

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
<b>14.1 Introduction</b>	
14.1	<u>Other Comments and Observations</u> 1. Query as to what the Council has done to bring empty homes back into use. Council should acquire properties using compulsory purchase powers.
<b>14.2 Type and Mix of Housing</b>	
14.2	<u>Other Comments and Observations</u> 1. The use of pre-fabricated housing should be encouraged to speed up building and reduce the cost.
14.2.1	<u>Objection</u> 1. Object to reference to paragraph 47 of the NPPF not including the full wording. Suggest modification to text to include 'as far as this is consistent with the policies set out in this Framework'.
14.2.2	<u>Other Comments and Observations</u> 1. The NPPF should be added to the list of documents that housing requirements will be informed by.
HOU1	<u>Support</u> 1. Policy provides sufficient flexibility to allow sites to respond to local requirements, such as local character, in providing an appropriate mix of housing. 2. Support expressed for policy as it recognises the need for the provision of specialist housing. <u>Objection</u> 1. Requirement for small development sites to provide a mix of housing tenures, types and sizes is interference in the housing market and may impact on viability. 2. Mix of housing on each site should be determined on a site-by-site basis and should vary

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	<p>depending on the location of the development and the character of the surrounding area.</p> <ol style="list-style-type: none"> <li>3. There needs to be flexibility with regards to the housing mix to be provided on each site.</li> <li>4. A high proportion of large homes that attract commuters should not be developed in settlements located away from railway stations to minimise car travel.</li> </ol> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> <li>1. Further clarity is required as to what is required in terms of affordable housing. Unclear whether affordable housing is required from sites of 5 or more dwellings.</li> <li>2. Housing should be provided that caters for the needs of all sections of society.</li> </ol>
<b>14.3 Housing Density</b>	
HOU2	<p><u>Support</u></p> <ol style="list-style-type: none"> <li>1. Support for flexible wording of the policy which enables development proposals to respond to local circumstances through a design-led process.</li> </ol> <p><u>Objection</u></p> <ol style="list-style-type: none"> <li>1. Policy should be promoting higher density development on sites in key locations (town centres, close to transport hubs and potentially in the proposed strategic development locations).</li> <li>2. Policy is not distinctive to East Herts.</li> <li>3. Policy should state what ‘high’, ‘medium’ and ‘low’ net densities would be to provide clarity.</li> <li>4. Policy sets lower densities for housing development in villages but should be acknowledged that some villages have brownfield sites which should also be taken into consideration when assessing local character.</li> <li>5. Policy is unclear about the approach to be taken to development of strategic sites, eg. the Gilston Area. Suggest modification to policy wording to make reference to the density work undertaken for the Gilston Area Concept Framework.</li> </ol> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> <li>1. Query as to how the character of a local area will be taken into account when proposing a</li> </ol>

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	<p>sensitive housing density for a development.</p> <p>2. The guidelines for the density of development should not be applied rigidly.</p>
<b>14.4 Affordability and the Housing Market</b>	
14.4	<p><u>Objection</u></p> <p>1. Specific site promoted for allocation to help meet the identified need for affordable housing.</p>
14.4.7	<p><u>Other Comments and Observations</u></p> <p>1. A flexible approach to affordable housing tenure and mix should be adopted to ensure that affordable housing targets can be met on development schemes.</p> <p>2. Suggest modification to state that the affordable housing mix requirements may change over the lifetime of the Plan.</p>
HOU3	<p><u>Support</u></p> <p>1. Positive policy on the need for, and provision of, affordable homes.</p> <p>2. Support acknowledgment that affordable housing requirement can be subject to viability testing.</p> <p>3. Support expressed for the varying percentage requirement for affordable housing dependent on number of units delivered.</p> <p>4. Support the wording of Part II of the policy which provides flexibility for starter homes to be delivered.</p> <p><u>Objection</u></p> <p>1. Query the soundness of the assessment of affordable housing need set out in the SHMA, in that it doesn't take into account those who delay making housing plans due to affordability.</p> <p>2. The use of 'up to' in the policy wording invites developers to apply for a lower amount. A mandatory percentage should be stated in the policy.</p> <p>3. Policy wording is weak and it should be stated that the provision of less than 30% affordable housing will only be permitted in exceptional circumstances.</p>

