

Issue Number	Issues raised through consultation	Officer Response
<b>General Issues</b>		
3.01	Parish Councils, community groups and others stress opposition to development on green belt land. Development should be directed to the two-thirds of the District that is not green belt. EHC have not portrayed the exceptional circumstances required for green belt release. Brownfield sites and windfall should be used. Planners need to say when it is not possible to reach the government requirements.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs. 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>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.</p>
3.02	A number of local people including Town and Parish Councils and Civic Societies expressed concerns that the level of housing proposed is too high. The figures of 15,000 (total) and 750 (per year) should be reduced. Justifications for these totals are contrary to national policy. NPPF says that LPAs must “seek” to meet housing targets, to the extent other policies allow.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. The 2014 based household projections were published by the Government on 12<sup>th</sup> July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p> <p>The Council has always sought to prepare a Plan which meets the full objectively assessed housing needs of the District. Unless there is clear justification for doing so, submitting a Plan that does not meet full objectively assessed needs is highly likely to be found ‘unsound’ at Examination.</p> <p>Only the lower third of the District is within the Green Belt. 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</p>

		north of the District which is not considered to be a sustainable approach.
3.03	A number of landowners, developers and planning agents expressed concerns that the housing target of 15,000 is too low, taking account of the requirements of the NPPF and requirements of the Planning Inspectorate at the examination of Local Plans. EHC cannot demonstrate a 5 year housing supply. Some have suggested figures should be altered to 16,900, with 845 dwellings to be built per year. A green belt review may be required.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. The 2014 based household projections were published by the Government on 12<sup>th</sup> July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p> <p>It is acknowledged that in order to meet this challenging level of housing need, some carefully planned development on existing Green Belt land will be required.</p>
3.04	A number of landowners, developers and planning agents suggest that EHC should take account of the under-provision of homes in London, as all south-east authorities have been advised by the Greater London Authority (GLA).	<p><b>No amendment to Plan in response to this issue</b></p> <p>The SHMA includes assumptions regarding internal migration from London to the four authority areas that comprise the East Herts/West Essex housing market area. However, it does not seek to provide for any under-supply in housing within London.</p> <p>The Greater London Authority is currently in the early stages of a full review of the London Plan which will identify how their housing need will be met. If there continues to be an under-supply of housing in London it is not clear at this stage how this would be addressed within the wider south east region. It is therefore not an issue which can be considered through the emerging East Herts District Plan.</p>
3.05	Great Amwell Parish Council support the approach outlined in the plan. However, they would not wish to see any development that has an adverse impact on any adjoining area or areas within the District.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan seeks to provide for the full objectively assessed needs of East Herts in a sustainable manner. The strategic importance of the Green Belt in the area of Great Amwell is noted, given that it performs a vital role in preventing the coalescence of various settlements including Great Amwell, Ware, Stanstead Abbots and St. Margaret's and Hoddesdon.</p>
3.06	North Herts District Council considers that East Herts Council should consider the potential long-term unmet needs arising	<p><b>No amendment to Plan in response to this issue</b></p>

	from Stevenage, and options within East Herts to address these unmet needs. North Herts may not be in a position to accommodate all the development associated with those needs.	The Council has liaised regularly with Stevenage Borough Council throughout the plan making process as part of the Duty to Co-operate. Stevenage Council recently published a Pre-Submission version of their Local Plan which seeks to meet their objectively assessed housing needs in full.
3.07	The plan fails to take account the effect the proposals would have on farmland. NPPF states that agricultural land should be protected. The UK still has to produce its own food.	<b>No amendment to Plan in response to this issue</b>  The NPPF does encourage local planning authorities to avoid development of good quality agricultural land wherever possible. However, much of the agricultural land in East Hertfordshire is regarded as being of high quality. It would therefore not be possible for the District to meet its substantial level of housing need without some carefully planned development on higher quality land.
3.08	Continual development will increase the risk of flooding.	<b>No amendment to Plan in response to this issue</b>  New developments 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.  In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.
3.09	What type of housing will be built? Will the housing be built for people working in London or will there be housing available for young people to rent? There does not seem to be provision for self-build homes.	<b>No amendment to Plan in response to this issue</b>  New development in East Herts will provide for a mix of housing to help meet different needs in accordance with District Plan Policy HOU1. This includes provision for affordable housing, including starter homes, and self-build housing.
3.10	Natural England state that all development locations should “provide quality green infrastructure through the site including opportunities for preserving and enhancing on-site assets, maximising opportunities to link existing assets and enhance biodiversity”.	<b>No amendment to Plan in response to this issue</b>  Noted and agreed. The District Plan requires sites to deliver green space and green infrastructure. The level of provision is a detailed issue which will be addressed at the planning application stage.
3.11	HCC comments that the timing/phasing of sites needs to take into account provision of infrastructure, in particular school places. School accommodation needs to be phased with proposed housing to avoid difficulties in providing school places.	<b>No amendment to Plan in response to this issue</b>  Noted. The Council has worked closely with the County Council throughout the plan making process, including the education team, in order to ensure that infrastructure is delivered and phased appropriately. Requirements for new or expanded schools are identified within the Infrastructure Delivery Plan (IDP).

