

Appendix A2

Main Issues Soundness Summary
Draft Local Plan Proposed Submission (DLPPS)
Chapters 1-6 (p9-46) – Introduction/The Overarching Strategy

Chapter 1 – Introduction

DLPPS no.	Main issues	Changes sought	WHBC comment
588, 799, 833, 839, 1010, 1021, 1022, 1092, 1117, 1119, 1132, 1177, 1248, 2167	<p>Consultation process has not been followed and requires updating</p> <p>The Introduction to the Plan is not effective, not justified and/or not compliant with the NPPF because:</p> <p>Consultation was incomplete or inadequate Only 1.7% of the consultation respondents in 2015 commented on the sustainability report i.e. 1.7% of 1.4% of the population (0.024% of the borough population). The lack of engagement with residents and the lack of account taken of past consultation responses, makes any plan drafted on the basis of these consultations unsound.</p> <p>Unsound because only 25 responses to the consultation were received on the SCI which was then used to underpin community involvement for this process although not accordance with the Council's SCI</p> <p>Consultation was incomplete or inadequate Poor communication, consultation and engagement with local people Insufficient information about how the Plan complies with the SCI No guidance on what is 'Sound' or 'Legally Compliant' included in the introduction The limit of only commenting on Soundness and Legal Compliance is confusing for</p>	<ul style="list-style-type: none"> • Update the paragraph to reflect lack of consultative processes • Give more notice and guidance/information on how to respond to the consultation, particularly for 'hard to reach' groups • Include a definition of 'soundness' and 'legal compliance' in the Introduction, and expand the basis on which comments can be made • Strengthen Para 1.5 substantially 	<p>Consultation has been carried out in accordance with the timetable and with due process</p> <p>No change required</p> <p>Policy 1.5 reflects the actuality of consultation</p> <p>No change</p> <p>The SCI has been produced in accordance with NPPF requirements</p> <p>No change</p> <p>Consultation has been carried out in accordance with the timetable and with due process</p> <p>No change</p> <p>Definitions are set out in the Foreword and were issued in guidance to the consultation</p> <p>No change required</p>

	<p>residents – more education and guidance required from the Council</p> <p>No evidence the SCI has been adhered to; not followed the SCI; the SCI is flawed in any case</p> <p>No direct contact with households affected, only with those already in contact with the Council</p> <p>Consultation process too difficult</p> <p>Implementation of the SCI has been ineffective, not reached a large number of residents The Council has excluded/discouraged comments from residents</p> <p>5,900 responses from around 1,600 respondents is not a significant number (1.4% of the borough population) and includes a proportion of developers and their agents</p> <p>No direct feedback to the community or response to objections in the face of a number of objections</p> <p>Poor communication efforts by WHBC</p> <p>Ward councillors have voted in favour of development proposals despite assuring residents they wouldn't</p> <p>The current consultation does not mention 'hard to reach' groups</p>		
<p>112, 372, 408, 417, 514, 729, 747, 799, 833, 839, 877, 961, 1010, 1021,</p>	<p>Evidence-base supporting the Plan</p> <p>The Introduction is not justified and not compliant with NPPF requirements and has not been prepared positively because:</p>	<ul style="list-style-type: none"> The Plan should include input from local residents, and have the genuine 	<p>The Introduction is a high level guide to the rest of the plan and it is not appropriate or necessary to make more</p>

<p>1022, 1117, 1119, 1132, 1177, 1248, 1865, 1909</p>	<p>Previous objections not answered, e.g. about infrastructure</p> <p>No evidence of meaningful engagement at an appropriate scale with local residents, or of ways of educating people how to use the consultation system</p> <p>No evidence of a strategy for engaging 'hard to reach' groups or that the new criteria/their meaning have been communicated effectively particularly to 'hard to reach' groups as set out in the SCI</p> <p>No challenging alternative viewpoint on facts was enabled</p> <p>The original parameters, upon which the Plan was defined, e.g. population growth, need to be reviewed on a regular and frequent basis.</p>	<p>backing of the elected Councillors</p> <ul style="list-style-type: none"> • Original parameters, like population growth, need to be reviewed on a regular basis • Extend the Plan period to 2033 as a 'round number' 	<p>detailed references to the evidence base in this section.</p> <p>The consultation statements set out a more detailed response to issues raised in previous consultations.</p> <p>NPPF (para. 57) states that local plans should be drawn up for an appropriate time scale, preferably 15 years), taking account of longer term requirements. No requirement to have a 'round' number to 2033.</p> <p>No change</p>
<p>109, 112, 372, 588, 729, 747, 799, 833, 839, 877, 961, 1021, 1117, 1119, 1177, 1284, 1309, 1865, 1870, 1909, 2171</p>	<p>Non-compliance with the documents and process required for the Local Development Scheme</p> <p>The Introduction is not consistent with the NPPF, not justified and not effective because:</p> <p>The Plan is in contradiction to the TCP (Local Planning) (England) Regulation 22</p> <p>Most development in the Plan is proposed on Green Belt land - conflicts with Local Plan Process</p> <p>The Plan structure does not provide a clear and effective base for the delivery of its strategies and policies.</p>	<ul style="list-style-type: none"> • Publish its Statement of Compliance on its evidence base and in the submission Local Plan thereby identifying strategic matters and how all parties have made reasonable efforts to address issues through co-operation • Review and revisit the DTC and engage with neighbouring local authorities for strategic decision making • Withdraw the present submission for amendment 	<p>The Plan provides an effective strategy to guide development in the borough over the plan-period.</p> <p>Consultation was Reg 19 stage (not Reg 22 stage). The relevant documentation will be submitted to the SoS in accordance with Reg 22.</p> <p>The Council has decided that exceptional circumstances exist to release land from the Green Belt. The NPPF allows for Green Belt boundaries to be reviewed in such circumstances through the Local Plan process.</p> <p>No change</p>

		<ul style="list-style-type: none"> • Work with the community to find solutions. • Consult local people fully and address infrastructure concerns • The presentation of the policies in the Local Plan be revised so that the strategic policies appear first, making reference to site allocations as appropriate, with the development management policies appearing in the second part of plan • Include the plan period, 2013-2032 on the front cover 	<p>The Duty to Co-operate is ongoing and a statement will be published at the point of submission.</p> <p>The Introduction is a high level guide to the rest of the plan and further detail on the Local Development Scheme is unnecessary in this section</p> <p>No change</p> <p>The format of the document is structured to guide development with reference to both strategic and site allocation/development management policies together with implementation and monitoring for each topic so that all the policies on a particular issue can be found in one section.</p> <p>No change</p>
1021, 1022, 1117, 1132, 2167	<p>Sustainability Appraisal and Habitats Regulations Assessment are flawed</p> <p>The Introduction is not justified, planned positively or consistent with the NPPF because:</p> <p>It is based on the Plan evidenced by a flawed Sustainability Appraisal and/or Habitats Regulations Assessment</p> <p>Only 1.7% of the consultation respondents in 2015 commented on the sustainability report (1.7% of 1.4% of the population = 0.024% of the borough's population)</p>	No comments relate directly to the Introductory paragraphs	<p>The Introduction is a high level guide to the rest of the plan and further detail on the Sustainability Appraisal and Habitats Regulations Assessment is unnecessary in this section. The Sustainability Appraisal and HRA have been prepared in accordance with relevant legislation and are not flawed. Documents have been available at relevant consultation stages for people to make comments on.</p> <p>No change</p>
729, 877, 1021, 1865	The Plan failed in its Duty to Co-operate with neighbouring authorities	<ul style="list-style-type: none"> • Comply with its Duty to Cooperate and cease Reg19 consultation until the Duty to Co-operate has been met, 	Consultation has been carried out in accordance with the timetable and with due process.

	<p>The Introduction is unsound as it reflects the Plan, and the Plan is not consistent with the NPPF, not justified and not positively prepared or effective because:</p> <p>Inadequate engagement about proposals for a new Garden City</p> <p>Overload on additional infrastructure resulting from lack of co-operation between councils</p> <p>No evidence of co-operation with neighbouring authorities or compliance with the DTC to seek to meet unmet development needs</p> <p>Failure to properly engage with the duty to co-operate adequately means the local plan fails to benefit from the results of such engagement and is therefore not positively prepared and will therefore be ineffective.</p> <p>Evidence that the Council has fulfilled its Duty to Co-operate with neighbouring councils</p>	<p>with Local Plan amended to include site allocations in sustainable locations</p>	<p>Duty to Co-operate activity will continue until the point of submission.</p> <p>No change</p>
<p>408, 1092, 1341, 1401, 1442, 1870</p>	<p>Representations refer to lack of soundness in the Introduction to the Plan but do not specify a reason</p>	<p>No changes sought in the Introduction</p>	<p>Issues are dealt with in the relevant sections</p> <p>No change</p>

Chapter 2 – ‘Welwyn Hatfield Now’

DLPPS no.	Main issues	Changes sought	WHBC comment
927	<p>The Plan misunderstands the true extent of deprivation in Hatfield (2.23-2.25)</p> <p>The Plan is not justified because over over-reliance on the Index of Multiple Deprivation (IMD), and therefore fails to recognise the way in which the student population of Hatfield masks the deprivation of the town’s ‘resident’ population.</p>	<p>A more detailed review of levels of deprivation in Hatfield is required.</p>	<p>Although reference is made by way of context, the IMD has not directly informed the Plan. The vision and local objectives (p155-157) reflect the demographic character and resultant challenges within Hatfield, and it is not considered that a more detailed review of deprivation in Hatfield is necessary. No change.</p>
931, 1081	<p>The Council’s approach to previous consultation has been flawed (2.26-2.36)</p> <p>The Plan is not positively prepared, justified, effective or consistent with national policy because consultations to date have been misleading, and have merely been an attempt to delay the Local Plan and minimise the amount of housing to be built.</p> <p>The Plan is not positively prepared, justified, effective or consistent with national policy because the previous summaries of consultation responses have ignored the responses made and recommendations to remedy identified shortcomings.</p>	<p>The Council should carry out fresh Regulation 18 and 19 consultation, with proposals to deliver sites which meet the objectively assessed housing need in full.</p> <p>As above</p>	<p>It is also inevitable that proposals will evolve over time. The DLPPS is considered to be sound in terms of its current policies on housing supply. No change.</p> <p>Whilst all responses are considered, the Council must ultimately take a balanced view about the most appropriate way forward and as such it is impossible to satisfy all concerns. Previous Consultation Statements have since been amended to reflect the wishes of this particular respondent to be identified as an organisation, but given the summarised</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
<i>Continued</i>	<p>The Plan is not positively prepared, justified, effective or consistent with national policy because evidence base documents are withheld from all but a small circle of Councillors until they are several months old (e.g. of advice received from a former Planning Inspector in May 2016 being published in August).</p> <p>The Plan is not consistent with national policy on consultation reporting.</p>	<p>As above</p> <p>An objective assessment of consultation responses and tracking of the changes resulting from consultation is needed throughout.</p>	<p>nature of these it is not possible for comments made to be set out in full. No further change.</p> <p>There would have been no requirement to publish the advice cited (which is not part of the evidence base), but this was nevertheless published prior to the start of the consultation in the interests of transparency. Evidence base documents are reported to the Council's Cabinet Housing and Planning Panel prior to full publication. No change.</p> <p>Consultation Statements for previous consultations, setting out how the DLPPS has evolved from comments made, have been published online. No change.</p>
629, 1402, 1868, 1959	<p>The Council has not complied with its duty to cooperate (as a soundness issue) (2.37-2.42)</p> <p>The Plan is not positively prepared, justified, effective or consistent with national policy because no evidence of how the Council has complied with the duty (such as a Statement of Compliance) has been published.</p>	<p>A Statement of Compliance identifying the strategic matters to be addressed and efforts to cooperate should be published.</p>	<p>The Council summarised in the Plan and in the Annual Monitoring Reports what Duty to Cooperate 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 <i>submitting</i> a Local Plan for examination. Duty to Cooperate activity is ongoing and a</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
<i>Continued</i>	<p>The Plan is not justified or consistent with national policy because St Albans (and other affected planning authorities) were not involved in agreeing the housing and economic market areas, needs for development, and consideration of other options before publication.</p> <p>The plan is not justified or consistent with national policy because the 2013 Joint Green Belt Review (St Albans and Dacorum with Welwyn Hatfield) has been ignored.</p>	<p>The Plan should not be submitted for examination until these points have been addressed.</p> <p>The Plan should not be submitted for examination until this has been addressed.</p>	<p>Duty to Cooperate Statement will be published at the point of submission.</p> <p>As part of the Council's ongoing efforts under the duty to cooperate, neighbouring authorities were consulted (and mostly provided feedback) on the Strategic Housing Market Assessment and Economy Study. However, because of differing timescales in plan production it was not always possible to produce joint work. Neighbouring authorities have generally established differing economic and housing market areas which, whilst recognising a relationship, exclude Welwyn Hatfield. No change.</p> <p>The Joint Green Belt Review formed Stage 1 of a 2-stage process of Green Belt Review – Stage 2 considered smaller individual land parcels within the strategic Stage 1 parcels. Site selection for the Local Plan both considered and was consistent with the findings of both the Stage 1 and Stage 2 Green Belt Reviews. No change.</p>
1603, 1708	<p>Other duty to cooperate issues (2.37-2.42)</p> <p>Welwyn Hatfield's response to Broxbourne's Regulation 18 consultation identified that Welwyn Hatfield may not be able to meet its housing needs in full and requested Broxbourne to consider whether it could help to meet any unmet need. Broxbourne BC has advised that it seems unlikely that they will be able to assist.</p>	None stated.	Noted.

