

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
General Issues				
13.1	13	Mark Prisk MP applauds the Authority's efforts in seeking to get the Local Plan in place, as soon as it is practical. Without a plan in place the district would be vulnerable to speculative and unsustainable development. There is, of course, a balance to be struck between a speedy process and proper consultation, but it's important that the adoption of a Local Plan is not delayed.	Support and comments noted and welcomed.	No amendment in response to this issue
13.2	13	No assessment has been made of empty and underused property in the district.	The Council is cognisant of paragraph 51 of the NPPF and is working with the owners of empty properties in the district. The Council has a dedicated Empty Homes Officer who is responsible for maximising the number of empty homes brought back into use in line with the Council's Empty Homes Strategy.	No amendment in response to this issue
13.3	13	Thames Water comment that the level of housing set out in the draft plan exceeds the current housing target for the district. Thames Water has been planning for a lower figure and accordingly capacity in the network will be used up at a quicker rate and delivery of any required upgrades will be required to be brought forward. The scale, nature and timing of delivery of any required infrastructure upgrades will be able to be determined once more detailed information on the scale,	Comments noted. The Council has engaged with Thames Water throughout the plan making process to ensure that the necessary wastewater infrastructure can be delivered.	No amendment in response to this issue

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		location and phasing of development is available.		
Type and Mix of Housing				
13.4	13.2	Support the thrust of Policy HOU1 which seeks to ensure the delivery of balanced communities	Support noted and welcomed.	No amendment in response to this issue
13.5	HOU1	Policy HOU1 is excessively prescriptive in that it expects all housing developments, irrespective of their location or nature, to deliver a mix of housing 'in accordance' with the latest SHMA. The policy wording should be revised so that housing developments, subject to site specific factors, deliver a mix of housing which 'reflects', 'is informed by' or 'is in line with' the latest evidence.	Agreed. The Policy wording has been amended.	Amendment to Policy HOU1, Part I: <ol style="list-style-type: none"> <li data-bbox="2050 821 2742 1220">I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence</u>.
13.6	HOU1	<p>Stevenage Borough Council supports HOU1. The plan should consider how the requirements in this policy relate to requirements in other authorities with whom housing market areas are shared.</p> <p>Stevenage, in common with many authorities in the south-east of England, experiences acute issues in relation to housing affordability and affordable housing need. As a predominantly planned New Town there are significant imbalances in the housing stock with a</p>	<p>Support and comments noted.</p> <p>It is Officer's view that a site for 600 homes should be allocated to the east of Stevenage. This site will be expected to provide an appropriate mix of housing in accordance with Policy HOU1.</p>	No amendment in response to this issue

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		<p>shortage of both small units and larger family housing.</p> <p>Stevenage Council has previously sought to deliver a proportion of larger, 'aspirational' market homes in order to diversify the town's housing offer. East Herts should consider how any potential scheme to the east of Stevenage might contribute towards this.</p>		
13.7	HOU1	<p>Mark Prisk MP comments that the majority of the rise in population stems from people living longer. This is a welcome trend, but it has implications not just for the number of homes needed, but also the type.</p> <p>It is important that any Plan which is adopted sets out how enough of the right sorts of homes are being made available, and that the policies reflect the housing and associated needs of older people and their carers.</p>	<p>Comments noted and welcomed.</p> <p>Policy HOU6 Specialist Housing for Older and Vulnerable People and Policy HOU7 Accessible and Adaptable Dwellings seek the provision of homes suitable for older and vulnerable people.</p>	No amendment in response to this issue
13.8	HOU1	<p>The SHMA is an important document, but it is not clear how often it will be updated once the plan has been adopted or indeed what may replace it in terms of government advice. There should be some recognition that housebuilders also have experience and information to bring to an assessment of appropriate mix, which is often more immediate and alert to market</p>	<p>Agreed. The Policy wording has been amended to refer to 'additional up to date evidence'.</p>	<p>Amendment to Policy HOU1, Part I:</p> <p>I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional</u></p>

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		changes than evidence in a SHMA.		<u>up-to-date evidence.</u>
13.9	HOU1	<p>(I) requires an appropriate mix of housing tenures, types and sizes to create mixed and balanced communities “<i>appropriate to local character and in accordance with the latest Strategic Housing Market Assessment.</i>”</p> <p>The principle behind the policy is not objected to but it is considered that its wording is contradictory as it implies the imposition of a mix from the SHMA which, in some circumstances may well conflict with local character. The policy should be amended to read “<i>...taking account of the latest Strategic Housing Market Assessment.</i>”</p>	Agreed. The Policy wording has been amended.	<p>Amendment to Policy HOU1, Part I:</p> <p><u>I.</u> On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence.</u></p>
13.10	HOU1	(II) requires affordable housing in accordance with Policy HOU3. The policy wording should reinforce the need to take account of viability.	Policy HOU3 Affordable Housing clearly takes account of viability. It is not considered necessary to repeat this in Policy HOU1.	No amendment in response to this issue
13.11	HOU1	The balance of housing needs to be addressed. Far too many flats are being built.	Comments noted. The latest SHMA (September 2015) shows that most of the market need is for housing (87%). The need for affordable housing is also predominantly for housing (70%).	No amendment in response to this issue
13.12	HOU1	This policy includes a requirement for at least 15% of all new dwellings to be constructed to ‘Lifetime Homes’ standards. The NPPF at paragraph 50	The Lifetime Homes Standard has been revoked through the Housing Standards Review and therefore all reference to Lifetime Homes has been deleted from the Plan. However, a requirement for	<p>Amendment to Policy HOU1, Part III:</p> <p>III. In order to encourage new homes that are readily adaptable to meet the changing needs of occupants, and to</p>

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		refers to the need for LPA's to <i>'identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand'</i> . This could include the need to provide a proportion of lifetime homes within schemes. However there is no requirement for such needs to be specifically defined within development plan policy. Such needs will inevitably change throughout the lifetime of the plan and vary throughout the district and between the market and affordable sectors. Consequently specific standards in regard to lifetime home matters should not be included within the District Plan. Instead HOU1 should refer to the Council's evidence base.	the provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime has been included in the Plan (Policy HOU7). It is considered that it is necessary for such needs to be specifically defined within policy to ensure delivery.	<p>support independent living, at least 15% of all new dwellings are expected to be constructed to 'Lifetime Homes' standards.</p> <p><u>IV. Provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime, in accordance with Policy HOU7 (Accessible and Adaptable Homes).</u></p>
13.13	HOU1	The thrust of the draft Policy is supported, however, the expectation that all residential development proposals, irrespective of their location or nature, will be delivered "in accordance" with the latest SHMA is considered to be excessively prescriptive. It is recommended that this terminology is revised so that to require residential development proposals to 'reflect', 'be informed by' or 'be in line with' the indications set out in the latest evidence base, subject to site-specific factors.	Agreed. The Policy wording has been amended.	<p>Amendment to Policy HOU1, Part I:</p> <p>I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence.</u></p>

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13.14	HOU1	The intention of the policy to secure a mix of dwelling types and tenures is supported, as is the absence of a specific dwelling mix. The content of Table 13.1 is likely to change over the plan period, such that residential developments will need to be assessed against the latest available information at the time of an application in order to inform the proposed mix of accommodation.	Comments noted and welcomed. Table 13.1 has been updated to reflect the evidence contained in the latest SHMA (September 2015). The Policy wording has also been amended to refer to 'additional up to date evidence'.	Amendment to Policy HOU1, Part I: <ol style="list-style-type: none"> <li data-bbox="2053 415 2742 814">I. On new housing developments of 5 or more gross additional dwellings, an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and in accordance with <u>taking account of</u> the latest Strategic Housing Market Assessment <u>and any additional up-to-date evidence</u>.
13.15	HOU1	Policies HOU1, HOU2 and HOU3 deal with detailed planning considerations for housing proposals including type and mix, density and affordable housing. The Council must ensure that these policies are flexible to take account of changing market conditions over time (NPPF, paragraph 50) and to ensure plans are effective and deliverable (NPPF, paragraph 182). Such flexibility is therefore required in the housing policies to ensure the delivery of housing sites taking into consideration factors such as site constraints, environmental factors, viability and other policy considerations.	<p>Comments noted and welcomed.</p> <p>Policies HOU1 and HOU3 in particular have been updated to ensure that they are flexible enough to take account of changing market conditions over time.</p> <p>Policy HOU2 has been amended to allow for a more flexible approach which takes account of the character of the surrounding area.</p>	No amendment in response to this issue
Housing Density				

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13.16	13.3.2	The use of the phrase 'may be appropriate' in the context of housing density leaves decisions up for interpretation. The Council should be clear as to what is and isn't expected.	The phrase is considered appropriate. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.	No amendment in response to this issue
13.17	HOU2	Policy should steer developers in much finer detail of provision, beyond the cross references to other policies in (a) to (d).	The policy wording is considered appropriate. Residential densities will vary dependent upon the local area context and character and the sustainability of the location.	No amendment in response to this issue
13.18	HOU2	Density is an important consideration in all developments. There must be due consideration given to the amount of green space allocated to each dwelling. The current trend for 'postage stamp' sized gardens does not accommodate children, or the need for humans to have their own green space. Sufficient garden space must be included in the density of all schemes.	Comments noted. The design and layout of development is addressed in Chapter 16: Design & Landscape (Policy DES3 Design of Development).	No amendment in response to this issue
13.19	HOU2	Support for new development being informed by the character of the local area. The policy should include a requirement for private amenity space of sufficient square metres, not small token gestures.	Support and comments noted. The design and layout of development is addressed in Chapter 16: Design & Landscape (Policy DES3 Design of Development).	No amendment in response to this issue
13.20	HOU2	The need for HOU2 is questioned. Support for the principle of making efficient use of land; however, this is an objective of the NPPF and does not need to be restated here. Other policies of the Plan give guidance on design,	Comments noted. However, the NPPF states that local planning authorities should set out their approach to housing density. Policy HOU2 does this.	No amendment in response to this issue

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		mix, open space and green infrastructure so there is no need to repeat the objectives of these policies. Moreover, the reference to average net densities (above and below 30pdh) in different locations is entirely unnecessary. Housing should be well designed taking account of local character and the resulting density will therefore vary on this basis.		
13.21	HOU2	Policy HOU2 is supported, in particular its expectation that densities of circa 30 dwellings per hectare will normally be appropriate for sites that are in peripheral locations within and on the edge of settlements.	Support noted and welcomed.	No amendment in response to this issue
13.22	HOU2	Common sense dictates that there must be a difference in housing density between urban areas and rural villages.	Comment noted. This is what Policy HOU2 seeks to achieve.	No amendment in response to this issue
13.23	HOU2	The housing densities set out in Policy HOU2 are supported	Support noted and welcomed.	No amendment in response to this issue
13.24	HOU2	Policies HOU1, HOU2 and HOU3 deal with detailed planning considerations for housing proposals including type and mix, density and affordable housing. The Council must ensure that these policies are flexible to take account of changing market conditions over time (NPPF, paragraph 50) and to ensure plans are effective and deliverable (NPPF, paragraph 182). Such flexibility is therefore required in the housing policies to ensure the delivery of	Comments noted and welcomed. Policies HOU1 and HOU3 in particular have been updated to ensure that they are flexible enough to take account of changing market conditions over time. Policy HOU2 has been amended to allow for a more flexible approach which takes account of the character of the surrounding area.	No amendment in response to this issue

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		housing sites taking into consideration factors such as site constraints, environmental factors, viability and other policy considerations.		
Affordability and the Housing Market				
13.25	13.4	The Council should ensure that the required amount of affordable housing is provided on all sites, rather than seeking a target of 'up to'.	A target of 'up to' is considered appropriate and does not diminish the Council's ability to achieve its objectives. Applicants seeking to justify a lower percentage level are required to demonstrate why it is not economically viable to provide affordable housing in accordance with the policy.	No amendment in response to this issue
13.26	13.4	The concept of affordable housing needs to be modified. It is currently associated with people reliant on the welfare state, whereas in East Herts the need for affordable housing is relevant to a much wider range of workers and families than welfare needs would address due to the high cost of renting and buying housing. The Plan should identify the need for this higher tier of 'affordable housing' and require a proportion of new housing development to meet this need.	Comment noted. The NPPF currently defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'. In addition, the Government has signalled its intention to amend the definition of affordable housing to include 'starter homes' which are new homes available to first term buyers aged under 40, at a discount of at least 20% off the open market price. Therefore, it does not necessarily mean that people who require affordable housing are reliant on the welfare state. Intermediate housing products, such as shared equity, are designed for households who are able to afford housing at a cost above that of social or affordable rent. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Policy HOU3 seeks to provide a mix of affordable housing tenures to address this need.	No amendment in response to this issue

