

Welwyn Hatfield Council

Sustainability Appraisal of Welwyn Hatfield Local Plan Adoption Statement

Final Report

Prepared by LUC

October 2023



Welwyn Hatfield Council

Sustainability Appraisal of Welwyn Hatfield Local Plan
Adoption Statement

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Chapter 1

Introduction

Adoption of the Welwyn Hatfield Local Plan

1.1 Welwyn Hatfield Council adopted the Welwyn Hatfield Local Plan on 12th October 2023.

1.2 During the preparation of the Local Plan, Welwyn Hatfield Borough Council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the Local Plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports which were published alongside the different versions of the Local Plan during its development.

Final Sustainability Appraisal Report

1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires Welwyn Hatfield to make the final SA Report available alongside the adopted Local Plan.

1.4 The final SA Report for the adopted Local Plan is the **August 2016 SA Report**, as amended by the **February 2020 SA Addendum** and **September 2021 SA Addendum**. The SA implications set out in the September 2021 SA Addendum are superseded by the **November 2022 SA Addendum**.

1.5 In the Inspector's Report published in September 2023, the Inspector confirmed that SA has been carried out and is adequate.

1.6 The most up to date, full SA Report is the Sustainability Appraisal Report to accompany the Welwyn Hatfield Proposed Submission Local Plan (hereafter referred to as the August 2016 SA Report). The Proposed Submission Local Plan and accompanying August 2016 SA Report were subject to consultation from August 2016 until October 2016 and the Local Plan, supporting evidence and consultation responses were submitted for Examination on 15th May 2017. An Errata Sheet was published in April 2017 to correct some minor errors in the SA Report prior to examination.

1.7 During the Local Plan examination, the Inspector noted that the Proposed Submission Local Plan should be updated to provide for an additional 4,000 homes. As such, the Council issued a further call for sites in January 2019. These sites were considered in terms of the Green Belt review, which has looked at the harm of releasing sites, as well as an updated

HELAA and infrastructure assessments. Proposed changes to the Local Plan were prepared by the Council in response to the issues raised by the Inspector and changes in circumstances since the Proposed Submission Local Plan was produced, to inform the Examination hearing sessions. These changes were reviewed to consider whether they would change any of the previous SA results. The changes are set out in the Proposed Changes to the Submitted Draft Local Plan 2016 (Site Allocations) consultation. The assessment of additional site options identified through the 2019 Call for Sites was detailed within the Addendum to the SA of the Local Plan Revised following January Cabinet meeting (hereafter referred to as the February 2020 SA Addendum).

1.8 Following the Stage 9 Hearings, the Inspector advised that the Proposed Submission Local Plan should be updated to provide for at least an additional 3,200 homes to meet the full objectively assessed housing need (FOAHN) of 15,200 homes over the plan period. In addition, one new site option was identified (Dig1: Land at 2 New Road) and one additional site option was considered to be a reasonable alternative (OMH6: Land to the east of Danesbury Park). An additional SA Addendum was prepared in September 2021 to appraise these changes (hereafter referred to as the September 2021 SA Addendum).

1.9 Following the Local Plan Examination hearing sessions held between 2017 and 2021, the Inspector stated that consultation on the Main Modifications could proceed. A schedule of Main Modifications to the local plan was prepared by Welwyn Hatfield Borough Council.

1.10 Main Modifications were prepared that would result in the delivery of 9,209 dwellings between 2023/24 and 2032/33 and 13,392 dwellings over the plan period 2016-36. The identified housing supply as set out in the Main Modifications includes additional housing sites in both the urban areas and villages, as well as revised site capacities on sites included within the Proposed Submission Local Plan (2016). Additional sites allocated in the Plan through Main Modifications comprised:

- SDS3 (Pea102): Bio Park, Broadwater Rd;
- HS12 (Han40a): Town Centre North- Campus East;
- HS31 (Pea104): YMCA, 90 Peartree Lane;
- HS34 (Hol23): Neighbourhood Centre, Hollybush Lane;
- HS38 (HC11): Meridian House, The Common;
- HS39 (HE17): Link Drive (Site F);
- HS40 (HC08): Lemsford Road (Site H);
- HS41 (HSW92): Minster Close;
- HS42 (HSW94): College Lane;

- HS43 (WE100): 51-53 London Road;
- HS44 (WeG1): 51 Welham Manor;
- HS44 (WeG3a): Land South of Wel Manor;
- HS46 (WeG10): Dixons Hill Road; and,
- HS47 (LHe4/5): Part of Studlands/Videne.

1.11 The proposed new village at Symondshyde to the northwest of Hatfield was deleted from the Plan having been found unsound by the Local Plan Inspector (SDS6 (Hat15): Symondshyde New Village). However, the overall spatial strategy remained.

1.12 Other sites deleted from the Proposed Submission Local Plan for soundness reasons comprised:

- HS7 (Hal02): Land at Waterside;
- HS24 (BrP7): Land south of Hawkshead Road;
- HS31 (No10): Land west of St Martin de Porres Catholic Church, Church Close; and
- HS34 (GTLAA09): Land opposite Hatfield Avenue, Coopers Green Lane.

1.13 The site appraised in the September 2021 SA Addendum (Dig1: Land at 2 New Road) was no longer proposed to be allocated, and was not considered a reasonable alternative, as there was no evidence to suggest that access to the site was achievable.

1.14 The Main Modifications also included proposed changes to provide clarity, strengthen Local Plan policies and incorporate additional mitigation of effects identified in the SA. The November 2022 SA of Main Modifications (hereafter referred to as the November 2022 SA Addendum) considered the Schedule of Main Modifications.

1.15 Further Main Modifications were proposed by the Local Plan Inspector in June 2023. A July 2023 SA Addendum was produced to consider these. The Further Main Modifications related to minor policy changes and corrections. The July 2023 SA Addendum concluded that the findings previously recorded in the August 2016 SA Report and subsequent addendums and erratum would not be altered as a result of the Further Main Modifications.