DLPPS no.	Main issues	Changes sought	WHBC comment
<i>Continued</i>	Three Rivers District and Welwyn Hatfield are not in the same housing market area, and duty to cooperate matters between the two authorities are therefore limited in nature.	None.	Noted.
797, 947, 1588, 1599	<p data-bbox="387 411 1131 667">Housing and economic market areas (2.43-2.45) The Plan is not justified, effective or consistent with national policy because the Housing Market Area is too tightly-drawn and downplays the borough's housing market relationship with London. This in turn means that opportunities to meet need arising from London in a more sustainable location are not being explored.</p> <p data-bbox="387 850 1131 1018">Within the context of the London Stansted Cambridge Corridor (LSCC) it would be useful to explore economic market linkages with North London and emerging regional issues for industry and logistics (such as issues finding locations for warehousing).</p> <p data-bbox="387 1241 1131 1345">The Plan is not positively prepared or justified because it fails to include Hertsmere in the Functional Economic Market Area.</p>	<p data-bbox="1142 459 1467 499">None stated.</p> <p data-bbox="1142 850 1467 890">None stated.</p> <p data-bbox="1142 1241 1467 1345">Review why market area fails to include Hertsmere.</p>	<p data-bbox="1478 459 2072 834">The Strategic Housing Market Assessment indicates that defining the housing market around Welwyn Hatfield is complex. Defining a largely self-contained housing market area would necessitate the inclusion of a very large number of local authority areas, potentially not adjoining, and which may in any case have stronger relationships elsewhere. No such request has been received from the London boroughs or the GLA. No change.</p> <p data-bbox="1478 850 2072 1225">Noted. Whilst acknowledging that Welwyn Hatfield sees relatively large amounts of out-commuting into London, the Economy Study does not include North London in Welwyn Hatfield's Functional Economic Market Area because the borough sees relatively little in-commuting from London. In any event the borough does not have any suitable locations for new employment floorspace beyond those required to meet the borough's own needs. No change.</p> <p data-bbox="1478 1241 2072 1364">The WH FEMA identifies those areas with which WH has the strongest relationships (East Herts, St Albans, Luton, North Herts and Stevenage). Hertsmere lies within the</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>The housing market area is tightly defined, despite the borough's significant interrelationships with London. However, the consideration of migration from London when establishing housing need is welcome.</p>	<p>None stated.</p>	<p>SW Herts FEMA, reflecting its strongest relationships. No change.</p> <p>Noted.</p>
<p>1883</p>	<p>References to minerals and waste (2.48-2.49)</p> <p>The Plan is not positively prepared, justified, effective or consistent with national policy because it lacks sufficient detail on minerals.</p>	<p>The Plan should be amended to provide the decision maker with a clear indication of how to react to a proposal with regard to minerals.</p>	<p>It is not the role of this plan to set out details relating to the mineral planning process. It is considered that it is more appropriate for Welwyn Hatfield's website to provide such details. No change.</p>
<p>851, 2030, 2107</p>	<p>General comments (Chapter-wide)</p> <p>The historic development of New Towns in the borough has put it out of character with the rest of Hertfordshire.</p> <p>Support the references to minerals in para 2.9 and 2.48 and to waste in 2.49.</p> <p>Support the references to heritage in para 2.10.</p>	<p>This section should paint a less selective and biased picture of historic development.</p> <p>Suggested amended wording to clarify which mineral assets are most prevalent in Hertfordshire, plus additional text providing extra minerals context.</p> <p>Additional reference should be made to Scheduled Ancient Monuments and Heritage at Risk.</p>	<p>Relevant wording considered to be entirely factual. No change.</p> <p>Noted. A minor modification will be made to para 2.9 for accuracy, however it is not considered necessary for a Local Plan which does not deal with minerals or waste matters to set out any further context about minerals and waste issues in Hertfordshire.</p> <p>Noted. This text is for context and does not purport to be a comprehensive list of local heritage assets. Significant additional information is provided in the supporting text to Policy SADM15 (Heritage). No change.</p>

Chapter 3 – Vision and Borough-wide Objectives

DLPPS no	Main issues	Changes sought	WHBC comment
1617, 1688, 1944	<p>The proposed targets (12,000 new homes, of which 6200 will be built in the Green Belt) within the spatial vision are flawed and cannot be justified.</p> <p>The plan is not justified or consistent with national policy because there is insufficient evidence to support the council's preferred level of growth. Some development needs will need to be met elsewhere.</p> <p>Brownfield sites should be prioritised and land should not be taken out of the Green Belt.</p> <p>Current infrastructure capacity will not be able to cope with the proposed growth. New provision (e.g. schools and transport) will be needed.</p>	Amend text to exclude specific numbers of dwellings to be built and number of homes to be built in the Green Belt and clarify that development will be built elsewhere.	<p>The targets are based on up-to-date evidence, consistent with national planning policy set out in NPPF and NPPG. However the vision incorrectly referred to 6,200 dwellings being built in the Green Belt as only</p> <p>We consider that the target represents a reasonable balance between objectively assessed needs and constraints such as Green Belt, and other areas of restraint. This is entirely consistent with paragraphs 14, 17 and 84 of the NPPF.</p> <p>The shortfall without releasing Green Belt sites would be significant.</p> <p>Minor Modification to the fourth paragraph to update number of homes to be delivered through a planned release of Green Belt land</p>
1044	<p>“Planned” releases to Green Belt will potentially restrict future growth</p> <p>Support is given towards a limited release of green belt land. However, the plan is not effective because the reference to “planned” releases within the spatial vision means it is in danger of limiting future Green Belt releases and restricting the plan’s ability to deliver the new homes required over the entire plan period.</p>	Delete the word “planned” from the first sentence of the fourth paragraph of the spatial vision	<p>Disagree. NPPF clearly states that Green belt boundaries “<i>should only be altered in exceptional circumstances, through the preparation or review of the Local Plan</i>”.</p> <p>No change</p>

DLPPS no	Main issues	Changes sought	WHBC comment
1045	<p>Green Belt boundaries will need to be reviewed before the end of the plan period</p> <p>The plan is not positively prepared, justified or consistent with national policy because it is not considered realistic that the boundaries of the Green Belt will not need to be reviewed before 2032. The Council has so far failed to adequately demonstrate that it will be able to meet its objectively assessed needs as well as the longer term needs of development.</p>	<p>Delete the following from objective 1: <i>“to ensure that its boundaries will not need reviewing before 2032.”</i></p>	<p>Accept change.</p> <p>Minor modification.</p>
1761	<p>Cross boundary links between settlements have not been fully recognised.</p> <p>The vision is not positively prepared or effective because it fails to recognise the need for cross-boundary cooperative approach to economic growth and transport provision, making best use of links to London and Cambridge.</p>	<p>“Having worked together with other local authorities and highway authorities on a joint economic and integrated public transport strategy, Hatfield, St Albans, Welwyn Garden City and Hertford will be developing into a vibrant and sustainable economic cluster.”</p>	<p>The Hertfordshire Strategic Economic Plan sets out the strategy for the sub region and the references to Welwyn Hatfield’s role as an education hub and its links to Cambridge and London accord with this vision.</p> <p>No change</p>
304, 309, 481, 1910, 2105, 2112	<p>The extent of growth within the larger villages as set out in the spatial vision is not consistent with their future capacity and size.</p> <p>More land should be allocated in the larger villages (e.g. Welwyn, Digswell and Welham Green) to take advantage of transport links and services. The proposed village and urban extensions (Marshmoor and Welham Green) are not of sufficient size to accommodate both current and future housing requirements during plan period.</p> <p>Constraining supply in Welham Green and across the borough is contrary to strategic objectives.</p>	<p>Apportion more growth to the larger villages i.e. not limited but modest growth</p> <p>Welham Green should be moved up the settlement hierarchy to become a larger village excluded from the Green Belt.</p>	<p>Disagree. It is appropriate that there should be more limited growth in and around the villages as they have fewer services and facilities than the towns. Sufficient land has already been allocated in and around the large excluded villages consistent with their level of services and facilities and infrastructure constraints. No change</p>

DLPPS no	Main issues	Changes sought	WHBC comment
	Inconsistency between the vision (which seeks to limit the extent of growth around the villages) and the level of growth within Woolmer Green.		
683, 854, 860, 1152, 1617, 1688, 1873, 1944	<p>The inclusion of the new settlement within the spatial vision has not been justified.</p> <p>The plan is not justified because it does not comply with the principles of sustainable development.</p> <ul style="list-style-type: none"> • Development will encroach further into the Green Belt, driving a wedge between Wheathampstead, St Albans and Hatfield. • Loss of tranquillity and open countryside. • Does not meet the duty to cooperate • Remoteness of location • Exception to the policy of only allowing Green Belt exemptions to sites adjoining existing settlements. <p>The location of the proposed village in the Green Belt does not sit well with the vision objectives associated with the quality and attractiveness of the countryside and opportunities to improve travel choice. It also fails to make use of suitable, available and achievable sites in sustainable locations (e.g. brownfield land).</p>	<p>Delete the reference to a new village from the spatial vision:</p> <p>Other references to the new village should also be removed.</p> <p>Alternative sites should be allocated (e.g. Brookmans Park)</p>	<p>The Housing and Employment Land Availability Assessment considered the site to be suitable available and achievable for development. The site selection process as set out in the Housing and Site Selection Background Paper considered the impact on the Green Belt, infrastructure implications and its sustainability.</p> <p>When drawing up or reviewing Green Belt boundaries the Council is required to promote sustainable patterns of development. This includes the creation of new settlements.</p> <p>No change</p>
860, 981, 1131, 1152, 2015	<p>The spatial vision should consider potential alternatives (e.g. garden cities) as part of the long term approach to growth</p> <p>The plan is not justified, positively prepared or consistent with national planning policy because it fails to outline a clear planned vision for the future. A longer term perspective to growth is required beyond 2032.</p>	No specific changes have been sought	<p>The plan is only required to set out a vision to 2032. Whilst there are early discussions across Hertfordshire about how best to meet longer term needs it is too early to state what form this will take.</p> <p>The plan does propose a new free-standing village settlement at</p>

DLPPS no	Main issues	Changes sought	WHBC comment
	<p>A new garden city would offer the most effective way to deliver additional housing with minimal impact on existing communities in conjunction with East Herts.</p> <p>Welwyn Garden City has already reached its optimum size in terms of infrastructure and services and further expansion would undermine the garden city principle of towns surrounding belts of open countryside</p> <p>Urban extensions on the edge of existing towns constitute an unbalanced and piecemeal approach to growth. A more imaginative solution should be sought.</p>		<p>Symondshyde. However, no site or proposal has been put forward through the plan process of sufficient size and scale to deliver a new town within the borough.</p> <p>It is considered that Welwyn Garden City has the capacity to expand through a mixture of urban capacity and urban extensions..</p> <p>No change</p>
981	<p>Marshmoor should not be identified as a housing and employment site within the spatial vision.</p> <p>The plan is not positively prepared or justified because the justification for the inclusion of Marshmoor as a mixed-use site is flawed and there are no exceptional circumstances to warrant its removal from the Green Belt.</p> <p>The lack of available employment land is not valid justification because other uses such as residential and other commercial activities have been repeatedly granted permission on existing employment sites. There appears to be sufficient employment land in the borough to address future needs.</p>		<p>There is insufficient land to meet our employment needs for the plan period. This site offers the opportunity to provide a site for life sciences and meet key objective of the Strategic Economic Plan.</p> <p>No change</p>
1663, 1664	<p>The strategic objectives of the plan (1, 2, 4, 5, 6 & 9) cannot be met due to the potential impact of growth on the village of Cuffley.</p> <p>The plan is not positively prepared, justified or consistent with national policy because of the lack of sufficient infrastructure capacity and the relatively limited number of services and jobs.</p>		<p>The evidence suggests that the village of Cuffley has the capacity to accommodate growth in line with the settlement strategy (policy SP3), taking into account of the infrastructure needs arising from the allocation of development sites, the</p>

DLPPS no	Main issues	Changes sought	WHBC comment
			<p>extent and range of services and facilities within the village and the potential impact on the landscape and Green Belt (see the Infrastructure Delivery Plan and Sites Selection Background Paper).</p> <p>No change</p>
309	<p>The plan is not effective because there is a lack of clarity as to what ‘sustainable transport’ could mean (objective 6).</p>	<p>Change to read: <i>“To maximise the opportunities to travel by sustainable transport modes “through the construction of a borough-wide safe cycling and walking network linking homes, schools, stations and town centres”</i></p>	<p>This is addressed in the movement section of the plan.</p> <p>No change</p>
General comments			
609	<p>Sport England welcome borough-wide strategic objectives (3 and 9) which relate to delivering communities which are healthy and active and enhancing opportunities for and access to recreation.</p>		<p>Comment noted</p>
2112	<p>Historic England welcomes references to heritage issues and garden city principles but proposes a minor change to strategic objective 8</p>	<p>Delete the following words from strategic objective 8: <i>“where possible”</i></p>	<p>Where possible is a reflection of the extent of power that local authorities have to manage and affect change within conservation areas and other assets of historical significance.</p> <p>No change.</p>
2150	<p>Hertfordshire County Council states that the Local Plan would benefit from the inclusion of an objective that relates to the timely delivery of infrastructure given its importance in supporting growth.</p>		<p>Minor modification to strategic objective 2: <i>...“where it can be supported by the timely delivery of the appropriate infrastructure,</i></p>

Chapter 4 – Delivering Sustainable Development and Policy SP1

DLPPS no	Main issue	Changes sought	WHBC comment
174	<p>The sustainability principles included in SP1 could be enhanced</p> <p>The Plan is not effective because it fails to make reference to the importance of ensuring new development results in no net loss and a net gain in biodiversity (where possible).</p>	<p>Add a new bullet point above the existing bullet point 4: <i>'That new development will result in measurable no net loss and where possible net gain to biodiversity'</i></p>	<p>This is an overarching policy on the principles of sustainable development and refers to the protection of natural assets. The issue of ensuring new development does not result in a net loss of biodiversity is adequately covered by Policy SADM 16 and its supporting text. All planning applications will be determined in accordance with the policies in the Local Plan, unless material considerations indicate otherwise. Hence, no reason to repeat text in Policy SP1. No change</p>
1252	<p>The Plan is not positively prepared because new text should be added after the third bullet point to encourage higher densities on brownfield sites and in locations with the best transport links</p>	<p>Add the following text to bullet point 3 of SP1 <i>Development densities should be maximised on such sites, with parking and design standards relaxed to enable greater densities to be achieved.</i></p>	<p>Densities are covered in Policy SP9 which has indicated a density range of typically 30-50 dwellings makes provision for higher densities in accessible locations. The Parking Standards Supplementary Planning Document makes provision for varying standards across the borough dependent on their accessibility. No change</p>
3, 610	<p>SP1 is sound because it requires larger development to undertake health impact assessments</p>	<p>None Stated</p>	<p>Support welcomed</p>