3.12	Dislike the NPPF. There is a conflict between the NPPF and the Localism Act. The NPPF acts as national guidance which LPAs should measure their planning performance, whilst the Localism Act looks to give powers to local people, this is contradictory. Elected Members should take a stand against unsustainable development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Legally, East Herts must produce a District Plan which is in conformity with national policy. This test will form part of the Examination in Public in due course in order to ensure that the Plan is ‘sound’ and therefore fit for purpose.</p>
3.13	Landowners, developers and planning agents believe that there is not enough consideration of cross boundary issues. East Herts need to abide by the “Duty to cooperate” and demonstrate engagement with neighbouring authorities. It would be useful if the plan provided details on what cross boundary issues have shaped the plan. There is no evidence of co-operation with Welwyn and Hatfield Borough Council (East of WGC) and Harlow Council (Gilston). Housing targets may need to be re-assessed taking into account unmet needs of neighbouring authorities.	<p><b>No amendment to Plan in response to this issue</b></p> <p>East Herts Council is part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area (comprising East Herts, Epping Forest, Harlow and Uttlesford Councils). Three separate Memoranda of Understanding are currently being prepared which will demonstrate that all relevant authorities are in agreement on strategic issues including the distribution of housing need across the housing market area, the provision of strategic transport infrastructure, and the protection of Epping Forest Special Area of Conservation.</p> <p>East Herts has also pro-actively engaged with other neighbouring authorities on strategic issues. The Council will also seek to agree Memoranda of Understanding with these authorities before submitting the District Plan to the Planning Inspectorate in March 2017.</p>
3.14	Local Plans should provide certainty to investors, developers and the public about where and what development will take place. This is not carried through the District Plan.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The emerging District Plan proposes allocating a number of sites in order to meet the challenging level of housing need within the District. The proposed locations for development are clearly identified on the Policies Map which accompanies the Plan.</p>
3.15	Development in Buntingford is artificially restricted for political reasons and this is inadequate. EHC has not given consideration to non-green belt allocations in settlements such as Buntingford. These sites offer the chance to reduce impact on green belt. Land south of Hare Street Road should be allocated.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan Preferred Options document proposed allocating land to the north and south of the town for a total of 480 new homes. These sites have subsequently received planning permission.</p> <p>Planning permission for land south of Hare Street Road has also been granted on appeal, along with other sites on the edge of Buntingford.</p>

3.16	The Draft District Plan fails to make adequate proposals to safeguard the market-town, rural nature of the District.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan seeks to provide for the challenging level of housing need in a way that protects the character of the District as far as possible. A significant proportion of new development will take place in areas outside of the District's towns including the Gilston Area, East of Stevenage and East of Welwyn Garden City.</p>
3.17	Development should be directed to locations where people are not able to use the countryside for enjoyment. Areas with no footpaths or bridleways would be appropriate. An example of this could be land between the village of Westmill and the A10.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The impact of development on public rights of way has been considered through the plan making process. However, given its relative isolation and lack of services, Westmill is not considered to be a sustainable location for significant new development.</p>
3.18	Widbury Residents Association comments that the only way to protect any proposal is too compulsorily purchase the land required at current market value. Otherwise EHC will be agreeing to compromises with developers.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The UK planning system allows for an uplift in land value to reflect proposed uses. It is noted that this often leads to significant profits for landowners and effectively reduces the amount of money that can be spent on infrastructure, however this is not an issue that the District Plan can resolve.</p>
3.19	More consideration needs to be given to the cumulative impact. Development should be shifted to the North of England or derelict areas in London.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The cumulative impact of development, including areas outside of East Herts, is an important principle of plan making and has been considered in a number of ways. In particular, the Council has worked with Essex and Hertfordshire County Councils in order to undertake transport modelling which identifies where mitigation measures are required to help facilitate growth across the wider sub-region.</p> <p>National planning policy is clear that local planning authorities must seek to plan for their full objectively assessed needs.</p>
3.20	Brownfield sites within the towns should not only be developed for mixed-use schemes. Some of these sites can make greater contribution to housing needs.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is considered important, where town centre or edge of centre brownfield sites are available for re-development, that they provide a mix of uses, including employment, in order to support the needs of current and future residents.</p>

3.21	McMullen & Sons limited would like to see a District Plan that facilitates the long term development of pubs, particularly those in the rural area. Many of the pubs will require growth and adaptation to cater for developments proposed (convert to food-led operations). Support is portrayed for many of the residential developments.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Draft policy CFLR7 allows for limited extensions and alterations to community facilities where doing so would not conflict with other policies in the Plan.</p>
3.22	Environment Agency supports the use of brownfield sites.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. Given the rural nature of East Herts there are very few brownfield sites that are available for re-development. However, the District Plan does seek to bring such sites forward for development, including the Goods Yard in Bishop’s Stortford and the Mead Lane area of Hertford.</p>
3.23	Bishop’s Stortford Civic Federation and others believe that development should be directed to villages, in particular the better served ones. This could decrease the pressure on the urban areas/urbanised corridors.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The level of housing need in the District is significant. In order to meet this requirement, a number of sites are proposed for allocation across the District, including on the edge of larger settlements such as Harlow, Welwyn Garden City and Stevenage. In addition, the Plan seeks to deliver a limited amount of development in village locations, to be delivered primarily through the preparation of Neighbourhood Plans.</p>
3.24	It is logical to prioritise developed land and greenfield sites first and then bring forward broad locations after DPDs have been adopted.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is now the view of Officers that the three sites that were previously identified as Broad Locations within the Preferred Options version of the District Plan should be allocated. There would therefore not be a need to prepare future DPDs.</p>
3.25	There seems to be no consideration of Aston and the area adjacent to Stevenage in the Plan.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Supporting Document, which informed the District Plan Preferred Options document, did consider the potential for strategic scale development to the east of Stevenage. It was discounted at that stage, largely on the basis that development of that scale would have a significant negative impact on the environment of the Beane Valley.</p> <p>Given the challenging level of housing need, and in particular a need to ensure sufficient housing is delivered within the first five years of the plan period, further</p>

