that include, in particular, orientation of buildings, the provision of water conservation measures, storage for bicycles and waste including provision for recycling, and enabling renewable energy and energy conservation on infrastructure;*
- *where possible, on-site renewable energy generation should also be incorporated;*

Herefordshire Council are developing a sustainable design supplementary planning document which will give further guidance whilst we review the current Core Strategy.

Full funding is available to install first-time central heating systems and gas network connections for eligible households through the National Grid's *Warm Homes Fund* scheme via Keep Herefordshire Warm. Funding towards insulation and renewable energy incentives is also available; please see the [website](#) for more details.

Private renters too will benefit, as the government strengthen energy efficiency requirements for private sector landlords. To support those least able-to-pay, they will extend the Energy Company Obligation to 2026, so suppliers can help improve the draughtiest and coldest homes¹⁴.

Proposed changes to Local Housing Strategy: Signpost to policies in Housing Strategy and add information re Energy Company Obligations.

4.4. Feedback: Not building in rural villages.

HC Response: Please see response in Q1.2.

Proposed changes to Local Housing Strategy: None, already addressed.

4.5 Feedback: Eco restoration of older properties to make them more efficient.

HC Response: Please see response in Q2.4

Proposed changes to Local Housing Strategy: None, already addressed.

4.6 Feedback: As a RP we are also having to look at the way we build new properties, but also as a council they need to help us to achieve this.

HC Response: The Council has recently developed, consulted on and agreed an affordable housing supplementary planning document to give clear guidance to RP's and other developers around the development of affordable housing in Herefordshire. We have also recently developed our own Housing Design Guide (Herefordshire Future Homes) which sets out the standards to which we will work as a property developer and are keen that this is adopted as the standard to meet for all affordable homes in the county.

Proposed changes to Local Housing Strategy: None, these are planning issues.

4.7 Feedback: Many current building practices impact negatively upon the environment e.g. cramped site layout not allowing for enough green space; no work done on soil in tiny gardens - leaving rubble with a thin covering of top soil; some building materials are toxic..... Heating old houses that leak heat, produces carbon gases.

HC Response:

The council already has range of environmental, ecological and climate policies set out in the Core Strategy. There are more details about this on our website. As a county we are in carbon decline, but there is still much to be achieved in order for Herefordshire to become carbon zero by 2030. For more information on our progress to date please see the Understanding Herefordshire website.

Building standards are being improved through the Future Homes Standards as outlined in Q 4.2.

¹⁴ <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution/title>

Initiatives to address poor EPC ratings are outlined in Q 2.4, although it is accepted that more needs to be done to tackle the retrofitting challenge and that this will need additional Government investment.

Proposed changes to Local Housing Strategy: Add some additional detail re existing carbon situation in Herefordshire to the strategy.

4.8 Feedback: New homes should be built with solar panels and ground source Heating but it is wholly impractical to expect older houses to change in the short term.

HC Response:

Cleaner sources of heat are encompassed in the Future Homes Standards, which will come into full force in 2025 outlined in Q 4.2.

Improvements to older homes with a poor EPC rating can be funded by Keep Herefordshire Warm or the Green Homes Grant Local authority Delivery programme detailed in Q 2.4. Both the Climate Change Committee and the Environmental Audit Committee have advised the Government that a much greater level of investment will be needed in order to support the retrofitting of existing homes.

Proposed changes to Local Housing Strategy: None, all points already addressed above.

4.9 Feedback: Our housing in Herefordshire does not reflect our local heritage, Housing being built looks like town housing and it could be anywhere in the Country. I believe we should try to create a local housing policy that local village housing reflects village agricultural life and is built to match the older properties within the village, with local stone, wood etc. and is a design that looks more like a village house rather than the standard town housing. We are destroying our beautiful Herefordshire villages, new standard housing is being built next to 17th century cottages and black and white cottages. I believe that we need new housing and that is important, but i believe that we could, as a Council, try to set a local rule, that housing must be built to reflect it's location and to use locally sourced building materials particularly on the outside of the properties'. (I think this would be hard, but it would make our county more valuable in the end)

HC Response:

The national design guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. It was issued in 2019 and forms part of the government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

Further to this guidance, the Building Better Building Beautiful Commission issued their final report in January 2020. The report, entitled 'Living with Beauty' makes a range of recommendations to support the creation of beautiful communities.

The governments 'Planning for the Future' proposals build on this report and include a focus on the development beautiful and sustainable places. Planning for the future sets out the government's plans for housing and planning. In this document the government make a number of commitments:

- ***Revise the National Planning Policy Framework (NPPF) to embed the principles of good design and placemaking – this will make clear that high-quality buildings and***

places must be considered throughout the planning process. The framework will expand on the fundamental principles of good design to define what is expected of local authorities and developers to support the creation of beautiful places.