1.16 The final SA Report for the adopted Local Plan is the **August 2016 SA Report**, as amended by the **February 2020 SA Addendum** and **September 2021 SA Addendum**. The SA implications set out in the September 2021 SA Addendum are superseded by the **November 2022 SA Addendum**.

Requirement for the Adoption Statement

1.17 The SEA Regulations¹ also require a number of steps to be taken upon adoption of a plan (in this case the Welwyn Hatfield Local Plan). Specifically, SEA Regulation 16 sets out the post adoption procedures and requirements for SEA. The planning authority must, as soon as is reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public, Historic England, Natural England and the Environment Agency about the availability of these documents. The SEA adoption statement must explain:

- How environmental (and sustainability) considerations have been integrated into the Plan.
- How the Environmental Report has been taken into account during the preparation of the Plan.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and the Environmental Report have been taken into account.
- The reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Plan.

1.18 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Welwyn Hatfield Local Plan. The remainder of the document is structured according to the SEA Regulations requirements listed above as follows:

- Chapter 2 summarises how environmental considerations have been integrated into the Local Plan including by explaining who carried out the SA/SEA and what assessment framework was used.
- Chapter 3 summarises how the Environmental Report has been taken into account, considering the links between the plan-making and SA/SEA process.
- Chapter 4 summarises the consultation opinions provided on the Environmental Report at each stage and describes how the results were taken into account.
- Chapter 5 describes why the adopted Local Plan was chosen, in light of the other reasonable alternatives dealt with.

- Chapter 6 describes how the significant environmental effects of the implementation of the Local Plan will be monitored.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit)

Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531)

Chapter 2

How environmental considerations have been integrated into the Local Plan

Sustainability Appraisal (incorporating SEA)

2.1 The SA (incorporating SEA) of the Welwyn Hatfield Local Plan started in December 2007, with a scoping exercise reported in the Welwyn Hatfield Local Development Framework Sustainability Appraisal Scoping March 2008 (thereafter referred to as March 2008 SA Scoping Report). LUC produced the SA Scoping Report. The March 2008 SA Scoping Report was subject to consultation from March to May 2008. An additional SA Scoping Report was prepared in August 2014 (hereafter referred to as August 2014 SA Scoping Report) and provided to the statutory consultation bodies (Environment Agency, Natural England and Historic England) in order to update and reflect the plan preparation and SA process at that time. An additional scoping report was required as Welwyn Hatfield had decided to no longer proceed with a Development Framework. LUC was appointed by Welwyn Hatfield Council in 2007 and has carried out all SA work since that point (with input from Welwyn Hatfield Council), including the preparation of this SA/SEA Adoption Statement.

2.2 The purpose of the SA was to assist Welwyn Hatfield Council in preparing the Local Plan by identifying the key sustainability issues that face Welwyn Hatfield, to predict what the likely effects of the Local Plan on these issues would be, and to put forward recommendations to mitigate and monitor effects identified. The aim was to help ensure that the Local Plan has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible.

2.3 The SA was undertaken iteratively, such that at each stage of the Local Plan's preparation, the sustainability and environmental effects of the options for the Plan were assessed. The SA assessed a range of options for the Local Plan, and the Council considered the SA findings to inform which options to take forward and what mitigation may need to be incorporated in the Local Plan to address any adverse effects identified by the SA. Information on the options considered in the plan making process and assessed through the SA process is set out in Chapter 2 of the August 2016 SA Report. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed. Chapter 3 expands on how the findings of the SA

process have been taken into account through the plan-making process.

2.4 The way in which the environmental and sustainability effects of the Local Plan were consistently described, analysed and compared was through the use of a set of SA objectives referred to as an 'SA framework'. The SA framework was used to appraise the Welwyn Hatfield Local Plan and was developed during the Scoping stage of the SA process in 2008 and was consulted upon as part of the SA Scoping Report in March to May 2008. The six long-term objectives of Welwyn Hatfield's Corporate and Community Plan 2015 were used as a basis for the SA Objectives. An additional SA Scoping Report was produced in August 2014. The purpose of the Additional Scoping Report was to set out the methodology for undertaking the SA, including the assumptions that were used by which the likely effects of the potential site allocations in the emerging Local Plan can be assessed. It was not intended to replace the earlier SA work, but to supplement it, in order that the consultees could provide their views on the approach that was used with respect to the scope and level of detail of the SA work during this stage of the plan preparation. The SA objectives were identified at the Scoping stage, taking into account the information collated in the review of plans and programmes, baseline analysis, and identification of sustainability issues. The SA objectives were reviewed at the additional scoping stage with amendments made.

2.5 The SA framework is presented below and was used to test options considered for the Local Plan, including strategic, policy and site options. The SA framework was accompanied by a series of assumptions, setting out how geographically-specific options (such as strategic locations and site allocation options) would be assessed against this framework.

2.6 The 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives within the Framework:

- Long-term Objective 1: Health improvement
 - lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)
 - lead to improved health for all? (1.2)
- Long-term Objective 2: Safer communities
 - reduce opportunities for crime and antisocial behaviour, and reduce fear of crime? (2.1)
 - ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)
- Long-term Objective 3: Good citizenship
 - encourage involvement of the public in the planning process? (3.1)
- Long-term Objective 4: Improving the environment
 - Significantly reduce greenhouse gas emissions from built development? (4.1)
 - significantly reduce greenhouse gas emissions from transport? (4.2)
 - avoid and reduce air pollution? (4.3)
 - protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)
 - conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings? (4.5)
 - protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)
 - reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)
 - avoid water pollution? (4.8)
 - minimise the amount of waste generated and maximise the re- use, recycling or composting of waste that cannot be reduced? (4.9)
 - promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)
- Long-term Objective 5: Decent housing
 - provide the right amount, type and tenure of housing to meet identified local needs? (5.1)
- Long-term Objective 6: A thriving economy
 - ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy? (6.1)
 - encourage economic investment in those areas most in need of regeneration, in a way that will benefit those most in need of rewarding employment? (6.2)
 - enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)

- sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)
- avoid the sterilisation of mineral resources? (6.5)
- provide access to training, skills development and lifelong learning to meet identified needs? (6.6)

2.7 The SA Framework was updated numerous times during the Local Plan process. At each iteration of the SA the SA Framework was included in the appendices of the SA Reports.

