

EHDC Affordable Homes SPD Consultation Draft 30/01/2020-27/02/2020

1. The response to this consultation is submitted on behalf of the Bengoe Neighbourhood Area Plan Community Steering Group. The submission of the Neighbourhood Plan Regulation 15 Draft to East Herts District Council (EHDC) is imminent.
2. We note that paragraph 2.0.3 of the SPD states that, following revisions to the National Planning Policy Framework in July 2018 and February 2019, it is unlikely that EHDC will seek affordable housing contributions on sites with less than 10 dwellings, unless the site is 0.5 hectares or more (or national policy is changed). We regard this national policy change as regrettable. In the Neighbourhood Plan Area, small sites may come forward for development in the period up to 2033. Unless those sites are larger than 0.5 hectares, this policy revision would effectively rule out the possibility of any affordable housing provision on those sites, which is unfortunate, given how expensive property is to buy and rent. During consultation on the Neighbourhood Plan, residents said they would like more affordable housing in the Neighbourhood Plan Area. We would support retention of the current policy wording in HOU3: Affordable Housing.
3. We support the principles outlined in paragraphs 2.0.6 and 2.0.8 in the SPD i.e.:
 - to ensure (on sites with significantly more affordable housing than required by Policy HOU3) that the policy compliant level of affordable housing will be secured as affordable for first and subsequent property owners, and that there are provisions for recycling subsidy should the property no longer be an affordable unit
 - that the inclusion of affordable housing on a development should include provisions for housing to either remain at an affordable price for future eligible households and/or that any recycled grants are to be spent on the provision of affordable housing within East Herts.
4. We support the principle of mixed, inclusive and sustainable communities and endorse the commitment in para 3.3.3 to distribute affordable housing across development sites.

Bengoe Neighbourhood Area Plan Steering Group
26 February 2020