		consideration has been given to a smaller scale of development in that location. As a result, it is now the view of Officers that a site to the east of the town should be allocated for approximately 600 homes and a primary school.
3.26	Thames Water comments that water/wastewater infrastructure is easier provided for a small number of large sites as opposed to a larger number of small sites.	<b>No amendment to Plan in response to this issue</b>  Noted. The District Plan proposes the allocation of a number of large sites in order to help provide for the challenging level of housing need in the District. This strategy helps to ensure that the provision of new infrastructure can be maximised.
3.27	Uttlesford District Council has no specific objections to any of the sites or policies proposed, but does have concerns regarding the cumulative impact on <ul style="list-style-type: none"> <li>1) London Stansted Airport in terms of overflying the area and also in terms of its transport impact on the M11 and rail network and potential future growth.</li> <li>2) Joint impact on the A120 and M11 junctions.</li> <li>3) Cross border movements of pupils for primary and secondary education.</li> <li>4) Joint impact on the Bishop’s Stortford Waste Water Treatment Works (within Uttlesford) and outfall to the River Stort.</li> </ul> <p>It is therefore proposed to continue to work closely together to address these issues.</p>	<b>No amendment to Plan in response to this issue</b>  Both authorities are part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area. These issues have been addressed through this forum.  In particular, a Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth. Hertfordshire and Essex County Councils have also been engaged on education matters, while Thames Water is satisfied that waste water infrastructure has sufficient capacity to cope with the level of growth envisaged across the wider area.
<b>Introduction</b>		
3.28	Growth on any scale is not sustainable, the councils references to sustainability in the Introduction is very muddled. The council should make it clear that it will follow the government’s growth agenda only because it is legally bound to, not because it is the wish of the people of East Herts.	<b>No amendment to Plan in response to this issue</b>  The Council is legally required to seek to meet its full objectively assessed housing needs. However, development can bring significant benefits, for example, through the provision of affordable housing, jobs, new services and facilities and green space.
<b>Policy DPS1: Housing, Employment and Retail Growth</b>		

3.29	Paragraph 3.2.3 should be amended to reflect that infrastructure capacities do not limit growth. 3.2.3 seems to contradict paragraph 3.3.4.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is not agreed that there is a contradiction between the two paragraphs. The Council is required to seek to meet its objectively assessed housing needs. However, in formulating the development strategy, regard must be had to infrastructure capacity in order to ensure that services and facilities can cater for anticipated levels of growth.</p>
3.30	The projections utilised in paragraph 3.2.4, should be challenged as projections simply assume the continuation of what has gone before. There is no logical reason why it should be assumed that growth will continue at the same rate.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The methodology for assessing housing need is in accordance with national guidelines.</p>
3.31	Object to 3.2.7 as there are plenty of industrial/warehouse locations with long term “for sale or to let” signs present. There is no need to secure additional greenfield sites.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs.</p> <p>It is also a priority for the Council to maintain sites that are currently in employment use wherever possible unless it can be demonstrated that such uses are now longer required or viable.</p>
3.32	A number of landowners, developers and planning agents object to 3.2.10 and state that East Herts must use up to date market analysis to assess employment sites. Simply retaining all previous employment sites fails to take into account changing circumstances. All employment areas and other safeguards to development should be reviewed.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has up to date evidence which confirms that all sites currently in employment use should be retained.</p>
3.33	“District centres” are proposed within urban extensions as opposed to neighbourhood centres/parades that are stated in 3.2.15.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Neighbourhood centres and local parades will be provided as part of larger developments in order to serve local communities without competing with services and facilities within town centres.</p>



<p>3.34</p>	<p>The Bishop’s Stortford Civic Federation states that it is not in a position to challenge the 15,000 additional homes. However since half the District’s population growth in the recent past has resulted from net inward migration and this is supposedly part of the housing ‘need’ to be met, we suggest that the Council look again at that element of population projection and how it might vary according to the choice of baseline from which to project the trend and how it might be modified by altering the future distribution of housing compared to the past.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. The methodology for assessing housing need is in accordance with national guidelines.</p> <p>The 2014 based household projections were published by the Government on 12<sup>th</sup> July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p> <p>Policy DPS1 needs to be updated to reflect the SHMA figure.</p>
<p>3.35</p>	<p>It is highly unlikely that 30% or 40% affordable housing will be achievable and therefore the only mechanism to properly address affordability will be to increase the supply of housing.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Not agreed. The Delivery Study, which forms part of the Council’s evidence base, concluded that it is financially viable to provide 30 – 40% affordable housing for the majority of housing site typologies.</p>
<p>3.36</p>	<p>Welwyn Hatfield Borough Council is concerned that in deriving the District Plan’s housing target, EHDC does not appear to have taken into account provision for all the housing market areas covered by East Hertfordshire. Welwyn Hatfield Council objects policy to DPS1 as it makes no allowance for any unmet need arising in Welwyn and Hatfield.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Since the Preferred Options consultation, Strategic Housing Market Assessments (SHMA’s) covering the relevant Housing Market Areas (HMA’s) have been completed. There is a degree of overlap between the various HMAs and regard should be had to needs arising in all neighbouring areas. However, Welwyn Hatfield Council has not asked East Herts for assistance in meeting its housing needs.</p>
<p>3.37</p>	<p>In recent years the demand for housing has outstripped the supply. The outcome of this has been a significant increase in housing prices.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. The undersupply of housing provided in East Herts in recent years has been taken into account in identifying the objectively assessed housing need figure for the District. In addition, as there has been a consistent undersupply, a 20% buffer has been added to the housing target in the first 5 years, which has been brought forward from later in the plan period in accordance with national policy.</p>

