

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
3.1 Introduction	
3.1	<u>Objection</u> 1. The Council has identified the development strategy and then made the evidence fit to support it.
3.1.2	<u>Objection</u> 1. There are three mutually dependent elements of sustainability which must be achieved rather than just 'mitigated'.
3.2 Level of Growth	
3.2	<u>Objection</u> 1. The Plan does not take account of London's housing needs.
3.2.1	<u>Objection</u> 1. Existing infrastructure is not sufficient to support the level of development identified.
3.2.2	<u>Objection</u> 1. The housing target should take account of the need to avoid breaching environmental/policy constraints – objectively assessed housing need does not need to be met in full. 2. The existing under provision in infrastructure should be considered.
3.2.4	<u>Objection</u> 1. The amount windfall completions likely to take place over the plan period have been underestimated. 2. The Plan does not meet the needs arising from the 2014 household projections which were published in July 2016. 3. More information is required on how the level of housing need across the Housing Market Area has been disaggregated among the four authorities.

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3.2.6	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The housing need figure does not include the projected increase in the institutional population. There is a need for approximately 530 C2 bed spaces.
3.2.7	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. If the objectively assessed housing need is calculated over the Housing Market Area then joint or aligned plans should have been prepared. 2. The Local Plans of Housing Market Area partners don't use the same time horizon. 3. A 'bottom up' approach to calculating housing need should be used rather than the SHMA. This approach would seek to meet the housing needs of local people first. 4. The SHMA is based on past population trends which have been projected forward. This inhibits any change in future growth. 5. The SHMA does not take into account the fact that the U.K is leaving the European Union. 6. London will be providing significantly more affordable housing which may reduce migration to areas such as East Herts. 7. Ryanair will be focusing expansion away from Stansted Airport which may reduce demand for housing. 8. A 20% uplift in the SHMA, to take account of affordability issues, is too high. 9. The period 2001-2011 catered for mass expansion at Stansted, these trends should therefore not be projected forward. 10. Unclear why the East of England Model issued in August 2016 has not been considered. This model shows much lower growth figures. 11. The migration figures which form part of the SHMA are too low. 12. The SHMA does not address market signals which suggest a further uplift is required, such as high rental levels and high house prices.

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	13.It is not clear from the SHMA how the housing need figure has been identified.
3.2.8	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The annual increase in employment shown in the SHMA is excessive. 2. There isn't a clear explanation within the SHMA how the growth of 10,000 extra jobs at Stansted Airport has impacted on housing need. 3. A figure of 5,000 jobs at Stansted Airport would be more realistic. This would reduce housing need.
3.2.9	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for provision of 11 hectares of employment land. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The release of Green Belt land for employment purposes at Bishop's Stortford South and North and East of Ware should be avoided. 2. The list should be amended to include employment land as part of the East of Welwyn Garden City site. 3. Providing additional employment land at Mead Lane, Hertford is not in accordance with the Mead Lane Urban Design Framework.
DPS1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. The Council has taken a pragmatic view in terms of meeting the housing need identified in the SHMA, while committing to an early review to deliver higher numbers that have emerged late in the Local Plan process. 2. Support for seeking to deliver in excess of the housing need figure identified in the SHMA. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The housing target should be reduced due to Green Belt constraints. 2. The housing target is out of date and does not reflect the higher requirement of 19,500 homes. The Objectively Assessed Need is therefore not being met.

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	<ol style="list-style-type: none"> 3. Provision of additional jobs and infrastructure to meet this housing need is essential. 4. The housing target should be increased, including to reflect higher migration figures as the SHMA is based on data from 2001 to 2010 and therefore excludes years of higher migration (2011 and 2012). 5. The Plan should require a minimum proportion of new employment space be for B1 use to encourage higher order activities such as Research and Development. 6. The amount of employment floorspace that will be delivered should be identified. 7. It is unclear how the additional 9,700 jobs will be delivered. 8. Green Belt land should not be used to deliver employment growth. 9. Further employment land should be identified to cater for employment needs. 10. The rise in internet shopping means that the level of additional comparison goods floorspace may not be required.
3.3 Development Strategy	
3.3	<u>Objection</u> <ol style="list-style-type: none"> 1. The possibility of delivering a new settlement should not have been rejected at an early stage of plan making. This would be more sustainable than adding smaller developments to the edge of existing settlements. 2. No methods to support delivery are mentioned such as delivery partnerships, local housing companies and modern methods of housing construction. 3. Lower grade agricultural land should be used for housing rather than higher grade land.
3.3.2	<u>Support</u> <ol style="list-style-type: none"> 1. Support for Guiding Principle 6. <u>Objection</u> <ol style="list-style-type: none"> 1. The Guiding Principles are not consistent with housing or Green Belt policies.

