Chapter Name: Vision and Strategic Objectives

Issue Number	Issues raised through consultation	Officer response
General Is	ssues	
2.1	There is a presumption that large scale development is inevitable, small scale development would be more appropriate. There are houses outside of East Herts that are unoccupied.	No amendment to Plan in response to this issue Strategic scale development is required. The NPPF requires Local Plans to meet the 'full objectively assessed needs for market and affordable housing' (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 assessment is made within a Housing Market Area (HMA) which includes a number of neighbouring authorities and considers their housing situation and needs as well.
		Policies in the District Plan must be appropriate for the large-scale delivery of housing.
2.2	What is this housing crisis? What sorts of houses are needed? Why so many in East Herts? Development on this level will threaten the quality of life of residents.	No amendment to Plan in response to this issue There has been a UK housing crisis for a number of years where the supply of housing has fallen dramatically behind the demand. This is particularly prominent in the south of England where its proximity to London is increasingly desirable. 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 East Herts and its residents.
2.3	The government must identify homes needed for local communities. This could be achieved by re-introducing building of council housing, which is owned by the council and never sold.	No amendment to Plan in response to this issue The Strategic Housing Market Assessment (SHMA) identifies the districts housing need including the mix/size/tenure of homes required. The East Herts Housing Needs Survey (2014) addresses more localised housing needs within the district. The level of need across the district is not something that the Council would be able to deliver.

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2.4	The plan does not cater for economic growth in East Herts; rather the new developments seem to be for London. Currently the average person is being priced out of London, this will soon happen to East Herts. Commuting by rail will also become even more difficult.	No amendment to Plan in response to this issue East Herts is a mainly rural district which, by its nature, is partly reliant on larger neighbouring urban areas to meet the employment needs of its residents, e.g. it has an historic pattern of rail commuting into London. The SHMA however has considered the relationship between housing and the need to plan for additional employment opportunities and, accordingly, the District Plan seeks to balance the need for homes (both market and affordable) and jobs over the Plan period.
		Hertfordshire County Council is currently in the process of updating its Rail Strategy, which will influence how train services can adapt to growing demand.
2.5	Many residents in East Herts are in the older age bracket and would be	No amendment to Plan in response to this issue
	happy to downsize their properties, if quality alternative housing was available. An area of low rise, easily maintained, energy efficient properties should be considered in the housing plan. Family size homes would then become available within the current town boundaries.	The East Herts Housing Needs Survey (2014) addresses localised housing needs within the district. One of its key recommendations is that future delivery strategies should be closely linked to meeting the growth in older people and enabling a better flow of the existing stock. This will be reflected in the policies contained within Chapter 13: Housing.
2.6	There needs to be a balance of 1-6 bedroom houses for the growing	No amendment to Plan in response to this issue
	diverse population. Bungalows also should be considered for older population so that family properties can become available.	The Strategic Housing Market Assessment (SHMA) identifies the mix/size/tenure of homes required within the district. This will be reflected in the policies contained within Chapter 13: Housing.
		The East Herts Housing Needs Survey (2014) addresses more localised housing needs. One of its key recommendations is that future delivery strategies should be closely linked to meeting the growth in older people and enabling a better flow of the existing stock. Again, this will be reflected in the policies contained within Chapter 13: Housing.
2.7	Where is the water for these developments going to come from?	No amendment to Plan in response to this issue
		The Council has engaged with the relevant water providers throughout the Plan making process in order to ensure that the proposed level and location of

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		growth can be accommodated. A county wide water study, led by Hertfordshire County Council, is also being prepared which will identify any issues with regards to water supply and drainage.
2.8	The increase in demand of housing will put stress on all infrastructures e.g. Schools, roads, rail, utilities, broadband. Infrastructure particularly sustainable transport should be provided in parallel with development.	No amendment to Plan in response to this issue An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. The District Plan includes policies that seek to encourage sustainable travel, including walking and cycling. This will also help mitigate the impact of new housing developments.
2.9	Creation of more hard standing areas will lead to more flooding.	No amendment to Plan in response to this issue Development will need to include sustainable drainage measures in accordance with the Council's Strategic Flood Risk Assessment which will decrease the risk of flooding rather than exacerbate it.
2.10	Energy generation could be assisted by the provision of grants for	In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage. No amendment to Plan in response to this issue
	households to install small scale local energy generators.	This is not a planning matter and cannot be taken into account in the plan making process.
2.11	There is no detail in the document on improving broadband provision. There needs to be work with infrastructure providers. Where is the evidence of this work?	No amendment to Plan in response to this issue Broadband provision is addressed in Chapter 14: Economy (Section 14.4: Communications Infrastructure and Flexible Working Practices). An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.
2.12	Before any plan to increase population in Ware is implemented, improvements to the road network must take place.	No amendment to Plan in response to this issue Noted. While the scale of development should be sufficient to provide the critical mass needed to ensure the provision of necessary infrastructure,