3.38	It is essential that additional retail floorspace is delivered in the town centres e.g. Hertford. This should be done by positive plan allocations.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Councils evidence base indicates that there is a relatively modest need for new comparison and convenience floorspace in the District. The District Plan does not seek to allocate sites for new retail space. However, the policies contained in the plan are sufficiently flexible to allow the provision of additional provision in appropriate locations. In respect of Hertford, this issue has been addressed by the Town Centre Urban Design Strategy.</p>
3.39	CPRE Hertfordshire and others raised concerns that the housing target of 15,000 was attained by utilising the 2013 interim household projections. It is highlighted that these figures are considered projections rather than forecasts, therefore the robustness is questioned. This data source is also out-dated; so the housing target should be reviewed.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033.</p> <p>The 2014 based household projections were published by the Government on 12<sup>th</sup> July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p>
3.40	CPRE Hertfordshire suggests that the windfall figures in the draft are far too low. Changes to permitted development rules mean these figures are out of touch. Under the new regulations farm buildings and office premises can be converted to flats/houses without planning permission. This is a form of windfall growth which could reduce the reliance on Greenfield sites.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The windfall figures included within the Development Strategy have been based on recent trends. The Council must positively plan for the housing need in the District and it is highly unlikely that relying on windfall for a significant part of that need would be considered a ‘sound’ approach at Examination.</p>
3.41	Various respondents question how 9,700 jobs will be delivered in East Herts, while a number of others are concerned that 9,700 is too low. 2013 EEFM projections suggest a need for 11,200 jobs.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>In order to create sustainable communities it is important to provide sufficient jobs alongside significant housing growth. The Economic Development Chapter contains policies that seek to support the delivery of new employment space. However, it is recognised that the figure of 9,700 jobs as identified by Policy DPS1 is out of date and will need to be updated to reflect the most recent evidence.</p>

Policy DPS2: The Development Strategy 2011 - 2031		
3.42	The guiding principles are too general for an area so diverse in character.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is acknowledged that East Herts is a large, diverse District. However, it is considered that the ten guiding principles have provided a sound basis on which to prepare the District Plan.</p>
3.43	There is no mention of education in the guiding principles.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The guiding principles relate to the spatial strategy specifically. Education capacity is important and is addressed in other parts of the plan as well as the Infrastructure Delivery Plan.</p>
3.44	An additional guiding principle should be added seeking high quality design and conservation of heritage assets.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The guiding principles relate to the spatial strategy specifically. Whilst high quality design and conservation are important, they are addressed elsewhere in the plan.</p>
3.45	Insert additional guiding principle to protect the green belt and to ensure that its boundaries are altered only in exceptional circumstances.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Principle 9 is “To protect and enhance the rural area and the Green Belt outside the allocated development areas to preserve the countryside and the rural character of the District.”</p>
3.46	Bishop’s Stortford Civic Federation and others suggest that Principle 1 should be modified to emphasize that the first priority ought to be to meet the naturally arising demand in each settlement (rather than the housing market area) and that catering for inward migration should be a secondary objective – not part of the primary housing requirement, since the plan itself can influence how and where such secondary demand is met.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Work on housing need at the local level was undertaken in order to inform the Preferred Options document. This suggested that the level of need arising from certain locations in the District could not be met in those areas, and therefore, this need could primarily be met by development in the Gilston Area.</p> <p>However, the updated SHMA does not identify need at a level that is smaller than District level – the level of need for East Herts is 16,390 dwellings by 2033. The 2014 based household projections were published by the Government on 12<sup>th</sup> July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need.</p>

		Guiding Principle 1 should be updated to reflect this.
3.47	Principle 3 should be amended to read “.....to services and facilities with identified available capacity or immediate ability to be expanded to meet the growth in demand, and which reflect....”	<p><b>No amendment to Plan in response to this issue</b></p> <p>The guiding principles relate to the spatial strategy specifically. Proximity is important because it encourages use of services and facilities without use of the car, alleviating congestion and supporting place-making. Capacity is also important and is addressed extensively in other parts of the plan, in particular through the Infrastructure Delivery Plan.</p>
3.48	The Bishop’s Stortford Civic Federation believes that Principle 3 is flawed. The plan should be looking ahead to how settlements will evolve in the future and aim for sustainability across the generations. As drafted, this principle simply looks backwards to 20 <sup>th</sup> century patterns of development, as dictated by previous plans for the district.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Self-containment could be achieved through a new settlement, which would be a departure from existing patterns. The Supporting Document, which is available to view on the Councils website, did assess a number of potential locations for a new settlement in East Herts. However, these options were ruled out, either due to sustainability issues, or the fact that they would not be deliverable within the plan period.</p>
3.49	Principle 5 requires much more detail and an imperative for the release of further sites to meet the chronic land supply position within East Herts.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This principle has guided the approach to the three sites that were identified as Broad Locations within the Preferred Options version of the District Plan. Given the evidence that is now in place, it is the view of Officers that all three sites should be identified as allocations within the forthcoming Pre-Submission version. This approach provides greater certainty to all parties regarding the delivery of development in these locations.</p> <p>In addition, the development strategy includes sufficient sites in order to allow the Council to demonstrate a five year supply of land from the date of adoption.</p>
3.50	There is no evidence to suggest that Principle 6 has been achieved.	<p><b>No amendment to Plan in response to this issue</b></p> <p>East Herts Council is part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area (comprising East Herts, Epping Forest, Harlow and Uttlesford Councils). Three separate Memoranda of Understanding are currently being prepared which will demonstrate that all relevant authorities are in agreement on</p>

		<p>strategic issues including the distribution of housing need across the housing market area, the provision of strategic transport infrastructure, and the protection of Epping Forest Special Area of Conservation.</p> <p>East Herts has also pro-actively engaged with other neighbouring authorities on strategic issues. The Council will also seek to agree Memoranda of Understanding with these authorities before submitting the District Plan to the Planning Inspectorate in March 2017.</p>
3.51	HCC Ecology suggests that the word ‘preserve’ (principle 9) should be changed to ‘maintain’, acknowledging that the countryside is not preserved in aspic. Links between development and the countryside should be supported.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Agreed.</p>
3.52	The Bishop’s Stortford Civic Federation suggests that development in villages should be of a sufficient scale to meet the needs of present and future generations in those settlements. The expression of this principle is too restrictive as drafted. Decisions should not be left to local initiatives from Parish Councils as these will ensure development does not happen.	<p>The District Plan does seek to provide a minimum of 500 new dwellings within the most sustainable (Group 1) villages. Primarily, village development will be delivered through Neighbourhood Plans. A number of parishes have already started preparing plans for their areas. The development strategy also allows limited infilling within Group 2 villages.</p> <p>The number of homes being built in village locations will be monitored, and if the minimum target of 500 dwellings is unlikely to be met then this can be addressed through a review of the District Plan.</p>
3.53	Thorley Parish Council believes 3.3.4 should be altered to say that “every effort should be made within the guidelines of government policy”.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is considered that the existing wording accurately reflects national policy.</p>