Habitats Regulations Assessment

2.8 The Local Plan was also subject to the Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended)² (and previous versions of these Regulations, as applicable at the time of preparing each stage of the HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Local Plan was undertaken and reported on separately from the SA by LUC.

2.9 The HRA Report that was submitted alongside the Local Plan was prepared in June 2016 in relation to the Proposed Submission Local Plan. A revised HRA Report was prepared in February 2020 to incorporate updates to the Local Plan as a result of additional sites allocated.

2.10 An additional HRA Report was prepared in November 2022 to consider the implications of the Schedule of Main Modifications to the Proposed Submission Plan for the HRA findings reported previously. It concluded that the Welwyn Hatfield Local Plan can be considered compliant with the Habitats Regulations as it would not result in adverse effects on integrity on any European sites. The sites considered in the HRA are: Epping Forest SAC, Wormley-Hoddesdonpark Woods SAC and Lee Valley SPA and Ramsar Site. An addendum to this HRA Report was prepared in July 2023. It considered whether the Further Main Modifications were likely to alter the HRA conclusions. No changes were needed to the conclusions of the November 2022 HRA Report.

² The Conservation of Habitats and Species Regulations 2017

Chapter 3

How the Environmental report has been taken into account

3.1 As explained above, the SA process for the Welwyn Hatfield Local Plan was undertaken iteratively with the SA Reports at each stage informing the Plan. As part of the SA process, an assessment of the likely sustainability and environmental effects of the plan was made at each stage of the Local Plan's development.

3.2 The SA assessed all sites, policies and proposals in each iteration of the Local Plan and their reasonable alternatives, including the Schedule of Main Modifications and further Main Modifications made to the Local Plan following its submission. This helped Welwyn Hatfield Council to formulate its approach with regards to which options to take forward, alongside other material planning considerations.

3.3 The preparation of the SA Reports (which meet the requirements of an 'Environmental Report' under the SEA Regulations) at each stage of the Local Plan's preparation, and how the SA was taken into account are set out below, according to the relevant Local Plan consultation stage.

Issues and Options (March 2009)

3.4 The Issues and Option document set out a range of alternatives for the Local Plan. All were subject to SA, the results of which were shared with the Council and published for consultation alongside the Issues and Options document. These documents were subject to consultation from March to May 2009. Alternatives were considered for the following areas:

- Distribution of housing growth;
- Settlement strategy;
- Distribution of employment land and level of growth; and,
- Growth scenarios for housing.

3.5 Key issues and options on which views were sought included how best to protect the environment and address climate change, how to raise quality of life and ensure communities are sustainable, and how to make provision for the required levels of growth (including 10,000 homes, the Regional Spatial Strategy (RSS) target). Strategic and more detailed policy options were put forward, along with potential broad locations for growth. The sustainability advantages and disadvantages of each option were reported within the Issues and Options Report.

Emerging Core Strategy

3.6 The SA Report for the Welwyn Hatfield Core Strategy (thereafter referred to as the September 2012 SA Report) was produced alongside the Emerging Core Strategy published for consultation at the same time. The September 2012 SA report contained the SA methodology, key sustainability issues and the findings of the emerging Core Strategy. This included the appraisal of the vision and objectives and each policy including broad locations of growth against the SA Objectives.

2015 Local Plan Consultation Document

3.7 Following publication of the National Planning Policy Framework (NPPF), Welwyn Hatfield Council decided to progress a Local Plan instead of a Core Strategy. The 2015 Local Plan Consultation Document explained that the Local Plan would combine the strategic policies of the Emerging Core Strategy with site allocations and development management policies. A review of the evidence for growth, and the identification of a higher objectively assessed need for housing (around 12,500 homes over 20 years) meant some major changes were required to strategic policies, both in terms of how much growth would be accommodated, and its distribution, and these were set out in the consultation. The consultation sought views on additional housing sites, and sites for Gypsies and Travellers. New site allocation options were also included for employment land, cemeteries and a major developed site in the green belt, as well as protective designations for retail centres and urban open land. Consultation took place between January and March 2015.

Welwyn Hatfield Local Plan 2032

3.8 The Welwyn Hatfield Local Plan 2032 document is referred to as the Proposed Submission Plan. The relevant SA Report was the Sustainability Appraisal report to accompany the Welwyn Hatfield Proposed Submission Local Plan (August 2016 SA Report). The Proposed Submission Local Plan comprised:

- An Overarching Strategy comprising the Vision and Objectives; Strategic Policies on Delivering Sustainable Development, Targets for Growth, and Settlement Strategy and Green Belt Boundaries; a Development Management Policy for Windfall Development (SADM1); and a Key Diagram.
- Topic Specific strategic and development management policies covering Transport and Travel; Centres, Services and Facilities; Housing; Economy; Quality of New Development; Environmental Assets; and Infrastructure.

- Settlement Policies for Welwyn Garden City and Hatfield, the larger villages, proposed new village and rural areas.

- Implementation and Monitoring.

3.9 The August 2016 SA Report set out the appraisals of the Local Plan policies and site allocations. In general, the options and policy approaches that were taken forward in this version of the Local Plan were those that performed more positively or at least as well against the SA objectives than the rejected options, although in some cases other planning considerations determined which options should be taken forward.

Submission to the Secretary of State

3.10 The August 2016 SA Report was submitted to the Secretary of State alongside the Proposed Submission Local Plan on 15th May 2017.

