

Appendix A6

**Main Issues Summary
Draft Infrastructure Delivery Plan (IDP)**

IDP Policy Context

PSDIDP no.	Main issue	Changes sought	WHBC comment
109	<p>The IDP has not been prepared consistent with the National Planning Policy Framework.</p> <p>The IDP does not fully deliver according to the requirements of Paragraph 156 of the NPPF. It is lacking firm proposals for transport, waste management, water supply, and flood risk. Provision of health, schools, and community facilities is only partially covered.</p>	<p>A more definitive list of projects which must be delivered.</p>	<p>The Draft Infrastructure Delivery Plan identifies all relevant infrastructure needs that are anticipated over the plan period and which can be clearly related to growth, so that there is clear evidence that such need is both known and actively being planned for. Where necessary, strategic priorities are set out in the plan itself, i.e. education and major transport infrastructure. No change.</p>
109	<p>The potential contribution of CIL is recognised, but there is no definitive expression of what contribution this could make to infrastructure provision.</p>		<p>The Council is set to consult on a CIL preliminary draft charging schedule in Spring 2017. At such time as the Council has a clearer indication of potential CIL revenues the Draft Infrastructure Delivery Plan will be updated to reflect the potential contribution CIL could make to funding infrastructure. No change.</p>
109	<p>Welwyn Hatfield Borough Council is not responsible for delivering most types of supporting infrastructure</p>		<p>The Council acknowledges that the delivery of many projects in the IDP are the responsibility of other organisations. The Council is committed to working with service providers and developers, and to seeking to influence public, private and agency funding and priorities, to ensure that development is supported by the right infrastructure. No change.</p>

IDP Local Context

PSDIDP no.	Main issue	Changes sought	WHBC comment
15	The Council has not commissioned an infrastructure capacity survey to evaluate whether infrastructure can cope with the substantial increase in dwellings proposed.		The purpose of the IDP is to identify all relevant infrastructure needs that are anticipated over the plan period and which can clearly be related to growth, so that there is clear evidence that such need is both known and actively being planned for. No change
53, 55, 108	The growth which is proposed is based on flawed population assumptions and results in an unrealistic amount of development which cannot be realistically served through existing/upgraded infrastructure		<p>The methodology which has been used to calculate the borough's objectively assessed need (OAN) for housing is set out in the Strategic Housing Market Assessment. The Council's responses to representations about the OAN are set out in the Draft Local Plan Main Issues report against Policy SP2.</p> <p>The IDP identifies all relevant infrastructure needs that are anticipated over the plan period and addresses how they can be carefully planned, adequately funded and delivered in a timely fashion. No change</p>
54, 66, 116, 55	Infrastructure is inadequate to support the proposed level of growth	<p>Reduce quantum of development.</p> <p>Provide detailed plans, with relevant time scales for delivery of the infrastructure upgrades</p>	The IDP sets out the infrastructure that is required over the plan period to support proposed growth. Further it identifies a number of potential funding and delivery strategies to secure necessary infrastructure upgrades. No change.

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110	<p>The impact of development in the excluded villages will be disproportionately greater than elsewhere.</p>		<p>The IDP has considered infrastructure needs on a variety of scales including on a region wide, borough wide and settlement specific basis.</p> <p>Through the process of selecting sites for inclusion in the plan the Council has carefully considered infrastructure capacity. Development has been directed to locations which are considered to be most sustainable and where infrastructure capacity exists to support growth, or where infrastructure can be feasibly and viably upgraded to support growth. With respect to the villages, a number of sites which have been identified as being suitable for development have not been allocated on the basis that there is insufficient school capacity.</p> <p>No change.</p>
15, 54, 64, 66	<p>The infrastructure in the southern villages is inadequate to support the proposed level of growth</p> <p>Proposed development in Cuffley will put significant strain on the local highways network which is already at capacity</p>	<p>Reduce quantum of development.</p> <p>Deliver improvements to flow of traffic through the villages.</p> <p>Focus development along the A1 corridor which already has the appropriate infrastructure in place.</p>	<p>The IDP has carefully considered infrastructure capacity in the southern villages. Specific regard has been had to education capacity and the impacts of development on the local highway network.</p> <p>The Council has liaised extensively with the County Council as the local education authority to understand what capacity currently exists in village schools and whether it is feasible, viable and desirable to deliver additional capacity.</p> <p>In partnership with the County Council as local transport authority, the Council has assessed</p>

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			<p>the impacts of development on the highways network in Cuffley. A range of mitigation measures are proposed which are considered to address impacts to the local highways network.</p> <p>The advice received from the County Council as local highways authority is that the additional traffic impact of proposed development in Cuffley should be mitigated by modifications to the Plough Hill/Station Road/Northaw Road East Junction and the Northaw Road West/Cattlegate Road junction. No change.</p>

IDP Methodology and Assumptions

PSDIDP no.	Main issue	Changes sought	WHBC comment
70	<p>The proposed phasing of infrastructure delivery is too optimistic. The Council will find it difficult to deliver so many projects between 2023 and 2027.</p>		<p>The Infrastructure Delivery Schedule at Appendix 1 of the IDP sets out a range of infrastructure items required as a result of growth together with an indicative delivery timescale. The delivery of the stated items is the responsibility of a range of infrastructure providers rather than just the Council. No change.</p>
121	<p>Insufficient infrastructure is planned during the early part of the plan to support development expected to come forward over that time period.</p>	<p>Infrastructure delivery needs to be phased in the early part of the plan to support proposed development.</p>	<p>The Council has consulted extensively with infrastructure providers to understand what infrastructure is required and when it should be delivered to support planned housing growth. This outcome of these discussions is reflected in the delivery timescales indicated in the IDP.</p> <p>To ensure that all development is supported by appropriate infrastructure the plan contains an infrastructure delivery policy (SP13) which provides that developers will be required to contribute to the reasonable costs of enhancing existing infrastructure or providing new physical, social and green infrastructure, required as a result of their proposals, through either financial contributions (including planning obligations or the Community Infrastructure Levy (CIL)), or by direct provision of such infrastructure on-site within the development. Supporting infrastructure should be provided in advance of, or alongside, the development, unless there is sufficient existing capacity.</p>

