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Please ask for:
Alison Marston

* Reporting to Cabinet

13 July 2022

Dear Councillor

You are requested to attend a meeting of the WELWYN HATFIELD BOROUGH COUNCIL CABINET PLANNING AND PARKING PANEL to be held on Thursday 21 July 2022 at 7.30 pm in the Council Chamber, Campus East, Welwyn Garden City, Herts, AL8 6AE.

Yours faithfully



Governance Services Manager

AGENDA
PART 1

1. **SUBSTITUTIONS**

To note any substitution of Panel Members in accordance with Council Procedure Rules.

2. **APOLOGIES**

3. **MINUTES**

To confirm as a correct record the Minutes of the meeting held on 23 June 2022 (previously circulated).

4. **NOTIFICATION OR URGENT BUSINESS TO BE CONSIDERED UNDER ITEM 8**

5. **DECLARATION OF INTERESTS BY MEMBERS**

To note declarations of Members' disclosable pecuniary interests, non-disclosable pecuniary interests and non-pecuniary interests in respect of items on this Agenda.

Part I

Main authors: Sue Tiley

Executive Member: Cllr Stephen Boulton

All Wards

WELWYN HATFIELD BOROUGH COUNCIL
CABINET PLANNING & PARKING PANEL – 21 JULY 2022
REPORT OF THE HEAD OF SERVICE (PLANNING)
LOCAL PLAN – INSPECTOR'S LETTER AND PROPOSED MODIFICATIONS TO THE PLAN

1. **Executive Summary**

- 1.1 The purpose of this report is to consider the Inspector's response to the Council's letter dated 12 February 2022 and his further response dated 5 April 2022 advising him of the Council's decision relating to the Local Plan and additional sites. His response is published as [EX283](#) and his further response is published as [EX285](#).
- 1.2 The Inspector has indicated that the strategy for 13,279 dwellings would not be sound but has indicated that a plan which identified sufficient sites to meet the five year land supply and to provide at least 10 years supply from the point of adoption could be made sound. This report also considers options for adding in sufficient sites to meet this requirement.
- 1.3 Appendix A to this report provides a schedule of sites and a summary of options for adding sites to the housing land supply. Appendix B provides maps of the settlement with options for additional sites. Appendix C set out the Housing Trajectory for all sites. Appendix D sets out the different approaches to calculating the housing requirement for 'ten years' worth of sites. Appendix E provides a summary of the first results from the 2021 Census. Appendix F sets out a Schedule of the Main Modifications for the Topic Specific Policies.

2 **Recommendations**

- 2.1 That Members of this Panel
 - i) Consider the implication of different approaches to managing the shortfall over the remaining plan period set out in the report and the appendices.
 - ii) Agree to recommend to Cabinet and Council that the additional sites set out in Table 6 of the report and which offers the best opportunity for reaching a sound plan be submitted to the examination as modifications to the Local Plan, and;
 - iii) Recommend to Cabinet and Council that public consultation take place on Main Modifications to the Local Plan at the earliest opportunity once the Inspector has confirmed the content of the Main Modifications required to make the Plan sound.

If Members do not agree to recommendation ii and iii above

- iv) Agree to recommend to Cabinet and Council that the additional sites set out in Table 4 of the report that responds to the relationship of the Full Objective Assessment of Housing Need to the Employment Strategy and the need for housing to be provided alongside new jobs.

- v) Members recommend to Cabinet and Full Council that public consultation take place on Main Modifications to the Local Plan at the earliest opportunity once the Inspector has confirmed the content of the Main Modifications required to make the Plan sound.

3 Background

- 3.1 On 13th January this Panel considered a report which presented options for meeting the Full Objective Assessment of Housing Need (FOAHN) of 15,200 dwellings for the Local Plan period 2016-36. The papers included an update to the Housing Sites Selection Background Paper Addendum which took into account the Inspector's findings and guidance and the Sustainability Appraisal Addendum. The Site Selection Addendum sets out the infrastructure implications associated with additional sites.
- 3.2 Officers identified several options for delivering 15,200 dwellings. However, these were rejected by Members. Instead, the Panel proposed that the Council's previous strategy agreed in November 2020 be put forward for consideration by Cabinet and Council. This strategy identified a supply of sites for 13,277 dwellings to meet what the Council considered should be the FOAHN of 13,800 dwellings. Appendix A to this report lists the sites (NB the capacities of those sites reflects the updated assessment arising from current planning applications or decisions and takes into account where completions have occurred). Appendix B provides a series of maps with sites under consideration.
- 3.3 This recommendation was considered by Cabinet alongside an analysis from officers of the changes in the evidence since November 2020 which impacted on the strategy. This included several sites being found unsound by the Inspector, changes to the windfall allowance, and another year of completions and commitments. As a consequence, some amendments to the strategy were made to arrive at a distribution of 13,279 dwellings. This was presented to Council at a special meeting on 27th January 2022. Members considered the implications for the five year land supply and the phasing of delivery across the plan period. It was noted that the availability and size of sites resulted in most of the development being delivered in the first ten years post adoption. The Council's letter to the Inspector is published as [EX282](#).
- 3.4 The Plan is being examined under the policy requirements set out in the 2012 National Planning Policy Framework (NPPF) rather than the revised policy requirements first set out in the 2021 NPPF. This means that the housing requirement for the Plan is established through an assessment of the FOAHN rather than the standard housing methodology. Local Planning Authorities are required to positively seek to meet the FOAHN although lower housing requirements can be set in circumstances which are justified by other policies in the NPPF. Recent Local Plan examination in Hertfordshire have resulted in the housing requirement meeting the FOAHN (East Herts, Broxbourne, and Stevenage).
- 3.5 North Herts further main modifications consultation confirms that in addition to meeting their FOAHN they are also meeting some of Luton's unmet housing needs.
- 3.6 The assessment of the FOAHN is a technical exercise which informs the housing requirement which is set as a target in the Local Plan and upon which the performance of the Council is monitored.

- 3.7 In allocating sites, the Local Planning Authority is required to identify a supply of housing which as a minimum meets the housing requirement or target. Whilst the Local Planning Authority set the housing requirement it must be justified by the evidence and is required to meet the tests of soundness. Because this Local Plan is being examined under the transitional arrangements the plan is required to provide for as a minimum objectively assessed needs for housing unless NPPF which protect areas or assets provide a strong reason for doing so or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF (paragraph 11). The Inspector has concluded they do not.
- 3.8 National Planning Practice Guidance sets out the methodology for calculating the FOAHN for those plans being examined under the transitional arrangements. New plans would have to use the figures derived from the Standard Methodology. The current approach to calculating the requirement for 2022/23 results in a requirement of 888 dwellings per year (dpa) and is likely to result in a requirement for 892 dpa for 2023/22.
- 3.9 Paragraph 47 of the 2012 NPPF sets out that planning policies should identify specific deliverable sites for years 1-5 of the plan period and specific developable sites or broad locations for growth for years 6-10 and where possible years 11-15.
- 3.10 The Inspector's response to the Council's submission of sites equating to 13,279 dwellings is published on the Council's website as [EX283](#). In EX283 he first addresses why he considers the FOAHN of 15,200 to still be appropriate. This is in part driven by the plan's employment strategy which has been found sound. He then sets out that despite the Green Belt harm that will result from this level of provision he does not consider the circumstances warrant a lower housing requirement.
- 3.11 However, he has looked sympathetically at an approach based on identifying sites for the ten year period following adoption. This would provide an opportunity to review the performance of the plan as well as determining which additional sites should be allocated. The review would also be undertaken in the context of housing need, national policy, and other relevant circumstances prevalent at the time of the review.
- 3.12 If the Council wishes to follow this approach rather than withdraw the plan it must set out a timetable for finalising the Main Modifications for consultation. In paragraph 16 he sets out a number of requirements for the Main Modifications which will need to acknowledge the FOAHN for the period to 2036 and the impact of the shortfall in provision to date on the annual residual requirement so that the five year land supply can be calculated. This will need to take account of housing completions to March 31st 2022.
- 3.13 The Inspector's response also updates his conclusions on the soundness of the sites put forward by the Council for removal from the Plan. HS24 (BrP7) in Little Heath and SDS6 (HAT15) Symondshyde are now unsound whereas HS29 (Cuf7) and HS30 (Cuf12) in Cuffley are now sound. A fifth site HS22 (BrP4) had previously been found sound and the Inspector has confirmed that this remains the case.
- 3.14 In [EX285](#) he acknowledges that the planning issues have not been easy but that the plan can only move forward if the Council accepts the conclusions of the independent examination and carries out consultation on the recommended Main Modifications (MMs).

- 3.15 He stresses that he is not now asking for the supply of land to meet the full twenty-year plan period (2016-36) but that a supply to meet the requirements for the ten years post adoption would be appropriate including the residual amount that was not achieved between 2016-22.
- 3.16 To have a realistic prospect of adoption by 2022 he set a deadline of 8th July 2022 for the submission of evidence sufficient to demonstrate a ten year housing land supply with main modification consultation commencing shortly thereafter.
- 3.17 Unfortunately, because of the need to call a by-election it has not been possible to meet that deadline and a revised programme has been put together which will result in the Council submitting the evidence following its meeting on 26th July 2022.
- 3.18 The Inspector has responded to the revised timetable advising that if modifications are submitted to him on matters he has already agreed prior to this meeting and the outstanding matters straight after this meeting it may still be possible to prepare the plan on the basis of the five and ten year period commencing on 1st April 2022. The Main Modifications for the Topic specific policies are attached as Appendix F to this report.
- 3.19 The Levelling Up and Regeneration Bill proposes reforms to the plan making system. The Bill and policy notes which accompany it have not indicated any changes to the approach to identifying housing numbers. It was expected that a consultation version of proposed changes to the NPPF would be published in July. It is possible that this timetable may now be put back given the change in Ministers in the Department of Levelling Up Housing and Communities.

4 Explanation

The Housing Requirement

- 4.1 The FOAHN for the borough is 15,200 dwellings this equates to a 10 year target of 7,600 dwellings. The list of sites submitted to the examination do meet the 10 year FOAHN but the buffer and shortfall in provision since 2016 also need to be added to the figures in order to calculate the residual requirement and the to find figure for additional sites. Table 1 sets out the requirement for a ten year period before the shortfall is taken into account.

Table 1 Ten Year Requirement

Housing Requirement	2016-2022	10 Year Requirement	Cumulative 10 year total
Target	4,560	760 x10	7,600
Buffer (20%)	N/A	760-422.2	7,937.8

- 4.2 The Council has updated its monitoring of commitments and completions for the period to March 2022 in order to calculate the shortfall and update the housing supply data for the borough. These equate to **2,731 dwellings** and compares with the target of **4,560 dwellings** (760 x 6) resulting in a shortfall of **1,829 dwellings**.

4.3 Table 2 sets out the residual requirement calculations. This adds the shortfall of 1,829 to the 10 year requirement of 9,302 and results in a residual requirement of 12,469 (15,200 – 2731) and an average residual annual requirement of 891 dpa as indicated in Table 2. The Inspector’s letter indicates that he would use this figure to set the annual requirement for the remainder of the plan period unless the Council could justify a stepped target.

Table 2 Residual requirement for the Plan period

Housing Requirement	Completions 16/17 - 21/22	Years 1-5 (2022/23-2026/27)	Years 6-10 (2027/28-2031/32)	Years 11-14 (2032/33-2035/36)	Total residual requirement	Total Years 1-10
Target		4,453	4,453	3,563		
Buffer (20%)		890.6	-494.8	-395.8		
Total Required	2,731	5,343.6	3,958.2	3,167.2	12,469	9,301.8

4.4 The Planning Practice Guidance and the National Planning Policy Framework (NPPF) state that the shortfall should be made up over the first five years and this needs to be factored into the calculations. However this is not always possible and plans have been found sound with shortfalls made up over a longer period. The different approaches to managing the shortfall across the plan period are set out in Appendix D to this report.

4.5 In [EX288](#) the Inspector has indicated that unless main modifications are submitted on 22nd July the five and ten year period requirements would need to commence from 1st April 2023. The 10 year ‘to find figure’ increases to varying amounts as a consequence of later start dates and the approach to managing the shortfall.

4.6 It seems unlikely that the Council will be able to meet the requirement for Main Modifications to be submitted by 22nd July 2022. This report therefore examines the options for achieving a sound plan on the basis of meeting the targets using 1st April 2023 targets, however the target for 1st April 2022 are also set out in Appendix D for information. The targets for the later plan period range from 10,009 to 9,462 and five year land supply of 6,931 to 4,560.

4.7 Members will be aware that the first results from the Census have been published. A short note on the results and their relationship with the population projections is included as Appendix E. The demographic projections are the starting point for setting the FOAHN.

Trajectory

4.8 In [EX283](#) the Inspector has stated that he will need sound evidence to demonstrate that at adoption the plan will ensure a supply of housing land capable of delivering five year’s housing against the plan’s housing requirement, with flexibility to respond to changing circumstances. Officers have updated the evidence of the deliverability of all sites under consideration. Not all promoters have responded to officer’s request for information which would mean that the NPPF test for clear evidence relating to their inclusion in the five year supply would not be met. Appendix C sets out the Housing Trajectory for all sites.

- 4.9 The housing trajectory demonstrates that it will be impossible to meet the shortfall in the first five years of the plan but there are options for making up the shortfall over the first 10 years of the plan period and such a strategy would give the Council the best chance of securing a sound plan. This approach results in a minimum 'to find' figure of a minimum of **9,861** dwellings and a five year land supply of **4,560**. It should be noted however that this approach would not make provision for a five year land supply associated with the residual requirement (891dpa) and would require a stepped target. Ideally then a five year land supply of **5,344** should be sought. The options for delivering this are discussed in paragraphs 4.12 onwards.
- 4.10 Members will recall that the FOAHN was increased to 15,200 dwellings because of the Council's Employment Strategy set out in the Local Plan which seeks to make provision for additional jobs to meet the needs of a growing population. The borough has seen a loss of employment land in recent years and it is anticipated that new employment land will not deliver additional jobs from the Marshmoor site until year 4 onwards. It could therefore be argued that it is inappropriate to front load this part of the shortfall in provision whilst the borough continues to see an overall and continuing loss of employment land since the start of the plan period.
- 4.11 It could therefore be argued that the use of the Liverpool methodology which spreads the shortfall across the full plan period is more appropriate to the borough's circumstances. The report therefore also considers options for delivering this approach. This would result in a 'to find' figure of **9,462** and a five year land supply requirement of **5,472** which also meets the requirements for the five year land supply associated with the residual requirement.

Options for additional sites and updates to capacity

- 4.12 Table 1 of Appendix A sets out the updated completions data and changes to capacity assumptions associated with the sites which previously made up 13,279 and the reasons for those changes. Table 3 below provides a summary.
- 4.13 The most significant of these changes relates to SDS3 Broadwater Road West. The Council previously agreed to an increase in capacity of 600 dwellings on this site as it was known that applications for the north and southern parts of the site would propose an increase in dwelling capacity. However whilst the Inspector has concluded the allocation is sound he has not considered the deliverability of the additional 600 dwellings. It is anticipated that revised applications will collectively now deliver an additional 300+ but there is still a level of uncertainty. It may be more prudent to revert to the numbers associated with the original planning permission which resulted in 1,403 dwelling equivalents and which is partially being implemented as 208 dwellings are expected to complete on this site this year.
- 4.14 Site SDS4 also lies within the Broadwater Road West Policy area it comprises the Pall Mall and BioPark areas. It is proposed to combine the two comprise a single allocation as they relate to the same policy area and are covered by the Masterplan. This will also allow greater flexibility for decision making across the individual parcels.
- 4.15 The remaining changes to capacity reflect submitted planning applications or recent consents as set out in the Table 1 Appendix A.

- 4.16 It should also be noted that some sites proposed for allocation have some completions or are currently under construction and therefore part of the site's capacity whilst contributing to overall supply during the plan period cannot be included in the 10 year post adoption figure. This is set out in the notes in Table 1 of Appendix A and detailed in Appendix C the Housing Trajectory.
- 4.17 Table 3 below provides a summary of the changes and indicates that whilst the sites agreed by Members would deliver ten years' worth of sites against the target they would not make up the shortfall or deliver a five year land supply when measured against the residual requirement.

Table 3 - Update to Housing Supply since January 2022 Special Cabinet

Supply Source	January 2022 - Special Cabinet	Updated capacity	10 year Capacity	5 Year Capacity
Completions	2,514	2,731	n/a	n/a
Estimated completions 2022/23	n/a	613	n/a	n/a
Commitments – minus estimated 22/23 completions	806	486	486	462
Windfall	1,668	1,529	1,112	417
Small Sites	14	13	13	5
Site Allocations (see Appendix A) – less any expected completions 22/23	8,277	7,403	6,906	4,408
Total	13,279	12,775	8,517	5,292

- 4.18 The approach to the selection of additional sites still needs to meet the criteria set by the Inspector in his previous reports and Members should refer to [the Housing Sites Selection Background Paper Addendum](#) produced by officers and reported to Members of this Panel in January 2022. However, Members should be aware that since that report was prepared the Inspector has reaffirmed the soundness of HS22 (BrP4) in Brookmans Park and confirmed the soundness of HS29 (Cuf7) and HS30 (Cuf12). He has also confirmed that SDS6 (Hat15) Symondshyde and HS24 (BrP7) in Little Heath are unsound and therefore can no longer be included as potential allocations. The release of these three sites all result in high harm to the Green Belt but evidence to the examination indicates that this can be mitigated with the use of landscape buffers.
- 4.19 Another 448 dwellings can therefore be added to the supply figures resulting in a total of **8,965** dwellings for the 10 year period.
- 4.20 The Inspector has indicated that more land should be removed from the Green Belt than indicated for HS22 (Brp4). This additional land **BrP4a** could be treated as safeguarded land but as the land is to be removed from the Green Belt and as it would also assist in the provision of a primary school it is recommended that this area be included as an additional allocation. However, this additional land would not contribute to the five year land supply.

