

**Summary of representations to Draft Affordable Housing SPD Consultation, 20 October – 2 December 2022**

<b>Respondent</b>	<b>Chapter /Paragraph</b>	<b>Summary of representation</b>	<b>Officer response</b>
Natural England	Introduction	Natural England has no comments to make on the Affordable Housing SPD consultation - SEA & HRA screening	Noted.
Environment Agency	Introduction	We have reviewed the SEA screening report and can confirm that we do not disagree with the conclusion reached within the report, that a SEA is not required.	Noted.
National Highways	Introduction	National Highways offers no comment.	Noted.
Anglian Water	Introduction	I can confirm that we have no comments regarding this consultation.	Noted.
Historic England	Introduction	I can confirm that while we do not have any specific comments to make at this stage, we will be interested in receiving subsequent consultations on this and related documents.	Noted.
West Bergholt Parish Council	Policy Context	Following approval at last night's full council meeting, West Bergholt Parish Council would like to inform you that it fully supports Policy DM8: Affordable Housing of the CBC Local Plan Section 2.	Noted.
Little Horkesley Parish Council	5.24 – 5.33 Rural Exception Sites	Little Horkesley Parish Council (the PC) has considered the draft SPD and puts forward the following observations; The village's settlement boundary is of a very restricted size and extent, such that developments which would deliver new housing at or above the policy threshold (or proposed policy threshold) for affordable housing provision are extremely unlikely.	An additional paragraph as proposed will be incorporated into the revised SPD.

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		<p>Therefore the only realistic potential for the provision of new affordable housing within the parish is via the 'rural exception site' route.</p> <p>For rural exception sites, the NPPF and draft SPD, clause 5.24, use the standard description of the proximity to the settlement boundary as "contiguous with" or "adjacent to". In the absence of any statutory definitions, such proximity is reserved for judgement by the Planning Authority when a proposal is submitted.</p> <p>There being a demonstrable need (via a recent RCCE Housing Needs Survey) for affordable housing in the parish, the PC requests that CBC policy and the SPD enable 'rural exception site' provision via a flexible approach to the proximity of a proposed rural exception site to the settlement boundary.</p> <p>The PC supports paragraph 5.29 of the draft SPD in its confirmation that "the proposed dwellings will remain permanently available to local people on low incomes who cannot afford market housing".</p> <p>The PC also supports the statement in paragraph 5.29 of the draft SPD which notes that a Section 106 Agreement shall be entered into "to ensure they remain permanently available to local people on low incomes".</p> <p>The PC suggests that the SPD includes text to the effect that; 'should Government policy allow or enable Colchester Borough Council to act as a proponent of an</p>	

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		affordable housing scheme on a rural exception site - in the manner identified in paragraph 5.29 of the draft SPD – then the same requirement for the affordable homes to be permanently available to local people on low incomes shall be applied.	
Jane Black	5.34 – 5.39 Vacant Building Credit	<p>The comment below is on paragraphs 5.34 to 5.39 headed Vacant building credit in the draft Affordable Housing SPD.</p> <p>The current government guidance in the PPG is to encourage the redevelopment of brown fields sites but is a rather blunt instrument. The costs of redevelopment/ conversion to housing must vary considerably.</p> <p>A conversion from office use to residential could be relatively cheap. The Council needs to adhere to national policy and guidance but this does change over time. With the change in retail patterns and a shift to home working more town/city centre premises may be converted to residential use and it is possible that the government will rethink its policy on vacant building credit. Would it be desirable to make the SPD more flexible by explaining the current vacant building credit allowance system but put in a clause that any credit allowance will be in accordance with government policy at the time a planning application is made? This would avoid possibly having to alter the SPD at a future date.</p>	<p>It is considered the SPD as currently worded aligns with the PPG, no further flexibility is required.</p> <p>Any updates to national policy will be considered when determining planning applications, as a material planning consideration as required.</p>
Andrew Radley	Affordable Housing Definition	I have one simple and obvious comment regarding affordable housing. (Affordable is a strange word to use by the way; when the average price of a house in the	Noted.

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		<p>south-east is approximately ten times the average annual wage.)</p> <p>Local authorities must build more council-owned homes for subsidised rental to those who are unfortunate or unable to pay the extortionate rents that private landlords are able to charge.</p> <p>Margaret Thatcher (Prime Minister at the time), encouraged local authorities to sell off their housing assets at knock down prices and the promise she made, to build as many homes as required to replenish the council housing stock, could never happen due to the cost. It's time for local authorities to honour Thatcher's promise... but you have no money I guess? Hey ho!</p>	