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Please ask for:
Gurdip Paddan

* Reporting to Cabinet

29 August 2018

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 6 September 2018 at 7.30 pm in the Council Chamber, Council Offices, The Campus, Welwyn Garden City, Herts, AL8 6AE.

Yours faithfully



Corporate Director
Public Protection, Planning and Governance

AGENDA
PART 1

1. SUBSTITUTIONS

To note any substitution of Committee Members in accordance with Council Procedure Rules 19 – 22.

2. APOLOGIES

3. MINUTES

To confirm as a correct record the Minutes of the meeting held on 9 August 2018 (previously circulated).

4. NOTIFICATION OR URGENT BUSINESS TO BE CONSIDERED UNDER ITEM 10

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.

6. PUBLIC QUESTION TIME AND PETITIONS

Up to fifteen minutes will be made available for questions from members of the public on issues relating to the work of the Committee and to receive any petitions.

7. REVISED NATIONAL PLANNING POLICY FRAMEWORK (NPPF) JULY 2018 (Pages 5 - 16)

Report of the Corporate Director (Public Protection, Planning and Governance) on the National Planning Policy Framework (NPPF) which was published on 24 July 2018. It sets out the Government's planning policies for England and how these are expected to be applied.

8. GREEN BELT STUDY STAGE 3 AND NEXT STEPS (Pages 17 - 26)

Report of Corporate Director (Public Protection, Planning and Governance), which considers the findings of that Green Belt Study and the implications for the Local Plan. It considers the next steps and different approaches the Local Plan could take in identifying sufficient land to meet the Objectively Assessed Need for Housing.

9. FIVE YEAR LAND SUPPLY (Pages 27 - 38)

Report of the Corporate Director (Public Protection, Planning and Governance), which provides an interim update to the five year land supply (5YLS) which, although the Council is not required to publish, is supportive to the ongoing local plan examination, as well as being beneficial in assisting with planning application decisions and appeals. The five year land supply position is presented as of 31/05/2018.

10. SUCH OTHER BUSINESS AS, IN THE OPINION OF THE CHAIRMAN, IS OF SUFFICIENT URGENCY TO WARRANT IMMEDIATE CONSIDERATION

11. EXCLUSION OF THE PRESS AND PUBLIC

The Panel is asked to resolve:

That under Section 100(A)(2) and (4) of the Local Government Act 1972, the press and public be now excluded from the meeting for item 12 (if any) on the grounds that it involves the likely disclosure of confidential or exempt information as defined in Section 100A(3) and Part 1 of Schedule 12A of the said Act (as amended).

In resolving to exclude the public in respect of the exempt information, it is considered that the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

PART II

12. ANY OTHER BUSINESS OF A CONFIDENTIAL OR EXEMPT NATURE AT THE DISCRETION OF THE CHAIRMAN

Circulation: Councillors S.Boulton (Chairman) G.Hayes
M.Perkins (Vice-Chairman) S.Kasumu
A.Chesterman A Rohale
J.Cragg P.Shah
C.Gillett P.Zukowskyj
S.Glick

Co-opted Members:-
Tenants' Panel Representatives

D.Fuller and R.Read

Corporate Management Team
Press and Public (except Part II Items)

If you require any further information about this Agenda please contact Gurdip Paddan, Governance Services on 01707 357349 or email – democracy@welhat.gov.uk

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Part I
Main author: Bryce Tudball
Executive Member: Cllr M Perkins
All wards

WELWYN HATFIELD BOROUGH COUNCIL
CABINET PLANNING AND PARKING PANEL – 6 SEPTEMBER 2018
REPORT OF THE CORPORATE DIRECTOR (PUBLIC PROTECTION, PLANNING
AND GOVERNANCE)

REVISED NATIONAL PLANNING POLICY FRAMEWORK (NPPF) JULY 2018

1 Executive Summary

- 1.1 The revised National Planning Policy Framework (NPPF) was published on 24 July 2018. It sets out the Government's planning policies for England and how these are expected to be applied.
- 1.2 The revised NPPF can be viewed here:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 1.3 The revised NPPF replaces the previous National Planning Policy Framework published in March 2012.
- 1.4 Alongside the publication of the revised NPPF, the Government updated Planning Practice Guidance on viability, the standard methodology for calculating housing need and published a Housing Delivery Test measurement rule book.
- 1.5 The fundamental planning principles contained in the original NPPF are unchanged. The purpose of the planning system continues to be to contribute to sustainable development (of which there are three dimensions: economic, social and environmental). The revised NPPF retains a presumption in favour of sustainable development and reaffirms that the planning system should be planned.
- 1.6 The revisions to the NPPF focus it more strongly on the delivery of homes to meet need and put greater responsibility and accountability on Councils for the delivery of housing. It should also be noted that the revised NPPF goes much further than the previous NPPF in terms of promoting high quality design of new housing and places.
- 1.7 This report outlines the key revisions to the NPPF and identifies any potentially significant implications for the Council as local planning authority.

2 Recommendations

- 2.1 That the Panel notes the revised NPPF and the identified implications of the revisions for plan-making and planning decisions.

3 Background

- 3.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.
- 3.2 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 3.3 The first NPPF was published in March 2012. In 2017 the Government indicated its intention to update the NPPF. A Draft Revised NPPF was subsequently issued in March 2018 for public consultation. This was accompanied by Draft Planning Practice Guidance for Viability and a Draft Housing Delivery Test Measurement Rule Book.
- 3.4 A report was presented to the Panel on 12 April 2018 detailing the proposed changes to the NPPF, their potential implications, and setting out the Council's proposed response to the consultation. The Panel commented on the proposed responses and authorised the Head of Planning to prepare and submit a final response in consultation with the Executive Member for Planning. A consultation response was formally submitted to the Government in advance of the 10 May 2018 deadline.
- 3.5 The revised National Planning Policy Framework (NPPF) was published by on 24 July 2018. It can be viewed here:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 3.6 Alongside the publication of the revised NPPF, the Government updated Planning Practice Guidance on viability and published a Housing Delivery Test measurement rule book.
- 3.7 The revised NPPF replaces the previous NPPF published in March 2012.

4 Explanation

The revised NPPF updates the Government's planning policies for England and how these should be applied.

Format and structure of document

- 4.1 The document itself is divided into themed chapters in the same way as the previous NPPF. Chapters on plan-making and decision taking have been moved to the front of the document and the chapter relating to the delivery of homes has been moved closer to the front of the document (probably to reflect its elevated importance to the Government) but otherwise the order of the chapters remains broadly consistent.

- 4.2 The individual chapters have been reorganised in a number of cases such that they now read in a much more logical and helpful way. Overall the revised NPPF is substantially more user friendly than the previous NPPF.
- 4.3 A new chapter has been introduced entitled “Making the best use of land”.

Overall thrust of document

- 4.4 The revised NPPF is based on the same fundamental planning principles and the previous NPPF.
- 4.5 Paragraph 7 of the revised NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. This is the same purpose as set out in the previous NPPF.
- 4.6 In the same way as the previous NPPF, the revised NPPF identifies three overarching dimensions to achieving sustainable development: economic, social and environmental.
- 4.7 The revised NPPF retains a presumption in favour of sustainable development.
- 4.8 The revised NPPF focuses more strongly on the delivery of homes to meet need and puts greater responsibility and accountability on Councils for the delivery of housing. It is notable that it goes much further than the previous NPPF in terms of promoting high quality design of new housing and places.

Implementation

- 4.9 Key details in relation to the implementation of the revised NPPF are set out in Annex 1 of the document. The NPPF's policies came into effect on the day of its publication (i.e. 24 July 2018). They have already become material considerations which should be taken account in dealing with planning applications. With respect to plan-making, the revised NPPF sets out transitional arrangements for the implementation of its policies. Paragraph 214 provides that plans submitted on or before 24 January 2019 will be examined against the previous NPPF. The Council submitted its Draft Local Plan for examination in May 2017 and its examination is ongoing. In accordance with the revised NPPF, the plan's examination will continue to be against the policies in the previous NPPF. Further detail on this is provided in the following part of this report. It is important to note that should the plan be withdrawn or otherwise does not proceed to become part of the development plan, the policies in the revised NPPF will apply to any subsequent plan produced for the area concerned.
- 4.10 Officers are currently reviewing the extent to which the submitted Local Plan is consistent with the revised NPPF. While it is not necessary to update the plan for the purposes of the Local Plan examination, there are clear benefits to ensuring that the plan is as up to date as possible. The extent to which it is not fully consistent with the revised NPPF would need to be taken account of by officers and members in determining planning applications. The Council is able to propose modifications to the Local Plan as part of the examination process where these are necessary to make the Plan sound or to improve the clarity of the Plan.