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13.27	13.4.14	Text should acknowledge that in the case of blocks of flats, it is acceptable for dwellings accessed from a single access core to be either affordable rental units, or affordable shared ownership with or without market units, and that pepper-potting does not require these two tenure groups to be mixed on one core.	The Council works closely with Registered Providers to ensure that schemes of mixed tenure are successful. The text acknowledges that site specific considerations may prevent the 'pepper-potting' of affordable housing across a site. Further guidance on 'pepper-potting' is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document. It is the Council's intention to update this SPD shortly.	No amendment in response to this issue
13.28	13.4.14	Text should acknowledge that the distribution of affordable dwellings through a development can be in clusters.	Agreed. The text has been amended by the insertion of 'in clusters appropriate to the size and scale of the development'. Further guidance on 'pepper-potting' is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document. It is the Council's intention to update this SPD shortly.	<p>Amendment to text (para 13.4.14 renumbered 13.4.16)</p> <p><u>13.4.16</u> In general affordable housing should be provided on the application site. Wherever possible, the affordable houses should be integrated within the scheme through 'pepper-potting' rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed evenly across the entire site, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units. Further guidance on 'pepper-potting' and the Council's approach to affordable housing is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document</p> <p><u>across the entire site in clusters appropriate to the size and scale of the development</u></p>

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				(or as amended).
13.29	HOU3	<p>Stevenage Borough Council generally supports the tiered approach to affordable housing provision which takes account of viability.</p> <p>Stevenage, in common with many authorities in the south-east of England, experiences acute issues in relation to housing affordability and affordable housing need. If East Hertfordshire is minded to consider the possibility of development to the east of Stevenage, they would like to discuss the possibility of shared nomination rights to any affordable homes built there.</p>	<p>Support noted.</p> <p>Nominations to affordable homes provided in East Herts would be allocated through the East Herts Housing Register.</p>	No amendment in response to this issue
13.30	HOU3	<p>'Up to' 30% or 40% should read 'no less than'. The present wording sets 30% and 40% as maxima so that a Housing Association development of 100% affordable housing would be in breach of policy. Clearly that is not the intention. On the other hand a proposal for 10% would comply with a policy seeking a maximum of 40%, which is not the intention either. The evidence shows a very great need for affordable housing, and the policy should make it clear that at least the specified percentages are expected, unless an applicant seeks a dispensation under (IV).</p>	<p>First, the policy 'expects' a provision of 'up to' 30% or 40% according to site size. The word 'expects' would not render a scheme for over those percentages (for example made by a Housing Association) contrary to the policy, in that whilst it is not expected, it is not precluded; Second, if a viability appraisal demonstrates that 10% is the maximum provision viable in a particular scheme on a particular site at a particular time, clearly the policy is intended to allow such a provision, hence (III) and (IV) are appropriately worded.</p> <p>Disagree that the provision of affordable housing should always be rounded up if the relevant percentage results in less than .5 of a dwelling in the resultant figure. It is quite reasonable for the</p>	No amendment in response to this issue

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		To avoid any dispute when applying the various percentages to small schemes, the policy should state that the number of dwellings required to be affordable, rented, or intermediate should be rounded up to the nearest whole number.	normal convention on rounding to apply in these calculations, since otherwise the percentage provision could be over the 30% or 40% expected.	
13.31	HOU3	<p>Mark Prisk MP comments that East Herts is an expensive area to live in. The Plan's policies for enabling more affordable homes to be built are welcomed, but careful attention is needed both to the total number of affordable homes and their distribution. This means ensuring that affordable homes are developed in each town, but also in villages, especially Group One villages, where there is a need.</p> <p>The MP is also concerned to ensure that the Plan's policies seek to secure mixed developments, by tenure and by price. Single tenure developments which seek to lump lower-cost homes together, will only result in social problems later on. Mixed development should be the clear preference in the Plan's policies.</p>	<p>Comments noted and welcomed. Policy HOU3 seeks affordable housing provision on all sites proposing development of 11 or more gross additional dwellings, both in the towns and villages.</p> <p>Paragraph 13.4.16 states that affordable housing should be integrated within a scheme through 'pepper-potting', as this ensures the best prospect of securing mixed, inclusive communities.</p>	No amendment in response to this issue
13.32	HOU3	The affordable housing tenure splits proposed by HOU3 are contrary to the evidence base. The SHMA identified a need for a mix of 66% intermediate/ shared ownership and 34% social/affordable rented across all sites.	Comments noted. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Table 13.3 has been inserted into the Plan and this sets out the evidence on the affordable housing mix	<p>Amendment to Policy HOU3, Part II:</p> <p>ii. In order to continue creating mixed and balanced communities, Affordable Housing will be expected to be provided on the following tenure mix basis on</p>

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		<p>Whilst the larger site requirement is broadly in line with the need demonstrated by the evidence base, the small site balance is not.</p> <p>The justification provided is that a greater level of rented accommodation will ensure that those in greatest need will be given priority. Whilst it is acknowledged that this may provide some justification to modify the split, it is not enough to simply assume that the current requirement contained in the 2007 Local Plan is correct for the new Plan period.</p> <p>Paragraph 158 of the NPPF requires the Local Plans to be based on “adequate, <i>up-to-date and relevant evidence</i>”. Specifically in relation to housing, paragraph 159 requires local authorities to prepare a SHMA which should identify the scale, mix and range of tenures.</p>	<p>requirement.</p> <p>Notwithstanding this, the tenure split in Policy HOU3 has been removed due to the requirement for the Council to promote the delivery of starter homes. In addition paragraph 13.4.9 has been deleted.</p>	<p><u>sites proposing:</u></p> <p>(a) 5 to 199 gross additional dwellings: 75% social/affordable rented and 25% intermediate/shared ownership</p> <p>(b) 200 or more gross additional dwelling: 60% social/affordable rented and 40% intermediate/shared ownership</p> <p>II. <u>Affordable Housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The Council will negotiate the tenure mix to be provided on a site, having regard to the affordable housing products defined within the National Planning Policy Framework, through the planning application process.</u></p>

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13.33	HOU3	<p>(l) refers to a threshold of 5 or more gross additional dwellings as the trigger for provision of affordable housing.</p> <p>The Government's Autumn Statement 2013 included a commitment to consult on a proposed new 10-unit threshold for section 106 affordable housing contributions. The subsequent Planning Performance and Planning Contributions Consultation dated March 2014 sets out this policy intention. East Herts should review this threshold in light of emerging Government policy.</p>	<p>Comment noted. This has been an evolving position over recent months, with the original Written Ministerial Statement and subsequent amendment to Planning Practice Guidance being challenged through the courts.</p> <p>The position has now been clarified and the Planning Practice Guidance states that affordable housing contributions should not be sought from sites proposing development of 10 units or less. Therefore the threshold at which affordable housing will be sought has been amended in Policy HOU3.</p> <p>In addition paragraph 13.4.12 (now 13.4.4) in the supporting text has been updated.</p>	<p>Amendment to Policy HOU3, Part I (a):</p> <p>(ab) up to 305⁵% on sites proposing 5¹¹ to 14 gross additional dwellings, or between 0.17 and 0.49 hectares in size;</p> <p>Amendment to text (para 13.4.12 renumbered 13.4.4)</p> <p><u>13.4.4 In order to deliver the identified need, Policy HOU3 requires the following:</u></p> <p><u>(a) up to 35% affordable housing on sites proposing 11 to 14 gross additional dwellings;</u></p> <p><u>(b) up to 40% affordable housing on sites proposing 15 or more gross additional dwellings.</u></p>
13.34	HOU3	Most local planning authorities use net provision rather than gross to calculate thresholds.	The Policy reflects the Council's Affordable Housing & Lifetime Homes SPD which states that where a development is facilitated by the demolition of an existing dwelling or dwellings, or a building that was previously in residential use, in considering whether a development meets the threshold for providing affordable housing, the gross number of dwellings, not the net increase, will be considered.	No amendment in response to this issue
13.35	HOU3	Thorley Parish Council objects to HOU3. Social justice would seem to demand that if a number of people who have an affordable need can't live here then a similar number in the market sector	Not agreed. Planning Practice Guidance identifies that Councils should consider 'an increase in the total housing figure' where this could 'help deliver the required number of affordable homes'. It does not advocate reducing the overall housing	No amendment in response to this issue

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		should not be able to either. We suggest a reduction of between 10% and 20% of the headline figure of the total houses would be fair. Thus between 1,500 and 3,000 houses should be removed from consideration.	requirement which would result in a reduced number of affordable dwellings being delivered.	
13.36	HOU3	Buntingford Town Council, Buckland and Chipping Parish Council and others consider that the Affordable Housing percentages should be decided on a town by town, village by village, or site by site basis, based on identified local need and in areas where there is sufficient employment. Not just a quota of up to 40% across East Herts.	Not agreed. The SHMA identifies a significant need for affordable housing across the district and therefore it is important to maximise the amount of affordable housing that can be delivered through market housing led developments. Meeting affordable housing needs is a key element of the social element of sustainable development, and maximising the provision of affordable housing is identified within the Council's Corporate Strategic Plan.	No amendment in response to this issue
13.37	HOU3	The level of affordable housing proposed in policy HOU3 fails to take full account of viability and could hold back the delivery of much needed housing. Although (III) allows for a lower provision to be permitted if it can be shown that 30 or 40% cannot be delivered for viability reasons, the starting point of the policy must be a level of provision which is generally achievable across the district.	<p>The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations across the district.</p> <p>It is acknowledged that there will be certain sites where this level of affordable housing provision is not viable. Part III of Policy HOU3 allows for a lower level of affordable housing to be provided in these circumstances.</p>	No amendment in response to this issue

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13.38	HOU3	(II) requires more social rented on smaller schemes (75/25) and less on schemes over 200 dwellings (60/40). There is no justification for this difference, with a threshold of 200 units being arbitrary. The comment that affordable housing tenures on larger sites “should reflect a more balanced mix” seems unjustified; there should be a balanced mix on all sites. The Policy should be amended to state that a mix of 60/40 social rented/intermediate <i>will be encouraged</i> on all sites. This will allow flexibility and ensure an appropriate mix to be determined on a site by site basis.	<p>Comment noted. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Table 13.3 has been inserted into the Plan and this sets out the evidence on the affordable housing mix requirement. Given the demonstrable need for affordable rented housing, it is considered appropriate to continue to give priority to this tenure over intermediate housing.</p> <p>Notwithstanding this, the tenure split in Policy HOU3 has been removed due to the requirement for the Council to promote the delivery of starter homes. The size of the site will no longer affect the tenure mix sought. In addition paragraph 13.4.9 has been deleted.</p>	<p>Amendment to Policy HOU3, Part II:</p> <p>II. In order to continue creating mixed and balanced communities, Affordable Housing will be expected to be provided on the following tenure mix basis on sites proposing:</p> <p>(a) 5 to 199 gross additional dwellings: 75% social/affordable rented and 25% intermediate/shared ownership</p> <p>(b) 200 or more gross additional dwelling: 60% social/affordable rented and 40% intermediate/shared ownership</p> <p><u>II. Affordable Housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The Council will negotiate the tenure mix to be provided on a site, having regard to the affordable housing products defined within the National Planning Policy Framework, through the planning application process.</u></p>
13.39	HOU3	(VI) states that affordable housing should be “ <i>integrated into the open market housing</i> development using appropriate design methods, i.e. tenure blind.”	<p>Not agreed. The term ‘pepper-potting’ is an established term in housing policy and is considered an effective planning tool in the delivery of mixed, inclusive communities.</p> <p>However, for clarity, and acknowledging Registered</p>	<p>Amendment to text (para 13.4.14 renumbered 13.4.16)</p> <p>13.4.16 In general affordable housing should be provided on the application site.</p> <p>Wherever possible, the affordable houses</p>

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		<p>This approach is supported, however, it is noted that the supporting justification at paragraph 13.4.14 states that affordable housing should be integrated into the scheme “through pepper-potting rather than concentrated in a particular area unless site specific considerations dictate otherwise...affordable housing should be spread evenly across the entire site...”</p> <p>Objection to the use of the phrase ‘pepper potting.’ It is unrealistic to spread affordable housing ‘evenly’ as this makes proper management by Registered Providers impossible. Indeed, if, as required by the policy, the housing is tenure blind, the distribution becomes largely irrelevant.</p>	<p>Providers requirements for managing affordable housing, the text of paragraph 13.4.14 (renumbered 13.4.16) has been amended.</p> <p>Further guidance on ‘pepper-potting’ is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document. It is the Council’s intention to update this SPD shortly.</p>	<p>should be integrated within the scheme through ‘pepper-potting’ rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed <u>across the entire site in clusters appropriate to the size and scale of the development</u> evenly across the entire site, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units. Further guidance on ‘pepper-potting’ and the Council’s approach to affordable housing is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document (or as amended).</p>
13.40	HOU3	<p>Part II of the policy sets a fixed tenure split for the provision of affordable housing. The expectation that all residential development proposals, irrespective of their location or nature, will deliver such a split to be excessively prescriptive. It is recommended that the terminology is revised so that the draft Policy requires residential development proposals to ‘reflect’, ‘be informed by’ or ‘be in line with’ the indications set out in the latest evidence base, subject to site-specific factors.</p>	<p>Comment noted. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Table 13.3 has been inserted into the Plan and this sets out the evidence on the affordable housing mix requirement.</p> <p>Notwithstanding this, the tenure split in Policy HOU3 has been removed due to the requirement for the Council to promote the delivery of starter homes. The tenure split for affordable housing will be negotiated with the Council on a site by site</p>	<p>Amendment to Policy HOU3, Part II:</p> <p>II. In order to continue creating mixed and balanced communities, Affordable Housing will be expected to be provided on the following tenure mix basis on sites proposing:</p> <p>(a) 5 to 199 gross additional dwellings: 75% social/affordable rented and 25% intermediate/shared ownership</p> <p>(b) 200 or more gross additional dwelling:</p>