Examination

3.11 Examination of the Welwyn Hatfield Local Plan took place from May 2017 to September 2023. Four addenda to the August 2016 SA Report were produced to support the Local Plan Examination and assess main modifications to the Local Plan, as set out below.

Welwyn Hatfield Local Plan 2032 Schedule of Main Modifications (2022)

3.12 The Welwyn Hatfield Local Plan 2032: Schedule of Main Modifications to the Sustainability Appraisal of the Welwyn Hatfield Local Plan (2022) (hereafter referred to as November 2022 SA Addendum) was prepared to assess and describe the likely sustainability effects of the Main Modifications. This was published alongside the Main Modifications for consultation from January to February 2023.

3.13 The SA Addendum concluded that, while the assessment of some policies would change in response to these modifications, the overall sustainability of the Local Plan is not considered to be changed by the Main Modifications.

Welwyn Hatfield Local Plan 2032 Further Main Modifications (2023)

3.14 In June 2023, further Main Modifications to the submitted Local Plan were identified. The Welwyn Hatfield Local Plan: Main Modifications Addendum to the Sustainability Appraisal of the Welwyn Hatfield Local Plan (2023) (hereafter referred to as July 2023 SA Addendum) was prepared to assess the implications of these further main modifications.

3.15 It was concluded that the further main modifications did not alter any of the SA findings previously recorded in the August 2016 SA Report and the subsequent addendum

reports and erratum, including the November 2022 Main Modifications SA Addendum.

Adopted Welwyn Hatfield Local Plan (2023)

3.16 This Adoption Statement summarises the SA/SEA process and how this has influenced the preparation of the Welwyn Hatfield Local Plan.

Chapter 4

How opinions of consultation bodies and the public have been taken into account

4.1 At each stage of the Welwyn Hatfield Local Plan's development, an SA Report was published alongside the Local Plan document for consultation with the public and the consultation bodies specifically referred to in the SEA Regulations (Historic England, the Environment Agency and Natural England). The SEA Regulations require that the SEA Adoption Statement provides an account of how any opinions expressed by the public and the consultation bodies have been taken into account.

4.2 The Local Plan consultation stages and responses received relating to the SA documents are summarised below.

March 2008 SA Scoping Report

4.3 The SA Scoping Report was subject to consultation in March 2008, including formal consultation with the SEA statutory bodies (Historic England, the Environment Agency and Natural England).

4.4 This provided an opportunity for comments on the proposed scope and level of detail of the SA, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the Local Plan and whether the review of relevant plans, policies and programmes (the 'PPP' review) and baseline information were appropriate and complete.

4.5 Comments received on the SA scoping were taken into consideration and addressed in the August 2016 SA Report. A number of amendments were made to the review of plans and programmes and the SA Framework. Full details of how each response was addressed were set out in Appendix 1 of the SA Report.

September 2012 SA Report

4.6 The SA Report of the Emerging Core Strategy was subject to consultation between November 2012 to January 2013. Many of the consultation responses received in relation to the SA Report focused on housing target and SA appraisals, including comments from consultees, individuals and developers. Full details of how each response was addressed were set out in Appendix 1 of the August 2016 SA Report.

August 2014 SA Scoping Report

4.7 The additional SA Scoping Report was subject to consultation in August to September 2014, including formal consultation with the SEA statutory bodies (Historic England, the Environment Agency and Natural England).

4.8 This provided an opportunity for consultees to comment on the proposed scope and level of detail of the SA, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the Local Plan and whether the review of relevant plans, policies and programmes (the 'PPP' review) and baseline information were appropriate and complete.

4.9 Comments received on the SA scoping were taken into consideration and addressed in the August 2016 SA Report. A number of amendments were made to the baseline information and key sustainability issues. Full details of how each response was addressed were set out in Appendix 1 of the SA Report.

August 2016 SA Report

4.10 The SA Report for the Proposed Submission Local Plan (August 2016) accompanied the Proposed Submission Local Plan for consultation between August and October 2016. Many of the consultation responses received in relation to the SA Report focussed on SA methodology, site appraisals, designation of a new settlement at Symondshyde and appraisal of reasonable alternatives. The consultation responses were submitted for Examination in May 2017.

February 2020 SA Addendum

4.11 The SA Addendum accompanied the Consultation on proposed changes to the submitted Draft Local Plan (site allocations) 2020 for consultation which closed on the 1st May 2020. The February 2020 SA Addendum included the appraisal of additional reasonable alternative site options identified through the 2019 Call for Sites. Many of the consultation responses received in relation to the SA Report focussed on the site appraisals.

September 2021 SA Addendum

4.12 An SA Addendum was produced following the Stage 9 Hearings where the Inspector advised that the Local Plan should provide for additional homes over the plan period. Therefore, the September 2021 SA Addendum appraised two additional reasonable alternative site options and two alternative strategic options for growth. The previous SA conclusion remained valid, however updates were made to the strategic growth options appraisal and site SB1: Land South of Swanley Bar Lane was reassessed. The cumulative effects on SA Objective 5.1 (Housing were considered to be significant

positive effect instead of minor positive effect. The September 2021 SA Addendum was sent to the Inspector for consideration.

November 2022 SA Addendum

4.13 Following the Local Plan Examination hearing sessions held between 2017 and 2021, a November 2022 SA Addendum was prepared and published for public consultation alongside the Council's Schedule of Main Modifications between January and February 2023. The Main Modifications were subject to SA, including an assessment of the following sites to facilitate the delivery of additional housing:

- SDS3 (Pea102): Bio Park, Broadwater Rd;
- HS12 (Han40a): Town Centre North- Campus East;
- HS31 (Pea104): YMCA, 90 Peartree Lane;
- HS34 (Hol23): Neighbourhood Centre, Hollybush Lane;
- HS38 (HC11): Meridian House, The Common;
- HS39 (HE17): Link Drive (Site F);
- HS40 (HC08): Lemsford Road (Site H);
- HS41 (HSW92): Minster Close;
- HS42 (HSW94): College Lane;
- HS43 (WE100): 51-53 London Road;
- HS44 (WeG1): 51 Welham Manor;
- HS44 (WeG3a): Land South of Wel Manor;
- HS46 (WeG10): Dixons Hill Road; and,
- HS47 (LHe4/5): Part of Studlands/Videne.