DLPPS no	Main issue	Changes sought	WHBC comment
963, 1619	<p>The Plan has failed to consider other sources of housing to accommodate growth</p> <p>The Plan is not justified or consistent because para 4.4, should recognise the capacity of urban areas, other sources of previously developed land (PDL) and changes in permitted development rights (PDR) that should be reviewed. These could accommodate a greater % of growth.</p> <p>The Plan is not flexible and adaptable to deliver sustainable development</p> <p>The Plan is not consistent because it is not flexible and adaptable in its approach to deliver sustainable development. It should be regularly reviewed /amended.</p>	<p>Para 4.4 and review the capacity of urban areas/PDL, PDR in line with the current Government policies/regulations</p> <p>None Stated</p>	<p>All sources of housing land supply have been assessed.</p> <p>The HELAA has assessed the suitability, availability and deliverability of urban capacity, and all the PDL/greenfield sites in the area, as well as their capacity for accommodating new housing development. A windfall allowance of 1315 dwellings has been included within the target (Policy SP2) and takes into account PDR. No change</p> <p>The plan contains a number of generic criteria based policies which will allow it to adapt to changing circumstances. The plan will be regularly monitored and reported on its performance in the Annual Monitoring Report. If the Plan is not meeting its targets or there is a change in circumstances that will trigger the need for a review in line with the national guidelines, (Para 153/157, NPPF). No Change</p>
1619	<p>The Plan is not justified or consistent because Para 4.3 is contrary to the NPPF (.i.e. footnote 9 of para 14), as it fails to refer to the Green Belt as a constraint for growth.</p>	<p>Insert "Green Belt Constraints" after the word recognises in Para 4.3</p>	<p>The policy makes specific reference to the Green Belt as a constraint. There is no need to repeat the reference in paragraph 4.3. No change</p>

DLPPS no	Main issue	Changes sought	WHBC comment
2070	<p>Bullet point 4 relates to heritage issues and the word heritage assets should be replaced with the word historic environment because this encompasses all aspects of heritage</p>	<p>Replace the words, heritage assets with historic environment.</p>	<p>Policy SADM 15/supporting text already emphasise the importance of ensuring potential proposals do not adversely impact the wider historic environment and will ensure that this is given adequate weight in any planning decisions. It is more important for SP1 to emphasise the importance of heritage assets as it is an overarching objective/policy for the Plan. No change</p>
231, 461, 573, 963	<p>The Plan is not delivering sustainable development</p> <p>The Plan is not consistent, justified and sustainable. The main reasons are it is increasing the number of houses by 25% in a water stress area.</p> <p>Also the scale of the growth proposed on greenfield sites will have a negative impact on the ecology, transport and wellbeing of the area.</p>	<p>Reduce the number of planned new homes and offices.</p> <p>Do not include any planned development in the Green Belt.</p>	<p>A change seeking a reduction in the planned number of new homes relates to the target and the settlement strategy. Please see section SP2 Targets for Growth.</p> <p>Affinity Water have not raised any objection to the level of growth and the Hertfordshire Water Study has not identified any supply issues for this quantum of growth over the plan period.</p> <p>A comprehensive, robust site selection process has been undertaken, to identify the most suitable and sustainable sites/locations taking into account impacts on transport ecology and wellbeing. No change.</p>
448, 1429	<p>The proposed level of growth will adversely impact the existing capacity of the infrastructure</p>	<p>None Stated</p>	

DLPPS no	Main issue	Changes sought	WHBC comment
	<p>The Plan is not justified, consistent, effective or positively prepared because the Plan will not deliver sustainable development. The existing infrastructure (transport, schools, health care, etc.) has insufficient capacity to accommodate growth and it is uncertain whether additional provisions/improvements will be secured/delivered to accommodate growth to address this. Also the cumulative impact of proposals in neighbouring authorities has not been considered.</p>		<p>This relates to the quantum of growth and the provision for infrastructure rather than the content of this policy. Please see section SP2 Targets for Growth and SP13 Infrastructure Delivery and the Local Plan's infrastructure Delivery Plan. The Infrastructure Delivery Plan considers cumulative impact and what infrastructure will be required.</p> <p>No change</p>
1099, 2070	<p>The Plan is failing to meet the full OAN and will not deliver sustainable development</p> <p>The Plan is not justified, consistent, effective or positively prepared because it is failing to meet the full OAN that are likely to increase as a result of the updated 2014 household projections. It is unclear why no work has been undertaken to identify or address any unmet needs of the HMA. Also the proposed windfall allowance of 1315 dwellings is not justified, as a number of alternative sites exist (e.g. HAT 2 and Potterells Farm) that are deliverable should have been considered and allocated.</p>	<p>Housing target should be increased to 13,100. Site Hat 2 should be allocated for 1100 new (1-5 yrs.) dwellings (SP2). Also Potterells Farm site should be allocated</p>	<p>This relates to the quantum of growth, the approach to selecting sites and the settlement strategy, rather than the content of Policy SP1. Please see sections SP2 Targets for Growth, SADM 26: New Dwellings in Hatfield and SADM 30: Housing Allocations in Welham Green.</p> <p>No change</p>
1874	<p>The Plan is not justified, consistent, effective or positively prepared because the spatial distribution and allocations of housing sites does not deliver sustainable patterns of development and a high reliance is placed on large strategic sites (e.g.</p>	<p>Allocate sites BrP1 and BrP12</p>	<p>This relates to the approach to selecting sites and the settlement strategy rather than the content of Policy SP1. Please see sections SP3: Settlement Strategy and Green Belt Boundaries, along with</p>

DLPPS no	Main issue	Changes sought	WHBC comment
24, 231, 448, 862, 900, 1099	<p>SDS5/HAT1, SDS6/HAT15 and SDS2/WGC5) that are not suitable locations. It has failed to allocate sites that are suitable, available and achievable.</p> <p>The proposed allocated for 1130 dwellings at Symondshyde (SDS6) is not sustainable</p> <p>The Plan is not justified, consistent, effective or positively prepared because the proposed new village at Symondshyde is located in an isolated, open countryside location of the Green Belt and is unlikely to encourage the use of or the viable provision of sustainable mode of transport. Hence, other sites (.i.e. HAT2) that are more suitable and deliverable, should have been considered (via SA) against site SDS6 and allocated.</p>	<p>Remove the proposed SDS6 site, rebase the housing needs and engage with NHDC as to possible development opportunities.</p> <p>Allocate HAT 2 for 1100 dwellings in 1-5yrs</p>	<p>SADM 31 Housing Allocations in Brookman Park.</p> <p>A large range of sites of varying sizes have been allocated in and around the most sustainable settlements. The site specific issues have been addressed in comments for SADM 31 and other policies. No change.</p> <p>This relates to the quantum of growth, the approach to selecting sites, encouraging sustainable transport and delivering infrastructure, rather than the content of Policy SP1. Please see sections SP24: New Settlement at Symondshyde, SP4, Transport and Travel, SADM 3: Sustainable Travel for all, SP13: Infrastructure Delivery and SADM26 New Dwellings in Hatfield.</p> <p>No change.</p>
448, 231, 1874	<p>The scale of proposed growth/site allocations within the Green Belt are not sustainable and justified by exceptional circumstances</p> <p>The Plan is not justified, consistent, effective or positively prepared because the level of growth has not given proper consideration to Green Belt constraints (para 14, NPPF). There are no exceptional circumstances for building over 50% of new homes within this designation, without</p>	<p>Reduce the number of planned new homes and offices.</p> <p>Do not include any planned development in the Green Belt.</p>	<p>A change seeking a reduction in the planned number of new homes relates to the scale of growth, the approach to selecting sites and the settlement strategy, rather than the content of Policy SP1.</p> <p>Please see sections SP2: Targets for Growth, SP3: Settlement Strategy and Green Belt Boundaries, along with SADM 34: Development in the Green Belt.</p>

DLPPS no	Main issue	Changes sought	WHBC comment
	<p>prioritising the use of brownfield sites for development. Also cumulative effects of proposals in neighbouring authorities need to be considered.</p> <p>The Plan is not justified, consistent, effective or positively prepared because the allocated sites are; located in the open countryside of rural locations, disconnected from existing settlement and beyond strong/permanent boundaries of the GB and are not suitable or sustainable (e.g. HS22/BrP4 and HS11/HAT11)</p>	<p>Allocate sites BrP1 and BrP12</p>	<p>A Green Belt Review has assessed how specific sites/locations contribute to the purposes of the Green Belt and its openness. The Council considers that there are exceptional circumstances which warrant a review of Green Belt boundaries.</p> <p>In line with the duty to cooperate, the Council has consulted neighbouring authorities, the County Council and other Duty to Cooperate bodies to ensure that any cross boundary issues are addressed.</p> <p>No change.</p> <p>This relates to the approach for selecting sites and the settlement strategy, rather than the content of Policy SP1.</p> <p>Please see sections SP3: Settlement Strategy and Green Belt Boundaries, along with SADM 34: Development in the Green Belt, along with SADM 31 Housing Allocations in Brookman Park.</p> <p>No change.</p>
24, 918	The Local Plan is failing to protect the environment		This relates to the location of new development, reducing the need to

DLPPS no	Main issue	Changes sought	WHBC comment
	<p>The Plan is not justified, positively prepared because it has failed to include strong policies to protect the environment and reduce inequalities in society</p>	<p>Encourage the increased use of sustainable modes of transport and reduce the carbon footprint of homes</p>	<p>travel and promoting sustainable modes of transport, as well as encouraging the sustainable use of resources in new developments; rather than the content of Policy SP 1.</p> <p>Please see sections SP 4, Transport and Travel, SADM 3: Sustainable Travel for all, SADM 13: Sustainability Requirements, and SP10: Sustainable design and Construction.</p> <p>No change.</p>
24, 935	<p>The Plan has failed to encourage the provision of low carbon/renewable energy on strategic sites/other locations and its policies are not positive enough to support this</p> <p>The Plan is not consistent because no assessment has been undertaken for the sustainability of Symondshyde village in terms of its heating/power, nor a requirement for enhanced eco-friendly building standards for new homes</p>	<p>New/existing buildings should be constructed or retrofitted to the highest possible standards, to reduce their environmental impact</p>	<p>This relates to the new settlement at Symondshyde, the sustainability of new buildings rather than the content of Policy SP 1.</p> <p>Please see sections SP 10 Sustainable design and construction, SADM 13 Sustainability Requirements, SP 24: New Village at Symondshyde and SADM 35.</p> <p>No change.</p>
875, 1770	<p>The Plan is not consistent or effective because no policy has been included to encourage/determine proposals for low carbon/ renewable energy systems (i.e. Anaerobic Digestion Plants) to address climate change. These are usually sited in the Green Belt surrounding villages, rural area or in around urban areas. Concerned that policy SP3 & the supporting</p>	<p>Include reference to para 91(NPPF) to make it clear that renewable energy projects may be inappropriate in the GB, unless special</p>	<p>It is not necessary to include a policy to cover every type of land use or to repeat national policy. Policy SADM34 and national policy provide an appropriate basis for determining</p>

DLPPS no	Main issue	Changes sought	WHBC comment
	text of SP1 could be used to prevent this type of development, as no reference of para 91 (NPPF) has been included.	circumstances are demonstrated	applications for renewable energy in the Green Belt. No change.
1874, 1911	<p>The Strategy of restricting housing growth at Welham Green will increase commuting patterns and is unsustainable</p> <p>The Plan is not justified, consistent, effective or positively prepared because new housing is restricted to site SDS7 due to a lack of school capacity, even though it's an inappropriate location, its deliverability is uncertain and it will fail to address the full OAN of Welham Green (.i.e.363-387 dwellings).</p> <p>The plan has failed to consider/ allocate a sufficient number of housing sites (.i.e. WeG6, Bulls Lane; BRp12 Brookman Park; WEg15, Potterells Farm, SW of Station Rd) that are deliverable (.i.e. 1.5 yrs) and can deliver the supporting infrastructure (.i.e. school), as well as address the unmet OAN.</p>	<p>Allocate sites BrP1 and BrP12</p> <p>Delete policy SDS7 and allocated WeG6 (Bull Lane) for 75 units</p>	<p>This relates to the approach for selecting sites and the settlement strategy, rather than the content of Policy SP1.</p> <p>Please see sections SP3: Settlement Strategy and Green Belt Boundaries, along with SADM 34: Development in the Green Belt, SADM 31 Housing Allocations in Brookman Park and SADM 30: Housing Allocations in Welham Green.</p> <p>No change.</p>
1874, 2070	<p>The Plan is not justified, consistent, effective or positively prepared because the growth strategy for Welham Green is not sustainable. A high level of employment development has been proposed and is not supported by a sufficient level of housing growth, which raises issues of self-containment. Therefore WeG15-Potterells farm site (SW, Station Rd) should be allocated. This will help reduce the proportion of development that need to be accommodated in less</p>	<p>Allocate the Potterells farm site for 140 dwellings</p>	<p>This relates to the approach for selecting sites and the settlement strategy (.i.e. distribution of growth and type), rather than the content of Policy SP1.</p> <p>Please see sections SP2 Targets for Growth, SP3: Settlement Strategy and Green Belt Boundaries, SADM 30: Housing Allocations in Welham Green</p>