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2.13	Bishop's Stortford Civic Federation state that the visions and objectives are worthy, however they are expressed in such generality. Many plans could be compliant with these general visions and objectives.	services and facilities, it is important that the development should complement the existing character of the town. This issue is further covered under the Issues Report for Chapter 9: Ware. No amendment to Plan in response to this issue The vision is specific to East Herts and has been developed through public
	codid be compliant with these general visions and objectives.	consultation. The objectives are the stepping stones to deliver the vision and form the basis of the policies contained in the District Plan.
2.14	The topic policy aims of the "Natural Environment" and "Landscape" sections state "protecting and enhancing of biodiversity assets" and "conserving and enhancing valued landscapes". If these aims are to mean anything for Ware then the High Oak fields must be retained and incorporated in any future development.	No amendment to Plan in response to this issue This issue is covered under the Issues Report for Chapter 9: Ware.
2.15	Hertford Civic Society states that the solution of bolting on new areas of housing to existing towns cannot continue without leading to the coalescence of the towns. More radical solutions are required.	No amendment to Plan in response to this issue Noted. It is agreed that for the next Plan-period new settlement options, for example, will need to be considered to ensure that development in the future is sustainable.
2.16	Hertford Civic Society state that the plan should involve a mechanism for preventing major developments proceeding until adequate infrastructure is supplied.	No amendment to Plan in response to this issue An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.
2.17	Hertford Civic Society state that the draft Plan is housing focussed, not enough consideration has been given to employment, transport and retention of natural environment.	Not agreed. The Plan considers all of these matters and should be read as a whole. There are individual Chapters on Employment (Economy: Chapter 14), Transport (Transport: Chapter 17) and Natural Environment (Natural Environment: Chapter 19).

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2.18	There is no reference to providing additional places of religious worship.	No amendment to Plan in response to this issue The Plan clearly recognises that places of worship are community facilities. As such Policy CFLR7 and new Policy CFLR8 supports the diversity of faith communities by requiring the provision of adequate and appropriately located facilities in conjunction with new development, as well as protecting existing
2.19	East Herts should incorporate more Eco builds into the District Plan.	No amendment to Plan in response to this issue
		A self-build policy will be included within Chapter 13: Housing which will allow for further opportunities and encourage innovative design in East Herts.
Description	on of East Herts	
2.20	Herts & Middlesex Wildlife Trust would recommend that the Council identifies the district's chalk streams in 2.2.7. These streams are particularly rare.	Proposed amendment to Plan in response to this issue Agreed, amended information will be included in the revised Chapter.
2.21	With regards to 2.2.7 Herts & Middlesex Wildlife Trust states that there are not 14 Local Nature Reserves in East Herts. There are 14 HMWT nature reserves, 1 of which is an LNR and another 7 of which are SSSIs. There are a total of 14 SSSIs in East Herts.	Proposed amendment to Plan in response to this issue Agreed, amended information will be included in the revised Chapter. Updated information has also been included in Chapter 19: Natural Environment.
Key issue	s and challenges	
2.22	2.3.2 is supported, this must ensure that constraints, such as visual impact resulting from topography are factored in to selecting the appropriate land for development.	No amendment to Plan in response to this issue Support and comments noted.
2.23	Disagreement with the sentiment of 2.3.3. Assessment of future needs must be based on robust evidence.	No amendment to Plan in response to this issue The assessment of future needs is based on robust evidence.
2.24	2.3.3 is supported, however creating a vibrant economy for Hertford means tackling congestion on the A414 and introducing a pay on exit parking scheme to rival Welwyn Garden City's.	No amendment to Plan in response to this issue The constraints of the A414 are well known and 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