<p>3.54</p>	<p>A number of landowners, developers and planning agents state that it seems as if EHC accepts that there will be a shortfall in provision of homes in the first five years of the plan period. This is in addition to the shortfall already present in 2011. It is unsound to spread this shortfall across the plan period. Many site promoters argue that NPPG and Planning Inspectorates suggest that the proposed ‘Liverpool’ method of spreading the shortfall over 15 years is incorrect. Some site promoters advocate the ‘Sedgefield’ method to making up any shortfall in the first five years. This will mean that either a) delivery of the larger sites and broad locations should be accelerated and/or b) release of additional sites (potentially from the green belt). Housing requirement in the first five years should be considerably higher.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Strategic Housing Market Assessment (SHMA) has been prepared by independent consultants on behalf of the four local authorities that comprise the housing market area. The SHMA indicates that the objectively assessed housing need in East Herts is for 16,390 new homes up to 2033. Based on this level of need, it is likely that the shortfall from 2011 could be addressed in full within the first 5 years of the plan period.</p> <p>The 2014 based household projections were published by the Government on 12<sup>th</sup> July 2016. The Council is currently working with its housing market area partners in order to understand how this data impacts on the assessment of objectively assessed housing need. If this work results in an increase to the level of need, then it might be necessary to spread the shortfall over the plan period in order to ensure that the Council can demonstrate a five year supply of deliverable sites from the date of adoption.</p>
<p>3.55</p>	<p>Question regarding the definition of larger and smaller sites used in paragraph 3.3.6, there is no justification for why smaller sites are not deliverable within the first five years.</p>	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The paragraph does not state that smaller sites cannot be delivered in the first five years, but that on their own, they cannot meet the level of identified need in the first five years of the plan period. In any case, this paragraph needs to be updated to reflect the revised development strategy and phasing.</p>
<p>3.56</p>	<p>A number of landowners, developers and planning agents believe that the buffer stated in 3.3.7 should be 20% rather than 5%. This is because there has been a persistent under delivery of houses in East Herts. Additional deliverable sites will be required.</p>	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Noted. The Council accepts that a 20% buffer is necessary due to persistent under delivery. This paragraph therefore needs to be updated to reflect this position.</p>
<p>3.57</p>	<p>Further growth should be considered in Buntingford to address the shortfall in housing. The land North of Hare Street Road is land that can come forward.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Planning permission for land north of Hare Street Road has been granted on appeal, along with other sites on the edge of Buntingford.</p>
<p>3.58</p>	<p>The following should be added to Policy DPS2, “In addition to the allocations identified, additional permissions for new housing may be granted where it is demonstrated to the</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>The development strategy will be kept under review in order to monitor the delivery</p>

	Council’s satisfaction that a development proposal will be of benefit in addressing a shortfall in the District’s five year housing supply or delivering the Council’s strategy for a specific settlement (particularly where allocated or permitted sites are failing to come forward as anticipated).”	of allocated sites. However, it is inevitable that planning applications will be received for land that is not identified within the Plan. These will be assessed against the policies in the Plan through the normal development management process.
3.59	Strategy should provide comprehensively planned new settlements rather than piecemeal additions to towns. No justification for why a Garden City/Town/Village has not been considered, rather than risking the disruption to existing residents from site allocations. Widbury Residents Association suggests a new settlement could be created encircling Watton-at-Stone and Stapleford. Whilst, others suggest that Gilston could be developed into a new garden town/city and 10,000 houses could be built in the plan period. This would reduce the pressure on green belt areas.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Supporting Document, which is available to view on the Councils website, did assess a number of potential locations for a new settlement in East Herts. However, these options were ruled out, either due to sustainability issues, or the fact that they would not be deliverable within the plan period.</p> <p>East Herts, Epping Forest and Harlow Councils will be submitting a joint bid to Government for financial and technical assistance in support of a Garden Town covering the wider Harlow area. However, in terms of the Gilston Area, it is unlikely that more than 3,000 homes could be provided in the plan period. This is reflective of build out rates on similar sites elsewhere in the country.</p>
3.60	Hertford Civic Society suggested that instead of Green Belt releases, land beyond the Green Belt should be identified for development, for example Ashwell and Morden Station in North Hertfordshire could be agreed for development using the Duty to Co-Operate. There is also no reason given why development cannot be accommodated at Watton-at-Stone.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Before approaching another authority to take its unmet housing need, all local planning authorities must ensure that they have assessed all the reasonable options, including options which lie within the Green Belt.</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>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.</p> <p>Watton-at-Stone, which lies within the Green Belt, has been identified for a minimum 10% growth in housing stock, amounting to at least 92 dwellings.</p>
3.61	Object the policy as the strategy is reliant on strategic	<b>No amendment to Plan in response to this issue</b>