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			The Council will continue to consult with infrastructure providers so that the latest infrastructure position is understood and that it can respond as appropriate to identified priorities. No change.
121	The amount of growth proposed in the plan should be conditional upon funding being in place to deliver the necessary supporting infrastructure	The Council should use a Monte-Carlo simulation of all the probabilities and unknowns regarding infrastructure delivery to establish what will be achievable with the assumed money available.	The IDP acknowledges that there is a level of uncertainty around infrastructure funding and delivery when considering medium and long-term infrastructure requirements. In this context, the IDP identifies a range of possible funding mechanisms to deliver infrastructure including developer contributions, and public and private funds. The Council will monitor available funding as well as working with partners to secure appropriate levels of funding. No change.
121	Infrastructure delivery is over-reliant on funding from Section 106 and CIL		<p>A key purpose of the IDP is to identify all of the infrastructure needs over the plan period that are related to proposed growth. As demand for infrastructure is driven by new development it is justified that developers should make a reasonable contribution towards the cost of delivering this infrastructure. The primary mechanisms for this are Section 106 and CIL.</p> <p>The IDP sets out a range of other potential funding sources for infrastructure delivery, mostly involving public funds, however due to the way that infrastructure investment is typically programmed it is difficult to identify with certainty specific funding sources, particularly when considering a 15 to 20 year time period. No change.</p>

IDP Transport

PSDIDP no.	Main issue	Changes sought	WHBC comment
123, 77, 133	Proposed growth will further exacerbate existing capacity issues on the strategic highways network	<p>Improvements to East West Links are required in the plan</p> <p>Consideration could be made in the longer term to re-opening rail links to ease road congestion</p>	<p>The Council has consulted extensively with the local highways authority (Hertfordshire County Council) and Highways England regarding the impact of proposed development on the strategic highways network. It is acknowledged that additional development will result in additional traffic, however subject to appropriate mitigation it is considered that this will not give rise to unacceptable impacts in terms of the operation or safety of the strategic highways network.</p> <p>Para 7.4 of the plan specifically sets out that the Council will work with Hertfordshire County Council and other Hertfordshire authorities to address congestion issues on the A414 and seek opportunities for transport improvements to increase the ease of east-west movement across the borough and in the county generally.</p> <p>Former branch line railway routes within the borough have been converted into greenways which provide high quality walking and cycling routes. Therefore while the Council promotes the use of sustainable modes of travel such as trains, there are not considered to be suitable opportunities to re-open rail links within the borough. No change.</p>
94, 62	The IDP is too narrowly focused on improvements to the strategic road network. It does not set out adequate mitigation	Assess transport infrastructure required at all levels and	The IDP focuses upon impacts of development on the principal highways network (not just the strategic network) and key junctions within that

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	measures for other roads that will be impacted by development.	assess if this is feasible and fundable.	network. It considers impacts on that network and elsewhere, together with potential mitigation measures. Investigations have taken place into traffic conditions in the key villages anticipated to be subject of growth proposals in the emerging Local Plan to consider the extent to which mitigation works can address any significant issues of congestion and delay as well as any safety considerations. Potential solutions proposed are set out in para 5.115. No change.
122	It is unclear that the assessment of the impact of new development on the A1(M) has taken account of all of the development proposed along the motorway, including that proposed by other district councils currently preparing local plans	Comprehensive assessment of impact of new development on the A1(M)	The Council commissioned consultants AECOM to assess the impact on proposed growth on the strategic highway network. Various scenarios were modelled utilising the Welwyn-Hatfield and Stevenage-Hitchin (WHaSH) model, which has been developed in partnership with HCC and the Highways Agency (now Highways England). The modelling takes account of specific growth proposals in the model area including in Stevenage Borough and North Herts District. For growth outside the model area it uses a standard growth assumption. No change.
19, 27, 31, 49, 86, 90, 83, 5, 2, 48, 106, 84, 101, 95, 25, 37, 33, 56, 10, 14, 24	The plan seeks to encourage the use of public transport, however train services are already operating at or over capacity		Govia Thameslink Railway (GTR), which operates all train services which run through the borough, undertook a public consultation in late 2016 regarding the proposed changes to their timetable which are planned to take effect from 2018. Whilst the Council has objected to some aspects of the proposed changes, there are some key improvements proposed which the Council supports including more travel options and new trains which will provide additional

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			capacity. The Council will continue to engage with GTR to ensure that the new timetable delivers as many improvements as possible. No change.
111	The IDP does not mention the recent Great Northern rail consultation, and the potential changes in the pattern of rail services from 2018.	Add reference to Great Northern rail consultation	Comments noted. The IDP will be updated so that it makes reference to the consultation and the key proposals contained within it. Update required.
27, 8, 30, 128, 48, 106, 84, 101, 95, 25, 33, 56, 10, 14, 65, 24	<p>There is insufficient car parking available at railway stations</p> <p>There is insufficient car parking at Cuffley Railway Station</p> <p>There is insufficient car parking at Potters Bar Railway Station</p>	Increase parking capacity at railway stations	<p>The Council notes that usage of railway station car parks in the borough is very high. At this time the Council is not aware of any proposals from Network Rail or Great Northern to increase car parking capacity at stations within the borough or at nearby Potters Bar station.</p> <p>The Council will continue to engage with key partners and if a need for additional car parking can be clearly demonstrated will work with them to see whether this can be delivered. The car parking capacity at Hatfield railway station was recently doubled as part of a project to redevelop and revitalise the station. No change.</p>
124	Proposed development at Panshanger will exacerbate existing traffic issues in the area	Remove Panshanger allocation from the plan	The Council has consulted extensively with the County Council as local highway authority regarding the traffic impacts of proposed developments on the highways network. The County Council consider that Panshanger is well located to build on existing bus services, cycle and pedestrian links to other areas of Welwyn Garden City. The Council considers that the highways impacts can be suitably mitigated with solutions to be considered in detail as part of the