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	<p>4. Object as policy requires affordable housing provision on sites delivering less than 10 dwellings which isn't in accordance with national policy.</p> <p>5. Object to the calculation of affordable housing being based on gross supply rather than net additions.</p> <p>6. Part II of policy should be amended to state that the affordable housing mix sought will reflect the housing need at the point of determining a planning application.</p> <p>7. Policy should state how affordable homes will remain affordable in perpetuity.</p> <p>8. Object to policy seeking to retain affordable housing as affordable in perpetuity as this fails to recognise the amendments proposed to the definition of affordable housing in the NPPF.</p> <p>9. Lower provision of affordable housing should be made on developments located more than 2 miles from a railway station.</p> <p>10. Object to the reference to 'pepper-potted' as this can cause a range of management challenges. Suggest modification to make reference to 'clustering' instead.</p> <p><u>Other Comments and Observations</u></p> <p>1. Change to national policy, such as extension of Right to Buy, will negatively affect supply of affordable homes.</p> <p>2. Concern expressed that 'affordable housing' is unaffordable for many people.</p> <p>3. Plan needs to take account of how the policies adopted by the Council can influence the migration trends identified in the SHMA.</p> <p>4. Policy could be improved by providing detail and seeking specific provision of key worker housing.</p> <p>5. Developers should be prevented from selling affordable housing to London Councils.</p> <p>6. Affordable housing should be used for local requirements and should not be allocated to other authorities.</p>
<b>14.6 Rural Exception Sites</b>	

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HOU4	<u>Objection</u> 1. Policy makes no reference to Green Belt policy. This should be included as a criterion in the policy. 2. Object to Part IV of policy as there is no legislation in place to prevent dwellings being sold on the open market in 5 years.
<b>14.8 Housing for Older and Vulnerable People</b>	
14.8.2	<u>Objection</u> 1. Better reference should be made to the fact that vulnerable people includes people with learning disabilities. Suggest modification to split reference to the elderly, people with disabilities and vulnerable people.
14.8.5	<u>Objection</u> 1. No reference is made to the identified housing needs of people with disabilities or other vulnerable groups.
14.8.6	<u>Objection</u> 1. Suggest reference is made to the need for C3 specialist accommodation to meet the housing needs of vulnerable people, eg. supported housing schemes.
HOU6	<u>Support</u> 1. Support expressed for principle of policy. <u>Objection</u> 1. Policy does not allocate sites to ensure the delivery of 530 bedspaces (Use Class C2). 2. Policy should make specific reference to vulnerable people as the policy currently only provides for older peoples housing needs. Suggest modification to the policy to state that in addition to the overall housing target , provision should be made for the housing needs of those vulnerable people who require C3 including C3(b) homes. <u>Other Comments and Observations</u>

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	<ol style="list-style-type: none"> <li>1. An appropriate definition is required (whether in the policy or in the glossary) that defines vulnerable people in the context of this policy.</li> <li>2. Specific site promoted for the delivery of specialist housing in the form of retirement homes.</li> </ol>
HOU7	<p><u>Support</u></p> <ol style="list-style-type: none"> <li>1. Support the flexibility of Part I(b) of the policy as it doesn't require a specific percentage of wheelchair user dwellings to be delivered.</li> </ol> <p><u>Objection</u></p> <ol style="list-style-type: none"> <li>1. Object to the reference to Building Regulations Requirements in the policy as the Government warns against including reference to non-planning legislation.</li> <li>2. Unable to locate any compelling evidence for the need for these optional standards. Council needs to demonstrate the necessity for this policy requirement.</li> <li>3. Policy lacks clarity as little guidance with regards to the quantum of housing that will be required to meet the Building Regulations Requirement M4(3) Category 3 – Wheelchair User Dwellings.</li> <li>4. Suggest modification to state that compliance with this policy will be required where there is evidence of local demand.</li> <li>5. The assessment of Plan viability has not considered the viability implication of requiring compliance with the Part M optional technical standards.</li> </ol>
<b>14.9 Self-Build and Custom Build Housing</b>	
HOU8	<p><u>Objection</u></p> <ol style="list-style-type: none"> <li>1. No evidence within the SHMA to indicate demand for 5% of plots to be allocated for self-builders.</li> <li>2. Imposing a strict percentage requirement for self-build plots will impact efficient delivery of housing.</li> <li>3. The requirement for 5% of plots to be allocated for self-builders is not appropriate for larger,</li> </ol>