DLPPS no	Main issue	Changes sought	WHBC comment
	sustainable smaller settlement in the hierarchy or isolated strategic sites or on windfall sites.		and SP 23: Marshmoor Policy Area, SADM 30 Welham Green. No change.
1113	The Plan is not justified, consistent, effective or positively prepared because it seeking to deliver a significant proportion of employment land on the Marshmoor site that is located away from the main town and is not deliverable. Also it is not seeking to fully meet the objective assessed employment land needs of 138k sq.m. by 22k sq.m.	Increase the employment floor space by 40k sq.m to a minimum of 156.4k sq.m.	This relates to the approach for selecting sites and the settlement strategy, rather than the content of Policy SP1. Please see sections; SP2 Targets for Growth, SP3: Settlement Strategy and Green Belt Boundaries, SP23: Marshmoor Policy Area and SADM30 Welham Green. No change.
1113	The Plan is not justified, consistent, effective or positively prepared because the Roehyde site (W of university of Hertfordshire and A1 (M), & N of Orbit Rd) should have been allocated to address the unmet employment needs. It has no highway safety/vehicular access or delivery issues. The Council should have worked with St.Albans Duty to Cooperate to bring it forward.	Allocate 40k sq.m. of the Roehyde site to deliver access off the A414 for science and logistics park and work with SADC under duty to cooperate to deliver another 40k sq.m.	This relates to the approach for selecting sites and the settlement strategy, rather than the content of Policy SP1. Please see sections; SP2 Targets for Growth, SP3: Settlement Strategy and Green Belt Boundaries, SP 23: Marshmoor Policy Area, SADM 30 Welham Green and SADM 33: Cuffley. No change.
1273	The Plan is not justified, consistent, effective or positively prepared because no assessment has been undertaken, to assess how the proposal for 400 dwellings may impact the water and sewerage	Assess how growth will impact the supply of water and sewerage infrastructure of	This relates to the approach for selecting sites, the settlement strategy and infrastructure

DLPPS no	Main issue	Changes sought	WHBC comment
	infrastructure of Cuffley/neighbouring areas, as well as how any potential impacts could be addressed	Cuffley/neighbouring areas needs	<p>Please see sections; SP2 Targets for Growth, SP3: Settlement Strategy and Green Belt Boundaries, SP13: Infrastructure Delivery,</p> <p>Key infrastructure providers such as Thames Water were consulted as part of developing the evidence base and matters such as the need for sewage network upgrades are taken into account in the delivery timescales (HELAA). No change.</p>
647	SP1 meets the four test of soundness and will support the delivery of site SDS2 that will reflect the sustainable development principles of this	None Stated	Support welcomed
3, 610	SP1 is sound because it requires larger development to undertake health impact assessments	None Stated	Support welcomed

Chapter 5 – How Much Growth and Policy SP2

DLPPS no.	Main issues	Changes sought	WHBC comment
21, 107, 684, 770, 775, 866, 887, 964, 1172, 1250, 1251, 1271, 1598, 1993, 2003, 2086	The Economic Strategy		
	There should be a clearer, more definite economic policy to link to housing development and regeneration.		The plan has a positive approach to both economic and housing growth and includes regeneration where this is appropriate. The SHMA also considers linkages between jobs growth/labour force supply and the need for housing. No change
	WH sits within the London-Stansted-Cambridge-Peterborough corridor. (London Plan 2.3).	Explore economic linkages with north London and emerging regional issues associated with land for industry and logistics.	The WH Economy Study sets out the strongest economic relationships which are reflected in the FEMA. Strongest relationships are with East Herts, St Albans, Luton, North Herts and Stevenage. The Hertfordshire Strategic Economic Plan identifies Welwyn Garden City and Hatfield within the A1(M) Growth Area. Welwyn Hatfield is not a member of the London Stansted Cambridge Consortium. No change
Plan is not (variously or not noted) positively prepared, justified, effective or consistent with national policy. No evidence to support jobs growth. It sets unreasonably over optimistic high employment targets. Plan envisages expansion beyond the needs of the local economy and assumes Green Belt land will be available.	Reduce the assessed need for employment Reduce the target for employment land Reduce the area set aside for businesses Reduce the impact on the Green Belt	Employment targets are informed by the WH Economy Study and updates. A significant amount of employment land has already been lost to residential use through PD rights, impacting on the borough's ability to maintain sufficient employment land to meet future jobs growth. Planning for	

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>How has the likely economic repercussions of Brexit been taken into account?</p> <p>Shortage of employment land too small to justify the SDSs, particularly Marshmoor (SDS7)</p> <p>Where will the workforce come from?</p> <p>Plan fails to recognise complex relationship between housing and jobs markets.</p> <p>Providing jobs for in-commuters is not a reasonable objective (at the expense of the Green Belt).</p> <p>Head office relocation to WGC treated as an assumption not a one-off</p> <p>Growth targets assume more distribution and transportation without a labour market assessment to support this.</p>	<p>New policy wording proposed. To include 290.2 hectares of employment land (not 294.1) and provision for 76,900 sq m of new floor space (not 116,400).</p> <p>Delete reference to Marshmoor SDS.</p> <p>Validate growth figures with specialist organisation</p>	<p>further losses of employment land is not a sustainable strategy and would not be positively prepared.</p> <p>The Plan explains that in order to maintain a sufficient level of employment land, additional employment areas have been allocated including two sites within the Green Belt.</p> <p>The relationship between jobs and homes is recognised and assessed in the evidence base (the SHMA).</p> <p>A workforce is formed of those already living in a borough, those who commute into a borough and those who choose to move (migrate) into the borough. Current commuting patterns are assumed to continue.</p> <p>Company relocations into and out of the borough are a normal part of employment churn.</p> <p>Both EEFM and Experian data (which inform the hybrid scenario in the Economy Study) draw upon labour market analysis.</p> <p>No change</p>
387	<p>WHBC is a member of the Hertfordshire LEP and its Plan should accord with the broad objectives of the SEP and a jobs-led scenario should be the basis for housing growth.</p>		<p>The Plan accords with the broad objectives of the SEP. Jobs-led scenarios have been considered in the evidence base (linking the Economy Study and the SHMA). No change.</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
1250	<p>Plan is sound. Jobs /employment projections seem reasonable. New allocations cater for B1 uses but evidence suggests significant demand for B8. Need to be able to deliver a mix of uses.</p> <p>If insufficient homes to meet the OAN, potential for creating an imbalance with more jobs than homes, thereby increasing in-commuting.</p> <p>Also potential for imbalance between jobs/homes where FOAN is not met, creating more jobs than homes and increasing in-commuting.</p> <p>Plan is sound but question ability to maintain and enhance employment density.</p>	<p>How will the Plan promote higher order employment uses such as science parks/R&D, etc. in preference to lower value activities?</p> <p>Consider whether additional employment floor space will match or outstrip economically active residents, so that employment density is maintained and ideally enhanced.</p>	<p>Consistent with paragraph 158 of the NPPF, the Council has integrated its assessment and strategies for employment and housing. There may be potential increased in-commuting if housing growth is unable to support the planned level of jobs growth.</p> <p>However, this is not an exact science and Policy SP2 allows for flexibility. Employment projections are liable to constant variation from one data set to the next. The Economy Study recommended a hybrid approach in light of different model outputs. The evidence from the Economy Study has then informed the SHMA and the OAN, which in turn has considered the need to provide sufficient homes in light of the need to maintain labour-force supply.</p> <p>The Plan will be able to respond to market demand for a mix of employment uses. Most sites allocated in Policy SADM10 are for a mix of B1, B2 and B8 uses. New strategic development sites are allocated for B1 because they are mixed use development sites and employment will be delivered alongside housing. The Plan (para 20.10) says that the preference for the Marshmoor Policy Area is for B1(b) related to life sciences.</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
1114	<p>Employment floor space target should be increased</p> <p>The plan is not positively prepared, justified or effective.</p> <p>Provision for employment floorspace falls 22,000 sq.m short of the objectively assessed need, showing that the plan was not positively prepared. (Land at Roehyde should be allocated for a science and logistics park - split between land in WH and land in St Albans under the DtC).</p>	<p>Amend Policy SP2. Increase floor space target by at least 40,000sqm (40,000 each in WH and St Albans, 80,000 in total) to a minimum of 156,400sqm in WH.</p> <p>Allocate a cross-boundary site for a science & logistics park</p>	<p>Provisional government estimates (para 5.5 of the Plan) indicate that since 2013, the number of jobs in the borough has grown to the extent that 116,400 sq.m should be sufficient to meet the level of job growth indicated in the Economy Study. Accordingly, 294.1 hectares of land has been identified to maintain a sufficient land supply. It is not considered necessary to allocate additional land for employment. (The Roehyde site has featured in DtC discussions between WHBC and SADC. Both Councils are in agreement that there is no evidence leading to a conclusion to support the allocation of the site). The site was found unsuitable in the WHBC HELAA.</p> <p>No change</p>
Housing	Housing Market Geography		
665, 947, 1598, 1988,	<p>Housing market geography is tight. Inter-relationships with north London underscore need for collaboration and the DtC.</p>		<p>The HMA is identified with both a wider and a defined geography to reflect the strongest relationships. The London Boroughs of Barnet and Enfield have been invited to be involved in the SHMA from the early stages of the SHMA and thereafter.</p> <p>No change</p>
	<p>Plan is sound but does the HMA work from a WH perspective but not from anyone else's? Luton and</p>		<p>The complexities of defining housing market areas in Hertfordshire (and</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>surrounding areas study places part of WH in the Stevenage HMA and part within the St Albans HMA. However, WH is a finely balanced area and boundaries may be defined in different ways, and accept that HMAs may overlap.</p> <p>Important matter is any unmet need within HMA. Stevenage HMA covers 52% of the population of WH.</p> <p>North Herts has not been formally approached by WH to accommodate any shortfall in WH. No additional capacity currently exists.</p>		<p>surrounding areas) has been considered in various technical meetings/work and at DtC meetings. Subsequent to the WH SHMA 2014, many surrounding LAs carried out new SHMAs and, on a 'best fit' whole local authority basis, none concluded that Welwyn Hatfield falls wholly within another HMA. Surrounding SHMAs do acknowledge cross- boundary relationships with parts of Welwyn Hatfield and vis-versa but surrounding areas have stronger relationships with other areas.</p> <p>The matter of unmet need within the Stevenage HMA has been discussed at technical DtC meetings and in response to consultation on the North Herts Local Plan November 2016, WH stated that a review of any adopted Local Plan in North Herts should also acknowledge the identified and longer-term needs in the wider sub-regional area, including Welwyn Hatfield.</p> <p>It is understood that North Herts is unable at the present time to meet any shortfall arising in WH but early discussions have taken place around the need for both authorities to submit plans for examination, future reviews of plans and a willingness to work together to explore future options such as a new settlement. No change</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>The plan is not positively prepared, justified, effective or consistent with national policy</p> <p>Housing Market geography not based on a common methodology where cross-boundary relationships exist. 2014 and 2015 SHMA refer WH not included within any other HMA, even where strong relationships exist (St Albans). How will HMA issues be addressed in the future – through a review of the Plan and strategic approach to HMAs?</p>		<p>There is no one common methodology but liaison has taken place with authorities neighbouring WH when preparing SHMAs. Welwyn Hatfield has a complex set of relationships with other areas but these areas in turn have stronger market relationships with other areas.</p> <p>Welwyn Hatfield will continue to work with other authorities within the housing market area to explore opportunities to address the need for housing through future reviews of Plans. No change</p>
	<p>OAN – general comments</p>		
<p>665, 1598, 1869,</p>	<p>2012 SNPP is an appropriate starting point with adjustments for vacancy rates, household suppression and market signals.</p> <p>Evidence is proportionate and there is a clear need to progress the Plan in a timely fashion.</p> <p>Target meets the latest DCLG 2014 SNHP (631 p.a.) but would need adjustment to reach an OAN.</p> <p>SHMA October 2015 clearly argued and support many conclusions.</p> <p>London's poor delivery is not Welwyn Hatfield's responsibility but wise to consider implications of greater demand.</p> <p>Welcome the recognition of long term migration trends and outward migration from London.</p>	<p>Should consider latest 2014 SNHP</p>	<p>The SHMA has been carried out consistent with national PPG and has considered a range of scenarios and recognises the relationship with London.</p> <p>SHMA is being updated to take account of 2014 SHNPs. However, SHNPs will continue to be issued throughout the plan period and it is not proposed to delay submission of the Plan. Any implications arising from an updated OAN, will be considered at a future review of the Plan.</p> <p>The GLA has recently consulted on a SHLAA methodology and London's</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
			capacity to accommodate future growth will be examined thereafter. No change
	The OAN is too low		
1692, 1998	The plan is not (variously) positively prepared, justified, effective or consistent with national policy. OAN is too low. Alternative assessment submitted. Concludes an OAN of 1088 p.a. which takes account of LPEG recommendations and other indicators	Increase the OAN. to 1080 p.a. / 20,520 over the plan period.	The SHMA (2015 and 2016) indicates that the OAN is between 12,616 and 13,433 and has been completed consistent with national PPG. LPEG recommendations are not (yet) included within PPG and The White Paper indicates that consultation will take place soon on a single methodology. The Plan cannot be halted awaiting the outcome of this consultation but the SHMA is subject to review; taking into account more recent data sets including the 2014 based population and household projections. No change.
389, 1266, 1870	OAN needs to be higher to address need for affordable housing SHMA 2016 provides evidence to support a higher OAN	Increase the OAN	OAN takes into account the need for affordable housing. Case law has clarified (EWHC 2464 Admin – Kings Lynn BC) that neither the NPPF nor the NPPG suggest affordable housing needs have to be met in full when determining the OAN. The SHMA is subject to review and considers the need for an uplift in response to affordability signals. No change