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			masterplanning of the site in line with the requirements of Policy SP18 that a masterplan SPD be prepared to guide the development of the site. No change.
16, 19, 27, 107, 8, 128, 31, 49, 86, 90, 83, 82, 5, 2, 48, 106, 84, 101, 95, 25, 10, 14, 24, 37	<p>The proposals in the plan will exacerbate existing traffic issues in Cuffley and its vicinity</p> <p>Proposed mitigation measures are insufficient</p>	<p>Reduce proposed growth in Cuffley</p> <p>Change distribution of housing growth based upon infrastructure capacity</p> <p>Consider a bypass around Cuffley/other diversion measure</p> <p>Increase parking capacity at Cuffley railway station</p> <p>There should be a transport assessment of each of the Cuffley allocations</p> <p>More consultation with the local highways authority and detailed studies should be undertaken to explore capacity issues</p>	<p>The Council has consulted with the County Council as local highway authority regarding the highways impact of proposed development within Cuffley. The County Council has advised that the cumulative effect of developments in Cuffley is likely to have an impact on the Plough Hill/Station Road/Northaw Road East Junction and the Northaw Road West/Cattlegate Road junction but that it should be possible to mitigate the additional traffic impact through changing the priority of the junctions. At such time as planning applications for the allocated housing land are submitted they will be required to provide a Transport Assessment or Transport Statement as appropriate in accordance with Policy SADM2 of the plan. It must be demonstrated to the satisfaction of the Council and the County Council that development would have no unacceptable impacts on the local and/or strategic transport network. No change.</p>

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31, 86, 83, 2, 14	Proposed development at Goffs Oak (in Broxbourne District) will impact on traffic in Cuffley	<p>Modelling should take account of development proposed in both Cuffley and Goffs Oak.</p> <p>The quantum of development proposed in Cuffley should be reduced.</p>	<p>The Council is aware that the Broxbourne Draft Local Plan proposes a number of development sites in Goffs Oak, a village in Broxbourne borough a short distance east of Cuffley.</p> <p>The Council has worked with the County Council, which has utilised the new Countywide Transport Model (COMET) to understand the highways implications of growth in the Cuffley area. Each authority within Hertfordshire contributed to the model in the form of information around sites which are proposed in their adopted or emerging local plans. As such the model provides a robust guide to the key highways challenges relating to growth proposed within Hertfordshire as a whole. The model has not indicated any major highways issues pertaining to Cuffley or Goffs Oak and the Council have therefore been advised by the County Council that, subject to appropriate mitigation measures, the proposals for Cuffley are likely to be acceptable in highways terms.</p> <p>No change.</p>
30, 68, 106, 139, 33, 56, 65	The proposals in the plan will exacerbate existing traffic issues in Little Heath and its vicinity including Potters Bar	Remove allocations in Little Heath	<p>The Council has worked with the County Council, which has utilised the new Countywide Transport Model (COMET) to understand the highways implications of growth in the Little Heath area. It is recognised that Little Heath has a strong functional relationship with Potters Bar, which falls within Hertsmere borough. The COMET model has not indicated any major highways issues pertaining to additional growth</p>

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			<p>at Little Heath and the Council have therefore been advised by the County Council that, subject to appropriate mitigation measures, the proposals for Little Heath are likely to be acceptable in highways terms. No change.</p>
98	<p>The delivery of strategic site Hat1 at North West Hatfield will have unacceptable impacts on the local highways network including rural roads</p>	<p>Verify and validate traffic modelling for the site</p>	<p>The Council has assessed the impacts of growth at North West Hatfield (Hat1) using the Welwyn-Hatfield and Stevenage-Hitchin (WHaSH) model, which has been developed in partnership with HCC and the Highways Agency (now Highways England). The model takes account of growth proposals along this part of the A1(M) and includes a growth factor for growth outside the model area. The model indicated that North West Hatfield (Hat1) and Symondshyde (Hat15) are likely to significantly increase the pressure on the local road network. The Council's consultants proposed a number of mitigation measures to address the impacts. Modelling of the proposed mitigation indicated that the identified measures would improve throughput and capacity at key junctions.</p> <p>The landowner at Hat1 has carried out initial transportation studies to establish a preliminary access strategy. Based upon this strategy, the County Council has indicated it is reasonably assured that improvements to the local highway network can be undertaken that will provide additional capacity. The County Council advised further that capacity improvements at local junctions will need to be developed alongside significant sustainable transport linkages to</p>

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			ensure the site is well connected for all modes. These issues will be explored in detail as part of the masterplanning of the site in line with the requirement of Policy SP22 that a masterplan SPD be prepared to guide the development of the site. No change.
96, 59	The plan does not take adequately address air transport. This is inconsistent with the NPPF which requires Councils to plan positively for air transport.	Plan positively for air transport in the borough by retaining Panshanger Aerodrome	The Council recognises that Panshanger Aerodrome is a facility which is highly valued by the public. Policy SP18 therefore provides that the masterplan which must be prepared to guide the redevelopment of Panshanger allows the opportunity for a realigned grass runway on land to the north of the Green Belt boundary. No change.
96, 60	When the funding provided by developer for sustainable travel measures runs out these services are likely to be discontinued.		Comments noted. The Council is unable to guarantee that sustainable transport measures which are funded or part-funded through planning obligations will be continued once the subsidy has expired. The Council together with the County Council will seek to secure a package of measures which offer the prospect of being viable to be run commercially in the long-term once community awareness of the measures and patronage of services has been established. No change.
111	The IDP does not mention the contribution of UNO, the University Bus Service, and its key importance in local transport infrastructure.	Add reference to University Bus Service	Para 5.11 of the IDP notes Uno Bus as one of the major commercial bus services operators within the borough. No change.
111	The IDP does not mention improvements to Station Road, Brookmans Park, in connection	Add reference to improvements to Station Road, Brookmans Park, in	Para 5.115 of the IDP sets out a range of mitigation works proposed to address the wider impact of additional traffic generated by development proposals in the borough's