4.14 The proposed new village at Symondshyde was deleted from the Plan (SDS6 (Hat15): Symondshyde New Village). Other sites deleted from the Plan were:

- HS7 (Hal02): Land at Waterside;
- HS24 (BrP7): Land south of Hawkshead Road;
- HS31 (No10): Land west of St Martin de Porres Catholic Church, Church Close; and,
- HS34 (GTLAA09): Land opposite Hatfield Avenue, Coopers Green Lane.

4.15 The site proposed to be allocated in the September 2021 SA addendum (Dig1) was no longer proposed to be allocated.

4.16 The Main Modifications also included proposed changes to provide clarity, strengthen Local Plan policies and incorporate additional mitigation of effects identified in the SA.

4.17 The Council published the consultation responses received in relation to the Schedule of Main Modifications

consultation on their website. The consultation comments and responses, Schedule of Main Modifications (2022) and accompanying November 2022 SA Addendum were sent to the Inspector for consideration in preparing the Inspector's report.

July 2023 SA Addendum

4.18 The Inspector reviewed the responses submitted to the Local Plan Main Modifications consultation and proposed Further Main Modifications to the Plan. The SA implications of these were appraised in the July 2023 SA Addendum which was published for public consultation between June and July 2023. This iteration of modifications took into account comments received in relation to the Schedule of Main Modifications. As the Schedule of Main Modifications set out modifications to the submitted Local Plan, the further Main modifications and the July 2023 SA Addendum supersede the Schedule of Main Modifications and accompanying SA Addendum.

4.19 The Council published the consultation responses received in relation to the Further Main Modifications consultation on their website. The consultation comments and responses, Schedule of Further Main Modifications (2023) and accompanying July 2023 SA Addendum were sent to the Inspector for consideration in preparing the Inspector's report.

Chapter 5

Why the adopted Local Plan was chosen in light of the other reasonable alternatives considered

5.1 Welwyn Hatfield Borough Council (WHBC) considered a range of reasonable alternative options during the preparation of the Local Plan, particularly in relation to strategic policies addressing the scale and distribution of additional growth. Alternative options for development site allocations and policy options were also considered.

5.2 Information considered by Welwyn Hatfield Borough Council before final decisions were made included:

- the SA findings, particularly the significant effects generated by each option.
- the Local Plan's vision and objectives.
- results of consultation and engagement with the general public and key stakeholders.
- the evidence base for the Local Plan.

5.3 The options considered for the Local Plan are described below alongside a summary of WHBC's reasons why the preferred options were selected over the reasonable alternatives.

Vision and objectives

5.4 The Local Plan sets out the policies and plans to guide the future development of Welwyn Hatfield in the period up to 2032. It identifies the scale of development required during this period and the key locations to meet this need. The Local Plan identifies 13 objectives covering historic environment; reducing the impact on the environment; encouraging sustainable development and supporting town centres; Welwyn Garden City; meeting housing need; sustainable transport; and supporting rural economy and employment growth.

5.5 The Vision and Objectives are at a high-level and are aspirational. The Vision and Objectives were originally appraised when the Council was working towards producing an Emerging Core Strategy through the September 2012 SA Report. At that stage no reasonable alternative were identified by the Council. The vision and objectives were re-appraised at Proposed Submission stage of the Local Plan after a decision was taken to progress with a Local Plan instead. Modifications to a number of objectives were made at the Main Modifications stage, however, the changes did not effect the overall intention of the objectives. The final version of the

Vision and Objectives are contained within the adopted Local Plan.

How Much Housing Growth

Issues and Options Stage 2009

5.6 The identified need for employment land at the Issues and Options Stage could be accommodated on existing sites without the need for a Green Belt review, so the main focus was on the need to accommodate housing growth.

5.7 At the Issues and Options Stage, the housing target was derived from the East of England Plan (10,000 homes to 2031). However, following a legal challenge, the part of the East of England Plan identifying a housing target for Welwyn Hatfield was quashed. Subsequently, the government announced its intention to revoke all Regional Strategies. A local target was therefore sought to replace the regional target.

'How Many New Homes?' Housing Targets Consultation, June-July 2011

5.8 In June and July 2011, the Council sought views on how many new homes should be built in the Borough between 2011 and 2031. Five alternative targets were set out, together with a summary of the advantages and disadvantages of each target identified through a SA.

5.9 Five alternative targets for housing growth between 2011-2031 were considered:

1. 2,925 (focus on urban capacity).
2. 5,800 (a continuation of the Borough's provisional housing target and the Option 1 target from the Draft review of the East of England Plan >2031).
3. 7,600 (a continuation of the long term delivery trend).
4. 10,000 (the pre-legal challenge East of England Plan 2008 target and the basis for the Issues and Options Paper in 2009).
5. 14,400 to reflect government estimates for household growth.

Alternative Target Scenarios

5.10 Further technical work was carried out following the publication of the 'How many new homes?' consultation to establish the evidence base for a locally derived target, based on a range of scenarios relating to demographic projections, economic forecasting, affordability indicators, previous delivery trends, the regional spatial strategy and urban capacity estimates, as well as infrastructure considerations. A

total of 24 scenarios were reported in Housing Background Paper Part 1.

5.11 The 24 scenarios included five scenarios consulted upon in the 'How Many Homes?' Growth Scenarios Consultation.

5.12 Other scenarios considered comprised demographic scenarios based on the East of England Forecasting Model and Greater Essex Demographic Forecasts, economic or employment based scenarios, and affordability based scenarios.

