

Appendix A1

**Main Issues Legal Compliance Summary
Draft Local Plan Proposed Submission (DLPPS)
DLPPS Policies Maps (PSPM)
Sustainability Appraisal of the DLPPS (SA)
Habitats Regulations Assessment of the DLPPS (HRA)**

Comments relating to the legal tests of:

- Whether the Plan meets the requirements for content and consultation set out in the Town and Country Planning (Local Planning) Regulations 2012 and / or
- Whether the Plan has been prepared in accordance with the Council's most recent Statement of Community Involvement (SCI)

DLPPS no.	Reason	Changes Sought	WHBC response
66 responses (dlpps no's listed below)	<p>The Plan fails to reflect public opinion and the outcomes of past consultation, contrary to the SCI</p> <p>Proposals in the Plan and the Council's arguments in favour of development are unchanged from previous consultations, despite respondents pointing out issues and errors. There is no evidence that the community supports the proposals set out in the Plan. Regulation 18 of the Town and County Planning Regulations 2012 requires a local authority to take into account any representation made to them.</p> <p>Councillors should be representing their constituents' strongly held views when they are voting on important matters that will affect the lives of residents. However, some are being restrained by the Council leadership.</p>	<p>Variously:</p> <ul style="list-style-type: none"> • Amend the Plan to reflect public opinion, and the outcomes of past consultation • Carry out consultation in accordance with the SCI • The Inspector should be shown recordings of Council meetings <p>As above</p>	<p>Consultation Statements have been published after each stage of consultation. The Council must balance local views with responses from statutory consultees, and ultimately its obligations under national planning policy in order for the Plan to be found sound. The Plan has evolved from previous consultations, and all representations are taken into account. However, it is impossible to satisfy all respondents (who often hold opposing views). This does not constitute a failure against the regulations and SCI. No change.</p> <p>The Council must make decisions for the benefit of the entire borough, which cannot always satisfy every local view. This is an inherent reality, and does not constitute a failure against the SCI. No change.</p>

DLPPS no.	Reason	Changes Sought	WHBC response
	<p>Council meetings are undemocratic. Official minutes for these meetings don't capture the views expressed and the way residents are treated.</p> <p>Residents at the Woolmer Green Parish Council meeting (12 October 2016) voted unanimously against the Plan on Green Belt grounds, but their views and intent were not conveyed.</p>	<p>As above</p> <p>As above</p>	<p>Minutes are certified as a true record of the meeting at the next meeting held, providing an opportunity for inaccuracies to be identified. Recordings of key meetings on the Local Plan have also been made available on the YouTube channel. No change.</p> <p>Representations received from the Parish Council and village residents are taken into account (a petition was submitted). However, the Council must balance local views with responses from other consultees, and ultimately its obligations under national planning policy in order for the Plan to be found sound. It is impossible to satisfy all respondents. This does not constitute a failure against the regulations and SCI.</p> <p>No change.</p>

DLPPS no.	Reason	Changes Sought	WHBC response
82 responses (dlpps no's listed below)	<p>The Council has not carried out 'early and meaningful engagement', as required by NPPF para 155.</p> <p>There is no clear evidence that nearby district and parish councils have been consulted on the Plan (those identified include North Herts, St Albans, Broxbourne and Hertsmere Councils; and North Mymms, Wheathampstead, Sandridge and Colney Heath Parish Councils).</p> <p>The Council has failed to consult other bodies; such as environmental groups, service providers, landowners and businesses.</p>	<p>Provide a statement that details the outcomes of co-operation and consultation, not simply a list of the consultation procedures adopted, as presently the case in para 2.38 - 2.42.</p> <p>None stated.</p>	<p>Early engagement commenced in 2007 and has continued since then. The Statements of Consultation set out what engagement has taken place; the issues raised and how they have been taken into account. All of the organisations cited have been consulted on the Plan, indeed all have responded to consultation at various stages. No change.</p> <p>Other key stakeholders such as environmental groups, service providers and the owners of sites with potential for allocation are all on the Council's consultation database, and have been consulted (and responses have informed the plan) as it has evolved. Business representatives (such as Chambers of Commerce) are also actively consulted, and this claim is not accepted. No change.</p>

DLPPS no.	Reason	Changes Sought	WHBC response
	<p>The Council has failed to consult with the wider community affected by proposals in the Plan (areas identified include St Albans, Sandridge, Wheathampstead, Marshalswick and Potters Bar). The proposals in the Plan have also generally not received the publicity they require.</p> <p>The Council has not consulted in an effective manner, with a disingenuous and confusing process intended to discourage engagement. It has therefore been carried out in a manner contrary to the SCI.</p>	<p>Hold the consultation again, and reflect the views of people living in the areas identified who will be every bit as affected by the Plan as borough residents.</p> <p>Hold the consultation again, and engage the public in layman terms. All local residents should also be properly briefed about proposals in the Plan.</p>	<p>Whilst residents in these areas (outside the borough) do not receive Life Magazine, the Council has ensured that community representatives (such as Parish Councils and Community Groups registered on the consultation database) were consulted. The large number of responses received from these areas means that there is a general awareness of the proposals in the Plan. No change.</p> <p>The Local Plan is necessarily complex, but this is recognised. The SCI states that concise summaries of the proposals and process will be produced, and events held where clarification can be sought from staff. This has been done, e.g. a Summary Guide to the Local Plan was produced and a series of events were held across the borough for anyone with an interest to attend and ask questions. These claims are not accepted.</p> <p>No change.</p>

DLPPS no.	Reason	Changes Sought	WHBC response
83, 92, 93, 103, 112, 114, 146, 372, 532, 525, 833, 839, 862, 1081, 1092, 1279	<p>The Local Plan is not compliant with Regs. 18 and 19 of the Town and Country Planning Regulations 2012.</p> <p>Relevant individuals and groups have not been consulted on this and previous consultations, contrary to what is required in the regulations.</p> <p>The Council is aware that the Local Plan is not sound, and should not be carrying out Regulation 19 consultation. This is a waste of time and public funds.</p>	<p>Hold the consultation again.</p> <p>The Council should cease the present consultation until the plan has been made sound.</p>	<p>The Statements of Consultation set out what engagement has taken place; the issues raised and how they have been taken into account. The Council has consulted extensively, with regard to realistic constraints, and there is not considered to be any failing against Regs 18/19. No change.</p> <p>This claim is baseless. The Council considers the Plan to be sound, and would not have carried out consultation unless this was the case. No change.</p>
29, 126, 132, 337, 400, 496, 711, 747, 809, 985, 994, 1107, 1190	<p>The Council has not engaged effectively with ‘hard to reach groups’, contrary to the SCI</p> <p>There has been a general failure at this consultation to consult young people, older people, disabled people and ethnic minorities.</p>	<p>Better engagement with these groups is required.</p>	<p>Older people have responded in disproportionately large numbers, and are not ‘hard to reach’. Social media has also been used to help generate engagement with those who may be ‘hard to reach’. No change.</p>
	<p>There has been poor engagement with Gypsies and Travellers on the latest Accommodation Needs Assessment (ANA) and the Local Plan in general. There were 34 respondents from the Holwell Gypsy and Traveller site in 2011, but only 9 in 2016 and yet this is still deemed to be ‘sufficient’.</p>	<p>Better engagement with Gypsies and Travellers is required.</p>	<p>The Gypsy and Traveller community have been consulted from early stages of plan preparation and have participated in consultation events. There was a high level of engagement with</p>

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			<p>the GTANA in 2011 and all reasonable efforts were made when preparing the 2016 GTANA to engage with Gypsies and Travellers. However, for various reasons (identified in the GTANA) members of the community were more reluctant to respond.</p> <p>No change.</p>
<p>6, 677, 883, 999, 1412, 1442</p>	<p>The consultation has not been carried out in an effective manner, limiting engagement</p> <p>The Council relaxed the rules for consultation in the week before closing such that they would now allow general letters or emails, but the insistence on using the form prior to that created restrictions for many residents and possibly altered the final outcome.</p> <p>Inconsistent advice was given by the Council on whether handwritten forms were acceptable, or only the online form could be submitted. The SCI should provide information on how to use the system.</p>	<p>Void the current consultation period, and carry out a fresh consultation with more relaxed rules promoted correctly from the outset.</p> <p>As above</p>	<p>The Council did encourage respondents to use the form, as this was designed to help them understand the process the Inspector will go through when examining the Plan and should help respondents to make more useful, structured responses. However, the Council did not insist on use of the form and letters and emails submitted during the consultation period were accepted as duly made. No change.</p> <p>Whilst use of the online system is preferred, paper forms were made available at all of the inspection points and at all of the consultation events, where officers were on hand to offer assistance. Additional forms and Summary Guides were also provided on</p>

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	<p>It was very difficult to use the online form – the website is poorly constructed, has limited functionality, and has not been designed with non-technical users in mind. This created problems for older people trying to respond to the consultation, not comfortable using the online system.</p> <p>The Local Plan consultation events were only advertised in the Welwyn Hatfield Times, and even then there was no advance notice of them.</p>	<p>As above</p> <p>As above</p>	<p>request to community groups. Help is available from officers in the event that respondents are unable to use the on-line system but as mentioned above, paper forms, letters and emails were all accepted.</p> <p>No change.</p> <p>The Council recognises that not all respondents will be comfortable using the online system, and this is why paper forms are provided. Given the disproportionately high level of response from older people, there is no concern that older people were put off responding. No change.</p> <p>This claim is incorrect and is not accepted. The events were advertised widely and well in advance, and through a variety of means. Letters and emails, notifying thousands of consultees on the Local Plan database, were sent out around 2 weeks in advance of the first event, and around 6 weeks in advance of the last event. Whilst the Welwyn Hatfield Times only published an article the day before the first event, residents were free to attend any event held between the</p>

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	<p>There has been no clear guidance on how to comment on the legality of the Plan, e.g. an explanation of what would (or would not) be legal.</p>	<p>As above</p>	<p>end of August and the beginning of October. In addition, documents were made available at 16 locations across the borough including libraries and Parish Council offices. No change.</p> <p>A Guidance Note for Respondents was made available at inspection points, consultation events and online. This highlighted what the legal tests were and provided links to relevant legislation and the SCI. Officers were available at all the consultation events to assist further. However, it is ultimately for respondents to formulate their responses should they wish to do so. No change.</p>
<p>525, 829, 1127</p>	<p>Other reasons: Essential documents are missing from the Councils evidence base. This is particularly true of the total lack of any significant information on Site HS22 (BrP4).</p>	<p>Make this information available, and carry out a fresh Reg 19 consultation.</p>	<p>Consideration of Site HS22 (BrP4), in common with all other proposed allocations, is set out in the HELAA, Phase 2 Green Belt Study, Strategic Flood Risk Assessment and Housing Site Selection Background Papers. It is unclear what additional evidence would be 'essential' at a site allocation stage where the evidence base is required to be proportionate to the plan-making process. No change.</p>

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	<p>The Council has relied upon the 'charrette' as its consultation on Site SDS6 (Symondshyde). This was developer-led, and very one-sided.</p> <p>The SCI is itself poorly written, for example it does not provide any definition of what the Council considered it's hard to reach groups to be.</p>	<p>None stated.</p> <p>Improve the SCI.</p>	<p>The charrette was organised by the landowner and was in addition to consultation carried out by the Council on the Local Plan. No change.</p> <p>This is not accepted – the SCI sets out those groups considered hard to reach at the time it was written. However, the hard to reach 'status' of groups can change between consultations, often depending on the issues involved. The Annual Monitoring Report analyses and monitors the groups that are currently hard to reach. No change.</p>

Full list of dlpps numbers commenting on 'The Plan fails to reflect public opinion and the outcomes of past consultation, contrary to the SCI': 29, 33, 35, 66, 83, 92, 93, 103, 112, 114, 146, 151, 197, 256, 337, 342, 371, 372, 384, 385, 391, 415, 522, 525, 531, 532, 538, 545, 566, 586, 677, 680, 682, 692, 705, 762, 763, 766, 799, 803, 806, 836, 861, 863, 870, 885, 905, 907, 925, 959, 960, 964, 994, 985, 1008, 1039, 1081, 1084, 1104, 1122, 1126, 1127, 1134, 1158, 1196, 1246

Full list of dlpps numbers commenting on 'The Council has not carried out 'early and meaningful engagement', as required by NPPF para 155': 1, 29, 95, 112, 113, 116, 117, 126, 146, 179, 337, 371, 372, 400, 419, 496, 532, 554, 557, 640, 677, 680, 690, 691, 705, 711, 723, 727, 729, 747, 754, 800, 801, 807, 809, 833, 839, 854, 862, 891, 907, 920, 941, 962, 966, 993, 994, 995, 999, 1010, 1011, 1016, 1056, 1083, 1092, 1104, 1122, 1127, 1153, 1158, 1177, 1190, 1196, 1248, 1279, 1306, 1310, 1401, 1402, 1403, 1411, 1417, 1426, 1442, 1453, 1522, 1527, 1627, 2087, 2093, 2167

