

Issue Number	Issues raised through consultation	Officer response
General Issues		
1.0	This is not a local plan but a plan for implementing policies that have been imposed on the district from the outside. There should be recognition that EHC have been pressured into these proposals.	<p>No amendment to Plan in response to this issue</p> <p>Whilst the East Herts District Plan has been prepared in accordance with the National Planning Policy Framework, the Plan sets out the local vision and strategic priorities for the area, together with district-wide and settlement specific policies on the homes and jobs needed in the area. A wide section of the community has been proactively engaged in the preparation of the District Plan, which reflects as far as possible an agreed set of priorities for the sustainable development of the area.</p>
1.1	HCC is concerned with regards to Household Waste Recycling Centres and their capacity to deal with the proposed developments. There are moderate concerns for the: Buntingford, Ware and Cole Green sites and a significant concern for the Bishop's Stortford site. Re-location of the Bishop's Stortford site should be considered, perhaps to the west of the town.	<p>No amendment to Plan in response to this issue</p> <p>The management of household waste is a County matter; however the Council is continuing to work with HCC to identify potential locations for household waste and recycling centres.</p>
1.2	It is unclear from Chapter 1 whether the District Plan provides the approach envisaged by NPPF. There are site specific allocations but the creation of further DPDs is noted. Demonstration of why work must be referred to later DPDs and cannot be included in the District Plan must be provided.	<p>No amendment to Plan in response to this issue</p> <p>Since undertaking the Preferred Options consultation, the Council has continued to gather a significant amount of technical evidence. Given the evidence that is now in place, Officers consider that the 'Broad Locations for Growth' (North and East of Ware, East of Welwyn Garden City and the Gilston Area) should now be included as site allocations within the District Plan, without any further requirement for separate DPDs. Further information will be provided in Settlement Appraisal for each location which will be presented to the District Planning executive Panel on the 25th August.</p>
1.3	Bishop's Stortford Civic Federation has little confidence that EHC will adhere to an up to date District Plan if tempted by opportunistic developers. Reference is made to the Local Plan 2007 and the development of unallocated Old River Lane/Causeway site.	<p>No amendment to Plan in response to this issue</p> <p>Concern noted, however, opportunities will always be presented for development regardless of the stage of preparation of a local plan.</p> <p>The Old River Lane site is allocated within the emerging District Plan for mixed use development including for retail, leisure and residential development.</p>

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1.4	The District Plan does not give adequate consideration to local issues. More weight should be given to local issues rather than policies that apply to the whole district.	<p>No amendment to Plan in response to this issue</p> <p>The District Plan is a strategic document which is the key to delivering sustainable development that reflects the vision and aspirations of local communities.</p> <p>Neighbourhood Planning offers local people the opportunity to ensure that they get the right types of development for their community, taking account of local issues.</p>
1.5	The Council has previously promised infrastructure to be provided in hand with development, however there is no evidence of this in the District Plan. Development will be unsustainable; infrastructure will be stretched (roads, medical facilities, schools, rail services).	<p>No amendment to Plan in response to this issue</p> <p>The Infrastructure Delivery Plan, to be presented to Members alongside the final District Plan in September, will provide a significant level of information with regards to infrastructure requirements and phasing. Further information is also provided within the Delivery Study.</p>
1.6	The East Herts District Plan should be shaped by the community and not just provide high density development, commercial malls and commercial leisure centres.	<p>No amendment to Plan in response to this issue</p> <p>The District Plan has been shaped by the community through both the Issues and Options Consultation and the Preferred Options Consultation. The community will also have a further opportunity to make representation at the Submission stage.</p>
1.7	Development HERT4 is not deliverable, accessible or sustainable.	<p>No amendment to Plan in response to this issue</p> <p>These issues are covered under the Issues Report for Chapter 7: Hertford.</p>
1.8	Thousands of houses and a shopping centre could be built at Standon and Puckeridge. It is close to the A10 and not in the Green Belt.	<p>No amendment to Plan in response to this issue</p> <p>The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable approach.</p> <p>A potential new / expanded settlement option was considered in the A10 corridor but it was concluded that this would not be deliverable within the plan-period.</p>
1.9	Concern raised over the loss of the Green Belt.	<p>No amendment to Plan in response to this issue</p> <p>The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a</p>