DLPPS no.	Main issues	Changes sought	WHBC comment
1087, 1100, 1222, 1225, 1227, 1230, 1233, 1458, 1753, 1869	<p>The plan is not (variously) positively prepared, justified, effective or consistent with national policy</p> <p>OAN does not take account of latest data including 2014 SNHPs;</p> <p>OAN could be 15% higher.</p> <p>SHMA provides the evidence for a higher OAN</p>	Consider the 2014 based SNHPs and review the OAN	<p>The SHMA is subject to review; taking into account more up to date data including the 2014-based population and household projections. However, SNHPs will continue to be issued throughout the plan period and it is considered important to progress with submitting the Plan for examination at the earliest opportunity in order for the Council to have an up to date adopted plan for the borough. Any shortfall in housing as a result of any revised OAN, will be taken into account through future reviews of Plans.</p> <p>No change</p>
	The OAN is too high		
21, 107, 227, 228, 229, 232, 301, 418, 423, 424, 443, 471, 474, 489, 580, 630, 709, 775, 780, 887, 919, 947, 1034, 1041, 1088, 1096, 1172, 1180, 1197, 1271, 1251, 1301, 1443, 1458, 1483,	<p>The plan is unsound because (variously) it is not positively prepared, justified, effective or consistent with national policy</p> <p>The OAN is too high – based on false assumptions, fails to take account of one-off historic events (development of Hatfield Aerodrome/BAE site and historic growth in student numbers) which skews projections.</p> <p>Assumes same growth will continue in the future</p> <p>No allowance for future RVC expansion plans for student accommodation.</p>	<p>Professionally scrutinise the OAN Review the OAN</p> <p>Reduce the OAN</p>	<p>The OAN has been assessed by independent specialist (demographic and housing) consultants. It has been reviewed on numerous occasions to take account of the latest data and to consider responses to consultation at the LPC 2015 stage. A further review will provide further updates.</p> <p>Representations are not supported by evidence to justify what an alternative OAN might be.</p> <p>Demographic modelling explains how the student population is accounted for within ONS data and the SHMA</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
1506, 1521, 1687, 1740, 1753, 1822, 1828, 1834, 1897, 1922, 1929, 2086, 2108,	<p>OAN is too high. It is inflated and exceeds population/household projections, which are over-estimated/false/based on assumptions. If OAN proves to be wrong, no way of mitigating this.</p> <p>How is the OAN of 10,000 (thrown out by High Court) reconciled to current OAN?</p> <p>25% growth is too large and disproportionate compared to surrounding areas.</p> <p>Brexit vote - may change future growth projections, e.g. migration rates</p> <p>Economic projections that inform the OAN not justified. Likely to slow down.</p> <p>Target is based on increased employment growth but takes no account of constraints. It appears to result from the LEP's non-statutory SEP. Have working patterns, e.g. working from home, been factored in to the OAN?</p> <p>Market signals questionable.</p> <p>Risk of double counting within the OAN with other authorities</p>	OAN should be reviewed post-Brexit vote	<p>considers the housing needs of students. No change</p> <p>The OAN follows the guidance in NPPG. It exceeds the baseline demographic projections because it makes adjustments to reflect market signals, affordability and economic indicators. Assumptions and estimates are examined by the Council's independent specialist consultants.</p> <p>The (quashed) RSS target of 10,000 for WH was not an OAN.</p> <p>The terms of Brexit have not yet been negotiated or agreed and future implications for migration are uncertain. The 2014 based SNPP assumes that net inflows will reduce by 44%, which is taken into account in the 2017 SHMA update.</p> <p>The Economy Study considers economic projections and working from home rates. The Economy Study has informed the SHMA, which derives the OAN.</p> <p>Market signal adjustments are consistent with the guidance in NPPG and recent Inspector reports.</p> <p>The OAN does not include double counting with other areas.</p> <p>No change</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>Hertsmere's OAN is significantly lower than WH and yet has similar Green Belt constraints</p>	<p>Review why HBC's OAN differs so fundamentally WH's</p>	<p>OANs are 'policy off, hence they are not influenced by policy constraints (whereas targets may be). Hertsmere's adopted Core Strategy was informed by targets in the (now cancelled) East of England Regional Plan. HBC has subsequently carried out a joint SHMA with other LAs. The methodology used in the SW Herts SHMA is consistent with NPPG. The OAN for HBC is 8,985. This will inform the review of the HBC Core Strategy, which has recently commenced.</p> <p>No change</p>
	<p>OAN should be balanced against Green Belt restraint.</p>		<p>OANs are 'policy off, hence they are objective and are not influenced by policy constraints. The target may be and has been considered in the context of Green Belt constraints.</p> <p>No change</p>
	<p>Unmet need from WH and within the HMA</p>		
<p>114, 226, 665, 709, 1034, 1869, 1875, 1912, 1955, 2071</p>	<p>The plan is not (variously) positively prepared, justified, effective or consistent with national policy.</p> <p>Council has not demonstrated how the shortfall/unmet need will be met. Must do more either through the DtC or release more land from the Green Belt.</p> <p>Expansion of Brookmans Park, Digswell, Cuffley, Welwyn and Welham Green should be considered.</p>	<p>Increase target to 13,433 in line with the SHMA.</p> <p>Allocate additional sites that could be delivered in the first 5 years of the plan period.</p> <p>Provide evidence that it has satisfied the DtC with regards to helping</p>	<p>There are no opportunities at the current time to make good the shortfall between the target and the OAN. However, WHBC will continue to work with other authorities neighbouring WH to explore the opportunities through a future review of plans.</p> <p>Development to the east of WGC within East Herts will contribute towards the housing target for East</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>Council has stated that no surrounding authority will be able to take any of WHBC needs.</p> <p>Other areas are not meeting their need.</p> <p>Unmet need from other areas within the HMA has not been considered</p> <p>Cross-boundary need is unknown – only 3 Herts LPAs have adopted Core Strategies.</p> <p>Insufficient co-operation with adjoining councils on growth figures.</p> <p>No clear communication of outcomes from DtC discussions.</p> <p>Unclear if WH has failed to agree that East Herts will meet its shortfall and yet it supports development in East Herts.</p>	<p>to meet identified need from neighbouring authorities.</p> <p>Review the OAN taking account of need in other areas.</p> <p>Publish its Statement of Compliance, identifying strategic matters that need to be addressed and all that has been done to resolve through cooperation.</p>	<p>Herts but also falls within the WH HMA.</p> <p>The 2014 SHMA did consider the need for housing within the defined HMA. The SHMA is subject to review to consider latest data.</p> <p>The Council will need to demonstrate that at the point of submission the Duty to Co-operate test has been met. This means that it is appropriate to continue with Duty to Co-operate meetings and other activity to secure agreed statements with adjoining authorities and other relevant Duty to Co-operate bodies on the content of the Plan and in response to representations received. No change.</p>
	The Housing Target - General		
1220, 1886, 2122	<p>Support proposal to deliver at least 12,000 homes. SP2 is consistent with national policy, meeting the need for housing with appropriate Green Belt boundary amendments.</p>		<p>Noted</p> <p>No change</p>
648	<p>Plan is sound. Support Policy SP2, including specific delivery of around 1,350 dwellings to the east of WGC in East Herts.</p>		<p>Noted</p> <p>No change</p>
1992	<p>The plan is sound but WHBC should assure itself it has explored all options given the shortfall against the OAN of 13,433. Most sites assessed as suitable, available and deliverable have been allocated. Some SHLAA tests are stringent. Employment evidence is justified but should the need to meet the OAN</p>		<p>Broad locations and sites have been considered since 2007, within urban and non-urban areas.</p> <p>The need to protect employment land within designated employment areas is informed by the evidence base.</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>outweigh protection of employment land in certain circumstances (para 22 of NPPF and avoiding long term protection if unlikely to be brought into use)?</p>		<p>Employment land outside employment areas is not limited to employment uses.</p> <p>The SHLAA (HELAA) is not considered to be stringent; it is thorough.</p> <p>No change.</p>
<p>1046, 1607, 1869</p>	<p>Accept that the FOAN may not be achievable, consistent with the NPPF (paragraphs 47 and 14) and support the target of 12,100 provided shortfall is met.</p> <p>Target of 12,000 appears sufficient to meet needs, reflecting 2015 SHMA update based on 2012 based SNHP.</p> <p>Target represents an uplift of 10% on the official demographic starting point. Reassuring boost in housing supply (although 1,433 short of the OAN).</p>	<p>Identify sites to meet the shortfall either increase capacity, find additional site within WH or the HMA.</p> <p>The OAN should be placed in main body of text and SP2.</p> <p>Amend supporting text to clarify site capacities are indicative and may vary slightly (up or down) consistent with</p>	<p>There are no opportunities at the current time to make good the shortfall between the target and the OAN. However, WHBC will continue to work with other authorities proximate to WH to explore the opportunities through a future review of plans.</p> <p>The OAN is found in the evidence base that informs plan preparation. It is not considered necessary to quote the OAN in policy. No change.</p> <p>The site capacities are explained in the HELAA. The Housing Sites Selection Background Paper makes it clear that site capacities may vary slightly (up or down) once planning applications are received.</p> <p>Minor Modification at the end of paragraph 6.7 to clarify that capacity on sites to be allocated reflects the evidence base but that once an application is received, final capacities may vary slightly.</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	Non-implementation rate is too low		
387, 1266	The plan is not positively prepared, justified, effective or consistent with national policy. Target includes a low non-implementation rate of 2.5%. Prospect of under-delivery appears substantial	10% non-implementation rate would be more realistic	The implementation rate reflects local evidence of low non-implementation rates on planning permissions. There is no locally relevant evidence that demonstrates that 10% is more realistic. No change
	Target is too low		
114, 116, 316, 387, 389, 478, 665, 668, 1087, 1100, 1146, 1217, 1222, 1225, 1227, 1230, 1233, 1266, 1583, 1692, 1722, 1274, 1721, 1753, 1858, 1864, 1869, 1875, 1912, 1950, 1955, 1998, 2071	The plan is not (variously) positively prepared, justified, effective or consistent with national policy. Target fails to meet the full OAN. Failure to boost housing supply. Unmet supply from 2011 to 2013 should be added to the target The housing target should be increased. Target will not address affordability issues (e.g. 1,734 dwellings p.a. would be required to address affordable housing delivery) Over-reliance on strategic sites. Other Green Belt sites (small, medium and strategic scale around towns, excluded villages and washed over villages) have been discounted which could make good the shortfall Deemed infrastructure constraints (which can be overcome) have been cited as a constraint on growth contrary to NPPG	Target should be increased. Provide a 20% buffer above the target Work more positively to allocate other sites, giving substantial weight to meeting the OAN. Policy SP2 should be amended with revised target of 13,100, 13,433 / 20,520. Increase housing target to 707 p.a. (15,554 from 2011 to 2033) Allocate additional suitable sites around the excluded and washed over villages and around Hatfield.	The target does not meet the OAN in full but it does represent an uplift above demographic projections and responds to market signals, economic projections and affordability. The target represents what the Council considers is a reasonable balance between objectively assessed needs and constraints. The Plan is informed by an extensive evidence base. WHBC is not proposing to remove the smaller 'washed-over' villages from the Green Belt as these contribute to the openness of the Green Belt. These are also less sustainable locations where limited infilling (SADM1 and SADM34) and small-scale affordable housing schemes (SP7) may be permitted, subject to meeting other policy requirements