A further 504 respondents ticked boxes to indicate their view that the Plan does not meet the requirements in the Town and Country Planning Regulations 2012, and that the Plan has not been prepared in accordance with the Council's most recent Statement of Community Involvement, but did not provide any reasons. These dlpps numbers are: 1, 6, 10, 11, 29, 44, 49, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 67, 68, 69, 70, 71, 72, 73, 75, 76, 77, 78, 80, 83, 84, 89, 91, 92, 93, 95, 96, 99, 100, 101, 102, 103, 106, 110, 111,

112, 113, 114, 116, 117, 120, 121, 124, 128, 129, 131, 132, 137, 138, 140, 142, 146, 147, 149, 150, 156, 157, 158, 159, 160, 163, 177, 179, 180, 181, 186, 187, 192, 194, 195, 196, 198, 201, 202, 205, 206, 209, 213, 214, 216, 222, 223, 225, 230, 234, 241, 243, 244, 247, 248, 251, 254, 255, 257, 258, 261, 263, 266, 269, 276, 278, 279, 283, 289, 292, 293, 297, 298, 299, 310, 313, 324, 326, 328, 329, 331, 337, 345, 347, 371, 372, 374, 381, 391, 392, 393, 399, 400, 401, 403, 405, 406, 407, 408, 416, 417, 419, 421, 431, 436, 437, 439, 440, 441, 446, 454, 460, 465, 467, 473, 475, 476, 477, 484, 485, 486, 493, 495, 496, 518, 523, 525, 526, 530, 532, 533, 534, 535, 537, 539, 540, 546, 554, 557, 562, 563, 564, 565, 570, 571, 572, 574, 576, 586, 588, 590, 593, 598, 599, 600, 602, 603, 607, 626, 628, 634, 639, 640, 643, 655, 657, 658, 659, 660, 661, 663, 671, 674, 677, 679, 680, 681, 689, 690, 691, 692, 695, 698, 701, 702, 703, 704, 705, 706, 707, 708, 709, 711, 722, 723, 724, 726, 727, 729, 734, 736, 737, 738, 740, 741, 742, 743, 744, 745, 747, 748, 749, 750, 751, 754, 756, 762, 800, 801, 807, 809, 810, 811, 812, 815, 816, 821, 823, 824, 825, 827, 828, 831, 832, 833, 837, 838, 839, 840, 843, 845, 846, 847, 850, 853, 854, 855, 857, 858, 859, 861, 862, 864, 868, 869, 874, 891, 893, 898, 899, 904, 907, 908, 910, 911, 914, 920, 921, 922, 923, 929, 930, 931, 932, 933, 934, 937, 940, 941, 942, 953, 954, 955, 956, 957, 962, 965, 966, 975, 976, 977, 978, 979, 980, 982, 993, 995, 997, 998, 999, 1003, 1004, 1006, 1010, 1011, 1016, 1029, 1031, 1037, 1039, 1040, 1056, 1057, 1062, 1063, 1065, 1066, 1073, 1075, 1081, 1083, 1084, 1085, 1086, 1087, 1091, 1092, 1094, 1099, 1100, 1101, 1103, 1104, 1105, 1107, 1113, 1114, 1115, 1116, 1117, 1118, 1120, 1123, 1124, 1125, 1127, 1132, 1133, 1136, 1138, 1143, 1149, 1153, 1158, 1160, 1163, 1177, 1180, 1182, 1183, 1186, 1188, 1189, 1191, 1192, 1193, 1194, 1195, 1196, 1201, 1202, 1203, 1204, 1215, 1216, 1238, 1247, 1248, 1260, 1268, 1279, 1289, 1355, 1306, 1309, 1310, 1315, 1317, 1332, 1337, 1338, 1339, 1341, 1357, 1358, 1359, 1362, 1364, 1370, 1374, 1377, 1378, 1400, 1401, 1402, 1403, 1406, 1411, 1412, 1417, 1426, 1442, 1453, 1486, 1522, 1524, 1527, 1533, 1557, 1573, 1578, 1594, 1627, 1647, 1658, 1663, 1664, 1684, 1691, 1695, 1697, 1702, 1712, 1714, 1718, 1720, 1724, 1733, 1747, 1785, 1839, 1861, 1941, 1942, 1943, 2042, 2043, 2047, 2094, 2086, 2087, 2088, 2093, 2167

A further 96 respondents ticked the box just to indicate their view that the Plan has not been prepared in accordance with the Council's most recent Statement of Community Involvement, but did not provide any reasons. These dlpps numbers are: 33, 34, 35, 43, 66, 90, 151, 185, 197, 239, 256, 262, 342, 384, 415, 514, 522, 531, 538, 545, 547, 566, 567, 583, 584, 627, 642, 682, 683, 684, 685, 693, 753, 761, 762, 763, 764, 766, 798, 799, 803, 806, 836, 851, 860, 863, 866, 867, 870, 884, 885, 897, 905, 913, 915, 925, 936, 949, 959, 960, 963, 964, 969, 985, 989, 994, 996, 1015, 1024, 1026, 1067, 1122, 1126, 1246, 1284, 1288, 1294, 1300, 1304, 1308, 1398, 1408, 1440, 1574, 1576, 1580, 1582, 1597, 1903, 1946, 2096, 2097, 2098, 2099, 2100, 2101

Comments relating to the legal tests of:

- **Whether the Sustainability Appraisal accompanying the Plan forms a suitable assessment of the sustainability of the Council's proposals and follow the Sustainability Appraisal guidance set out in Planning Practice Guidance; and / or**
- **Whether the Habitats Regulations Assessment accompanying the Plan complies *with the requirements of the Conservation of Habitats and Species Regulations 2010 (as amended)*.**

DLPPS no.	Main Issue	Changes Sought	WHBC response
102 responses (dlpps no's listed below)	<p>Not accompanied by a compliant Sustainability Appraisal (SA)</p> <p>SA does not measure up to NPPF requirements nor national policy</p> <p>Essential documents are missing from the Council's evidence base</p> <p>Assessments based on little/no supporting evidence. Not based on current actual systematic assessment of the ecology and natural environmental assets in the Green Corridor</p> <p>Subjective conclusions to the SA</p> <p>No assessment of environmental impacts and risks of the actual proposed developments</p> <p>A number of significant negative impacts in the SA which are then glossed over</p> <p>Conflicting statements on issues: leisure, spatial objectives, protecting local villages, introduction of a new village.</p>	<ul style="list-style-type: none"> • Community involvement, details of development, infrastructure plans to be provided • Revise the targets using reviewed evidence • More accurately reflect the character and nature of development around Welwyn (new town) and Hatfield (new town) • Create a less selective and biased picture of population and housing growth • Rebase housing needs to reflect what can be delivered in a sustainable manner 	<p>The Sustainability Appraisal was undertaken by LUC, an independent firm of consultants experienced in SA. The SA was undertaken in accordance with the SEA Regulations and National Planning Practice Guidance.</p> <p>The SA has been informed by a comprehensive and proportionate evidence base. No change</p>
257, 503, 559, 658, 806, 860, 870, 885, 900, 907,	<p>Does not meet NPPF sustainability criteria</p> <p>NPPF Para 165: Planning policies and decisions should be based on up-to-date information about the natural environment</p>	<ul style="list-style-type: none"> • Make proper assessments of all sites • Apply the same evidence rigorously 	<p>These are mainly matters for the soundness of the Local Plan.</p> <p>The SA is a suitable assessment of the sustainability of the Council's</p>

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<p>983, 1022, 1267, 1590, 2059</p>	<p>Fails to apply NPPF Para 7 to meet the three dimensions of sustainability (Social, Economic, Environmental) consistently: smaller sites are well-thought through, larger strategic sites have insufficient detail about infrastructure provision, master-planning and sustainability assessments thus missing the cumulative effect on e.g. WGC</p> <p>The proposal for a new village is not sustainable</p> <p>The arguments are largely unchanged from the last iteration of the Panshanger sustainability assessment, despite residents pointing out errors previously.</p> <p>The previous Inspectors report (2004) stated that Panshanger should not be retained as an ASR</p> <p>Site SDS6 is isolated from all surrounding urban areas, and currently has very little or no provision of water and sewerage, surface water drainage, electricity and gas or telecommunications services</p> <p>The plan adversely impacts on sustainable services for Northaw and Cuffley</p> <p>WHBC has not provided a definitive Infrastructure Delivery Plan noting that this "in part at least needs to be taken on trust".</p> <p>Large-scale developments like Panshanger are likely to produce social problems and an unsustainable community</p>	<ul style="list-style-type: none"> • Review the sustainability assessment for Panshanger • Remove the development at Panshanger and re-instate the airfield • Reduce the impact on the local existing population, environment and facilities • The plan should specifically address whether it can absorb an increased population • Remove Symondshyde (SDS6) "local village" from all parts of the plan • Delete Policy SP24 and associated references • Engage with NHDC as to possible alternative development opportunities • Without the necessary infrastructure the proposed additional housing will not be sustainable. • A better planning focus on building communities people want to live in, and which are therefore sustainable, should be the priority. • Remove Policy SP22 from the Local Plan 	<p>proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance. No change</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
1094, 1100, 1101, 1103, 1113, 1114, 1115, 1116, 1117, 1118, 1266, 1267, 1274, 1282, 1406	<p>The Sustainability Appraisal (SA) has not been prepared in accordance with regulations</p> <p>SA does not consider any reasonable alternatives to the allocation at Marshmoor in Welham Green, e.g. Roehyde</p> <p>The SA is not compliant because sites have not been assessed in a consistent manner.</p>	<ul style="list-style-type: none"> The site-based assessments within the sustainability appraisal should be reviewed for consistency on material weight for their contribution to objectively assessed needs. i.e. Symondshyde v. School Lane sites. 	<p>Roehyde was not considered to be a reasonable alternative as the HELAA did not find it suitable and its availability and achievability is uncertain.</p> <p>Sites that were considered to be reasonable alternatives have been assessed in the SA (Annex 1). Scoring of the sites is consistent with the SA assumptions in Appendix 2.</p> <p>No change</p>
4, 14, 17, 26, 106, 175, 197, 199, 337, 342, 438, 486, 503, 525, 559, 658, 670, 682, 684, 685, 720, 866, 870, 904, 905, 907, 908, 920, 1023, 1086, 1216, 1267, 1274, 1282, 1406,	<p>Size and location of proposed developments is not sustainable</p> <p>NPPF Paras 82-85 Risk of coalescence with Hatfield; insufficient separation from HAT1; separation between St Albans, Hatfield and Wheathampstead should be maintained.</p> <p>BrP4 (HS22) failed to be assessed as suitable for development in the 2014 SHLAA update.</p> <p>Joint and cumulative effects fail to be considered together.</p> <p>Placing so much weight on this new settlement without releasing sufficient sites in the Excluded Villages, particularly in the early part of the plan period is unsustainable.</p>	<ul style="list-style-type: none"> Reduce the Housing Needs Assessment Reduce the number of houses proposed by 2/3rds to keep the area distinct and separate from the surrounding countryside Brownfield or urban sites should be considered above this site No development on the Symondshyde Farm site is suitable. 	<p>These are mainly matters for the soundness of the Local Plan.</p> <p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance. No change</p> <p>The sites at Stanborough Farm and Birchwood Leisure Centre were not submitted to the Council in time to be assessed by the HELAA (2016)</p>