- **Respond to the Building Better, Building Beautiful Commission's report** – *we will look to take forward many of the Commission's recommendations, which include calling for urban tree planting and giving communities a greater opportunity to influence design standards in their area. This will put tree lined streets at the centre of future plans, so that they become the norm not the exception.*
- **Give local authorities the ability to ensure that new homes conform to local residents' ideas of beauty through the planning system** – *using the National Model Design Code we will set out clear parameters for promoting the design and style of homes and neighbourhoods local people want to see. We will ask local places to produce their own design guides and codes, informed by listening to local people and considering local context. This will embed standards in planning policy and give local communities the confidence to demand that they are met¹⁵.*

These changes, should they become legislation will impact on Herefordshire's Core Strategy review process.

In addition to the above, Herefordshire Council are currently taking part in a pilot scheme to develop new local design guide for housing development. This is a government funded initiative being piloted across 14 councils in England as follows;

- Codes will set out design principles for new development in local areas
- Local design codes will be expected to enhance the character of the local area – for example by using honey-coloured stone in the Cotswolds or red brick in the Midlands
- Selected areas will test how to give communities a real say in the layout, design and appearance of buildings in their area – helping the country Build Back Better.

Proposed changes to Local Housing Strategy: None, this is a planning issue.

4.10 Feedback: It is not enough to reduce negative impact because negative impacts have cumulative effects. It must be the objective to eliminate negative impacts altogether and even, going further, to plan for positive impacts especially for the environment. Such positive impacts need to follow the locational hierarchy so should be achieved on site as part of the development. They should not (or only as a last resort) be off-shored to sites elsewhere and we should definitely not get into trading systems for off-shoring such impacts due to the scope for fraud and manipulation attendant upon such systems.

HC Response:

Agree that objective could be reworded to say eliminate negative impacts, although this will take much longer than the lifetime of this document, it is right to be ambitious and to set out our goals in line with the councils carbon reduction and housing and building action plans. The Governments Ten Point Plan for a Green Industrial Revolution focuses on building back better, supporting green jobs, and accelerating our path to net zero including developing greener buildings. In this document the Governments sets out the following policy impacts of developing greener buildings:

- we are setting an ambition of 600,000 heat pumps installations per year by 2028

¹⁵ ;

- homes built to the Future Homes Standard will be 'zero-carbon ready' and will have 75–80% lower carbon dioxide emissions than those built to current standards
- our green home finance initiatives could help to improve the energy efficiency of around 2.8 million homes, improving around 1.5 million to EPC C standard by 2030

The full report is [here](#).

Proposed changes to Local Housing Strategy: Sign post to the above documents in the Strategy.

4.11 Feedback: We will not achieve carbon zero targets without (a) improving emissions from existing housing (b) ensuring new build materials and standards are as close to passive house standards as possible.

HC Response:

Cleaner sources of heat are encompassed in the Future Homes Standards which will come into full force in 2025 outlined in Q4.2.

Improvements to older homes with a poor EPC rating can be funded by Keep Herefordshire Warm or the Green Homes Grant Local Authority Delivery programme detailed in Q.2.4. There will need to be more investment in this area in order to have a significant impact. Both the Climate Change Committee and the Environmental Audit Committee have indicated that the government's current strategy to carbon reduction in our homes is deficient.

The government are developing a heat and building's strategy that will give clear guidance on the steps needed to decarbonise our homes, it is due to publication in 2021. There is more information about the government's current work on heat in buildings [here](#).

Proposed changes to Local Housing Strategy: Signpost to documents in Strategy.

4.12 Feedback: We are living in times where preserving biodiversity and the safety of water and soil is paramount to community health and well-being. Many parishes have completed, or are in the process of completing, parish plans..... these largely represent the views of parishioners which seem to be taken, all too often, lightly when decisions are being made at council strategic level.

HC Response:

As well as the range of environmental, ecological and climate policies set out in the Core Strategy referred to in Questions 4.3 and 2.1, the council has dedicated supplementary planning guidance on the issue of [biodiversity](#). This gives detailed guidance on how biodiversity should be considered by developers as they put their plans together.

The government is in the process of developing new environmental legislation that will cover these areas. Please see details of the Environment Bill [here](#):

Neighbourhood planning (formally known as parish plans) is a key part of the Localism Act. It gives local communities greater power to shape development by having a direct role in the development of planning policies at a local level.

Producing a Neighbourhood Development Plan gives local people the opportunity to decide the future of the places where they live and work. This will allow the community to set out the vision

for an area and the planning policies for the use and development of land, this can include choosing where you want new homes, shops, leisure facilities or employment opportunities to be built and what these buildings should look like, within your parish or Neighbourhood Area. It is important to note that plans should focus on guiding development rather than stopping it.

Within Herefordshire, neighbourhood planning can only be undertaken by town and parish councils, with Herefordshire Council providing technical support and assistance and making necessary decisions at key stages.