- 4.21 As the Inspector considers the omission of some small Green Belt sites which do not contribute to high harm to the Green Belt has yet to be justified a review of the smaller sites which will improve the five year land supply has been undertaken. These are listed in Table 3 of Appendix A to this report. Cumulatively they would deliver a potential capacity of 598 dwellings and therefore collectively would more than meet the Liverpool approach to managing the shortfall.
- 4.22 The majority of this group of smaller sites result in only moderate harm to the Green Belt. These include **StL1** for 90 dwellings in Stanborough whilst **StL15** also in Stanborough (8 dwellings) does not have a harm assessment. Neither of these sites were previously recommended for inclusion in the Local Plan in January as discussed in the Site Selection Addendum this would result in the doubling of size of the settlement and would be disproportionate for a settlement which has no facilities or services.
- 4.23 **StL13** in Lemsford also results in only moderate harm to the Green Belt. An application for 33 dwellings has been submitted. The HELAA assessed the site as being suitable for 27 dwellings and it is considered the capacity estimate could be increased to 30 dwellings. The inclusion of the site would assist in meeting the needs of the settlement arising from natural growth.
- 4.24 **WGr3** would also result in moderate harm to the Green Belt. It also was not recommended for inclusion in the Local Plan as Woolmer Green has already met its proportionate share. Furthermore it is really an extension to Knebworth. However, it is a small site for 25 dwellings in a sustainable location and would not represent a significant increase in provision.
- 4.25 **WeG6** and **WeG12** would also result in moderate harm to the Green Belt and have been included in every single option developed by officers as they perform well against the site selection criteria. With regards to WeG12 the Inspector has indicated that this site could be restricted to land south of the Pylons thereby potentially reducing its capacity from 83 to 45. Only part of **WeG15** would be accepted by the Inspector as this results in 'moderate to high' harm to the Green Belt and is open in character. As previously set out the capacity of the site has been reduced to 56 dwellings. It could additionally accommodate a primary school if required in order to provide sufficient land for a primary school in Welham Green.
- 4.26 **OMH9** and **Dig1** were previously recommended for inclusion in response to the Inspector's report as they provided additional dwellings in the Welwyn Parish area.
- 4.27 Assuming WeG12 is developed for 83 dwellings then this group of sites would deliver a total 10 year figure of **9,465** and improves the five year land supply from 5,292 to **5,812**. This would meet the Liverpool approach to meeting the shortfall and meets the five year land supply requirement associated with the residual requirement. However not all the shortfall would be met during the first ten years and some settlements are taking a larger share of the allocations when measured against the Local Need range set out in Table 5. Welham Green in particular would be almost 100 dwellings over the Local Needs Range but the Inspector considers Welham Green to be the most sustainable of the excluded villages and that this consideration is enhanced further by the allocation of employment land at Marshmoor.
- 4.28 The Local Need Range is defined in the Site Selection Addendum reported to Members of this Panel in January this year. It responds to the Inspector's reports and his advice

on the approach to be taken to the selection of sites. The range at the lower end relates to need arising from natural growth which is the minimum that settlements should be achieving and at the higher end the proportionate share of the FOAHN. Windfall is not included in the settlement figures as by definition their location is unknown.

Table 4 Recommended Additional Sites to meet Liverpool approach

Settlement	LP / HELAA ref	Site	Dwellings
Woolmer Green	WGr3	Land adjacent to 52 London Road	25
O&MH	OMH9	Land to the rear of 19-23 The Avenue	25
Digswell	Dig1	Land east of New Road	80
Lemsford	StL13	Land at Roebuck Farm, Lemsford	30
Welwyn Green	WeG6	Skimpans Farm, Welham Green	73
Welwyn Green	WeG12	Pooleys Lane, Welham Green	83
Welwyn Green	WeG15	Potterells Farm, Welham Green	56
Brookmans Park	HS22 (BrP4) & Brp4a	Land West of Brookmans Park Station	428
Cuffley	HS29 (Cuf12)	Land North of Northaw Road East	73
Cuffley	Hs30 (Cuf7)	Wells Farm, Northaw Road East	75
Total			948

Table 5 Settlement Distribution for Plan period

Settlement	Completions 1 Apr 2016 - 31 Mar 2022	Commitments (1st Apr 2022)	Allocations	Total	Local Need Range
WGC	1,416	251	4,257	5,924	1,464 – 6,797
Hatfield	853	230	2,607	3,690	995 - 4,621
Woolmer Green	76	0	209	285	43 - 201
O&MH	25	9	56	90	89 - 413
Welwyn	178	12	76	266	112 - 521
Digswell	12	20	80	112	47 - 219
Lemsford	0	0	30	30	7 - 30
Stanborough	17	2	0	19	9 - 41
Welham Green	12	1	528	541	96 - 445
Brookmans Park & Bell Bar	64	20	452	536	109 - 506
Little Heath	6	0	98	104	34 - 158
Cuffley	52	9	335	396	132 - 611
Rural Areas	20	165	0	185	137 - 635
Total	2,731	719	8,728	12,178	

4.29 However as previously indicated government guidance requires the shortfall to be met as soon as possible. This requires a further 396 dwellings to be added to the supply and requires consideration of the larger sites. Table 4 of Appendix A lists the larger sites and their capacities. There are options in Welwyn, Brookmans Park and Cuffley,

4.30 Apart from **BrP1** (moderate harm) all the sites would all result in 'moderate to high' harm to the Green Belt whereas the majority of the smaller sites result moderate harm or less. However **BrP12** is sequentially preferable to BrP1 in sustainability terms. Both sites would contribute to the five year land supply. However Brookmans Park has already met its proportionate share of the FOAHN for the plan period as has Welham

Green and Woolmer Green. The Inspector has indicated that such settlements would be exempt from the early review of the Plan.

- 4.31 Both Welwyn and Cuffley currently have allocations less than their proportionate share. The Inspector has expressed concern at the lack of housing in the submitted plan in the northern villages. The only remaining opportunities in the northern villages lie in Welwyn village which to date has had more completions than any of the other villages in the borough.
- 4.32 The sites in Welwyn require the construction of a new bridge over the River Mimram and the widening of the road and collectively would deliver 248 dwellings. The River Mimram is a chalk stream and objectors have expressed concern on the impact on the Mimram arising from new development and in particular the new bridge. The Environment Agency have raised no in principle objection stating that the design of the bridge can be left to the planning application stage. The two larger sites Wel1 and Wel2 are required to make this viable once these sites are allocated it is likely that Wel15 would come forward it might be possible to leave Wel6 in the Green Belt as it lies on the other side of the road. There is a pending Village Green application for Singlers Marsh which could impact on the deliverability of the highway improvements. These sites are more likely to deliver in years 6-10.
- 4.33 There would still be a shortfall in provision for the ten year period. The only opportunity for additional sites in Cuffley is Cuf15 which the Inspector has indicated should only come forward if an additional amount of new development is to come forward in Cuffley. This would deliver an additional 176 dwellings. This site is further from the station and shops than BrP12 in Brookmans Park. However BrP12 would only deliver 125 dwellings and is insufficient to make up the shortfall.
- 4.34 With the addition of the Welwyn and Cuffley sites the supply figure would increase by 424 dwellings giving a surplus of 28 dwellings. Table 6 sets out the additional sites associated with this target for making up the shortfall over the ten year period.

Table 6 Recommended Sites to meet the target associated with managing the shortfall over a ten year period

Settlement	LP / HELAA ref	Site	Dwellings
Woolmer Green	WGr3	Land adjacent to 52 London Road	25
O&MH	OMH9	Land to the rear of 19-23 The Avenue	25
Digswell	Dig1	Land east of New Road	80
Welwyn	Wel1	Land at Kimpton Road	178
Welwyn	Wel2	Land adj Wel Cemetery	40
Welwyn	Wel15	Fulling Mill Lane	14
Welwyn	Wel6	Land at Kimpton Road	16
Lemsford	StL13	Land at Roebuck Farm, Lemsford	30
Welham Green	WeG6	Skimpans Farm, Welham Green	73
Welham Green	WeG12	Pooleys Lane, Welham Green	83
Welham Green	WeG15	Potterells Farm, Welham Green	56
Brookmans Park	HS22 (BrP4) and Brp4a	Land West of Brookmans Park Station	428
Cuffley	HS29 (Cuf12)	Land North of Northaw Road East	73
Cuffley	HS30 (Cuf7)	Wells Farm, Northaw Road East	75
Cuffley	Cuf15	King George V playing Fields	176
Total			1,372

- 4.35 The settlement distribution that would result is set out in Table 7 and indicates that this is a more proportionate spread of dwellings relating to the Local Need Range. As with Table 5 windfall development is not included in these figures.

Table 7 Settlement Distribution

	Completions 1 Apr 2016 - 31 Mar 2022	Commitments (1st Apr 2022)	Allocations	Total	Local Need Range
WGC	1,416	251	4,257	5,924	1,464 – 6,797
Hatfield	853	230	2,607	3,690	995 - 4,621
Woolmer Green	76	0	209	285	43 - 201
O&MH	25	9	56	90	89 - 413
Welwyn	178	12	324	514	112 - 521
Digswell	12	20	80	112	47 - 219
Lemsford	0	0	30	30	7 - 30
Stanborough	17	2	0	19	9 - 41
Welham Green	12	1	528	541	96 - 445
Brookmans Park & Bell Bar	64	20	452	536	109 - 506
Little Heath	6	0	98	104	34 - 158
Cuffley	52	9	511	572	132 - 611
Rural Areas	20	165	0	185	137 - 635
Total	2,731	719	9,151	12,602	

Next Steps

- 4.36 The infrastructure requirements associated with different levels of growth have previously been assessed but the infrastructure section of the draft Local Plan will need to reflect the agreed strategy. The Infrastructure Delivery Plan will be amended as well to reflect the agreed strategy.
- 4.37 The Inspector has asked for a copy of the main modifications so that consultation can commence as soon as possible following the Members decision. Officers will amend the Main Modifications Schedule to set out the additional sites and any site specific criteria which would need to be taken into account along with other policies in the Plan when determining any planning application. These criteria were set out in the Site Selection Addendum reported to the January meeting of this Panel. The modifications will also need to be subject to Sustainability Appraisal.
- 4.38 The Policies set out in the Overarching Strategy relating to How Much Growth and the Settlement Strategy will need modifying to reflect the FOAHN, the level of growth met by site allocations and the need for an early review which would address the shortfall in the context of the planning system and the approach to housing numbers existing at the time the Review of the Local Plan is examined.
- 4.39 Consultation on the Main Modifications would need to run for 6 weeks. Officers anticipate this will take place in August and September. The representations would need to be forwarded to the Inspector and if any new substantive issues are raised which have not previously been considered by the examination there may be a

requirement for a further hearing session. Although such matters could be dealt with by written statements. The Inspector would need to issue his final report in the autumn which would then need to be considered by Full Council along with the final set of modifications required to make the Plan sound. The Council would need to allow for a six week legal challenge before it could formally adopt the Local Plan.

5 Legal Implications

- 5.1 The preparation of the Local Plan is governed by legislation, most notably the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011, as well as case law and secondary legislation set out in regulations. It also has to comply with relevant legislation relating to the preparation of Sustainability Appraisal and Habitats Regulatory Assessment.
- 5.2 The legislation requires that the Local Plan is prepared in accordance with the Local Development Scheme (LDS), the Statement of Community Involvement (SCI) and, under the transitional arrangements, the 2012 version of the National Planning Policy Framework (NPPF).
- 5.3 The legislation requires that local planning authorities seek to deliver sustainable development when preparing the plan.
- 5.4 The NPPF sets out the Tests of Soundness against which the Local Plan is examined. That is that the plan is positively prepared, justified, effective and consistent with national policy.
- 5.5 The Inspector has made it clear that only he can remove sites from the Submitted Local Plan if he considers them to be unsound. Should Members no longer wish to proceed with all the sites considered to be sound in the submitted plan the only option would be for the Council to withdraw the Plan and start again.
- 5.6 The Council can only lawfully adopt the Local Plan if the Examining Inspector finds it “sound” and only in the form which the Inspector has found it sound (i.e. the Council would not be able to make material changes to the version of the Plan which the Inspector has found sound). Should the Inspector find the Plan to be unsound the Council would be unable to adopt the Plan and, in this eventuality, the Council would not have an up-to-date Plan.
- 5.7 Whilst it would be open to the Council to bring a case in court to challenge the validity of the Inspector’s conclusions it is unlikely that such a challenge would succeed as the court intervenes only in clear cases of legal error. Given that the decision whether a Plan is “sound” is, inherently, one of planning judgment the courts heavily incline to leaving things in the hands of the examining inspector.
- 5.8 The Local Plan process could be subject to legal challenge if any party considers that it has not been prepared in accordance with legislation and national guidance.

6 Financial Implications

- 6.1 The financial implications of not having a sound Local Plan is that the Council would have to start the process again. This would require updated evidence, another call-for-

sites exercise, updated site appraisal, updated sustainability appraisal and habitats assessment and further public consultation.

- 6.2 In the meantime the Council is likely to continue to receive speculative planning applications for both urban and green belt sites (both those that are currently favoured in the plan and those that have been rejected) and could face costs if these were successfully appealed and the Council was held to have acted unreasonably.

7 Risk Management Implications

- 7.1 The Inspector has made it clear that unless the Council adds in more sites to the Local Plan it will be found unsound. He has also made it clear that decisions upon which sites to add into the Plan need to be based on sound planning grounds which are applied consistently and transparently.
- 7.2 The current adopted District Plan is considered to be out-of-date, particularly with regard to policies relating for new residential development. If this Plan is withdrawn or found unsound then the Council would have to rely on policies in the NPPF for decision making. Emerging policies in the Local Plan would no longer have any weight in decision making.
- 7.3 Without an adopted Local Plan the Council's five year land supply figures will continue to be based on the Government's standard methodology, which is currently 888 homes per year. Because the Council no longer has a five year land supply the presumption in favour of sustainable development already applies. As a consequence, policies seeking to protect areas from residential development would carry less weight and the Council is more likely to lose decisions on appeal. This will impact on the Council's performance figures, which could place it at risk of government intervention.
- 7.4 The Housing Delivery Test results in a requirement for a 20% buffer being added to the five year land supply figures. In future years, without an adopted plan, it is likely that performance will fall below 45%, resulting in a risk of special measures.
- 7.5 Regulations now require a plan to be reviewed every five years and particularly where there are significant changes in the housing need figure. Paragraph 74 of the NPPF 2021 states:

"The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5 % to ensure choice and completion in the market for land; or*
- b) 10 % where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement **OR recently adopted plan** (Footnote 40), to account for any fluctuations in the market during that year; or*
- c) 20 % where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply (Footnote 41)".*

Footnote 40 states: *"For the purposes of paragraphs 74b and 75 a plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of*

the following year; and a plan adopted between 1 November and 30 April will be considered 'recently adopted' until 31 October in the same year".

Footnote 41 states: "This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85 % of the housing requirement".

- 7.6 Should housing completions not increase the Council will come under pressure to carry out an immediate review of the Local Plan. Members should note how short the period is for an up-to-date adopted plan to count towards a five year housing land supply figure. New demographic and household projections are published every two years. The results of the 2021 census will also be used to inform projections in the future.
- 7.7 Members should also note that because the plan is being examined against the 2012 NPPF it may, once adopted, need to be updated to bring it in line with the 2021 NPPF. Wherever possible Officers will seek to ensure there is not likely to be a conflict.
- 7.8 In proposing modifications to the plan, the Council has to ensure that it has not proposed so many changes that it is, in essence, a different plan, which even if found sound might make it subject to legal challenge. Nevertheless, the Council is allowed to make changes to make the plan sound and these must by definition be substantive otherwise they would not be needed to make the plan sound. Substantive changes which are not required to make the plan sound cannot be made.

8 Security & Terrorism Implications

- 8.1 There are no security and terrorism implications arising from this report.

9 Procurement Implications

- 9.1 There are no procurement implications arising from this report.

10 Climate Change Implications

- 10.1 There are climate change implications arising from the identification of land for housing and employment. The Sustainability Appraisal judges that there will be greater energy use and emissions of greenhouse house gases and reductions in air quality.
- 10.2 The effects of this will be mitigated through the implementation of policies in the plan on sustainable design and construction and delivering sustainable development.
- 10.3 Minimising the need to travel by locating development in accessible locations close to a range of facilities and services and/or where they are close to public transport and cycle paths will assist in this or, alternatively, requiring through Section 106 or Community Infrastructure Levy (CIL) to improvements to public transport infrastructure, cycleways and footpaths.
- 10.4 Ensuring the balance of employment provision alongside housing will also help to address this.

11 Link to Corporate Priorities

- 11.1 The subject of this report is linked to the Council's Business Plan 2018-21 and, in particular, Priority 3 Our Housing - to plan for current and future needs and Priority 4 Our Economy – sustainable growth.

12 Health and Wellbeing Implications

- 12.1 Providing sufficient housing and jobs have health and wellbeing benefits for residents as does the quality of the environment.

13 Human Resources Implications

- 13.1 Should the Council decide to progress with Main Modifications the Council will need to ensure the policy team is fully staffed to meet the timetable. The Local Plan will continue to be prepared by the policy team. Regardless of whether the Plan is found sound, withdrawn or found unsound, it is likely to increase the number of planning applications and the caseload for development management officers.

14 Communications and Engagement Implications

- 14.1 Officers will work closely with communications colleagues to ensure that Local Plan progress is communicated to the public through newsletters, information on the website, press briefings, etc.
- 14.2 Public consultation has been carried out in accordance with the Statement of Community Involvement.

15 Equality and Diversity Implications

- 15.1 All of the policies in the Submitted Local Plan were subject to equality impact assessment.
- 15.2 Any policies which are subsequently proposed for main modification will be subject to an updated equality impact assessment.