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>Additional sites should be allocated (in or around Bell Bar, Brookmans Park, Digswell, Hatfield, Welham Green, Welwyn, at Stanborough).</p> <p>Take account of longer-term requirements</p> <p>Housing delivery after the plan period likely to be 900 d.p.a. due to shortfall within plan period.</p> <p>Additional land should be safeguarded for a further 20% (e.g. 4,100).</p> <p>Targets for certain settlements should be higher</p> <p>Increase in population would support local services.</p> <p>Policy reference to delivery in East Herts does not count towards the Welwyn Hatfield target.</p> <p>Significant disparity between target in first and second phase of the plan period.</p> <p>The stepped approach to delivery should be removed (need is now not later).</p> <p>Back-loading is not appropriate. Will not significantly boost housing supply.</p>	<p>Comply with paragraph 157 of NPPF to take account of longer term requirements.</p> <p>Additional land should be safeguarded for a 20% buffer (e.g. 4,100).</p> <p>Delete the stepped approach to delivery.</p> <p>Housing requirements should be met across the whole plan period.</p> <p>Phasing should be updated to reflect an updated spatial strategy to meet an uplift in the housing target.</p> <p>Delete the reference in Policy SP2 to delivery within East Herts to reflect the fact that only the housing provision within Welwyn Hatfield's own area will be counted towards meeting the councils housing need.</p>	<p>The Plan and the housing target commence at 2013, commensurate with the assessed need.</p> <p>The SHMA considers the need for affordable housing and affordability. However, case law has clarified (EWHC 2464 Admin – Kings Lynn BC) that neither the NPPF nor the NPPG suggest affordable housing needs have to be met in full when determining the OAN.</p> <p>Site selection has been informed by the HELAA and the Housing Sites Selection Background Paper.</p> <p>The OAN is being reviewed to take account of more up to date projections but it is not proposed to delay submission of the plan for examination.</p> <p>The stepped approach to delivering the target reflects the estimated delivery rates as shown in the trajectory (Figure 17 of the Plan) and the need to monitor and maintain a 5 YLS.</p> <p>Policy SP2 is clear that development in East Herts will meet the need for housing within both East Herts and the Welwyn Hatfield HMA. (It does not contribute towards the Welwyn Hatfield housing target).</p> <p>No change.</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
665	<p>Housing target will not support local economic objectives</p> <p>The Economy Study (2014) identified that 625 homes p.a. (12,500 over plan period) are necessary to support 12,000 jobs. Policy SP2 has a strategy to deliver 16,900 jobs but 12,000 homes will not support that objective. Either the economy will be constrained or more in-commuting and congestion.</p>		<p>The Economy Study 2014 reached no conclusion about the number of homes required to support jobs growth in the borough. This was considered in the SHMA (various iterations).</p> <p>Recent analysis indicates that 12,000 additional homes will be sufficient to provide the labour force to support between 15,730 and 17,360 additional jobs over the plan period. The strategy for 16,900 jobs falls within this range and given the variability of economic forecasting, this is considered to represent a reasonable balance between jobs and homes. No change</p>
	Target is too high		
424, 449, 630, 684, 770, 775, 887, 1011, 1034, 1070, 1096, 1172, 1271, 1379, 1391, 1524, 1960, 2086	<p>The plan is not (variously) positively prepared, justified, effective or consistent with national policy.</p> <p>Housing figure should be in line with that in the Emerging Core Strategy 2012.</p> <p>Housing figure should be for no more than 10,906 (or lower)</p> <p>No explanation why target increased from 6,800/7,200/7,500 to 12,500 in 2015 and now 12,000/13,000.</p> <p>Targets are unjustifiable.</p>	<p>Have regard to economic, environmental and infrastructure constraints.</p> <p>Reduce target.</p> <p>Target should relate to demographic scenario rather than economic growth</p> <p>Reduce target to ECS levels</p>	<p>The current target is informed by an up to date SHMA. The ECS draft target is now superseded.</p> <p>To return to an earlier (emerging) target of 6,800/7,200 would result in a significant shortfall below the OAN, which is consistent with NPPG and informed by more recent population and household projections.</p> <p>The 2012 Emerging Core Strategy target would not represent the type of step change now expected by the government, equating to an annual</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>Housing target is based on unrealistically high economic growth targets.</p> <p>Insufficient account of infrastructure to support level of growth and conflicts with national policy – Green Belt</p> <p>Target represents an uplift on demographic projections.</p> <p>Target appears to be based on questionable market signals and high employment growth.</p> <p>Shortfall against the OAN does not justify a target that results in loss of Green Belt.</p> <p>Housing target and rate of development should be subject to review within 5 years of adoption.</p>	<p>Reduce target to 10,906 (or lower)</p> <p>New policy wording suggested: housing target of 10,300 (not 12,000), average rate of 542 p.a.</p> <p>Review the plan within 5 years of adoption</p>	<p>average of 358 dpa, over the plan period, which is lower than previous average dwelling delivery of 412 dpa (footnote 18, page 38 of the Draft Local Plan).</p> <p>The target is considered to represent an appropriate balance between the need for growth and constraints. It takes account of a sound evidence base around economic projections. The housing target is aligned with the lower end of the economic projections. The shortfall without releasing Green Belt sites is significant and justified.</p> <p>No change</p>
	<p>Plan period should be amended</p>		
<p>1087, 1869, 1875</p>	<p>Plan period should run for 22 years from 2011-2033</p> <p>Plan period should run for 20 years, ending in 2033</p>	<p>Target should be 15,554 (from 2011-2033), 707 p.a.</p>	<p>There is no requirement for a 20 year plan period.</p> <p>NPPF (para. 57) states that local plans should be drawn up for an appropriate time scale, preferably 15 years), taking account of longer term requirements.</p> <p>The Plan period and the housing target commence at 2013, commensurate with assessed need.</p> <p>No change</p>
	<p>5 year land supply</p>		
<p>114, 1583, 1722, 1936, 1997,</p>	<p>The plan is not positively prepared, justified, effective or consistent with national policy</p>	<p>The Sedgefield method should be used to make</p>	<p>The 2015/16 AMR (and subsequent AMR's) has employed the Sedgefield methodology. (Table note 1, page 34)</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>Council has used the Liverpool method to meet the backlog over the plan period. (Important if the low OAN figure of 498 is being used)</p> <p>Contest delivery on a number of sites and the Council's 5 YLS position (components challenged – completion rates on SDS, lead-in times and level of windfall). Evidence suggests that delivery on large sites will average 70 p.a. Smaller sites might deliver 35-50 pa. Completion rates above 100 p.a. are contended.</p> <p>Council will not have a 5 YLS in the early to middle period of the plan.</p>	<p>up the backlog over the first 5 years</p>	<p>498 is not an OAN figure. 498 is the averaged target in the Draft Local Plan from 2013/14 to 2021/22.</p> <p>The former Hatfield Aerodrome site delivered 2,188 dwellings between 2001/2 and 2011/12. Delivery reached 548 in 2003/04, 386 in 2005/06, 265 in 2006/07, 221 in 2004/05, 195 in 2002/03. Local evidence demonstrates that delivery rates can be higher than 70 p.a. for large sites.</p> <p>The Council currently has a land supply of 5.03 years. (2015/2016 AMR). This position is estimated to improve with peak years for delivery towards the middle of the plan period.</p> <p>No change</p>
	<p>5 year land supply is taken from 2017/18 to 2021/22</p>	<p>5 year land supply should be taken from 2016 to 2021 (the date of the latest evidence)</p>	<p>The plan is scheduled for adoption in 2017.</p> <p>No change</p>
	<p>Planned growth is unachievable</p>		
<p>340, 387, 478, 489, 665, 684, 1583, 1722, 1875, 1950, 1997, 1886, 1869, 1828</p>	<p>The plan is not (variously or not noted) positively prepared, justified, effective or consistent with national policy</p> <p>Housebuilding industry ill-equipped to increase substantially the rate of building.</p> <p>More evidence required to support proposed completion rates and lead-in times in the trajectory.</p> <p>HBF research 2016 indicates limited, e.g. 70 sales p.a. on sites of 350+. Colin Buchanan work suggests</p>	<p>Include small and medium sized Green Belt sites which can be delivered quickly and contribute to the 5YLS without compromising the overall strategy.</p>	<p>The HELAA sets out the availability and anticipated delivery of sites informed by landowner/promoter information.</p> <p>Local evidence demonstrates that delivery rates can be higher than 70 p.a. for large sites. The former Hatfield Aerodrome site delivered 2,188 dwellings between 2001/2 and</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>delivery averages 188 a year on sites of 1,000 +. Savills work, suggests 120 p.a. at urban extensions. Timescale between outline submission and completions averages 3 yrs.</p> <p>Welwyn Hatfield has a strong housing market but strategic sites will be competing at the same time. The SDS are complex, none are under the control of a housebuilder. Assumed delivery rate for SDS is twice the national average.</p> <p>Over-reliance on strategic sites which have associated infrastructure burdens, are not in sustainable locations and may not be deliverable.</p>		<p>2011/12. Delivery reached 548 in 2003/04, 386 in 2005/06, 265 in 2006/07, 221 in 2004/05, 195 in 2002/03.</p> <p>The Plan includes a number of Strategic Development Sites and a number of small and medium sized sites. The plan is reliant upon the combination of all these sites coming forward for development in order to meet the target. No change.</p>
114, 424	<p>Draft plan is already behind its own targets. If current under-delivery persists, there would be a shortfall of 2,305 dwelling against the trajectory.</p>	<p>Remove Green Belt sites around villages and revisit proposal to build a garden village further north in Hertfordshire.</p>	<p>If Green Belt sites around villages were removed from the Plan now, then a significant shortfall against the OAN would arise. The excluded villages are considered to be sustainable locations for a limited level of growth consistent with the settlement hierarchy.</p> <p>No change.</p> <p>Discussions have taken place and will continue to take place with other authorities around longer term delivery options.</p>
449, 1096, 1271, 1945	<p>The plan is not justified or consistent with national policy.</p> <p>If 12,000 homes are built, infrastructure will not cope</p>		<p>Representation not supported by evidence to demonstrate that infrastructure will not cope. The Council has worked with infrastructure providers and considers the target is deliverable.</p> <p>No change</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	Windfall allowance		
387, 684, 1271, 1875, 1997	<p>Windfall allowance requires greater scrutiny. Certain components of the windfall evidence are contended. e.g. Hasn't accounted for office to residential conversions.</p> <p>Reliance on agricultural and rural areas is unsound, as is conversion rates from offices, community facilities, education, public houses, residential redevelopment, retail, additional allowance, Hatfield Town Centre.</p> <p>Inappropriate to plan for windfall over the lifetime of the Plan.</p> <p>Double counting of windfall sites with unidentified sites in urban areas in the supply table.</p>	Windfall completions should reduce by 34 p.a. in accordance with the Framework	<p>Council is content that its evidence is robust. (Windfall dealt with in policy SADM1).</p> <p>No change</p>
	5% or 20% buffer		
	<p>The plan is unsound because it is not positively prepared, justified, effective or consistent with national policy</p> <p>Whilst the council over-delivered against previous Structure Plan targets, it has persistently under-delivered against its projected housing need. A 20% buffer should be applied in accordance with 47 of the NPPF</p>		<p>Table note 2 (page 34) of the 2015/16 AMR, notes: <i>"The NPPF requires either a 5% or 20% buffer to be added depending on whether an area has seen 'persistent under-delivery' of housing. Because the 2005 District Plan housing target was comfortably exceeded and the 2012 Emerging Core Strategy target would also now be being exceeded, it is not considered that there has been 'persistent' under-delivery and a 5% buffer is therefore appropriate."</i></p> <p>No change</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
	Urban capacity		
471, 631, 684	<p>Plan is not justified or consistent with national policy.</p> <p>Urban capacity is under-estimated.</p> <p>No consideration given to the conversion of employment land to residential, residential intensification, taller buildings and residential within retail/service areas, release of HMOs due to the building of more student accommodation.</p>	<p>Re-assess urban capacity with a deliberate regeneration strategy to give high priority to the NPPF Green Belt purpose of assisting urban regeneration.</p> <p>Incorporate findings into the plan, making reductions in green field Green Belt land take.</p>	<p>The HELAA sets out the assessed capacity of sites with higher densities in appropriate locations. Sites are identified for regeneration and sites are identified in local and town centres. Employment land is retained where the evidence indicates this is necessary to ensure that WH can respond positively to economic growth in a challenging environment where office to residential PD has already eroded supply in employment areas. The HELAA is a thorough assessment of urban and other capacity.</p> <p>No change</p>
	The option of a new town		
1642, 1867, 2003	<p>Build a new town/village/Garden City away from existing towns/villages, not on Green Belt land, to meet the target</p> <p>Acknowledge a new Garden City is not deliverable in the short term but should be pursued.</p>		<p>No site or proposal of sufficient size and scale is available to deliver a new town within the borough. .</p> <p>Discussions have taken place with other authorities around longer term delivery options (HIPP and DtC) however, it is too early to indicate what the potential outcomes are likely to be. North Herts DC includes in its proposed Submission Plan a policy (SP8) commitment to identify new settlement options for additional housing supply after 2026. WH will continue to work with NHDC to explore</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
			<p>the potential for a new settlement which may be able to take account of longer term unmet housing needs in Welwyn Hatfield.</p> <p>No change</p>
Retail	Retail growth targets are not realistic		
<p>107, 684, 866, 887, 1088, 1251, 1271 2003</p>	<p>The plan is unsound because it is not (variously) positively prepared, justified, effective or consistent with national policy</p> <p>Unreasonably high retail targets.</p> <p>Significant high levels of under-utilisation with 50% charity/coffee/pound shops.</p> <p>Significant trends such as on-line shopping have led to decline of the High Street. Trend is likely to continue and yet the plan still provides for major expansion in WGC.</p> <p>Review in light of Brexit result.</p> <p>Areas would give opportunity for regeneration</p>	<p>Reduce the area for retail growth;</p> <p>Develop a genuine retail strategy;</p> <p>Reduce the consequent impact on the Green Belt</p>	<p>The Council's targets are informed by evidence contained in the Welwyn Hatfield Retail and Town Centre Needs Assessment Update, May 2016 which follows best practice for the forecasting of retail spending and the proportion of that spending that is likely to take place online in future.</p> <p>The number of charity shops and pound shops in a centre cannot be controlled by the planning system as they fall into the same use class as other shops. Charity shops, pound shops and food and beverage outlets form important parts of the offer of any modern town centre. The likely economic impact of Brexit is not yet clear.</p> <p>No change</p>

Chapter 6 – Settlement Strategy and Green Belt Boundaries

Policy SP3 and paragraphs 6.1 to 6.9, including Table 2

DLPPS no	Main issues	Changes sought	WHBC comment
2061	<p>New Barnfield and Roehyde should be removed from the Green Belt as exceptional circumstances have been demonstrated.</p> <p>The plan is not effective, positively prepared, justified and consistent with national policy and fails the duty to cooperate on the basis that the strategy does not fully align with the strategic priorities of the Hertfordshire Waste Local Plan in terms of addressing the waste needs of the county, including the removal of land from the Green Belt.</p> <p>New Barnfield will be retained as a major developed site within the greenbelt, within which infill development and replacement buildings will be permitted, which could include residential development in the context of policies SADM1 and SADM34 (to which it relates). These policies do not provide adequate context in respect of the designation of New Barnfield as a waste management site within the Hertfordshire Waste Plan</p>	<p>Remove the two sites from the Green Belt – amend policies, supporting text and policies map accordingly.</p> <p>Refer to justification set out in the Local Waste Plan</p>	<p>The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. In his report on the examination of the Waste Site Allocations DPD, the inspector held that exceptional circumstances may exist to justify the removal of sites from the Green Belt for development for waste purposes only.</p> <p>County Waste Site Allocations are shown on the Policies Map, for information, as this allows the full extent of policy coverage to be shown.</p> <p>New Barnfield: This site is allocated in the Hertfordshire Waste Local Plan for waste management uses and is a designated as a Major Developed Site. However planning permission was refused for an energy from waste facility. Whilst the site remains allocated in the Waste Local Plan the County Council have announced that they have commenced a review of the Plan and should the site not be required for waste management purposes consider it could come forward for housing, employment and or a primary school. Given that the Council do not think it should be removed from the Green Belt it is appropriate to retain its designation as a Major Developed Site. The allocation is shown on the Policies Map. However a minor modification is proposed for the supporting text to SADM34 which will make reference to the Major Developed Sites and the allocation of New Barnfield in the Waste Local Plan.</p> <p>Minor Modification to add new paragraph after 25.12 to refer to Major Developed Sites and the allocation in the Waste Local Plan of New Barnfield.</p>