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		sustainable approach.
1.10	Towns should be ranked in terms of available brownfield sites/infill opportunities, before green belt is used for development.	<p>No amendment to Plan in response to this issue</p> <p>The Council has always sought to bring forward brownfield sites wherever possible. This includes the Goods Yard in Bishop's Stortford and the Mead Lane area in Hertford which are proposed for allocation within the District Plan. However, being a predominantly rural district, there are very few brownfield sites available. Therefore development on greenfield / Green Belt sites is required.</p>
1.11	Objection to development East of Welwyn Garden City, on the grounds of loss of greenbelt, coalescence of towns, lack of infrastructure (roads, medical facilities).	<p>No amendment to Plan in response to this issue</p> <p>These issues are covered under the Issues Report for Chapter 11: East of Welwyn Garden City.</p>
1.12	<p>Concern raised that a number of villages have had their categorisation changed when no facilities have been added.</p> <p>For example: Birch Green has been changed from a Category 3 to a Category 2 village.</p>	<p>No amendment to Plan in response to this issue</p> <p>The Council has undertaken further work on village categorisation and the overall village strategy. This work has been on-going with local Member and Parish Council input throughout the process.</p> <p>These issues will be covered in the Issues Report for Chapter 10: Villages, which will be presented to the District Planning Executive Panel on the 25th August.</p>
1.13	Demographic projections are questioned, why is there a need for 15,000 houses to be built?	<p>No amendment to Plan in response to this issue</p> <p>The NPPF requires Local Plans to meet the <i>'full objectively assessed needs for market and affordable housing ...'</i> (paragraph 47). In East Herts the Objectively Assessed Housing Need (OAHN) is for at least 745 new homes per year over the plan-period. This is based on evidence set out in the Council's Strategic Housing Market Assessment (SHMA). The SHMA identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which meets household and population projections, taking account of migration and demographic change, and market signals such as affordability.</p>
1.14	The amount of development allocated to Ware is disproportionate in relation to other settlements. It will result in the loss of character of Ware and further congestion. The council must listen to the residents of Ware and adapt the proposals accordingly.	<p>No amendment to Plan in response to this issue</p> <p>Apart from the SLAA and former Co-op Depot sites, which would jointly deliver 32 homes (which is considered to be small in scale), the Preferred Options Consultation also proposed development to the North and East of Ware which was</p>

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		<p>phrased as being within a range of between 200 and 3,000 dwellings. Technical work undertaken since the consultation, coupled with the HCC Highways' position in respect of the ability of the local and wider road network to accommodate trips generated from development in Ware in addition to information provided by other service providers, means that Officers consider that upper levels of development should be discounted.</p> <p>While the scale of development should be sufficient to provide the critical mass needed to ensure the provision of necessary infrastructure, services and facilities, it is important that the development should complement the existing character of the town.</p> <p>The final quantum of development to be delivered on land to the North and East of Ware will be considered through the Ware Settlement Appraisal which will be presented to the District Planning Executive Panel on 25th August.</p>
1.15	The plan has not taken into consideration transport needs, economic development, environmental or social impacts on Sawbridgeworth.	<p>No amendment to Plan in response to this issue</p> <p>These issues are covered under the Issue Report for Chapter 8: Sawbridgeworth.</p>
1.16	The Draft District Plan does not include important information that can be found in the supporting documents. There is a concern that people will not fully understand what is being proposed. For example, there is mention in the supporting document of 200 dwellings to be built on High Oak Road/Fanhams Hall Road, Ware but no reference in the Draft District Plan.	<p>No amendment to Plan in response to this issue</p> <p>The Government's Planning Practice Guidance requires local plans to be as focused, concise and accessible as possible. As such the Council has included as much information as is reasonable within the District Plan document. The District Plan, however, is supported by a vast evidence base, which is clearly signposted by information boxes contained within the Plan.</p>
1.17	The EHC webpages are out of date. The call for sites/SLAA data sets are missing sites. This may give the public a false picture of the amount of sites up for development. The SLAA process has not been completed, therefore the Draft District Plan has been released too early.	<p>No amendment to Plan in response to this issue</p> <p>The Council makes every effort to update its website.</p> <p>The SLAA considers whether sites <i>could</i> be developed not whether they <i>should</i> be developed and therefore informs the Council's understanding of potential land availability which could be brought forward as part of a rolling supply of land available for housing.</p>

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1.18	It was very difficult to comment on the District Plan, the IT portal was very hard to use and many residents (Bishop's Stortford and Ware) did not receive the District Plan documents. This is probably why there are so few comments. The consultation should be repeated to give people adequate chance to comment.	<p>No amendment to Plan in response to this issue</p> <p>The Council received a good level of participation from the community and has received a large number of responses to the consultation. The Regulation 19 Consultation on the proposed Submission District Plan taking place this autumn gives residents the opportunity to make further representations.</p>
1.19	Recognition for the Authority's efforts in seeking to get the Local Plan in place, as soon as is practical. Without a plan in place the district would be vulnerable to speculative and unsustainable development. There is a balance to be struck between a speedy process and proper consultation, but it is important that the adoption of Local Plan is not delayed.	<p>No amendment to Plan in response to this issue</p> <p>The Council has made every effort to move the plan forward as quickly as possible to prevent speculative development whilst also incorporating full and necessary public consultation. It is also important is to ensure that the District Plan is sound so that it can pass examination. As noted there is an important balance to be struck and submitting a Plan that is not 100% sound would push back adoption dates further.</p>
1.20	The plan does not recognise the current traffic and service problems even before these are exacerbated by dramatic housing/population expansion.	<p>No amendment to Plan in response to this issue</p> <p>The Council is fully cognisant of existing problems and is aware that, in order to ensure the delivery of sites within the Plan, any necessary mitigating infrastructure must be identified and provided at the most appropriate time in the development process.</p> <p>In regards to the existing traffic problems investigations are being undertaken by HCC to seek to mitigate congestion as part of ensuring that the highway network can operate with the additional development proposed. It should be noted that HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit.</p>
1.21	Support is noted for the overall District Plan. It is important that there are clear divisions between built-up areas so that the character of the district is maintained.	<p>No amendment to Plan in response to this issue</p> <p>Support noted and welcomed. The potential coalescence of settlements has been a key consideration of the Council when identifying sites for development.</p>
1.22	The plan has been dictated by pressures from developers and Central Government.	<p>No amendment to Plan in response to this issue</p> <p>Whilst the East Herts District Plan has been prepared in accordance with the National Planning Policy Framework, the Plan sets out the local vision and strategic priorities for the area, together with district-wide and settlement specific policies on</p>