Author

Sue Tiley, Planning Policy and Implementation Manager

July 2022

Appendices

Appendix A – Schedule of Sites
Appendix B – Maps of potential sites by settlement
Appendix C – Housing Trajectory of All Sites
Appendix D – Housing Requirement Note
Appendix E – Census (2021) Note on first results
Appendix F - Draft Main Modifications (Topic Policies)

Background Documents

Committee papers for Cabinet Planning and Parking Panel 13th January 2021

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Appendix A Schedule of Sites

Summary Tables

Option to meet Liverpool Approach (making up shortfall over years 1-13)	Total Supply	Total Years 1-10	Total Years 1-5
Completions 2016-22	2,731	0	0
Estimated completions 22/23	613	0	0
Commitments	486	486	462
Windfall	1,529	1,112	417
Small Sites	13	13	5
Agreed Sound Sites July 2022 (Table 1)	7,403	6,906	4,408
Sub-total	12,775	8,517	5,292
Proposed Additional Sites (Table 5)	948	948	520
Total	13,723	9,465	5,812

Option to meet Alternative Approach (making up shortfall in years 6-10)	Total Supply	Total Years 1-10	Total Years 1-5
Completions 2016-22	2,731	0	0
Estimated completions 22/23	613	0	0
Commitments	486	486	462
Windfall	1,529	1,112	417
Small Sites	13	13	5
Agreed Sound Sites July 2022 (Table 1)	7,403	6,906	4,408
Sub-total	12,775	8,517	5,292
Proposed Additional Sites (Table 6)	1,372	1,372	620
Total	14,147	9,889	5,912

Table 1: Member agreed Sites - January 2022

Settlement	HELAA Ref	LP Ref	Site	Jan 2022	July 2022	Change	22/23	Years 1-13	Years 1-10	Years 1-5	Reason for Capacity Change
WGC	WGC4/4a	SDS1	North east of WGC	845	872	27		872	872	612	To reflect total of the outline planning permission granted for 650 dwellings + 6 gypsy and traveller pitches at WGC4 and the submitted planning application for 210 dwellings + 6 gypsy and traveller pitches at WGC4a.
WGC	WGC5	SDS2	South east of WGC	600	600	0		600	600	400	
WGC	Pea02b	SDS3/4	Broadwater Road West (N)	2,003	1,403	-600	208	1,195	1,195	787	1,403 reflects capacity from approved scheme. Total capacity expected to come forward by year 10, 208 expected to complete in 2022/23.
WGC	Pea02c	SDS3/4	Broadwater Road West (SW) - Pall Mall	171	171	0		171	171	0	
WGC	Han40	MUS1	WGC Town Centre North	100	100	0		100	100	0	
WGC	Pan01b	HS1	Land at Bericot Way (N)	0	0	0		0	0	0	

Settlement	HELAA Ref	LP Ref	Site	Jan 2022	July 2022	Change	22/23	Years 1-13	Years 1-10	Years 1-5	Reason for Capacity Change
WGC	WGC1	HS2	Creswick	300	340	40		340	340	340	To reflect submitted planning application.
WGC	Pea08	HS3	80 Bridge Road East	32	32	0		32	32	0	
WGC	Hal03	HS4	Ratcliff Tail Lift Site	110	59	-51	30	29	29	29	Site now partially complete +51 completions included in 2016-2022 completions figure. 30 expected to complete in 22/23.
WGC	Hol19	HS5	Hyde Valley House, Hyde Valley	17	13	-4		13	13	13	To reflect planning permission (6/2021/1388/RM).
WGC	Han91	HS6	Land at Gosling Sports Park	100	100	0		100	100	0	
WGC	Pea24	HS8	St Michaels House, Holwell Road	22	22	0		22	0	0	
WGC	Han40a		Town Centre North- Campus East	250	250	0		250	250	250	
WGC	Pea102	SDS3/4	Bio Park, Broadwater Rd	250	250	0		250	250	250	
WGC	Pea104		YMCA, 90 Peartree Lane	15	29	14		29	29	29	To reflect submitted planning application (approved subject to s106).
WGC	Hol23		Neighbourhood Centre, Hollybush Lane	16	16	0		16	16	0	
Hatfield	Hat1	SDS5	North West Hatfield	1,750	1,750	0		1,750	1,275	400	
Hatfield	HC100b	MUS2	1-9 Town Centre	71	71	0		71	71	71	
Hatfield	HW100	MUS3	High view (Hilltop) SPD Site	140	140	0	36	104	104	104	36 expected to complete in 2022/23.
Hatfield	HE80	HS9	Land at Onslow St Audrey's School	86	86	0	6	80	80	80	6 expected to complete in 22/23.
Hatfield	HS31	HS10	Garages at Hollyfield	12	10	-2		10	10	10	Reduced to reflect lower capacity in submitted planning application.
Hatfield	Hat11	HS11	Land at Southway	120	120	0		120	120	120	
Hatfield	HS91	HS13	Land S of Filbert Close	37	39	2		39	39	39	To reflect planning application.
Hatfield	HE23	HS14	L Kahn Manufacturing, Wellfield Road	62	62	0		62	62	0	
Hatfield	HC11		Meridian House, The Common	11	11	0		11	11	11	
Hatfield	HE17		Link Drive (Site F)	80	80	0		80	80	80	

Settlement	HELAA Ref	LP Ref	Site	Jan 2022	July 2022	Change	22/23	Years 1-13	Years 1-10	Years 1-5	Reason for Capacity Change
Hatfield	HC08		Lemsford Road (Site H)	32	32	0		32	32	32	
Hatfield	HSW92		Minster Close	49	91	42	91	0	0	0	Demolitions of -41 included in 2016-2022 completions. Additional 1 granted permission. Net total at this site will be 50.
Hatfield	HSW94		College Lane	115	115	0		115	115	0	
Woolmer Gr	WGr1	HS15	Land east of London Road	150	150	0		150	150	150	
Woolmer Gr	WE100		51-53 London Road	34	34	0		34	34	0	
O&MH	OMH8	HS16/17	2 Great North Road	5	5	0		5	5	0	
O&MH	OMH5	HS16/17	Land rear of 2a-12 Great North Road	20	20	0		20	20	20	
O&MH	GTLAA04	HS32	Four Oaks, Gt North Rd	6	6	0		6	6	6	
Welwyn	Wel11	HS18	The Vineyards	30	30	0		30	30	30	
Welwyn	Wel4	HS19	Sandyhurst, The Bypass	30	37	7		37	37	37	To reflect planning application.
Welwyn	Wel3	HS20	School Lane	9	9	0		9	9	9	
Wel Green	WeG4b	SDS7	Marshmoor	100	100	0		100	100	100	
Wel Green	GTLAA01	HS35	Foxes Lane, Dixons Hill Rd	12	12	0		12	12	12	
Wel Green	WeG1		51 Welham Manor	16	16	0		16	16	16	
Wel Green	WeG3a		Land South of Wel Manor	68	68	0		68	68	68	
Wel Green	WeG10		Dixons Hill Road	120	120	0		120	120	0	
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	14	14	0		14	14	14	
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	10	10	0		10	10	10	
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	35	35	0		35	35	35	
Little Heath	LHe4/5		Part of Studlands/Videne	36	63	27		63	63	63	Increased to reflect larger site following Inspectors conclusion on Green Belt boundary.

Settlement	HELAA Ref	LP Ref	Site	Jan 2022	July 2022	Change	22/23	Years 1-13	Years 1-10	Years 1-5	Reason for Capacity Change
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	5	6	1	6	0	0	0	Demolitions of -1 included in 2016-2022 completions. Net total at this site remains 5.
Cuffley	Cuf1	HS27	Land at The Meadway	60	60	0		60	60	60	
Cuffley	Cuf6	HS28	Land south of Northaw Road East	121	121	0		121	121	121	
Total				8,277	7,780	-497		7,403	6,906	4,408	

Table 2: Submitted Sound Sites

Settlement	HELAA Ref	Local Plan Ref	Site	Capacity	Years 1-10	Years 1-5
Brookmans Park	HS22	HS22	Land West of Brookmans Park Station	300	300	0
Cuffley	HS29	HS29	Land North of Northaw Road East	73	73	73
Cuffley	HS30		Wells Farm, Northaw Road East	75	75	75
Total				448	448	148

Table 2a Expanded site

Settlement	HELAA Ref	Local Plan Ref	Site	Capacity	Years 1-10	Years 1-5
Brookmans Park	BrP4+4a	HS22	Land West of Brookmans Park Station	428	428	0

Table 3: Small Sites

Settlement	HELAA Ref	Local Plan Ref	Site	Capacity	Years 1-10	Years 1-5
Woolmer Green	WGr3		Land west London Road	25	25	25
O&MH	OMH9		Land to the rear of 19-23 The Avenue	25	25	25
Digswell	Dig1		Land east of New Road	80	80	80
Lemsford	StL13		Land at Roebuck Farm	30	30	30
Stanborough	StL15		East of Great North Road	8	8	8
Stanborough	StL1		North of New Road	90	90	90
Welham Green	WeG12		Land N of Pooleys Lane	45/83	45/83	45/83
Welham Green	WeG6		Skimpans Farm	73	73	73
Welham Green	WeG15		Land at Potterells Farm	56	56	56
Total				432/470	432/470	432/470

Table 4: Remaining/Large Sites

Settlement	HELAA Ref	Local Plan Ref	Site	Capacity	Years 1-10	Years 1-5
Welwyn	Wel1		Land at Kimpton Road	178	178	0
Welwyn	Wel2		Land adj Wel Cemetery	40	40	0
Welwyn	Wel15		Fulling Mill Lane	14	14	0
Welwyn	Wel6		Land at Kimpton Road	16	16	0
Brookmans Park	BrP1		Upper Bell Lane	104	104	104
Brookmans Park	BrP12		Land North of Peplins Way	125	125	125
Cuffley	Cuf15		King George V Playing Fields	176	176	100
Total				653	653	329

Table 5: Recommended additional Sites to meet Liverpool Approach

Settlement	HELAA Ref	Local Plan Ref	Site	Capacity	Years 1-10	Years 1-5
Woolmer Green	WGr3		Land adjacent to 52 London Road	25	25	25
O&MH	OMH9		Land to the rear of 19-23 The Avenue	25	25	25
Digswell	Dig1		Land east of New Road	80	80	80
Lemsford	StL13		Land at Roebuck Farm, Lemsford	30	30	30
Welham Green	WeG6		Skimpans Farm, Welham Green	73	73	73
Welham Green	WeG12		Pooleys Lane, Welham Green	83	83	83
Welham Green	WeG15		Potterells Farm, Welham Green	56	56	56
Brookmans Park	BrP4/4a	HS22	Land West of Brookmans Park Station	428	428	0
Cuffley	Cuf12	HS29	Land North of Northaw Road East	73	73	73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	75	75	75
Total				948	948	520

Table 6: Recommended additional sites to meet the target which makes up the shortfall over a 10 year period (alternative approach).

Settlement	HELAA Ref	Local Plan Ref	Site	Capacity	Years 1-10	Years 1-5
Woolmer Green	WGr3		Land adjacent to 52 London Road	25	25	25
O&MH	OMH9		Land to the rear of 19-23 The Avenue	25	25	25
Welwyn	Wel1		Land at Kimpton Road	178	178	0
Welwyn	Wel2		Land adj Wel Cemetery	40	40	0
Welwyn	Wel15		Fulling Mill Lane	14	14	0
Welwyn	Wel6		Land at Kimpton Road	16	16	0
Digswell	Dig1		Land east of New Road	80	80	80
Lemsford	StL13		Land at Roebuck Farm, Lemsford	30	30	30
Welham Green	WeG6		Skimpans Farm, Welham Green	73	73	73
Welham Green	WeG12		Pooleys Lane, Welham Green	83	83	83
Welham Green	WeG15		Potterells Farm, Welham Green	56	56	56
Brookmans Park	BrP4/4a	HS22	Land West of Brookmans Park Station	428	428	0
Cuffley	HS29	Cuf12	Land North of Northaw Road East	73	73	73
Cuffley	HS30	Cuf7	Wells Farm, Northaw Road East	75	75	75
Cuffley	Cuf15		King George V playing Fields	176	176	100
	Total			1,372	1,372	620

Appendix B – Settlement Maps

The following sites are listed in Tables 2, 2a, 3 and 4 of Appendix A Housing Supply.

Settlement	LP / HELAA ref	Site	Dwellings
Woolmer Green	WGr3	Land adjacent to 52 London Road	25
O&MH	OMH9	Land to the rear of 19-23 The Avenue	25
Digswell	Dig1	Land east of New Road	80
Welwyn	Wel1	Land at Kimpton Road	178
Welwyn	Wel2	Land adj Wel Cemetery	40
Welwyn	Wel15	Fulling Mill Lane	14
Welwyn	Wel6	Land at Kimpton Road	16
Lemsford	StL13	Land at Roebuck Farm, Lemsford	30
Stanborough	StL15	East of Great North Road	8
Stanborough	StL1	North of New Road	90
Welham Green	WeG6	Skimpans Farm, Welham Green	73
Welham Green	WeG12	Land N of Pooleys Lane	83
Welham Green	WeG15	Land at Potterells Farm	56
Brookmans Park	HS22 (BrP4) and Brp4a	Land West of Brookmans Park Station	428
Brookmans Park	BrP1	Upper Bell Lane	104
Brookmans Park	BrP12	Land North of Peplins Way	125
Cuffley	HS29 (Cuf12)	Land North of Northaw Road East	73
Cuffley	HS30 (Cuf7)	Wells Farm, Northaw Road East	75
Cuffley	Cuf15	King George V playing Fields	176

The location of each site is shown in the corresponding settlement plan, alongside the Member agreed sites (January 2022) within the settlement

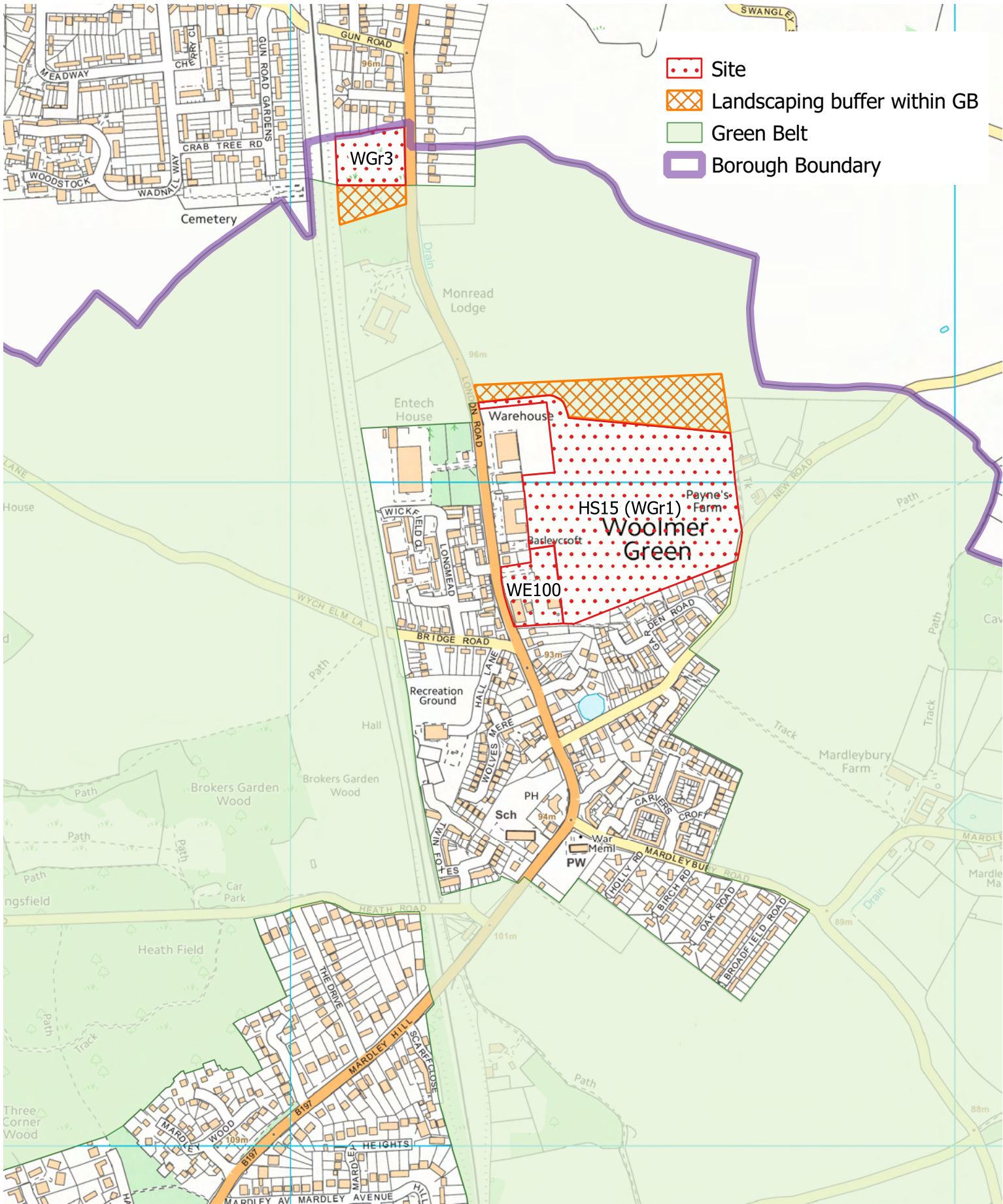

- Woolmer Green
- Oaklands and Mardley Heath
- Digswell
- Welwyn
- Lemsford
- Stanborough
- Welham Green
- Brookmans Park
- Cuffley

Some sites include a corresponding landscaping buffer beyond the allocation and within the Green Belt. Landscaping buffers are only shown for the sites where these have been worked through, other sites will also have a landscape buffer. The shown landscape buffers are illustrative currently.

The Council's general approach to treatment of Green Belt boundaries is set out in [EX223](#) and identifies that as a general rule, the tree-planting and other strategic landscaping needed to strengthen the green belt boundary will take place adjoining but outside the development allocation, and within the green belt.

The additional site's put forward to the Examination to meet the FOAHN will include corresponding site specific considerations, including details on the treatment of the green belt boundary, this will be set out as Main Modifications and subject to consultation.

The purpose of the following settlement plans is to show the location of the sites referred to in the CPPP paper of 21st July 2022.