DLPPS no	Main issues	Changes sought	WHBC comment
			<p>Roehyde: This site is split between the administrative areas of Welwyn Hatfield and St Albans CDC. It has a long list of potential waste uses but none have been confirmed. There is further uncertainty as the County Council have announced a review of the Waste Local Plan and it is unclear if the site will still be required for waste management purposes. The allocation is shown on the Policies Map</p> <p>No change.</p>
45, 46, 767, 1624	<p>Lack of clarity regarding the location and extent of the Green Belt land releases and justification</p> <p>The plan is not positively prepared because it is not clear which sites are to be released from the Green Belt and the justification for doing so.</p> <p>Figures/numbers are also inconsistent (e.g. extent of land area, proportion of new homes etc.).</p>	<p>Amend policy SP3 to specify that the existing Green Belt boundary has been reviewed to enable a limited release of land for housing.</p>	<p>Table 2 of the Plan indicates the overall capacity from Green Belt and ASR release. The schedule of changes from the 2005 District Plan to the 2016 Policies Map, which is located at the back of the Proposed Submission Policies Maps document, lists which sites are being removed from the Green Belt. Once the plan is adopted the sites will no longer be in the Green Belt.</p> <p>Paragraph 6.2 of the plan explains that Green Belt boundaries have been altered [following a review].</p> <p>Less than 4% of the Green Belt will be required to accommodate new development as set out in the Summary Guide to the Local Plan. .</p> <p>Policy SP3 does not need to explain that the Green Belt boundaries have been reviewed to enable a limited release of housing land. This is addressed under supporting text to policy SP3 and paragraphs 5.10 and 5.17 of the pre-submission document.</p> <p>No change</p>

DLPPS no	Main issues	Changes sought	WHBC comment
<p>105, 197, 233, 262, 450, 528, 632, 635, 766, 776, 778, 780, 852, 965, 1090, 1159, 1318, 1343, 1378, 1492, 1614, 1754, 1775, 1864, 1876, 1924, 1958, 2087, 2089</p>	<p>Removing land from the Green Belt has not been sufficiently justified.</p> <p>The plan is not justified or consistent with national policy because there are no exceptional circumstances to justify the release of Green Belt land in the borough, particularly at Symondshyde, Welham Green, Brookmans Park, Little Health and North Mymms.</p> <p>The evidence needs to be more clearly set out in the document including the scale of Green Belt loss, the impact arising from employment land provision and the key conclusions from the joint review and site-based analysis.</p> <p>Loss of countryside and Green Belt protection (including cumulative impacts on the pattern of settlements and green corridor)</p> <p>Undermines purposes of the Green Belt Brownfield over greenfield sites (e.g. New Barnfield)</p> <p>Impacts on road network and town centre car parks / lack of infrastructure capacity</p> <p>Risk of double counting with other local authorities at the fringes of the borough</p> <p>Green Belt review – purposes of Green Belt review extended beyond that set out in the NPPF and contrary to national legislation</p>	<p>Include a summary of the overall level and location of Green Belt loss</p> <p>Clarify how the evidence has informed the strategy</p> <p>Confirm that the Green Belt has been reviewed to allow limited release for housing development (policy SP3)</p> <p>Phased, sequential approach – non-greenbelt sites first</p> <p>Amend housing figures in table 2</p> <p>Amend paragraph 2.56: Meeting housing needs without the loss of Green Belt will be very challenging and may not be achievable (CPRE).</p>	<p>The Council’s case for exceptional circumstances to review Green Belt boundaries relates to the scale of need for housing and employment land which significantly, cannot be met within the urban areas and the social and economic consequences of not doing so.</p> <p>The evidence is set out in various documents http://www.welhat.gov.uk/evidencebase, and this includes the Strategic Green Belt Review (Welwyn Hatfield Borough Council, St Albans District Council and Dacorum Borough Council). .</p> <p>The Housing and Employment Sites Selection Background Papers set out how the evidence base has informed site selection, including infrastructure constraints and the impact on the Green Belt.</p> <p>The cumulative impacts of growth on settlements and on the Green Belt have been considered through the Sites Selection Background Papers, the Green Belt Review and through the SA/SEA.</p> <p>No change.</p>
<p>233, 491</p>	<p>Phased approach should be introduced to prioritise urban and derelict land and</p>		<p>The Local Plan needs to allocate a range of deliverable sites (as shown on figure 17: housing trajectory) within both</p>

DLPPS no	Main issues	Changes sought	WHBC comment
	<p>maximise the benefits of the Green Belt (e.g. maintain gaps between settlements and preserve the setting of historic towns) as far as possible</p> <p>The plan is not consistent with national planning policy because it fails to adequately demonstrate how the strategy will contribute to the purposes of maintaining the existing settlement pattern and assisting in urban regeneration through the recycling of derelict land and other urban land.</p> <p>Land should be phased so that sites that do not affect the Green Belt are developed first. However, the plan does not distinguish between the timing of development in and outside the Green Belt.</p>		<p>urban and non-urban locations (including brownfield sites) throughout the plan period, in order to demonstrate a five-year supply of housing.</p> <p>No change</p>
450, 509, 780, 1775, 1958, 1989	<p>The strategy does not have sufficient regard to the importance of the Green Belt</p> <p>The plan is not justified or consistent with national policy because the strategy does not take proper account of Green Belt constraints and the capacity of settlements (e.g. Welham Green, Little Green, Woolmer Green) to accommodate growth (especially in terms of PDL and windfalls) and is based on overly optimistic economic forecasts.</p> <p>Neighbouring authorities should take up the housing allowance.</p>	<p>Revise housing targets to a more credible level, taking into account the Green Belt as a constraint to development.</p> <p>Remove all Green Belt site allocations</p> <p>Amend/reduce figures in table 2</p>	<p>The housing target is based upon robust and up-to-date evidence set out in the latest Strategic Housing Market Assessment.</p> <p>WH is not building enough new homes to meet the current shortfall. Past supply has not kept up with rising population and economic growth. There is a significant shortage of affordable housing in the borough.</p> <p>Lower targets would not achieve a step change in housing delivery or provide sufficient mix of housing including affordable housing to meet the needs of the borough, contrary to government guidance.</p> <p>The housing target has been tailored to take account of Green Belt and infrastructure constraints as identified</p>

DLPPS no	Main issues	Changes sought	WHBC comment
			<p>through various technical documents. This includes detailed highway modelling and the review of Green Belt boundaries around built-up-areas. The housing target is also based on the lower economic forecast scenario, which considers the linkages between jobs growth/labour force supply and housing need.</p> <p>As explained in paragraph 5.11 of the Draft Local Plan, neighbouring authorities do not have any spare capacity to accommodate the WH shortfall.</p> <p>Setting a lower target would also fail to comply with the growth aspirations of the borough (including the delivery of the Housing Strategy and Economy Strategy) and the wider sub-region.</p>
1047, 1133	<p>No strategy for reviewing Green Belt boundaries before the end of the plan period or beyond the plan period</p> <p>The plan is not positively prepared or consistent with national planning policy because it fails to properly take account of how development from 2032 onwards will be accommodated without the need for a Green Belt review.</p> <p>Land should be safeguarded to meet long term needs beyond plan period</p> <p>Green belt boundaries are likely to need reviewing before the end of the plan period</p>	<p>Identify areas of safeguarded land within the Green Belt to meet long term development needs – land is available to the south of Cuffley</p> <p>Amend strategic objective 1 (page 30 of the Plan)</p>	<p>There are no plans or other details to identify such a site to the south of Cuffley, it is simply described as land that is suitable, available and deliverable.</p> <p>No sites has been identified as being suitable to be safeguarded to meet longer term needs.</p> <p>Minor modification to strategic objective 1 (page 30 of the Plan) to delete reference to 2032 as it is likely that the Plan will need to be reviewed before 2032 in light of the shortfall against the OAN (and proposals in the Housing White Paper that Local Plans should be reviewed every 5 years).</p>

DLPPS no	Main issues	Changes sought	WHBC comment
1049, 1775	<p>Housing densities are too low or rigid.</p> <p>The plan is not positively prepared or justified because it does not provide sufficient flexibility to accommodate changes to site capacities and densities taking account local circumstances which may vary from the broad assumptions on site capacities (30 dwellings per hectare). Increasing the supply of housing through increased density will, in turn, reduce pressure on the Green Belt (e.g. residential gardens and high rise housing on the outer edges of London)</p>	<p>Consider the scope to increase density levels from 30 to 40 dwellings per hectare</p> <p>Amend paragraph 6.8 to reflect NPPF definitions for windfalls and PDL</p>	<p>Density assumptions are based on a series of baseline scenarios which have been derived from best practice guidance (e.g. URBED/Llewellyn Davies and Tribal Architects).</p> <p>The methodology (as set out in the Housing and Employment Land Availability Assessment) gives consideration to density levels reflecting constraints where relevant. Higher densities have been arrived at were appropriate. Any further upward adjustment would effectively ignore acknowledged constraints and may result in an over-estimate of site capacity which may then not be delivered.</p> <p>Both PDL and Windfall are defined in the Glossary to the Plan. No change</p>
450, 503 1318, 1141, 2073	<p>Infrastructure needs have not been fully taken into account</p> <p>The plan has not been positively prepared because insufficient attention has been given to the provision of infrastructure, especially in the context of strategic sites.</p> <p>The strategy will result in inadequate levels of infrastructure (with consequent effects on the environment).</p> <p>Lack of education capacity (e.g. Welham Green)</p> <p>Hospital provision – lack of planning</p>		<p>WHBC has worked closely with infrastructure providers to identify the infrastructure implications associated with different levels of growth. The Council will continue to work closely with its partners to bring forward the necessary appropriate and proportionate infrastructure that will be necessary to deliver the spatial strategy as set out in the plan.</p> <p>The current assessment of the borough's infrastructure requirements is set out in chapter 12 of the plan, and is explained in more detail in the Welwyn and Hatfield Infrastructure Delivery Plan.</p> <p>No change</p>
105, 450, 497, 509, 632, 685,	<p>The new settlement at Symondshyde is not supported.</p>	<p>Remove the allocation from the plan and references to the new</p>	<p>The new settlement at Symondshyde would not lie within a strategic Green Belt gap between towns. Hertfordshire is characterised by a pattern of small to medium sized towns</p>

DLPPS no	Main issues	Changes sought	WHBC comment
668, 870, 1004, 1101, 1083, 1133, 1139, 1750, 1775, 1378, 1877, 1004, 2073, 2087	<p>The plan is not justified, effective or consistent with national planning policy because the new settlement would run counter to the settlement strategy. It lies in an isolated location close to ancient woodlands and would unduly harm the Green Belt (e.g. existing settlement pattern and strategic gaps between Hatfield and Welwyn Garden City etc) and the highway network without enough critical mass to accommodate significant infrastructure contrary to the evidence (e.g. Green Belt Review, HELAA and SHLAA).</p> <ul style="list-style-type: none"> • Housing need does not amount to exceptional circumstances • Gypsy and traveller site • Deliverability issues • Insufficient weight given to its Green Belt location and associated constraints • Less suitable than other sites in more sustainable locations (e.g. Hat 2). • Site selection process is flawed and inconsistent (e.g. discounting, strategic fit etc.) • Lack of consultation 	settlement within the supporting text and policies	<p>and villages and a new village of the scale proposed would not conflict with that pattern. It will deliver a new primary school and be accessible to a new secondary school at SDS5 (Hat1) Please refer to the Council's response to representations on policy SP24 of the pre-submission document which allocates the site for further response.</p> <p>Due to the significant shortage of available sites within existing built-up-areas there is a need to release Green Belt land in the borough to help meet the housing needs of the borough. The deletion of this site would increase the shortfall against the OAN, Hat2 is not considered suitable for allocation.</p> <p>No change</p>
28, 116, 305, 316, 333, 479, 482, 509, 870, 926,	The settlement strategy is flawed. It will lead to disproportionate and uneven growth. Some settlements should get more or less growth.	Growth should be focussed within Hatfield and Welwyn Garden City	The settlement strategy directs growth towards the most sustainable locations. Green Belt boundaries have been reviewed.

DLPPS no	Main issues	Changes sought	WHBC comment
950, 968, 1101, 1133, 1135, 1318, 1354, 1576, 1582, 1750, 1182, 1234, 1721, 1754, 1877, 1913, 1935, 1952, 2001, 2006, 2072	<p>The plan is not justified, effective or consistent with national planning policy.</p> <ul style="list-style-type: none"> Over concentration of growth within the villages rather than main towns. Villages (e.g. Cuffley) do not have the capacity to accommodate this growth. Evidence base (SHLAA) is flawed and should be revisited to consider sites that are not contiguous with an urban boundary but are nevertheless in sustainable locations and provide the opportunity for additional housing More growth should be accommodated within the excluded villages (e.g. Welham Green, Welwyn, Brookmans Park and Cuffley). Over concentration of growth within Welwyn Garden City and Hatfield (e.g. urban extension sites are not sustainable). Scale of development should be directly proportionate to the relative sustainability of a settlement and its position in the hierarchy (however, a significant number of homes will be in smaller, less sustainable locations – 35% of the total requirement). 	<p>Review Green Belt boundaries</p> <p>Include more sites in and around the excluded villages</p> <p>Remove washed over villages from the Green Belt to increase brownfield and infill opportunities (Home Builders Federation)</p> <p>Revisit the settlement strategy and the evidence base (specifically the SHLAA) to review sites such as an infill site at Stanborough, which whilst adjacent existing development and washed over by the Green Belt, is still located in a sustainable location</p>	<p>The majority of growth will take place in the two main towns (Welwyn Garden City and Hatfield) where there is good access to jobs services and facilities, with more limited development taking place in the excluded villages where it can be supported by the necessary infrastructure; and through the creation of a new settlement at Symondshyde.</p> <p>The Plan does not propose removing washed-over villages from the Green Belt. These are locations with less services and facilities and are considered to be less sustainable locations for growth. However, in order to facilitate a limited amount of development, policy SADM34 sets out the criteria by which infill development can take place in villages washed over by the Green Belt. These villages do not have the necessary infrastructure to support larger scale development.</p> <p>When reviewing Green Belt boundaries, NPPF states that LPAs should ... <i>consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt</i> ... Stanborough has few services and facilities. It is neither a town or a village inset within the Green Belt and the site promoted is not adjacent an existing urban boundary, which lies to the east beyond the A1(M). In-setting housing sites within the Green Belt is not considered to represent an appropriate strategy. Stanborough also falls within a narrow strategic Green Belt gap (between towns) and a primary local Green Belt gap (between towns and villages).</p> <p>The settlement strategy has also been rigorously tested against the principles of sustainable development. The SA/SEA considers that the approach to growth set out in the proposed submission version would offer a range of sustainability benefits, especially in terms of promoting the</p>