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	<ol style="list-style-type: none"> 2. Guiding Principle 3 is wrongly expressed and should say that development will be directed to settlements where people want to live. 3. Guiding Principle 4: it is not clear that new boundaries are 'unambiguous' or that they will be defensible in future. 4. Guiding Principle 7: unsound as the need for large scale strategic development has not been evidenced. 5. Guiding Principle 9: unsound as it promotes the principle of development in Green Belt locations on the edge of villages.
3.3.4	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. This paragraph does not reflect the fact that housing need does not need to be met in full if constraints such as Green Belt exist. 2. Delivery of 1,200 homes per year in the first 5 years is unrealistic.
3.3.7	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. A 5% buffer should have been used rather than 20%.
DPS2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The number of homes to be delivered in villages should be identified in order to assist in planning for school places. 2. The Council should evidence agreement with developers that town centre brownfield sites will be mixed use. 3. Clarification is required with regards to how housing needs arising from two functional housing market areas have been addressed. 4. There is a reliance on Neighbourhood Plans to bring forward development in villages – delivery is therefore uncertain.
3.3.10	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Should the Plan be adopted in 2018, there will still be a shortfall in 5 year land supply.

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3.3.13	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The need to 'plan positively' does not override the other three tests of soundness.
DPS3	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for the inclusion of various sites within the Plan. 2. Support for removing sites from the Green Belt in order to help meet housing need. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The Plan is over reliant on sites adjacent to the M11. If required highway infrastructure is not provided, the housing supply will be affected. 2. The Plan should not rely on SLAA sites which should form part of the windfall figure. 3. The cumulative impact of different developments on Rye Meads Sewage Treatment works should be considered. 4. Inclusion of Green Belt sites is unsound, Exceptional Circumstances have not been demonstrated. 5. There may be issues of double counting, particularly in relation to windfall, villages and SLAA categories. 6. The policy should distinguish between Green Belt sites and others. 7. Less housing should be directed to Bishop's Stortford. 8. More housing should be directed to villages. 9. East of Stevenage should be removed and replaced with a new Garden Village. 10. The Plan does not provide a 5 year supply of sites. 11. Some sites identified in the first 5 years don't have planning consent and further work is required to demonstrate their deliverability. 12. There is a need for a greater number of smaller sites which will deliver housing early in the Plan period. 13. A lapse rate of 10% should be incorporated within the commitments figure.

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	<p>14. There is no Housing Implementation Strategy as required by Para 47 of the NPPF.</p> <p>15. There is no contingency plan should development not come forward as expected.</p> <p>16. There is not sufficient evidence to suggest that 50 homes per year will be delivered as windfall.</p> <p>17. Including a windfall allowance in the first 5 years (2017-2022) is inappropriate.</p> <p>18. There should be a breakdown of housing numbers for commitments and completions in order to understand the true level of development that is being directed to different settlements.</p> <p>19. Various alternative sites have been promoted as being suitable for allocation.</p>
3.3.20	<p><u>Objection</u></p> <p>1. There are a large number of gaps in the Infrastructure Delivery Plan and therefore the District Plan cannot be considered 'sound'.</p>
DPS4	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for identification of the importance of providing appropriate levels of infrastructure. 2. Support for the policy approach. 3. Support for identification of highway infrastructure schemes in the Harlow area including Stort Crossings and M11 junctions. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Green Infrastructure should be added to the list. 2. A120 improvements to facilitate development in Standon and Puckeridge should be included. 3. The completion of the south eastern portion of the Bishop's Stortford bypass is required. 4. There are already infrastructure deficits. 5. The identification of the 'full option' for improving Junction 8 of the M11 is required at an early stage. 6. There is no certainty of delivery of infrastructure schemes.

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	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Regard will need to be had to ongoing transport modelling, and in particular outputs of the COMET model in relation to impacts on the A10 within Broxbourne Borough.
3.3.22	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The cumulative need for strategic infrastructure, taking into account growth in neighbouring areas, has not been evidenced.
3.4 Review of the District Plan	
3.4.1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. It is unclear how the uplifted figure of 54,600 with 19,500 in East Herts has been reached.
DPS5	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. The commitment to review the Plan is in conformity with the MoU on the distribution of housing need across the Housing Market Area. 2. Support for an early review of the Plan. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The policy should say that a review of the Plan will make provision for additional homes depending on the provision of necessary infrastructure, both within and outside East Herts District. 2. This policy is not compliant with the NPPF as East Herts is not meeting its full housing needs. 3. There is no reason why additional sites could not be identified now through this Plan. 4. The policy could be broadened to state that the outcomes of further transport modelling, particularly in relation to the deliverability of highways schemes such as a Hertford and North Harlow bypasses, may trigger a review of the Plan. 5. There needs to be an indication of the timing of any review.

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3.5 Neighbourhood Planning	
3.5	<u>Objection</u> 1. Requirement for additional text which says that Neighbourhood Plans may not promote a lower level of development than that identified in the District Plan.