Plans

- 4.11 Paragraph 17 sets out that development plans must include strategic policies to address each local authority's priorities for the development and use of land. However it provides that these strategic policies can be produced in different ways, depending on the issues and opportunities facing an area. They can be contained in joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies), or combined authorities producing a spatial development strategy.
- 4.12 What this means is that in future the Council has the option to prepare its own plan or work with other authorities to produce a joint strategic plan which covers a wider area. In this regard, the Government has recently awarded £250,000 to North Herts, East Herts, Stevenage and Welwyn Hatfield councils to progress joint planning work for long-term development needs.
- 4.13 Non-strategic plans can be brought forward by local planning authorities or neighbourhood planning authorities.

Presumption in favour of sustainable development

- 4.14 The revised NPPF reiterates the previous NPPF in terms of a presumption in favour of sustainable development. The definition of the presumption is updated in the revised NPPF.
- 4.15 The previous NPPF required local plans to meet objectively assessed need subject to certain caveats. Paragraph 11 of the revised NPPF sets out that strategic policies should as a minimum provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within other areas (as established through statements of common ground) subject to similar caveats. This amendment puts a greater emphasis on the Council to meet its minimum needs and also on working with neighbouring Councils who might not be able to meet their own needs. Linked to this, other Councils would be required to meet any need that cannot be met by Welwyn Hatfield having regard to the application of the identified caveats.
- 4.16 The revised NPPF updates what are deemed to be out of date policies for applications involving the provision of housing. Footnote 7 to paragraph 11 of the revised NPPF sets out that out of date policies include, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. The Housing Delivery Test is a new measure introduced in the revised NPPF which could have a significant bearing on the Council's decision-taking. This is addressed in more detail in a later section of the report. If the policies in the Council's Local Plan should be deemed to be out-of-date there will be a much greater expectation on the Council to approve proposals unless the adverse impacts would significantly and demonstrably outweigh the benefits.

Tests of soundness

- 4.17 The tests of soundness relating to the examination of plans are slightly amended in the revised NPPF.
- 4.18 In the previous NPPF to be positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and

infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- 4.19 In the revised NPPF to be positively prepared plans should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- 4.20 In the previous NPPF, to be justified a plan was required to be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. In the revised NPPF, a plan is required only be an appropriate strategy.
- 4.21 In the previous NPPF, to be effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. The revised NPPF, strengthens the test such that cross-boundary strategic matters must have been dealt with rather than deferred, as evidenced by the statement of common ground.

Duty to co-operate

- 4.22 Local authorities already have a legal duty to cooperate on strategic matters that cross administrative boundaries. The NPPF now provides further clarity about the duty and how it will be expected to be discharged in the production of plans. A much greater emphasis is placed on statements of common ground as a way of evidencing cross-boundary working.
- 4.23 Paragraph 27 of the revised NPPF advises that to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be made publicly available throughout the plan-making process to provide transparency. The soundness test for whether a plan is effective has been updated in line with this to require statements of common ground as evidence that effective joint working on cross-boundary strategic matters has taken place and been dealt with rather than deferred. The presumption in favour of sustainable development in the NPPF now requires that for the purposes of plan-making that unmet development need are addressed through statements of common ground. Paragraph 137 of the revised NPPF sets out that in determining whether exceptional circumstances exist to justify changes to Green Belt boundaries a local planning authority must have discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through statements of common ground.
- 4.24 In taking forward future plans the Council will have to co-operate to a greater extent with neighbouring councils and there will be a need to produce statements of common ground to evidence this. The more common approach to date has been to prepare a memorandum of understanding to evidence to an examination inspector and others what has been agreed at the end of the duty to co-operate process.

Standard methodology for Assessing Local Housing Need

- 4.25 As part of the Government's Planning for the Right Homes in the Right Places consultation in autumn 2017 it indicated that it intended to introduce a new standardised method of calculating housing need. The revised NPPF confirms this requirement. It confirms that plans should be based on a local housing need assessment conducted using the standard method in national planning guidance, unless there are exceptional circumstances to justify an alternative approach. The method takes the Government's household growth projections and applies an affordability ratio, comparing local house prices with workplace earnings, to produce a need figure. The Government hopes the method will end protracted wranglings on the issue during local plan examinations. However, the Ministry for Housing, Communities and Local Government, in its consultation response, said it will consider adjusting the methodology in order to meet its 300,000-homes-a-year target in light of the impending publication of new household growth projections that are likely to be lower than previous estimates. It will consult on the specific details when the new projection figures are published in September.
- 4.26 The Government's standard methodology for assessing local housing need currently amounts to a need of 867 homes per year in Welwyn Hatfield. This compares to the objectively assessed need of 800 per year identified in the Council's Strategic Housing Market Assessment Update 2017 prepared by consultants Turleys.
- 4.27 As set out in paragraph 4.9 there are transitional arrangements in place for the implementation of the revised NPPF. The Council's Draft Local Plan has already been submitted for examination. The examination is currently in progress and in line with the revised NPPF the plan will continue to be assessed against the previous NPPF. This means that the figure of 800 homes per year will be the basis on which the plan is examined. It should be noted that the Draft Local Plan contains a housing target of circa 12,000 dwellings to 2032. This is a significant shortfall compared with the objectively assessed need of 800 homes a year which equates to 15,200 homes to 2032 and 16,000 to 2033 (the Inspector has indicated that the plan should be rolled forward one year further which would mean accounting for another year of need).
- 4.28 If the Council's plan is withdrawn from examination or otherwise does not proceed to become part of the development plan, the policies in the revised NPPF will apply to any subsequent plan produced for the area concerned. This means that unless exceptional circumstances justify an alternative approach the new plan would need to be based on the Government's standard methodology for assessing local housing need which currently amounts to a need of 867 homes per year in Welwyn Hatfield. This figure may be subject to change however, following the publication of 2016-based household projections later in 2018.

Housing Delivery Test

- 4.29 The revised NPPF introduces a Housing Delivery Test for local authorities. The test will measure the number of homes created against local housing need and penalise councils that under-deliver against various thresholds over a three-year period.
- 4.30 Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years,

the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

- 4.31 From 2020 the Housing Delivery Test has significant implications where delivery is below 75 per cent of the housing requirement. In accordance with paragraph 11 of the revised NPPF, policies in the development plan relating to the provision of housing will be considered out of date and the presumption in favour of sustainable development will apply. However, this year, the presumption penalty threshold is less than 25 per cent, rising to less than 45 per cent next year. MHCLG will publish annually the results of the Housing Delivery Test, starting in November 2018.
- 4.32 Alongside the revised NPPF, the Council has published a Housing Delivery Test measurement rule book. This can be viewed here: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>. The rule book sets out in detail how the tests will be applied. The figure to be used for the number of homes required depends on how old the latest adopted housing requirement is. If this is more than five years old then the figure for the borough will be the minimum annual local need figures as identified through the Government's standard methodology (currently 867 homes per annum for Welwyn Hatfield). If the latest adopted housing requirement is less than five years old then the figure used will be the lower of the latest adopted housing requirement or the minimum annual local housing need figure.
- 4.33 In identifying the correct housing requirement figure for the calculation, for the financial years 2015-16, 2016-17 and 2017-18, the minimum annual local housing need figure is replaced by household projections in all aspects of the Housing Delivery Test.
- 4.34 If the number of homes which are built are significantly below the identified number that need to be delivered (below 75%) then the Council will have failed the test and its policies will therefore be rendered out-of-date. A presumption in favour of sustainable development would then need to be applied to decision-taking. This puts a much greater expectation on the Council to approve proposals unless the adverse impacts would significantly and demonstrably outweigh the benefits.
- 4.35 It is likely that the housing target ultimately selected through the current Local Plan examination process will be challenging. It is therefore likely that delivery of that housing target over the plan period will also be challenging. The delivery of permitted homes is essentially outside the Council's control and there are very few tools available to the Council to incentivise landowners/developers to build homes once permission has been granted.

Planning conditions

- 4.36 Paragraph 76 of the revised NPPF suggests that to help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period (usually three years). Whilst this is option welcomed, there are very few other levers in the revised NPPF that can be used to incentivise landowners/developers to build homes once permission has been granted. This

represents a considerable problem as significant under-delivery (below 75%) would render the Council's policies as out-of-date and mean the presumption in favour of sustainable development would need to be applied to decision-taking.

Green Belt release

- 4.37 For the first time the Government has provided a set of criteria which must be met in order to justify and evidence that exceptional circumstances exist to allow Green Belt boundaries to be altered. As part of the justification, paragraph 137 requires that the strategic policy-making authority assess all other reasonable options for meeting those identified needs as well as demonstrating whether the strategy makes as much use as possible of suitable brownfield sites and underutilised land; optimises the density of development; and is informed by a Statement of Common Ground with neighbouring authorities as to whether they could accommodate some of the identified need for development.