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			basis.	<p>60% social/affordable rented and 40% intermediate/shared ownership</p> <p><u>II.Affordable Housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The Council will negotiate the tenure mix to be provided on a site, having regard to the affordable housing products defined within the National Planning Policy Framework, through the planning application process.</u></p>
13.41	HOU3	To encourage local people to stay in the local area there needs to be far more affordable housing. There should be a second tier of "affordable housing" that provides opportunities for local people who could fund a home but not in competition with the high prices that are market driven. This might be achieved using schemes such shared ownership, co-operative housing or housing association. These houses would need to remain in a separate and not be eligible for sale into the free market. Criteria would need to be applied to encourage local people to stay in the area. This needs to be balanced with other affordable housing that will be open to all.	<p>Comment noted. The NPPF currently defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'. In addition, the Government has signalled its intention to amend the definition of affordable housing to include 'starter homes' which are new homes available to first term buyers aged under 40, at a discount of at least 20% off the open market price.</p> <p>Intermediate housing products, such as shared equity, are designed for households who are able to afford housing at a cost above that of social or affordable rent. The latest SHMA (September 2015) states that the need for rented affordable housing in East Herts is 84% and the need for intermediate affordable housing is 16%. Policy HOU3 seeks to provide a mix of affordable housing tenures to</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			<p>address this need.</p> <p>Some forms of affordable intermediate housing are subject to a local connection test, whilst others, including starter homes, are available for anyone to buy.</p> <p>In addition, most forms of shared ownership properties are designed so that the owner can staircase up to full ownership. However, Policy HOU3 requires that any subsidy will be recycled for alternative affordable housing provision.</p>	
13.42	HOU3	<p>Policy should adhere more closely to the evidence in the Viability Assessment. This will help in assisting the delivery of housing and rectifying the problems already highlighted by the Council with regards to the deliverability larger sites, and the added infrastructure costs associated with them.</p>	<p>Comment noted. The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations across the district.</p> <p>It is acknowledged that there will be certain sites where this level of affordable housing provision is not viable, and the Delivery Study confirms that policy trade-off decisions may be required between the need to deliver infrastructure to support the delivery of growth and meeting the affordable housing need. Part III of Policy HOU3 allows for a lower level of affordable housing to be provided in these circumstances.</p>	No amendment in response to this issue

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13.43	HOU3	<p>The Council is currently relying on a SHMA that was published in 2010. Given the recent change in market conditions and the volatile nature of the area, this document is out of date. The council should ensure that any update to the SHMA is in accordance with the NPPF to guarantee that the Local Plan document is seen to be robust.</p>	<p>Comment noted. An updated SHMA has been produced on behalf of the local authorities of West Essex (Epping Forest, Harlow and Uttlesford) and East Herts. The SHMA meets the requirements of the NPPF and PPG and reflects emerging good practice, including advice from the Planning Advisory Service (PAS). The 2015 SHMA replaces the SHMA Update 2012 (published in March 2013).</p>	<p>No amendment in response to this issue</p>
13.44	HOU3	<p>(l) requires on-site affordable housing provision of “up to 30% on sites proposing 5 to 14 gross additional dwellings, or between 0.17ha and 0.49ha in size” or “up to 40% on sites proposing 15 or more gross additional dwellings, or 0.5 hectares or more in size”. This is an arbitrary distinction and one that is not underpinned by the Council’s evidence base set out in the Viability Assessment 2010.</p> <p>While Criterion III states that “Lower provision may be permitted if it is demonstrated that the 30% and 40%...cannot be achieved due to viability reasons or where it would prejudice the need to secure other infrastructure priorities”, in the absence of any compelling evidence to justify the Council’s approach, it would be more appropriate to apply the same affordable housing requirement across all schemes of 5 or more dwellings as the starting</p>	<p>The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations across the district.</p> <p>Notwithstanding this, the threshold at which an affordable housing requirement will be sought from development schemes has been amended in Policy HOU3, to ensure that it is in accordance with the Planning Practice Guidance which states that affordable housing contributions should not be sought from sites proposing development of 10 units or less.</p>	<p>No amendment in response to this issue</p>

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		point for negotiation.		
13.45	HOU3	The inclusion of viability measures within the policy is supported, as it is vital that developers have sufficient <i>flexibility</i> to adapt to changing economic circumstances over the <i>plan</i> period. Policy should, however, recognise that it may not always be feasible to distribute affordable housing units amongst market housing units, as this can create difficulties in relation to the management and servicing of these units by Registered Social Landlords.	<p>Comments noted and welcomed.</p> <p>The ‘pepper-potting’ of affordable housing across a development site is considered to be crucial to the delivery of mixed, inclusive communities. However, for clarity, and acknowledging Registered Providers requirements for managing affordable housing, the text of paragraph 13.4.14 (renumbered 13.4.16) has been amended.</p> <p>Further guidance on ‘pepper-potting’ is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document. It is the Council’s intention to update this SPD shortly.</p>	<p>Amendment to text (para 13.4.14 renumbered 13.4.16)</p> <p>13.4.16 In general affordable housing should be provided on the application site. Wherever possible, the affordable houses should be integrated within the scheme through ‘pepper-potting’ rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed <u>across the entire site in clusters appropriate to the size and scale of the development</u> evenly across the entire site, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units. Further guidance on ‘pepper-potting’ and the Council’s approach to affordable housing is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document (or as amended).</p>
13.46	HOU3	The Council should ensure its affordable housing requirements are based on robust evidence, taking account of up-to-date information on viability. Based on the affordable housing needs identified by the authority’s 2013 SHMA,	Comments noted. The Delivery Study confirms the level of affordable housing that has been assessed as being viable (35% on sites proposing 5-14 dwellings; and 40% on sites proposing 15 or more dwellings) for most developments, in most locations	No amendment in response to this issue

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		an increase in the overall housing requirements for the district will be needed, given the likely delivery of affordable housing as a percentage of market-led housing developments.	across the district. The issue of addressing affordable housing need has been addressed in the SHMA as part of calculating an overall objectively assessed housing need (OAN) for the district. The updated SHMA (September 2015) sets out the district's affordable housing need, as being 31% of overall housing need. The requirements set out in Policy HOU3 aim to address this identified need.	
13.47	HOU3	It is acknowledged that the provision of affordable housing on-site as part of new residential development is preferable from the Council's perspective and it is considered to be reasonable to only allow off-site provision in exceptional circumstances. However, HOU3 might provide further explanation of the exceptional circumstances that would permit affordable housing being provided off-site, whether that be on the basis of viability, practicality or accessibility to local services and amenities etc.	Not agreed. Off-site provision of affordable housing will only be permitted in exceptional circumstances. These will be judged on a site-by-site basis and therefore it is not considered necessary to provide examples, as the circumstances of each site would be different.	No amendment in response to this issue
13.48	HOU3	HOU3 would benefit from greater clarity as to the process that will be entered into in order to calculate the financial contribution which may, where justified, be paid in lieu of on-site affordable housing. If a formula based calculation is to be used, this could be provided within the policy.	Not agreed. Off-site provision of affordable housing will only be permitted in exceptional circumstances, and it is not considered necessary to have a formula based calculation within the policy wording. Further guidance on 'off-site provision' is set out in the Council's 'Affordable Housing and Lifetime Homes' (2008) Supplementary Planning Document. It is the Council's intention to update this SPD	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			shortly.	
13.49	HOU3	It is worth emphasising that affordable housing tends to yield more children requiring school places than open market housing. That being the case, and as required by paras 70 and 72 of the NPPF, the LPA must ensure that schools are capable of being expanded to meet the demands placed on them. They should also ensure that appropriate mechanisms are in place to secure funding, and policies in place to deliver the physical expansions of the schools. This applies to both primary and secondary education.	Comment noted. The Council has worked closely with Hertfordshire County Council, as the local authority with responsibility for education, to ensure that appropriate mechanisms are in place to ensure that education needs are met either through expansion or through the provision of new schools.	No amendment in response to this issue
13.50	HOU3	Policies HOU1, HOU2 and HOU3 deal with detailed planning considerations for housing proposals including type and mix, density and affordable housing. The Council must ensure that these policies are flexible to take account of changing market conditions over time (NPPF, paragraph 50) and to ensure plans are effective and deliverable (NPPF, paragraph 182). Such flexibility is therefore required in the housing policies to ensure the delivery of housing sites taking into consideration factors such as site constraints, environmental factors, viability and other policy considerations.	Comments noted and welcomed. Policies HOU1 and HOU3 in particular have been updated to ensure that they are flexible enough to take account of changing market conditions over time.	No amendment in response to this issue

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Special Residential Uses				
13.51	13.5.1	As this section refers to mobile homes, reference should also be made to the Caravan Sites Acts regarding the detailed administration of such developments.	Not agreed. It is not considered necessary to refer to the Caravan Sites Acts.	No amendment in response to this issue
Rural Exception Sites				
13.52	13.6.4	To be financially viable some rural exception sites would need to include market housing to subsidise the provision of affordable housing.	Comment noted. In accordance with paragraph 54 of the NPPF, the text and policy has been amended to reflect the fact that allowing some market housing could facilitate the provision of additional affordable housing to meet local needs.	<p>Amendment to text (new paragraph 13.6.4)</p> <p><u>13.6.4 While the whole of a rural exception scheme is normally expected to deliver 100% affordable housing, a small number of market homes may be permitted at the Council's discretion, where a viability assessment demonstrates that a cross subsidy is necessary to make the scheme viable. Any market housing will be expected to meet identified local housing needs.</u></p> <p>Amendment to Policy HOU4, Part III:</p> <p>II. <u>A small number of market homes may be permitted, at the Council's discretion, where a viability assessment demonstrates that a cross subsidy is necessary to make the scheme viable. Any market housing provided will be expected to meet identified local housing needs.</u></p> <p>III. Where permission is granted this will be subject to planning obligations and will include safeguards that the scheme</p>

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				provides for the identified local affordable housing need and will continue to do so in perpetuity.
13.53	HOU4	Datchworth Parish Council supports the principle of policy HOU4 (III) but urge that it is made clearer that the definition of local need in perpetuity means for people with strong connections by residency or family history with the area (village or immediate surroundings) where the development is to take place and the village it is designed to benefit.	Support noted and welcomed. Further guidance on Rural Exceptions Sites, including eligibility criteria, will be set out in the updated Affordable Housing Supplementary Planning Document (SPD).	No amendment in response to this issue
Dwellings for Rural Workers				
13.54	13.7.4	Any conditions imposed should include a specific timescale, after which a review should be undertaken to determine whether the need still exists.	Comment noted. Part IV of the policy states the exceptional circumstances which would need to be demonstrated to permit the removal of an occupancy condition related to rural workers.	No amendment in response to this issue
13.55	HOU5	Part (III) should include widows, widowers and dependants of people employed in rural pursuits, as well as retirees.	Agreed. The Policy wording has been amended.	Amendment to Policy HOU5, Part III: III. Where a new dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person or persons currently employed, <u>or last employed</u> , in agriculture, forestry or other rural business, <u>or a widow or widower of such a person, and to any residents dependants</u> .
13.56	HOU5	Policy supported by Great Munden Parish Council.	Support noted and welcomed	No amendment in response to this issue
13.57	HOU5	Objection to policy in its current form	Disagree. It is considered appropriate to maintain	No amendment in response to this issue.