DLPPS no	Main issues	Changes sought	WHBC comment
	<ul style="list-style-type: none"> • Hierarchical approach runs counter to good planning – rather should be based on the relative sustainability of sites • Dispersed strategy runs counter to the NPPF and the evidence base and the plan as a whole • No assessment of cumulative impacts of growth on the villages (Hatfield villages should be considered as a single entity). • Significant loss of greenspace 		<p>use of sustainable transport, promoting renewal and regeneration within town centres, avoiding harm to sensitive landscapes while addressing housing needs and making best use of available brownfield land.</p> <p>Alternative approaches to the settlement strategy have also been considered at various stages (e.g. Issues and Options and Emerging Core Strategy) from the outset of the plan process and are summarised in the annex to the SA report.</p> <p>Section 6 of the SA report outlines a summary of the potential cumulative impacts of growth options within the large and small villages, consistent with the requirements of the SEA Directive. The Local Plan has taken into account the appraisal findings.</p> <p>No change</p>
807, 1067, 1083, 1236, 1721, 1750, 1754, 1913, 1914	<p>Settlements have been put in the wrong tiers of the hierarchy</p> <p>The plan is not positively prepared or justified because some of the settlements have been wrongly categorised within the hierarchy and should be reclassified.</p> <ul style="list-style-type: none"> • Digswell should be included as a large excluded village rather than a small village, with more land allocated. • Symondshyde is not a suitable categorisation (small excluded village). • Site allocations within Welham Green are not commensurate with its role and function. 	<p>Little Health and Symondshyde should be moved down the hierarchy to reflect their relative size and role</p> <p>Increase the level of provision</p> <p>Sites should be removed from Green Belt around Welham Green</p> <p>Identify Digswell as a large excluded village</p> <p>Identify Little Heath as a small Green Belt village</p>	<p>The aim of the settlement strategy is to ensure that development takes place at an appropriate scale within the most sustainable locations.</p> <p>Settlements are placed in the hierarchy (in policy SP3) relative to their role within the borough-wide and sub-regional context, and their accessibility to jobs, facilities and services.</p> <p>Digswell does not have a sufficient level of services to warrant its identification as a large village.</p> <p>Little Health has a primary school, does not lie within the Green Belt and can absorb additional growth. , It is accessible to shops and services within Potters Bar and the Great North Road (A1000).</p> <p>At Symondshyde, the new village will have the necessary facilities (e.g. education and community provision, sustainable transport links and a small neighbourhood</p>

DLPPS no	Main issues	Changes sought	WHBC comment
	<ul style="list-style-type: none"> Little Health is wrongly categorised as a small excluded settlement and is more akin to a small Green Belt village (relatively few services, GB location etc). Stanborough's status as a small Green Belt village does not recognise its location and ease of accessibility to shops, services and employment opportunities within WGC. Stanborough displays similar characteristics to other suburbs of the town. 		<p>centre) and be of a scale to warrant its categorisation as a 'small excluded village' within the settlement hierarchy (see table 2).</p> <p>Welham Green does not have sufficient school capacity to support further housing growth.</p> <p>No change</p>
<p>758, 133 968, 1067, 1133, 1141, 1218, 1371</p>	<p>Inadequate consideration has been given to alternative strategies (e.g. a garden city)</p> <p>The plan is not justified because the strategy is not considered the most appropriate when considered against the alternatives, both during and beyond the plan period.</p> <p>WHBC should work closely with adjoining boroughs in the light of advice from DCLG to plan a proper new freestanding new settlement of town size in Hertfordshire, and provide evidence of joint working to discuss its potential A more imaginative solution should be found. North Herts are keen to do so.</p>	<p>Need evidence of further cooperation (Local Enterprise Partnership).</p>	<p>No site or proposal of sufficient size and scale is available to deliver a new town within the borough. .</p> <p>Discussions have taken place with other authorities around longer term delivery options (HIPP and DtC) however, it is too early to indicate what the potential outcomes are likely to be.</p> <p>North Herts DC includes in its proposed Submission Plan a policy (SP8) commitment to identify new settlement options for additional housing supply after 2026. WH will continue to work with NHDC to explore the potential for a new settlement which may be able to take account of longer term unmet housing needs in Welwyn Hatfield.</p> <p>Planned urban extensions at Strategic Development Sites are of a sufficient scale to deliver a relative range of services and facilities. Without such scale of development, insufficient opportunities would exist to support communities with the infrastructure it requires alongside housing growth.</p>

DLPPS no	Main issues	Changes sought	WHBC comment
	<p>Planned urban extensions are too large and unsustainable.</p> <p>The plan needs to adopt a strategic approach to the planning of development corridors (e.g. Pioneer, London, Stanstead) within the Green Belt.</p> <p>Impact of Brexit vote should also be considered.</p>		<p>The terms of 'Brexit' have yet to be negotiated and agreed and it is premature to know what the various impacts might be. The latest SNPP already make a significant adjustment for a net reduction in in-migration and the 2017 SHMA update takes account of this.</p> <p>No change</p>
1049, 1101, 1936	<p>Table 2 – Distribution of housing growth</p> <p>The plan is not positively prepared, justified, effective or consistent with national policy</p> <p>The target for Hatfield should be increased by 1,100 to include an allocation for Hat2</p> <p>2.5% non-implementation allowance is too small</p> <p>Round up the figures in table 2 to an appropriate sum and prefacing these figures with “about”</p>	<p>Amend Table 2 to increase total capacity for Hatfield to 4,036 (Green Belt to 2,870) and subsequent changes to the table</p> <p>The Council should apply the standard 10% allowance for non-implementation given the windfall allowance cannot be guaranteed.</p>	<p>Hat2 has not been selected for allocation in the Plan.</p> <p>No change</p> <p>The non-implementation allowance reflects local evidence. A standard approach is not appropriate.</p> <p>The windfall allowance is based on local evidence.</p> <p>The numbers reflect assessments carried out in the evidence base. There is no need to ‘round’ or insert the word ‘about’ in order to make the plan sound.</p> <p>No change</p>
	General comments		
182	<p>Insufficient protection is afforded to rural roads</p> <p>The plan is not positively prepared, justified or effective because it does not</p>	<p>Policy SP3 and SADM2 should carry forward the provisions of policy RA28 of the Welwyn Hatfield District Plan.</p>	<p>Policy SADM2 adequately covers the impact of road traffic within rural areas. The impact on the road network has been taken into account in the assessment of the suitability of sites.</p> <p>No change.</p>

DLPPS no	Main issues	Changes sought	WHBC comment
	adequately address the impact of new development on rural areas, especially where there is conflict between different users. There is a need to restrict or limit development where it would have an adverse impact on road traffic or improvements will adversely affect the character of the countryside.		
1628, 1775	<p>Policies SP3 and SADM1 should provide a clearer definition of “disproportionate growth” in the context of assessing the suitability of development proposals</p> <p>The plan is not justified or consistent with national policy because it is unclear how proposals will be deemed to be disproportionate.</p>	Define and consult on “disproportionate growth”	<p>It is clear from the criteria in SADM1 that the role and function of the settlement in the hierarchy should be taken into account when considering whether growth is disproportionate. Policy SP9 Place Making and High Quality Design also requires development proposals to respond to their character and context and the Implementation section to that policy sets out further guidance</p> <p>No change</p>
1048	<p>Existing Green Belt boundaries will not be maintained in and around the excluded villages.</p> <p>The plan is not positively prepared because the description of the Green Belt boundaries is misleading in that it could be taken to refer to the Green Belt boundaries as existing (e.g. Cuffley)</p>	Delete the wording in the settlement hierarchy table: “... <i>maintenance of Green Belt boundaries</i> ”	<p>Once established through the Local Plan, the boundaries of the Green Belt around the excluded villages will be maintained throughout the plan period (see paragraphs 84 and 85 of the NPPF). Appropriate uses will only be acceptable in these locations where they maintain the openness of the Green Belt (see policy SAM32).</p> <p>Green Belt boundaries can only be altered in exceptional circumstances (through a review of the Local Plan).</p> <p>No change</p>
776	Support from Broxbourne Borough Council		Noted

Chapter 6 – Settlement Strategy and Green Belt Boundaries
Policy SADM1 Windfall Development and paragraphs 6.10-6.11

DLPPS no.	Main issues	Changes sought	WHBC comment
1938, 2074	<p>The Plan’s allowance for windfall is too high</p> <p>Whilst it is accepted that extensions to permitted development rights will facilitate windfall development, the Plan is not justified because the windfall allowance made is not consistent with the 2014 SHLAA Phase 3 windfall report.</p> <p>The Plan is not justified as the windfall allowance is based upon assumptions.</p> <p>The Plan is not positively prepared, justified, effective or consistent with national policy because its reliance on windfall development rather than other deliverable and developable sites which have not been allocated is not the most appropriate strategy.</p>	<p>None stated.</p> <p>The windfall allowance should be reduced to 34 dwellings per annum.</p> <p>None stated.</p>	<p>The 2016 Housing and Employment Land Availability Assessment (HELAA) looked again at the amount of windfall likely to be achieved in the borough (partly because of permitted development changes) – the 2014 SHLAA Phase 3 is now out of date. No change.</p> <p>Like most of the evidence underpinning the Plan, the windfall allowance is a forecast derived from past trends with appropriate adjustments. No change.</p> <p>The windfall allowance is considered to be robust. Site selection decisions were made following assessment in the HELAA and are not linked with the windfall assessment. No change.</p>
991	<p>The Plan’s allowance for windfall is too low</p>		

DLPPS no.	Main issues	Changes sought	WHBC comment
	<p>The Plan is not positively prepared, justified or effective because the windfall allowance has been based on very conservative assumptions and ignores the supply of former education sites e.g. Hazel Grove and Southfield in Hatfield. The Plan therefore has to rely on too much Green Belt release.</p>	<p>The windfall allowance needs to be revisited.</p>	<p>A windfall allowance has been made for educational uses, and of the examples given one is actually proposed for allocation (HS13) whilst the other is in the Green Belt. There have been no changes in the underlying assumptions forming the previous windfall allowance since they were made, and which are considered to strike an appropriate balance between realism and robustness. No change.</p>
<p>1628, 2061, 2063</p>	<p>The wording of the policy itself is not appropriate</p> <p>The Plan is not justified, effective or consistent with national policy because point i) of the policy does not comply with the NPPF, which allows for windfall development in all villages rather than just the larger villages excluded from the Green Belt.</p> <p>The Plan is not justified, effective or consistent with national policy because there is no definition at point v) of the policy of what the acceptable proportionate growth of a settlement would be.</p>	<p>The word 'excluded' should be deleted.</p> <p>'Disproportionate' should be defined.</p>	<p>Point i) only distinguishes between excluded and Green Belt villages so that infill proposals in the Green Belt can be directed to Policy SADM34. This allows further detail to be given in the most relevant part of the Plan, and is not considered to introduce any inconsistency. No change.</p> <p>The intention of this point is to ensure that development on unallocated sites cannot be of such a scale that it changes the character of a settlement, e.g. by enlarging a small excluded village (per the settlement hierarchy) such that it effectively becomes a large excluded village. Proposals for development on this scale are likely to be very rare, and it is considered that a qualitative means of assessing proportionality is more appropriate. No change.</p>

DLPPS no.	Main issues	Changes sought	WHBC comment
<i>Continued</i>	<p>The Plan is not justified, effective or consistent with national policy because the final sentence of the policy does not set any limitation on the amount of development that can take place, particularly with regards to the Green Belt.</p>	<p>The words 'subject to the proposal being consistent with the other policies of the Plan' should be added.</p>	<p>See above with regards to Green Belt windfall proposals – these will be determined under Policy SADM34. All proposals will be determined taking the policies of the Plan as a whole in the round in any case, so the suggested change is not necessary.</p>
	<p>The Plan is not effective or consistent with national policy because no reference has been made for the need for windfall proposals to not sterilise mineral resources or allocations in the Waste Local Plan.</p>	<p>The policy should be amended to require proposals to consider policies in the Hertfordshire Minerals and Waste Local Plans, with accompanying additions to para 6.10.</p>	<p>It is considered that any assessment of the minerals and waste implications of a proposal can only be carried out effectively by the County Council as minerals and waste planning authority. This Council will ensure that the County Council is consulted on proposals in accordance with the requirements set out in the minerals and waste development plans, but the wording proposed is considered excessive for inclusion in a development plan which does not deal with these matters. No change.</p>

Key Diagram

DLPPS no.	Main issue	Changes sought	WHBC comment
2117, 1784, 1050, 1884	<p>The Key Diagram is potentially misleading.</p> <p>The Key Diagram should show all the proposed housing sites, including those requiring the release of green belt land around the villages.</p> <p>Half of the strategic housing site to the south east of Welwyn Garden City (SDS2) is allocated as an area of Urban Open Land (UOL); this should be shown on the Key Diagram.</p>	<p>The Key Diagram should be amended to show all the new housing sites where Green Belt releases are proposed.</p>	<p>The key diagram is strategic in nature and cannot show all the housing allocations. The Policies Maps identified allocations, including all the proposed housing sites. (The schedule of changes from the 2005 District Plan Proposals Map to the 2016 Draft Local Plan Policies map identifies which sites are to be removed from the Green Belt). No change.</p> <p>The key diagram is a strategic level diagram and indicates the relative location of site SDS2 (and other SDSs). The Urban Open Land designation is shown on Policies Map 3.</p> <p>No change</p>

DLPPS no.	Main issue	Changes sought	WHBC comment
	The proposed strategic sites South-East Welwyn Garden City, North-West Hatfield and at Symondshyde SDS2, SDS5 and SDS6 are unsound so should not be shown on the Key Diagram.	Remove Strategic Sites SDS 2, SDS 5, and SDS 6 from the key diagram.	These sites have been identified through the site selection process and the allocation of these sites is sound. No change.