Affordable housing

- 4.38 The revised NPPF contains an expanded definition of affordable housing. The definition – set out within the glossary of the document – has been broadened to include affordable housing for rent (encompassing both social rent and affordable rent), starter homes (as defined under Sections 2 and 3 of the Housing and Planning Act 2016), discounted market sales of at least 20% below market value and other shared equity or 20% below market value schemes.
- 4.39 The revised NPPF sets out an expectation at paragraph 64 that at least 10% of homes on major housing sites should be available for affordable home ownership with exemptions for Build to Rent, purpose built elderly or student accommodation, self-build or wholly affordable proposals. A major development site is defined by the Government as a housing development of 10 or more dwellings or a site area of more than 0.5 hectares. By way of comparison the submitted Local Plan expects that sites of 11+ homes can viably deliver 25% affordable homes in Hatfield, 30% in Welwyn Garden City and 35% in villages and rural locations.

Small and medium sized sites

- 4.40 Paragraph 68 of the revised NPPF contains a requirement that local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This is a new requirement that was not present in the previous NPPF, however it is less strenuous than the 20% target set out in the Draft Revised NPPF in March 2018. It is likely that this requirement has been added to assist small house building companies to play a greater role in delivery.

Viability

- 4.41 The revised NPPF contains updated guidance on viability matters. In addition, new Planning Practice Guidance relating to viability has been published. They both provide that all viability assessments should be made publicly available.

Housing for rent and other specialist housing

- 4.42 There is a greater focus in the revised NPPF on housing for rent and other specialist housing. New wording is included requiring that the needs of students,

travellers and people who rent their homes are considered as part of the overall assessment of housing need and that their needs are subsequently reflected in planning policies. The revised NPPF provides support for Build to Rent housing and specialist accommodation schemes by exempting them from the 10% minimum affordable housing requirement.

Good design

- 4.43 The revised NPPF goes significantly further than the previous NPPF in terms of promoting high quality design. It states upfront in Chapter 12 Achieving well designed places that the creation of high-quality buildings and places is 'fundamental' to what the planning and development process should achieve. It sets out a new requirement that councils should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme. This is welcomed.

Effective use of land

- 4.44 A new chapter relating to the effective use of land has been included in the revised NPPF. This combines guidance found in various parts of the previous NPPF with new guidance about the Government's expectations for using land. Paragraph 117 is clear that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 4.45 Paragraph 118 gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, promotes the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively and supports opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, the revised NPPF state that policies and decisions should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed, and can maintain safe access and egress for occupiers.
- 4.46 The revised NPPF states that local planning authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. It specifically encourages Councils to use their compulsory purchase powers to boost delivery. The Council is already taking a proactive role in meeting development needs in the borough, for example as part of its programme to regenerate Hatfield Town Centre and Highview.
- 4.47 Paragraphs 120 and 121 emphasise that policies and decisions need to reflect changes in the demand for land and that local planning authorities should take a flexible approach to allowing alternative uses to come forward where there is no reasonable prospect of the preferred use and where this would help to meet identified development needs. In particular it advises that they should: use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in the framework; and make more effective use of sites that provide community services such as

schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.

- 4.48 The revised NPPF is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible including the use of minimum density standards for town centres and other locations that are well served by public transport. It advises that these standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. It include new explicit advice that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the framework The Submitted Local Plan already contains density guidance and supports higher densities in sustainable locations.

Town centre uses

The NPPF continues to support the role of the town centre and maintains the requirement to identify a network and hierarchy of centres. Primary shopping areas and the extent of town centres still need to be defined but the need to identify primary and secondary frontages has been removed from the revised NPPF. Sites should be identified to meet the scale and type of development needed looking at least ten years ahead.

Plan Review

- 4.49 Paragraph 33 of revised NPPF set out a new requirement that plans should be reviewed at least every five years. It is clear that strategic policies within plans will need updating where local housing need figures have or look set to change significantly. This has been accompanied by a change to the Regulations making it a legislative requirement.

PPA

- 4.50 The revised NPPF reiterates that that applicants and local planning authorities should consider the potential for voluntary Planning performance agreements (PPAs) where this might achieve a faster and more effective application process. New guidance sets out that PPAs are likely to be needed for applications that are particularly large or complex to determine. The Council already seeks to negotiate PPAs in respect of large or complex applications.

Agent of change principle

- 4.51 The revised NPPF reiterates that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. To help ensure this, it introduces a new 'agent of change' principle. In a move designed to protect existing businesses from complaints from residents of newly-built schemes, paragraph 182 of the framework states that where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be

required to provide suitable mitigation before the development has been completed. This is broadly welcomed, however it is unlikely to address problems which arise from permitted development, such as changes of use from office to residential, as this does not require planning permission.

Flooding

- 4.52 Paragraph 156 of the revised NPPF contains an additional requirement that in managing flood risk strategic policies should consider cumulative impacts in, or affecting, local areas susceptible to flooding.

Aviation

- 4.53 In respect of aviation, Paragraph 104 gives additional guidance that planning policies should recognise the importance of maintaining a national network of general aviation facilities, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.

5 Legal Implications

- 5.1 There are no direct legal implications associated with this report. The NPPF sets out the Government's planning policies and how they should be applied. It must be taken into account when preparing the development plan and is a material consideration in planning decisions.

6 Financial Implications

- 6.1 There are no direct financial implications associated with this report. It should be noted however that the NPPF introduces additional responsibilities for Councils in relation to the preparation and review of plans which could have implications for the Local Plan budget.
- 6.2 The Government has previously consulted on the possibility of restricting New Homes Bonus where councils do not achieve their housing need. No announcement has been made in the revised NPPF or elsewhere in relation to whether or not this proposal will be taken forward.

7 Risk Management Implications

- 7.1 As the Draft Local Plan is currently subject to examination, in line with the transitional arrangement in the revised NPPF, it will continue to be examined against the previous version of the NPPF. This mitigates a number of key risks, however should the plan be withdrawn or otherwise does not proceed to become part of the development plan, the policies in the revised NPPF will apply to any subsequent plan produced for the area concerned.
- 7.2 The greatest risk in respect of the revised NPPF surrounds the introduction of a Housing Delivery Test. If the number of homes which are built are significantly below the identified number that need to be delivered (below 75%) then the Council will have failed the test and its policies will therefore be rendered as out-of-date. A presumption in favour of sustainable development would then need to be applied to decision-taking. This would take an element of control away from the Council when determining planning applications. It is likely that the housing target that is ultimately selected through the current Local Plan examination

process will be challenging. It is therefore likely that delivery of that housing target over the plan period will also be challenging. The delivery of permitted homes is essentially outside the Council's control and there are very few tools available to the Council to incentivise landowners/developers to build homes once permission has been granted.

8 Security and Terrorism Implications

8.1 There are no security or terrorism implications associated with this report.

9 Procurement Implications

9.1 There are no procurement implications associated with this report.

10 Climate Change Implications

10.1 There are no climate change implications associated with this report.

10.2 The revised NPPF contains policies relating to climate change that will need to be considered by the Council in the preparation of planning and other documents and the determination of planning applications.

11 Link to Corporate Priorities

11.1 The subject of this report is linked to the Council's Business Plan 2018-2021 and particularly Priority 1 Our Community, Priority 2 Our Environment, Priority 3 Our Housing and Priority 4 Our Economy.

12 Equalities and Diversity

12.1 An EqIA was not completed because this report does not propose changes to any existing service-related policies or the development of any new service-related policies.

Name of author	Bryce Tudball
Title	Principal Planner
Date	August 2018

Part I
Item No: 0
Main author: Sue Tiley
Executive Member: Cllr Mandy Perkins
All Wards

WELWYN HATFIELD BOROUGH COUNCIL
CABINET PLANNING AND PARKING PANEL – 6 SEPTEMBER 2018
REPORT OF THE CORPORATE DIRECTOR (PUBLIC PROTECTION, PLANNING AND GOVERNANCE)

GREEN BELT STUDY STAGE 3 AND NEXT STEPS

1. Executive Summary

- 1.1 The Welwyn Hatfield Local Plan has been submitted and is currently undergoing public examination by an independent inspector. The inspector has indicated that the plan is not currently 'sound' as it does not meet the objectively assessed need for housing. The submitted plan contained sites for 12,000 homes but the housing need is acknowledged to be about 16,000 homes to 2033. The inspector has therefore asked the Council to carry out a further Green Belt Study to seek to identify additional sites for housing.
- 1.2 This report considers the findings of that Green Belt Study and the implications for the Local Plan. It considers the next steps and different approaches the Local Plan could take in identifying sufficient land to meet the Objectively Assessed Need for Housing.
- 1.3 The Green Belt Study and its accompanying appendices has been published on the examination pages of the Council's website (reference EX88)
<http://www.welhat.gov.uk/article/6938/Examination-Documents>
- 1.4 Section 7 of this report identifies a number of risks associated with different development strategies and the risk of the inspector finding the plan unsound, defaulting to the NPPF standard methodology for calculating local housing need and/or the Council having its plan-making powers removed.