Emerging Core Strategy 2012

5.13 The housing target that was selected by the Council in the Emerging Core Strategy was at the lower end of the range of scenarios considered. It therefore risked not delivering the amount of housing that was needed in Welwyn Hatfield. The Council considered such a scale of housing and related development not to be insignificant. It would have resulted in an increase of 15.7% in the housing stock of Welwyn Hatfield over the 18 year period. This would be likely to have environmental impacts and place demands on infrastructure and community facilities, such as schools and hospitals. It would also require some revisions to the Green Belt.

5.14 Taking all these factors into account, providing for an additional 8,000 dwellings between 2011 and 2031 (7,200 over the 18 year period to 2029), was considered by the Council to be a cautious but realistic approach in social and economic terms, and one that sought to give environmental factors and the concerns of local people due weight.

Local Plan Consultation Document 2015

5.15 Following the Emerging Core Strategy consultation and the decision to progress a Local Plan, a further review of the evidence for growth in relation to housing need was undertaken, along with a review of the distribution strategy.

5.16 Welwyn Hatfield's updated objectively assessed housing need (OAN) was 12,500 dwellings, but a new housing target was set following consultation on the site options, further transport modelling and viability testing. However, the overall housing target for the plan period was below the objectively assessed housing need.

Proposed Submission Local Plan 2016

5.17 The Objectively Assessed Need (OAN) for housing was reviewed as part of the 2015 Partial Update of the Strategic Housing Market Assessment (SHMA), which recommended a figure of 12,616-13,433 homes over the 19 year period from 2013-2032. The OAN was reviewed again as part of the update to the Economy Study, and the Council concluded it remained appropriate.

5.18 Due to the significant shortfall between the capacity of sites within the built up area (urban capacity sites), other non-Green Belt sites (including safeguarded land), and the OAN, and the recommendations of the SA of the Emerging Core Strategy which highlighted that a focus on the two main towns may not meet the needs of the villages, the Council decided to undertake a Green Belt review, and to consider releasing land from the Green Belt around the larger villages, and as a new settlement.

5.19 The housing target was informed both by the OAN, and by consideration of potential allocations (strategic sites plus smaller key sites), and the deliverability of these sites. This included the impact of allocating land on environmental, economic and social policy objectives, as informed by the SA. There has therefore been a combination of a site based (suitability and deliverability of sites) and need based (OAN) approach to identifying the housing target. The housing target is intrinsically linked to the settlement strategy.

5.20 The Proposed Submission Local Plan included a housing target of around 12,000 homes. This was a considerable increase on the Emerging Core Strategy target of 7,200 and a more realistic reflection of local need. However, there remains a shortfall in relation to the OAN of around 600-1,430 homes. The shortfall relates to the later part of the plan period, beyond 2027. Through the examination of the Plan, Welwyn Hatfield were required to identify sites to deliver 3,200 additional homes reaching a target of 15,000 over the plan period.

How Much Employment Growth

Issues and Options 2009

5.21 The following options were assessed through the SA which was included in the Issues and Options Consultation. The options comprised:

- Option PG1: Choose to keep roughly the same number of jobs in the Borough as we have now to create a match between jobs and housing?
- Option PG2: Allow the number of jobs in the Borough to rise to reflect the number of new homes to be built?
- Option PG3: Provide jobs for people in neighbouring areas as a way of promoting the Hatfield and Welwyn Garden City as a Key Centre for Development and Change?
- Options PG4-PG10 relating to the type (and location) of employment land to be provided comprised: focusing on knowledge based industries (e.g. close to the university), providing new sites focused on warehousing and distribution, regenerating existing employment areas, providing new employment development close to

existing and proposed homes, protecting employment provision in villages and rural areas, remodelling existing employment sites to include other uses, retaining existing employment sites.

5.22 In relation to the number of jobs Welwyn Hatfield should provide for, the strategy taken forward to the Emerging Core Strategy combined options PG2 and PG3 as the two towns will continue to provide jobs for those who live outside Welwyn Hatfield. However the strategy also sought to maintain current levels of alignment of jobs to housing based on forecasting. Therefore, 308ha of employment land was identified.

Local Plan Consultation Document 2015

5.23 Since consultation on the Emerging Core Strategy finished, a further Economy Study was commissioned, which considered a number of different scenarios for the local economy. It concluded that the Council should plan for an increase of 9,800 to 12,000 jobs in Welwyn Hatfield from 2013 to 2031. It also identified that less land may be required due to the trend towards more efficient use of office space and a reduction in manufacturing.

Proposed Submission Local Plan 2016

5.24 Since the Local Plan Consultation Document 2015 was produced, there were further updates to the evidence base. As the economy has recovered, the density of jobs to workers in Welwyn Hatfield increased. The Economy Study Update 2015 informed the strategy for employment land in the Proposed Submission Local Plan. This considered three scenarios for job growth between 2013 and 2032, which had predicted increases ranging from 15,960-17,900 jobs, with variations in the type of jobs predicted (e.g. one scenario considered higher levels of jobs in the warehousing and distribution sector would occur). Therefore, the Economy Study Update recommended taking a hybrid approach, arriving at a predicted increase of about 16,900 jobs over the plan period. The Economy Study Update identified a shortfall of employment land of 5.4ha by 2032. As such, it recommended protecting existing sites in employment use.

5.25 Overall, the Proposed Submission Local Plan stated that the identification of employment land would accommodate for an increase of around 14,500 jobs. While this was lower than the predicted requirement for the increase in jobs over the plan period, the shortfall was made up for by the increase in jobs of 2,600 that occurred between 2013-2014, giving a total of 17,100 jobs.

How Much Retail Growth

5.26 The Council's focus was on supporting Welwyn Garden City town centre as a retail centre, and seeking to regenerate

Hatfield town centre, rather than increasing the role and size of out of town retail provision.