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		and in particular to the requirement under Part I (b). The requirement that the enterprise needs to have been established for three years to prove its financial viability and that it will remain financially viable is unnecessarily restrictive. The policy should be altered to state that provided a sound business plan is in place, which can prove the future financial viability of the site, then that is adequate enough to permit the development of permanent dwellings for rural workers.	the requirement that the enterprise needs to have been established for at least three years.	
13.58	HOU5	As written, part III of this policy omits the allowance for person(s) last employed in an agriculturally tied dwelling or their dependents from occupying. This is in conflict with the model condition set out in Circular 11/95.	Agreed. The Policy wording has been amended.	<p>Amendment to Policy HOU5, Part III:</p> <p>III. Where a new dwelling is permitted, the occupany will be restricted by condition to ensure that it is occupied by a person or persons currently employed, <u>or last employed</u>, in agriculture, forestry or other rural business, <u>or a widow or widower of such a person, and to any residents dependants</u>.</p>
Housing for Older and Vulnerable People				
13.59	HOU6	Hertfordshire County Council supports policy HOU6. Health and Community Services have advised that in East Herts there is a predicted need for an additional 49 flexicare flats by 2015; a further 97 by 2020; and an additional 149 by 2030, giving a total growth by 2030 of 295 flats. East Herts is a very	Support and comments welcomed.	No amendment in response to this issue

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		desirable place to live, and one of the local forums has advised that they have great difficulty in finding move on accommodation for those people with Learning Difficulties.		
13.60	HOU6	Hertfordshire County Council comment that at I (b) there appears to be a typographical error in the wording.	It is not clear what HCC are referring to in this instance. Further clarification has been sought and HCC has confirmed that no further action is required.	No amendment in response to this issue
13.61	HOU6	Part (l) should include a requirement for bungalows.	<p>Comment noted. However, it is considered to be too prescriptive to require through policy a specific requirement for the provision of bungalows. A new policy regarding the provision of adaptable and accessible dwellings to meet the changing needs of occupiers over their lifetimes has been included in the Plan (Policy HOU7).</p> <p>The supporting text (paragraph 13.8.4) has been amended to include reference to the provision of bungalow accommodation.</p>	<p>Amendment to text (new paragraph 13.8.4)</p> <p><u>13.8.4 The Council will require that all development schemes provide accessible and adaptable homes to meet the changing needs of occupants over their lifetime, and will encourage the provision of specialist types of retirement housing (within the C3 Use Class), such as sheltered housing and flexi-care housing, as part of the development of larger sites. Consideration should also be given to the provision of bungalows which have been identified as a preferred housing type by many older people in the District.</u></p>
13.62	HOU6	<p>HOU6 is supported, which reflects the requirement of paragraph 50 of the NPPF for local planning authorities to plan for a mix of housing that reflects the needs of different community groups, including older people.</p> <p>Proposal to allocate land at Thomas Rivers, Sawbridgeworth as retirement village with a range of accommodation</p>	<p>Support noted and welcomed.</p> <p>The issue of proposed development at the Thomas Rivers site is considered through the Sawbridgeworth Settlement Appraisal.</p>	No amendment in response to this issue

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		for the elderly.		
Gypsies and Travellers and Travelling Showpeople				
13.63	13.9	Section incomplete and will need finalising before the Plan is finalised.	This section was unable to be finalised in advance of an up to date Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment being concluded. The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 has now been finalised, which has enabled completion of the Policy.	No amendment in response to this issue
13.64	HOU7 (now HOU9)	<p>Stevenage Borough Council's Gypsy and Traveller Accommodation Assessment identifies a short term requirement for 3 pitches (to 2018) with an estimated need for an additional 3 to 5 pitches in each 5 year period thereafter. Their survey showed that all future new forming households would prefer to live in East Herts. Notwithstanding this, the Council has included these households in their figures of future need and will plan, in the first instance, on the assumption that this requirement should be met in Stevenage.</p> <p>However, the Council is mindful that they should consider non-Green Belt sites ahead of Green Belt locations. Stevenage is a tightly constrained</p>	<p>Comments noted. Duty to Co-operate discussions are ongoing between the two councils and have covered matters pertaining to traveller provision.</p> <p>However, the Stevenage Borough Local Plan 2011-2031, Publication Draft January 2016, states that it is "considered that the site allocated by Policy HO12 is sufficient to meet all permanent Gypsy and Traveller needs arising within the plan period".</p> <p>Therefore, in light of this, and the fact that the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, 2014, was unable to identify any potential new sites in locations beyond the Green Belt, at this stage it is not considered that there are any pressing Duty to Co-operate issues in respect of to be address through the District Plan.</p>	No amendment in response to this issue

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		authority with limited undeveloped land outside of the Green Belt and competing demands upon those sites that are available. Stevenage Council would therefore welcome the opportunity to discuss the matter of future Gypsy and Traveller provision under the Duty to Co-operate. In particular, whether there are any suitable non-Green Belt locations for a new site in East Hertfordshire which may be preferable in planning terms to any Green Belt locations in Stevenage for medium- to long-term provision.		
13.65	HOU7 (now HOU9)	Policy is incomplete – needs and location of pitches and lots should be identified.	Section was unable to be completed in advance of an up to date Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment being completed. The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 has now been undertaken, which has enabled completion of the Policy.	No amendment in response to this issue
13.66	HOU7 (now HOU9)	Great Munden Parish Council considers that there should be no further pitches at Field Farm, Levens Green.	Field Farm, Levens Green is an existing authorised Gypsy and Traveller site with the benefit of planning permission. It is not intended that further pitches are to be allocated at this site as part of Policy HOU9. However, should any further development proposals be submitted for the site in the future, the suitability of these would need to be considered at that time, taking into account the criteria included in Policy HOU9 and 'Planning policy for traveller sites'.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.67	HOU7 (now HOU9)	The Environment Agency support part (h) but suggest this should be expanded. In line with the Planning Practice Guidance 'highly vulnerable' development should not be located within either Flood Zones 3a or 3b. It is then only appropriate in Flood Zone 2 subject to the Exception Test. To ensure safety this point should be strengthened so that all highly vulnerable development is restricted to Flood Zone 1.	The suggested text would go beyond the guidance in 'Planning policy for traveller sites' which includes 'cover all' wording. The Environment Agency, as statutory consultee, would have the opportunity to comment on applications having floodzone implications.	No amendment in response to this issue
13.68	HOU7 (now HOU9)	Epping Forest District Council expresses concern that (a) the consultation is proceeding before a traveller accommodation needs assessment has been commissioned and (b) a five-year deliverable supply of sites has therefore not been identified. The Council is disappointed that the options of collaborative working and joint development plan provision for the travelling community have apparently not been considered.	While the section was unable to be finalised at the Preferred Options Consultation stage in advance of an up to date Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment being completed, it did provide the framework within which the identified numbers of pitches and plots would sit. The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 has now been undertaken, which has enabled completion of the Policy in the context of an up to date evidence base and in compliance with 'Planning policy for traveller sites'. Policy HOU7 now seeks to provide a five-year deliverable supply of sites and beyond to meet need throughout the Plan period. The Council has always fully acknowledged its Duty to Cooperate responsibilities and has sought to engage with all neighbouring authorities throughout the plan making process. Due to the number of surrounding neighbouring authorities and varying stages of their plan preparation, a joint development	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			<p>document is not considered appropriate at this time.</p> <p>A Memorandum of Understanding (MOU) is being prepared, which will be signed by the four local authorities that comprise the housing market area, including East Herts. The MOU will identify the way in which identified housing needs, including the needs of Gypsies and Travellers and Travelling Showpeople, will be distributed across the housing market area. In particular, it will confirm that all four local authorities are committed to meeting their respective needs within their own administrative area.</p>	
13.69	HOU7 (now HOU9)	Broxbourne Council would like to be reassured that East Herts is planning for its own gypsy and traveller and travelling showpeople needs on sites within its district boundaries.	Policy HOU9 details specific locations to meet the identified accommodation needs of Gypsies & Travellers and Travelling Showpeople over the Plan period on sites within the district boundaries.	No amendment in response to this issue
13.70	HOU7 (now HOU9)	The District Plan does not consider the need for or make any reference to providing transit pitches for Gypsies and Travellers. It is possible that there is no need to provide an additional transit site within Hertfordshire; however there may be a need for alternative transit provision, for example visitor pitches. The provision of transit accommodation to meet need generated by current and future patterns of travelling is considered a strategic issue, as defined by Paragraph 156 of the NPPF. The best way to understand and assess need for future transit provision is	The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 considered this matter, but concluded that there is not an identified need for transit provision in East Herts at this time.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		through joint studies at a County level.		
13.71	HOU7 (now HOU9)	The Draft District Plan does not consider the need for or make any reference to the current need for public pitches. There are currently 11 public sites in Hertfordshire which are managed by the County Council. There are currently 166 families on the waiting list for a pitch on a public site within the County. Meeting the need for pitches on public sites within Hertfordshire is a matter affecting more than one planning authority and as such work to understand and assess the need for future provision of public sites should be dealt with through joint working at the county level.	The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 considered this matter, but concluded that there is not an identified need for public site provision in East Herts at this time.	No amendment in response to this issue
Replacement Buildings in the Green Belt and Rural Area Beyond the Green Belt				
13.72	HOU8	This policy and supporting text would be better included in Chapter 4 Green Belt since it relates to more than just housing and hence a reader would expect to find such a policy in the Green Belt chapter rather than the Housing chapter. A note could be included in the supporting text referring the reader to Chapter 4 for policy in respect of replacement dwellings in the Green Belt and Rural Area.	Comment noted. Policy HOU8 will be deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added referring the reader to Chapter 4: Green Belt and Rural Area Beyond the Green Belt.	Amendment to Section 13.10 (renumbered as 13.12) New paragraph 13.12.3 added. <u>13.12.3 The replacement of a building in the Green Belt or the Rural Area Beyond the Green Belt will be permitted provided the new building is in the same use and is not materially larger than the one it replaces in accordance with Policy GBR1 (Green Belt) and Policy GBR2 (Rural Area Beyond the Green Belt).</u>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
				<p>Policy HOU8 deleted.</p> <p>HOU8 Replacement Buildings in the Green Belt and Rural Area Beyond the Green Belt</p> <p>Replacement buildings on a one for one basis, in the Green Belt and Rural Area Beyond the Green Belt, may be permitted provided the new building:</p> <ul style="list-style-type: none"> (a) is in the same use; (b) is not more visually intrusive or harmful to the openness of the site and its surroundings than the one it replaces; (c) is designed in accordance with Policy DES1 (Local Character and Amenity) and does not conflict with other policies in this Plan
13.73	HOU8	Local Plan Policy HSG8 includes the phrase "the volume of the new dwelling is not materially larger than the dwelling to be replaced". The District Plan cites a similar phrase in paragraph 13.10.1 Tewin Parish Council question whether this wording should also appear in the Policy HOU8?	Comment noted. Policy HOU8 to be deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added which refers to a replacement building not being materially larger than the one it replaces.	<p>New paragraph 13.12.3 added.</p> <p><u>13.12.3 The replacement of a building in the Green Belt or the Rural Area Beyond the Green Belt will be permitted provided the new building is in the same use and is not materially larger than the one it replaces in accordance with Policy GBR1 (Green Belt) and Policy GBR2 (Rural Area Beyond the Green Belt).</u></p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.74	HOU8	The NPPF sets out clearly policies for replacement dwellings in the Green Belt and, unlike PPG2 which it replaced, does not give local planning authorities discretion to set its own policy. It is not clear why the same provisions are being applied to the remainder of the rural area.	Comment noted. East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.	No amendment in response to this issue
13.75	HOU8	Policy supported as it is in compliance with the NPPF and PPG.	Support noted and welcomed. However it should be noted that Policy HOU8 has been deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added referring the reader to Chapter 4: Green Belt and Rural Area Beyond the Green Belt.	No amendment in response to this issue
13.76	HOU8	Policy supported by Great Munden Parish Council.	Support noted and welcomed. However it should be noted that Policy HOU8 has been deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (13.12.3) to be added referring the reader to Chapter 4: Green Belt and Rural Area Beyond the Green Belt.	No amendment in response to this issue
13.77	HOU8	Replacement buildings should not result in changes to the rights of way network.	Comment noted. A new section (Section 18.4) and policy (CFLR3 Public Rights of Way) has been included in Chapter 18: Community Facilities, Leisure and Recreation. This section and policy states that 'proposals for development must not adversely affect any Public Right of Way'.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
Extensions and Alterations to Dwellings and Residential Outbuildings				
13.78	HOU9	The policy is too restrictive and could be interpreted as stating that the character of the existing dwelling and surrounding area should be preserved. The policy should state that change is acceptable providing that new development is visually attractive and that appropriate innovation is supported (NPPF policy 58).	<p>Not agreed. The Policy states that the character of the existing dwelling and surrounding area should not be significantly affected to their detriment. It does not state that the character of the existing dwelling and surrounding area should be preserved, and that change would be unacceptable.</p> <p>Notwithstanding this, Policy HOU9 is to be deleted, and matters relating to the impact of extensions and alterations to dwellings on the character of the existing dwelling and surrounding area will be considered in accordance with HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p>	No amendment in response to this issue
13.79	HOU9	As reworded from the existing Local Plan, this now policy is an improvement. With regard to buildings in the Green Belt, the NPPF guidance prevails. However, it is not clear why the Policy should also be applied to the remainder of the rural area; it should be justified, qualified or deleted.	<p>Comment noted. East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p> <p>Notwithstanding this, Policy HOU9 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3</p>	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			(Design of Development).	
13.80	HOU9	It should be made clear that this policy applies over and above permitted development.	<p>Comment noted. However, all policies only apply to development proposals that require planning permission.</p> <p>It should be noted that Policy HOU9 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p>	No amendment in response to this issue
13.81	HOU9	Policy supported by Great Munden Parish Council.	<p>Support noted and welcomed.</p> <p>It should be noted that Policy HOU9 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p>	No amendment in response to this issue
13.82	HOU10 (now HOU11) (d)	The word 'original' should be deleted, so that the policy has scope for appropriate redesign of roofscapes including dormers.	Agreed. The word 'original' will be removed from the policy wording.	<p>Amendment to Policy HOU10, (d):</p> <p>(d) roof dormers may be acceptable if appropriate to the design and character of the original dwelling and its surroundings.</p>
13.83	HOU10 (now	It should be made clear that this policy applies over and above permitted	Comment noted. However, all policies only apply to development proposals that require planning	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
	HOU11)	development.	permission.	
13.84	HOU10 (now HOU11)	Policy supported by Great Munden Parish Council.	Support noted and welcomed	No amendment in response to this issue
13.85	HOU10 (now HOU11)	Policy should include wording to prevent loss of front gardens and boundary walls/landscaping as a result of redevelopment of land for the purpose of car parking.	Comment noted. However, planning permission is not required to build or replace a driveway of any size provided that permeable surfacing is used and rainwater flows to a lawn or border to drain naturally.	No amendment in response to this issue
13.86	HOU10 (now HOU11)	Policy should state that extensions should not result in the loss of rear or side amenity space.	Not agreed. An extension, by its nature, will result in the loss of some amenity space.	No amendment in response to this issue
13.87	HOU11 (now HOU12)	The Council combines policies for Green Belt and non-Green Belt locations and in each regard seems to ignore what may be achieved via domestic permitted development rights. (a) is therefore unacceptable. (b) is acceptable as a basis against which to assess proposals which require express planning approval.	<p>Comment noted. East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p> <p>Notwithstanding this, Policy HOU11 has been deleted and matters relating to residential outbuildings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).</p> <p>All policies only apply to development proposals</p>	<p>Policy HOU11 deleted</p> <p>Policy HOU11 Residential Outbuildings</p> <p>Proposals for residential outbuildings or extensions to existing outbuildings will be considered against the following criteria:</p> <p>(a) where located within the Green Belt and Rural Area Beyond the Green Belt, proposals for residential outbuildings should not result in disproportionate additions over and above the size of the original dwelling (including existing outbuildings) nor intrude into the openness of the site and the surrounding area;</p> <p>(b) be of an appropriate size, scale, mass, form, siting, design and materials of construction such that the character and appearance of the site and its surroundings, and the amenities of the current and future</p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			that require planning permission.	occupiers of the dwelling and any adjoining dwellings would not be significantly affected to their detriment.
13.88	HOU11 (now HOU12)	Policy supported by Great Munden Parish Council.	Support noted and welcomed. It should be noted that Policy HOU11 has been deleted and matters relating to extensions to dwellings will be considered in accordance with Policies GBR1 (Green Belt), GBR2 (Rural Area Beyond the Green Belt), HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages) and DES3 (Design of Development).	No amendment in response to this issue
Change of Use of Land to Residential Garden and Enclosure of Amenity Land				
13.89	HOU12	Policy is not strong enough in Green Belt areas, where the extension of a residential garden would be an encroachment into the countryside and therefore inappropriate. There should be provision for the removal of permitted development rights in the extended part of the curtilage otherwise future built development could take place within the extended garden without the need for further permission.	Comment noted. Paragraph 13.14.1 of the supporting text has been amended to explain that permitted development rights may be removed from residential garden extensions.	Amendment to paragraph 13.12.1 (now 13.14.1) The Council seeks to ensure that changes of use of land to residential garden do not result in harmful incursions into the countryside that would have an adverse effect on the character and appearance of rural landscapes. The residential use of rural land can have adverse effects on the character of the countryside from, for example, the erection of fences, garden sheds and other domestic paraphernalia. <u>Where necessary, conditions may be attached to planning permissions for residential garden extensions which remove the occupier's permitted development rights.</u>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
13.90	HOU12	Policy supported by Great Munden Parish Council.	Support noted and welcomed.	No amendment in response to this issue
13.91	HOU12	The Plan should be reinforced to state that change of use of land to residential garden and enclosure of amenity land should not result in changes to the rights of way network and that footpaths and bridleways across such land must be kept clear of obstructions.	Comment noted. A new section (Section 18.4) and policy (CFLR3 Public Rights of Way) has been included in Chapter 18: Community Facilities, Leisure and Recreation. This section and policy states that 'proposals for development must not adversely affect any Public Right of Way'.	No amendment in response to this issue
Residential Annexes				
13.92	HOU13	This policy is supported as it represents a more flexible approach than Adopted policy EN8.	Support noted and welcomed. Note Policy has been amended for clarity.	No amendment in response to this issue.