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	with the proposed development to the west of the railway (Local Plan policy SADM31).	connection with the proposed development to the west of the railway	villages. Improvements to Station Road are required to provide safe access to the site and are therefore excluded from table 5.115. No change.
139, 33, 56, 65	The IDP does not make any provision for the increased demand on rail services operating from Potters Bar that will be caused by proposed growth	Further work to assess impact on Potters Bar Railway Station and potential mitigation measures	It is recognised that development proposed in Little Heath could result in some additional demand for rail services operating from Potters Bar. The Council responded to Govia Thameslink Railway's consultation in late 2016 indicating its support for improvements to the timetable which would result in a greater frequency of services on Great Northern metro routes which includes those which serve Potters Bar. The Council will continue to engage with key partners to help secure improvement to railways services which will serve the borough's residents. No change.
100	The IDP does not take account of cumulative effect of the housing and gravel extraction proposals on the St Albans and Welwyn Hatfield border	The report should have regard to the cumulative effect of the proposals both within Welwyn Hatfield and St Albans District	<p>The Council is aware that the emerging St Albans Strategic Local Plan proposes a number of development sites which could result in additional traffic within Welwyn Hatfield.</p> <p>The Council has worked with the County Council to assess the cumulative impact of traffic from housing and minerals development on the roads between Hatfield and St Albans. Results from the WHaSH and COMET modelling work have been considered alongside the Transport Assessments for minerals developments. This work has identified that there would be an impact on local highways but the advice from the County Council is that, subject to appropriate</p>

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			mitigation measures, the proposals taken as a whole are likely to be acceptable in highways terms. No change.
77, 134	<p>Proposed traffic mitigation on the A1(M) needs to be delivered earlier in the plan period</p> <p>Proposed highway mitigation works at the 4 roundabout complex associated with A1(M) junction 6 should be delivered early in the plan period to minimise impacts of growth rather than delivered after growth as mitigation</p>	Proposed highway mitigation works at the 4 roundabout complex associated with A1(M) junction 6 (scheduled for 2023-2027) should be brought forward	The Council has identified that improvements to the four roundabouts comprising A1(M) Junction 6 will be required to mitigate the impacts of additional growth during the plan period. At this stage funding is not in place to deliver the scheme, however the Council will continue to engage with, and lobby, partners to secure funding. No change.
137	<p>Junction improvements have been recommended by transport consultants through modelling work at Mundells Gyrotory, A414/A1000 (Mill Green) and Junction 16 A1000/South Way but are not proposed by the IDP for delivery.</p>		Comments noted. Update IDP to reflect latest highways junction improvement recommendations by transport consultants. Update required.
137	<p>Transport consultants have recommended two further junctions where mitigation should be delivered (A1000/Chequers/Broadwater Road and Red Lion junction in Hatfield). These have not been proposed in the IDP.</p>		Comments noted. Update IDP to reflect latest WHaSH (Welwyn Hatfield and Stevenage-Hitchin) Highway Model Mitigation testing. Update required.
137	<p>Mitigation measures are shown to effectively alleviate delay and congestion at a number of locations. However, with respect to A1(M) junctions 4 and 6 the identified schemes ease the issues but congestion/delays still persist. Further improvements at this stage are limited</p>		The Council has consulted extensively with Highways England and the County Council regarding potential mitigation measures at A1(M) junctions within the borough. It is acknowledged that the current proposed solutions at junctions 4 and 6 only offer partial mitigation and that there are constraints which

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	<p>without considering much larger schemes requiring third party land.</p>		<p>make it difficult to deliver full mitigation. The Council is committed to continuing to work with Highways England and the County Council to deliver a sustainable long-term solution. In line with advice from the County Council, the plan seeks to help deliver a long term modal shift in favour of sustainable methods of travel. Update IDP to reflect requirement to keep the IDP up to date to take into account ongoing transport modelling work being carried out by the County Council and Highways England. Update required.</p>
137	<p>Future iterations of the Infrastructure Delivery Plan should reflect the drive for a sustainability agenda through the planning process. A hierarchical approach should be taken, starting with reducing the need to travel, encouraging shift to sustainable modes, improve efficiency of existing modes and making best use of the existing network.</p>		<p>The Council notes the importance of reducing the need to travel and encouraging a shift to sustainable modes of travel. Policy SP3 of the plan details the proposed settlement strategy which is intended to deliver a sustainable pattern of growth. Policy SP4 of the plan sets out that the Council will emphasise promoting the use of sustainable modes of travel.</p> <p>The IDP seeks to identify all of the infrastructure which will be required to support the growth proposed within the plan. This includes mitigation measures to the highways network as well as a variety of measures to encourage walking and cycling. The Council will continue to work with partners to deliver the objectives of the plan including supporting a modal shift to sustainable modes of travel. Future iterations of the IDP will set out emerging and agreed proposals. No change.</p>

IDP Education

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120	The plan under-provides both primary and secondary education capacity including a third secondary school to meet the growth needs of the borough	Make provision for adequate school places	<p>In the process of preparing the plan the Council has collaborated extensively with the local education authority (Hertfordshire County Council) regarding education capacity. To address required education need the Council has made a number of education allocations in the plan. In the event that the yield from new development cannot be accommodated on the new allocated school sites, Policy SP14 provides for new school sites to come forward based on a sequential approach to site selection with a requirement that additional school capacity is provided in a location well-related to the communities it is intended to serve.</p> <p>The advice received from the County Council is that there is need over the plan period equivalent to three new secondary schools (20 forms of entry). This could be met through the delivery of two larger secondary schools (up to 10 forms of entry) or three moderately sized secondary schools. If it is not feasible, viable or sustainable to deliver the full secondary education need on these two sites, and if available evidence indicates that a site for a third secondary school to serve the borough is required, Policy SP14 provides for a third site to come forward. It is acknowledged that opportunities to deliver a new secondary school will be limited within the urban area, therefore the policy makes provision for sites to be</p>

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			delivered within the Green Belt where very special circumstances exist. Identification of the site will be required to follow a sequential approach. No change.
69	<p>The plan does not identify sufficient suitable sites to meet the required education need over the plan period</p>	Reduce development to a level that can be supported by the local infrastructure	In the process of preparing the plan the Council has collaborated extensively with the local education authority (Hertfordshire County Council) regarding education capacity. To address required education need the Council has made a number of education allocations in the plan. In the event that the yield from new development cannot be accommodated on the new allocated school sites, Policy SP14 provides for new school sites to come forward based on a sequential approach to site selection with a requirement that additional school capacity is provided in a location well-related to the communities it is intended to serve. No change.
21, 17, 28, 6, 3, 112, 102, 26, 57, 34, 38, 23, 11	<p>Development will further exacerbate existing capacity issues in schools in the south of the borough</p> <p>Cuffley primary school is already at capacity as are schools in Northaw, Little Heath, Potters Bar and Goffs Oak.</p>	Reduce development to a level that can be supported by the local infrastructure	In the process of preparing the plan the Council has consulted extensively with the County Council regarding education capacity in the south of the borough. The County Council has advised the Council that there is limited existing capacity at Welham Green St Mary's Primary School which could just support the growth outlined for Welham Green in the plan. The education strategy in response to proposed development in in Brookman's Park is to expand Brookman's Park Primary School taking the school from its current size of 1.5fe to 2fe. Little Heath is within Potters Bar Primary Planning Area and the County Council considers there is