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	<p>strategic sites.</p> <ol style="list-style-type: none"> <li>4. Suggest modification to state that the appropriate proportion of self-build plots will be determined having regard to the overall housing mix of the development.</li> <li>5. Self-build housing plots should be delivered through the allocation of smaller designated sites allocated specifically for self-build, rather than as part of a larger site.</li> <li>6. The requirement for large sites to supply 5% of plots to self-builders will hinder the delivery of a comprehensive and holistic development, particularly with regard to design. For example, the delivery of self-build plots would not be feasible on a site suitable for higher density flatted development.</li> <li>7. Object as the development of self-build plots as part of a larger site will significantly increase development costs, and may negatively impact the sale prices of houses, compromising overall viability of the development.</li> <li>8. Object as it would compromise the security of a development site and the safety of on-site workers.</li> <li>9. Suggest deletion of Part III of policy as prospective self-builders may be put off by a three year time limit for completion.</li> </ol> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> <li>1. Unclear whether the delivery of self-build plots counts towards the affordable housing provision required on a site.</li> </ol>
<b>14.10 Gypsies and Travellers and Travelling Showpeople</b>	
HOU9	<p><u>Support</u></p> <ol style="list-style-type: none"> <li>1. Policy considered to be sound and will meet the district's identified need for Gypsies and Travellers and Travelling Showpeople.</li> <li>2. Assessment of need considered robust and thorough.</li> <li>3. Support for Part (h), but strengthening of Policy by specifying "all highly vulnerable</li> </ol>

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	<p>development is located in Flood Zone 1” suggested.</p> <p><u>Objection</u></p> <ol style="list-style-type: none"> <li>1. Discrepancy between pitch provision numbers of EHC and WHBC. The lack of collaboration in assessment of needs in each authority results in failure of the Duty to Co-operate.</li> <li>2. Due to in-principle Green Belt policy objection to allocations at EWEL1, EOS1, GA1, and WARE2, consequential removal of pitches and plots for Gypsies and Travellers and Travelling Showpeople identified at these locations is sought.</li> <li>3. Objection to siting of Gypsy and Traveller site within 400m of existing Holwell Site and 2 miles from Barbaraville Site as contradicting DGLG guidance.</li> <li>4. Neither EH or WHD council approached any of the settled community near existing sites in undertaking their assessments.</li> <li>5. Situating a Gypsy and Traveller site in the Green Belt contrary to national policy.</li> <li>6. As Gypsy and Traveller sites “should not dominate the settled community” and the Holwell site is already considered to dominate settled community of 17 properties, adding another 15 pitches nearby would be contrary to policy and, suggested, illegal.</li> <li>7. Proposed new site at EWEL1 will be adjacent to housing development. No evidence that Gypsies would favour this or vice versa. The Plan lacks a robust assessment with the gypsy community. Council is not showing evidence of engagement with hard to reach communities.</li> <li>8. Huge discrepancy between the pitch provision numbers being promoted in WHBC’s Plan and EHC’s Plan. WHBC has stated a need of 61 additional pitches. Duty to Co-operate has failed because there was no collaboration on assessment of need.</li> </ol> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> <li>1. Continued monitoring of Gypsy and Traveller accommodation within the District, including the number of unauthorised sites and vacant sites, along with the monitoring of the five year supply of gypsy and traveller accommodation through the Annual Monitoring Report requested.</li> </ol>



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<b>14.12 Replacement Buildings in the Green Belt and the Rural Area beyond the Green Belt</b>	
14.12.1	<u>Other Comments and Observations</u> 1. When considering proposals for replacement dwellings, Council should allow previously granted planning permissions and unexpended permitted development rights to be included in the overall house size allowable.
<b>14.13 Extensions and Alterations to Dwellings and Residential Outbuildings</b>	
HOU11	<u>Objection</u> 1. Policy is unnecessary in light of General Permitted Development Order. 2. Concern that there is no provision for large houses to be converted into multiple smaller units.
<b>14.15 Residential Annexes</b>	
HOU13	<u>Other Comments and Observations</u> 1. Policy is important given the shortage in suitable housing for the elderly and vulnerable people.