Once a plan is made and adopted, it will become a statutory plan carrying equal weight to the Local Plan (Core Strategy) and be part of the Local Development Framework. This will mean that it will be used in making decisions on planning applications by Herefordshire Council in your area.

The council have produced a range of guidance on how to develop a neighbourhood plan which can be found on the council [website](#). To date there are 113 designated neighbourhood areas and 81 made/adopted Neighbourhood Development Plans in Herefordshire. Full details can be found [here](#).

Proposed changes to Local Housing Strategy: None, this is a planning issue.

4.13 Feedback: For a start, the number of houses applied for needs to be enforced. Kingstone was supposed to have passive housing. The result, no passive housing and 60 more houses, poorly built on a flood plain! May I ask, how has this been allowed to happen?

HC Response:

Planning applications may be revised by developers but still need to be approved by the Local Planning Authority. Applications on sites at risk of flooding (Zoning is identified by the Environment Agency) are expected to provide information addressing any potential flood risk and this is carefully considered by the LPA. Developers are not currently required to provide passive housing and are therefore able to revise planning applications if it is not to be provided.

Proposed changes to Local Housing Strategy: None, this is a planning matter.

4.14 Feedback: The only emergency declared by this council and the UK and more broadly internationally is climate change and thus this must surely be number 1 priority in setting strategy. This must apply to existing builds undergoing work and to new ones to ensure reduced carbon output. This may cost a little more now but will as shown by CCC be cheaper in longer term. Renewables on all / high level insulation and proofed for smart grids and charging.

HC Response:

Agree to place as priority one in-amended strategy.

Please see previous responses re Future Homes Standard, increased building regulations standards from 2021 and grants for improvements to existing buildings.

Proposed changes to Local Housing Strategy: Place this as the first priority in the strategy.

4.15 Feedback: Good idea in principle but not always feasible for a homeowner to achieve as they may not have the funds to do this. I doubt the council can afford to subsidise and I would not be in favour of increasing Council charges which are already too expensive compared to other

counties. Including looking at where we are allowing new developments considering flood risks, infrastructure, traffic and destruction of natural environment.

HC Response:

The Committee on Climate Change issued a report entitled UK housing: Fit for the future? in February 2019. The aim of the report was to assess whether the UK's housing stock was adequately prepared for the challenges of climate change; both in terms of reducing emissions from UK homes and ensuring homes are adequately prepared for the impacts of climate change. The key findings of the report were that:

- the UK's legally-binding climate change targets will not be met without the near-complete elimination of greenhouse gas emissions from UK buildings.
- emissions reductions from the UK's 29 million homes have stalled, while energy use in homes – which accounts for 14% of total UK emissions – increased between 2016 and 2017.
- efforts to adapt the UK's housing stock to the impacts of the changing climate: for higher average temperatures, flooding and water scarcity, are lagging far behind what is needed to keep us safe and comfortable, even as these climate change risks grow.

The Committee's report says action is needed in the following five areas:

- **Performance and compliance.** The way new homes are built and existing homes retrofitted often falls short of stated design standards.
- **Skills gap.** The chopping and changing of UK Government policy has led to a skills gap in housing design, construction and in the installation of new technologies.
- **Retrofitting existing homes.** Ensuring existing homes are low-carbon and resilient to the changing climate is a major UK infrastructure priority, and must be supported as such by the Treasury.
- **Building new homes.** New homes should be built to be low-carbon, energy and water efficient, and climate resilient.
- **Finance and funding.** There are urgent funding gaps which must be addressed, including secure UK Government funding for low-carbon sources of heating beyond 2021, and better resources for local authorities.

They have put these challenges to the government and government has started to respond through improving the Future Homes Standard, Green Homes Grants Local Authority Delivery 2, Social Housing decarbonisation fund etc.

Funding is available for a range of solutions but tends to be focused on those who are living on low incomes and those whose houses are lowest performing in terms of EPC. This approach does leave homeowners on a medium income in a difficult position. It is anticipated that the Committee on Climate Change will continue to lobby government for funds to enable retrofitting and that as new green energy technology becomes commonly used that prices will drop and it will also become more affordable to those of us who will have to pay for it directly.

Please see previous responses re new developments.

Proposed changes to Local Housing Strategy: Signpost to documents in Strategy.

4.16 Feedback: Homes are a large part of the local environment, both visually and in the impact that building, maintaining and living in them has on the environment. All the stated objectives, such as phosphate reduction, waste management and air quality improvement are all laudable, but if the council really meant it in terms of one of these such as air quality improvement there needs to be a radical reappraisal of road transport in the city. Developments should also seek to generate a positive impact on the locality, not just seek to mitigate the known negative impacts.

HC Response:

We agree that carbon reduction is a multifaceted issue and therefore needs to be tackled across all sectors.