2. Recommendations

- 2.1 That the Panel comments on the conclusion of the Green Belt Study.
- 2.2 That the Panel comments on the two development scenarios set out in Paragraph 4.28. Scenario One is the loss of some employment land and the release of some land from the Green Belt. Scenario Two is the retention of proposed employment land designations and the release of more land from the Green Belt than the option above.
- 2.3 That the Panel comments on the merits and risks of the three approaches set out in Paragraphs 4.32-4.43 and seeks to identify a preferred approach. Approach One is to carry out a call-for-new-sites exercise and consult on new site modifications prior to the village hearing sessions. Approach Two is a development strategy based on allocated sites and sites that have already been promoted to the Council in the first

ten years of the plan period and to identify 'Broad Locations' or 'Areas of Search' for the remaining five years. Approach Three is a development strategy based on allocated sites, extra capacity on some existing allocations and the selection of sites that have already been promoted to the Council and analysed by officers.

- 2.4 That the Panel agrees that the Head of Planning in consultation with the Leader of the Council will write to the Inspector setting out the Council's views on the three approaches and the implications for the examination programme.

3. Background

What is the Green Belt?

- 3.1 The Green Belt is a policy designation; the main aim of which is to prevent urban sprawl by keeping land permanently open. The main characteristics of Green Belts are their openness and their permanence. It is immaterial whether or not land in the Green Belt is attractive or of ecological value. It can include both previously developed land and open countryside.
- 3.2 The National Planning Policy Framework (NPPF 2018) sets out the five purposes of the Green Belt as:
- to check the unrestricted sprawl of large built up areas;
 - to prevent neighbouring towns from merging;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns: and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.3 National policy strictly controls the type of development that can take place in the green belt without having to justify 'very special circumstances'. It asserts that the boundaries of the Green Belt can only be altered in 'exceptional circumstances' but where they are altered regard should be had to their intended permanence and that they should last beyond the plan period.
- 3.4 Whilst the new NPPF (July 2018) now includes a set of steps that councils should go through before releasing land from the Green Belt, in order to demonstrate that exceptional circumstances exist, these do not apply to submitted plans, which is the case for Welwyn Hatfield. Instead the release of individual sites or groups of sites will be considered against what is known as the 'Calverton Test'. This relates to the case of Calverton Parish Council Vs Nottingham City Council in which the judgement considered the matter of exceptional circumstances. The implications of this case were reported to Cabinet Housing and Planning Panel in July 2016.
- 3.5 The judgement concluded that decision makers when considering whether or not exceptional circumstances exist must have regard to the following:
- The acuteness of the Objectively Assessed Need,

- The constraints on supply and availability of land for sustainable development,
- The consequent difficulties in achieving sustainable development without imposing on the Green Belt,
- The nature and extent of the harm to the Green Belt if boundaries are reviewed; and
- The extent to which the consequent impacts on the purposes of the Green Belt maybe ameliorated or reduced to the lowest reasonable extent.

Inspector's thoughts on the Green Belt

- 3.6 Our Inspector has already stated that the acuteness of the need for housing in the borough is sufficient to justify exceptional circumstances to release land from the Green Belt, but it should be noted that this will still need to be demonstrated for each site or group of sites. This means that the benefits of meeting the housing need and other sustainability considerations will need to be balanced against the harm to the Green Belt.
- 3.7 Currently 79% of the borough lies within the Green Belt, with no land beyond the Green Belt. As a consequence the larger villages and towns are 'inset' within it whilst the smaller villages lie within the Green Belt and are known as 'washed-over' villages. In order to protect its permanence the 1993 Welwyn Hatfield District Plan identified areas of safeguarded land at Hatfield Aerodrome (now developed) and at Panshanger Aerodrome.
- 3.8 The NPPF makes it clear (paragraph 140) that only where the open character of a village makes an important contribution to the openness of the Green Belt should the village be included in the Green Belt.
- 3.9 In preparing and submitting the Local Plan, this Council considered that whilst there were exceptional circumstance to release land from the Green Belt, the full housing need could not be met because of infrastructure concerns and impact on the Green Belt. During the course of the examination, the Inspector has considered that the infrastructure constraints could be overcome and that further evidence is required in terms of the harm to the Green Belt and to consider what is essential to retain. He has therefore indicated that the plan is unsound in its current form but is capable of being made sound if additional sites are identified.
- 3.10 At the end of the Stage 2 Examination Hearing Sessions in October 2017 the Inspector clarified that the further work should:
- Consider what parts of the Green Belt it is essential to retain. The study should provide a comprehensive assessment of land around the towns and villages
 - Consider if the 'washed-over' villages should be inset (i.e. released from the Green Belt)
 - Consider opportunities further afield for a new settlement if there are insufficient opportunities to meet the housing need through other options

- Further demographic work on unattributable population change, student housing and migration between East Herts and Welwyn Hatfield
- An analysis of housing land supply in the defined Housing Market Area
- An analysis of the necessary supporting infrastructure associated with 16,000 dwellings

3.11 At the end of the Stage 4 Examination Hearing Sessions in June 2018 the Inspector additionally asked the Council to come forward with a set of modifications for additional sites and a work programme to establish when the Hearing Sessions on the villages and new sites could take place.

4. Explanation

4.1 The Council commissioned Land Use Consultants (LUC) to carry out an independent Green Belt Study as requested by the Examination Inspector.

4.2 The Green Belt Study builds on two previous green belt studies, by providing more comprehensive coverage of the land around the inset towns and villages. It also considers the harm to the Green Belt of releasing land and identifies which parts of the Green Belt are most essential to retain. It carries out a detailed assessment of parcels of land around the towns and larger villages, considers whether or not any of the washed-over villages should be released from the Green Belt and the potential harm to the Green Belt from new settlement locations.

4.3 The main report comprises 74 pages and is structured as follows:

- **Chapter 1** introduces the report
- **Chapter 2** summarises the policy context
- **Chapter 3** describes the assessment methodology
- **Chapter 4** provides a strategic assessment of the role of Green Belt in the borough
- **Chapter 5** sets out the findings of the assessment of washed over settlements
- **Chapter 6** summarises the assessment of the contribution land makes to the Green Belt purposes (as defined in the NPPF)
- **Chapter 7** summarises the findings of the assessment of harm of releasing Green Belt land
- **Chapter 8** addresses the key Green Belt issues in relation to the development of new settlement locations
- **Chapter 9** considers which areas constitute the ‘most essential’ Green Belt within the Borough
- **Chapter 10** provides conclusions and sets out recommendations and next steps

4.4 The report is accompanied by four appendices which contain the following:

- **Appendix 1.1:** Inspector’s comments on Green Belt issues as raised at the end of the Stage 2 Hearings of the Local Plan Examination

- **Appendix 5.1:** Assessment of Washed over Settlements
- **Appendix 5.2** Development Scenarios for Washed over Settlements
- **Appendix 6.1:** Detailed Assessment Findings of Green Belt Contribution and Harm

Conclusions on washed-over villages

- 4.5 The assessment considered the levels of openness of the sixteen washed-over villages in the borough, two of which straddle the boundary with adjoining authorities. This involved consideration of the amount, form and character of development and open spaces within the settlement and its relationship with the surrounding Green Belt.
- 4.6 Nine villages have been recommended for retention as a washed-over village, either because of the important contribution their levels of openness make to the Green Belt or because they straddle the boundary with an adjoining boundary and any release would need to be brought forward jointly through a future plan.
- 4.7 The remaining seven villages were subject to further assessment to consider different development scenarios including parcels around the core built up area. The detail of the assessments is set out in the Appendices whilst the summary of the findings is set out in Table 5.1 of the main report.
- 4.8 The consultants consider that the following settlements have the potential for inseting with varying degrees of harm to the Green Belt if the core built up area were to be released: Lemsford, Stanborough, Essendon, Newgate Street, Northaw, Bell Bar and Swanley Bar.
- 4.9 In terms of harm to the Green Belt there is some limited scope for development in and around these villages. The greatest potential lies within Stanborough and Bell Bar. The remaining settlements offer lesser scope because of the impact on the Green Belt in association with other constraints such as the historic environment.

Parcel Assessment

- 4.10 The consultants divided land around towns, inset villages and washed-over villages with potential for inseting into 95 parcels, defined by sensible boundaries such as roads and field edges, and then carried out a detailed assessment of each of them. This comprised an assessment of the extent to which a parcel performs a Green Belt function. As with the previous two green belt studies, parcels were categorised against each of the five NPPF purposes and the local purpose as follows:

‘limited or no role’	‘partial role’	‘significant role’
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- 4.11 The results of this assessment are summarised in Table 6.1 of the study report and described in detail in Appendix 6.1.
- 4.12 A separate harm assessment was then carried out which considered the degree of harm that would result if the parcel, a site or sites within that parcel, or a combination of parcels, were to be released. These are described in the report as development scenarios.