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1580, 1582, 1583, 1597, 1692, 1733, 1743, 1759, 1858, 1864, 1998, 1999, 2001	<p>NPPF Para 173 Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. With only one community shop and pub, Symondshyde will remain an 'out of the way' location, which even with the new roads proposed are unlikely to attract the critical mass of customers needed to be viable.</p> <p>Site SD6 is isolated and was not considered in previous consultation.</p> <p>150 houses are not needed or justified in a small village like Woolmer Green, 40 to 50 is maximum.</p> <p>Sites at Welwyn and Woolmer Green were in the SA, but not in the plan.</p> <p>Failed to allocate sites in Brookmans Park which are suitable, available, deliverable and sustainable.</p> <p>Building 6350 in and around town in addition to the 2780 houses to be built on Green Belt land to the north-west of Hatfield will increase the area's population by over 50%.</p> <p>Significant environmental effects of implementing the Local Plan on the Little Heath area</p> <p>Fails to address in detail issues arising from Policy SP24</p> <p>Fails to consider Roehyde as an alternative to Mashmoor for an employment site</p> <p>Does not appraise a reasonable alternative, the land adjacent to Birchwood Leisure Centre with replacement playing pitches provided at Stanborough Farm</p> <p>.</p>	<ul style="list-style-type: none"> • Remove SP24 from the plan • Restore the Dixons Hill Road site which has fewer access problems, • Remove BrP4(HS22) from the draft plan as a site allocation • Eliminate BrP4(HS22) and include BrP1, BrP6, BrP9, BrP10, BrP13 and BrP14(in Policy SADM 31) as these sites are available, deliverable and sustainable and will meet the planning criteria of increasing local economic viability and vitality, social cohesion, environmental soundness and satisfy the objectively assessed need. • Removed SDS6 from the local plan and all associated references • Delete the figure of 1,130 units or whatever figure has been attributed to location SDS6 (Symondshyde) from Table 2: Distribution of housing growth. • Develop the Entech site with 40-50 dwellings as it 	<p>so have therefore not been considered as reasonable alternatives in the SA. No change</p>

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		<p>would not affect residents in Woolmer Green: garage site could become available in 5 to 10 years</p> <ul style="list-style-type: none"> • Remove SP18 from the Local Plan. • Reduce the number of houses proposed for HAT1. • Consider alternative sites north of Stevenage. • HS22 should be removed from Policy SADM 31 as a site allocation. • New garden city in North Hertfordshire should be considered. • a Garden City in a sensible location is a better solution than bolt-on unsuitable sites in Green Belt areas to the edge of villages with already strained infrastructure demands • Exclude sites HS24 and HS25 from the Local Plan • Spread the housing fairly across the borough • Include land adjacent to Birchwood Leisure Centre in the SA/SEA • Reduce the number of houses on HAT1 	

DLPPS no.	Main Issue	Changes Sought	WHBC response
866, 960, 1026, 1274, 1406	<p>Failure to support the economic dimension of sustainable development</p> <p>NPPF Para 7 states that Local Plan's should contribute to building a strong responsive and competitive economy by ensuring that sufficient land of the right type is available...to support growth and innovation.</p> <p>The council have set unreasonably high growth targets for both employment and retail</p> <p>The airfield supported the local economy, and the local university's aeronautical courses benefit from the nearby facility.</p> <p>The economics of sustaining Entech, underutilised for many years, have not been looked into in preparing the plan.</p> <p>The analysis for SDS6 identifies "strong positive" scores in terms of proximity to employment and services for a site which is currently wholly isolated, although the landscape character.</p> <p>Does not appear to be a credible analysis.</p>	<ul style="list-style-type: none"> • Reduce the area for retail growth; develop a strategy for genuine retail redevelopment and then reduce the consequent impact on the Green Belt • Change the designation for EA10 in the plan to mixed use 	<p>These are mainly matters for the soundness of the Local Plan.</p> <p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance.</p> <p>A consistent methodology has been used to appraise all reasonable alternative sites. Appendix 2 of the SA sets out the assumptions used. No change</p>
14, 26, 35, 197, 682, 960	<p>Loss of amenity of recreational open space does not support sustainable development</p> <p>Loss of amenity and leisure opportunities for local people using land for walking, cycling, horse-riding.</p> <p>NPPF Para 123 The Council has failed to assess and report upon the distinct environmental value that this land has and failed to give this value sufficient weight in their assessment of it as a suitable site for housing development.</p>	<ul style="list-style-type: none"> • A compliant Sustainability Appraisal should be undertaken based on sufficient and adequate evidence of the effect on the treasured recreation and amenity value of the Symondshyde area 	<p>These are mainly matters for the soundness of the Local Plan.</p> <p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
	<p>People of all ages and walks of life have enjoyed this local amenity for over half a century.</p>		<p>set out in Planning Practice Guidance.</p> <p>A consistent methodology has been used to appraise all reasonable alternative sites. Appendix 2 of the SA sets out the assumptions used.</p> <p>The same evidence base has also been used to inform the assessment of all the reasonable alternative sites, irrespective of their size and location. This ensures consistency and objectivity.</p> <p>No change</p>
14, 586	<p>Failure to protect historic environment is unsustainable</p> <p>NPPF Para 126: Natural barrier between urban development and archaeological site is not taken account of at Wheathampstead</p> <p>Landscape character assessments should be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity. Panshanger Park provides an historic landscape, rich in wildlife and designed landscape.</p>	<ul style="list-style-type: none"> Remove SDS1 from the plan 	<p>A consistent methodology has been used to appraise all reasonable alternative sites. Appendix 2 of the SA sets out the assumptions used.</p> <p>Site SDS6 scores --? For criteria 4.5 historic environment/heritage assets. This is consistent with the SA assumptions at Appendix 2 of the SA report and reflects the presence of a listed building within the site. The site also contains an</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
			Area of Archaeological Search (AAS), which would result in a score of -? on its own. It is only AAS's in the site that effect the SA score. No change.
14, 95,106, 175, 197, 257, 337, 342, 371, 525, 627, 658, 677, 684, 866, 900, 915, 1075, 1335, 1348	<p>Failure to meet Green Belt policy is not sustainable</p> <p>NPPF Paras 79-92 No justification for exceptional circumstances for taking 140 acres of Green Belt; no clear demonstration that all other options, e.g. infill, brownfield site development, expansion adjacent to existing urban areas, have been exhausted</p> <p>BrP4 (HS22) breaches the guidelines for maintaining a strong and permanent Green Belt boundary.</p> <p>Cumulative impact of developments such as Brookmans Park and strategic sites on Green Belt are not being addressed</p> <p>The necessary exceptional circumstances for taking land out of the Green Belt, with particular reference to the SDS6 Symondshyde site, have not been demonstrated</p>	<ul style="list-style-type: none"> • Remove greenfield sites from land allocated to housing development; consider brownfield first • Remove HAT15 (SDS6) from the plan • Remove Policy 24 from the plan • Compliant Sustainability Appraisal needs to be undertaken based on sufficient and adequate evidence of the effect of 1130+ buildings,3,000+ people and 2,000+ vehicles on public safety, the already congested surrounding road infrastructure, pollution • Revise employment land and housing targets 	<p>These are mainly matters for the soundness of the Local Plan.</p> <p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance. No change</p>
17, 26, 106, 342, 525, 658, 670, 677, 682, 813, 900,	<p>Failure to address impact of/lack of infrastructure in the SA: transport, roads, cyclists and pedestrians; traffic and parking; water</p>	<ul style="list-style-type: none"> • Para 21.4 should be amended to state that no 	<p>These are mainly matters for the soundness of the Local Plan.</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
<p>904, 915, 941, 1267, 1335, 1340, 1342, 1348, 1574, 1576, 1582, 1597, 2042, 2043, 2047</p>	<p>NPPF Para 29-41 Roads and lanes too narrow to support traffic generated if the development is not designed for sustainable living, e.g., without a secondary school</p> <p>SA does not adequately examine the effect of Symondshyde Village's vehicular traffic on the surrounding area: congestion, public safety, pollution and carbon footprint of over 2,000 more vehicles</p> <p>Secondary school children will be driven to school because of needs for access to different types of schools, e.g. faith, exacerbating the current traffic problems, and teachers will drive in. Primary schools and nurseries will add further.</p> <p>Location of Symondshyde requires traffic across Coopers Green Lane, an already congested road.</p> <p>Little or no provision for cyclists and pedestrians. No footpaths or safe crossings on existing roads in the vicinity.</p> <p>BrP4 (HS22) will require major engineering works no details of which have been provided.</p> <p>Locating houses in this relatively isolated location will result in reliance on car usage and further increase parking pressures in St Albans, Hatfield, Welwyn Garden City and Harpenden town centres</p> <p>The speed at which emergency services can reach Cuffley will be materially impaired: traffic already jams with incidents on the M25</p> <p>Failure to provide evidence about the effect HS22 will have on pedestrians and heavy traffic access to the M25/A1 via Water End</p> <p>Already too much demand for water. DEFRA have said they intend to grant no further extraction licence.</p> <p>Very poor access near Dixons Hill railway bridge.</p>	<p>access off Bradmore Lane will be permitted as this will damage the rural nature of the lane, damage the setting of the Swallow Holes and materially damage the environment of Waterend.</p> <ul style="list-style-type: none"> • An assessment of all infrastructure and solutions to any issues arising from road capacity should be undertaken and finalised prior to consideration of the proposed development. • Remove HS22 (BrP4) from the list of sites • Increase number of schools, doctors' surgeries, not permit parking; speed bumps on Hawkshead Road and safer junction. 	<p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance. No change</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
<p>14, 17, 175, 337, 342, 525, 559, 670, 806, 989, 1335, 1340, 1342, 1574, 1576, 1582, 1597, 1733</p>	<p>Failure to meet sustainability criteria</p> <p>No pre-evidence provided, e.g. master plan for an SPD, for a proper assessment of what is to be built.</p> <p>Housing should be located close to existing services and amenities, to reduce pressure on infrastructure, services and amenities like transport, schools and water.</p> <p>Sustainable community amenities need to be planned into new developments.</p> <p>Provision of sustainable transport should be pre-planned.</p> <p>Schools need to be within easy access.</p> <p>Maintaining/reducing air quality/pollution.</p> <p>Risks to delivery associated with funding for the required infrastructure, impact on the existing community and the potential for delay to the delivery of new homes has not been assessed.</p> <p>Traffic and sustainable transport have not been addressed with an increased population in Cuffley and Northaw. The proposed development is more than walking distance from the facilities in Goff's Oak or Potters Bar and will result in an increase in car journeys, pollution and will be wholly reliant on the use of cars.</p> <p>One or two local shops and primary school will cause a great increase in traffic crossing and joining local roads, it will discourage walking and cycling by the nature of its location</p> <p>High levels of noise at site HS22 (BrP4) from the adjoining East coast trainline, in excess of 45 DB.</p> <p>The Council has failed to demonstrate any capacity constraint at Brookmans Park Primary School.</p>	<ul style="list-style-type: none"> • True involvement of the community, with clear indication of what to be built and what mineral extraction will happen • The proposed new settlement should be tested and fully informed by the evidence and the Sustainability Appraisal to provide a robust justification for the change in strategy for meeting housing needs and the choice of location • Take Symondshyde out of the local plan entirely, it is not a rational location given all the local and national planning policies. • Withdraw the Symondshyde site 	<p>These are mainly matters for the soundness of the Local Plan.</p> <p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance. No change</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
26	<p>Loss of agricultural land</p> <p>NPPF Para 28- Enterprise and diversification in rural areas.</p> <p>NPPF Para 112- Seeking poorer quality land in preference to higher.</p> <p>Loss of agricultural land at SDS6 is a concern.</p>		<p>This impact has been assessed in the SA No change</p>
682	<p>Failure to take account of Mineral Extraction and Geology</p> <p>The Council has not taken minerals considerations into account in deciding to allocate Symondshyde as a strategic housing site. The 2007 Minerals Local Plan lists land at Symondshyde Farm as part of Hatfield Quarry as Specific Sites for sand and gravel extraction. Both the geology of the area and the terrain are consistent with the potential formation of sink holes.</p>	<ul style="list-style-type: none"> Hertfordshire County Council's review of the Minerals Local Plan should be reviewed immediately to check on the Symondshyde site's will be included as a preferred site which would conflict with the proposed new village timescale. A quantitative assessment of the risk of sink hole formations as a result of the changes in groundwater regime that result from a development of the type envisaged is required, as preliminary investigations that Imperial College are currently doing 	<p>The impact on minerals resources has been assessed in the SA. Viable minerals have been extracted from this site. No change</p>
559, 941, 1335, 1340, 1342, 1347, 1348, 2059	<p>Risk of flooding, and adherence to SUDS</p> <p>DLP Para 6.42 states that "An uncertain effect is expected in relation to SA objective 4.8 (avoid water pollution).</p>	<ul style="list-style-type: none"> The proposed development at Birchall Garden Suburb (SDS 2) must be 	<p>These are not matters for the SA to address.</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
	<p>Additional development that will need to take place on greenfield land could lead to increased urban run-off and if not managed well, runs the risk of pollution to sensitive watercourses in the borough.</p> <p>It is not clear if SUDS requirements are being fully included and costed in the proposed developments in the Plan, especially Birchall Garden Suburb (WGC5)</p> <p>Northaw Road East is subject to regular flooding, and with run-off from a large development on the hill there will be increased water on the B156</p> <p>Failure to take account of the effect heavy flooding will have on Water End as it already is in danger zone 2,3a,3b zones</p> <p>Symondshyde is situated in a dip, with a potential for flooding. Much of the area is marsh. The problem of local flood defences will cause difficulties for Cromer Hyde, Lemsford and Stanborough</p> <p>Located in a Ground Water Protection zone –with negative impact on the Swallow Holes (SSSI)</p> <p>Swanley Bar/Hawkshead Road/Great North Road, constantly flooded in rainy weather</p>	<p>accompanied by a system of reed bed marshes down the Eastern arm of the Hatfield Hyde Brook to clean up the foul water exiting the former landfill site that is close to this proposed development.</p> <ul style="list-style-type: none"> • The Local Plan should include the development of reed beds at Stanborough Park and integrate them into developments proposed in the Local Plan e.g., at Symondshyde (SDS6 – HAT 15) and North West Hatfield (SDS5 - Hat 1). • Restore the Dixons Hill Road site with no drainage or flooding problems • Drains in roads need to be cleaned regularly (Hawkshead Road) 	<p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance. No change</p>
559, 677, 682, 936	<p>Failure to assess or plan mitigation of impact of development on Green Corridors</p> <p>NPPF Para 114 Set out a strategic approach, planning positively for networks of biodiversity and green infrastructure.</p>	<ul style="list-style-type: none"> • Assess joint and cumulative effect before development decisions are made • Work with East Herts to address cross-boundary 	<p>The SA is a suitable assessment of the sustainability of the Council's proposals and follows the Sustainability Appraisal guidance set out in Planning Practice Guidance. The Council has</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
	<p>NPPF Para 117 Minimise impacts on biodiversity and geodiversity, by planning for biodiversity at a landscape-scale across local authority boundaries</p> <p>Reliance on Landscape Character Assessments carried out by Hertfordshire County Council (Symondshyde Ridge Area 32) over ten years ago is inadequate and no evidence of input into an up to date and objective assessment of the ecological or amenity value of this area. No plan for biodiversity at a landscape scale across local authority boundaries applied to SP19.</p> <p>Not based on current actual systematic assessment of the ecology and natural environmental assets in the Green Corridor. No strategic ecological assessment of the existing Green Corridor. No identification and mapping of local ecological networks</p> <p>Destruction of the natural environment and ecology of the area(so called "Green Corridor"), including the ancient woods of Titnol's, Chalkdell, Symondshyde Great and Furze Field woods, all affected by vehicles using Symondshyde Lane</p> <p>Destruction of wildlife, including resident herd of deer</p>	<p>impacts on Green Corridors</p> <ul style="list-style-type: none"> • A compliant Sustainability Appraisal should be undertaken based on sufficient and adequate evidence of the effect on the fragile local ecology and wildlife • SP24 should be withdrawn from the plan • Remove SP19 from the Local Plan or change it so that the Green Corridor is maintained. 	<p>produced a Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended).</p> <p>The HRA has informed the SA conclusions in relation to the impact of the Plan on the European and Ramsar sites. Other biodiversity interests have been considered by the SA. The approach is described in Appendix 2, which sets out the assumptions used. (SA objective 4.6) No change</p>
<p>4, 14, 26, 503, 525, 559, 586, 658, 682, 915, 960, 1022, 1267 205, 2060, 2064</p>	<p>Other concerns relating to habitats and environmental designations</p> <p>NPPF Para 8 Dimensions of sustainability should not be undertaken in isolation</p> <p>NPPF Paras 79-92 Green Belt including transport infrastructure</p> <p>NPPF Paras 109-125 Close proximity to woodland (e.g. Symondshyde) will damage wildlife</p>	<ul style="list-style-type: none"> • Sustainability assessments should reflect the scale of the site and not just based on the nearest part of it • Include proper environmental, habitat and biodiversity assessments Include assessments of specific sites: BrP4(HS22) 	<p>The HRA has informed the SA conclusions in relation to the impact of the Plan on the European and Ramsar sites. Other biodiversity interests have been considered by the SA. The approach is described in Appendix 2, which sets out the assumptions used. (SA objective 4.6)</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
	<p>NPPF Para 113 criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.</p> <p>NPPF Paras 128-129 Identifying and protecting Historic Environment, including the setting of a heritage asset</p> <p>NPPF Para 165: Planning policies and decisions should be based on up-to-date information about the natural environment</p> <p>For Panshanger, habitat and biodiversity surveys for the strategic sites have not been conducted and the greenbelt and Landscape analyses gloss over the sheer scale of development at each site and the cumulative effect around WGC.</p> <p>Effect on Local Topography and SSSI. The site overlooks the Mimram Valley, which includes an area at Tewinbury Farm designated by the Herts and Middlesex Wildlife Trust as a Site of Special Scientific Interest, and is near Panshanger Park, an historic country park. The Mimram is one of the country's rare chalk streams and provides a very specific environment</p> <p>BrP4(HS22) is detrimental to the ecology of the immediate area and threatens the setting of the Swallow Holes a unique SSI</p> <p>Failure to acknowledge Waterend as a settlement interferes with its application for Conservation status</p> <p>No assessment of the existing ecosystem in Symondshyde Ridge/Symondshyde Wood area and no up to date audit of plant, insect and animal ecology.</p> <p>Destruction of Ancient Woodland because of roads being constructed</p>		<p>It is agreed that mitigation may help to address the effects identified (e.g. with respect to landscape and biodiversity) and these are listed in the final column of the appraisal matrix, against the effects identified. No change</p>