At a full council meeting on 2 February 2021, council determined to stop the progress of the Hereford Transport Package western bypass scheme. More information on this decision can be found on the [decision details notice 2021](#).

The decision follows a detailed review of the transport strategy for Hereford which set out to better understand existing and future transport conditions in the city, and to assess alternative options particularly in light of the declared climate and ecological emergency and changes to national transport policy.

In June 2021 the council [approved funding](#) for the progression of an eastern road link and river crossing as well as safer routes to schools and the development of a walking and cycling master plan for Hereford City.

Proposed changes to Local Housing Strategy: Include this information in the strategy.

4.17 Feedback: While recognising that the 'strategy' is chiefly concerned with improving availability of suitable homes there is little, thus far, that addresses the cost of services for occupiers of those homes. Reducing emissions is, given the Council's position on 'climate and ecological emergency', lacking substantial proposals in the 'strategy' to tackle the noted.

HC Response:

It is the councils ambition to deliver truly affordable housing in the county, this includes ensuring that the ongoing costs of running a home are also affordable to the occupant. This will be achieved by building new homes to the best possible standards and installing renewable energy technology to ensure bills are affordable in perpetuity.

Proposed changes to Local Housing Strategy: Signpost to documents in Strategy.

4.18 Feedback: This is a negatively worded assumption. Should be reworded 'Reduce the impact our homes may have on the environment' EPC is not a good indicator due to the number of listed buildings we have and the reliance on oil and LPG in the county. Confusing to mix the existing housing stock with new housing delivery. New homes in Herefordshire (not the speculative volume delivery) are actually low impact.

HC Response:

We have to make inroads in reducing our carbon output accepting that there are challenges to this and find solutions that will lead us to carbon neutrality. As a local authority we have committed to doing this by 2030, whilst the national target is 2050.

EPC is not a perfect measure for all housing as there are exceptions e.g. listed buildings. The grant schemes coming forward from the Government to reduce carbon in our homes use EPC data, so whilst we appreciate its limitations, it will continue to be a useful tool in addressing climate change and measuring the impact of interventions.

New homes do still have a carbon output, which is why the government have introduced the Future Homes Standard; these new standards will drive carbon emissions down as outlined in Q 2.3 . The council are reviewing the Core Strategy and reducing the environmental impact of development will be a key part of this process as well as infrastructure improvements to increase the take up of walking and cycling.

It is anticipated that the green technology needed to heat our homes will become more affordable as these products become the preferred option and are manufactured in bulk as our reliance on gas and oil reduces in line with government legislation and ambitions for a Green Revolution.

Proposed changes to Local Housing Strategy: Signpost to documents in Strategy.

4.19 Feedback: Nutrient pollution is coming from industrial agriculture and Welsh Water have already committed sizeable investment figures - but the strategy could look at how existing homes can reduce water use or exclude contaminants from entering the system.

Connectivity paragraph is just waffle and focused upon city and towns. More than 50% of the pop live in rural areas where there is NO public transport. However the journeys between settlements to go to shops and surgeries and schools are short and low impact. Rural areas are often judged to be non sustainable but in reality rural living is much better than city and towns in terms of connectivity - our shared facilities between settlements is often nearer and safer to access than facilities in towns and Hereford.

Planning - the main issue is the negativity that is shown towards delivery and the complexity that has crept in and taken hold. Really good, sustainable homes are being prevented.

HC Response:

The council have a nutrient management plan in place. This is actioned, monitored and updated by the nutrient management board which meets quarterly and includes membership from neighbouring local authorities, the Environment Agency, Natural England, Natural Resources Wales, NFU, Welsh Water and the Brecon Beacons National Park as well as local organisations.

There is no quick fix for the lack of public transport in rural areas, but it is acknowledged nationally as an area in of investment. In February 2020, the Prime Minister announced that bus services across the country would be transformed with simpler fares, thousands of new buses, improved routes and higher frequencies. In March 2021 the government launched its bus back better strategy which sets out the vision and opportunity to deliver better bus services for passengers across England, through ambitious and far-reaching reform of how services are planned and delivered. The rural mobility fund is part of the government's better deal for bus users. 17 English local authorities are now piloting on-demand bus services in rural or suburban areas. The outcomes of these pilots will be used to inform future provision in rural counties like Herefordshire.

Proposed changes to Local Housing Strategy: Signpost to documents in Strategy.

Please detail any additional actions that you think could be taken to meet this objective?