Other Proposed Amendments

Policy/Paragraph Number	Issue	Proposed Amendment
13.1.2	Paragraph updated to refer to extended Plan period	This chapter sets out the Council's approach to addressing the need for different types of housing within the District up to 2034 <u>2033</u> .
13.2.1	Paragraph rewritten to refer to NPPF and evidence base	A key aspect of creating sustainable mixed communities is maintaining a variety of housing, particularly in terms of tenure and price, and a mixture of different households such as families with children, single person households and older people. <u>The National Planning Policy Framework (NPPF) states in paragraph 47 that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Paragraph 50 states that local planning authorities should plan for a mix of housing, based on current and demographic trends, market trends and the needs of different groups in the community. It goes on to say that local planning authorities should identify the size, type, tenure and range of housing that is required in different locations.</u>

13.2.2	Paragraph updated to refer to latest evidence base	<ul style="list-style-type: none"> • The West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA) (2015); • The Older People's Housing Requirements Technical Study (2013);
13.2.3	Paragraph updated to refer to the SHMA (2015)	The SHMA Update (March 2013) identifies dwelling requirements by tenure and size mix. Based on Figure 41 in the SHMA the following tenure/size mix proportions are identified for the District Plan period. The SHMA (2015) sets out the mix of market and affordable housing need in the District by dwelling type and size over the period 2011-2033.
Table 13.1	Table updated to refer to the SHMA (2015)	See new Table 13.1 in Chapter.
Information Box	Box updated to refer to the SHMA (2015), plus other minor amendment for clarity	<p>The West Essex and East Hertfordshire Strategic Housing Market Assessment (2015) can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/shma</p> <p>The London Commuter Belt (East) Sub-Region: Older People's Housing Requirements Study (October 2013) can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/olderpeoplestudy</p> <p>The Council's latest Housing Strategy can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/housing</p>
13.2.4	<p>Reference to Lifetime Homes deleted. All local standards, including Lifetime Homes, have been replaced by a suite of national standards that cover accessibility, energy efficiency, water efficiency, security and internal space standards.</p> <p>Additional wording included on ageing population.</p>	<p>Another key issue for East Herts is its ageing population. Proposals which include an element of 'Lifetime Homes' will help to ensure enough appropriate housing is available in the future. The Lifetime Homes Standard has been developed to support the construction of flexible, adaptable and accessible homes that can respond to the changing needs of individuals and families at different stages of life at minimal cost. ONS population forecasts show that there will be 87.5% more older people (65+) by 2037. The largest increase within the 65+ group are those aged over 85, a 189.6% increase, which potentially means a significant increase in the need for support services and housing with support. It is therefore important that the District Plan takes a positive approach to planning ahead for the housing issues that will arise from the ageing population. Providing a range of house types including bungalows and accessible apartments will enable greater choice for those who need single floor accommodation.</p>

HOU1	Reference to Lifetime Homes deleted. All local standards, including Lifetime Homes, have been replaced by a suite of national standards that cover accessibility, energy efficiency, water efficiency, security and internal space standards.	III. In order to encourage new homes that are readily adaptable to meet the changing needs of occupants, and to support independent living, at least 15% of all new dwellings are expected to be constructed to 'Lifetime Homes' standards.
HOU1	Criterion number amended. Minor amendment to policy wording for clarity.	III IV. Provision of specialist housing will be encouraged for older people and vulnerable groups, across all tenures, on suitable sites in appropriate and sustainable locations in accordance with Policy HOU6 (<u>Specialist Housing for Older and Vulnerable People</u>).
HOU1	New criterion added to reflect the duties placed on the Council by the Self-Build and Custom Housebuilding Act 2015.	<u>V. Self-Build Housing in accordance with Policy HOU8 (Self-Build Housing)</u>
HOU1	Criterion number amended. Amendment to policy wording to reflect change in Policy number from HOU7 to HOU9 . Amendment to policy wording to make reference to new policy HOU10.	<u>VI.</u> Where appropriate, provision of specialist accommodation will be expected for Gypsies and Travellers and Travelling Showpeople <u>and Non-Nomadic Gypsies and Travellers and Travelling Showpeople</u> , in appropriate and sustainable locations in accordance with Policy HOU7 <u>9</u> (Gypsies and Travellers and Travelling Showpeople) <u>and Policy HOU10 (New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople)</u> .
13.3.3	Paragraph amended for clarity.	The Council will expect all housing schemes to propose densities which are sensitive to the character of the local area, and take account of on-site constraints and the <u>availability of sustainable transport options</u> level of local transport accessibility and parking . At the same time, applicants should also have regard to making efficient use of land, as this can help to reduce the amount of building on greenfield sites. Major schemes should include a range of housing density areas, to ensure varied character and appearance.
HOU2	Policy wording amended to reflect amendments to Policy Number and title from DES1 to DES3, Policy Number and title from CFLR2 to CFLR1, and Policy Number from NE3 to NE4.	I. Housing development should make efficient use of land. Proposals are required to demonstrate how the density of new development has been informed by the character of the local area and contributes to: <ul style="list-style-type: none"> (a) The design objectives set out in Policy DES4<u>3</u> (Local Character and Amenity <u>Design of Development</u>); (b) Improving the mix of house types in accordance with Policy HOU1 (Type and Mix of Housing); <u>and</u>

		<p>(c) Providing adequate levels of public open space in accordance with Policy CFLR21 (Open Space Standards <u>Open Space, Sport and Recreation</u>); and</p> <p>(d) Retaining existing site features, including mature trees, shrubs, hedgerows and amenity areas, and make provision for new green infrastructure in accordance with Policy NE34 (Green Infrastructure).</p>
HOU2	Policy amended to allow for a more flexible approach which takes account of the character of the surrounding area	<p>II. Subject to the above, densities will vary according to the relative accessibility and character of locations. Higher average net densities (30+ dph) will be favourably considered on central sites in or near town centres <u>and where the character of the surroundings allows</u>.</p> <p>III. Medium average net densities (30 dph) will normally be appropriate for sites that are in more peripheral locations within and on the edge of these settlements.</p> <p>IV. In villages and for some other locations lower average net densities (less than 30 dph) may be more appropriate to respond to local character and context.</p>
13.4.1	Paragraph amended for clarity.	The location of East Herts on the periphery of London means that the affordability of housing is a key issue <u>across the District</u> .
13.4.2	Paragraph updated to reflect the upcoming change to the definition of affordable housing to include starter homes.	<u>Affordable housing is housing provided at a cost below current market rates to eligible households, whose needs are not adequately served by the commercial housing market. For planning purposes, affordable housing has a specific definition as set by the NPPF and is currently defined as social rented, affordable rented and intermediate housing. However, the Housing and Planning Act 2016 inserts a new affordable housing definition into the Town and Country Planning Act 1990, which will, once enacted through secondary legislation, amend the definition of affordable housing to include starter homes. The NPPF currently defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'.</u>
13.4.3	Paragraph amended to update the affordable housing need to reflect the evidence from the SHMA 2015.	There is a significant need for additional affordable housing within East Herts as set out in the latest Strategic Housing Market Assessment (<u>SHMA</u>) 2015. <u>The table below sets out the current unmet need for affordable housing in the District, together with the projected future affordable need for the 22-year period 2011-2033: (SHMA).</u> Using the 'Trend Based Projections' the SHMA Update (March 2013) at Figure 39, has identified for the District Plan period, a