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			<p>some limited existing capacity across the planning area to meet the needs arising from planned development in Little Heath. The primary education need in Cuffley is considered by the County Council alongside the neighbouring settlement of Goffs Oak which is located within the Borough of Broxbourne but within the same Primary Planning Area. It is considered that the additional school places required due to proposed growth in Cuffley and Goffs Oak could be accommodated through a 1 form of entry expansion of the existing Woodside primary school in Goffs Oak. There are policies within the emerging Broxbourne Local Plan to support this expansion. The expansion of Woodside School will enable children from Goffs Oak to be educated locally, thereby freeing up capacity at Cuffley School for children from Cuffley. No change.</p>
<p>21, 28, 52, 102, 38</p>	<p>Additional education capacity is required in the south of the borough</p> <p>Additional primary school capacity is required in the south of the borough</p> <p>A new secondary school is required in the south of the borough</p>	<p>Reduce development to a level that can be supported by the local infrastructure</p> <p>Deliver new schools to serve increased population</p>	<p>In the process of preparing the plan the Council has consulted extensively with the County Council regarding education capacity in the south of the borough. The County Council has advised the Council that there is limited existing capacity at Welham Green St Mary's Primary School which could just support the growth outlined for Welham Green in the plan. The education strategy in response to proposed development at Brookman's Park is to expand Brookman's Park Primary School taking the school from its current size of 1.5fe to 2fe. Little Heath is within Potters Bar Primary Planning Area and the County Council considers there to</p>

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			<p>be some limited existing capacity across the planning area to meet the needs arising from planned development in Little Heath. The primary education need in Cuffley is considered by the County Council alongside the neighbouring settlement of Goffs Oak which is located within the Borough of Broxbourne but within the same Primary Planning Area. It is considered that the growth proposed in Cuffley could be accommodated through a 1 form of entry expansion of the existing Woodside primary school in Goffs Oak. There are policies within the emerging Broxbourne Local Plan to support this expansion.</p> <p>The new dwellings proposed in and around the southern villages will give rise to around 1.65 forms of entry of new secondary education provision. This could not justify the provision of an additional secondary school on these grounds alone and the dispersed nature of development at these locations means that expansion of existing schools, or the meeting of needs within new secondary schools being planned will represent the best way forward. Villages' education requirements at secondary level need to be considered in relation to adjoining settlements including those beyond the borough boundary in certain instances. No change.</p>

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21, 17, 28, 52, 52, 6, 3, 23, 11	Access from the southern villages to secondary education is difficult and involves significant travelling	Development should be focused in areas with secondary school provision	The new dwellings proposed in and around the southern villages will give rise to around 1.65 forms of entry of new secondary education provision. This could not justify the provision of an additional secondary school on these grounds alone and the dispersed nature of development at these locations means that expansion of existing schools, or the meeting of needs within new secondary schools being planned will represent the best way forward. Villages' education requirements at secondary level need to be considered in relation to adjoining settlements including those beyond the borough boundary in certain instances. No change.
28	It is unclear how education issues will be resolved on the border of Welwyn Hatfield and Broxbourne administrative areas	A coordinated plan should be prepared to address school places in Cuffley and the surrounding area	The County Council plans for school places based on Planning Areas. Where appropriate these will cover settlements within more than one local authority area. When considering primary education need in Cuffley the County Council also considers the neighbouring settlement of Goffs Oak which is located within the Borough of Broxbourne but within the same Primary Planning Area. It is considered that the additional school places required due to proposed growth in Cuffley and Goffs Oak could be accommodated through a 1 form of entry expansion of the existing Woodside primary school in Goffs Oak. There are policies within the emerging Broxbourne Local Plan to support this expansion. The expansion of Woodside School will enable children from Goffs Oak to be educated locally, thereby freeing up capacity at

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			Cuffley School for children from Cuffley. No change.
112	There is too much reliance on section 106 contributions to fund upgraded/new education provision		Policy SP13 of the plan requires developers to contribute to the reasonable costs of enhancing infrastructure or providing new infrastructure, required as a result of their proposals. It is therefore expected that Section 106 Planning Obligations will make a major contribution to the funding of new education provision. Policy SP13 sets out the Council's intent to implement the Community Infrastructure Levy, which will provide a further funding source with potential to contribute to education provision. The Council is working actively with the County Council to establish an appropriate funding strategy which will support delivery of new education provision as well as comply with the requirements of the CIL Regulations 2010 (as amended). In the event that developer contributions do not cover the entire cost of providing new education capacity it will be a matter for the County Council to decide whether they make up the shortfall or whether they can leverage another funding source such as that provided by the Education Funding Agency. No change.
138	Further evidence is needed to demonstrate that Potters Bar schools can accommodate additional school places whilst addressing the future growth within Hertsmere		Little Heath is located within the Potters Bar Primary Planning Area. The County Council have advised that there is some limited existing capacity across the Primary Planning Area to meet the needs arising from development outlined in the plan. In the event that the yield could not be met in the existing schools, initial feasibility suggests that there is expansion