- Grants for energy efficiency, use of solar energy, and ensuring proper recycling.
- Plant more trees as part of any development
- Do not prevent sensible development from taking place. The correlation between house prices and supply is inescapable. We need to build more.
- Lobby for improved regulation of housing design to give properties a longer lifespan
- Incentivising sustainable approaches to house building, and the provision of grants to increase the efficiency of existing housing, is vitally important if we are to achieve environmental and ecological goals. The need for those goals are now almost universally accepted and housing is an area which can have a significant impact upon those goals.
- Encourage better design and fewer car journeys; reward high standards (e.g. passivhaus) with lower RV etc.
- Plant trees by new houses please
- More public awareness & financial help from Gov.uk.
- All new builds to be eco friendly and heat retaining
- Look to other building materials
- Build in towns and cities
- Encourage housing developers to incorporate energy saving features in their proposals. Tighten
- planning policies to ensure this happens. Ditto house owners.
- Essential that highest standards of design, selection of materials, insulation are chosen to ensure that houses last the lifetime they should, as well as to ensure that the process of building them is
- environmentally sensitive..
- We all try to help the environment but with funds impossible for many
- Use of locally sourced eco friendly materials
- Local grants/initiatives for schemes for environmental improvements on existing stock and new builds
- Legislation to force water companies to cease pollution of rivers.
- Eco roofs bigger garden as we can plant flowers hedgehog homes in gardens and solar panels etc.
- Everything detailed in strategy, with even more emphasis upon supporting new builds that aim for renewable energy and carbon neutrality and penalize those which don't do this..... even simple things like ensuring passive solar gain at the very least.
- More thought should go into developers providing solar systems etc.
- Stop polluting the rivers with new homes. Our rivers are being destroyed by sewage make this a planning requirement.
- Enable new houses to have bigger gardens - reduce housing densities.
- Waste water management, heating, and viable transport systems, need to accompany all new planning applications.
- Grants for insulation and also for converting to more efficient, less polluting means of heating. Also for conversion to photo-voltaic power.
- Encourage and support renewable energy projects in the county eg district heating/ground source heat pump for a new development. Also waste water treatment on site using integrated constructed wetlands on a smaller scale. These also add value in recreational terms and increase diversity in wildlife surroundings. Offer loans to householders for implementing individual energy generation projects.

- Insist that all new houses are built to have a net zero climate impact. Don't wait for government to update building regulations. Make a stand and upset housing developers who won't comply. Take your chance in court if they take legal action.
- I think it is essential that the efficiency of the planning department be examined and increased. Too often decisions are handed down too late and without sufficient regard for local views on the environment. There is also a huge resistance to challenging developers and their customers when environmental transgressions without agreed plans in a timely fashion to ensure preservation of hedges, green space, trees and more general environmental concerns
- Planning needs to be accountable. Solar panels compulsory, water collection compulsory, built from sustainable materials compulsory and finally holding the people who are developing the area need to be accountable. 50 houses means 50 houses! Passive houses means passive housing. If deviations are found, confiscation of the development should result and then what has been applied for should be put in its place!!
- This needs more work. We also need to look at materials used in construction, design and location as well as externals such as heat, water. Also not the Green Homes scheme has been scrapped by HMG.
- Stop new development in the countryside
- The provisioning of grants to bring about change, plus the enforcement of the 2025 requirement not to install gas fired systems.
- Stricter planning laws for all developers.
- make all new-buildings carbon neutral
- Wish central government would take a more pragmatic long term approach to this issue and simplify the grant schemes.
- Infill housing rather than greenfield sites.
- Build a ring road. Build houses along that road. Build and encourage employers to the area. Invest in education. Not bike sheds
- Make use of shared systems for heating etc. to save every house have separate heating etc.
- Green homes grant is not available already. So HC need to find measures that genuinely support the massive journey that housing stock needs to go on in the county. It is HC own declaration that said the county net zero by 2030. Its May 2021 now. There is masses to do and things can start by ensuring any new build and extensions are to help in this journey. Its simply a must. Renewables and high level insulation and transport electric ready.
- Stop phosphate run off.
- Ensure well insulated housing.
- Building regulations need to reflect environmental emergency.
- Remove the housing moratorium to enable new, energy efficient homes to be built with renewable energy sources. Maintaining the moratorium is contrary to all these objectives and will have a harmful environmental, economic and social impact.
- All new developments should prove that they have tried their best to offset their carbon footprint. This could be through the use of efficient boilers, solar panels and high quality insulation.
- All new builds of any sort to be fitted with solar panels and rainwater harvesting.
- Condition: Set building standards that deliver this.
- Quality buildings, efficient and clean heating, ventilation, access to open spaces and trees.
- Developers need to have a much stronger contractual obligation to support the community. All the developments around me are built in batches of circa 10 houses so that they don't need to address community concerns and the last development which was larger the developer then reneged on his community 106 and the council allowed it.