**WELWYN
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Title:
Woolmer Green Policies Map

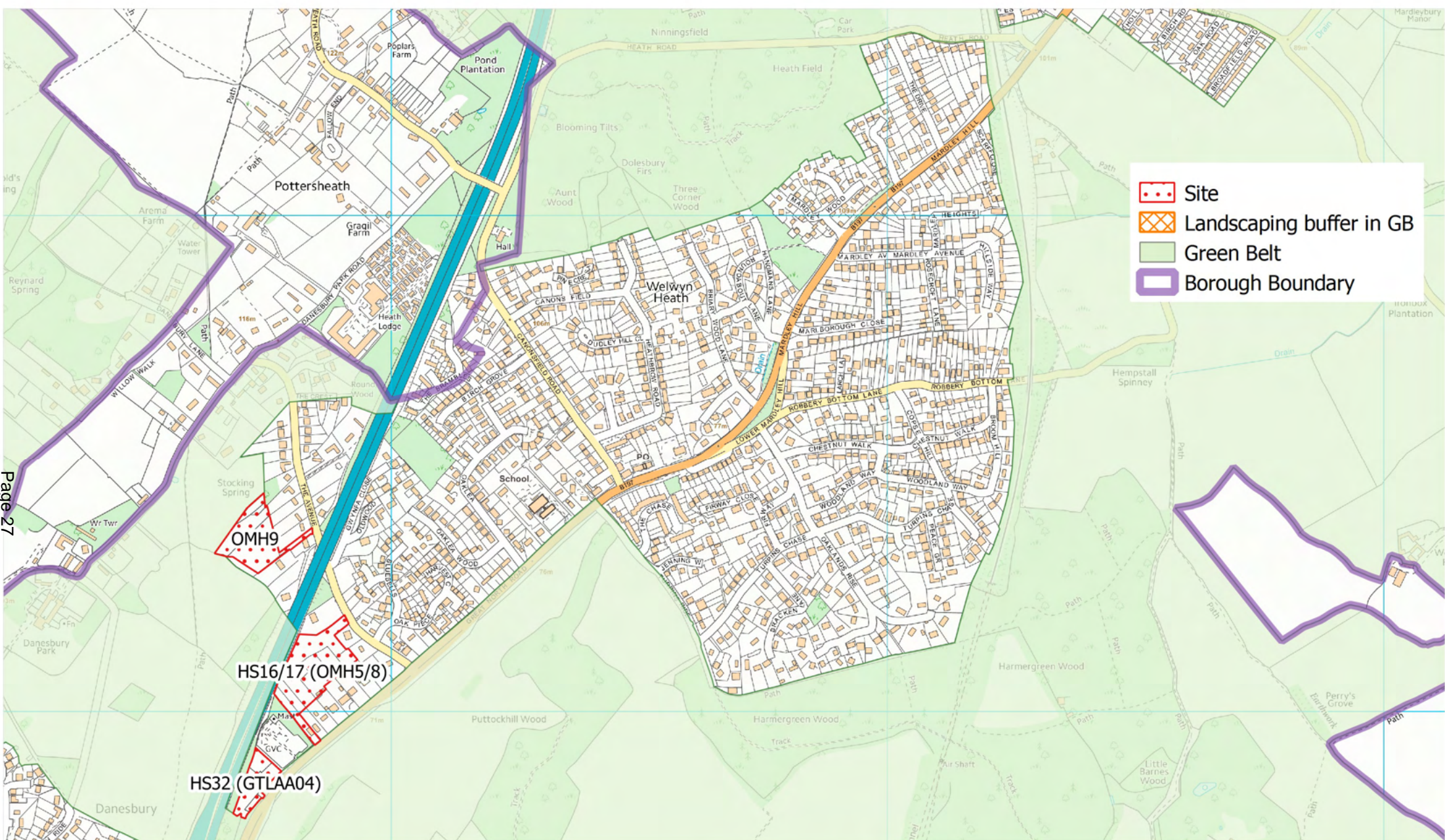
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Date:
12-07-2022

Project:
Draft Local Plan

Drawing Number:

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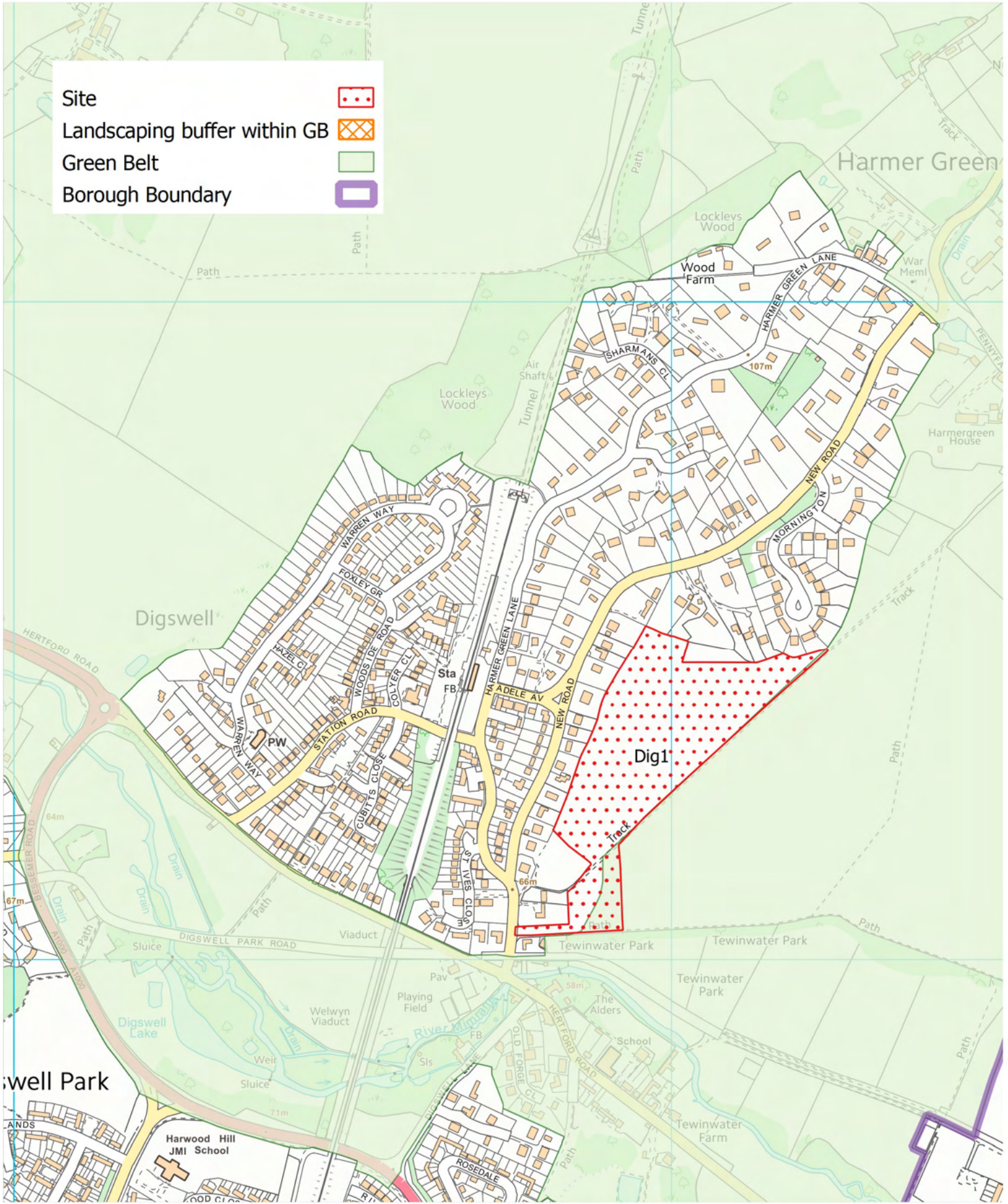



Page 27



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Title: Oaklands & Mardley Heath Policies Map	Scale: NTS	Notes:
	Date: 13-07-2022	
	Project: Draft Local Plan	
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**WELWYN
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Council Offices, The Campus
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Title: Digswell Policies Map

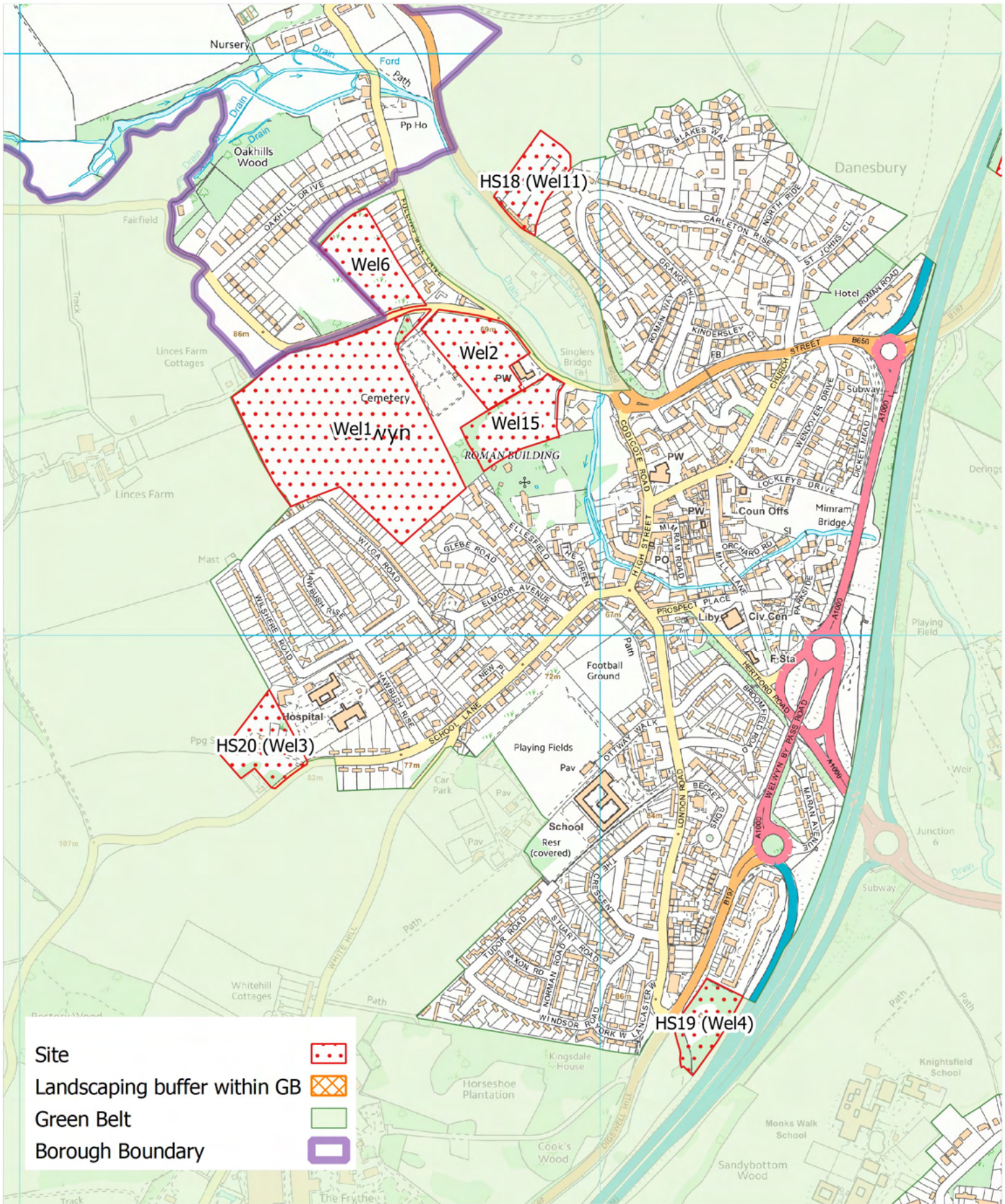

Project: Draft Local Plan

Scale: NTS

Date: 13-07-2022

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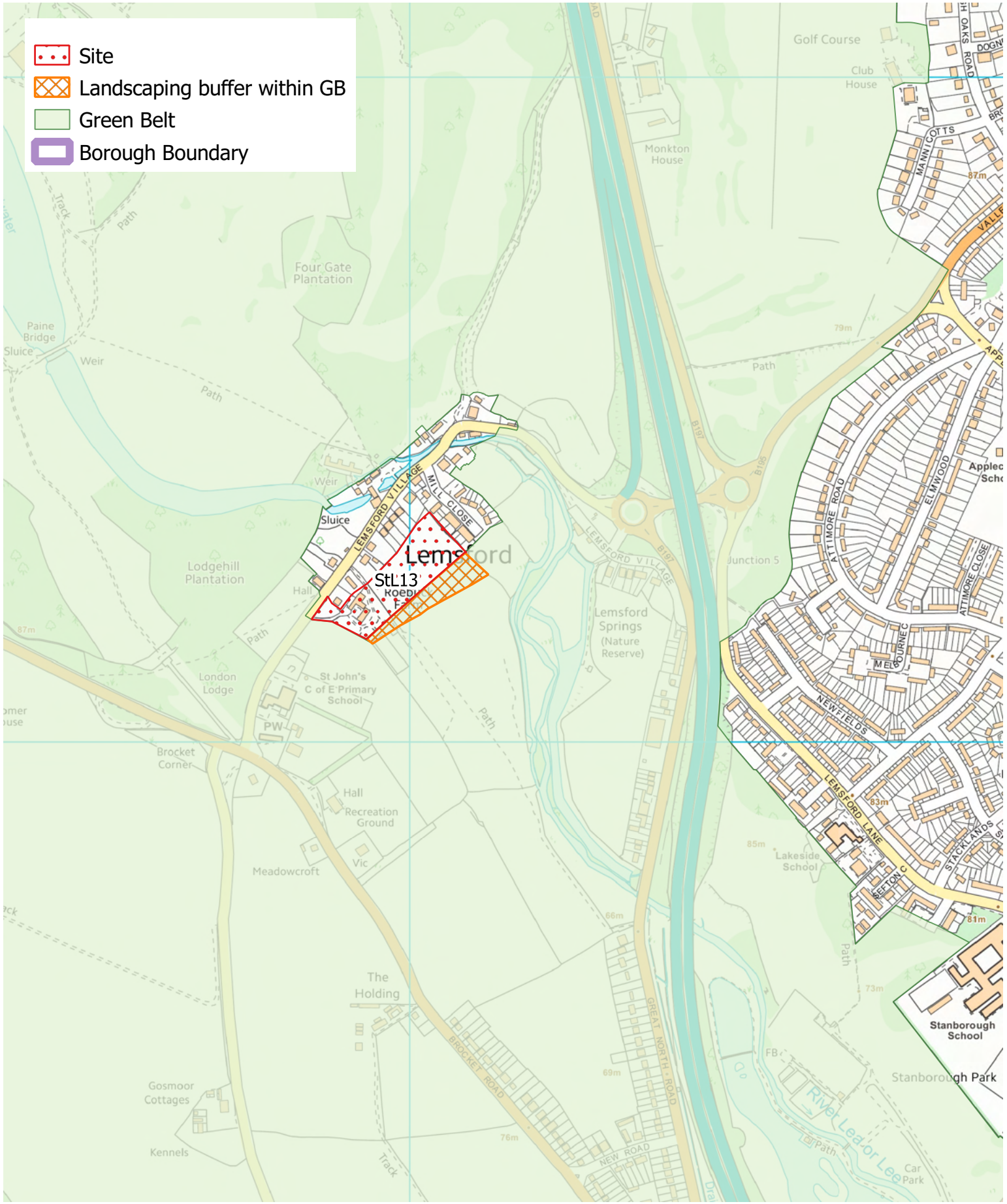

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Title: Welwyn Policies Map		Scale: NTS
Project: Draft Local Plan		Date: 13-07-2022
Drawing Number:		Drawn:
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**WELWYN
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Welwyn Garden City, Herts, AL8 6AE