PSDIDP no.	Main issue	Changes sought	WHBC comment
			<p>potential within schools across the Primary Planning Area.</p> <p>Little Heath is located within the Potters Bar Secondary Planning Area together with Welham Green, Brookman's Park and Cuffley. Assumed yield from new housing in these villages equates to 1.65 forms of entry. The County Council have advised that there is potential additional capacity of 2.5 forms of entry to meet this demand. No change.</p>
78	<p>The IDP does not take into account the education needs generated by recently completed or part-completed developments</p>		<p>The advice received from the County Council regarding the requirement for additional school places is based primarily upon the housing trajectory contained in the plan. This covers the period from 2013 to 2032 and includes completions to date during the plan, sites with planning permission, planning applications awaiting determination, plan allocations and a windfall allowance. No change.</p>
120	<p>Whilst adequate school places can be provided in the Green Belt locations, there is a deficit of proposed education capacity in the urban areas of Welwyn Garden City and Hatfield</p>		<p>The IDP notes that that opportunities to deliver new school sites in the urban area are likely to be limited although there are some opportunities to expand some existing schools. The main focus therefore is on delivering new school capacity as part of the strategic development sites which will function as integrated extensions to Hatfield and Welwyn Garden City. This is considered to be an acceptable approach by the County Council.</p>

PSDIDP no.	Main issue	Changes sought	WHBC comment
			<p>The County Council plans for education capacity on the basis of defined Planning Areas which vary for primary and secondary education. The new secondary schools which are proposed are well located in terms of secondary education planning areas. The County Council has identified a need for an additional primary school within central/southern Hatfield. As need in this area is not well served by any of the proposed urban extensions, the Council is working actively with the County Council to find an appropriately located site. The County Council has suggested that, subject to feasibility work, and the site no longer being required for waste management facilities, New Barnfield could potentially help serve this need. No change.</p>
120	<p>The phasing of proposed increases in school capacity will result in a shortfall of school places in the first 10 years of the plan</p>		<p>The Council has collaborated extensively with the County Council to ensure that there are sufficient school places available to meet local demand over the plan period. The County Council has carried out an assessment to understand what existing capacity is currently available, and how much additional capacity will be required to accommodate growth. The County Council has assessed existing schools to establish whether extension is feasible. Where a need for new school provision has been identified the Council has allocated development sites. The education allocations which are included in the plan have been proposed having regard to both the need for additional education capacity and the timing of that need. Where schools are required to be</p>

PSDIDP no.	Main issue	Changes sought	WHBC comment
			delivered in advance of, or alongside, new development the Council will require this in accordance with Policy SP14 of the plan. No change.
78, 137	Expansion of St Mary's Primary School in Welwyn supported versus delivery of new primary school within village		The County Council have indicated that a new primary school is not required in the Welwyn Primary Planning Area as there is some limited existing capacity to accommodate the limited growth proposed. Feasibility work has shown that in the event the yield could not be met through existing capacity there is assumed to be 1 form of entry expansion potential at Welwyn St Mary's Primary School. No change.

IDP Health

PSDIDP no.	Main issue	Changes sought	WHBC comment
18, 29, 32, 113, 129	<p>Existing healthcare facilities are oversubscribed</p> <p>Healthcare facilities in the south of the borough are over capacity</p> <p>Healthcare facilities in Welwyn are over capacity</p>	<p>Necessary health infrastructure needs to be put in place in advance of, or alongside, new development</p>	<p>The Council has consulted extensively with NHS England and East and North Hertfordshire Clinical Commissioning Group to understand the capacity of existing healthcare infrastructure and the requirement for additional capacity to serve proposed growth.</p> <p>NHS England have supplied information to the Council regarding capacity at the borough's General Practice facilities. There are two General Practice facilities in the south of the borough. Potterells Medical Centre is currently "very constrained" whilst Cuffley Medical Practice is "constrained". In the north of the borough, in Welwyn, Bridge Cottage Surgery is "constrained".</p> <p>In line with Policy SP13 of the plan the Council will expect developers to contribute to the reasonable costs of enhancing existing infrastructure or providing new infrastructure required as a result of their proposals. Contributions will therefore be sought from development towards the costs of enhancing the capacity of these practices where sufficient existing capacity does not exist to serve additional patients. No change.</p>

PSDIDP no.	Main issue	Changes sought	WHBC comment
20, 131	Planned upgrades to health facilities are insufficient to support new development		The Council has engaged with a multitude of agencies primary and secondary healthcare providers to understand what provision will be needed as a result of proposed growth. The IDP sets out the additional facilities required based on a formula approach. The Council continues to engage with healthcare providers in regard to the planning of upgraded and new infrastructure to ensure that provision is delivered on a timely basis and in appropriate locations. Policies SP19 and SP22 of the plan set out a requirement for healthcare facilities to be provided at Birchall Garden Suburb (WGC5) and North West Hatfield (Hat1). No change.
87, 129	A new hospital is required to serve the local population		The IDP indicates the additional secondary healthcare provision needed as a result of growth across the 5 districts covered by the East and North Hertfordshire Clinical Commissioning Group. At this stage the Council has not been advised that a new hospital is required, but it will continue to engage with secondary healthcare providers in order to emphasise the importance of medium to long term strategic planning, and ensure that secondary healthcare requirements are built into the wider strategic planning and planning obligations process. No change.
18, 29,32 50, 87, 91, 5, 4, 104, 12, 22, 39	Cuffley doctors' surgery is already over-subscribed. Additional development will further exacerbate issues accessing healthcare.	Reduce level of development to that which can be supported by local infrastructure.	The Council has consulted extensively with NHS England and East and North Hertfordshire Clinical Commissioning Group to understand the capacity of existing healthcare infrastructure and the requirement for additional capacity to serve proposed growth.

PSDIDP no.	Main issue	Changes sought	WHBC comment
		Deliver adequate healthcare infrastructure to support new development	NHS England have indicated that Cuffley Medical Practice is constrained. This means that there is some limited existing capacity to support additional patient numbers. In line with Policy SP13 of the plan the Council will expect developers to contribute to the reasonable costs of enhancing existing infrastructure or providing new infrastructure required as a result of their proposals. Contributions will therefore be sought from development in Cuffley towards the cost of enhancing Cuffley Medical Practice. No change.
29, 131, 50, 87, 91, 5, 4, 12, 22, 39	Villages in the south of the Borough are a substantial distance from the nearest Accident and Emergency facilities	Open a local Accident and Emergency department	It is recognised that villages in the south of the borough are a considerable distance from the nearest Accident and Emergency facilities. The new dwellings proposed in and around the southern villages will create additional demand for acute healthcare, however this alone could not justify the provision of a new local accident and emergency department. The dispersed nature of development in the south of the borough means that expansion of existing healthcare facilities will represent the best way forward. No change.
113, 140, 35	The plan makes no provision for healthcare provision in relation to Little Heath	Most residents will use health facilities in Potters Bar so CIL or planning obligations should be directed to infrastructure in Potters Bar.	It is acknowledged that residents of Little Heath are likely to use health facilities in Potters Bar, which is within Hertsmere Borough. When applications are submitted for new development in Little Heath the Council will give consideration to the need for upgraded or new supporting infrastructure in line with Policy SP13 of the plan. The spending of developer contributions can then be targeted accordingly. No change.