- All houses should have a target to reduce energy consumption and water use including metering on all houses. This could be achieved through incentives to the home owner including a reduction in council tax for those that achieve their targets?
- Extra grants to landlords
- Build in a way that means people can live in the most energy efficient way possible, with good drainage, and PLEASE NOT ON FLOOD PLAINS - this is common sense.
- Preferentially support any planning which favours the environment. In Herefordshire with an older housing stock then reduce constraints on insulation due to being a listed building
- Plant lots of trees as part of development proposals.
- Energy Efficiency: see comments made in 5c. Sustainable water management: More work needs to be done regarding farming practices within the county, not least in fertiliser application, the working and maintenance of soil and the spreading of endless amounts of chicken manure from the poultry industry. This is work that needs to be done in conjunction with government in terms of agricultural policy. Regarding homes, more use of reed bed systems for rural developments, which could then help support wildlife, would be an advantage.
- Air Quality Management: Seek to restrict car parking requirements for developments in the city and town centres so as to increase population density and/or have more green space, along with effective park and ride systems, bike lanes, footpaths etc within Hereford City. (We believe the current Air Quality Measurements referred to in the Strategy are somewhat out of date.)
- Connectivity: See comments under Air Quality Management. We believe the council's current Transport Design Guide is some 15 years old and could do with updating in light of climate change actions that are required. Planning and Environment: Produce supplementary planning guidance and design criteria/guides for certain areas. Encourage the use of designs that owe some allegiance to Herefordshire's historical buildings to help maintain the county's visual distinctiveness rather than being over-run with red boxes of the national house builders. Encourage developers to seek consultations with neighbours before submitting planning applications, and show how they have responded to those.
- In terms of measures there needs to be more consideration and prioritisation of specific measures; for example heat recovery systems may provide an opportunity to upgrade the energy efficiency of older and listed properties - and could have a substantial benefit in health (see Q5 responses) terms too. As elsewhere in the 'strategy' there is a shortage of concrete proposals and related measures of success or failure.
- Give details on how you will do this, it needs funding and actions not just a target.
- The draft strategy only discusses the energy efficiency of private housing. Whilst social housing providers must adhere to the Decent Homes Standard, which helps to ensure a certain level of energy efficiency, there are many potential benefits from Herefordshire County Council working with registered providers of social housing to support their decarbonisation plans. Social housing providers are well placed to deliver retrofit at scale. This can help to build supply chains within Herefordshire and make energy efficiency measures more accessible and affordable for the private sector. Additionally, large scale retrofit undertaken by social housing providers can help to raise awareness of energy efficiency and will likely lead to increased uptake by the private sector. This is especially relevant where communities are made up of mixed tenure properties and a social housing improvement programme could be extended to deliver the same improvements to private housing, utilising the Local Authority Delivery funding.
- Listen to local objections
- Making all homes energy-efficient is the first step to reducing their impact on the environment. Stop gas connections to all new homes. Only allow developers/builder with strong and proven environmental credentials to build new homes in the county.

- Planning must be more positive and focused upon delivery. Connectivity needs to be reassessed. The positive impact of new housing that is sustainable needs to be celebrated and learnt from. We need less hurdles and rules to jump over in order to deliver good, carbon positive homes.
- Ensuring that new house builds are of the highest quality and ensuring that existing housing is brought up to that standard. Good design to minimise environmental impact using rainwater harvesting, heat pumps, installing porous surfaces and proper active travel measures as standard through and around developments.
- Work with Great Collaboration at local level to increase chance of developing local solutions. Develop these types of properties upon my land.
- Further measures to encourage reduction in carbon emissions from existing homes and reducing fuel poverty need to be considered.
- Be ambitious and think out of the box. Not just energy conservation and generation, but water conservation, harvesting and reuse. Also consider on-site waste water solutions, such as reeds beds, which have multiple environmental benefits. Reduce the need for car use and encourage car share.

5. Work in partnership to assess and deliver solutions to identified housing need.

5.1 Feedback: Partnership with whom?

HC Response:

As a local authority, we work with a wide range of partners, both formally (via commissioning) and informally. With regards to accommodation for people in need of extra support and those who are vulnerable, we work closely with registered providers and with developers via planning gain negotiations to develop bespoke housing solutions. There is more information about this on our [website](#).

We also work with other organisations, charities and faith groups to offer support to those in need. This can be formally via commissioning or informally via multi agency working arrangements.

Proposed changes to Local Housing Strategy: Include explanation as above.

5.2 Feedback: The housing need for young people and disabled people in Herefordshire is appallingly under provided. Partnership work is needed to evaluate accurate housing need for the population not for the convenience and profit of developers.

HC Response:

The council assesses housing need via existing demand, national data and forecasting tools. This helps us to understand and plan for future. These figures are outlined in the strategy and are used to help us to establish what kind of accommodation is needed. The strategy also outlines the action that we will be taking to address demand for both adults and children and young people's services. The local housing strategy also includes details of what we are doing to make improvements. Some of these services are directly commissioned whilst others may need a bespoke solution that can be negotiated with housing developers and registered providers via the planning gain process.

Proposed changes to Local Housing Strategy: None, information already in strategy.

5.3 Feedback: As councils do not have the money to build what is required then housing associations are required to help build the houses.