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		should be noted that HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit and the A414 through Hertford is a key issue for consideration through this process.
		Pay on exit parking is not a planning matter and cannot be taken into account in the plan making process.
2.25	Hertfordshire Ecology supports the protection of high quality	No amendment to Plan in response to this issue
	environment and biodiversity. However, equally important is the management of these. In this respect, the issues noted in paragraph 2.3.3 (rural economy) are acknowledged but the connection between the issues and the management needs to be understood and reflected in the plan. This may be achieved by developing a local food economy with traditional means of production and land management.	Land management is beyond the scope of the District Plan in terms of agricultural activity. Revised Chapter 14: Economic Development however includes an updated section on the rural economy and now refers to supporting the principle of local food production.
2.26	Paragraph 2.3.4 should recognise that East Herts needs more housing	No amendment to Plan in response to this issue
	of all types, not just the specialist housing that is currently noted. There is a need for more open market housing.	Paragraph 2.3.4 is a summary of the key issues.
		The Strategic Housing Market Assessment (SHMA) identifies the districts housing need including the mix/size/tenure of homes required. This is reflected in the policies contained within Chapter 13: Housing.
2.27	Paragraph 2.3.4 should note that housing policy in areas of	No amendment to Plan in response to this issue
	environmental constraints/green belt must make best use of land in terms of density. This may require a change from surrounding development patterns.	Noted. A policy on density is contained within Chapter 13: Housing.
2.28	Thames Water suggests amending 2.3.5 to read "water, wastewater	Proposed amendment to Plan in response to this issue
	and energy".	Agreed, amended information will be included in the revised Chapter.
2.29	Support for 2.3.6, however, for this to be reality improvement in bus timetables is required.	No amendment to Plan in response to this issue
		Support noted and welcomed. Whilst the policies contained in the emerging District Plan aim to facilitate a step change away from car usage, most buses in Hertfordshire are run commercially by bus companies and as such the Council does not have any influence over bus timetabling. For those services

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		that are subsidised by the County Council, that authority has responsibility for determining what form that should take.
2.30	With regards to 2.3.10 Thames Water comments that transmission and treatment of wastewater is a cross boundary issue that needs consideration.	No amendment to Plan in response to this issue Noted. The Council has engaged with the relevant water providers throughout the Plan making process in order to ensure that the proposed level and location of growth can be accommodated. This includes consideration of cross-boundary issues.
2.31	With regards to 2.3.10 HCC state that it is unclear what discussions have taken place with neighbouring authorities under the duty to cooperate.	No amendment to Plan in response to this issue 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.
Vision/Ea	st Herts in 2031	
2.32	The vision depicted seems to be far too idealistic.	No amendment to Plan in response to this issue The NPPF expects local plans to be aspirational but realistic and the vision seeks to address this difficult balance. The vision is specific to East Herts has been developed through public consultation.
2.33	Hertford Civic Society state that the Draft Plan lacks strategic thinking and consideration of what will happen after 2031.	No amendment to Plan in response to this issue Whilst generally local plans are required to have a 15 year time frame (NPPF, paragraph 157), the revised Chapter will include the wider vision for the London Stansted Cambridge Corridor (LSCC) which looks further ahead to 2050.
2.34	Stevenage Borough Council state that the vision should consider how the District Plan can contribute to the viability and development needs of settlements outside of the East Herts boundary (Stevenage, WGC and Harlow). This is relevant to point 6.	No amendment to Plan in response to this issue The vision is a specific statement of what East Herts will be like in the future. However, the Council will continue to work closely with all neighbouring authorities under the Duty to Co-operate.