Title: **Lemsford Policies Map**

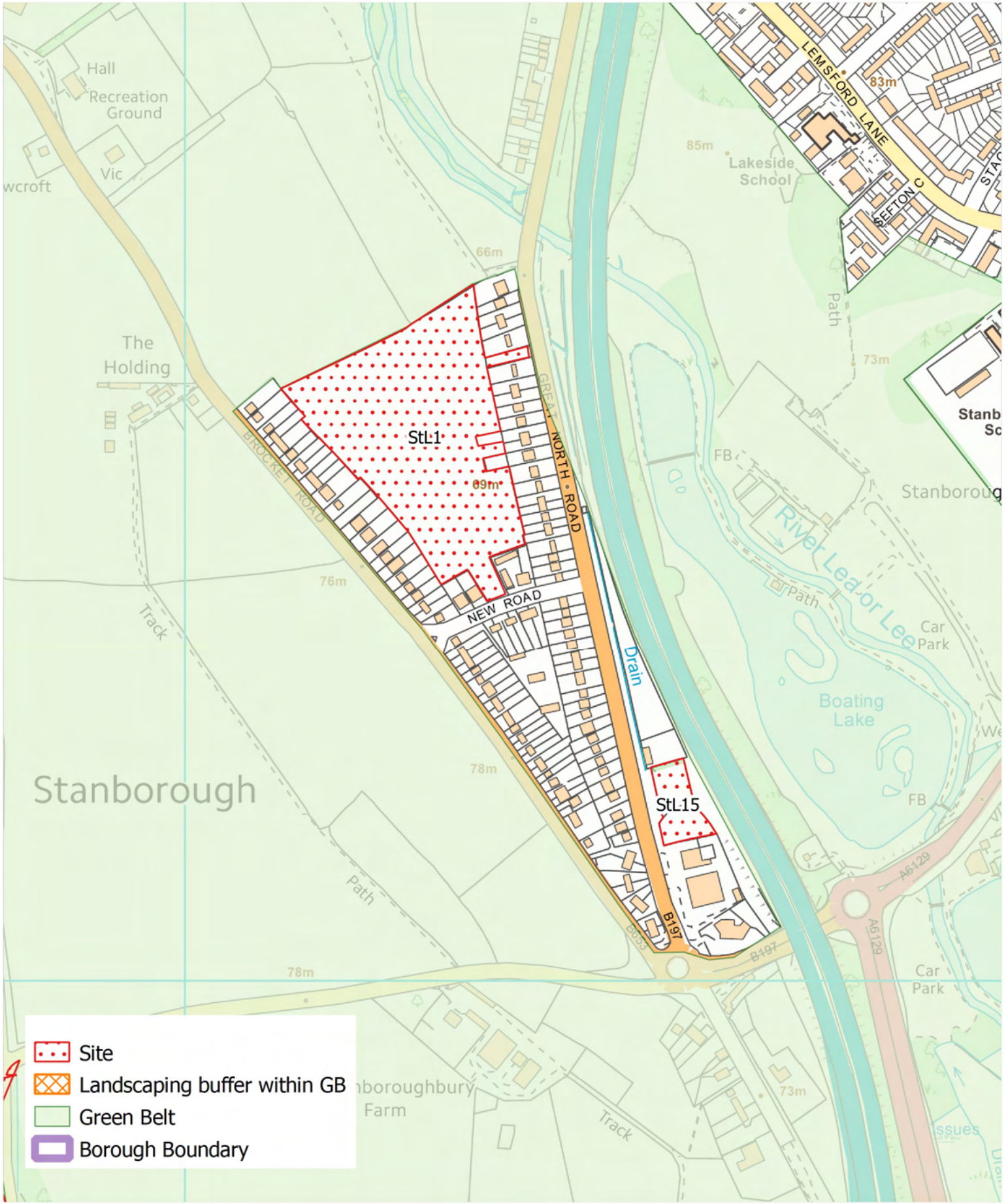
Project: **Draft Local Plan**





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Date: **12-07-2022**

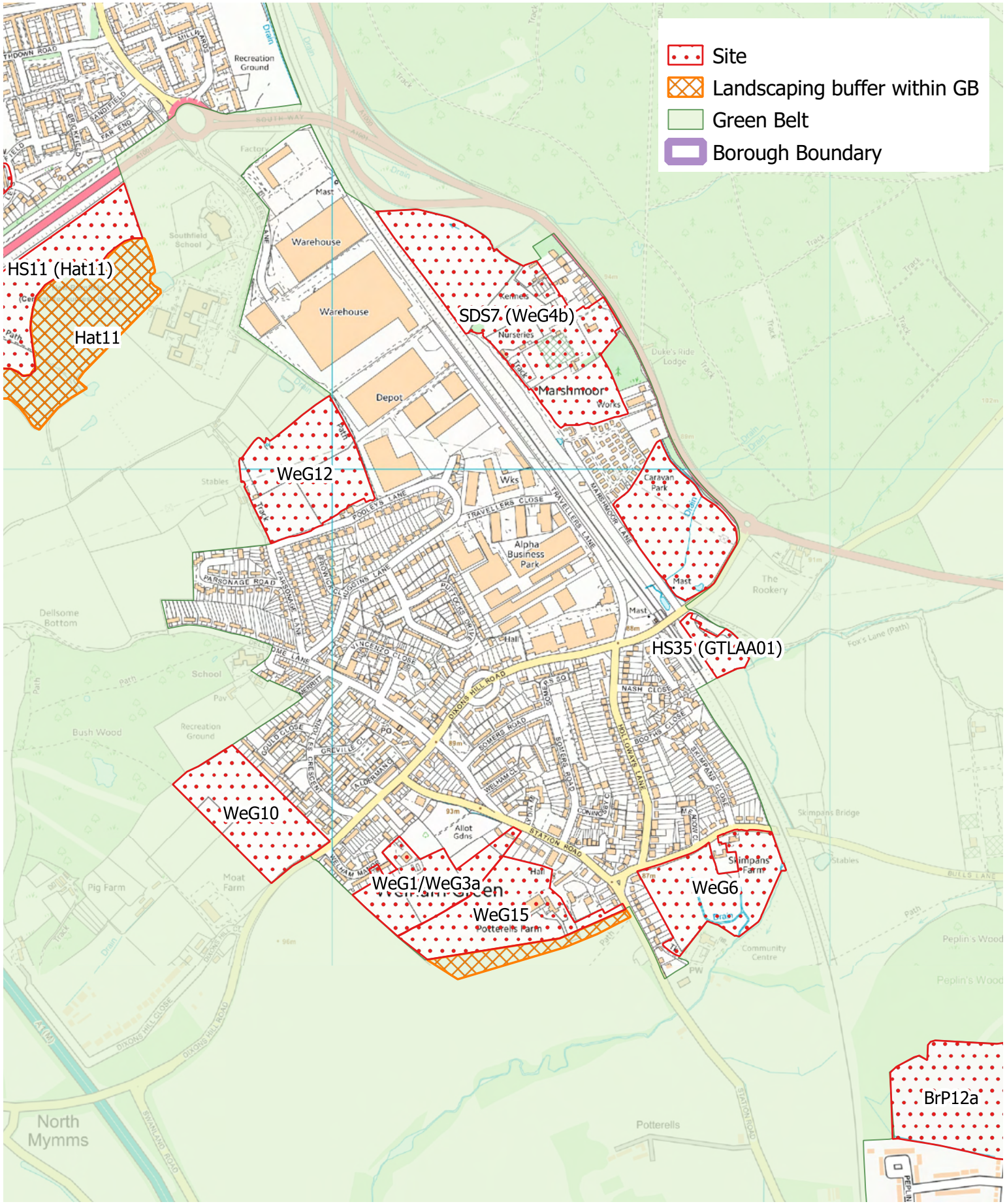

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-  Site
-  Landscaping buffer within GB
-  Green Belt
-  Borough Boundary

 <p>WELWYN HATFIELD</p> <p>Council Offices, The Campus Welwyn Garden City, Herts, AL8 6AE</p>	Title: Stanborough Policies Map		Scale: NTS
	Project: Draft Local Plan		Date: 13-07-2022
	Drawing Number:		Drawn:
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**WELWYN
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Title:
Welham Green Policies Map

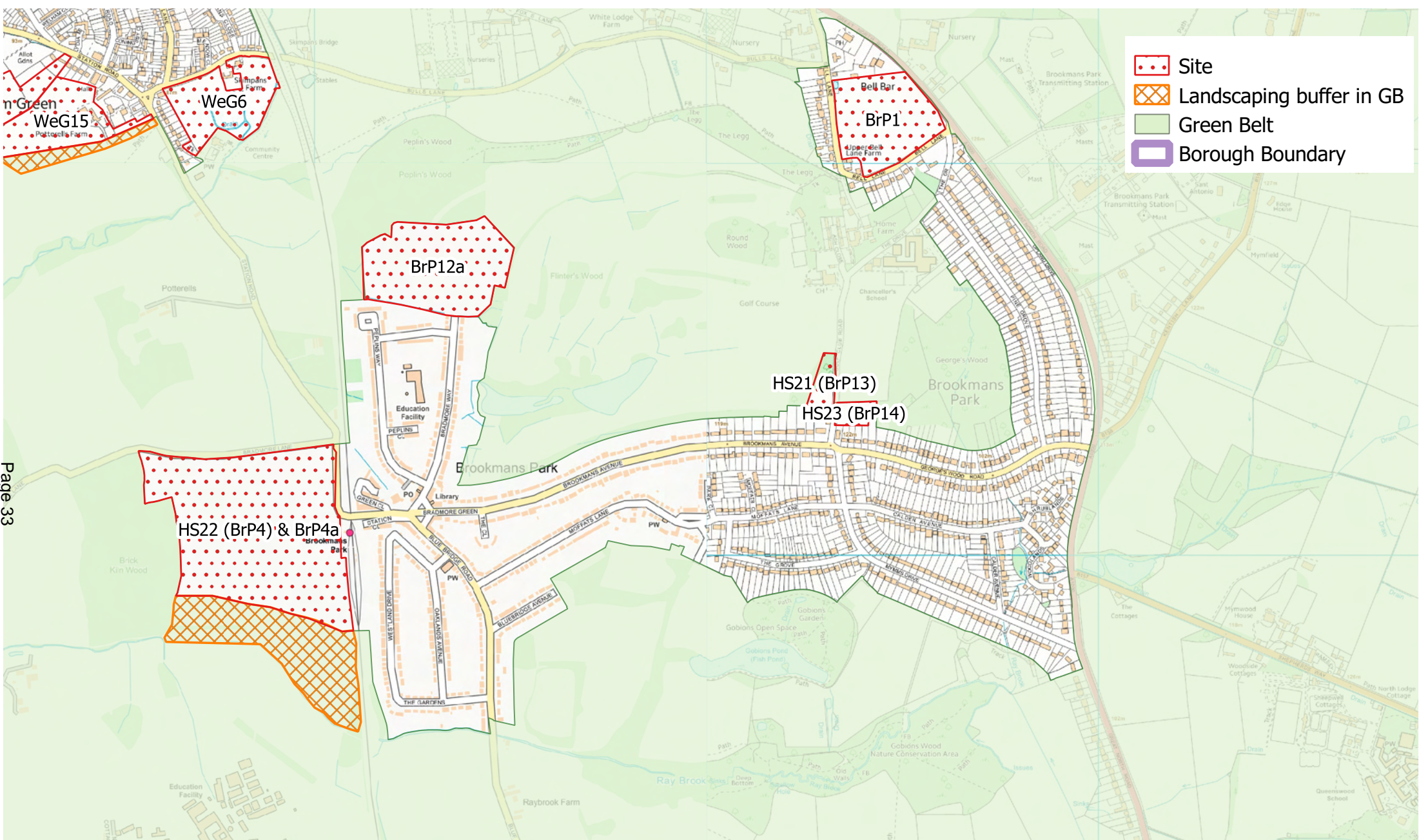
Project:
Draft Local Plan

Drawing Number:

Scale:
NTS

Date:
12-07-2022

Drawn:

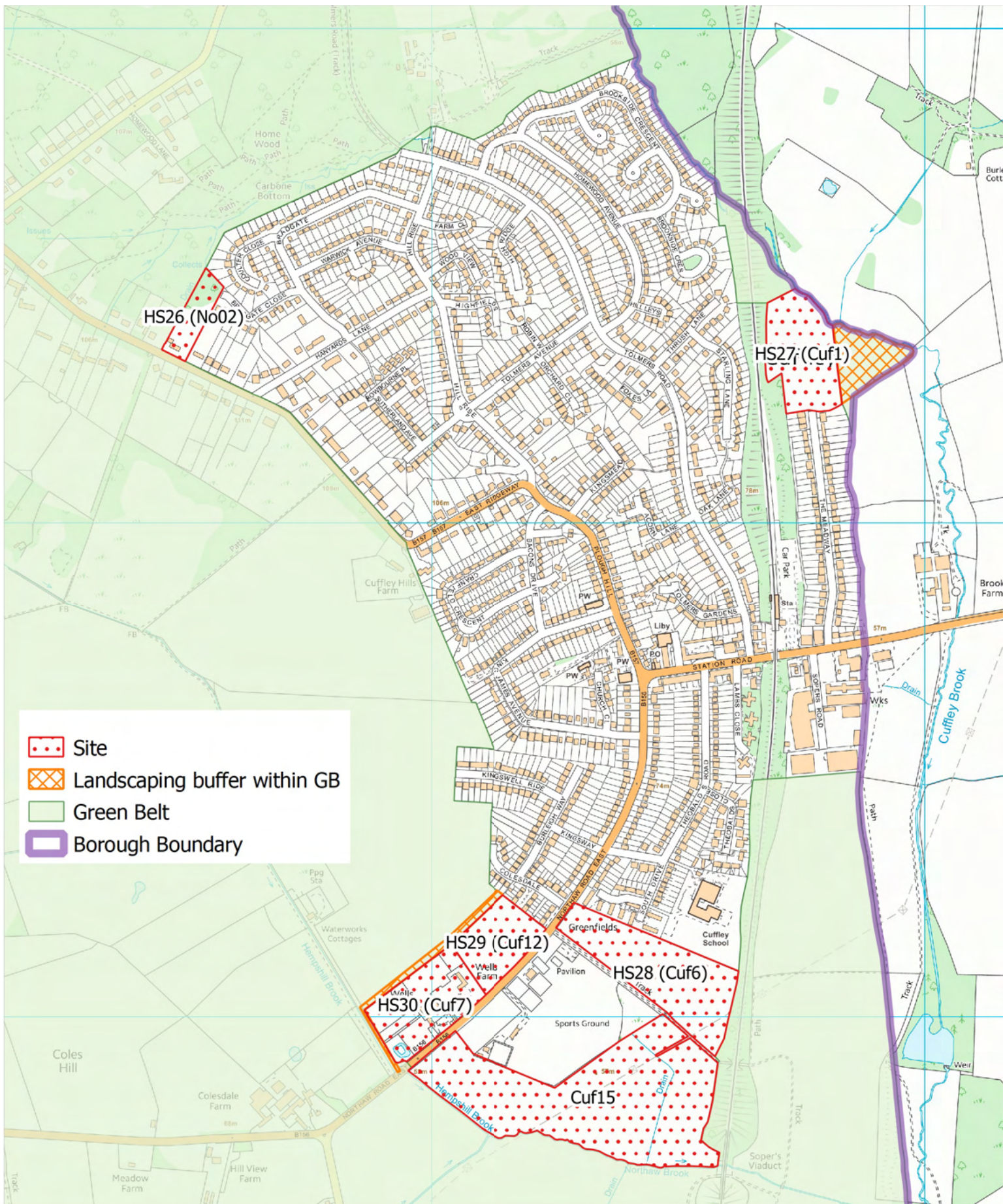






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Council Offices, The Campus
Welwyn Garden City, Herts, AL8 6AE

Title: Bell Bar and Brookmans Park Policies Map	Scale: NTS	Notes:
	Date: 12-07-2022	
Project: Draft Local Plan	Drawn:	
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-  Site
-  Landscaping buffer within GB
-  Green Belt
-  Borough Boundary



**WELWYN
HATFIELD**

Council Offices, The Campus
Welwyn Garden City, Herts, AL8 6AE

Title: Cuffley Policies Map		Scale: NTS
Project: Draft Local Plan		Date: 13-07-2022
Drawing Number:		Drawn:
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Scale: NTS
Date: 13-07-2022
Drawn:

Appendix C – Housing Trajectory – All Sites

Supply/Site	Current Year	1	2	3	4	5	6	7	8	9	10	11	12	13	Total plan period
	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	
Completions (16/17-21/22)															2,731
Commitments	233	261	119	89		-7	24								719
Windfall				139	139	139	139	139	139	139	139	139	139	139	1,529
Small Sites	3		5							8					16
WGC4/4a (SDS1) - North east of WGC, WGC			150	150	162	150	140	120							872
WGC5 (SDS2) - South east of WGC, WGC				100	150	150	100	100							600
Pea02b (SDS3/4) - Broadwater Road West (N), WGC	208		100	226	226	235	138	135	135						1,403
Pea02c (SDS3/4) - Broadwater Road West (SW) - Pall Mall, WGC										95	76				171
Han40 (MUS1) - WGC Town Centre North, WGC							33	34	33						100
Pan01b (HS1) - Land at Bericot Way (N) , WGC															0
WGC1 (HS2) - Creswick, WGC			70	90	90	90									340
Pea08 (HS3) - 80 Bridge Road East, WGC							16	16							32
Hal03 (HS4) - Ratcliff Tail Lift Site, WGC	30	29													59
Hol19 (HS5) - Hyde Valley House, Hyde Valley, WGC		13													13
Han91 (HS6) - Land at Gosling Sports Park, WGC								50	50						100
Pea24 (HS8) - St Michaels House, Holwell Road, WGC												11	11		22
Han40a - Town Centre North-Campus East, WGC			50	100	100										250
Pea102 (SDS3/4) - Bio Park, Broadwater Rd, WGC				100	150										250
Pea104 - YMCA, 90 Peartree Lane, WGC		29													29
Hol23 - Neighbourhood Centre, Hollybush Lane, WGC										16					16

Supply/Site	Current Year	1	2	3	4	5	6	7	8	9	10	11	12	13	Total plan period
	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	
Hat1 (SDS5) - North West Hatfield, Hatfield				100	150	150	150	175	175	200	175	175	150	150	1,750
HC100b (MUS2) - 1-9 Town Centre, Hatfield		71													71
HW100 (MUS3) - High view (Hilltop) SPD Site, Hatfield	36	36	42	26											140
HE80 (HS9) - Land at Onslow St Audrey's School, Hatfield	6	37	43												86
HS31 (HS10) - Garages at Hollyfield, Hatfield		10													10
Hat11 (HS11) - Land at Southway, Hatfield			40	40	40										120
HS91 (HS13) - Land S of Filbert Close, Hatfield		39													39
HE23 (HS14) - L Kahn Manufacturing, Wellfield Road, Hatfield										31	31				62
HC11 - Meridian House, The Common, Hatfield				11											11
HE17 - Link Drive (Site F), Hatfield			80												80
HC08 - Lemsford Road (Site H) , Hatfield					16	16									32
HSW92 - Minster Close, Hatfield	91														91
HSW94 - College Lane, Hatfield							30	40	45						115
WGr1 (HS15) - Land east of London Road, Woolmer Gr				30	60	60									150
WGr3 - Land west London Road, Woolmer Gr				25											25
WE100 - 51-53 London Road, Woolmer Gr							34								34
OMH8 (HS16/HS17) - 2 Great North Road, O&MH							5								5
OMH5 (HAS16/HS17) - Land rear of 2a-12 Great North Road, O&MH						20									20
OMH9 - Land to the rear of 19-23 The Avenue, O&MH				25											25
GTLAA04 (HS32) - Four Oaks, Gt North Rd, O&MH		6													6
Wel11 (HS18) - The				30											30

Supply/Site	Current Year	1	2	3	4	5	6	7	8	9	10	11	12	13	Total plan period
	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	
Vineyards, Welwyn															
Wel4 (HS19) - Sandyhurst, The Bypass, Welwyn			37												37
Wel3 (HS20) - School Lane, Welwyn				9											9
Wel1 - Land at Kimpton Road, Welwyn							36	60	64	18					178
Wel2 - Land adj Wel Cemetery , Welwyn							20	20							40
Wel15 - Fulling Mill Lane, Welwyn							8	6							14
Wel6 - Land at Kimpton Road, Welwyn								16							16
Dig1 - Land east of New Road, Digswell				15	45	20									80
StL13 - Land at Roebuck Farm, Lemsford				30											30
StL15 - East of Great North Road , Stanborough			8												8
StL1 - North of New Road , Stanborough				20	35	35									90
WeG4b (SDS7) - Marshmoor, Wel Green					50	50									100
GTLAA01 (HS35) - Foxes Lane, Dixons Hill Rd, Wel Green		12													12
WeG1 - 51 Welham Manor , Wel Green			16												16
WeG3a Land South of Wel Manor , Wel Green			24	44											68
WeG10 - Dixons Hill Road, Wel Green							60	60							120
WeG12 - Land N of Pooleys Lane, Wel Green				15	30	38									83 (45)
WeG6 - Skimpans Farm, Wel Green					36	37									73
WeG15 - Land at Potterells Farm, Wel Green				28	28										56
BrP13 (HS21) - Land west of Golf Club Rd, Brookmans Park				14											14
BrP4/4a (HS22) - Land West of Brookmans Park Station,							85	86	86	86	85				428