Issues and Options 2009

5.27 At the Issues and Options Stage, no further need for out of town growth was identified. The strategy for retail focused on supporting the town centres, including the regeneration of Hatfield town centre and meeting at the minimum need identified in the latest Town Centre and Retail Needs Assessment.

Emerging Core Strategy 2012

5.28 The Emerging Core Strategy included provision for around 19,200 square metres (gross) additional floorspace by 2029.

Local Plan Consultation 2015

5.29 No changes were made to the approach to retail growth.

Proposed Submission Local Plan 2016

5.30 The Council's strategy continued to be to maintain and enhance the vitality, viability and economic prosperity of Welwyn Hatfield's town, neighbourhood and village centres. An increase in retail floorspace of 12,500 square metres to meet the predicted growth in expenditure to 2026 within existing centres, and to support strategic development sites was included in the Proposed Submission Local Plan. This was a smaller allocation than proposed in the Emerging Core Strategy, but reflects the evidence base at the time.

5.31 The policy was informed by the Retail and Town Centre Needs Assessment Update (May 2016).

Settlement Strategy and Alternative Spatial Options

5.32 The settlement strategy options considered in the preparation of the Local Plan focused on the alternatives for the distribution of housing growth, as the primary requirement for identifying broad locations for development which would need to be released from the Green Belt.

Core Strategy Issues and Options 2009

5.33 The consultation sought views on three main issues: density of development (with a view to informing how much Green Belt land would be required), coalescence of settlements (to inform possible broad locations for development) and the broad approach to distributing housing growth based on a series of high level options. This was followed by questions seeking views on where growth might be best located, considering a series of broad locations for

growth around the main towns of Welwyn Garden City and Hatfield, and around the large and small inset villages.

5.34 The following options were put forward for the distribution of housing growth in the Issues and Options Report:

- Option PG31 Proportionate Distribution
- Option PG32 Growth concentrated in urban extensions

5.35 For Option PG32, respondents were asked indicate which of the following options they would prefer:

- a. Growth focused mainly around Welwyn Garden City;
- b. Growth focused mainly around Hatfield;
- c. Growth focused mainly around both Welwyn Garden City and Hatfield.

5.36 An additional option PG36A was included, for growth to the west of the redeveloped part of Hatfield Aerodrome, to include land within St Albans District. Options for large scale expansion around one or more of Welwyn Hatfield's villages (Options PG39-46) were also included in the event that Options PG31 and PG32 were found not to deliver sufficient growth.

Emerging Core Strategy 2012

5.37 Six Distribution Options were considered by the Council to inform the Emerging Core Strategy:

- Urban Capacity.
- Option 1 - Proportionate Distribution (Option PG31 of Issues and Options Report).
- Option 2 – Growth mainly focused towards Welwyn Garden City (Option PG32a of Issues and Options Report).
- Option 3 – Growth mainly focused towards Hatfield (Option PG32b of Issues and Options Report).
- Option 4 (the preferred option) – Growth focused mainly towards Welwyn Garden City and Hatfield (PG32c of Issues and Options Report).
- Option 5 - Growth focused on the two towns and the large-scale expansion of one or more of the Large Excluded Villages (draws on Options PG32c and PG39-46 of Issues and Options Report).
- Option 6 - Growth mainly directed towards Welwyn Garden City and Hatfield with limited growth around Large Excluded Villages (combination and variation of Options PG31 and PG32c of Issues and Options Report).

5.38 The spatial distribution taken forward into the Emerging Core Strategy was Option 4 – Growth focused mainly towards Welwyn Garden City and Hatfield. Option 6 was considered to be a reasonable alternative by the Council.

Draft Local Plan Consultation Document 2015

5.39 The SA of the Emerging Core Strategy identified that the proposed focus of development on the two main towns of Welwyn Garden City and Hatfield could lead to some of the villages not being able to meet their needs. In response to the review of the evidence base for growth, along with the findings of the SA and greater support from consultation comments for a more proportionate distribution of housing, the Local Plan Consultation Document proposed a greater proportion of development at the villages, whilst still retaining an urban focus.

5.40 Draft Local Plan Consultation Document set out a more dispersed and proportionate approach to the distribution of development across Welwyn Hatfield than was proposed in the Emerging Core Strategy. The distribution would continue to focus primarily on Welwyn Garden City and Hatfield, while also seeking to deliver a greater proportion of development in and around villages, combining Options 1 and 6. The intention to prioritise development of previously developed land remained.

5.41 The settlement strategy put forward in the Local Plan Consultation Document, to follow a more proportionate approach, was carried forward into the Proposed Submission Local Plan.

5.42 The consideration of strategic and key sites was also informed by the settlement strategy. The identification of strategic and key sites within Welwyn Hatfield, alongside an allowance for windfall development, and a small allowance for the non-implementation of permitted sites, will provide around 12,000 dwellings over the plan period. These sites are not identified in the settlement strategy.

5.43 During examination of the Proposed Submission Local Plan the housing provision was increased twice. The Council was required to provide for an additional 3,200 homes to meet the objectively assessed housing need of 15,000 homes over the plan period. However, the overall strategy remained.

Strategic site selection

5.44 The Council prepared a new Strategic Housing Land Availability Assessment (SHLAA) which considered the development of land at 228 sites across urban areas and villages which were promoted for development or appraised by officers across Welwyn Hatfield. The SHLAA also set out estimates of the amount of housing likely to come forward in the future from sites within existing towns and villages, as well

as those sites which already have planning permission. Based on the emerging findings of the SHLAA at the time, options for providing for new development were identified. Through the SHLAA sites that were deemed unsuitable were dismissed. A total of 44 allocated site options and 29 reasonable alternative site options were appraised through the August 2016 SA Report.