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		the homes and jobs needed in the area. A wide section of the community has been proactively engaged in the preparation of the District Plan, which reflects as far as possible an agreed set of priorities for the sustainable development of the area.
1.23	The District Plan proposals are absurd and unsustainable. Any District Councillor who is voting on this plan should resign to make the plan an election issue.	<p>No amendment to Plan in response to this issue</p> <p>The District Plan has been shaped by the community through both the Issues and Options Consultation and the Preferred Options Consultation. The District Councillors have supported and been involved throughout the process.</p>
1.24	Objection to the plan as the evidence gathering stage is incomplete.	<p>No amendment to Plan in response to this issue</p> <p>The Council is confident that the District Plan is based on robust, up-to-date and relevant evidence in accordance with the NPPF.</p>
1.25	Shire Consulting state that the District Plan in its current form is too long, steps should be taken to reduce the number of policies and extraneous verbiage throughout the plan. A great number of policies are not specific to East Herts and add nothing to NPPF or NPPG, these include: GBR1, GBR3, DES1, EQ2, EQ3, EQ4, TRA1, TRA2, HA1, HA2, HA3, HA7, HA9, NE1, NE2, WAT1, WAT2, WAT3 and WAT5.	<p>No amendment to Plan in response to this issue</p> <p>Not agreed. Together the policies and supporting text in the District Plan provide a locally distinctive framework for decision making.</p>
What is the District Plan?		
1.26	Figure 1.1 is inappropriate, unnecessary and over-simplistic.	<p>No amendment to Plan in response to this issue</p> <p>Noted. Chapter 1 will be re-drafted to present an up-to-date introduction to the Plan.</p>
Preparation of the District Plan		
1.27	Hertfordshire Ecology is concerned with how much confidence can be placed in green infrastructure plans to provide the context for securing the desired objectives. The habitat-based contextual LNP Ecological Network maps in places bear little or no relation to the map of Habitats and Biodiversity plan. Some reference to practical implementation of projects or support of appropriate land use would	<p>No amendment to Plan in response to this issue</p> <p>These issues are covered under Chapter 19: Natural Environment. The policies within Chapter 19 and within each strategic allocation seek to ensure a net gain in biodiversity. Hertfordshire Ecology is a key stakeholder and will be engaged in</p>

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	be helpful in this respect.	masterplanning for strategic development where appropriate.
1.28	Hertfordshire Ecology states that an up to date evidence base is essential. In respect of biodiversity, this is reflected in the role of Hertfordshire Environment Records Centre (hosted by Herts & Middlesex Wildlife Trust).	<p>No amendment to Plan in response to this issue</p> <p>These issues are covered under Chapter 19: Natural Environment. The policies within Chapter 19 and within each strategic allocation seek to ensure a net gain in biodiversity. Hertfordshire Ecology is a key stakeholder and will be engaged in masterplanning for strategic development where appropriate.</p>
Working with Neighbouring Authorities and Key Stakeholders		
1.29	There is little evidence of joint working with surrounding authorities. There are large developments around the towns of WGC, Harlow and Hatfield, which will require strategic cooperation. Why is evidence of joint working not incorporated into the District Plan?	<p>No amendment to Plan in response to this issue</p> <p>This Council is working closely with our neighbouring authorities including through the creation of joint policies, masterplans, Memorandums of Understandings and evidence bases. All minutes of Duty to Co-operate meetings are presented to the District Planning Executive Panel and are recorded on the Council's website. A Duty to Co-operate Compliance Statement will be published in due course.</p>
How can you comment on District Plan?		
1.30	What is submission participation? How does consultation differ from participation?	<p>No amendment to Plan in response to this issue</p> <p>This is the final stage for making representations before the District Plan is submitted for independent examination by a government appointed Planning Inspector. This stage offers the opportunity for members of the public and other stakeholders to make representations on whether the District Plan has been prepared in accordance with legal requirements and whether it is sound (i.e. whether the Plan has been positively prepared, is justified, effective and consistent with national policy). Any representations made at this stage will be summarised by the Council and sent to the Planning Inspector.</p>