HC Response:

We work directly with registered providers and housing developers via the planning gain process to meet housing need for vulnerable groups in Herefordshire as well as to ensure the development of affordable homes.

Proposed changes to Local Housing Strategy: None, information already in strategy.

5.4 Feedback: Many of our rural communities have a housing need for supporting the growing numbers of elderly residents. They often face social isolation and are unable to manage their existing accommodation.

HC Response:

Analysis in the Housing Market Area Needs Assessments shows a notable growth in the population of older persons aged 65+ in Herefordshire over the period to 2041 with the number of people expected to grow by 20,400 equal to 42% growth.

A growing older population is expected to result in the growth in the population with mobility problems by 4,800 to 2041 and with dementia by 2,170. The Council would therefore be justified through policy in requiring new homes to be delivered as 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations.

Growth in older persons, particularly in the older age groups, will also generate a need for provision of housing with support and housing with care. The assessment indicates a need for around 3,500 housing units with support (sheltered/retirement housing), particularly in the market sector; a need for around 1,400 additional housing units with care (e.g., extra-care), around 43% in the affordable sector; as well a need for additional care home bed spaces to 2041.

This data means that we can negotiate with housing developers via the planning gain process to develop housing that will meet the growing accessibility needs of our aging population, although we have already acknowledged the challenge of being able to negotiate affordable housing on smaller sites. Rural sites tend to be smaller and often under the 10 house threshold needed for affordable housing.

Proposed changes to Local Housing Strategy: None, information available in the HMANA.

5.5 Feedback: I agree to the extent that it is an effective way forward, though I don't want it to bog-down the system. I also don't want lots of council funds to be spent on housing that will eventually be outside the council ownership.

HC Response:

There is a range of approaches that the council can take to sourcing accommodation as follows:

- Work with registered providers to ensure that the accommodation that they develop meets identified need.
- Negotiate with housing developers through the planning gain process. This accommodation tends to be developed, owned and managed by registered providers.
- Refurbishment of existing council assets and purchase of stock from the open market. This is something that we have started to do over the last 2 years in order to create housing for vulnerable groups including young people and people who are homeless. The council do not currently have a housing management function so we work with other

providers via a formal commissioning process to run these properties and provide tenants with support.

- Development of council houses; this is a new and existing phase for the council. The accommodation we are seeking to develop will help us to address housing need more directly. At this point the council will either need to develop a housing management team or commission these services to ensure compliance with the Regulator of Social Housing.

Proposed changes to Local Housing Strategy: Add explanation to the strategy.

5.6 Feedback: Build houses that local people want and can afford to live in, rather than houses that make more money for developers.

HC Response:

Please see answers in section 1.

Proposed changes to Local Housing Strategy: None, information already in strategy.

5.7 Feedback: This cannot all be funded centrally but the planners MUST ensure that developers build social housing and not complain that they cannot make a profit. I do not believe it - charge more for the other houses.

Please see answers in section 1.

Proposed changes to Local Housing Strategy: None, information already in strategy.

5.9 Feedback: There is a shortage of good quality supported accommodation for older adults.

HC Response:

Herefordshire has a range of accommodation schemes for older people from new build accommodation enabling independent living in Hereford city, extra care accommodation schemes and sheltered housing schemes via Home Point. There is some more information on this topic on our [website](#).

We fully accept that this is an area of growth due to our aging population (please see information in Q 5.4) and are working with housing developers, council colleagues and registered providers to ensure a sufficient supply of suitable housing is available as demand grows.

5.10 Feedback: I think there should be Council owned homes available for people who need them although there needs to be a strategy to move people toward independence rather than assuming that a Council house is theirs for keeps as they may move from extremely vulnerable to being able to rent on the open market in which case someone else may need the home. So, some method of assessing need perhaps. There needs to be a motivating factor for people to move into the open market, rental or home buying sector. I'm not sure housing associations provide the best option if that's what you mean by partnership.

HC Response:

The housing solutions team work with vulnerable households who need housing for a wide range of reasons from homelessness through to domestic abuse. The housing solutions team work with registered providers through Home Point, as well as temporary accommodation providers and the private rental market to find the best solution for each household. Vulnerability can be down to

circumstances and people can be supported to find accommodation and employment, whilst others will need support for a much longer time. In order to help address these challenges, the council is currently developing 6 units of self-contained accommodation on Blackfriars Street in Hereford. This will be used as transitional housing (for up to 2 years), enabling us to support households to become tenancy ready and move towards greater independence.

Proposed changes to Local Housing Strategy: Include information about transitional housing and definition in glossary.

5.11 Feedback: Understanding the local housing need is key. We do not need lots of 4 and 4 bedroom houses, or lots of houses crammed in- this is about developer profit not what local people actually need or want.