	allocations (e.g. north and south of Bishop’s Stortford, west of Hertford) coming forward within the early part of the plan period, but there is no certainty or guarantee over their deliverability.	Land to the north of Bishops Stortford now has permission for 2,529 homes, part of which is expected to come forward in the first five years of the plan period. Other sites, including the two west of Hertford, are also expected to deliver housing in the first five years. Prior to submission of the District Plan to the Planning Inspectorate, Statements of Common Ground will be agreed with all site promoters which will, in part, identify when each site should be built out.
3.62	Part IV of Policy DPS2 seeks to phase housing development in the first five years permitting only greenfield/brownfield development on the edges of towns. This restriction of development in villages will result in pent up demand.	<b>No amendment to Plan in response to this issue</b>  Part IV covers development in and around the towns. Part VII identifies that development in the villages will also come forward in accordance with Policy VILL1.
3.63	Policy should be extended to commitment to brownfield sites in the villages, not just the towns.	<b>No amendment to Plan in response to this issue</b>  The District Plan proposes a strategy whereby development in villages will be addressed by Neighbourhood Plans in accordance with Policy VILL1. It is therefore the role of Parish Councils to decide which sites are allocated for development.
3.64	HCC and others are concerned with the strategy for the broad locations. The precise location and the details of development are left until later in the plan period. This means there is uncertainty with regards to dwelling numbers across the district. The planning for infrastructure will have to be dealt with early.	<b>Proposed amendment to Plan in response to this issue</b>  Given the evidence that is now in place, it is the view of Officers that the three areas identified as Broad Locations within the Preferred Options Plan should now be proposed as allocations within the Pre-Submission stage document. Future DPDs will therefore not be required. It is recognised that allocating these sites through the District Plan provides greater certainty to service providers. Policy DPS2 needs to be updated to reflect this change.
3.65	Landowners, developers and planning agents object to Policy DPS2 Part VII as it is reliant on Parish Councils producing Neighbourhood Plans which is an optional tier of planning. It is stated that proposals to bring forward development through localism may threaten delivery in the villages because there are currently no proposals from the Parish Councils for Neighbourhood Plans to bring forward development in their areas. In addition, neighbourhood plans are often tools used by Parish Councils to restrict development, this will go against the aim of the plan. Allocation of sites in the villages through the District Plan is the only way to expedite delivery.	<b>No amendment to Plan in response to this issue</b>  A significant number of Parish Councils have started to progress Neighbourhood Plans and therefore the proposed approach is considered to be deliverable. Development in villages will be monitored throughout the plan period in order to ensure that a sufficient amount of new homes are being delivered in rural locations.



<b>Policy DPS3: Housing Supply 2011-2031</b>		
3.66	Policy DPS3 shows a contingency of 6%- in the event of delivery running behind schedule. The table clearly illustrates that this will not be a sufficient buffer to allow for potential slippage.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The table needs to be updated to reflect the revised strategy. A 20% buffer has now been included in the first 5 years of the plan period in order to recognise persistent under delivery of housing in recent years.</p>
3.67	Around 20% of the total alleged supply in the first five years is on unidentified sites, this is unsound.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>It is reasonable to include a small element of windfall development within the trajectory which has been based on past trends. This approach has been accepted by Inspectors at Local Plan Examinations elsewhere in the country. However, following an analysis of past trends, the amount of windfall identified has been reduced. This change should be reflected within Policy DPS3.</p>
3.68	The contribution of Hertford to the housing target is minimal, Hertford is allocated only 7.5% of the housing supply over the plan period. There is clearly scope for more development in Hertford.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The potential for further development in the Hertford area is limited by a number of issues. Most notably, the County Council has advised that the capacity of the A414 in Hertford is a considerable constraint which is unlikely to be overcome without a strategic intervention. Further planned development in the Hertford area is therefore not deliverable at this stage.</p> <p>Investigations have been undertaken by HCC to seek to identify measures that would mitigate congestion as part of ensuring that the highway network can operate with the additional development proposed in the Plan. 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. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.</p>
3.69	It will be extremely difficult to bring forward all the sites noted for early delivery due to planning permission, site preparation and infrastructure delivery issues. Therefore, strategic sites should be brought forward in line with the District Plan. Land at Thieves Lane, Hertford is ideally placed to be brought forward in the first five years of the plan.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Land at Thieves Lane, Hertford has been identified for delivery in the first five years of the plan period.</p>

3.70	St John's College Cambridge owns land west of the proposed allocations at Sawbridgeworth and states that it is imperative that the bypass remains an option for the District Council (and the County Council) to pursue and importantly development that does occur within the plan period does nothing to jeopardise or thwart any future plans for the bypass on the west side of the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The option for a large-scale extension west of Sawbridgeworth, involving up to 3,000 homes and a western bypass, was assessed in the Supporting Document to the District Plan. This concluded that the option was not suitable, given potential harm to the character of the town and also, when considered in conjunction with the Gilston Area, concern with regard to coalescence.</p>
3.71	The table utilised in DPS3 should be replaced with table shown in Appendix B.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The table in Policy DPS3 is a simplified version of the overall trajectory. It is considered appropriate to include the full version as an Appendix rather than the main body of the document.</p>
3.72	The word “minimum” should be added to the windfall allowance column in Policy DPS3 as smaller sites can help with the undersupply of housing.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is not considered necessary to identify the windfall figure as a minimum. It is inevitable that planning applications will be received for land that is not identified within the Plan. These will be assessed against the policies in the Plan through the normal development management process.</p>
3.73	The Stevenage west site needs to be re-considered, in order to take pressure off the villages.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The area to the west of Stevenage is not located within the administrative boundary of East Herts. It is therefore not for this Council to consider the merits of development in this location.</p>
3.74	It is assumed a key component contributing to the village allocations is the SLAA. Based on the information available 220 dwellings have been identified as suitable through the SLAA.	<p><b>No amendment to Plan in response to this issue</b></p> <p>An updated SLAA document which assesses sites on the edge of villages, as well as those within existing village boundaries, has now been published. This identifies that there are sufficient sites to meet the proposed level of growth in rural locations. In addition, it is highly likely that there are further sites that maybe considered suitable for development that have not been assessed through the SLAA process.</p>
3.75	The Bishop's Stortford Civic Federation is concerned that taken together with proposals in Uttlesford, the District Plan would lead to ribbon development from Harlow to Elsenham.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While the District Plan includes proposals for new housing on the edge of both Bishop's Stortford and Sawbridgeworth, the strategic Green Belt gaps between</p>