DLPPS no.	Main Issue	Changes Sought	WHBC response
	Panshanger provides an excellent habitat for wildlife, especially ground nesting birds. Birds return here year after year to nest as the land hasn't been farmed in more than half a century. Owls are frequent hunters over the site.		

Full list of dlpps numbers commenting on *'Not accompanied by a compliant Sustainability Appraisal (SA)'*: 4, 14, 17, 26, 35, 95, 106, 175, 197, 257, 337, 342, 371, 438, 486, 503, 516, 525, 559, 586, 627, 658, 670, 677, 682, 683, 684, 685, 720, 806, 813, 851, 860, 866, 870, 885, 900, 904, 905, 907, 908, 911, 915, 920, 936, 941, 960, 983, 989, 1021, 1022, 1023, 1026, 1063, 1075, 1084, 1086, 1094, 1099, 1100, 1101, 1103, 1113, 1114, 1115, 1116, 1117, 1118, 1216, 1266, 1267, 1274, 1282, 1335, 1340, 1342, 1347, 1348, 1406, 1574, 1576, 1580, 1582, 1583, 1590, 1597, 1692, 1733, 1743, 1759, 1858, 1864, 1997, 1998, 1999, 2001, 2042, 2043, 2047, 2059, 2060, 2064

Comments specifically on the content of the Sustainability Appraisal

PSSA no.	Main Issue	Changes Sought	WHBC response
15, 20 31, 32	<p>The Sustainability Appraisal (SA) has not considered all the reasonable alternatives to meet the full OAN</p> <p>The SA failed to properly assess the impact of, or justify the exclusion of all the sites identified as reasonable alternatives (particularly sites Wel1/2/15, WGr2/3 & OMH7), even though these could meet the shortfall in the OAN and ensure higher levels of housing are delivered throughout the plan period</p> <p>All the reasonable alternatives for planning for higher levels of OAHN should have been assessed, including meeting the unmet needs of London and St Albans.</p>	<p>Update/prepare a legally compliant SA Report, ensuring it contains all the information required by Annex I of the SEA Directive</p> <p>Justify the exclusion of other sites (.i.e.Wel1/2/15, WGr2/3 & OMH7). Assess higher and lower levels of growth</p> <p>The SA Report needs to contain information about the alternatives considered in all previous stages of the process, including why the alternatives were selected and why the preferred options were chosen.</p>	<p>WGr2/3, OMH7, Wel1/2/15 are assessed as reasonable alternatives (refer to Annex 1).</p> <p>The Housing Sites Selection Background paper (2016) sets out how sites have been considered in a balanced way and selected. The SA formed part of the approach to Site Selection.</p> <p>The SA Report summarises the reasons for site selection on a settlement basis followed, by rural areas. Appendix 5 provides the statement of reasons for the inclusion or exclusion of sites. No change</p> <p>A range of growth options was appraised ranging from 2,925 to 14,000 (How Many Homes Consultation, see SA Report p.38-39) The SA of Policy SP2 noted that the target is around 500 homes below the lower end of the OAN range, a mixed significant positive and minor negative effect is identified, with uncertainty also attached to achieving</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>The SA (.i.e. para 6.5) needs to explain all the reasonable alternative sites that were considered/discounted and assess them at the same level as the preferred sites, rather than refer to other documents that were not either available or consulted on. It is unclear why the preferred level of housing and the particular selection of sites have been chosen, even though their delivery is uncertain</p> <p>Clarification required in relation why site allocations at villages (. i.e. along the railway lines) to the south of Hatfield are not accommodating higher levels of growth, than other locations that have a lower SA score (Para 6.462)</p>	<p>The SA Report needs to contain information about the alternatives considered in all previous stages of the process, including why the alternatives were selected and why the preferred options were chosen</p> <p>Reassess the methodology of the SA and how it is used to determine the most sustainable locations for development.</p>	<p>the required build rates. The reasons for the choice of housing target are provided at p.40-41 of the SA Report.</p> <p>St Albans has not notified WHBC that it has an unmet need. No London borough has requested WH to meet any unmet needs. No change</p> <p>The Housing Sites Selection Background paper (2016) sets out how sites have been considered in a balanced way and selected. The SA formed part of the approach to Site Selection. This document was taken to committee in June 2016 and has been subsequently available on the website.</p> <p>The SA Report summarises the reasons for site selection on a settlement basis, followed by rural areas. Appendix 5 provides the statement of reasons for the inclusion or exclusion of sites. No change</p> <p>The Council has chosen where to allocate sites, informed by the SA amongst other considerations. Growth has been distributed where the most suitable sites are located in the most sustainable locations and in light of infrastructure constraints. No change</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
15, 24, 26	<p data-bbox="387 261 1016 323">The reasonable alternatives to new village at Symondshyde have not been assessed</p> <p data-bbox="387 379 1016 579">The SA (para 6.405) has acknowledged that the reasonable alternatives (including HAT 2) to Symondshyde have not been considered, even though this site would be reliant on Hatfield for employment and services/facilities. This is against Part 3 of Regulation 12.</p> <p data-bbox="387 1098 1016 1362">New village at Symondshyde is not sustainable because it will increase the use of commercial/ domestic vehicles and increase congestion. Also it is against the Local Plan objectives (.i.e. 1, 2 and 6) that seek to maintain existing settlement patterns, limit development to excluded villages and encourage sustainable modes of travel.</p>	<p data-bbox="1028 387 1525 450">Assess Hat2 as a reasonable alternative to Symondshyde.</p> <p data-bbox="1028 1098 1525 1225">All facets of sustainability should be assessed by an independent consultant for the new village at Symondshyde.</p>	<p data-bbox="1536 387 2074 515">Hat2 is assessed in the SA as a reasonable alternative – see pages 328 to 329 of Annex 1, and para. 6.327 and Table 6.16 in the SA Report.</p> <p data-bbox="1536 563 2074 1026"><i>The SA addresses the issue of reasonable alternatives at para. 6,405, pointing out that while “No reasonable alternative sites for a new village were identified by WHBC for the purposes of SA. However, the other reasonable alternative sites within or adjacent to Welwyn Garden City, Hatfield and the named villages could all be considered to be reasonable alternatives in their own right. The likely effects of developing these reasonable alternatives are reported earlier in Chapter 6 of this SA Report.”</i></p> <p data-bbox="1536 1034 2074 1066">No change</p> <p data-bbox="1536 1106 2074 1265">The SA has considered social, economic and environmental aspects of sustainability (see assumptions at Appendix 2, and detailed assessment at Annex 1, p.534).</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>The proposed new settlement at Symondshyde is a major departure from the previous strategy that was focusing new housing development at Welwyn and Hatfield, and the excluded villages. The social implications of proposing a higher level of growth at Symondshyde need to be considered. This will deliver 30% affordable housing, against a previous strategy that was seeking to deliver 35% affordable housing within the excluded village (.i.e. a reduction in 56 units)/other locations. Hence, extensions to alternative villages within the hierarchy should have been assessed, particularly for the early years of the Plan.</p>	<p>Undertake an SA of the alternatives for the development strategy to :</p> <ul style="list-style-type: none"> ➤ Ensure the full spatial extents of the significant effects is understood through joint working ➤ Take account of the significant transport, etc. infrastructure that is required for the new settlement and understand the risks for securing funding and delivery of them ➤ Take account of; and respond to; the findings of the SA in relation to all the facets of sustainable development ➤ Assess higher and lower levels of growth 	<p>The issues raised in relation to the objectives relate to the Local Plan. No change</p> <p>WHBC consider that development of Symonshyde is not a reasonable alternative to development at the villages. As outlined in the Housing Site Selection Paper (2016) options at the villages have been fully explored. The additional development at Symondshye, to bring the housing target closer to the borough's objectively assessed need, has not lowered the level of development at the villages.</p> <p>Development of Symondshyde is in addition to development at the villages, so it will have a positive impact as it will increase affordable housing provision in the borough. No change</p>
15, 28	<p>The reasonable alternatives to the employment allocation at Marshmoor site should have been considered</p> <p>The Roehyde site should have been considered as a reasonable alternative to the Marshmoor site because this it is more accessible for workers from Hatfield and Welwyn Garden, than the proposed allocation and in line with Local Plan objective 12.</p>	<p>Consider Roehyde (Hatfield) as a reasonable alternative site to the proposed employment allocation at Marshmoor</p>	<p>The SA has appraised a wide range of alternatives, in terms of both spatial locations and levels of growth, over the period of plan preparation. These have included a number of urban extensions to Welwyn Garden City and Hatfield, extensions to a number of villages in the Borough, and the provision of a new settlement, as can be seen in Figures 5.2 and 5.3 of the SA Report.</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
			<p>The Roehyde site was not considered suitable, with uncertain achievability, in the Housing and Economic Land Availability Assessment (HELAA), 2016, and was not considered to be a reasonable alternative.</p> <p>The main centres of economic activity are WGC and Hatfield. This does not mean that economic activity cannot take place elsewhere and the allocation of additional employment land at Welham Green does not undermine the strategy.</p> <p>The Roehyde site is a highly car dependant location, being sited off the A414 and separated from Hatfield and WGC by the A1(M). The Marshmoor site is within walking distance of a railway station and is not car dependent. No change.</p>