Supply/Site	Current Year	1	2	3	4	5	6	7	8	9	10	11	12	13	Total plan period
	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	
Brookmans Park															
BrP14 (HS23) - Land east of Golf Club Road, Brookmans Park			10												10
BrP12 - Land North of Peplins Way, Brookmans Park			62	63											125
BrP1 - Upper Bell Lane, Brookmans Park			52	52											104
LHe1 (HS24) - Land N of Hawkshead Rd, Little Heath			17	18											35
LHe4/5 - Part of Studlands/Videne, Little Heath			16	47											63
No02 (HS26) - 36 The Ridgeway and land to the rear, Cuffley	6														6
Cuf1 (HS27) - Land at The Meadway, Cuffley				20	40										60
Cuf6 (HS28) - Land south of Northaw Road East, Cuffley		35	46	40											121
Cuf12 (HS29) - Land North of Northaw Road East, Cuffley				18	55										73
Cuf7 (HS30) - Wells Farm, Northaw Road East, Cuffley			14	61											75
Cuf15 - King George V Playing Fields, Cuffley					40	60	60	16							176
Total Supply - All Sites	613	578	1,001	1,775	1,642	1,243	1,078	1,073	727	593	506	325	300	289	14,474
	613	6,239					3,977					914			14,474

Appendix D – Housing Requirement Calculations

- 1.1 The Council has now updated its monitoring information to 1st April 2022, including completions for the 2021/22 monitoring year. The shortfall and resulting housing requirement for the remaining plan period has been updated based on this new information.
- 1.2 This note sets out the residual housing requirement and the 10 year housing supply that would need to be met from identified sites and broad locations for the remaining plan period based on the Full Objectively Assessed Housing Need (FOAHN) of 760 dwellings per annum for both a start date for the 10 year supply of 1st April 2022 and a start date of 1st April 2023.
- 1.3 The Inspector's report EX274 sets out his conclusion on the FOAHN and the housing requirement for the plan period being 2016-36 of 15,200 dwellings with an average of 760dpa. Completions during the plan period to 31st March 2022 equate to 2,731 dwellings (this is a net figure) resulting in **a residual requirement for 12,469 dwellings** for the plan period **an average of 890.6 dpa**.
- 1.4 The 5th bullet point paragraph 16 of the Inspector's letter EX274 states that the average residual requirement will be the basis for assessing future 5 year housing land supply calculations. It presumed that this would also form the basis for the calculation of the 10 year housing land supply requirement which would also need to incorporate the buffer. Government policy requires that the buffer is brought forward from the latter part of the plan period. This results in the following calculation set out below:
- Average annual requirement of 890.6 dwellings x 10 = 8,906
 - Plus the buffer of 890.6 dwellings = 9,796.6
 - - 494.8 dwellings brought forward from year 6-10 (with the remaining 395.8 to be deducted from years 11-14) = 9,301.8
 - Residual requirement = **9,302**

Table 1 Residual Requirement

Housing Requirement	Completions 16/17 - 21/22	Years 1-5 (2022/23-2026/27)	Years 6-10 (2027/28-2031/32)	Years 11-14 (2032/33-2035/36)	Total residual requirement	Total Years 1-10
Target		4,453	4,453	3,563		
Buffer (20%)		890.6	-494.8	-395.8		
Total Required	2,731	5,343.6	3,958.2	3,167.2	12,469	9,301.8

1.5 However, any identified shortfall needs to be addressed in the first five years where possible in accordance with the Sedgefield methodology. Other approaches can be used where this is not possible.

1st April 2022 Start Date

1.6 In the six years since the start of the plan period (1st April 2016 to 31st March 2022), housing completions have totalled **2,731** dwellings against a requirement of 4,560 dwellings (6x760). The resulting shortfall of 1,829 dwellings will need to be made up in future years.

1.7 This shortfall is higher than previously forecast and therefore the residual housing requirement will be higher than presented previously.

1.8 A 20% buffer has also been applied reflecting under delivery of housing in Welwyn Hatfield in recent years. The buffer is applied to the requirement for the first five years including the shortfall, as specified in the July 2019 Housing Supply and Delivery Planning Guidance¹. The buffer has been moved forward from years 6-14.

1.9 The Sedgefield methodology for calculating housing land supply makes up the shortfall in the first five years. The housing requirement using this methodology is presented in Table 2.

¹ Housing Supply and Delivery Guidance, Paragraph 022, July 2019 - <https://www.gov.uk/guidance/housing-supply-and-delivery#calculating>

Table 2 Housing Requirement - Shortfall made up in years 1-5 (Sedgefield)

Housing Requirement	Completions 16/17 - 21/22	Years 1-5 (2022/23-2026/27)	Years 6-10 (2027/28-2031/32)	Years 11-14 (2032/33-2035/36)	Total Years 1-10	Total Plan period
Completions	2,731					
Target (760 dpa)	4,560	3,800	3,800	3,040		
Shortfall	1,829	1,829	N/A	N/A		
Buffer (20%)	-	1,125.8	-625.4	-500.4		
Total	2,731	6,754.8	3,174.6	2,539.6	9,929.4	15,200

1.10 Using the Sedgefield method, over the first ten years of the plan period (in which a supply of specific developable sites needs to be identified) the requirement is for 9,929 dwellings. The five year housing supply requirement would be 6,755 dwellings. The Council has been reviewing evidence around the deliverability of sites, and the latest evidence indicates that the shortfall could not be made up in the first five years even if all potential sites were allocated.

1.11 However, the shortfall could potentially be made up in years 6-10. This would result in a requirement for the first ten years of 9,767 dwellings and a five year housing supply requirement of 4,560 dwellings.

Table 3: Housing Requirement - Shortfall made up in years 6-10

Housing Requirement	Completions 16/17 - 21/22	Years 1-5 (2022/23-2026/27)	Years 6-10 (2027/28-2031/32)	Years 11-14 (2032/33-2035/36)	Total Years 1-10	Total Plan period
Completions	2,731					
Target (760 dpa)	4,560	3,800	3,800	3,040		
Shortfall	1,829	N/A	1,829	N/A		
Buffer (20%)		760.0	-422.2	-337.8		
Total	2,731	4,560	5,207	2,702	9,766.8	15,200

1.12 A commonly used alternative to the Sedgefield methodology for calculating housing land supply is the Liverpool approach, which makes up the shortfall over the whole plan period. Table 4 below presents the housing requirement using the Liverpool approach. The requirement for the first ten years is 9,302 dwellings and the five year housing supply requirement is 5,344 dwellings.

Table 4: Housing Requirement - Shortfall made up across years 1-14 (Liverpool Method)

Housing Requirement	Completions 16/17 - 21/22	Years 1-5 (2022/23-2026/27)	Years 6-10 (2027/28-2031/32)	Years 11-14 (2032/33-2035/36)	Total Years 1-10	Total Plan period
Completions	2,731					
Target (760 dpa)	4,560	3,800	3,800	3,040		
Shortfall	1,829	653.2	653.2	522.6		
Buffer (20%)		890.6	-494.8	-395.8		
Total	2,731	5,343.9	3,958.4	3,166.7	9,302.3	15,200

1.13 The first two approaches set out in Table 2 and 3 exceed the 10 year dwelling requirement which would apply if the standard methodology for assessing local housing need were to be applied. The standard methodology is currently 888 dwellings per annum and is anticipated to rise to 892 dwellings per annum in 2025, assuming there is no change in approach in the NPPF or accompanying government guidance.

1.14 Both the Liverpool methodology and the standard methodology result in similar 'to find figures' for the ten year period. The ten year requirement figures are lower than the approach set out in Table 2 but higher for the first five years of the plan period. It is interesting to note that the use of the Liverpool methodology results in figures very similar to the standard methodology as set out below in Table 5 below.

Table 5: Standard Methodology - target of 888dpa and 892dpa, no shortfall as incorporated into affordability ratio

Housing Requirement	Years 1-5 (2022/23-2026/27)	Years 6-10 (2027/28-2031/32)	Years 11-14 (2032/33-2035/36)	Total Years 1-10	Total Years 1-14
Target (888 dpa)	4,440	4,440	3,552		
Buffer (20%)	888	-493.3	-394.7		
Total Required (888 dpa)	5,328	3,947	3,157	9,275	12,432
Target (892 dpa)	4,460	4,460	3,568		
Buffer (20%)	892	-495.6	-396.4		
Total Required (892 dpa)	5,352	3,964	3,172	9,316	12,488

1st April 2023 Start Date

1.15 The same exercise has been carried out for a later start date. An estimate of 613 dwelling completions for 2022/23 has been used as the basis for calculating the increase in the shortfall that would need to be carried forward. Completions would therefore increase from 2,731 to 3,344 and the shortfall from **1,829 to 1,976**.

1.16 The shortfall has then been used to calculate both the Sedgefield and Liverpool approaches as well as two other approaches relating to making up the shortfall in years 1-10 and 6-10.

Table 6: Shortfall is made up in years 1-5 (Sedgefield methodology)

Housing Requirement	Estimate Completions 16/17 - 22/23	Years 1-5 (2023/24 - 2027/28)	Years 6-10 (2028/29- 2032/33)	Years 11-13 (2033/34- 2035/36)	Total Years 1-10	Total Years 1-13
Target		3,800	3,800	2,280		
Shortfall		1,976	N/A	N/A		
Buffer (20%)		1155.2	-722.0	-433.2		
Total Required	3,344	6,931.2	3,078.0	1,846.8	10,009.2	11,856.0

Table 7: Shortfall is made up in years 1-10

Housing Requirement	Estimate Completions 16/17 - 22/23	Years 1-5 (2023/24 - 2027/28)	Years 6-10 (2028/29- 2032/33)	Years 11-13 (2033/34- 2035/36)	Total Years 1-10	Total Years 1-13
Target (760 dpa)		3,800	3,800	2,280		
Shortfall		988	988	N/A		
Buffer (20%)		957.6	-598.5	-359.1		
Total Required	3,344	5,745.6	4,189.5	1,920.9	9,935.1	11,856.0

Table 8: Shortfall is made up in years 6-10

Housing Requirement	Estimate Completions 16/17 - 22/23	Years 1-5 (2023/24 - 2027/28)	Years 6-10 (2028/29- 2032/33)	Years 11-13 (2033/34- 2035/36)	Total Years 1-10	Total Years 1-13
Target		3,800	3,800	2,280		
Shortfall		N/A	1,986	N/A		
Buffer (20%)		760.0	-475.0	-285.0		
Total Required	3,344	4,560.0	5,301.0	1,995.0	9,861.0	11,856.0

Table 9: Shortfall made up in years 1-13 (Liverpool methodology)

Housing Requirement	Estimate Completions 16/17 - 22/23	Years 1-5 (2023/24 - 2027/28)	Years 6-10 (2028/29- 2032/33)	Years 11-13 (2033/34- 2035/36)	Total Years 1-10	Total Years 1-13
Target		3,800	3,800	2,280		
Shortfall		760.0	760.0	456.0		
Buffer (20%)		912.0	-570.0	-342.0		
Total Required	3,344	5,472.0	3,990.0	2,394.0	9,462.0	11,856.0

Conclusions

- 1.17 The housing requirement for the ten year period varies from 9,300 to 10,074 depending on the assumptions and the date of adoption. Appendix C demonstrates that there are insufficient sites to meet the targets for the five years associated with the Sedgefield approach in either of the scenarios set out in Tables 2 and 6. It is also questionable whether the market would deliver the numbers involved which, because firstly supply for years 1-2 will essentially come from known commitments and secondly this would result in levels of delivery significantly higher than those previously experienced in the borough even when the market was particularly buoyant.
- 1.18 There are sufficient sites which have been found sound to meet the shortfall target for Years 11-13 associated with the Liverpool approach. Appendix C indicates that there are additional sites which could increase supply in years 1-10 under all approaches.

Appendix E - Census (2021) Note

July 2022

The 2021 Census took place on 21 March 2021 and the first results were released by the Office for National Statistics (ONS) on 28th June 2022; which showed that Welwyn Hatfield's population at the time of the Census was 119,900 persons and the number of households 46,200. This results in a number of persons per household of 2.60.

Comparing the 2021 Census results to the population projections for 2021 shows that all of the variant projections had overestimated the population and number of households in Welwyn Hatfield. The 2018-based alternative projections overestimated Welwyn Hatfield's population in 2021 by 7,164 persons and households by 3,020. This difference in percentage terms was greater than most surrounding areas.

Table 1: Population at the 2021 Census compared with 2018-based population projections for 2021

Population	2021 CENSUS	2018-based principal (2021 estimate)	Difference	2018-based alternative (2021 estimate)	Difference
Welwyn Hatfield	119,900	125,266	-4.3%	127,064	-5.6%
Broxbourne	99,000	97,016	2.0%	97,605	1.4%
East Hertfordshire	150,100	150,745	-0.4%	151,429	-0.9%
Hertsmere	107,800	105,173	2.5%	105,502	2.2%
North Hertfordshire	133,200	134,479	-1.0%	135,365	-1.6%
St Albans	148,200	148,256	0.0%	148,948	-0.5%
Barnet (London)	389,300	403,015	-3.4%	404,284	-3.7%
Enfield (London)	330,000	336,243	-1.9%	340,350	-3.0%
Hertfordshire (county)	1,198,800	1,196,507	0.2%	1,204,219	-0.4%
England	56,489,800	56,989,570	-0.9%	56,989,570	-0.9%

Looking at the difference between the census results and projections by age group for Welwyn Hatfield, the population for the 20-34 age groups were significantly over estimated; by 5,315 persons across these three age groups.

The working age population (15-69 age group) was also lower than was projected; at 85,000 persons compared to the projected 90,073 for 2021 in the 2018-based alternative projections.

However, it is important to note that the coronavirus pandemic may have had some impact on where students lived at the time of the Census. The Quality and Methodology information for the 2021 Census from the ONS states that: "For some students and in some urban areas, there is evidence that the coronavirus pandemic did result in changes to where people lived."

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Appendix F
Main Modifications (Topics)

Movement

MM 1

Page No.	Policy/Para No.	Proposed Main Mod	Reason
48	Paragraph 7.1	<p>the borough's highways transport network functions well, and alternative sustainable forms of transport are promoted and secured. <u>It supports the objectives of the Hertfordshire Growth and Transport Plan which are:</u></p> <ul style="list-style-type: none"> • <u>Connected – improved transport connections between and within towns and rural areas; improved services to support economic activity, education, access to services; and the development of new jobs and homes.</u> • <u>Accessible – provide improved transport networks by all travel modes, including public transport services, to increase the choice available and reduce barriers to prosperity, development and growth.</u> • <u>Efficient – make the most effective use of resources and technology by reducing peoples' need to travel and enabling a shift to more sustainable modes of travel.</u> • <u>Place – enhance the function and character of South Central Hertfordshire's neighbourhoods and public locations to support vibrant communities, and preserve and enhance the local environment and quality of life.</u> • <u>Reliable – improved network resilience and journey time reliability for all users, so that transport networks and services provide consistent and dependable journeys throughout the day.</u> • <u>Healthy & Safe – promote measures to improve safety and reduce the negative impacts of motorised travel, in particular private car travel; to reduce the harm caused to public health, the environment and to minimise safety risks.</u> 	<p>To support the objectives of the Hertfordshire Growth and Transport Plan.</p>

Movement

Table 1 MM/

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	48	Paragraph 7.1	<p>the borough's highways transport network functions well, and alternative sustainable forms of transport are promoted and secured. <u>It supports the objectives of the Hertfordshire Growth and Transport Plan which are:</u></p> <ul style="list-style-type: none"> • <u>Connected – improved transport connections between and within towns and rural areas; improved services to support economic activity, education, access to services; and the development of new jobs and homes.</u> • <u>Accessible – provide improved transport networks by all travel modes, including public transport services, to increase the choice available and reduce barriers to prosperity, development and growth.</u> • <u>Efficient – make the most effective use of resources and technology by reducing peoples' need to travel and enabling a shift to more sustainable modes of travel.</u> • <u>Place – enhance the function and character of South Central Hertfordshire's neighbourhoods and public locations to support vibrant communities, and preserve and enhance the local environment and quality of life.</u> • <u>Reliable – improved network resilience and journey time reliability for all users, so that transport networks and services provide consistent and dependable journeys throughout the day.</u> • <u>Healthy & Safe – promote measures to improve safety and reduce the negative impacts of motorised travel, in particular private car travel; to reduce the harm caused to public health, the environment and to minimise safety risks.</u> 	To support the objectives of the H Transport Plan.

Movement

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	48	SP 4	...sustainable modes of travel and on improving safety for all highways users . The Council will work together with the County Council as the local highway authority, Highways England, public transport operators, developers and other relevant bodies to design and fund improvements to transport infrastructure where these are necessary to support growth or to improve accessibility to existing centres, employment areas and community facilities <u>and meet sustainable transport objectives.</u>	For clarification.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	48	Paragraph 7.2	...Local Transport Plan (LTP) <u>and Growth and Transport Plan (GTP).</u>	For clarification.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	50	Paragraph 7.12	...within the application and on plan, as appropriate. <u>The emerging Growth and Transport Plans being prepared by Hertfordshire County Council contain an integrated and sustainable transport strategy including a range of transport infrastructure projects. These will be incorporated into the Infrastructure Delivery Plan (see policy SP13). Developer contributions towards the GTP projects will be sought in</u>	For clarification.

7 Movement

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<u>accordance with the transport and infrastructure policies of this plan, in order to support sustainable development and help to manage the transport impacts of developments.</u>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	51	SADM2; sub paragraph i	There would be no unacceptable impacts on the local and/or strategic transport network. <u>There would be no severe residual cumulative impacts on the local and/or strategic transport network once any cost-effective and achievable mitigation measures have been taken into account.</u>	For consistency with national policy as set out in paragraph <u>111</u> of the NPPF (<u>2021</u>).

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	51	SADM2; sub paragraph iii	They are designed to allow safe and suitable means of access and site operation <u>to and from the site for all users; and</u>	For consistency with national policy as set out in paragraph <u>110</u> of the NPPF (<u>2021</u>).