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2.35	The word sustainable is used frequently in this section; however there is no awareness of any renewable energy schemes or harvesting of flood water.	No amendment to Plan in response to this issue Point 11 of the Vision refers to measures having been taken to adapt to the effects of climate change.
2.36	The statement at 2.4.1 is unrealistic. It should be amended to say that the vision is an aim for how you would like East Herts to be by 2031.	Proposed amendment to Plan in response to this issue Agreed, amended wording will be included in the revised Chapter.
2.37	English Heritage welcomes reference to the district's rich environment; however this vision should extend into the future beyond 2031.	No amendment to Plan in response to this issue Whilst generally local plans are required to have a 15 year time frame (NPPF, paragraph 157), the revised Chapter will include the wider vision for the London Stansted Cambridge Corridor (LSCC) which looks further ahead to 2050.
2.38	The Lee Valley Regional Park Authority suggest an additional bullet or addition to current bullet reading "The Districts rich and varied green infrastructure centred on the river valleys will be re-connected and enhanced and its multi-functionality protected providing increased resilience to changing climates, improved ecological connectivity and new spaces for recreation and leisure".	Proposed amendment to Plan in response to this issue Agreed, amended wording (or similar) will be included in the revised Chapter.
2.39	Hertford Civic Society question point 1, as they state that the high quality environment is already deteriorating seriously. The plan offers no solution for congestion in Hertford that is already present.	No amendment to Plan in response to this issue East Herts continues to benefit from a high quality environment. The District Plan seeks to manage the challenges presented by high levels of growth by protecting what is most important and ensuring that where development does take place, it is of a high quality design that takes account of its local setting.
		The constraints of A414 through Hertford are well known and 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 in the Plan. 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 and the A414 through Hertford is a key issue for consideration through this process

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2.40	Hertfordshire Ecology welcomes point 1. However, this cannot be achieved without maintaining the land management processes that keep it that way. This should be recognised.	No amendment to Plan in response to this issue Support for point 1 is welcomed. Land management is however beyond the scope of the District Plan in terms of agricultural activity.
2.41	With regards to point 3, concerns are raised that "lifetime homes" do not take into account space and privacy required for families of today, as well as adequate provision for parking.	No amendment to Plan in response to this issue Reference to Lifetime Homes will be 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. Vehicle parking standards have been reviewed as part of ongoing work on the District Plan.
2.42	Point 6 is supported. However, as it stands there is no reference to protection of town centres.	No amendment to Plan in response to this issue Support noted and welcomed. It is considered that town centres are appropriately referred to under point 6.
2.43	HCC recommend the following addition to point 7: "Where new development could potentially have an adverse effect on the historic environment, measures will have been taken to ensure that the impact was either avoided or mitigated".	No amendment to Plan in response to this issue Revised Policy HA1: Designated Heritage Assets sets out the Council's approach to the positive enhancement and management of heritage assets. In line with the NPPF, development proposals that would harm such assets will not be permitted unless benefits outweigh the harm.
2.44	Hertfordshire Ecology suggest the following addition to point 9: "Where new development could potentially have an adverse effect on biodiversity, measures will have been taken to ensure that the impact was avoided, mitigated or compensated'.	No amendment to Plan in response to this issue Revised Policy NE1: International, National and Locally Designated Nature Conservation Sites and New Policy NE2: Site of Nature Conservation Interest (Non-Designated) set out that proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation.
2.45	Herts & Middlesex Wildlife Trust welcome point 9, however suggest amending the wording to read "adverse effect on biodiversity and the ecological network of the district, measures".	Proposed amendment to Plan in response to this issue Agreed, amended wording will be included in the revised Chapter.

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2.46	The environment and engineering team stress the importance of points 9, 10 and 11. Implementation of principles in the SFRA can help these points to be achieved.	No amendment to Plan in response to this issue Noted.
2.47	Environment Agency support points 9, 10 and 11. It is suggested to make point 9 stronger "where possible" should be removed from the first sentence.	Proposed amendment to Plan in response to this issue Agreed, amended wording will be included in the revised Chapter.
2.48	Natural England suggests that point 10 and 11 should recognise the role that green infrastructure has to play in mitigating the effects of climate change.	Proposed amendment to Plan in response to this issue Agreed, amended wording will be included in the revised Chapter.
2.49	Points 10 and 11 are admirable, however Hertfordshire's public transport is so poor the District is reliant upon car transport. The proposed developments will only add to high levels of pollution.	No amendment to Plan in response to this issue The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's disbursed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage, where sustainable travel choices exist. More detail on sustainable transport initiatives is provided by Policy TRA1: Sustainable Transport. Policy EQ4: Air Quality provides criteria that development proposals should comply with to help mitigate the effects of emissions.
Strategic	Objectives	
2.50	Stevenage Borough Council state that the objectives should recognise that multiple housing markets exist within East Herts. The objectives should reflect the potential for negotiating across administrative boundaries to ensure needs are met across the market area.	No amendment to Plan in response to this issue The strategic objectives are the stepping stones to deliver the vision for East Herts. The Council is working closely with its partners in the wider Housing Market Area, and with other neighbouring authorities, to ensure that its housing needs are met across the area.
2.51	There should be a statement that recognises the need to provide food security. Agricultural farmland is of vital importance.	No amendment to Plan in response to this issue Food security is a wider issue than just East Herts. Revised Chapter 14: Economic Development includes an updated section on