	<p>Needs to assess the social impacts (.i.e. affordable housing, demographics) of delivering 80 dwellings on the Marshmoor site, instead of 288 dwelling that were previously proposed on a number of sites to address the OAHN of 360 dwellings identified for Welham Green</p> <p>WeG3a is equal to/more sustainable than the proposed allocated site (WeG4a) at Marshmoor because Weg4a incorrectly received a positive/neutral score against objectives 4.4 and 4.5 (.i.e. landscape and historic assets), even though Historic England raised significant reservations about Hatfield House. Also the potential health impacts of Weg4A proximity to a railway line and a major road need to be considered.</p>	<p>Assess the impact of delivering 80 dwellings at Welham Green instead of 288.</p> <p>Assess higher and lower levels of growth</p> <p>Undertake an SA of the alternatives for the development strategy to: ensure the full spatial extents of the significant effects is understood. Also take account of and respond to the findings of the SA in relation to all the facets of sustainable development</p> <p>Consider potential health impacts for future residents at WeG4a due to proximity to railway line/main road reassess this against objectives 4.4/4.5.</p>	<p>With respect to Marshmoor and Welham Green, a large number of sites have been subject to SA as can be seen in the SA Report dated December 2014 of the Local Plan Consultation Document, which fed into the Proposed Submission Local Plan. The SA has also assessed various distribution strategies for the whole borough. No change</p> <p>The Landscape character score reflects the findings of the Landscape Capacity Study, and the site being partly previously developed land (criteria 4.4). The SA recognises the proximity and potential for impacts on the setting of Hatfield House Registered Park & Garden, identifying a potential significant negative effect with uncertainty in relation to historic assets. The minor positive element recognises the opportunities which may come with development to improve the setting, This reflects Historic England's comments.</p> <p>SA objective 1 considers health, and sites are appraised by proximity to (or potential to provide) key services/ facilities/assets (see Appendix 2). No change</p>
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PSSA no.	Main Issue	Changes Sought	WHBC response
15, 31, 32	<p data-bbox="394 258 1005 355">The alternatives options to phasing housing delivering (via SP2) should have been considered</p> <p data-bbox="394 403 1005 770">The SA needs to assess economic and social implications of policy SP2 that is seeking to phase housing delivery (i.e. 498 dpa to 2020 and 752 dpa to 2032), against an average flat rate of housing delivery throughout the plan period. This is contrary to the SHMA that indicated 755 DPA are required until 2020 and 589 DPA after this. Hence, more medium and small sized sites (e.g. WeG3) need to be considered, to deliver a sustainable/flexible strategy.</p>	<p data-bbox="1034 403 1514 531">Update/prepare a legally compliant SA Report, ensuring that it contains all the information required by Annex I of the SEA Directive</p> <p data-bbox="1034 579 1473 643">Assess higher and lower levels of growth</p> <p data-bbox="1034 683 1514 1038">Undertake an SA of the alternatives for the development strategy to : ➤ Ensure the full spatial extents of the significant effects is understood through joint working ➤ Take account of the significant transport, etc. infrastructure that is required for the new settlement and understand the risks for securing funding and the delivery of them</p>	<p data-bbox="1543 403 2063 930">The appraisal of Policy SP2 recognised that the housing provision is around 500 homes below the lower end of the OAN range. Therefore a mixed significant positive and minor negative effect is identified, with uncertainty also attached to achieving the required build rates given they are so much higher than has been achieved over recent years. The latest AMR (January 2017) shows that the 10 year average in delivery is 352dpa (net). Therefore, given the short timeline until 2020, it is unrealistic to expect such a dramatic step change in housing delivery as identified in the SHMA. No change</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
8, 11, 14, 16, 20, 25, 31	<p>Concern with SA Methodology</p> <p>The assessment of larger sites (.e.g. WGC4) is distorted because it measures the distance from the nearest part of a site, to the local facilities and employment sites (.i.e. objectives 4.2 and 4.3), even though a small part of it may be located within the sustainable distance.</p> <p>The Panshanger Matrix is largely unchanged and the errors previously noted have not been addressed</p> <p>The SA does not identify links between the Local Plan and other plans, programmes and policies such as the Council's housing strategy or LEP plans.</p> <p>The methodology fails to enable the reader to understand how the assessment was undertaken</p>	<p>Reassess the SA methodology and how it is used to determine the most sustainable locations for development</p> <p>Review the sustainability appraisal for this site which is much less sustainable than reported</p> <p>Update/prepare a legally compliant SA Report, ensuring it contains all the information required by Annex I of the SEA Directive. This will need to include information of all the alternatives/options considered and why they were selected/preferred, throughout the different stages of the process</p> <p>Make the SA report more accessible for the public to read.</p>	<p>The approach to distance measurement is consistent with SAs of other Local Plans which have been found sound. At the strategic level it provides an appropriate indicator of distance. The SA method also takes account of future neighbourhood centres within strategic allocations if these are required by a local plan policy (criteria 1.1, Appendix 2.). No change</p> <p>The response to previously raised issues is provided at Appendix 1 to the SA Report (see p.47-48 for example). The SA assessment is consistent with Assumptions (see Appendix 2). No change</p> <p>The review of policies, plans and programmes and baseline information is described on page 8 of the SA Report and at Appendices 3 and 4. No change</p> <p>The methodology is described in the SA Report at Chapter 2. The SA Framework is set out in Chapter 4 and</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>Site WGC5 partly falls within the neighbouring area of E Herts and its potential effects should not be assessed separately in two SA's. The joint and cumulative impacts of it should be considered in the Welwyn Hatfield SA.</p> <p>Mitigation measure identified are inadequate to address impact</p>	<p>Base the SA on clear evidence.</p> <p>Set out clearly the requirements being stipulated for each proposed development and the cumulative effects of WGC5 in the two authorities are considered by the SA</p> <p>Ensure mitigation measures are implemented and included in the cost of development.</p>	<p>the assumptions used to carry out the appraisal are provided in Appendix 2.</p> <p>A shorter Non-Technical Summary was provided as part of the consultation. We recognise the SA Report is long, but it is written in plain English, as far as possible for a technical document.</p> <p>No change</p> <p>The SA is a neutral evidence based assessment, drawing on published baseline information (see Appendix 2 and Appendix 4). Para. 6.219 addresses the issue of cumulative effects. No change</p>
12, 14, 21, 23, 24, 25, 28	<p>Concern about the potential environmental effects of the Plan and the evidence to inform the assessment</p> <p>The SA contains no information about the current state of the environment or its likely evolution without the Plan.</p>	<p>Update/prepare a legally compliant SA Report, ensuring it contains all the information required by Annex I of the SEA Directive</p>	<p>The review of policies, plans and programmes and baseline information is described on page 8 of the SA Report and at Appendices 3 and 4.</p> <p>Cumulative effects are addressed within the SA Report at Chapter 6, pages 169 to 177.</p> <p>No change</p>