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	51	SADM2; sub paragraph iv	They provide satisfactory and suitable levels of parking, <u>in accordance with the criteria set out in SADM12 and the Council's parking</u>	For clarity and consistency with national policy as set out in paragraph <u>107</u> of the NPPF (<u>2021</u>).

Movement

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<u>standards, and taking into account the opportunities for public transport, cycling and walking.</u>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	52	SADM3; sub paragraph ii	ii. Cyclists, through safe design and layout of routes integrated into new development and the wider cycle network and , provision of secure cycle parking and where appropriate changing facilities <u>together with enhancements to and links with the wider cycle network.</u>	For clarification.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	52	SADM3; sub paragraph iii	iii. Pedestrians (including disabled persons and those with impaired mobility), through safe, accessible, direct and convenient design and layout of routes within the new development <u>which link to an improved</u> and wider pedestrian network	For clarification.

Movement

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/7/TBC	52	Paragraph 7.15	Sustainable modes of transport should be facilitated through new developments to promote accessibility and integration into the wider community and existing networks. Policy SADM 3 encourages development to support people and businesses in using sustainable means of transport. <u>Enhancements to transport infrastructure both on and off the development sites should link to create a more comprehensive and linked overall network in line with sustainable travel objectives.</u>	For clarification.

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	53	Paragraph 8.1	<p>and retail forecasts...</p> <p><u>This Local Plan, and the evidence base supporting it, was prepared before the Covid-19 pandemic and the resulting economic impact, including the impact on a number of national retailers and on town centres. Currently, it is unclear what the long term impact on retail and town centres will be. However, the Council believes that town and neighbourhood centres will play an important role in their communities and will continue to provide a range of services and functions. As a result, the Council will keep retail evidence under review and may bring forward revised policies once the post-Covid situation becomes clearer.</u></p> <hr/>	To acknowledge the significant, yet unknown, impacts on Covid-19 and changes to the Use Classes Order 2020.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	53	Paragraph 8.2	<p>“...Oldings Corner, Hatfield (which currently offers a Tesco, Homebase, <u>B & M Stores</u>, Next, Pets at Home)...”</p> <hr/>	To update following change of occupier.

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	53	Policy SP5: Retail Hierarchy	“...to meet forecast expenditure growth to 2026 at <u>least 2027</u> in the defined retail centre...”	Date changed to 2027 to be five years from the adoption of the plan. In previous forecasting work, the growth in any one year was small and it was considered that existing outlets could absorb a degree of additional growth within existing floorspace. Combined with the current uncertainty, it is not considered necessary to update floorspace requirements.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	54	Policy SP5: Retail Hierarchy	Individual Small Convenience Stores: “A number of small convenience shops (below 280sq.m gross floorspace) provide for...”	To reflect that small convenience stores come in a variety of sizes, and an actual floorspace based definition is unnecessary.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	55	SP 5 ; new paragraph to end of policy	<u>To further protect the role, function and vitality of town, neighbourhood and village centres, and to ensure that they contain the most appropriate uses, the Council will consider the use of conditions or planning obligations to restrict changes to non- town centre uses</u>	To ensure inappropriate uses do not come forward by virtue of being in the same use class.

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	56	Paragraph 8.4	Change required for paragraph 8.4 regarding the quantum of need.	To reflect evidence.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	56	Paragraph 8.4	...be met by food and drink floorspace (<u>the former</u> Classes A3 - A5) _____	To acknowledge changes to the Use Classes Order 2020. The new use classes have not been specifically used in this paragraph as two are now sui generis and one falls within Class E.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	56	Paragraph 8.7	“There is considerable uncertainty in retail forecasting beyond ten years , partly for...” “...trends in retailing will play out in the future <u>particularly given the impact on retail and town centres from the Covid-19 pandemic</u> . It is for this reason that the council’s strategy for quantity of retail development is focussed on 2026 <u>at least 2027</u> . The Council will keep its retail evidence base under review”. _____	To acknowledge changes to the Use Classes Order 2020. The new use classes have not been specifically used in this paragraph as two are now sui generis and one falls within Class E.

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	57	SADM 4; Town Centre Anchor Stores	...Anchor Store from an A1 Retail <u>E Class</u> use, unless it...	To acknowledge changes to the Use Classes Order 2020.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	57	SADM 4; Town Centre Frontages	<p>Planning permission will be granted for Class <u>E A</u>-uses. To maintain the vitality and viability of Welwyn Garden City and Hatfield town centres, within the defined Primary Frontage, the Council will support proposals for changes of use, provided that:</p> <p>i. At least 70% of the defined Primary Frontage (by length) within which the unit is located will remain in <u>those categories of class E A1 retail uses considered appropriate in town centres</u>;</p> <p>ii. There will be no more than two adjoining units in uses other than <u>those categories of E class uses A1 considered appropriate in town centres</u> retail; and</p> <p>Planning permission will be granted for <u>those categories of Class A1 E uses considered appropriate in town centres</u> within the Secondary Frontage</p>	

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<p>i. At least 30% of the Secondary Frontage (by length) within which the unit is located will remain in those categories of E class A1 retail uses considered appropriate in town centres;</p> <p>ii. There will be no more than five adjoining units in uses other than A1 retail <u>those categories of E class uses considered appropriate in town centres</u>; and</p>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	57	SADM 4; Town Centre Frontages	<p>At least 70% of the defined Primary Frontage (by length) within which the unit is located will remain in those categories of class E A1 retail uses considered appropriate in town centres <u>[footnote to be added: As set out in the definition of "Main Town Centre Uses" in the National Planning Policy Framework]</u></p>	Change originally proposed in 2021 Main Modifications (EX23). This subsequent modification responds to the Inspector's comments on EX235.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	58	SADM 4; Neighbourhood and Village Centres	Within the defined Retail Frontage(s) of Large Neighbourhood or Large Village centres	

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<p>i. At least 50% of the Retail Frontage(s) (by number of units) remain in those categories of A1 retail <u>E class uses considered appropriate in town centres</u>;</p> <p>ii. There will be no more than two adjoining non <u>E class use</u> A1 retail units within any part of the frontage;</p>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	58	SADM 4 ; Small Neighbourhood or Small Village centres	<p>i. The loss would not have a detrimental impact on the provision of <u>services and facilities</u> A1 retail within the wider neighbourhood or village whose centre the <u>premises</u> shop is within;</p> <p>ii. The centre would remain in a predominantly <u>in those categories of E class</u> A1 retail uses <u>considered appropriate in town centres</u>;</p>	To acknowledge changes to the Use Classes Order 2020.

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Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	58	SADM 4 ; Small Neighbourhood or Small Village centres	Bullet point (i) within the wider neighbourhood or village whose centre the <u>premises</u> shop is within	Change originally proposed in 2021 Main Modifications (EX23). This subsequent modification responds to a typo highlighted by the Inspector in his comments on EX235.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	58	SADM 4; Requirement for Marketing	Neighbourhood or Village Centre. <u>For developments consisting of uses other than Main Town Centre Uses, as defined in the National Planning Policy Framework,</u> it will alsothat there is a lack of demand for an <u>E class A1 retail uses</u> in that location. Guidance on measuring retail frontages ...	To acknowledge changes to the Use Classes Order 2020.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	58	Paragraph 8.13	Both town centres contain large stores which anchor the rest of the retail offer, benefiting other shops in the centre. Because of the important role they play, Anchor Stores have been defined in this policy and the loss of their retail use is resisted. In considering a proposal where part of an Anchor Store will be lost to a	To acknowledge changes to the Use Classes Order 2020.

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			non-retail town centre use the assessment of significance will relate to the impact that the loss of any A1 Class E(a) floorspace would have on the vitality and viability of the town centre.	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	58	Paragraph 8.14	he definition of primary frontages enables the Council to maintain town centre uses retail as a dominant use ...	To acknowledge changes to the Use Classes Order 2020.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	59	Paragraph 8.15	By defining retail frontages for the borough's neighbourhood and village centres, this policy protects the retail function of these centres ...it is important that village and neighbourhood centres retain a good range of town centre uses shops .	To acknowledge changes to the Use Classes Order 2020.

Centre, Services and Facilities

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	59	Policy SADM5	Bullet point (i): "...there is a lack of demand for an A1 a shop in that location..."	To reflect changes to the Use Classes Order.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/8/TBC	60	Paragraph 8.22	"...generated by expenditure growth to 2026 2027 within the hierarchy..."	To ensure five years from adoption of the plan (see above).

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	66	SP7; Second paragraph	Proposals for 44 <u>10</u> or more new dwellings should demonstrate ...	To ensure compliance with the NPPF 2019.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	66	SP7; Second paragraph	...or more new dwellings should demonstrate how the mix of tenure, type and size of housing proposed on sites <u>has had regard</u> to will reflect the council's latest evidence of housing need...	For clarification. Tables in the plan are not prescriptive. In response to request from a representor.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	66	SP7; in the last row of the affordable housing table	...in sustainable <u>accessible</u> locations compatible with Green Belt policy.	For clarification. Affordable housing should be located in locations with good accessibility to services and facilities. Consistent with the approach in other parts of SP7.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	67	SP7; Housing for older people	As part... through the provision of a range of housing <u>types and</u> options such as...	To clarify that a range of housing types (e.g. bungalows/flats) can contribute towards meeting the housing needs of older people as well as supported housing options.

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	67	SP7; Self- build and custom housebuilding	<p>Strategic Development Sites SDS1 (WGC4), SDS2 (WGC5), SDS5 (Hat1) and SDS6 (Hat15) should make provision for a proportion of <u>On sites of 100 or more new dwellings, 2% of serviced dwelling</u> plots <u>should be provided</u> of land to contribute towards meeting the evidence demand for Self-build and Custom Housebuilding in the borough.</p>	To specify the requirement for self-build and housebuilding plots on sites of 100 dwellings or more to assist the Council's in meeting its duties.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	67	SP7; Accessible and adaptable dwellings	<p><u>Accessible and adaptable and wheelchair user dwellings:</u> At least 23<u>30</u>% of all new dwellings on sites involving 5 or more new dwellings will be required to meet Building Regulations Part M4(2) standards for accessible and adaptable dwellings (or as subsequently amended). the delivery of which should be distributed across market and affordable tenures (35). This proportion may be varied where a proportion of dwellings are proposed to meet. <u>In addition, 1.5% of all new dwellings on sites involving 50 or more new dwellings will be required to meet</u> Part M4(3) standards for 'wheelchair user dwellings' (or as subsequently amended)</p>	To increase the M4(2) policy requirement to 30% so that growth over the plan period would make an increased contribution to meeting the needs of households who would most benefit from higher design standards being incorporated from the start. This would cut across all age groups and would deliver around 2,400 new homes to M4(2) standard.

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	68	SP7; twelfth paragraph of policy (subsection on purpose built student accommodation)	...approved by the Council. Off site <u>Off-campus</u> purpose built student accommodation...	To be consistent with terminology used in the first line of this sub-section.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	72	Paragraph 9.21	<p>Self-build and custom housebuilding: The Council has a Self-Build and Custom Housebuilding Register which commenced on 1 April 2016 and as such it is too soon to draw conclusions on the evidenced demand for serviced plots in Welwyn Hatfield over the plan period. However, it is already apparent from the limited number of applicants who have registered their interest Register that the demand for plots is often directed at multiple search locations and not solely for plots of land within Welwyn Hatfield. <u>and the demand for serviced plots will be monitored to inform the implementation of this policy at strategic Development Sites and on other allocated or windfall sites. Measures will be put in place, either through the use of planning conditions or planning obligations to secure a proportion of serviced self-build or custom housebuilding plots on relevant sites. The requirement to provide plots will be reviewed and waived only where it can be robustly demonstrated that plots have been made available and actively.</u></p>	To provide a proportionate response to the latest evidence of demand and provide clarification of the approach to be taken if the demand for self-build does not materialise on a site by site basis.

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<u>continuously and extensively marketed at a realistic market value for at least 12 months. Where there is robust evidence of no realistic demand for plots, then with the agreement of the local planning authority, these may then be offered to the Council or a Registered Housing Provider for affordable housing, or be built out by the developer to the open market.</u>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	73	Paragraph 9.24	<p>The policy includes ... in accordance with Building Regulations requirements for M4(2) and M4(3) standards. The on-site delivery target may be varied where dwellings that meet standards for M4(3) Category 3 'wheelchair user housing' (or as subsequently amended) are provided, subject to National Planning Practice Guidance which indicates that a policy requirement should only be applied to M4(3) Category 3 'wheelchair user housing'. <u>The policy requirement is a 'minimum' requirement for sites involving a qualifying number of new dwellings and wherever practical and viable, all homes specially designed for older people should be built to at least M4(2) standards. Delivery to M4(3)(2)(a) standard will be required across all tenures and delivery to M4(3)(2)(b) standard will only be required where the local authority is responsible for</u></p>	To correct a factually incorrect sentence and modify the sentence in line with the proposed modification to Policy SP7. To highlight that a planning condition must be imposed in order to apply the M4(2) and M4(3) standards via the Building Regulations. To ensure that housing for older people is suitably designed to take account of the ongoing needs of future occupants.

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			allocating or nominating a person to live in that dwelling. <u>For both M4(2) and M4(3), provision will be rounded up to the nearest whole number. For the M4(2) and M4(3) standards to be applied, a condition on a planning consent must require it.</u>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	73	Paragraph 9.25	<p>The Council recognises that the latest needs assessment...a number of sites. Table 6 below indicates that the delivery of 61 pitches is anticipated across 7 sites, to potentially include an element of transit provision. The size of any new site should generally not exceed 15 pitches, and in most cases be smaller. Allocations associated with Strategic Development Sites are proportionate to the overall number of dwellings estimated to be delivered at these locations and provision is either made within Strategic Development Sites or on suitable alternative sites nearby</p>	<p>To clarify that a mix of residential or transit pitch provision will be supported in principle in light of the prevailing evidence at the time an application is made (see minor change to para 9.13 in the Minor Changes Schedule). To reflect that the Coopers Green Lane site is deleted from Table 6, Policy SADM35 and SP22 and provision is made within site SDS5, SDS6 and at HS33. See modification to Table 6 below.</p>

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	74	Paragraph 9.27	<p>Purpose built student accommodation to meet the demonstrated needs of higher education providers in the borough will be supported where:</p> <p>(i) <u>On campus provision</u> this is in accordance with a master plan that has been approved by the Council.</p> <p>(ii) Off site <u>campus provision</u> purpose built student accommodation will be supported where it is highly accessible to a main university or college campus within the borough by walking, cycling and public transport and provides sufficient on-site car parking, <u>where required</u>;</p>	<p>Turned into bullet points for ease of reading and clarity.</p> <p>To address concerns raised by the University of Hertfordshire during hearing sessions.</p>

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	74	Paragraph 9.27	<p>New final sentence:</p> <p><u>Applications should be accompanied by details setting out proposals for the organisation and management of the accommodation to demonstrate that the proposal will meet the specific need for student accommodation. Where necessary, the Council will use conditions to ensure that such accommodation remains specifically for students.</u></p>	<p>To ensure that student accommodation remains for student use</p>

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	74	Paragraph 9.27	<p>Student accommodation: Masterplans may be brought forward for the delivery on on-campus purpose built student accommodation but the Council recognises that not all students will be accommodated on campus. Whilst a number of students may reside with family if local enough to commute, many will move into the borough for the period of their studies. The demand for off-site campus accommodation is mainly satisfied through the private rented market, for example in shared houses or in purpose built student accommodation. The provision of such accommodation will primarily be driven by market demand but <u>In Hatfield planning permission is required to convert a single family dwelling into shared accommodation. Off campus purpose built provision will need to demonstrate it is meeting a specific need for such accommodation. Supporting information could include a nomination agreement with one or more educational institution in the borough. Off campus provision will also need to be in accessible locations.</u> However, care will need to be taken to ensure that existing residents and communities are not adversely affected by the scale or concentration of such uses in any one area. In accordance with national planning guidance, the provision of student accommodation may be counted towards the number of completed dwellings based on the amount of</p>	<p>To address concerns raised by the University of Hertfordshire during hearing sessions, and to reflect that national guidance now exists on the ratio to use to calculate dwelling equivalents from student accommodation.</p>

Housing

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			accommodation it releases in the housing market. For monitoring purposes, this is calculated using a cautious 5:1 ratio between student bedrooms and dwelling equivalents based on an average of 4.5 bedrooms per house in multiple occupation, which has received planning permission in the borough in recent years.	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/9/TBC	73	SP7; Table 6 - Gypsy and Traveller Sites and pitch provision	See revised table 6 below.	To reflect the modification debated and agreed with a representor at the Stage 4 Hearing session.

Housing

Revised Table 6 - Gypsy and Traveller Sites and pitch provision

Site	Site Ref	Number of pitches provided			Total
		By 2022	2017-2027	2027-2032	
Foxes Lane, Welham Green (extension to existing site)	HS35 (GTLAA01)	12	-	-	12
Marshmoor Lane, Welham Green	GTLAA03	1	-	-	1
Four Oaks, Oaklands and Mardley Heath (additional pitches on existing site)	HS32 (GTLAA04)	6	-	-	6
North West Hatfield	SDS5 (Hat1)	0	8	7	14 5
Barbaraville, Mill Green (extension to existing site, <u>in-part to meet need from this site and in-part an off-site contribution for SDS6/Hat15</u>)	HS33 (GTLAA08)	0	4	0	4
Coopers Green Lane (off-site contribution for site SDS6 (Hat15))	HS34 (GTLAA09)	0	6	4	10
North East Welwyn Garden City	SDS1 (WGC4)	-	3	3	6
South East Welwyn Garden City	SDS2 (WGC5)	-	6	5	11

Housing

<u>Symondshyde New Village (partly met at site HS33)</u>	<u>SDS6 (Hat15)</u>	<u>0</u>	<u>2</u>	<u>4</u>	<u>6</u>
		19	23	19	61

Economy

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	76	Policy SP8	<p>First bullet point: Resisting the loss of land from <u>industrial, storage, office and research uses (currently Use Classes B and E(g))</u> Class B-uses;</p> <p>Final bullet point: Recognising the important role played by non-Class B land uses <u>other employment generating uses</u> (including retail) in providing employment and contributing to the local economy.</p> <p>Final sentence: The Council will also support the provision of other uses that are ancillary to, but supportive of, Class B <u>or Class E(g)</u> uses in designated employment areas.</p>	To reflect changes in Use Classes Order 2020

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	77	Paragraph 10.2	<p>In 2013-2016, it provided 83,000 <u>87,000</u> jobs. Government figures for 2013 <u>2016</u> show that the job density (the ratio of jobs to the working population aged 16-64) has increased significantly as the economy recovers to 1.10 <u>is 1.09</u> meaning that there are significantly more jobs than workers living in the borough.</p>	Update of data and to remove reference to economic recovery as 2008 recession is not mentioned previously.