4.13 Six categories of harm have been identified as follows:

very high	high	moderate-high	moderate	moderate-low	low
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- 4.14 The detailed results of the harm assessment are discussed in Appendix 6.1, where it considers each scenario and a combination of scenarios for each parcel.
- 4.15 Figure 7.1 illustrates on a map the results of the lowest levels of harm which result from the release of individual parcels or sub-parcels of land. However in order to ensure that the cumulative impact is taken into account of combinations of sites, it is important to read the map in conjunction with the more detailed assessments set out in Appendix 6.1. A summary of the harm assessment is set out in Table 7.1.
- 4.16 Much of the land in the 'low', 'moderate-to-low' and 'moderate' categories is either in uses that the Council would wish to retain or is already developed, and as a consequence there is insufficient land in these categories to meet the housing shortfall.
- 4.17 At first sight there would appear to be more land than needed in the 'moderate-to-high' category but not all of these areas have been promoted for development and therefore further work would need to take place to consider if there are sufficient sites which would be made available and are suitable for development.
- 4.18 The Inspector asked the Council to identify those areas which are essential to retain. The Green Belt Study concludes that it is the areas where there would be 'very high' harm which are considered to be most essential.
- 4.19 It should also be noted that some existing allocations in the submitted plan are in 'high' harm areas. Paragraph 138 of the NPPF sets out that sustainable patterns of development should be taken into account when deciding which land to release. Paragraph 7.8 of the Green Belt Study report makes it clear that just because a parcel would result in high harm does not mean it should not be released for development. Planning judgement will need to weigh up sustainability and environmental considerations as well as harm to the Green Belt. In each case exceptional circumstance have to be justified and the Council will need to consider whether the overall benefits outweigh the harm.
- 4.20 It should also be noted that some parcels no longer perform a Green Belt function and might be therefore appropriate for release, even if they are not to be allocated for development.

New Settlement

- 4.21 The study considers the harm that would result from the release of land for a new settlement. This required an assessment of the land beyond the more detailed parcel assessment which focuses on land adjoining the existing towns and villages.
- 4.22 A purposes assessment concluded that there was little differentiation between the majority of the purposes. The Study concludes that it is NPPF Purpose 2 which relates to the merging of towns which was the most significant indicator of where new settlements could potentially result in less harm to the Green Belt.

4.23 In essence the study concludes that large parts of the borough have equal scope for a new settlement.

Housing Land Supply

4.24 A review is currently underway of the different sources of housing land supply. Evidence to the examination and last year's Annual Monitoring Report set out that as a consequence of recent permissions and prior notifications housing land supply has increased from 12,000 set out in the Submission Local Plan to 12,400. This leaves a figure of 3,600 dwellings to find in order to build 16,000 homes by 2033.

4.25 As well as looking at opportunities to add in additional sites, officers are currently reviewing whether or not there are opportunities to increase capacity on sites currently already proposed for allocation in the Submitted Local Plan. Some sites have already come forward with planning applications for higher numbers whilst other sites now have permission for a reduced capacity. Initial estimates indicate that there may be potential to increase capacity in the region of 700 - 1,000 homes, although the infrastructure implications of this need to be tested.

4.26 The Inspector has indicated that he wishes to consider releasing some employment land to help meet the shortfall for housing. This would reduce the impact on the Green Belt but will result in the borough having insufficient land to meet the forecast need for employment land and potentially move from a position of having slightly more jobs than workers to one where there are not enough jobs for the anticipated growth in the economically active population. Furthermore there is insufficient land in employment use being promoted to meet the entire housing shortfall.

4.27 In order to reach 16,000 dwellings it will therefore be necessary to review opportunities within the Green Belt. A number of sites considered as part of the process for preparing the Local Plan, but not included in the Submitted Local Plan, have submitted further evidence to address the issues identified by the Council as a reason for not allocating them and since the Local Plan was submitted new sites have continued to be promoted.

Next steps

4.28 As set out in paragraph 3.8 above the Inspector has asked the Council to consider the infrastructure implications associated with a plan target for 16,000 dwellings.

4.29 In order to address this it will be necessary to test different development scenarios in order to understand the cumulative impact of different options. It is proposed that two scenarios be tested.

- Scenario One: extra capacity on some existing allocations, the loss of some employment land and the release of some land from the Green Belt
- Scenario Two: extra capacity on some existing allocations, the retention of employment land and the release of more land from the Green Belt than the option above

4.30 There will also be a need to update the evidence in the Housing and Employment Land Availability Assessment (HELAA), the Sustainability Appraisal and potentially the Strategic Flood Risk Assessment.

- 4.31 As part of the examination process where changes are required to a plan, there is what is known as 'modifications consultation'. This follows after the formal hearing sessions and allows the Inspector to consider representations on the proposed changes before he writes his report on the soundness of the plan. Any additional sites added into the Plan will therefore be subject to public consultation.

Approach One

- 4.32 The inspector has offered the Council the opportunity to consult on the introduction of new site into the plan, prior to the village hearing sessions. In order to select sites that result in the least harm to the Green Belt, officers anticipate that this would necessitate a new call-for-sites process, analysis of the newly promoted sites, further debate with members and public consultation. This is because some sites that have already been promoted and analysed but not included in the plan are in areas of high harm.
- 4.33 This would not remove the requirement to consult on all of the modifications to the plan after the hearing sessions however and would therefore probably delay the adoption of the plan by up to one year.
- 4.34 If the Council chose to consult on new site modifications at this stage it is anticipated that the next hearing sessions would take place in autumn 2019, based on a timetable of call-for-new-sites in autumn 2018, analysis by officers in winter 2018, debate with Members in spring 2019 and consultation in summer 2019.
- 4.35 This would also have an impact on housing delivery as the five year housing land supply is dependent on a number of Green Belt sites in the plan being released, gaining planning permission and coming forward for development. If these sites cannot come forward because the Plan remains at examination stage, it might lead to an increase in undesirable speculative planning applications, which might need to be approved or could be won at appeal, because the Council would have a record of poor housing deliverability under the Housing Delivery Test, which has been introduced in the new NPPF and comes into place in November 2018.

Approach Two

- 4.36 As a result an alternative approach would be to devise a development strategy based on allocating sites for the first ten years of the plan period following adoption, with the remaining five years of housing to come forward in areas identified as 'Broad Locations for Growth' or 'Areas of Search'. Both the 2012 and 2018 versions of the NPPF only require the identification of sites in years 11-15 **where possible**.
- 4.37 The first ten years of the plan could include sites that have already been promoted to the Council and been analysed by officers, but were rejected at an earlier stage in the preparation process. It is considered that these sites could be proposed to the Inspector without the need for further consultation as they are already in the public domain.
- 4.38 The timetable would be infrastructure testing and sustainability appraisal work to late 2018, debate with Members about which sites to allocate and Broad Locations or Areas of Search to select in early 2019, hearing sessions in spring 2019 and modifications consultation in summer 2019. This would result in minimum delay to the Local Plan timetable.

- 4.39 Specific sites within Broad Locations or Areas of Search would then be brought forward via a review of the plan, which would need to be completed within five years of the adoption of this plan. This approach would enable sites which have not previously been promoted or considered by Members as part of the Local Plan preparation process to date to be debated as part of the review process.
- 4.40 It is worth noting however that the Council could not rely on all of its already allocated sites in the first ten years however, as they cannot be entirely built out within that time period. Around 2,870 dwellings of the current housing target are identified for delivery within the last five years of the plan period.
- 4.41 The Inspector has previously indicated that he is not in favour of deferring the difficult decisions for a review of the Plan, but there has now been a change to the legislation which requires councils to have completed a review of their plan within five years of adoption. If this approach were selected then this plan would set the strategic direction for growth for the last five years.
- 4.42 The inspector has advised that it is a matter for the Council to consider how it wants to proceed. It is therefore recommended that the Council writes to the inspector, setting out its preferred approach and the timetable implications of both approaches. This will give the inspector the opportunity to advise the Council on the acceptability of its preferred approach if he has any concerns.

Approach Three

- 4.43 Officers consider that it may be possible to allocate sufficient sites to achieve close to 16,000 homes solely from existing allocations, extra capacity on some existing allocations and the selection of sites that have already been promoted to the Council and analysed by officers.
- 4.44 The negatives of this approach is that some of the sites that have already been promoted to the Council and analysed by officers are in high harm areas of the Green Belt and should therefore probably only be considered if the Council is willing to accept the loss of some of employment land, as per Scenario One in Paragraph 4.28. There are also uncertainties about the individual and cumulative deliverability of some of these sites that would need to be resolved.

5. Legal Implications

- 5.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 as amended do not cover the modifications process of a Local Plan examination. The Statement of Community Involvement does also not refer to consultation at this stage. There are therefore no regulatory requirements with regards to consultation at this stage. The Inspectorate's Procedural Practice in the Examination of Local Plans refers to Main Modifications consultation which should be for a minimum of six weeks, but the scope and length of the consultation should reflect that for the Regulation 19 consultation of the Local Plan. Consultation at this stage should only be on the Main Modifications. The Inspector's Practice Note does not refer to pre-modifications consultation and Counsel's advice is that there is no requirement to carry one out, but should the Council decide to carry out consultation it should reflect the arrangements that have applied for other Local Plan consultations.