5.45 A further call for sites was undertaken in January 2019. These sites were considered in terms of the Green Belt review, which looked at the harm of releasing sites, as well as an updated HELAA and infrastructure assessments, and the SA work. A total of 41 additional allocated sites and 47 additional reasonable alternatives were identified by Welwyn Hatfield and these were subject to SA and assessed in early 2020.

5.46 Through the main modifications a total of 14 sites identified by Welwyn Hatfield were allocated. These sites were subject to SA and assessed in late 2022. In addition, a total of seven sites were de-allocated which include the proposed new village at Symondshyde.

5.47 Appendix 5 of the August 2016 SA Report and Appendix E of the November 2022 SA Report sets out further information in relation to the reasons for selecting or not selecting site options.

Chapter 6

How significant environmental effects of the implementation of the Local Plan will be monitored

6.1 The SEA Regulations require that “The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” (Regulation 17), and that the Environmental Report should provide information on “a description of the measures envisaged concerning monitoring” (Schedule 2).

6.2 The Planning Practice Guidance (PPG) on SA states that it is not necessary to monitor everything and monitoring should be focused on the significant sustainability effects, including significant effects where there is uncertainty and where monitoring would enable preventative or mitigation measures to be taken. However, in order to address the requirement in SEA Regulation 17 noted above to “identify unforeseen adverse effects at an early stage and be able to undertake appropriate remedial action”, and taking precautionary approach, measures have been proposed to monitor sustainability effects for all the objectives in the SA framework.

6.3 The indicators recommended to be used by Welwyn Hatfield Council to monitor the potential sustainability effects of implementing the Local Plan are set out by each SA objective below (* indicators not currently included in the Local Plan monitoring framework to be monitored if information is readily available):

- Lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)
 - Number of deprived Lower Super Output Areas (LSOAs) (AMR)
 - Borough health profile and life expectancy (AMR)
- Lead to improved health for all? (1.2)
 - Borough health profile and life expectancy (AMR)
- Reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)
 - Number of recorded incidences of crime (AMR)
- Ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)
 - Planning applications granted contrary to Environment Agency advice (AMR)

- Spatial extent of flood zones 2 and 3
- Residential properties flooded from main rivers
- Distance to 'Areas susceptible to surface water flooding' – EA Maps
- Number or % of permitted developments incorporating SuDS
- Encourage involvement of the public in the planning process? (3.1)
 - Public perception on involvement in the planning process
 - Number of neighbourhood plans adopted
 - Extent of resident population of the Borough living in an area with an adopted neighbourhood plan
- Significantly reduce greenhouse gas emissions from built development? (4.1)
 - Renewable energy generation (AMR)*
 - Carbon emissions by source (ONS/DECC)
- Significantly reduce greenhouse gas emissions from transport? (4.2)
 - Carbon emissions by source (ONS/DECC)
 - New development accessibility by public transport (AMR)
 - Travel to work modes and flows
 - Car ownership
 - Public transport punctuality and efficiency
- Avoid and reduce air pollution? (4.3)
 - AQMA designations
 - NO2 emissions
 - PM10 emissions
- Protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)
 - New development in the Green Belt (AMR)
 - Amount of urban open land (AMR)
 - Open space with a Green Flag Award
 - Change in landscape character*
- Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings? (4.5)
 - Changes to the historic built environment (AMR)
 - Heritage assets 'at risk
 - Loss of or damage to designated heritage assets
- Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)
 - Condition of SSSIs (AMR)*
 - Amount of urban open land (AMR)
 - Open space with a Green Flag Award (AMR)
 - Achievement of local biodiversity targets
- Reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)
 - Water use per household*
 - Water pollution incidents recorded by Environment Agency*
- Avoid water pollution? (4.8)
 - Percentage of water bodies at good ecological status or potential*
 - Percentage of water bodies assessed at good or high biological status*
 - Percentage of water bodies assessed at good chemical status*
- Minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)
 - Non-recyclable waste generation per capita*
 - Recycling rates per capita*
 - Re-use of construction and demolition waste*
- Promote the conservation and sustainable use of productive agricultural land and maximise use of previously developed land? (4.10)
 - Dwelling completions on brownfield sites (AMR)
 - Dwelling completions on greenfield sites (AMR)
 - Employment completions on brownfield sites
 - Employment completions on greenfield sites
- Provide the right amount, type and tenure of housing to meet identified local needs? (5.1)
 - New dwellings and progress against housing target (AMR)
 - New specialist needs housing (AMR)
 - HMO monitoring (AMR)

- New dwelling density (AMR)
- Future housing trajectory and five year housing land supply(AMR)
- House prices (AMR)
- Housing affordability (AMR)
- New affordable housing completions (AMR)
- New Gypsy and Traveller sites (AMR)
- Unauthorised Gypsy and Traveller sites (AMR)
- Ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy? (6.1)
 - Changes in employment floorspace (AMR)
 - New employment floorspace on PDL (AMR)
 - Loss of employment land to non-employment uses (AMR)
 - Employment land availability (AMR)
 - Number of enterprises (AMR)
 - Jobs and job density (AMR)
 - Average earnings (AMR)
 - Unemployment levels (AMR)
- Encourage economic investment in those areas most in need of regeneration, in a way that will benefit those most in need of rewarding employment? (6.2)
 - Unemployment rates in deprived wards*
 - Performance of deprived wards against index of multiple deprivation indicators*
- Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)
 - Changes in retail floorspace (AMR)
 - Proportion of vacant retail floorspace (AMR)
 - Evening economy premises (AMR)
 - Changes in leisure floorspace (AMR)
 - Changes in community facility floorspace (AMR)
- Sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)
 - Changes in retail floorspace (AMR)
 - Proportion of vacant retail floorspace (AMR)
 - Changes in employment floorspace (AMR)
- Avoid the sterilisation of mineral resources? (6.5)
 - Number of minerals sites safeguarded for extraction.
- Provide access to training, skills development and lifelong learning to meet identified needs? (6.6)
 - Section 106 funds collected and held (AMR)
 - Educational attainment and skills (AMR)

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