	<p>The SA is not based on any systematic assessment of the ecology and natural environmental assets, their potential linkages and their ecosystems services benefits, nor how the plan's proposals could affect them.</p> <p>The SA must consider the environmental impacts of implementing the proposals of the emerging Local Plan against the reasonable alternatives, taking into account the Plan's objectives and geographic scope.</p>	<p>Provide a systematic assessment of the ecology and natural environmental assets, their potential strategic linkages and their ecosystems services benefits of the proposed developments in the plan</p> <p>None stated</p>	<p>The assumptions at Appendix 2 to the SA Report set out how impacts on biodiversity are considered through the SA (see criteria 4.6), both in relation to designated sites, and other greenfield land (see also 4.8 re. water pollution and 4.10 for brownfield land). Criteria 4.4 addresses open space and landscape features which may also provide habitats, and links. The SA identifies potential significant negative effects of Site WGC5, e.g. in relation to biodiversity (para. 6.225). While the SA criteria do not refer specifically to ecosystem services, these are implicit within the references to open space, flood risk, landscape, agricultural land etc. – it is clear that sites may perform many functions. No Change</p> <p>The SA has appraised a wide range of alternatives, in terms of both spatial locations and levels of growth, over the period of plan preparation. These have included a number of urban extensions to Welwyn Garden City and Hatfield, extensions to a number of villages in the Borough, and the provision of a new settlement, as can be seen in Figures 5.2 and 5.3 of the SA Report. No change</p>
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PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>SA needs to acknowledge that WGC4 is a rare unimproved grassland that contains several species of bats, other mammals and endangered birds present on it. No Biodiversity Impact Assessment has been taken to identify, enhance or protect these assets.</p> <p>Criticism raised that the SA assumes that the measures included in the policies will minimise/mitigate any minor/significant negative impacts of potential development.</p>	<p>Undertake a biodiversity assessment of protected species and habitats, in line with Natural England's advice. This will enable the site (WGC4) to be reviewed.</p> <p>Ensure that the mitigation measures are actually implemented and included in the costs of proposed</p>	<p>Natural England's comments in 2015 relate to the need to provide a Habitats Regulations Assessment, which has been done. Our response to Natural England's Aug 2014 comments is provided at Appendix 1. The SA considers distance to designated sites, and ancient woodland, and for non-designated sites recognises that there may be impacts on biodiversity (see Appendix 2). These impacts may relate to protected species. The appraisal identifies site WGC4 as having the potential for significant negative effects (with uncertainty) with respect to biodiversity due to its proximity to the nearby Tewinbury SSSI and adjacent Ancient Woodland. The SA points to the mitigation required by local plan policies, to protect and conserve biodiversity. Protected species surveys are required to accompany planning applications.</p> <p>Natural England has not raised any concerns with the SA of the Proposed Submission Local Plan</p> <p>The SA is required to assess the likely effects of the local plan's policies and proposals. It identifies the likely significant effects before mitigation is taken into account, and identifies</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>No monitoring measures have been included to enable adverse effects to be identified.</p> <p>SA fails to set out substantively the scale, nature and significance of the negative impacts. Its proposed mitigation measures are not clearly adequate and there could be significant residual negative impacts, which it fails to set out.</p> <p>Assessment for HS24 (Brp7) has failed to adequately consider flood risk, wildlife, views and Green Belt loss.</p>	<p>development before determining their viability.</p> <p>Base the SA on clear evidence.</p> <p>Base the SA on the actual impacts of the plan – not on just the Plan’s policies and ‘intentions’.</p> <p>Set out clearly the requirements being stipulated for each proposed development.</p> <p>Apply SP11’s mitigation hierarchy in the correct sequence laid down in determining these requirements.</p>	<p>policies which will help to minimise negative effects. The details of any mitigation measures and their implementation are provided in local plan policies. No change</p> <p>Monitoring is addressed at Chapter 7 of the SA Report. No change</p> <p>The SA is required to assess the likely effects of the local plan’s policies and proposals. It identifies the likely significant effects before mitigation is taken into account, and identifies policies which will help to minimise negative effects. The details of any mitigation measures and their implementation are provided in local plan policies. No change</p> <p>The assessment of BrP7 is comprehensive and is set out in Annex 1. It is consistent with the assumptions set out in appendix 2. No change.</p>
8, 10, 16, 19	<p>Consultation was ineffective because the complexity of the SA prevented people from responding.</p> <p>Concern that the SA documents are lengthy and complex. This has prevented members of public to understand the findings of it and comment on them (SA obj 3.1)</p>	<p>Engage properly with local residents to ensure a reasonable proportion of residents do respond.</p> <p>Create a simpler document.</p>	<p>The Council has engaged with the public in accordance with its SCI. Site promoters of strategic sites have also carried out community events.</p> <p>The SA reports are long but this reflects the thorough nature of the appraisal process. A shorter non-technical summary was included in the consultation. No change</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
7	<p>Criticism of the assessment of Site Cuf5</p> <p>The SA scoring for CuF5 are incorrect because it has failed to consider the benefits (.i.e. CO2 emissions, climate change) of its proximity to the Anaerobic digestion plant. Also it is unlikely to have a major impact on biodiversity or visual impact and plays a limited role for the Green Belt. Cuf5 is considered a zero carbon development and is located within an accessible location and will include on site facilities (e.g. GP, school). Hence, the reasons for excluding this site are weak.</p>	<p>Site CuF5 should have a higher score, when it is reasonably assessed against the SA objectives</p>	<p>The scoring is consistent with the SA Assumptions at Appendix 2 of the SA report. The comment in relation to the proximity to the anaerobic digestion plant has been addressed previously (see Appendix 1). Green Belt comments relate to the Green Belt review. No change</p>
23	<p>Concern about assessment of Site HS24 (Brp7)</p> <p>The SA needs to give more importance to flood risk, loss of wildlife, Green Belt and vistas for HS24</p>	<p>None Stated</p>	<p>The SA criteria and assumptions are set out at Appendix 2 of the SA Report. Flood risk is addressed through SA criteria 2.2, Biodiversity is addressed by criteria 4.6. Vistas are addressed by criteria 4.4 & 4.5. Criteria 4.4 (d) uses the results of the Green Belt review to appraise whether development of sites would retain the existing settlement pattern. No change</p>
8, 9, 13,16 17, 18, 22, 27	<p>Concern about assessment of Site WGC4 (SDS1)</p> <p>Scoring is inconsistent</p> <p>The assessment of site WGC4 against objective 4.4 (landscape character) should</p>	<p>Review the appraisal of this site, which is less sustainable than reported</p>	<p>The scoring complies with the assumptions as set out in Appendix 2.</p> <p>The SA was undertaken with reference to the Landscape Study as set out in Appendix 2. It is noted that the hangars have been removed subsequent to the Landscape Study. However, WHBC</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>note that the removal of the hangers has increased the negative impact on the landscape character of the area.</p>		<p>consider that the views of the hangars were limited by trees, so therefore their removal has not substantially enhanced the landscape value of the site. No change</p>
	<p>WGC4 against objective 4.4 should not categorise all of the site as previously developed land because only parts of it consisted of buildings and it has no hard runaways.</p> <p>The proposal for 650 dwellings on site WGC4 is unsustainable because it is located further away from local facilities/services. It will increase commuting by private vehicles, congestion and pollution.</p>	<p>Reassess site WGC4 against SA objective 4.4</p> <p>Remove the proposals for site WGC4 and allow it to be used as an airfield.</p>	<p>While the site was originally identified by WHBC as previously developed land, it is agreed that it should be defined as 'partly PDL' (and this is the approach used in the HELAA). This would change the SA score for 4.4(c) to +? in line with the SA Assumptions at Appendix 2. Minor modification proposed to define the site as partly pdl instead of all pdl.</p> <p>The appraisal of this site is set out in Annex 1 of the SA report. Assessments are positive with regards to proximity to services and facilities and takes account of the allocation of a convenience shop on the site by Local policy SP18. The Council has concluded that the significant positives outweigh the significant negatives.</p> <p>SP18 also allows for the opportunity for a realigned runway through the Masterplan for this site. No change</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>The assessment of site WGC4 against Objective 6.6 needs to emphasis the negative impacts of the loss of the airfield, such as the loss of the potential to create links with educational institutions and to train engineers/pilots.</p> <p>Criticise the ++ point scoring for policy SDS1 against objective 6.6 because a new primary school will be required.</p> <p>The cumulative effects of these adjustments to the SA scoring for SDS1 shows that it is less sustainable than reported.</p> <p>Site should be retained as an airfield because it has less impact than a housing development. Suitability of site for air sports should be investigated before the Local Plan is finalised.</p>	<p>Review the sustainability appraisal for this site which is much less sustainable than reported</p> <p>Review the sustainability appraisal for this site which is much less sustainable than reported</p> <p>Seek to preserve business, training and wildlife habitat.</p>	<p>The assumptions for Objective 6.6 note: “<i>The effects of housing development on this objective will depend on the availability of school and college places to serve the new residents</i>”. It therefore considers the proximity of educational facilities to the site which is applied consistently to all sites appraised. No change</p> <p>The SA score takes account of proximity to an existing school, and therefore scores ++.</p> <p>SP18 in requires a new 2FE primary school as part of the development, to increase the primary school capacity of the area. No change</p> <p>Local Plan Policy SP18 allows an opportunity for a realigned runway through the Masterplan. No change</p>
33	<p>Concern about the assessment of Site Hat 1 (SDS5)</p> <p>The assessment of site Hat 1 against objective 4.4 should be amended to minor negative because; it will include a new northern edge made of hedgerows/copses; the GB boundary will be defined by the Salisbury line and the eastern parts of it will remain open/maintain a</p>	<p>Reassess site Hat 1 against objective 4.4. This should be amended from “significant detrimental effect likely” to ‘minor negative effect likely’</p>	<p>The SA is consistent with the assumptions in Appendix 2 of the SA report, and the evidence base, upon which the assumptions were based. The representation introduces evidence from the masterplan document prepared on behalf of the developer, but to be consistent with the appraisal</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>gap between WGC and Hatfield. Also allotments and Green spaces will be provided to the east of Green Lanes, as well as a Green Wedge to the NE of the site.</p> <p>Assessment of Hat 1 against objective 4.5 should be amended to minor negative because setting of The Old Cottage will be protected by a buffer and respected by mineral extraction. Also it should note that there is 2 areas of archaeological significance (and not 1).</p>	<p>Amend 4.5 for SDS5 to note two AAS.</p> <p>Reassess/amend the score of site HAT 1 against objective 4.5 from “significant detrimental effect likely” to ‘minor negative</p>	<p>of all site alternatives, the SA draws on the evidence prepared to inform the Local Plan and the wording of policy in the Local Plan itself.</p> <p>It is agreed that mitigation may help to address the effects identified (e.g. with respect to landscape and biodiversity) and these are listed in the final column of the appraisal matrix, against the effects identified. No change</p> <p>The SA is consistent with the assumptions in Appendix 2 of the report, and the evidence base upon which the assumptions were based. The representation introduces evidence from the masterplan document prepared on behalf of the developer, but to be consistent with the appraisal of all site alternatives, the SA draws on the evidence prepared to inform the Local Plan and the wording of policy in the Local Plan itself.</p> <p>Agreed, that the site appraisal should refer to two Areas of Archaeological Significance which overlap the site (AAS12 and AAS52). It is already scored as significant negative (uncertain) and this would remain.</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
			Minor modification proposed to the appraisal text; no change to SA score.
34	<p>Concern about assessment of Site WeG4a</p> <p>The assessment of site Weg4a (Marshmoor) against 4.6 should be amended to minor negative because it will include tree planting to create a green corridor adjacent to the local wildlife site, as grasslands and SuDS.</p>	Amend the scoring for site WeG4a under objective 4.6 to minor negative	<p>The SA is consistent with the assumptions in Appendix 2 of the SA report, and the evidence base upon which the assumptions were based. The representation introduces evidence from the masterplan document prepared on behalf of the developer, but to be consistent with the appraisal of all site alternatives, the SA draws on the evidence prepared to inform the Local Plan and the wording of policy in the Local Plan itself. No change</p>
35	<p>Concern about assessment of Site Hat 15 (SDS6)</p> <p>The assessment site Hat 15 against objective 4.4 should be amended to minor negative. It has a low-medium landscape sensitivity (and not medium-high) because it is used for mineral extraction, shielded by woodland, assisted by its topography and has a limited visibility from the wider landscape</p>	Amend the scoring for site Hat15 against objective 4.4 to minor positive.	<p>The appraisal of the policy for a New Village at Symondshyde SDS6 was based on the evidence that was prepared for use in the preparation of the Local Plan, and the existence or otherwise of sensitive receptors within or close to the site in accordance with the assumptions that under-pinned the SA for all sites (including the Landscape Sensitivity and Capacity Study).</p> <p>It is agreed that mitigation may help to address the effects identified (e.g. with</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
	<p>The assessment of Hat 15 against objective 4.5 should be amended to minor negative because the proposal will support the creation of the Welwyn Hatfield Green Corridor (SP12), to maintain a sense of space/separation between WGC and Hatfield</p>	<p>Amend the scoring for site Hat15 against objective 4.5 to minor negative</p>	<p>respect to landscape and biodiversity) and these are listed in the final column of the appraisal matrix, against the effects identified. No change</p> <p>The appraisal of the policy for a New Village at Symondshyde SDS6 was based on the evidence that was prepared for use in the preparation of the Local Plan, and the existence or otherwise of sensitive receptors within or close to the site in accordance with the assumptions that under-pinned the SA for all sites.</p> <p>It is agreed that mitigation may help to address the effects identified (e.g. with respect to landscape and biodiversity) and these are listed in the final column of the appraisal matrix, against the effects identified. No change</p>
2	<p>Criticism of the heritage assessment of Site BrP6</p> <p>Concerned that the SA has noted that site BRP6 may have a significant negative effect against objective 4.5. This is contrary to the previous SA that noted it may have a minor effect and Historic England's view that Brp6 is unlikely to have an adverse impact on Gobions Registered Historic Park and Garden.</p>	<p>Change the assessment of Site BrP6 to minor or negligible negative effect against SA Objective 4.5 (Heritage Assets).</p>	<p>The scoring is consistent with the SA assumptions (see Appendix 2). We looked again at setting of heritage assets, and the site assessment (Annex 1 p.469) refers to the likelihood of direct views from the Registered Park to the site due to local topography (prior to mitigation). Impacts may be reduced through mitigation. No change</p>

PSSA no.	Main Issue	Changes Sought	WHBC response
3, 4 6	<p data-bbox="394 252 985 284">General comments relating to BrP4 (HS22)</p> <p data-bbox="394 325 940 421">HS23 (BrP4) should read HS22 (BrP4) in paragraphs 6.380, 6.382, 6.401, of the SA Report.</p> <p data-bbox="394 462 985 558">Concern that site BrP4 will adversely impact congestion and highway safety because the roads are narrow and lack capacity for growth</p>	<p data-bbox="1034 325 1516 421">Change HS23 (BrP4) to read HS22 (BrP4) in paragraphs 6.380, 6.382 6.401,</p> <p data-bbox="1034 462 1200 494">None Stated</p>	<p data-bbox="1543 344 1890 408">Agree this is a typo. Minor modification proposed</p> <p data-bbox="1543 462 2063 526">This is a site suitability matter dealt with in the HELAA. No change.</p>

Comments specifically on the content of the Habitats Regulations Assessment

PSHRA no.	Main Issue	Changes Sought	WHBC response
6	<p>Impact of site SDS6 has not been fully assessed</p> <p>Potential impacts of Policy SP24 (New Village) has not been investigated.</p> <p>Appendix 2 has not undertaken a detailed assessment of how SP24 (new settlement) may impact neighbouring European sites. Also it has included generic mitigation measures.</p> <p>An Independent consultant should undertake an appraisal of proposed new village site and its effects/impacts on the loss of habitats, farmland and surrounding areas.</p>	<p>A detailed HRA by an independent consultant with more place specific mitigation measures identified in Appendix 2.</p>	<p>The effects of all the policies in the Proposed Submission Local Plan were subject to HRA.</p> <p>At the Screening Stage, Likely Significant Effects could not be ruled out for Policy SP24 with respect to water quality and quantity at The Lee Valley SPA and Ramsar, and air pollution and recreational pressure at Wormley Hoddesdonpark Woods SAC (see Chapter 5 and Appendix 2 of the HRA Report).</p> <p>The Appropriate Assessment stage (Chapter 6 of the HRA Report) looked into these matters in more detail and concluded that the Proposed Submission Local Plan would not have adverse effects on integrity of European sites, either alone or in-combination with other plans or projects. This conclusion has been supported by Natural England. No Change</p>
2	<p>Impacts of site HS22 has not been fully considered</p> <p>Site HS22 (BRP4) will have a major impact on wildlife and the supporting woodland (2) Site HS 22 will effect drainage, reservoir and pollution levels (i.e. noise).</p>	<p>None stated</p>	<p>The effects of all the policies in the Proposed Submission Local Plan were subject to HRA. At the Screening Stage, Likely Significant Effects could not be ruled out for Policy SADM31 (which includes site HS22) with respect to water quality and quantity at The Lee</p>

			<p>Valley SPA and Ramsar, and air pollution and recreational pressure at Wormley Hoddesdonpark Woods SAC.</p> <p>The Appropriate Assessment stage (Chapter 6 of the HRA Report) looked into these matters in more detail and concluded that the Proposed Submission Local Plan would not have adverse effects on integrity of European sites, either alone or in-combination with other plans or projects. This conclusion has been supported by Natural England. No change</p>
5	<p>Impact on wildlife is not assessed</p> <p>The impact on wildlife has not been assessed</p>	N/A	<p>A Habitats Regulations Assessment has been undertaken in accordance with the Conservation of Habitats and Species Regulations 2010 (see Welwyn and Hatfield Proposed Submission Local Plan 2016 Habitats Regulations Assessment Report prepared by LUC August 2016). No change</p>
3, 7	Habitats Regulations Assessment is legally compliant	N/A	Noted

Comments relating to the legal test of:

Whether the Council has complied with requirements arising from the Duty to Co-operate (DTC) on strategic/cross-boundary issues.