		<p>housing requirement tenure mix of:</p> <ul style="list-style-type: none"> • Market Housing: 51% • Intermediate Affordable Housing/Shared Ownership: 32% • Social Rented/Affordable Rented: 17%
New Table 13.2	New table inserted showing the need for affordable housing to reflect the evidence from the SHMA 2015.	<u>See Table 13.2 in Chapter.</u>
New 13.4.5	New paragraph to explain the reasoning behind amended the amended threshold at which affordable housing will be sought.	<u>Planning Practice Guidance states that affordable housing contributions should not be sought from sites proposing development of 10 units or less and where the dwellings would have a combined gross internal floor space of 1,000 square metres or less. Therefore, the affordable housing requirement has not been set at 31% in recognition of the fact that not all developments will contribute to the provision of affordable housing.</u>
New 13.4.6	New paragraph to reflect the updated viability evidence contained in the Delivery Study.	<u>The percentage of affordable housing provision that the Council will expect to secure from development schemes has been informed by development viability assessments. The aim is to maximise affordable housing provision and the viability assessments demonstrate that the targets of 35% and 40% as required in Policy HOU3, are viable for most developments in most locations across the District, and can be realistically achieved without constraining the overall delivery of housing.</u>
Information Box	Box updated to refer to the Delivery Study	The East Herts Viability Assessment (2012) can be viewed and downloaded from the Council's website at: www.eastherts.gov.uk/viabilitystudy <u>The Delivery Study can be viewed and downloaded at: www.eastherts.gov.uk/deliverystudy</u>
13.4.4	Paragraph deleted as evidence is out of date.	The SHMA has, therefore, identified a total affordable housing requirement of 49% of all housing provision. In terms of the affordable housing element, it shows a tenure mix of 66% intermediate/shared ownership and 34% social/affordable rented. This finding, which is projected over the plan period, is different to that which the Council currently seeks of 75% social/affordable rented and 25% intermediate/shared ownership.
13.4.5	Paragraph deleted as information is out of date.	Since the SHMA was updated, a number of the affordable housing products have either been refined or are not being developed by Registered Providers (housing associations) in East Herts. The intermediate affordable products being developed by Registered Providers, have been reduced down to one, which is shared ownership and is offered to any resident that qualifies and

		can afford to purchase. The previous intermediate rent product, that was set at 80% of market rent and offered on an assured short hold tenancy, is no longer being developed and has become part of the affordable rent products, let through the Council's Housing Register, on either lifetime or fixed term tenancies and is, therefore, comparable to social rent. There are currently no new properties being developed that are specifically for key workers or offered on an intermediate rent outside the Council's Housing Register.
New 13.4.7	New paragraph to show the mix of affordable housing required to reflect the evidence from the SHMA 2015.	<u>Table 13.3 sets out the housing mix requirements in terms of property type (house or flat), size and affordable housing tenure.</u>
New Table 13.3	New table inserted showing the mix of affordable housing required to reflect the evidence from the SHMA 2015.	<u>See Table 13.3 in Chapter.</u>
New 13.4.9	New paragraph to explain the national policy context on starter homes with regard to the tenure mix required from affordable housing.	<u>Effective affordable housing provision is not just about quantity; of equal importance is ensuring the right type of provision. The SHMA 2015 identifies the greatest need for affordable housing is from those requiring housing from the affordable rent tenure. However, the Housing and Planning Act 2016 has introduced the requirement for local authorities to promote the supply of starter homes. The Act sets out a definition of starter homes and signals the Government's intention to require a set proportion of starter homes to be delivered on qualifying sites, the level of which will be confirmed by secondary legislation.</u>
New 13.4.10	New paragraph to explain the national policy context on starter homes with regard to the tenure mix required from affordable housing.	<u>The Government's 'Starter Homes Technical Regulations' consultation indicates the intention for starter homes to apply to sites proposing 10 dwellings or more (or over 0.5ha in size) and for a minimum level of provision of 20% to apply. The consultation also suggests that in cases where an adopted affordable housing policy seeks a requirement for affordable housing in excess of 20%, only in circumstances where the 20% starter homes requirement is firstly met can any remaining proportion of other affordable housing tenures be sought.</u>
13.4.7	Paragraph deleted as evidence is out of date.	The Council recognises that the level of affordable housing provision set out in Policy HOU3 is less than the 49% indicated in the SHMA, and that as a consequence is insufficient to meet local need. Policy HOU3 sets out the percentage of affordable housing that the Council will expect to secure. This has been informed by development viability assessments. The aim is to maximise affordable housing provision and the viability assessments demonstrate that the targets of 30% and 40% as required in Policy HOU3, are

		viable for most developments in most locations across the district, and can realistically be achieved without constraining overall delivery of housing.
13.4.8	Paragraph deleted and some of the wording reflected in new paragraph 13.4.11.	Due to the continuing demonstrable pressing need for social and affordable rented housing, priority will be given to this tenure over intermediate/shared ownership. In this way those in most need of affordable housing continue to be given priority. There is also a case that in order to continue creating mixed and balanced communities, affordable housing tenures on larger sites should reflect a more balanced mix.
13.4.9	Paragraph deleted as evidence is out of date.	Policy HOU3, therefore, sets out that on: <ul style="list-style-type: none"> Small to medium sized sites, proposing between 5 and 199 dwellings, the affordable housing will be expected to be provided with a tenure mix of 75% social/affordable rented and 25% intermediate/shared ownership. Large sites proposing 200 and more dwellings, the affordable housing will be expected to be provided with a tenure mix of 60% social/affordable rented and 40% intermediate/shared ownership.
New 13.4.11	New paragraph to set out the tenure mix that will be sought from affordable housing.	<u>Policy HOU3, therefore, has to have regard to the provision of starter homes. As such, the policy sets out that affordable housing provision will be expected to incorporate a mix of tenures taking account of the Council's most up to date evidence on housing need. The tenure mix will be negotiated by the Council on a site by site basis, having regard to the affordable housing products defined within the National Planning Policy Framework. However, due to the continuing demonstrable need for affordable rented housing, as evidenced in the SHMA, the Council will seek to maximise provision of this tenure to ensure that the needs of those in most need of affordable housing are met.</u>
13.4.12	Paragraph deleted as the threshold at which affordable housing will be sought has been amended.	Policy HOU3 states that the Council will seek affordable housing on developments of 5 or more dwellings, or the related site size. It is considered that this is a realistic threshold, which enables the delivery of affordable housing and does not prevent the delivery of smaller housing sites within the District.
13.4.14	Paragraph split into 3 new paragraphs for clarity (13.4.15, 13.4.16 and 13.4.17). Amendments made to paragraph wording for clarity.	13.4.14 ¹⁵ In general affordable housing should be provided on the application site. <u>Off-site provision or financial contributions in lieu will only be accepted in exceptional circumstances where agreed with the Council. Applicants proposing off-site provision or financial contributions in lieu will be expected to provide</u>

		<p><u>justification as part of a planning application.</u></p> <p><u>13.4.16</u> Wherever possible, the affordable houses should be integrated within the scheme through ‘pepper-potting’ rather than concentrated in a particular area unless site specific considerations dictate otherwise. This does not necessarily mean that every second or third property should be affordable; rather the affordable housing should be distributed <u>across the entire site in clusters appropriate to the size and scale of the development evenly across the entire site</u>, as this ensures the best prospect of securing mixed, inclusive communities. The design and appearance of affordable housing should be indistinguishable from market units.</p> <p><u>13.4.17</u> Further guidance on ‘pepper-potting’ and the Council’s approach to affordable housing <u>and the implementation of this policy will be provided in an updated ‘Affordable Housing’ Supplementary Planning Document.</u> is set out in the Council’s ‘Affordable Housing and Lifetime Homes’ (2008) Supplementary Planning Document (or as amended).</p>
13.4.15	Paragraph deleted and wording added to new paragraph 13.4.15.	In general affordable housing should be provided on the application site. <u>Off-site provision or financial contributions in lieu will only be accepted in exceptional circumstances where agreed with the Council. Applicants proposing off-site provision or financial contributions in lieu will be expected to provide justification as part of a planning application.</u>
HOU3 – Part I.	Policy wording amended for clarity.	I. <u>Affordable housing provision will be expected on all development sites that propose development that falls within Class C3 (Dwelling Houses) as follows:</u> Affordable Housing provision will be expected with all Class C3 (Dwelling House) developments as follows:
HOU3 – Part I.	New criterion (a) added to policy to reflect the thresholds for seeking affordable housing provision set out in Planning Practice Guidance.	<u>(a) up to 35% on sites proposing 10 or fewer gross additional dwellings, and where the dwellings would have a combined gross floor space greater than 1,000 square metres;</u>
HOU3 – Part I.	Amendment to criterion (a) (now criterion (b)) to remove the site size threshold. The site size thresholds are no longer considered to be necessary to ensure the provision of affordable housing as a	<u>(b) up to 305% on sites proposing 511 to 14 gross additional dwellings, or between 0.17 and 0.49 hectares in size;</u>

	floorspace threshold has been included within national policy.	
HOU3 – Part I.	Amendment to criterion (b) (now criterion (c)) to remove the site size threshold. The site size thresholds are no longer considered to be necessary to ensure the provision of affordable housing as a floorspace threshold has been included within national policy.	(a) up to 40% on site proposing 15 or more gross additional dwellings, or 0.5 hectares in size.
HOU3 – Part III.	Policy wording amended to reflect change in Part I. of policy.	III. Lower provision may be permitted if it is demonstrated that the 30 5 % and 40%, as appropriate referred to in I (a), and (b) <u>and (c)</u> above, cannot be achieved due to viability reasons or where it would prejudice the need to secure other infrastructure priorities. <u>Applicants seeking to justify a lower percentage level of affordable housing to that referred to in I (a), (b) and (c) above, will be required to provide a financial viability assessment as part of the planning application. Where agreement is not reached, external independent consultants, agreed by both the Council and applicant, will be appointed by the developer, to undertake further independent viability assessment. The applicant will be required to meet the costs of this independent assessment.</u>
HOU3 – Part IV.	Part IV. of policy deleted and majority of wording added to Part III. Reference to tenure mix deleted to reflect change to Part II. of policy HOU3.	IV. Applicants seeking to justify a lower percentage level of affordable housing and/or different tenure mix, to that referred to in I (a) and (b) and II (a) and (b) above, will be required to provide a financial viability assessment as part of the planning application. Where agreement is not reached, external independent consultants, agreed by both the Council and applicant, will be appointed by the developer, to undertake further independent viability assessment. The applicant will be required to meet the costs of this independent assessment.
HOU3 – Part VI. (now Part V.)	Policy wording amended for clarity and to reflect change to paragraph 13.4.14 (now paragraph 13.4.18).	VI. The affordable housing units should be integrated into the open market housing development using appropriate design methods, i.e. tenure blind, <u>and 'pepper-potted' across the site in clusters appropriate to the size and scale of the development.</u>
HOU3 – Part VII. (now Part VI.)	Policy wording amended for clarity and to reflect the change in definition of affordable housing to include starter homes.	VII. To secure the benefits of affordable housing for first and subsequent occupiers, such affordable housing <u>affordable rented and intermediate housing</u> will be retained as affordable by means of an appropriate legal agreement <u>or condition</u> with the Council, or the subsidy will be recycled for alternative affordable housing provision.

New 13.6.6	New paragraph to reflect the approach to be taken to the provision of starter homes on rural exception sites.	<u>Rural exception sites are not required to provide starter homes and the Council will not accept starter homes as part of the affordable housing provision on site. Consideration will however be given to the inclusion of starter homes as part of the market housing share allowed by the policy where necessary to ensure the viability of the scheme.</u>
HOU5	Policy amended for clarity.	IV. Applications for the removal of an occupancy condition related to rural workers will only be permitted in exceptional circumstances where it can be demonstrated that: (a) There is no longer a need for the accommodation <u>for agricultural, forestry or other rural workers</u> on the holding/business and in the local area;
13.8.1	Paragraph wording amended for clarity.	National policy requires local authorities to meet the specific accommodation needs of older and vulnerable people. It is important that the Council, working with partners such as the County Council, Registered Providers, health care agencies, and developers, seeks to plan for increasing housing choices in terms of specialist accommodation <u>for older and vulnerable people</u> , and appropriate dwellings that are in locations close to sustainable transport options and other key local services. In addition, o Offering attractive alternative housing choices for older people and vulnerable groups will assist in freeing-up family sized homes that are currently under-occupied.
13.8.2	Paragraph wording amended for clarity.	There is, therefore, a need in the District to provide suitable accommodation for various groups of people, including the elderly, people with disabilities and vulnerable people. <u>This covers a range of housing types, from accessible and adaptable general needs housing to the full range of retirement and specialised housing for those with support or care needs.</u>
13.8.3	Paragraph wording amended to reflect Government guidance and to provide clarity.	<u>The Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home as long as possible. Therefore,</u> A accommodation for the elderly is moving towards more flexible forms of living and support, which seek to maintain their <u>people's</u> independence. There are several options where residents can enjoy their own self-contained home within a site offering extra facilities. These include retirement homes, and 'extra care' housing, where varying levels of care and support are provided within the home. Other forms of accommodation include residential care or nursing homes.