IDP Emergency Services

PSDIDP no.	Main issue	Changes sought	WHBC comment
40, 51	Development should not be proposed in areas which are a substantial distance from Emergency Services		<p>The primary focus for new development is in and around the two towns of Welwyn Garden City and Hatfield where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities, and to create new neighbourhoods with supporting infrastructure. The secondary focus for development will be in and around the excluded villages at a more limited scale, compatible with the more limited range of job opportunities, shops, services and other facilities available in these locations. Through the process of preparing the plan the Council has consulted on a variety of occasions with the emergency services (Police, Fire Service and Ambulance Service). No objection has been raised by any services to the location of proposed growth. No change.</p>
76	Development will put even greater pressure on emergency services		<p>It is recognised that the proposed growth will place additional pressure on emergency services. No specific infrastructure costs have been identified by any of the emergency services providers although Hertfordshire Constabulary has indicated its wish to secure access to developer contributions in future in the light of diminishing capital programmes to meet any future operational needs. The Council will continue to engage with the emergency services over their needs including potential funding from Section 106 or CIL. No change.</p>

IDP Housing

PSDIDP no.	Main issue	Changes sought	WHBC comment
80	<p>Infrastructure must be delivered in time to serve new development.</p> <p>Infrastructure must be provided in the early part of the plan period to serve proposed development in Welwyn and the surrounding area.</p>		<p>The IDP recognises the need to deliver supporting infrastructure on a timely basis. Policy SP14 of the plan requires that supporting infrastructure should be provided in advance of, or alongside, developments, unless there is sufficient existing capacity. The Council will continue to engage with infrastructure providers regarding the planning, funding and delivery of infrastructure which is required to support new development. No change.</p>

IDP Green Infrastructure

PSDISP no.	Main issue	Changes sought	WHBC comment
88, 92	The proposed loss of Green Belt land is contrary to the Council's green infrastructure objectives	Do not develop Green Belt sites	The Council's justification for building on sustainable locations within the Green Belt is set out in paragraph 5.7 of the plan. Green Belt boundaries have been amended, where exceptional circumstances existed, in order to achieve sustainable development in the borough. No change.
99	The Council's Green Corridor Strategic Framework Plan is not a robust basis for green infrastructure planning		The preparation of a Green Corridor Strategic Framework Plan is consistent with the requirements of the National Planning Policy Framework which is that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of green infrastructure. No change.
142	The IDP should state a minimum buffer alongside all watercourses	Para 10.14 should state that a minimum of an 8 metre buffer (from the top of bank) of natural (not mown) vegetation is to be established alongside all watercourses (and 5 metre buffer around ponds and lakes).	Update IDP to reflect that a minimum buffer along watercourses will be a key deliverable of the Green Corridor. Update required.
142	The Environment Agency has not been directly consulted on projects proposed along the Lee and Mimram.	The IDP should state that the Council will work with the catchment partnership to develop projects	Update IDP to refer to key partners in the River Valleys project. Update required.

PSDISP no.	Main issue	Changes sought	WHBC comment
		<p>along the Lee and Mimram and ensure a partnership and catchment based approach to the work. The Environment Agency and the Herts and Middlesex Wildlife Trust (as catchment hosts) should be an integral part of the consultation stages of these projects.</p>	
142	<p>The Environment Agency is a potential funding body</p>	<p>The Environment Agency is a potential funding body, particularly for river improvement works and should be added to the list of funding options in para 10.20</p>	<p>Update IDP to identify the Environment Agency as a potential funding body. Update required.</p>

IDP Social Infrastructure

PSDIDP no.	Main issue	Changes sought	WHBC comment
72	The proposals for indoor and outdoor sports facilities are welcomed in general terms as well as the need to make provision for the additional community sports facility needs generated by new development.		Comments noted. No update.
72	The prioritised approach to delivery is supported. This is essential in view of the limited resources available to implement all of the potential projects required to address identified needs.		Comments noted. No update.
72	The Council's Sports Facilities Study (2011), on which the subsequent Facilities Strategy (2012) was based, used data that was collected in 2009-10.	It is recommended that the Council commits to a review of the evidence base following adoption of the local plan in order to ensure that the IDP remains robust as well as the policies in the local plan. In the interim, it is recommended that the Sports Facility Strategy action plan is reviewed and updated following consultation with key stakeholders such as facility	Comments noted. The Council is proposing to initiate an update to the Sports Facilities Study in 2017. No change.

PSDIDP no.	Main issue	Changes sought	WHBC comment
		operators and sports governing bodies.	
72	Some of the proposals for facilities required to address the identified need are generic in nature (e.g. 3-4 new indoor bowls rinks and 14 new sports pitches). If these proposals remain generic this is likely to cause implementation difficulties through CIL or s.106.	Future IDPs should be as specific as possible in terms of identifying projects	Comments noted. The update of the Council's Sports Facilities Study will consider need in greater detail to support subsequent implementation. No update.
72	The proposals for a number of the facility proposals to be met in the new secondary schools planned in Welwyn Garden City and Hatfield are welcomed in principle. However, these schools are only likely to be delivered towards the end of the plan period and may therefore not be able to meet short to medium term needs.	Alternative projects should be identified for meeting short to medium term needs	The Council notes that the sports facilities proposed in the new secondary schools may not be delivered until later in the plan period. In the meantime, the Council will focus on delivering improvements to existing facilities. Contributions may be sought from developments to enhance facilities where demand from population growth has the potential to impact upon service provision. No update.
72	The projects identified in the IDP do not appear to account for sports projects in the pipeline that have evolved since the 2012 Facilities Strategy was published.		Update IDP to reflect latest sports facility proposals. Update required.
63	The Council has not planned sufficiently for a replacement airfield at Panshanger.	The Council must demonstrate it has planned positively for a replacement airfield at Panshanger	Policy SP18 of the plan provides that the masterplan which will guide the redevelopment of Panshanger allows the opportunity for a realigned grass runway on land to the north of the Green Belt boundary. The feasibility of a realigned runway will be investigated in detail as part of the preparation of the Masterplan. No change.