DLPPS no.	Reason	Changes Sought	WHBC response
61 responses (dlpps no's listed below)	<p>The Council has not complied with the DTC</p> <ul style="list-style-type: none"> • No specific reason given in relation to DTC • Information not clear on how to complete submission on DTC • Not possible as a layperson to assess whether or not there is legal compliance on DTC 	<ul style="list-style-type: none"> • WHBC should review and revisit the DTC, and engage with neighbouring local authorities to ensure strategic decision-making is taking place. 	<p>The Council considers it has met the DTC</p> <p>No change</p>
83, 92, 93, 103, 132, 187, 179, 664, 665, 670, 709, 711, 743, 800, 807, 853, 860, 917, 962, 966, 1015, 1056, 1087, 1094, 1099, 1100, 1104, 1113, 1114, 1115, 1116, 1117, 1118, 1101, 1103, 1127, 1133, 1153, 1168, 1196, 1211, 1248, 1309,	<p>No evidence of complying with the DTC</p> <ul style="list-style-type: none"> • No information about the detail or outcome of the DTC • No link on the Council's Evidence Base website to the DTC and an index search for "DTC" does not reveal any results. • No evidence of the outcome if the Council had been compliant with the DTC • Impossible to identify those documents that were used to formulate the DTC, therefore it is not possible to confirm the validity of many of the statements made. • No evidence on working with other authorities about, for example, feasibility of minerals extraction on Brookman Park site within the planned development timescale • WGC5 area operated as a landfill site for 70 years from about 1920. The Environment Agency website states that every level of waste is present on the site (http://bit.do/eawgc5) There is no evidence that WHBC has cooperated with the EA on this element of the plan, or that either of them has done any investigative 	<ul style="list-style-type: none"> • Review the DTC evidence included in the Plan in order to reach legal compliance • Provide evidence of DTC with surrounding councils and included in Plan • Publish clear evidence on how the Council has cooperated with neighbouring authorities to discharge the DTC, for example in meeting the full Objectively Assessed Needs for the Housing Market Area(s) • The arguments for and against a particular development site, and the scale of the 	<p>The Council summarised in the Plan and in the Annual Monitoring Reports what DTC activity has taken place. Relevant legislation and NPPF para 181 (as well as the national Planning Practice Guidance) requires the demonstration of effective cooperation at the point of submitting a Local Plan for examination. DTC activity is ongoing and a DTC Statement will be published at the point of submission.</p> <p>The Environment Agency has not raised any DTC concerns and has been consulted throughout plan preparation.</p> <p>No change</p>

DLPPS no.	Reason	Changes Sought	WHBC response
1401, 1402, 1403, 1406, 1870, 1872, 1883, 1884	works to ascertain the current level of contamination, where futures residents will use for leisure or employment.	<p>envisaged development, should be included in the Plan</p> <ul style="list-style-type: none"> • WHBC should show that it has (and will) cooperate with the EA and provide a full site survey of WGC5 independent of the land owner, together with an ecology report to assure this land is safe for human habitation and recreation/employment 	
230, 408, 456, 532, 557, 632, 640, 679, 690, 691, 692, 708, 727, 768, 853, 854, 874, 885, 891, 917, 956, 965, 969,1003, 1011, 1023, 1024, 1030, 1039, 1063, 1077,1083, 1084, 1091, 1094, 1099,	<p>The Council has not met its DTC</p> <p>Failing to show consistency that would occur by complying with the DTC with other relevant authorities, e.g. on Transport plans (LTP3 and LTP in progress) or with neighbouring councils, e.g. Hertsmere about Little Heath</p>	<ul style="list-style-type: none"> • Should show that it has considered the impact of developments on neighbouring boroughs • Should show that it has considered the contribution from other authorities in support developments • Should show that it has provided a consistent assessment of when allocations are strategic housing sites and when other larger scale developments are extensions to existing settlements 	<p>Relevant legislation and NPPF para 181 (as well as the national Planning Practice Guidance) requires the demonstration of effective cooperation at the point of submitting a Local Plan for examination. DTC activity is ongoing and a DTC Statement will be published at the point of submission.</p> <p>(Other issues raised, such as LCA and settlement level matters are referred to in the HELAA or in the Housing Sites Selection Background Paper. Strategic Development Sites are clearly shown as such in the Plan).</p> <p>No change</p>

DLPPS no.	Reason	Changes Sought	WHBC response
1100, 1101, 1103, 1104, 1107, 1115, 1116, 1117, 1133, 1113, 1114, 1118, 1136, 1260, 1289, 1306, 1337, 1338, 1339, 1341, 1358, 1359, 1400, 1401, 1402, 1403, 1406, 1661, 1726, 1872, 1881, 1884, 1885, 1923, 2086, 2087, 2088		<ul style="list-style-type: none"> Should show that it has sought consistency with Hertfordshire County Council's Landscape Character Areas for e.g. Brookman Park Show that the DTC has been used to ensure the plans are consistent with Herts CC Local transport Plans (current LTP3 or as currently in progress LTP4) Should show that the Council has taken account the impact of the Plan on the Little Heath area 	
83, 92, 93, 103, 112, 113, 114, 116, 117, 132, 175, 179, 403, 417, 419, 440, 487, 490, 504, 681, 682, 709, 711, 743, 801, 833, 854, 860, 862,	<p>Failed to co-operate effectively or positively with neighbouring authorities</p> <ul style="list-style-type: none"> Not aware of any consultation with adjacent parishes Insufficient co-operation with neighbouring authorities, e.g. North Herts on the Knebworth development, No evidence that East Herts has agreed to meet any of Hatfield's unmet housing need. Have gone out to consultation before East Herts. Water treatment works for Rye Meads near Hoddesdon are shared with south Stevenage, Hertford, Harlow and others, and these authorities are planning for a number of new homes. No evidence of joint working on this issue. 	<ul style="list-style-type: none"> Provide evidence of DTC compliance with all neighbouring authorities and key service/ infrastructure agencies Should show that Welwyn and Hatfield have considered other potential sites attached to existing urbanised areas thereby taking advantage of existing facilities including 	<p>DtC bodies have been consulted in the preparation of the Plan.</p> <p>Parish councils are not a DtC body but they have been consulted in the preparation of the Plan.</p> <p>A DTC Statement will be published at the point of submission.</p> <p>The Local Plan does not state that East Herts is meeting any of Welwyn Hatfield's housing needs.</p> <p>Other sites have been considered – these are set out in the HELAA, the</p>

DLPPS no.	Reason	Changes Sought	WHBC response
877, 930, 997, 1011, 1023, 1081, 1085, 1094, 1099, 1100, 1101, 1103, 1113, 1114, 1115, 1116, 1117, 1118, 1133, 1153, 1158, 1248, 1284, 1308, 1309, 1310, 1377, 1378, 1401, 1402, 1403, 1406, 1442, 1524, 1733, 1870, 1872, 1873, 1874, 1875, 1876, 1877, 1878, 1879, 1881, 1882, 1883, 1885, 1889, 1923, 1955	<ul style="list-style-type: none"> • Failed to consult with neighbouring and other interested authorities about the likely level of net migration to this region post Brexit • NPPF para 157 states Local Plans should “plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework”, supported by para 162 which requires an LPA to “work with other authorities and providers to: assess the quality and capacity of infrastructure for.....education”. • WHBC has a DTC and a specific duty to assess education capacity and have failed to do so in relation to the planning of primary school provision in Brookmans Park. • DLP Paragraphs 2.9 and 2.48 refer to the Hertfordshire Minerals Local Plan and the identification of Hatfield aerodrome as a preferred area for mineral working. No evidence is presented that the presence of minerals at strategic sites has been considered in conjunction with other authorities, and whether delivering homes within the plan period conflicts with the sterilisation of mineral deposits as a result of the development of this land. • No evidence of fulfilling the DTC with HCC and the Highways Agency 	<p>transport, schools, recreation and retail.</p> <ul style="list-style-type: none"> • Revisit the proposal included in the Plan to build a garden village further north in Hertfordshire on non-Green belt land • Should show how the Council has co-operated with other Boroughs on new ideas about sharing the development in other areas. • Should show that it has taken account of the impact on Woolmer Green of development in Knebworth (400 houses in North Herts Local Plan) and Stevenage. • Take account of impact on Lister Hospital of additional houses in WGC • Carry out and publish a study on the impact of housing developments across the region on the shared water treatment and supply from Rye Meads 	<p>Housing Sites Selection Background Paper and the SA as appropriate.</p> <p>Joint working has taken place on the production of the Water Cycle studies and the more recent Hertfordshire Water Study.</p> <p>Under the DTC this Council sought the advice of the County Council as Education Authority.</p> <p>Hatfield Aerodrome is not proposed for residential development and therefore there will be no sterilisation of the preferred minerals site. The Council has liaised with the Minerals Planning Authority on the content of the Plan and draft policy wording.</p> <p>The Council has continuously liaised with HCC and Highways England on the preparation of the Plan</p> <p>No change.</p>

DLPPS no.	Reason	Changes Sought	WHBC response
		<ul style="list-style-type: none"> • Work with HCC to plan and provide for sufficient primary school education for increased population at Brookman Park • Should include a feasibility study of minerals extraction, land sterilization and housing development within the plan period, in conjunction with appropriate authorities • Include evidence of co-operating with Hertfordshire CC and the Highways authority on transport issues in the Plan 	
711, 729, 1310, 2096	<p>Little weight given to the DTC</p> <p>The consultation response form should include a section on the DTC but this is missing from the WHBC response form and so DTC is given little weight The Local Plan should reflect the wishes of a significant part of Parish Council opinion.</p>	As above	<p>Section 6 of the response form provided the opportunity for respondents to raise issues around the DTC.</p> <p>Representations are taken into account.</p> <p>No change</p>
42 responses (dlpps no's)	<p>Failed to co-operate (consult) with St Albans District Council</p>	Ensure evidence is visible on the DTC compliance with neighbouring councils	DTC with St Albans has been ongoing from an early stage in plan preparation. WHBC will continue to

DLPPS no.	Reason	Changes Sought	WHBC response
listed below)	Welwyn Hatfield effectively confirmed to the Inspector leading the St Albans Local Plan examination that it has not complied with the DTC. No discussions have taken place to confirm how St Albans' unmet development needs will be met in Welwyn Hatfield.		work with SADC on strategic cross-boundary priorities. The St Albans' Inspector's findings clearly demonstrated it was St Albans that failed to cooperate effectively not the other way round. St. Albans has not acknowledged that it has unmet need. In any event Welwyn Hatfield is not in a position to assist other authorities in meeting their need. No change.
11, 43, 496, 866, 908, 930, 1011, 1127, 1153, 1310, 1523, 1524,	Failed to co-operate (consult) with Wheathampstead Parish Council	Ensure evidence is visible on the DTC compliance with neighbouring councils	Parish councils are not a DtC body but have been consulted in the preparation of the Plan. A DTC Statement will be published at the point of submission. No change
496, 866, 908, 1153, 1440, 1523, 1524	Failed to co-operate (consult) with Sandridge Parish Council	Ensure evidence is visible on the DTC compliance with neighbouring councils	Parish councils are not a DtC body but have been consulted in the preparation of the Plan. A DTC Statement will be published at the point of submission. No change
1440, 2167	Failed to co-operate (consult) with Colney Heath Parish Council (on behalf of Smallford and Lemsford Village) <ul style="list-style-type: none"> • Failed to co-operate (consult) with Lemsford Village • Not compliant with the DTC as regards sustainable groundwater reserves and Lemsford bridge. 	Ensure evidence is visible on the DTC compliance with neighbouring councils	Parish councils are not a DtC body but have been consulted in the preparation of the Plan. DtC with Hertsmere has been ongoing from an early stage in plan preparation.