HC Response:

We encourage developers to bring forward planning proposals that include a mix of housing types and tenures as outlined in Core Strategy policy H3. For sites with over 10 homes, we are able to negotiate a percentage of affordable homes. The size and tenure of these homes will be informed by the HMANA. Please see section 1 for more detail on this subject.

Proposed changes to Local Housing Strategy: None, already covered in strategy.

5.12 Feedback: The council is not in a position to deliver sufficient homes to meet housing need directly.

HC Response:

This is correct. We will still need to work with registered providers and developers to ensure that we have enough housing to meet need. We aim to develop housing that meets specific housing needs that are not being fully met by the current arrangements. We want to work alongside the current provision.

Proposed changes to Local Housing Strategy: None, already covered in strategy.

5.13 Feedback: Housing should not be developed in isolation, and past mistakes as well as an understanding of future challenges will only be avoided through a multi-agency and partner approach.

HC Response:

The planning process involves a range of consultees including environmental health, strategic housing, public rights of way, highways, water suppliers, ecology, ward councillor and the relevant parish, town or city council.

If the accommodation is being developed for vulnerable groups, the council will work with the developer or registered provider to ensure that the specification is suitable for the client group. If a service is to be commissioned by the council, we will develop a service specification and follow the procurement process.

We fully agree that the council cannot deliver the breadth of housing required and work with partners to deliver a wide range of housing in line with housing needs data.

Proposed changes to Local Housing Strategy: Include additional information about consultation and the planning process.

Please detail any additional actions that you think could be taken to meet this objective?

- Actually take notice of this consultation and publish the views given. Herefordshire has a poor record in this.
- Develop a more effective local input to national planning through lobbying our MPs
- Encourage architects to match up with non profit developers to deliver community value. Cut out the land bank owners wherever possible and look to use the profits they would otherwise take to service your own borrowings
- Work with communities and fulfil the requirement not pay lip service and let developers change their minds
- Do not use PFI as these type of schemes are very expensive over time
- Build in towns and cities with amenities
- Keep the general public up to date with progress and seek their input too.
- Likely to have more success meeting the other criteria if partnerships are with not-for-profit organisations and community groups (such as self build groups)
- population should be included with decisions not just contractors trying to boast their funds
- All new property should be designed to be as flexible ad possible (eg easily subdivided. Easily adapted. Disability aware etc.)
- Do an affordable deposit scheme in with houses or affordable mortgages
- Commercial builders need to build the types of houses needed locally not their standard boxes
- Bungalows or single storey accommodation should be a pre-requisite to planning applications
- An open bidding process and objective and publicly visible tendering / purchasing programme.
- Use the NDP process to raise awareness of Community led housing solutions to local housing need.
- Rule out swamping villages with housing above and beyond that level which is truly sustainable rather than making use unsustainable definition of the word sustainable.
- Someone independent who has no financial incentive.
- The provision of sufficient funding from Government to enable the changes necessary.
- Good consultation with those in need to make sure their requirements are met.
- Engage with over 60's, find out what they expect to need in 10 years time. Do not wait until they are 75 when it is too late.
- Needs County council policy and ways to deliver it.
- The language on this issue needs to be changed.
- Take a long term view on planning and county life, then and only then make secure decisions.
- Rebuild trust with the industries who can deliver homes - architects, builders, developers.
- If you're set on ppps then please pay for advice on making the contracts watertight with meaningful, penalties for non compliance
- Incentives to encourage provision of quality supported housing and nursing residential care - Not using poorly located land on side of busy polluted road e.g. Bargates. New build best in class.
- Promote real collaboration, occupational therapy and metal health could make practical suggestions to housing needs and solutions. It is not all about the build it is also about the people who live there and the quality of life.

- Planning mediation needs to be better with HC planning. Planners need to work with developers to ensure that developments are within the neighbourhood plans in order to show that parishioners, who the council should represent, are heard and solutions for both developers and villagers can be found.
- Understand how and where partnerships align?
- Keep NDPs to identify local desires as they have already produced plans which account for national desires and local needs
- Encourage private landlords to consider long term social rentals
- Analyse the partners which can make the best advice
- Council owned sites released specifically for these purposes. For larger sites it would be helpful if specialist housing was identified at pre-app stage, with a reduction on the affordable requirement to assist with the viability of the development proposals.
- An open mind and close working relationships.
- Could encourage the building of more homes close to town/city centre suitable for older people with mobility problems, but who then lead a fuller life by having access to their local town/city centre.
- Perhaps set targets for this provision, asking to that for affordable housing?
- The excellent response, during 2020, to the need to provide accommodation for rough sleepers shows that these issues can be tackled given appropriately joined up working between all involved parties (including the voluntary and informal contacts). As elsewhere in the strategy, there should be clear targets, and strategic means identified, to address Herefordshire's housing needs within the county - regardless of vulnerability.
- Support NDPs and ensure approvals are in line with them and not have them ignored to meet a target.
- Real 'localism'. Need action plan with teeth.