6. Financial Implications

- 6.1. There are no specific financial implications arising from this report. There are costs associated with the length of the Local Plan Examination.

7 Risk Management Implications

- 7.1 There is a risk that the inspector may find Approach One unsound because it would delay the process of selecting site modifications. This would mean that the Council must default to the NPPF standard methodology for calculating local housing need.
- 7.2 There is a risk that the Inspector may find Approach Two of identifying Broad Locations or Areas of Search unsound.
- 7.3 There is a risk that the Council will start to receive undesirable speculative planning applications and that it might have to approve some of these or accept that they may be won on appeal if we cannot demonstrate a five year supply of housing land.
- 7.4 Should the Council put forward a strategy which is found to be unsound there is a risk that plan making powers will be removed from this Council and conferred to either another authority or consultants. The Government has already intervened and removed plan making powers from a number of authorities. Earlier this year the Government wrote to St Albans City and District Council threatening this action.

8 Security and Terrorism Implications

- 8.1 There are no security and terrorism implications arising as a result of this report.

8 Procurement Implications

- 8.1 There are no procurement implications arising directly as a result of this report.

9 Climate Change Implications

- 9.1 No climate change implications have been identified resulting from this report.

10 Policy Implications

- 10.1 The policy implications arising for Welwyn Hatfield as a result of this report are discussed in section 4 and relate to differing approach the Local Plan could take to planning for growth.

11 Link to Corporate Priorities

- 11.1 The Council's Business Plan 2015-2018 contains corporate priorities to meet the borough's housing need, help build a strong local economy, protect and enhance the environment and maintain a safe and healthy community.

12 Equality and Diversity

- 12.1 I confirm that an Equalities Impact Assessment has not been carried out.

Sue Tiley
Planning Policy and Implementation Manager
28th August 2018

Part I

Main author: Lucy Palmer

Executive Member: Cllr M Perkins

All Wards

WELWYN HATFIELD BOROUGH COUNCIL
CABINET PLANNING & PARKING PANEL – 6 SEPTEMBER 2018
REPORT OF THE CORPORATE DIRECTOR (PUBLIC PROTECTION, PLANNING AND GOVERNANCE)

FIVE YEAR LAND SUPPLY POSITION UPDATE – MAY 2018

1 Executive Summary

- 1.1 The National Planning Policy Framework requires local planning authorities to identify, and update annually, deliverable sites to supply five years' worth of housing. This is measured against either their housing requirement from adopted strategic policies or, where this is older than five years, their local housing need. The council last published its five year land supply position as of 30/09/2017 in the 2016/17 Annual Monitoring Report.
- 1.2 This report provides an interim update to the five year land supply (5YLS) which, although the council is not required to publish, is supportive to the ongoing local plan examination, as well as being beneficial in assisting with planning application decisions and appeals. The five year land supply position is presented as of 31/05/2018.

2 Recommendation(s)

- 2.1 That the Panel notes the update to the five year land supply, and that this will now be formally published on the Council's website.

3 Background

- 3.1 Paragraph 73 of the National Planning Policy Framework states that housing requirement figures from up-to-date adopted local plans will act as the starting point in the calculation of the five year land supply. Where the strategic policies in local plans are more than five years old, the assessment of local housing need should be used. This is defined in the National Planning Policy Framework (Annex 2) as "the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach". However, since the standard method uses household growth projections in its calculation, the government noted in Question 14 of its response to the NPPF consultation that it will consider adjusting the standard method of assessing housing need after the September 2018 household projections are released.
- 3.2 Given that there is the potential for imminent changes to the standard method approach, as well as the fact that the Draft Local Plan is now going through examination and gaining increasing weight, it has been concluded that using the housing target identified in the Draft Local Plan is a justified alternative approach in this instance. This approach will be tested at the Entech House planning inquiry which opens later this month.

4 Explanation

- 4.1 The five year land supply presented is an update of indicator HO6, published in the 2016/17 Annual Monitoring Report. It includes completions data up to and including 31/03/2018 and sites which have permission as of 30/05/2018.
- 4.2 The housing target in the 2016 submitted Draft Local Plan is stepped, with a lower target of 498 dwellings per annum until 2021/22, then increasing to 752 dwellings per annum from 2022/23 to the end of the plan period. This recognises various constraints which may prevent allocated development sites coming forward until later in the plan period. If an average target were used across the plan period this would equate to 632 dwellings per annum.
- 4.3 The council has, in the past, followed the 'Sedgefield' method for calculating the 5YLS, making up any shortfall over a five year period. Alternative methodologies include the 'Liverpool' method, which makes up shortfall across the entire plan period, and that of East Hertfordshire, which makes the shortfall up over a ten year period, agreed through their Local Plan Examination.
- 4.4 In this report, these scenarios are explored alongside the council's published method in order to assess what impact they would have on the 5YLS. The three scenarios presented include:
- The published method – uses the stepped target of 498 until 2021/22 and 752 thereafter and the 'Sedgefield' methodology for making up the shortfall over five years;
 - Scenario A – uses the average target of 632 dwellings per annum and the 'Liverpool' method for making up the shortfall over the plan period;
 - Scenario B – uses the average target of 632 dwellings per annum and the shortfall is made up over a ten year period, which follows the method recently used by East Hertfordshire and agreed by their inspector in the post hearing note (ED167).
- 4.5 The National Planning Policy Framework requires that either a 5% or 20% buffer be added depending on whether an area has seen 'significant under delivery of housing over the previous three years'. Looking across an average of the last three years, delivery was below target and therefore it could be argued that the 20% buffer should be applied. The three scenarios are presented with both the 5% and 20% buffer.

4.6 The required five year land supply is met in all scenarios with the impact of the differing methodologies summarised below:

Methodology	Five Year Land Supply
Published Method – 5% buffer	6.62
Scenario A – 5% buffer	6.41
Scenario B – 5% buffer	5.97
Published Method – 20% buffer	5.91
Scenario A – 20% buffer	5.71
Scenario B – 20% buffer	5.36

Implications

5 Legal Implication(s)

5.1 There are no legal implications as a result of publishing the 5YLS update.

6 Financial Implication(s)

6.1 There are no financial implications arising as a direct result of producing the 5YLS update.

7 Risk Management Implications

7.1 There are no identified risk management implications as a result of publishing the 5YLS update.

8 Security & Terrorism Implication(s)

8.1 There are no security and terrorism implications as a result of publishing the 5YLS update.

9 Procurement Implication(s)

9.1 There are no procurement implications arising as a result of publishing the 5YLS update.

10 Climate Change Implication(s)

10.1 There are no climate change implications arising as a result of publishing the 5YLS update.

11 Policy Implication(s)

11.1 There are no policy implications arising as a result of publishing the 5YLS update. However, if the housing requirement is amended as a consequence of proposed modifications to the Plan this will affect the calculation of the 5YLS, which would subsequently need to be amended. Should the Council's argument for the justified

alternative approach be unsuccessful on appeal the calculation of the five year land supply will be revisited.

12 Link to Corporate Priorities

12.1 The production of the 5YLS update is linked to Priority 3 (meet the borough's housing needs).

13 Equality and Diversity

13.1 An Equality Impact Assessment (EIA) has not been carried out, as the 5YLS update does not include any proposals in its own right.

Lucy Palmer
Planning & Data Analysis Officer – Planning Policy

20 August 2018

Appendices:

Appendix 1 – Five Year Land Supply Position Update (as of 31/05/18)

Five Year Housing Land Supply Position Update - May 2018

The five year land supply presented here is an update of Indicator HO6, published in the 2016/17 Annual Monitoring Report. It includes completions up to and including 31/03/2018 and sites which have permission *as of 30/05/18*.

The housing target in the 2016 submitted draft Local Plan is stepped, with a lower target of 498 dwellings per annum until 2021/22, then increasing to 752 dwellings per annum from 2022/23 until the end of the plan period. This recognises constraints around infrastructure, land ownership and deliverability which may prevent allocated development sites coming forward until later in the plan period.

This calculation of the five-year land supply follows the more rigorous '**Sedgefield**' method - where the shortfall is incorporated and made up within a five year period.

The above methodology is our published method for calculating the five year land supply. However, we also present here two alternative approaches which use the average housing target of 632 dpa, based on the 2016 submitted draft local plan housing requirement of 12,000 dwellings. The impact of making up the shortfall over a longer period is explored through two approaches; scenario A, which follows the 'Liverpool' method, where shortfall is made up across the whole plan period, and scenario B which follows that of East Hertfordshire, as recently agreed by their inspector in post hearing note (ED167), which makes up the shortfall over ten years.

The housing trajectory summary table (an update of Appendix 2 from the 2016/17 AMR) shows all sites contributing to the five year land supply which have planning permission or have been allocated. It does not include sites which have been completed, or sites which are expected to commence outside the five year period. However, it does include the number of dwellings which are to be built beyond 2023/24 for sites where some dwellings are expected within the five year period.