		settlements will be maintained.
3.76	There needs to be formal assessments of the sites identified in the call for sites 2009 and the District Plan sites.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This process has taken place through the SLAA with further consideration given to sites as part of the Sustainability Appraisal process.</p>
3.77	No need to plan beyond 2031 (footnote 2 of Policy DPS3). The uncertainty raised in 3.3.10 around the broad locations make this statement very strange.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Footnote 2 needs to be updated to reflect the change in approach to sites previously identified as Broad Locations. The Gilston Area will deliver 10,000 homes, both within this plan period and beyond. The NPPF is clear that local authorities should be satisfied that Green Belt boundaries will not need to be reviewed again at the end of the plan period. While it is not possible to know what the level of housing need will be beyond 2033, it is clear that the Gilston Area will be able to meet a significant proportion of this future need thereby reducing the need to further review Green Belt boundaries.</p>
3.78	<p>It is not clear from the evidence provided whether:</p> <ul style="list-style-type: none"> <li>• Sites have been assessed for site specific constraints e.g. protected trees/hedgerows, protected species, risk of flooding, heritage assets, contamination or air/noise quality.</li> <li>• Landowners are willing to sell/promote land for development.</li> <li>• There is a willing developer or house builder for each site.</li> </ul> <p>This information would normally be available via a SHLAA. However EHC do not have an up to date SHLAA. Therefore, it is questioned how housing numbers and delivery timing can be given.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Sites have been assessed both through the Sustainability Appraisal/Supporting Document process and also the SLAA. Constraints such as those listed in the representation have been considered as part of this work.</p> <p>Ahead of the Examination, the Council will be seeking to agree Statements of Common Ground with the site promoters of each of the sites identified within the District Plan. This will help demonstrate certainty of delivery to the Inspector.</p>
3.79	Given that the Broad Locations for Welwyn and Harlow adjoin those authorities, it could reasonably be argued that all housing completions in those adjacent areas within East Herts should be assigned to those authority areas as the likely service providers.	<p><b>No amendment to Plan in response to this issue</b></p> <p>All sites identified within the District Plan are required to meet East Herts housing needs.</p>

<b>Policy DPS4: Broad Locations for Development</b>		
3.80	A number of respondents made representations on Policy DPS4 in order to object to the identification of sites as Broad Locations due to uncertainty of delivery, and as a result, other sites should be allocated within the plan. Service providers also raised concerns regarding uncertainty over the quantum of development in these locations.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Given the evidence that is now in place, it is the view of Officers that all three sites should be identified as allocations within the forthcoming Pre-Submission version. This approach provides greater certainty to all parties regarding the delivery of development in these locations.</p> <p>As a result, this section should be removed from the chapter. Information about the delivery of the three sites previously identified as Broad Locations can be found in the relevant settlement chapters.</p>
3.81	Harlow Council considers that LPA’s should identify areas of “safeguarded land” in order to meet longer term development needs beyond the plan period. This approach may be relevant to Gilston.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Gilston Area will deliver 10,000 homes, both within this plan period and beyond. Given likely build out rates, a large part of the site would be delivered post 2033 – it is not considered necessary to reserve land to achieve this.</p>
3.82	Landowners, developers and planning agents state that the policy base for the broad locations is entirely unsound. These sites have not been considered properly in terms of financial viability, infrastructure or land assembly.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Issues regarding viability and infrastructure provision have been considered as part of the Delivery Study. Due to the level of evidence that is now in place, it is the view of Officers that the three sites previously identified as Broad Locations should now be allocated within the District Plan.</p>
<b>Policy DPS5: Infrastructure Requirements</b>		
3.83	HCC state that 3.3.17 should refer to other services which HCC is responsible e.g. Community protection, adult care and youth facilities (not just education and transport).	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Noted. It would make the sentence fairly wordy to include all services that HCC provide. However the wording could be amended to indicate that other services are provided as well as education and transport.</p>
3.84	Natural England suggests that it would be logical to include green infrastructure under the list of items in Policy DPS5 that may require financial contributions from developers.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The list of items in DPS5 includes critical infrastructure schemes that are essential to the delivery of the development strategy over the plan period. It is recognised</p>

		that many more schemes should also be delivered to support growth and these will be identified within the Infrastructure Delivery Plan. Nevertheless, the list in Policy DPS5 will need to be updated to reflect schemes which have become critical such as provision of a new Junction 7a on the M11.
3.85	DPS5 Criterion III, Part c), should be amended to read “New schools and the expansion of existing schools.”	<b>Proposed amendment to Plan in response to this issue</b>  Noted and agreed.
3.86	HCC state that they should be involved in the early stages of the IDP. It is important that the ability to mitigate new development is not limited just to planning obligations (DPS5 Part IV).	<b>No amendment to Plan in response to this issue</b>  Noted. HCC are being consulted with regards to the content of the IDP.
3.87	There needs to be greater clarity and detail with regards to infrastructure. The infrastructure delivery plan should be prioritised, in particular the levels of planning obligations as in DPS5 IV.	<b>No amendment to Plan in response to this issue</b>  Agreed. This is addressed through the Delivery Study and the Infrastructure Delivery Plan (IDP).
3.88	There will be insufficient public funding to produce the infrastructure required to meet the level of development. Who will be funding the infrastructure?	<b>No amendment to Plan in response to this issue</b>  Many infrastructure schemes will be provided on site by developers. For other schemes, such as school expansions, developers will contribute towards the cost through the use planning obligations. However, in order to deliver strategic schemes such as improvements to M11 junctions, significant funding from central government will be required.
3.89	NHS England raise concerns over the capacity of local practises to deal with the additional patients created from proposals. Significant contribution from CIL or Section 106 would be required. The addition of 15,000 houses (36,000 population) will require an additional 18 GPs and 3,582m <sup>2</sup> of surgery premises.	<b>No amendment to Plan in response to this issue</b>  Noted. NHS England will be consulted when the Council review the Planning Obligations SPD in order to ensure that the level of financial contributions sought is sufficient to allow the expansion of health facilities where required.
3.90	Concerns about school places, schools within East Herts are at capacity. It is questioned why more new schools are proposed in Bishop’s Stortford than in Ware/Hertford when there is larger scale development proposed for Ware/Hertford.	<b>No amendment to Plan in response to this issue</b>  The Council has worked closely with Hertfordshire County Council, as education authority, throughout the plan making process. In order to support the planned level of growth, new schools will be required alongside expansion of some existing schools. These schemes will all be identified within the Infrastructure Delivery Plan.