DLPPS no.	Reason	Changes Sought	WHBC response
179, 423, 424 681, 711, 743, 768, 801, 809, 877, 891, 917, 962, 966, 1021, 1023, 1024, 1030, 1032, 1154, 1275, 1302, 1315, 1527	<p>Failed to co-operate (consult) with Hertsmere Borough Council</p> <ul style="list-style-type: none"> Local MP states that the Draft Local Plan has yet to fulfil its key DTC with Hertsmere Borough Council on how to meet the additional pressure that will be placed on key public services and local infrastructure. Council has not properly taken into account environmental effects of implementing the Local Plan in terms of the effects on the Little Heath area. 	<ul style="list-style-type: none"> Include information about DTC on how OAN numbers were agreed and thus if building in Little Heath would be appropriate. Show evidence on the DTC compliance with neighbouring councils Show that the Council and Hertsmere Council have complied with the DTC, and taken account that their local MP's request for evidence of working with neighbours in Hertsmere to address local concerns. Show how submissions made by Little Heath Residents Association have been considered Include access to Minutes of Meetings with Hertsmere BC in relation to HS24 (BrP7) to show the DTC in process 	<p>WHBC will continue to work with HBC (and others) on strategic cross-boundary priorities. HBC has not raised a DtC objection to the Draft Local Plan.</p> <p>Residents have responded to consultation. No significant constraints have been identified that would prevent the level of growth proposed at Little Heath. An Infrastructure Delivery Plan has been prepared in consultation with infrastructure providers.</p> <p>A DTC Statement will be published at the point of submission.</p> <p>No change</p>
442, 681, 1453, 1544	<p>Failed to co-operate (consult) with Broxbourne</p> <p>About 835 new properties are proposed to be built in neighbouring Goffs Oak but these figures were not taken</p>	<ul style="list-style-type: none"> Provide evidence of DTC compliance. Work with Broxbourne Borough Council 	<p>DtC with Broxbourne has been ongoing from an early stage in plan preparation. WHBC will continue to work with BBC (and others) on</p>

DLPPS no.	Reason	Changes Sought	WHBC response
	into account during the formulation of the WHBC Local Plan.	<ul style="list-style-type: none"> Take account of the Goffs Oak figures when allocating figures for Cuffley. 	strategic cross-boundary priorities. BBC has not raised a DtC objection to the Draft Local Plan. No Change
1094, 1113, 1114, 1115, 1116, 1117, 1118, 1406,	Failure to evidence co-operation about Roehyde	<ul style="list-style-type: none"> Provide evidence of DTC compliance. 	The HELAA sets out the position with regards to Roehyde including the cross-boundary nature of the site. Both WHBC and SADC agree that the site should not be allocated in their respective plans. No change
PSPM no.	Reason	Changes Sought	WHBC response
761, 762, 763, 764	The Council has not complied with the DTC No specific reason given in relation to DTC	No specific change sought	No change required

Full list of dlpps numbers commenting on ‘The Council has not complied with the DTC’: 90, 185, 425, 426, 438, 469, 489, 531, 541, 543, 545, 547, 558, 585, 678, 683, 684, 685, 826, 851, 852, 866, 915, 960, 961, 963, 964, 974, 1067, 1077, 1093, 1119, 1154, 1205, 1246, 1266, 1311, 1335, 1340, 1342, 1347, 1348, 1363, 1583, 1692, 1743, 1759, 1880, 1956, 1997, 1998, 1999, 2001, 2059, 2060, 2064, 2097, 2098, 2099, 2100, 2101

Full list of dlpps numbers commenting on ‘Failed to co-operate (consult) with St Albans District Council’: 187, 403, 419, 417, 423, 496, 670, 682 853, 866, 877, 883, 908, 997, 1003, 1011, 1094, 1099, 1100, 1101, 1103, 1113, 1114, 1115, 1116, 1117, 1118, 1121, 1127, 1153, 1309, 1310, 1377, 1378, 1401, 1402, 1403, 1406, 1440, 1523, 1524, 1953

Comments relating to the legal test of:

Whether the Plan has been prepared in accordance with the LDS (LDS).

DLPPS no.	Reason	Changes Sought	WHBC response
22, 26, 35, 83, 92, 93, 103, 113, 114, 116, 117, 525, 557, 798, 966, 989, 1039, 1081, 1083, 1087, 1119, 1351, 2086, 2087, 2088	<p>The Plan does not comply with progress set out in the LDS, e.g.</p> <ul style="list-style-type: none"> • Not in line with 2012 consultations • (Site) not included in the draft Local Plan 2015 • The Local Plan was not presented in a timely manner • The LDS programme has been delayed/obstructed by the Council 	<ul style="list-style-type: none"> • Remove the proposal for a new village • Suspend the LP Examination in Public until further consultation as planned in the LDS has been carried out 	<p>The LDS sets out the Council's proposed programme for preparing the Local Plan. The LDS has been updated as necessary throughout Plan preparation. Consultation has been carried out in accordance with the timetable.</p> <p>No change</p>
112, 113, 114, 116, 117, 525, 678, 684, 685, 798, 807, 809, 833, 862, 870, 989, 1087, 1107, 1134, 1328, 1401, 1402, 1403, 2087, 2088, 2167	<p>The Plan does not comply with procedures required for the LDS</p> <ul style="list-style-type: none"> • Procedurally incorrect in the submission of the LP in regard to the LDS • Inconsistent process in reviewing and considering alternative sites; site appraisal/selection methodology unsound and incorrect 	<ul style="list-style-type: none"> • Adhere to paragraph 182 of the NPPF and Section 1 (Pre-Submission) paragraphs 1.1, 1.2 and 1.3 of the Procedural Practice in the Examination of Local Plans • Review process of site selection 	<p>The LDS sets out the Council's proposed programme for preparing the Local Plan. The Plan has been prepared in accordance Paragraph 182 of the NPPF and account has been taken of the Procedural Practice in the Examination of Local Plans. The HELAA and the Sites Selection Background Papers set out how the Council considered sites in a consistent manner.</p> <p>No change</p>
371, 525, 690, 708, 833, 874, 870, 885,	<p>The Plan does not comply with or omits necessary documents to be included in LDS</p> <ul style="list-style-type: none"> • Lack of Master-planning leading to a Supplementary Planning Document e.g. for Panshanger 	<ul style="list-style-type: none"> • Provide clarity of where the evidence is for what development will be 	<p>The LDS sets out the Council's proposed programme for preparing the Local Plan.</p>

<p>1024, 1026, 1038, 1081, 1083, 1087, 1091, 1091, 1107, 1127, 1216, 1248, 1300, 1400, 1590, 2058, 2088, 2167</p>	<ul style="list-style-type: none"> • No assessment of educational capacity included re Brookmans Park included in LDS documents • The Objective Assessed Needs (OAN) is not properly addressed so the LDS cannot function • No assessment included in LDS documents of WGCC5(SDS2) a former landfill site • No strategy for retail development (related employment growth figures are too high) included in suite of LDS documents • Linkages to infrastructure assessment, e.g. Hertfordshire Infrastructure and Investment Strategy Policy not clearly made • GTTS policy included in LDS not compliant with DCLG policy on Gypsies and Travellers in relation to settlement proximity and Green Belt • Linkage to flood risk assessment for e.g. Water End not included in LDS documentation • Site EA6 Part 2 refers to undeveloped parts of Hatfield Business Park (as at 01/04/2016) thus a flawed document included in LDS 	<p>allowed and what will not in Panshanger</p> <ul style="list-style-type: none"> • Provide HCC assessment of delivering primary school capacity • Show linkages to HCC's strategies so that consistency is shown with HCC's Transport Vision for Hertfordshire to 2050 – Technical Report (2015), LTP3 and LTP4 (in progress) • Ensure review of OAN is included in LDS • Add a major scientific and environmental report to ensure the area is safe, in the LDS • Apply DCLG policy to policy documents on Gypsy and Traveller site locations in Local Plan to ensure documents in LDS are compliant. • Amend document attached to LDS to allow uses in accordance with Sch. 1 of permission <i>6/2015/2043/OUTLINE</i>, to include B1, B2, hotel and Sui Generis Uses. 	<p>The Draft Local Plan set outs the requirements for masterplan preparation.</p> <p>An extensive evidence base has informed the preparation of the Plan. Other comments do not relate to matters that are appropriate to include in the LDS.</p> <p>It is not necessary to include the level of detail mentioned in these representations within the LDS.</p> <p>No change</p>
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<p>112, 113, 114, 116, 117, 525, 658, 803, 807, 809, 833, 851, 94, 1039, 1081, 1087, 1119, 1127, 1216, 1331, 2058, 2167</p>	<p>The Plan fails to provide adequate Risk Assessment in LDS</p> <ul style="list-style-type: none"> • The risk that the LP cannot be delivered because of a lack of soundness is not addressed • Unsoundness of HS22 (BrP4) not mentioned in Risk Assessment 	<ul style="list-style-type: none"> • Review full Local Plan as base-line figures and some maps are incorrect • Provide assessment of infrastructure/ services • Provide a strategy for realistic retail redevelopment • Remove HS22 from the plan or include a Risk Assessment • Address the risk of failing to deliver on the OAN because the LP is not sound 	<p>The LDS sets out the Council's proposed programme for preparing the Local Plan.</p> <p>These comments do not relate to whether the Plan has been prepared in accordance with the LDS.</p> <p>The risk assessment within the LDS relates to the process for preparing the plan. The purpose of the risk assessment is to identify the risk to the Plan timetable. It includes evidence gathering, soundness and legal matters amongst other matters.</p> <p>The LDS is not the appropriate document to consider the deliverability of sites on an individual basis. This is addressed in the evidence base.</p> <p>No change</p>
<p>4, 14, 24, 35, 43, 79, 97, 113, 116, 117, 132, 175, 525, 557, 589, 658, 682, 683, 684, 685, 727, 809, 860, 870, 962, 1024, 1039, 1042, 1051, 1056,</p>	<p>General comments:</p> <ul style="list-style-type: none"> • No adequate infrastructure assessment aligned to LDS • No assessment of heating and power, enhanced eco-friendly building standards, traffic surveys or traffic projections included in documents aligned with LDS • Symondshyde development increases the reliance on cars, and the need to increase the road network but no alignment with process of assessment in LDS • No demonstration of exceptional circumstances for using Green Belt land included in documents attached to LDS • Likelihood of coalescence between villages not addressed in consultations on Local Plan, therefore not aligned to LDS process 	<ul style="list-style-type: none"> • Identify non-Green Belt land/more suitable land adjacent to existing developments • Symondshyde is not suitable for sustainable development so remove from the DLP • Provide an Environmental Impact Assessment for e.g. Little Heath, undertaken by independent consultants 	<p>The LDS sets out the Council's proposed programme for preparing the Local Plan.</p> <p>These representations do not raise matters which directly relate to the LDS or whether the plan has been prepared in accordance with the timetable set out therein.</p> <p>No change</p>

1083, 1091, 1216, 1248, 1300, 1304, 1313, 1331, 1463, 1590, 2086, 2087, 2088	<ul style="list-style-type: none"> • Issue of preserving land for future generations/ proposing using land of higher environmental value not included in LDS documentation 	<ul style="list-style-type: none"> • Provide an Appraisal of Highways and Traffic Impact • Seek consistency with Hertfordshire Infrastructure and Investment Strategy 	
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A further 47 respondents ticked the box to indicate their view that the Plan has not been prepared in accordance with the LDS, but did not provide any reasons. These dlpps numbers are: 9, 14, 26, 31, 32, 41, 43, 49, 79, 97, 121, 122, 132, 151, 175, 184, 230, 239, 342, 400, 408, 440, 554, 640, 678, 679, 691, 692, 800, 801, 803, 851, 866, 920, 941, 965, 1051, 1056, 1075, 1086, 1091, 1260, 1294, 1306, 1311, 1328, 2058