Economy

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	77	Paragraph 10.3	<p>...(known as Class B uses and Class E(g) uses). The Council's evidence shows that, to meet predicted growth in employment, loss of land from Class B and Class E(g) uses should be minimised as far as possible. Since 2013, substantial amounts of Class B and Class E(g) employment floorspace have been lost through the permitted development right enabling offices to be converted to residential without planning permission. and it is likely there will be continued losses throughout the plan period. <u>Whilst this may continue to some degree, the Council has introduced an Article 4 Direction which removes this permitted development right on some key employment areas, which should help restrict further losses through the plan period and may introduce further directions if necessary.</u></p>	To reflect changes in Use Classes Order 2020 and to reflect the adopted Article 4 Direction plus potential for further.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	77	Paragraph 10.4	<p>...provides employment on the edge of Welwyn Garden City, close to Birchall Garden Suburb <u>areas with significant residential allocations</u> and incorporates an existing waste site.</p> <p>In accordance with the Broadwater Road West Supplementary Planning Document, taking into account the extension of the BioPark building, 17,650 sqm of new 8250sqm of new</p>	<p>To clarify the proximity of Panshanger as well as Birchall Garden Suburb.</p> <p>To reflect closure of Biopark and its allocation for housing in the Local Plan along with changes to the Use Classes Order 2020.</p>

Economy

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			Class E(g) B4 floorspace (the remainder of the 19,000 sqm requirement in the SPD following the extension of the BioPark building) will also be provided at Broadwater Road West (SDS3/Pea02b and SDS4/Pea02c).	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	78	Paragraph 10.6	<p>The Council's Economic Development Strategy 2015/16-2017-20 notes that...</p> <p>This challenge is also addressed but <u>by</u> the Economic Development Strategy which contains an action for the Council to work with schools, colleges, universities and employment / training agencies to develop skills. <u>business to understand their needs and to influence delivery of provision which meet these.</u></p>	<p>Update of revised Economic Development Strategy</p> <p>To reflect slightly different focus in revised Economic Development Strategy</p>

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	78	Paragraph 10.7	<p>For the reasons set out in paragraphs 5.3 and 5.4, the Council is planning for the <u>total</u> number of total <u>B class and E(g) class</u> jobs in the borough to increase by about 16,900 from 2013 to 2026. <u>2,600 from 2016 to 2036.</u></p>	<p>To reflect revised employment forecasts including a different method of assessing need, and the most recent calculation of supply.</p>

Economy

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<p>Notwithstanding the gains in floorspace that will accrue from the mixed use designation (including Class-B1 <u>E(g)</u> employment) at Marshmoor and Broadwater Road West, losses of <u>office Class-B1(a)</u> floorspace that have taken place since 2013 <u>2016</u> and the losses likely to occur in future mean that the supply of Class B <u>and Class E(g)</u> floorspace the Council is planning for is about 22,000 square metres short of the 138,000 square metres <u>8,300 square metres short of the 60,210 square metres</u> recommended in the most recent analysis Economy Study Update, 2015, though this is subject to some uncertainty. It is clear that the Council cannot meet its full requirement for employment floorspace without having to designate further sites in the Green Belt. National policies have also restricted the ability of the Council to retain existing employment land. For this reason, it is important that existing reserves of employment land are, as far as possible, retained in Class B <u>and Class E(g)</u> uses and measures are implemented to ensure that this happens.</p>	

Economy

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	78	Paragraph 10.12	The Council will consider putting <u>has put</u> in place <u>an</u> Article 4 Directions to prevent the redevelopment change of use of important office blocks for residential, once that provision of the Housing and Planning Act 2016 has been put in place. <u>on several key sites and will consider further such directions if necessary. To further protect employment areas and to ensure that they contain the most appropriate uses, on new planning permissions the Council may use conditions or planning obligations to restrict changes to different uses falling within the same Use Class or to restrict the use of Permitted Development.</u>	To reflect that an Article 4 Direction has been put in place and to explain the use of conditions on new permissions.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	79	SADM 10	All references to use class B1 in tables to be replaced with <u>E(g)</u>	To reflect changes to the Use Classes Order 2020
MM/10/TBC	79	SADM 10 EA2	Site Area: <u>12.0ha</u>	To reflect removal of Chequersfield site.
MM/10/TBC	79	SADM 10 EA10	Site Area: 4.1 <u>1.3ha</u>	Reduction in employment area to remove the Entech House site to the west of London Road which is being developed for housing. This also takes account of employment land to be included in site HS15 (WGr1) .

Economy

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	79	Bullet point ii	<p>Additional text in bullet point (ii):...would clearly be ancillary to the main business use <u>and the extent controlled by condition or planning obligation accordingly.</u></p> <p>After bullet point (ii):<u>Where necessary, conditions will be used to restrict changes between different uses falling within the same Use Class</u> <u>New industrial, storage, office and research buildings (currently Use Classes B and E(g)) will be subject to conditions or planning obligations to restrict changes to different uses falling within the same use class and/or allowed under permitted development. On existing sites, the Council will consider the use of Article 4 Directions to remove Permitted Development Rights where necessary.</u></p>	To reflect changes to the Use Classes Order 2020, including the need to ensure that new permissions are for appropriate uses within Use Classes, to give further policy justification for Article 4 directions where necessary, and to add a missing word.
MM/10/TBC	79	Bullet point v	...the provide facilities which are supportive <u>of</u> Class B <u>or Class E(g)</u> uses	To reflect changes to the Use Classes Order 2020, including the need to ensure that new permissions are for appropriate uses within Use Classes, to give further policy justification for Article 4 directions where necessary, and to add a missing word.

Economy

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/10/TBC	78	Paragraph 10.14	...sufficient employment floorspace to meet forecast job requirements to 2032 2036 .	To reflect revised plan period.

Quality of New Development

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	82	SP9; new section at the end of the Policy	<p><u>Masterplanning</u></p> <ul style="list-style-type: none"> ● <u>A comprehensive approach will be required to be taken to the development of large sites. Masterplans will provide a spatial framework and, as a minimum, will set out the vision and objectives for the development; establish the quantum and distribution of land uses; identify sustainable transport linkages and a movement hierarchy; and the core design concepts for the site which will be based on the principles set out in this Policy above. The masterplan should be informed by an appropriate evidence base together with consultation and be agreed by the Council prior to the determination of any relevant planning application.</u> ● <u>Masterplans will be required in the following circumstances.</u> <ul style="list-style-type: none"> ● <u>Proposals for 500 or more dwellings;</u> ● <u>Large scale ⁽¹⁾ mixed use proposals;</u> ● <u>Proposals related to major developed sites in the Green Belt</u> 	To address concerns at the Examination that policy should address the need for masterplanning.

11 Quality of New Development

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<ul style="list-style-type: none"> <u>Sensitive or complex sites where a number of issues and constraints need to be addressed.</u> 	

1. Mixed use proposals comprising of at least 500 dwellings and/or at least 10,000m² of employment floorspace

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	82	SP9; second bullet point in the Safe and secure subsection	<ul style="list-style-type: none"> Building entrances and public spaces are appropriately sited, designed and lit in order to maximise natural surveillance and a sense of safety. <u>Proportionate steps may need to be taken to reduce vulnerability and increase resilience in locations where large numbers of people may be expected to congregate</u> ⁽¹⁾ 	In order to comply with paragraph 95 and footnote of the NPPF (2018).

1. Locations such as transport hubs, shopping centres, places of worship, visitor attractions and commercial centres and where advice obtained from the relevant agencies indicates that appropriate steps need to be taken.

Quality of New Development

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	82	SP9; insert after Safe and Secure section	<p><u>Healthy and Active</u></p> <ul style="list-style-type: none"> • <u>Open space should be multi functional, attractantly taller and accessible public spaces, which facilitate sport and physical activity.</u> • <u>The internal and external layout, use and design of buildings should promote opportunities for physical activity.</u> 	To ensure new development promotes healthy and active lifestyles.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	82	SP9; Taller buildings subsection; third and fourth bullet point	<ul style="list-style-type: none"> • Impact on skyline, townscape, <u>the historic environment</u> and landscape. • Shadowing <u>and overlooking.</u> 	In response to request from a representor to take into account the historic environment.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	83	New subsection after paragraph 11.4	<p><u>Taller Buildings</u></p> <p><u>A taller building is defined as one that is significantly taller than its surroundings resulting in a prominent feature on the skyline. Welwyn Hatfield is not generally characterised by taller buildings but there are emerging pressures for this type of development and the National Planning Policy Framework 2021 encourages higher density development in accessible locations.</u></p>	To provide greater clarity about how proposals for taller buildings in Welwyn Hatfield should be considered.

11 Quality of New Development

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<p><u>Applicants will be expected to demonstrate a good understanding of an area's character and context in order to identify if a proposal is considered tall and if it is likely to be appropriate. Tall buildings can have a visual and environmental impact and it is important that these issues are addressed. The views from these buildings, at different distances, need to be considered. The zones of visual influence of a proposal should be defined and used to understand the character of the areas that may be affected.</u></p> <p><u>Buildings should have a positive relationship with their location. Drawings and models should be used to demonstrate how proposals will deliver a high quality scheme and pre-application consultation is encouraged.</u></p>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	85	Paragraph 11.9; footnote 52	<p>http://www.hertslink.org/bfintranet-Building Futures Toolkit</p>	To update the outdated reference.

Quality of New Development

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	85	SADM11; point b	Dwellings are dual aspect, <u>wherever feasible, in order</u> to enable passive ventilation and avoid the need for mechanical ventilation, subject to any noise and air pollution mitigation.	To reflect that dual aspect is not always feasible.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	88	SADM12; criterion ii	The siting, layout and design of vehicle and cycle parking, including detached garage blocks, within development proposals will be required to ensure <u>that</u> an attractive and coherent street scene is maintained, not prejudice the wider functionality of public and private space, and create an effective functional link and relationship to the buildings and areas they will serve <u>that the main purpose of any adjacent open space is protected, and that parking spaces are appropriately related to the part of the development that they serve.</u>	For clarification.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/11/TBC	88	SADM12; criterion iii	<u>An appropriate level and type of vehicle charging infrastructure</u> Electric vehicle charging points will be incorporated into <u>town centre</u> parking areas <u>and at</u> for new <u>or regenerated</u> neighbourhood centres <u>where the opportunity arises.</u> and the necessary	In order to better future proof development in preparedness for this growing technology.

Quality of New Development

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			infrastructure provided for major residential, schemes <u>Appropriate provision should also be made within new employment and leisure related development.</u>	

Environmental Assets

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	103	SP12	Strategic Green Infrastructure	For clarity as the policy relates to all Green Infrastructure.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	103	Figure 8	Revised figure 8 to follow once final green corridor route has been revised following decisions on the strategic sites.	To ensure consistency and to reflect conclusion of Inspector following hearing sessions.

Environmental Assets

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	104	SP12; third paragraph	New development should have regard to <u>meet the</u> standards for <u>the</u> provision of open space...	To strengthen policy wording as discussed at the stage 3 hearing sessions (Q91 of WHBC hearing statement) and to better reflect the garden city principles.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	108	SADM15; sixth bullet point	<ul style="list-style-type: none"> <u>Recording appropriately</u> the fabric or features that are to be lost or compromised takes place <u>and making provision for archive deposition of the analysis and records of the site investigation.</u> and the information is made publicly available. It should be <u>is deposited into the Historic Environment Record and any archive to an appropriate depository.</u> 	To reflect comments from the Historic Environment Unit at Herts County Council and reflect NPPF 2012 (141).

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	108	SADM15; second paragraph	A Heritage Statement, Heritage Impact Assessment and/or Archaeological Assessment will be required if the scale and/or nature of the proposal are likely to have an impact on the significance of all or part of the asset. <u>An assessment may be required in locations which are not designated but where the potential to</u>	To acknowledge sites that may have potential to contain unidentified heritage assets.

Environmental Assets

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<u>contain heritage assets exists or further understanding of the significance of known heritage assets is needed.</u>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	108	SADM15; third paragraph	Permission for proposals that result in substantial harm to the significance of a designated heritage asset including <u>a</u> Conservation Area, <u>and to its setting</u> , will be exceptional or wholly exceptional in accordance with national policy and guidance.	In response to request from Historic England, to provide clarification.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	108	SADM15; fourth paragraph	Proposals that result in less than substantial harm to the significance of a designated heritage asset <u>will be weighed against the possible</u> will also be refused unless the need for, and the public benefits of the development in that location <u>and whether or not these</u> significantly outweigh that harm and the desirability of preserving the asset...	To provide clarity in response to request from Historic England.

Environmental Assets

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	113	SADM17; new criterion iv	<u>.or iv. Be education development associated with the delivery of school facilities required to meet the evidenced need for additional school places where it can be demonstrated that the impact on the Urban Open Land has been reduced to the minimum possible and where the provisions of criterion iii of the policy have been met.</u>	To provide clarity on the implementation of the policy in respect of education uses.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/12/TBC	115	SADM18; noise and vibration point iii	iii. Intrusive and would have an adverse effect on human health <u>the quality of life</u> or the natural environment will be resisted unless the need for, and benefits of, the development outweigh the harm and all feasible solutions to avoid <u>reduce to a minimum</u> and mitigate that harm have been fully implemented, <u>including the use of planning conditions.</u>	To provide clarity.

Infrastructure

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/13/TBC	120	SP13; fourth paragraph	The Council will use <u>grant funding</u> the adopted Planning Obligations SPD , Section 106 agreements, unilateral undertakings, planning conditions, and when adopted, the Council's CIL Charging Schedule, to secure this. <u>The adopted Planning Obligations SPD sets out guidance in relation to the negotiation of Section 106 contributions and will be updated in due course to reflect the Council's approach to planning obligations once the Community Infrastructure Levy has been implemented.</u>	To clarify the Council's approach to infrastructure delivery.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/13/TBC	122/3	Paragraph 13.20	These sewage treatment works also serve other parts of Hertfordshire, and it will therefore be necessary to work with neighbouring local authorities to take forward significant upgrades to these waste water treatment works where required, in order to support the planned levels of housing and employment growth. Further to this, where specific upgrades to waste water treatment works are required to deliver certain sites, it will be important for the land owner/ developer to work with Thames Water to <u>ensure that deliver the necessary infrastructure can be delivered</u> at an appropriate stage in the development process. and to ensure that the funding is in place to secure this.	To reflect Thames Water's changed approach and presented to the examination to funding new infrastructure.

Infrastructure

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/13/TBC	122/3	New paragraph after 13.20	<u>The Council will seek to ensure that there is adequate surface water, foul drainage and sewage treatment capacity to serve all new developments. Developers are encouraged to discuss their proposals with Thames Water ahead of the submission of any application to help ensure that any network reinforcement works are delivered in tandem with development. Where necessary phasing conditions will be used to ensure that any relevant phase of development is not occupied until any necessary network upgrades have been completed or it has been confirmed that sufficient capacity exists within the existing network.</u>	To reflect Thames Water's changed approach and presented to the examination to funding new infrastructure.

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/13/TBC	127/8	SP14; point i	i. The Council's housing target for the plan period leads to a requirement for additional secondary education capacity equivalent to three new secondary schools for the borough. Locations for two new secondary schools are identified <u>within proposed strategic housing sites</u> ; one within SDS5 (Hat1) at North West Hatfield and the other at Birchall Garden Suburb, east of Welwyn Garden City within the administrative area of East Hertfordshire District. <u>A site for the third new secondary school is identified at New Barnfield in</u>	To meet the infrastructure needs arising from the higher housing target.

Infrastructure

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<p><u>southern Hatfield, which is previously developed land within the Green Belt. The site of the former school buildings is also a Major Developed Site as defined in Policy SADM34 and shown on the Policies Map.</u> If available evidence indicates that a site for a third secondary school to serve the borough is required, the identification of this site should follow a sequential approach; sites within the urban area should be investigated first. If there are no suitable sites within the urban area, sites within the Green Belt will be considered if a case for very special circumstances can be demonstrated. Previously developed sites within the Green Belt should be considered before greenfield sites. The additional school capacity should be provided in a location well-related to the communities it is intended to serve.</p>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/13/TBC	128	SP14; point ii	<p>The Council's housing target for the plan period also leads to a requirement for new primary education capacity. In the case of the new neighbourhoods at SDS1 (WGC4), SDS2 (WGC5) and SDS5 (Hat1), the new village at SDS6 (Hat15) and the site east of Welwyn Garden City within the administrative area of East Hertfordshire District, locations for new</p>	<p>To meet the infrastructure needs arising from the higher housing target.</p>

Infrastructure

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			primary schools are identified within the proposed new developments. <u>New primary school sites are also identified within housing sites HS11 (Hat11) south of Hatfield and HS22 (BrP4) at Brookmans Park.</u> Other <u>Additional identified housing growth, however, may lead to the requirement for a further new primary school at Welwyn Garden City further primary education capacity.</u> <u>If available evidence indicates that this is the case, the identification of a site for this school location for this capacity should follow a sequential approach as set out in i. above</u>	

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
MM/13/TBC	128	Paragraph 13.56	<p>Justification</p> <p>13.56 To accord with the strategic objectives 1, 2 and 5 of the Local Plan, new schools should be located close to the populations they are intended to serve in order to reduce the need to travel and help foster community identity. New development of this type should preferably be located within the existing urban area or the proposed strategic housing allocations to be sustainable and to avoid unnecessary additional impacts on the openness of the Green Belt. <u>Where this is not</u></p>	To provide clarity on the sequential approach

Infrastructure

Mod Ref	Page No.	Policy/Para No.	Proposed Main Mod	Reason
			<u>possible, previously developed sites within the Green Belt should be considered before greenfield sites.</u>	