New 13.8.4	New paragraph setting out the Council's approach to the provision of housing suitable for older and vulnerable people within the C3 Use Class.	<u>The Council will require that all development schemes provide accessible and adaptable homes to meet the changing needs of occupants over their lifetime, and will encourage the provision of specialist types of retirement housing (within the C3 Use Class), such as sheltered housing and flexi-care housing, as part of the development of larger sites. Consideration should also be given to the provision of bungalows which have been identified as a preferred housing type by many older people in the District.</u>
New 13.8.5	New paragraph setting out the evidence for specialist residential or nursing care accommodation within the C2 Use Class, as identified in the latest SHMA (2015).	<u>People who are unable to live independently require specialist residential or nursing care accommodation. This type of accommodation usually falls within the C2 Use Class. It is important to note that the objectively assessed housing need (OAN) for the District does not include the projected increase of the institutional population. The SHMA (2015) identifies the projected growth in population aged 75 or over living in communal establishments in the District, as 529 persons, between 2011-2033.</u>
New 13.8.6	New paragraph setting out the requirement for specialist residential or nursing care accommodation within the C2 Use Class, as identified in the latest SHMA (2015).	<u>Therefore, in addition to the overall housing target, this Plan supports a gross increase of at least 530 bed-spaces of C2 provision, primarily to help meet the accommodation needs of older people who need to live in an environment which provides residential or nursing care. However, other people including young people, people with physical disabilities or sensory needs, people with learning difficulties and other vulnerable people may also require specialist accommodation.</u>
13.8.4 (now 13.8.7)	Paragraph amended for clarity.	<u>Specialist types of retirement housing and specialist residential and nursing care accommodation</u> Residential care accommodation should normally be located within settlements where there is easy access to a range of services e.g. shops, healthcare facilities, and social facilities, <u>and sustainable transport options.</u>
New 13.8.8	New paragraph justifying the Council's decision to incorporate the optional 'Building Regulations' standards relating to accessible and adaptable dwellings into planning policy.	<u>As people's housing needs change over their lifetimes, it is important to promote the construction of flexible, adaptable and accessible homes that can respond to the changing needs of individuals and families at different stages of life at minimal cost. Therefore, it makes practical, social and economic sense to incorporate accessible and adaptable design features from the outset, at the start of a building's life, to help people remain independent in their own homes and enjoy a good quality of life.</u>
New 13.8.9	New paragraph setting out the Government guidance on the new 'optional' Building Regulations standards.	<u>In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings (Requirement M4(2) (accessible and adaptable dwellings) and M4(3) (wheelchair user dwellings). These optional requirements can only be secured through planning policy, and Planning Practice Guidance states that local authorities should identify the proportion of</u>

		<u> dwellings in new developments that should comply with the requirement in their Local Plan.</u>
New 13.8.10	New paragraph setting out the requirement for the provision of dwellings that meet the Category 2 and Category 3 requirements as set out in Building Regulations, as identified in the latest SHMA (2015).	<u>The SHMA (2015) identifies that evidence supports the need for all new dwellings to meet Category 2 requirements (accessible and adaptable dwellings), and the need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements (wheelchair user dwellings), provided that the overall viability of a development scheme is not compromised.</u>
New 13.8.11	New paragraph setting out the requirement for the provision of dwellings that meet the Category 2 and Category 3 requirements as set out in Building Regulations, as identified in the latest SHMA (2015).	<u>Part M of the Building Regulations sets a distinction between wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) and wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) dwellings. Planning Practice Guidance states that a policy requiring wheelchair accessible dwellings should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Therefore, the Council will negotiate a proportion of wheelchair adaptable (market and affordable housing) and/or wheelchair accessible (affordable housing only) dwellings on sites proposing 11 or more additional dwellings, as appropriate.</u>
HOU6 -Title	Policy title amended for clarity.	Policy HOU6 <u>Specialist</u> Housing for Older and Vulnerable People
HOU6 – Part I.	Policy wording amended for clarity.	I. <u>The Council will encourage the provision of specialist housing, across all tenures, for older and vulnerable people.</u> Proposals for new housing for older and vulnerable people will be expected to:
HOU6 – Part I.	Criterion (a) of policy deleted as issue is now addressed through new policy HOU7 Accessible & Adaptable Homes.	a) Offer a flexible approach, incorporating ‘Lifetime Homes’ standards and be capable of being readily adapted to meet the needs of those with disabilities and the elderly. A percentage of new specialist accommodation will be expected to be fully wheelchair accessible;
HOU6 – Part II.	Policy wording deleted and criterion added to Part I. of policy.	II. — Such proposals will be expected to be:
HOU6 – Part II. (now Part I.)	Policy wording amended for clarity.	(e) <u>Be Well</u> integrated with existing communities through the sharing of space and public access to services <u>where appropriate</u> ;
HOU6 – Part II. (now Part I.)	Criterion (d) of policy deleted as design issues are addressed through new Policy DES3.	(d) Of a non-institutional, safe and stimulating design, which meets not only the needs of its future residents but also the staff who work there and the visitors who may use it as a community resource.

HOU6 – Part I.	New criterion (e) added to policy to ensure that the integration of healthcare facilities is considered as part of development proposals.	<u>(e) Consider the integration of healthcare facilities within the development.</u>
HOU6 – New Part II.	New policy wording added setting out the requirement for specialist residential or nursing care accommodation within the C2 Use Class, as identified in the latest SHMA (2015).	II. <u>In addition to the overall housing target, a gross increase of at least 530 bed-spaces to help meet the accommodation needs of those who need specialist (Use Class C2) residential or nursing care will be supported in the District's towns.</u>
New Policy HOU7	New policy added requiring the provision of accessible and adaptable homes to ensure the changing needs of occupants are met over their lifetimes.	<p><u>Policy HOU7 Accessible and Adaptable Homes</u></p> <p>I. <u>In order to ensure delivery of new homes that are readily accessible and adaptable to meet the changing needs of occupants, and to support independent living, the Council will require that:</u></p> <p>(a) <u>all new residential development should meet the Building Regulations Requirement M4(2): Category 2 – Accessible and Adaptable Dwellings; and</u></p> <p>(b) <u>on sites proposing 11 or more gross additional dwellings, a proportion of dwellings will be expected to meet the Building Regulations Requirement M4(3): Category 3 – Wheelchair User Dwellings, where appropriate.</u></p> <p>II. <u>Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy, will new development be exempt from the requirement.</u></p>
New Section 13.9	New section added to reflect the duties placed on the Council by the Self-Build and Custom Housebuilding Act 2015.	<p><u>13.9 Self-Build and Custom Build Housing</u></p> <p><u>13.9.1 Self-Build or Custom Build housing is housing built or commissioned by individuals (or groups of individuals) to be occupied by themselves as their sole or main residence. For the purposes of planning policy, self-build and custom build dwellings share the same definition and the terms are used interchangeably. Self-build is where a person is directly involved in organising and constructing their home, whereas custom build is where a person commissions a specialist developer to help to deliver their own home. Both routes require significant input from the home owner in the design process of the dwelling.</u></p>

		<p><u>13.9.2 The Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to keep and have regard to a register of people who are interested in self-build or custom build projects in their area. In addition, local authorities are required to grant sufficient suitable development permissions on serviced plots of land to meet the demand, as evidenced by the number of people on the register, for self-build and custom build plots in their area.</u></p> <p><u>13.9.3 The Council considers that self-build and custom build housing can play an important part in contributing to the supply of housing, increasing the mix of housing types and tenures, and have the potential to increase the delivery of innovative and highly sustainable developments in a cost effective manner.</u></p> <p><u>13.9.4 Therefore, to support prospective self-builders, developers of sites proposing 200 or more dwellings, will be expected to supply a proportion of serviced dwelling plots for sale to self-builders.</u></p> <p><u>13.9.5 The Localism Act 2011 provides communities with the opportunity to encourage self-build and custom build housing by creating planning policies or allocating new development sites in their area. The Council will support locally proposed self-build projects identified within a Neighbourhood Plan wherever possible.</u></p>
New Policy HOU8 Self-Build Housing	New policy added to reflect the duties placed on the Council by the Self-Build and Custom Housebuilding Act 2015.	<p><u>Policy HOU8 Self-Build Housing</u></p> <p>I. <u>To support prospective self builders, on sites of more than 200 dwellings, developers will be expected to supply 5% of dwelling plots for sale to self builders, having regard to the need identified on the Council's Self-Build and Custom Build Register.</u></p> <p>II. <u>The Council will support locally proposed self-build projects identified within a Neighbourhood Plan wherever possible.</u></p> <p>III. <u>Planning permissions should include conditions requiring self-build developments to be completed within 3 years of a self-builder purchasing a plot.</u></p> <p>IV. <u>Where plots have been made available and marketed</u></p>

		<u>appropriately for at least 12 months and have not sold out, the plot(s) may either remain on the open market as self-build or be built out by the developer.</u>
13.9.1 (now 13.10.1)	Paragraph amended to improve grammar and delete unnecessary text.	In addition to meeting the needs of the settled population, national policy requires that local planning authorities make provision for Gypsies and Travellers and Travelling Showpeople, within their local plans, by setting respective pitch and plot targets to meet likely permanent and transit site accommodation needs in their area. Guidance is clear that Plans are likely to be found unsound if proper provision, which should be based on robust evidence of local need, is not made.
Box below 13.9.1 (now 13.10.1)	Wording updated to reflect publication of updated version of 'Planning policy for traveller sites', August 2015.	The national approach to planning for the needs of Gypsies and Travellers and Travelling Showpeople is set out in 'Planning policy for traveller sites' DCLG, March 2012 <u>August 2015</u> . This can be viewed and downloaded from the Government's publications website at: www.gov.uk/government/publications/planning-policy-for-traveller-sites A definition of Gypsies and Travellers and Travelling Showpeople <u>for planning policy purposes</u> is contained in Annex 1 of this document.
13.9.3 (now 13.10.3)	Paragraph updated to reflect permissions on individual sites rather than stating how many pitches have been provided to date, as that position may change prior to Examination in cases (making the text inaccurate) where currently not all permissions have been fully implemented.	There are currently three authorised private Gypsy and Traveller sites in East Herts: <ul style="list-style-type: none"> • Nine Acres, High Cross: 2 <u>8 permitted</u> pitches (with planning permission for an additional 6 pitches); • Field Farm, Levens Green: 4 <u>6 permitted</u> pitches (with planning permission for an additional 2 pitches); and • The Stables, Bayfordbury: 5 <u>8 permitted</u> pitches (with planning permission for an additional 3 pitches).
13.9.5 (now 13.10.5)	Paragraph updated to reflect the findings of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016.	The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, 201x, identified that xx permanent pitches and xx transit pitches for Gypsies and Travellers and xx plots for Travelling Showpeople should be provided in the district for the period up to 201x with a further xx permanent pitches and xx transit pitches for Gypsies and Travellers and xx plots for Travelling Showpeople for the period from 201x up to 20xx <u>The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016, identified that 5 permanent pitches for Gypsies and Travellers and 9 plots for Travelling Showpeople should be</u>

		<u>provided in the District for the period up to 2033.</u>
13.9.6 (now 13.10.6)	Paragraph updated to reflect the findings of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016.	<p>The Gypsies and Travellers Identification of Potential Sites Study, 201x, made recommendations on locations within which the need identified in the Gypsies and Travellers and Travelling Showpeople's Accommodation Needs Assessment could be met. <u>For Gypsies and Travellers, 2 pitches will be required up to 2022, with a further 3 pitches between 2022-2027. These pitch requirements arise from two sites at:</u></p> <ul style="list-style-type: none"> • <u>The Stables, Bayford (3 pitches), which will be met via expansion of that site; and</u> • <u>Unauthorised pitches at Esbies, Sawbridgeworth (2 pitches), which will be met within a new site for 15 pitches to be established within Birchall Garden Suburb, which will also contribute to meeting the needs of Welwyn Hatfield Borough.</u>
New 13.9.7 (now 13.10.7)	New paragraph to explain approach to meeting Gypsy and Traveller accommodation needs towards the end of the plan period.	<u>As the identification of accommodation needs for Gypsies and Travellers is less certain beyond year 10 of the plan, and an up-to-date understanding of the needs of Gypsy and Traveller communities will need to be maintained throughout the plan period, it is considered appropriate that provision should not be specifically allocated post-2027 without a demonstration of precise need at this time. However, in anticipation of future accommodation needs occurring, an additional Gypsy and Traveller site should be identified within the Gilston Area site allocation for future need towards the end of the plan period and/or beyond. Land should be safeguarded as part of the overall development of the site for such purposes.</u>
New 13.10.8	New paragraph to explain the identified accommodation needs of Travelling Showpeople to be met across the plan period.	<u>For Travelling Showpeople, 7 plots will be required up to 2022; one plot is required between 2022 and 2027; and a further plot between 2027 and 2033 (totalling 9 plots across the plan period). All of these plot requirements arise from the Rye House site, which is fully occupied with no room for expansion. A new yard should be identified within Gresley Park to provide 5 plots towards meeting the needs of the first five years; and 4 plots should also be allocated within the development to the North and East of Ware to meet the residual need across the plan period. In order to ensure that any, as yet unidentified, Travelling Showpeople's needs can be accommodated the allocated site to the North and East of Ware should also include sufficient safeguarded land for future expansion within a site area large enough to accommodate a total of 8 plots overall, as need dictates. Additionally, the Gilston Area should also include sufficient safeguarded land for future longer term provision within a</u>