Published Method: Housing Land Supply Calculation – May 2018

Figures frozen as of 31/05/2018

A	Housing target 2019/20-2023/24 (3 x 498dpa + 2 x 752 dpa) ¹	2,998
B	Completions within plan period to date (2013/14 to 2017/18)	1,804
C	Projected completions for current year (2018/19) ²	567
D	Target completions to current year (6 years at 498dpa, from 2013/14 to 2018/19)	2,988
E	Shortfall to end of current year (D - B - C)	617
F	NPPF 5% buffer adjustment (A x 0.05) ³	150
G	Housing requirement for 5-year period (A + E + F) ⁴	3,765
H	Projected supply of sites in 5-year period (2019/20 to 2023/24) ⁵	4,306
I	Allowance for planning applications awaiting determination ⁶	565
J	Windfall assumption for 2021/22 and 2022/23 (70 x 2) ⁷	140
K	Non-implementation rate (1,153 x 0.025) ⁸	-29
L	Actual projected five year supply (H + I + J + K)	4,982
	Number of years supply (L divided by G, multiplied by 5 years)	6.62

¹ The submitted draft local plan target is split and is lower in the earlier part of the plan period than the latter - 498 dwellings per annum until 2021/22 and then 752 dwellings per annum from 2022/23 until the end of the plan period.

² See the housing trajectory summary table for further detail.

³ The NPPF requires either a 5% or 20% buffer to be added depending on whether an area has seen 'significant under delivery of housing over the previous three years'. On average over the last three years delivery has been below the Draft Local Plan target, as a result it could be argued that a 20% buffer should apply.

⁴ Incorporating the shortfall from Row E in this way follows the more stringent 'Sedgefield' method, where past undersupply is met within the 5-year period rather than being spread across the whole plan period.

⁵ See the housing trajectory summary table for further detail.

⁶ Based on applications for sites expected to deliver dwellings within the five year period at the point the trajectory was frozen – some of these have subsequently been approved or are awaiting the signing of a S106 agreement.

⁷ The rate calculated in the 2016 Housing and Employment Land Availability Assessment – no windfall is expected in years 1-3 as the sites to be delivered in those years are likely to already be known about.

⁸ The historic proportion of dwellings granted permission but never built is 2.5%.

Alternative Scenarios:

Scenario A

Uses the average housing target of 632 dwellings per annum based on the 2016 submitted draft local plan housing requirement of 12,000 dwellings, with the shortfall made up across the whole plan period of 15 years (following the 'Liverpool' method).

A	Housing target 2019/20-2023/24 (5 x 632 dpa)	3,160
B	Completions within plan period to date (2013/14 to 2017/18)	1,804
C	Projected completions for current year (2018/19)	567
D	Target completions to current year (6 years at 632 dpa)	3,792
E	Shortfall to end of current year (made up across plan period)	568
F	NPPF 5% buffer adjustment (A x 0.05)	158
G	Housing requirement for 5-year period (A + E + F)	3,886
H	Projected supply of sites in 5-year period (2019/20 to 2023/24)	4,306
I	Allowance for planning applications awaiting determination	565
J	Windfall assumption for 2021/22 and 2022/23 (70 x 2)	140
K	Non-implementation rate (1,153 x 0.025)	-29
L	Actual projected five year supply (H + I + J + K)	4,982
Number of years supply (L divided by G, multiplied by 5 years)		6.41

Scenario B

Uses the average housing target of 632 dwellings per annum based on the 2016 submitted draft local plan housing requirement of 12,000 dwellings, with the shortfall made up over a ten year period.

A	Housing target 2019/20-2023/24 (5 x 632 dpa)	3,160
B	Completions within plan period to date (2013/14 to 2017/18)	1,804
C	Projected completions for current year (2018/19)	567
D	Target completions to current year (6 years at 632 dpa)	3,792
E	Shortfall to end of current year (made up across 10 years)	853
F	NPPF 5% buffer adjustment (A x 0.05)	158
G	Housing requirement for 5-year period (A + E + F)	4,171
H	Projected supply of sites in 5-year period (2019/20 to 2023/24)	4,306
I	Allowance for planning applications awaiting determination	565
J	Windfall assumption for 2021/22 and 2022/23 (70 x 2)	140
K	Non-implementation rate (1,153 x 0.025)	-29
L	Actual projected five year supply (H + I + J + K)	4,982
Number of years supply (L divided by G, multiplied by 5 years)		5.97

If the opinion is taken that a 20% buffer should be applied, the impact on the three methodologies is presented below:

Published Method: Housing Land Supply Calculation – May 2018

Figures frozen as at 31/05/2018

A	Housing target 2019/20-2023/24 (3 x 498dpa + 2 x 752 dpa)	2,998
B	Completions within plan period to date (2013/14 to 2017/18)	1,804
C	Projected completions for current year (2018/19)	567
D	Target completions to current year (6 years at 498dpa)	2,988
E	Shortfall to end of current year (D - B - C)	617
F	NPPF 20% buffer adjustment (A x 0.20)	600
G	Housing requirement for 5-year period (A + E + F)	4,215
H	Projected supply of sites in 5-year period (2019/20 to 2023/24)	4,306
I	Allowance for planning applications awaiting determination	565
J	Windfall assumption for 2021/22 and 2022/23 (70 x 2)	140
K	Non-implementation rate (1,153 x 0.025)	-29
L	Actual projected five year supply (H + I + J + K)	4,982
Number of years supply (L divided by G, multiplied by 5 years)		5.91

Scenario A

Uses the average housing target of 632 dwellings per annum based on the 2016 submitted draft local plan housing requirement of 12,000 dwellings, with the shortfall made up across the whole plan period of 15 years (following the 'Liverpool' method).

A	Housing target 2019/20-2023/24 (5 x 632 dpa)	3,160
B	Completions within plan period to date (2013/14 to 2017/18)	1,804
C	Projected completions for current year (2018/19)	567
D	Target completions to current year (6 years at 632 dpa)	3,792
E	Shortfall to end of current year (made up across plan period)	568
F	NPPF 20% buffer adjustment (A x 0.20)	632
G	Housing requirement for 5-year period (A + E + F)	4,360
H	Projected supply of sites in 5-year period (2019/20 to 2023/24)	4,306
I	Allowance for planning applications awaiting determination	565
J	Windfall assumption for 2021/22 and 2022/23 (70 x 2)	140
K	Non-implementation rate (1,153 x 0.025)	-29
L	Actual projected five year supply (H + I + J + K)	4,982
Number of years supply (L divided by G, multiplied by 5 years)		5.71

Scenario B

Uses the average housing target of 632 dwellings per annum based on the 2016 submitted draft local plan housing requirement of 12,000 dwellings, with the shortfall made up over a ten year period.

A	Housing target 2019/20-2023/24 (5 x 632 dpa)	3,160
B	Completions within plan period to date (2013/14 to 2017/18)	1,804
C	Projected completions for current year (2018/19)	567
D	Target completions to current year (6 years at 632 dpa)	3,792
E	Shortfall to end of current year (made up across 10 years)	853
F	NPPF 20% buffer adjustment (A x 0.20)	632
G	Housing requirement for 5-year period (A + E + F)	4,645
H	Projected supply of sites in 5-year period (2019/20 to 2023/24)	4,306
I	Allowance for planning applications awaiting determination	565
J	Windfall assumption for 2021/22 and 2022/23 (70 x 2)	140
K	Non-implementation rate (1,153 x 0.025)	-29
L	Actual projected five year supply (H + I + J + K)	4,982
Number of years supply (L divided by G, multiplied by 5 years)		5.36

Housing Trajectory Summary Table to 2023/24

This table includes all sites contributing to the five year housing land supply set out above. It does not include dwellings which have been completed, or sites where *all* dwellings are expected to be completed beyond the 2023/24. However, it does show the number of dwellings expected to be built beyond 2023/24 for sites where some dwellings are expected within the five year period.