		<p>The level of development proposed for Bishop’s Stortford is greater than that proposed for Hertford and Ware combined. While primary education provision in Hertford was an issue at the time of consultation in 2014, especially at the primary level, the situation has been significantly improved by Simon Balle School becoming an ‘all through’ facility from September 2015. This has relieved pressure on other primary education facilities in the town. In addition, development to the North and East of Ware will include provision for a new secondary school. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.</p>
3.91	<p>Concerns about traffic congestion on many routes including: A120, A602, A414, A10, roads in and around Hertford and Bishop’s Stortford.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.</p>
3.92	<p>Concerns about rail capacity. Why can’t rail links be extended? This will solve issues connected to air quality, transport and sustainability.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail. These are ongoing and they will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses.</p> <p>The need for additional capacity on the Liverpool Street line has been highlighted through several mechanisms and the four-tracking of the line between the Tottenham Hale and Broxbourne areas has been included in Network Rail’s recently published Anglia Route Study, March 2016:  <a href="http://www.networkrail.co.uk/Anglia-Route-Study.pdf">http://www.networkrail.co.uk/Anglia-Route-Study.pdf</a></p> <p>This currently anticipates potential commencement within Control Period 6 (i.e. between 2019-2024).</p>
3.93	<p>Stevenage Borough Council suggests that the capacity of Rye Meads Sewage Treatment Works will need to be reviewed.</p>	<p><b>No amendment to Plan in response to this issue</b></p>

		The Council has engaged with Thames Water throughout the plan making process. Their latest advice indicates that Rye Meads STW has sufficient capacity to cater for all growth in the wider sub-region up to 2033 and beyond.
3.94	Great Munden Parish Council and others are concerned that the Little Hadham Bypass could increase traffic speed and volume through Standon and increase the possibility of east/west traffic problems.	<b>No amendment to Plan in response to this issue</b>  The benefits of providing a potential bypass for Standon and Puckeridge are recognised, although it is not clear at the present time how such a scheme would be funded or delivered. Hertfordshire County Council, as the Highway Authority, took the decision in 2006 to focus on seeking to fund two separate local bypasses, with a decision to prioritise Little Hadham first. A commitment was made to look at options for Standon/Puckeridge once the Little Hadham bypass had been delivered and local initial consultation was undertaken by HCC between February and March 2016. Therefore, as HCC would be the responsible authority for delivering such a bypass, this issue falls outside the remit of the District Plan.
3.95	Thorley Parish Council is concerned that the Local Planning Authority does not have the ability to enforce S106 agreements. An example of this is the developer agreements to provide shops at St. Michael's Mead, which was not forthcoming. The Member of Parliament and the District Council should work together to ensure that the necessary legislation is enacted to prevent this happening again.	<b>No amendment to Plan in response to this issue</b>  Noted. While the spending of S106 contributions falls outside the plan making process, the Council is working with HCC in order to ensure that S106 payments and expenditure are monitored closely and contributions are spent before the end of the statutory timescales.
3.96	The Environment Agency supports Policy DPS5, particularly in regards to sewage infrastructure.	<b>No amendment to Plan in response to this issue</b>  Support noted and welcomed.
3.97	Question whether Affinity Water and Thames Water are able to meet the demand for water supply/sewage from the proposed development.	<b>No amendment to Plan in response to this issue</b>  Throughout the Plan making process, the Council has engaged with the relevant water providers in order to ensure that the proposed level and location of growth can be provided for. The water companies have not objected to the proposed scale or location of development in East Herts.
3.98	Stansted Airport Ltd is concerned that there needs to be specific evidence, and a mechanism to ensure that fair and proportionate contributions towards the upgrades to Junction 8 of the M11 will be secured. The IDP document should be consulted on before the District Plan so to avoid unnecessary	<b>No amendment to Plan in response to this issue</b>  It is recognised that upgrades to Junction 8 will be required in order to facilitate the level of growth envisaged in conjunction with increased patronage at Stansted Airport and this is recognised by the Infrastructure Delivery Plan.

	debate and objection.	A Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth.
3.99	Thames Water supports Policy DPS5 and the accompanying text in section 3.3.16-20.	<b>No amendment to Plan in response to this issue</b>  Support noted and welcomed.
<b>Policy DPS6: Long-Term Planning</b>		
3.100	A number of respondents have questioned the merits of including this section within the chapter, mostly because it does not engender confidence that the identified strategy will be delivered.	<b>Proposed amendment to Plan in response to this issue</b>  It is considered that this section should be removed as there is now more evidence and more certainty that large scale strategic sites will be delivered. The strategy also now includes a 20% buffer in the first 5 years of the plan period in order to provide greater certainty of delivery. Following adoption, the implementation of the plan will be monitored. If targets are not being met then it is likely that a review of the Plan would be triggered.
<b>Policy DPS7: Presumption in Favour of Sustainable Development</b>		
3.101	The Labour Party welcome the significant growth in housing noted in the plan. A future must not be created where the extreme cost of housing in East Hertfordshire forces the next generation to live miles away. Housing is also important in accommodating our changing society where people live longer and marry later. Housing growth is a good thing if planned properly with supporting infrastructure (including social infrastructure). Lastly, houses need to be viewed as homes and not investment vehicles.	<b>No amendment to Plan in response to this issue</b>  Noted.