		<p><u>site area large enough to accommodate a total of 8 plots overall.</u></p>												
<p>HOU7 (now HOU9) (I)</p>	<p>Policy updated to reflect findings of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016 and to provide specific pitch and plot allocations across the plan period.</p>	<p>Policy HOU79 Gypsies and Travellers and Travelling Showpeople</p> <p>I. To meet the identified need, xx pitches for Gypsies and Travellers and xx plots for Travelling Showpeople will be provided within the District at the following locations:</p> <p>Dependent on outcome of two shortly to be commissioned studies: Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, and Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study.</p> <p>To be shown in form of table with phasing.</p> <table border="1" data-bbox="1644 806 2677 1852"> <tr> <td colspan="2" data-bbox="1644 806 2677 846"> <p><u>Gypsy and Travellers:</u></p> </td> </tr> <tr> <td data-bbox="1644 846 2139 1005"> <p><u>The Stables, Bayford</u></p> </td> <td data-bbox="2139 846 2677 1005"> <p><u>3 pitches (2 to be provided in the period up to 2022; and 1 between 2022 and 2027) within the allocated site area.</u></p> </td> </tr> <tr> <td data-bbox="1644 1005 2139 1367"> <p><u>Birchall Garden Suburb, East of Welwyn Garden City</u></p> </td> <td data-bbox="2139 1005 2677 1367"> <p><u>4 pitches (to be provided between 2022 and 2027) within an area sufficient to accommodate a total of 15 pitches to meet the accommodation needs of both East Herts and Welwyn Hatfield and/or for future expansion, as evidence of need dictates.</u></p> </td> </tr> <tr> <td data-bbox="1644 1367 2139 1728"> <p><u>The Gilston Area</u></p> </td> <td data-bbox="2139 1367 2677 1728"> <p><u>To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 15 pitches, to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.</u></p> </td> </tr> <tr> <td colspan="2" data-bbox="1644 1728 2677 1768"> <p><u>Travelling Showpeople:</u></p> </td> </tr> <tr> <td data-bbox="1644 1768 2139 1852"> <p><u>Gresley Park, East of</u></p> </td> <td data-bbox="2139 1768 2677 1852"> <p><u>5 plots (each of sufficient size to</u></p> </td> </tr> </table>	<p><u>Gypsy and Travellers:</u></p>		<p><u>The Stables, Bayford</u></p>	<p><u>3 pitches (2 to be provided in the period up to 2022; and 1 between 2022 and 2027) within the allocated site area.</u></p>	<p><u>Birchall Garden Suburb, East of Welwyn Garden City</u></p>	<p><u>4 pitches (to be provided between 2022 and 2027) within an area sufficient to accommodate a total of 15 pitches to meet the accommodation needs of both East Herts and Welwyn Hatfield and/or for future expansion, as evidence of need dictates.</u></p>	<p><u>The Gilston Area</u></p>	<p><u>To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 15 pitches, to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.</u></p>	<p><u>Travelling Showpeople:</u></p>		<p><u>Gresley Park, East of</u></p>	<p><u>5 plots (each of sufficient size to</u></p>
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<p><u>Gresley Park, East of</u></p>	<p><u>5 plots (each of sufficient size to</u></p>													

		<p><u>Stevenage</u></p> <p><u>allow for the provision of accommodation and equipment plus storage/maintenance).</u></p> <p><u>North and East of Ware</u></p> <p><u>4 plots (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance) within the first phase of development to be provided within a larger area that should be safeguarded to allow for future expansion to a total of 8 plots, as evidence of need dictates.</u></p> <p><u>The Gilston Area</u></p> <p><u>To allow for longer-term accommodation needs, an area of suitable land should be safeguarded that would allow for future provision of a total of 8 plots (each of sufficient size to allow for the provision of accommodation and equipment plus storage/maintenance), to be delivered towards the end of the Plan period and/or beyond, as evidence of need dictates.</u></p>
HOU7 (now HOU9) II (c)	Insertion of 'or plots' to make it clear that the policy applies to applications for both Gypsies and Travellers and Travelling Showpeople's accommodation.	(c) proposals make adequate provision for on-site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of pitches <u>or plots</u> proposed;
HOU7 (now HOU9) III	Insertion of 'additionally' for clarity so that it is apparent that the criteria at II. also apply.	Proposals for sites accommodating Travelling Showpeople should <u>additionally</u> allow for a mixed use yard with areas for residential provision and the storage and maintenance of equipment. All other proposals for mixed residential and business activities will be assessed on a site specific basis, taking the above criteria into account.
New Section 13.11	New section added to address the accommodation needs of non-nomadic Gypsies and Travellers and Travelling Showpeople.	<p><u>13.11 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople</u></p> <p><u>13.11.1 The NPPF makes it clear that local planning authorities should consider the Government's 'Planning policy for traveller sites' (PPTS), in</u></p>

		<p><u>conjunction with the NPPF, when preparing plans or making decisions on travellers sites in their area. PPTS identifies a definition distinction that Gypsies and Travellers who no longer lead a nomadic lifestyle are treated as non-travelling Gypsies and Travellers for the purposes of the planning system and their needs must therefore be met by the requirements of the NPPF. However, the Human Rights Act 1998 and the Equalities Act 2010 protect their cultural choice to live in mobile accommodation and therefore there is a need to plan for park homes within the Plan.</u></p> <p><u>13.11.2 The Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment Update, May 2016, identified ten Gypsy and Traveller households and 16 Travelling Showpeople households who do not meet the PPTS definition. While the accommodation needs of these households has yet to be fully determined, provision will be met through the application of HOU1 and through the consideration of any other applications submitted, in accordance with the following policy.</u></p>
<p>New Policy HOU10 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople</p>	<p>New section added to address the accommodation needs of non-nomadic Gypsies and Travellers and Travelling Showpeople.</p>	<p><u>Policy HOU10 New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople</u></p> <p><u>I. Any applications for planning permission for Gypsy and Traveller and Travelling Showpeople park homes must be in accordance with the NPPF and PPTS and the following criteria should be satisfied:</u></p> <p><u>(a) the site is in a sustainable location in terms of accessibility to existing local services;</u></p> <p><u>(b) the site is suitable in terms of vehicular access to the highway, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage, and waste disposal;</u></p> <p><u>(c) proposals make adequate provision for on-site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of park homes proposed;</u></p> <p><u>(d) the proposal is well related to the size and location of the site and respects the scale of the nearest settled community;</u></p> <p><u>(e) the site can be integrated into the local area to allow for successful</u></p>

		<p><u>co-existence between the site and the settled community;</u></p> <p><u>(f) proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of local residents by reason of on-site business activities, noise, disturbance, or loss of privacy;</u></p> <p><u>(g) proposals ensure that the occupation and use of the site would not cause undue harm to the visual amenity and character of the area and should be capable of being assimilated into the surrounding landscape without significant adverse effect;</u></p> <p><u>(h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains;</u></p> <p><u>(i) within nationally recognised designations, proposals would not compromise the objectives of the designation.</u></p> <p><u>II. New traveller sites (whether temporary or permanent) in the Green Belt are inappropriate development and will not be approved except in very special circumstances.</u></p>
13.10.1 (now 13.12.1)	Paragraph wording amended for clarity.	The replacement of buildings on a one-to one basis can be a means of securing more functional buildings to meet present and future needs. The Council is <u>committed to maintaining the character and appearance of the District</u> anxious that the character of the District is maintained . Proposals for a replacement building should be in the same use and not be materially larger that <u>than</u> the one it replaces.
13.10.1 (now 13.12.1)	Correction.	The replacement of buildings on a one-to one basis can be a means of securing more functional buildings to meet present and future needs. The Council is anxious that the character of the District is maintained. Proposals for a replacement building should be in the same use and not be materially larger that <u>than</u> the one it replaces.
13.11.2 (now 13.13.2)	Paragraph wording amended to reflect amendment to Policy Number and title from DES1 to DES3.	The Council will expect all proposals for extensions and alterations to dwellings and residential outbuildings to be of a high standard of design that is appropriate to the character and appearance of the dwelling and the surrounding area. All householder development proposals should be

		sensitively designed to ensure that they would not have an unacceptable impact upon the amenities of the occupiers of the existing dwelling and any neighbouring dwellings. In particular the Council will assess proposals having regard to any loss of light, privacy and outlook and overbearing impacts that the development could have upon existing and future occupiers of the host dwelling and adjoining dwellings. In addition to the policies below, applications for extensions will also be considered against Policy DES1 DES3 (Local Character and Amenity Design of Development) where appropriate.
HOU9	Policy deleted and elements of policy wording added to Policy HOU11 (formerly HOU10) and GBR2.	<p>Policy HOU9 Extensions to Dwellings</p> <p>I. Planning permission will be granted for extensions to existing dwellings, provided that the character and appearance of the dwelling and surrounding area, and the amenities of the current and future occupiers of the dwelling and any adjoining dwellings would not be significantly affected to their detriment.</p> <p>II. Within the Green Belt and Rural Area Beyond the Green Belt in addition to the above, planning permission will be granted for extensions to existing dwellings provided that they do not result in disproportionate additions over and above the size of the original dwelling (including existing outbuildings) nor intrude into the openness of the site and the surrounding area.</p> <p>III. All proposals will be considered against the criteria set out in Policy HOU10 (Extensions and Alterations to Dwellings and their Curtilage).</p>
HOU10 (now HOU11)	Policy amended for clarity and to incorporate elements of policy wording from deleted policies HOU9 (Extensions to Dwellings) and HOU11 (Residential Outbuildings).	<p>Policy HOU11 Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within their Residential Curtilages</p> <p>Proposals for:</p> <ul style="list-style-type: none"> • extensions and alterations to dwellings; • residential outbuildings or extensions to existing outbuildings; and • works within their residential curtilages. <p>will be considered in accordance with Policies GBR1 and GBR2, Policy HOU9 (Extensions to Dwellings) and against the following criteria:</p> <p>(a) proposed extensions or alterations to dwellings should be of a size, scale, mass, form, siting, design and materials of construction that are appropriate to the character, appearance and setting of the existing</p>

		<p>dwelling and/or the surrounding area, and extensions should generally appear as a subservient addition to the dwelling;</p> <p>(b) side extensions at first floor level or above should ensure appropriate space is left between the flank wall of the extension and the common curtilage with a neighbouring property (as a general rule a space of 1 metre will be the minimum acceptable), to safeguard the character and appearance of the street scene and prevent a visually damaging 'terracing' effect;</p> <p>(c) flat roofed extensions, except those on the ground floor, will be refused as visually undesirable other than in those exceptional circumstances where the character of the original dwelling allows a flat-roofed design to be appropriately incorporated, <u>or it represents a sustainable or innovative design approach</u>;</p> <p>(d) roof dormers may be acceptable if appropriate to the design and character of the original dwelling and its surroundings. Dormers should generally be of limited extent and modest proportions, so as not to dominate the existing roof form.</p>
HOU11	Policy deleted and elements of policy wording added to Policy HOU11 (formerly HOU10) and GBR2.	<p>Policy HOU11 deleted</p> <p>Policy HOU11 Residential Outbuildings</p> <p>Proposals for residential outbuildings or extensions to existing outbuildings will be considered against the following criteria:</p> <p>(a) where located within the Green Belt and Rural Area Beyond the Green Belt, proposals for residential outbuildings should not result in disproportionate additions over and above the size of the original dwelling (including existing outbuildings) nor intrude into the openness of the site and the surrounding area;</p> <p>(b) be of an appropriate size, scale, mass, form, siting, design and materials of construction such that the character and appearance of the site and its surroundings, and the amenities of the current and future occupiers of the dwelling and any adjoining dwellings would not be significantly affected to their detriment.</p>

HOU13	Policy amended for clarity	<p>Amendment to Policy HOU13:</p> <p>I. Residential annexes will be permitted where:</p> <p>(a) the accommodation forms an extension to the main dwelling and is capable of being used as an integral part of the dwelling or forms a separate outbuilding which is close to and well related to <u>and have a clear functional link to</u> the main dwelling;</p> <p>(b) the scale of the annexe does not dominate the existing dwelling and is the minimum level of accommodation required to support the needs of the occupant;</p> <p>(c) sufficient space to park vehicles for both parts of the dwelling, in accordance with adopted standards, is available and appropriately located in design terms within the curtilage;</p> <p>(d) the development accords with <u>Policyies HOU9 (Extensions to Dwellings) HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works within Residential Curtilages) and HOU12 (Residential Outbuildings).</u></p> <p>II. Where planning permission is granted for a residential annexe, planning conditions may be imposed to ensure that the occupation of the annexe remains tied to the main dwelling.</p>
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