Local Plan Reference	Site Name	Planning Application Reference	Site Status	This year 2018/19	Five year land supply						Beyond 2023/24	
					2019/20	2020/21	2021/22	2022/23	2023/24	Total		
HS22	Land west of Brookmans Park Railway Station	N/A	LP				50	50	50	150	100	
HS21	Land west of Golf Club Road	N/A	LP			14				14		
-	Land north of Green Close	6/2016/0192/MAJ	UC	12								
HS23	Land east of Golf Club Road	N/A	LP				10			10		
-	11 Brookmans Avenue	6/2016/1778/FULL	PG	5								
-	5 x small sites (less than 5 dwellings) under construction	various	UC	7								
-	10 x small sites (less than 5 dwellings) permission granted	various	PG	-1	-1	9				8		
Total for Brookmans Park				23	-1	23	60	50	50	182	100	
HS28	Land south of Northaw Road East (Green Belt)	S6/2015/1342/PP	LP		5	30	40	33		108		
HS29	Land north of Northaw Road East (Green Belt)	N/A	LP					35	38	73		
-	Everest House, Sopers Road	S6/2015/1119/OR	PG	5	40					40		
HS27	Land at The Meadway (Green Belt)	N/A	LP			15	15			30		
-	Cuffley Motor Company, Station Road	6/2016/0887/MAJ	PG		12					12		
HS26	36 The Ridgeway and land to the rear	N/A	LP		-1	9				8		
-	Land adjacent to 17 Station Road	6/2016/1857/FULL	UC	5								
-	1 x small sites (less than 5 dwellings) under construction	various	UC	2								
-	10 x small sites (less than 5 dwellings) permission granted	various	PG	-1	4	6				10		
Total for Cuffley				11	60	60	55	68	38	281	-	
-	54 New Road	6/2017/1254/FULL	PG		-1	5				4		
-	4 x small sites (less than 5 dwellings) under construction	various	UC	4								
Total for Digswell				4	-1	5				4	-	
SDS5	North West Hatfield	N/A	LP			60	100	100	130	390	1,260	
HS11	Land at Southway	N/A	LP				40	40	40	120		
MUS3	Highview (Hilltop) SPD Site	N/A	LP		-6	31	31	31		87		
MUS2	1-9 Town Centre	N/A	LP			33	33			66		
-	Comet Hotel, St Albans Road West	6/2016/1739/MAJ	PG	31	31					31		
HS9	Land at Onslow St Audrey's School, Howe Dell	6/2017/1641/MAJ	LP	-1	31	31				62		
-	Garages off Garden Avenue	S6/2014/2179/MA	UC	22								
-	Colonial House, 87 Great North Road	S6/2014/1541/MA	UC	20								
-	GE Site, Great North Road (South)	6/2015/1774/MAJ	UC	18								
-	36 Salisbury Square (1st and 2nd floor conversion)	6/2017/1176/PN11	PG		16					16		
-	41-43 Roe Green Lane	6/2016/0345/MAJ	UC	16								
HS10	Garages at Hollyfield	N/A	LP		14					14		
-	Garages off Hillcrest	S6/2015/1035/FP	UC	8								
-	Garages off Little Mead	6/2017/0546/FULL	PG	-2	7					7		
-	Northdown Road Bedsits	6/2016/1091/DC3	UC	-8	16					16		
-	12 Harpsfield Broadway	6/2018/0233/PN11	PG			4				4		
-	4x small sites (less than 5 dwellings) under construction	various	UC	4								
-	15x small sites (less than 5 dwellings) permission granted	various	PG	3	14	3				17		
Total Hatfield				111	123	162	204	171	170	830	1,260	
HS25	Land south of Hawkshead Road	N/A	LP				34	33	33	100		
HS24	Land north of Hawkshead Road	N/A	LP			17	18			35		
-	1 x small site (less than 5 dwellings) under construction	N/A	UC	2								
Total Little Heath				2	0	17	52	33	33	135	-	
-	Land adjacent to 82 Great North Road	6/2017/0547/FULL	UC	10								
HS32	Four Oaks, Great North Road	N/A	LP			6				6		
HS16	2 Great North Road	N/A	LP				5			5		
-	6x small sites (less than 5 dwellings) under construction	various	UC	9	1					1		
-	6x small sites (less than 5 dwellings) permission granted	various	PG	-4	11					11		
Total Oaklands and Mardley Heath				15	12	6	5			23	-	
SDS7	Marshmoor	N/A	LP						40	40	40	
HS35	Foxes Lane, Dixons Hill Road	N/A	LP		12					12		
-	2x small sites (less than 5 dwellings) permission granted	various	PG	-2	3					3		
Total Welham Green				-2	15					40	55	40

Local Plan Reference	Site Name	Planning Application Reference	Site Status	This year 2018/19	Five year land supply						Beyond 2023/24
					2019/20	2020/21	2021/22	2022/23	2023/24	Total	
-	The Frythe (Phase 1 - East)	N6/2013/1994/DE	UC	2							
-	The Frythe (Phase 3 - Main House Conversion)	N6/2013/2727/DE	UC	12							
-	The Frythe (Phase 4 - West)	N6/2014/0208/DE	UC	27							
HS19	Sandyhurst, The Bypass	N/A	LP		15	15				30	
HS18	The Vineyards	N/A	LP		15	15				30	
HS20	School Lane	N/A	LP		7					7	
-	29 Mill Lane	N6/2015/0553/OR	UC	4							
-	8-10 Wendover Drive	6/2016/2699/FULL	UC	5							
	3x small sites (less than 5 dwellings) under construction	various	UC	4							
	1x small site (less than 5 dwellings) permission granted	various	PG	1							
Total Welwyn				55	15	37	15			67	
SDS2	South east of Welwyn Garden City	N/A	LP		100	100	100	100	100	400	800
SDS1	North east of Welwyn Garden City	N/A	LP		50	100	100	100	100	350	300
SDS3	Broadwater Road West SPD Site	N6/2015/0294/PP	UC		110	257	237	246		850	
HS2	Creswick	N/A	LP		50	80	80	80		290	116
-	Former QEII Hospital, Howlands (East)	6/2015/1901/RM	UC	68	56					56	
-	Xerox Campus, Bessemer Road (New build - West, Blocks X2 and X3)	6/2016/1975/RM	PG		70	55				125	
-	Xerox Campus, Bessemer Road (New build - East, Blocks X1 and X4)	6/2016/1176/RM	UC	50	60					60	
HS4	Ratcliff Tail Lift Site, Bessemer Road	N/A	LP			55	55			110	
-	Xerox Campus, Bessemer Road (Bus/Entp/Dev Centre - Prior approval)	N6/2015/1049/OR	UC	70							
-	Inspira House, Martinfield	6/2017/1519/PN11	PG		54					54	
-	Xerox Campus, Bessemer Road (Entp/Dev Centre - Additional units)	6/2015/2213/MAJ	UC	22	22					22	
-	Xerox Campus, Bessemer Road (Technical Centre X6)	6/2017/1568/MAJ	PG		38					38	
-	Mercury House, 1 Broadwater Road	6/2016/2624/FULL	UC	43							
-	51 Bridge Road East	6/2017/2104/MAJ	PG		54					54	
HS3	80 Bridge Road East	N/A	LP						16	16	16
-	Xerox Campus, Bessemer Road (New build - Central, Block X5)	6/2016/2690/MAJ	UC	30							
HS1	Land at Bericot Way (North)	6/2017/2202/OUTLINE	LP		14	7				21	
-	37 Broadwater Road	6/2016/2497/MAJ	PG		24					24	
-	Highways House, 41-45 Broadwater Road (North)	N6/2015/0034/MA	UC	23							
HS5	Hyde Valley House, Hyde Valley	N/A	LP		-1	18				17	
-	Accord House, 28 Bridge Road East	6/2017/0525/PN11	PG		17					17	
-	Fountain House, Howardsgate (First and second floor conversion)	6/2017/1686/PN11	PG		14					14	
-	Fountain House, Howardsgate (Roof Extension, Third floor)	6/2017/0400/FULL	PG		8					8	
-	Stonehills House, Stonehills (Additional units)	6/2016/0818/MAJ	UC	12							
-	Walnut House, 1 Walnut Grove	6/2017/1149/FULL	PG		4					4	
-	Garages off Great Gannett	N6/2015/1131/FP	UC	5							
Sh91	15 Digswell Park Road	N/A	HL		-1	5				4	
Hol20	Land north of The Beehive PH, Beehive Lane	N/A	HL			5				5	
-	4x small sites (less than 5 dwellings) under construction	various	UC	6	1					1	
-	12x small sites (less than 5 dwellings) permission granted	various	PG	5	13					13	
Total Welwyn Garden City				334	272	495	672	572	542	2553	1,232
HS15	Land east of London Road	N/A	LP			50	50	50		150	
Total Woolmer Green						50	50	50		150	
-	2 New Road (North), Stanborough	6/2015/1983/FULL	PG		4					4	
-	Land at The Firs Park, Woodside Lane, Brookmans Park	6/2016/1466/LAWP	PG	8							
-	Firs Stables, Woodside Lane	S6/2014/1403/OP	PG	5							
-	Swan Lodge, Bell Lane, Brookmans Park	6/2016/0168/FULL	PG	-1	8					8	
-	Ponsbourne Riding Centre, Newgate Street	6/2016/2706/MAJ	PG		6					6	
HS33	Barbraville, Hertford Road, Mill Green	N/A	LP				4			4	
-	2x small sites (less than 5 dwellings) under construction	various	UC	2							
-	12x small sites (less than 5 dwellings) permission granted	various	PG		-3	7				4	
Total Rural Areas				14	15	7		4		26	
TOTAL				567	510	812	1,113	948	923	4,306	

Site Status:

UC	Site with planning permission, under construction
PG	Site with planning permission, not yet under construction
LP	Site proposed for allocation in the Draft Local Plan undergoing examination
HL	Site found suitable in the 2016 HELAA, but too small to allocate in the Local Plan

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