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		the rural economy and now refers to supporting the principle of local food production.
2.52	Environment Agency supports objectives 1, 8 and 9.	No amendment to Plan in response to this issue
		Support noted and welcomed.
2.53	The environment and engineering team stress the importance of	No amendment to Plan in response to this issue
	objectives 1, 6 and 8.	Noted.
2.54	The principles of sustainable construction contained in the SFRA would	Proposed amendment to Plan in response to this issue
	encourage the creation of green infrastructure. Green infrastructure would contribute to climate change mitigation.	Noted. Amended wording will be included in the revised Chapter to recognise the role that green infrastructure has to play in mitigating the effects of climate change.
2.55	HCC suggest an additional statement in objective 4 relating to the	Proposed amendment to Plan in response to this issue
	protection and enhancement of the historic environment.	Agreed, amended wording will be included in the revised Chapter.
2.56	English Heritage welcomes the reference to historic character in	Proposed amendment to Plan in response to this issue
	objective 4. This objective could be strengthened by rewording to: "protect and enhance the historic environment of East Herts, promoting good design that creates a distinctive sense of place"	Agreed, amended wording will be included in the revised Chapter.
2.57	Sport England supports objective 7.	No amendment to Plan in response to this issue
		Support noted and welcomed.
2.58	The strategic objectives are admirable, however how are Group 2	No amendment to Plan in response to this issue
	villages to benefit from new facilities for the "arts, culture, community, leisure, entertainment, recreation, faith and health" or from "networks of green space".	The policy approach in the District Plan does allow for appropriate new leisure, recreation and community facilities in Group 2 Villages.
2.59	Herts & Middlesex Wildlife Trust welcomes objective 8. However, it is	Proposed amendment to Plan in response to this issue
	recommended to re-word to: "networks of high quality green space for both recreation and wildlife".	Agreed, amended wording will be included in the revised Chapter.

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2.60	Natural England welcomes objective 8. However, they suggest that the sentence reads as though these are the only methods to be used for protecting biodiversity. A more open sentence which identifies the creation of greenspace as just one tool for protecting/enhancing biodiversity may provide greater flexibility.	Proposed amendment to Plan in response to this issue Agreed, amended wording will be included in the revised Chapter.
2.61	Hertfordshire Ecology support objective 8. However, this does not include securing or supporting the land management practices that will deliver the vision. Nowhere is any mention of local food or fuel products which have sustained the countryside's character through agriculture or forestry operations. Recognition of this is essential.	No amendment to Plan in response to this issue Land management is beyond the scope of the District Plan in terms of agricultural activity. Revised Chapter 14: Economic Development however includes an updated section on the rural economy and now refers to supporting the principle of local food production.
2.62	The Lee Valley Regional Park Authority suggests amending objective 9 to read: "with provision of the necessary infrastructure, including enhancement and provision of green infrastructure."	Proposed amendment to Plan in response to this issue Agreed, amended wording will be included in the revised Chapter.
2.63	Thames Water support objective 9.	No amendment to Plan in response to this issue Support noted and welcomed. Objective 9 will be amended to also refer to the enhancement and provision of green infrastructure.
2.64	It would be useful if the plan could include any relevant work that has been undertaken to determine what infrastructure improvements are needed to ensure the deliverability of housing. The Council must make sure an IDP is produced.	No amendment to Plan in response to this issue An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. Further information on the deliverability and viability of the draft proposals in the Plan can be found in the Delivery Study (September 2015).
2.65	How will the council seek funding for infrastructure, would it be through Section 106 payments or through the new Community Infrastructure Levy (CIL)?	No amendment to Plan in response to this issue The Council has not yet made a final decision on whether to adopt a Community Infrastructure Levy (CIL). In the meantime contributions will continue to be sought under Section 106.