PSDIDP no.	Main issue	Changes sought	WHBC comment
63	There is no acknowledgement of potential loss of facilities (i.e. Panshanger Aerodrome/ dry ski slope at Gosling Sports Park).		<p>Policy SP18 of the plan provides that the masterplan which will guide the redevelopment of Panshanger allows the opportunity for a realigned grass runway on land to the north of the Green Belt boundary. The feasibility of a realigned runway will be investigated in detail as part of the preparation of the Masterplan. No change.</p> <p>Update IDP to reflect feedback from Sport England in relation to part re-development of Gosling Sports Park. Update required.</p>
85	Panshanger airfield is a valuable resource which should continue being used for aviation purposes	Retain current use of Panshanger	<p>The Council recognises that Panshanger Aerodrome is a facility which is highly valued by the public. Policy SP18 therefore provides that the masterplan which must be prepared to guide the redevelopment of Panshanger allows the opportunity for a realigned grass runway on land to the north of the Green Belt boundary. No change.</p>

IDP Waste and Recycling

PSDISP no.	Main issue	Changes sought	WHBC comment
44	There are limited waste and recycling facilities in Cuffley and the surrounding area		There are two Household Waste Recycling Centres located within a reasonable distance of Cuffley: Cole Green household waste recycling centre in Welwyn Hatfield and Turnford household waste recycling centre in Cheshunt. No change.

IDP Utilities

PSDIDP no.	Main issue	Changes sought	WHBC comment
67	Waste should not be listed as a source of renewable energy	Amend para 13.11. The sentence <i>"There are a number of potential sources of renewable energy and waste"</i> , should be replaced by the renewable energy definition in the Glossary to the National Planning Policy framework: <i>"Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat."</i>	Amend IDP to reflect that waste is only a partially renewable energy source. Update required.
89, 93, 61	The Hertfordshire Water Study has not yet been completed and therefore the plan has not been able to take account of its findings	Complete the Hertfordshire Water Study and ensure that the plan is informed by it.	The Hertfordshire Water Study is currently being finalised and will inform future iterations of the IDP. At the request of Thames Water a minor modification is proposed to the supporting text of the plan stating that water and wastewater infrastructure requirements will also be informed by the Hertfordshire Water Study. No change.

PSDIDP no.	Main issue	Changes sought	WHBC comment
118	<p>It is unknown whether the IDP takes account of industrial water usage</p>		<p>Affinity Water, who supply water to Welwyn Hatfield borough, are required to produce a Water Resource Management Plan (WRMP) every 5 years. A WRMP must show how water companies will balance the demand for water with the available supply for the next 25 years, accounting for both domestic (household) and commercial growth during that period. Affinity published its WRMP for the period 2015 to 2040 in June 2014, following approval by the Secretary of State. The company consulted with all local authorities in its operating region including Welwyn Hatfield to request their assessment of growth. Affinity Water used the information obtained from Welwyn Hatfield to derive their overall forecast. The WRMP meets the planned demand for water generated by proposed housing and commercial growth. No change.</p>
<p>9, 36, 58, 106, 97, 114, 115, 117, 119, 125, 127, 61</p>	<p>Sewerage infrastructure is inadequate to support new development</p> <p>Sewerage facilities serving the south of the borough are at capacity</p> <p>Rye Meads wastewater treatment works is at full capacity</p> <p>There is insufficient sewerage capacity to support development at Panshanger (WGC4) and other growth locations in Welwyn Garden City and the</p>	<p>Growth should be directed to other areas with greater sewerage capacity</p>	<p>As part of preparing the plan the Council has liaised extensively with Thames Water Utilities regarding wastewater/sewerage. The IDP contains information on existing provision and future service provision. This is summarised in paras 13.19 to 13.24 of the plan.</p> <p>Thames Water has identified a number of issues with sewage treatment works that serve the borough. Plans exist to upgrade Deephams sewage treatment works (which serves the Cuffley area) during 2017 to address current constraints. Issues have also been identified</p>

PSDIDP no.	Main issue	Changes sought	WHBC comment
	surrounding area unless the Rye Mead wastewater treatment works is upgraded and a new sewer is delivered providing a direct connection to the Rye Meads Southern Outfall.	Reduce level of growth to an amount which can be served by sewerage infrastructure	<p>with Rye Meads sewage treatment works. Thames Water are planning to deliver an interim solution by mid-2017 which will increase capacity to a level sufficient for all potential growth planned within the catchment until at least 2026.</p> <p>In the longer term Thames Water have identified that to deliver growth around Welwyn Garden City and Hatfield is likely to require a number of significant infrastructure upgrades including a new direct connection to the Southern Outfall Sewer serving Rye Meads. However at the present time Thames Water have advised that the options to support growth are not necessarily defined schemes as the exact location and scale of upgrades will be determined based on the location, scale and phasing of development within the borough and adjoining local authorities. All sites which are allocated in the plan will be required to provide for the necessary utilities infrastructure. This is explicitly set out in policies allocating strategic development sites, including Panshanger (WGC4).</p> <p>Additional clarity will be added into the supporting text of the plan at the request of Thames Water to clarify requirements in respect of wastewater infrastructure to support new development. No change.</p>
61	The clean water supply is not sufficient to support the planned level of growth	Reduce growth to a level which can be	Welwyn Hatfield is supplied with drinking water by Affinity Water. The supply to the

PSDIDP no.	Main issue	Changes sought	WHBC comment
		supplied with clean water	<p>area is well reinforced, with a number of local sources, an integrated pipe network and strategic transfers in place to maintain an adequate security of supply.</p> <p>In overall terms, Affinity Water predict no major constraints to supplying Welwyn Hatfield with drinking water although it is noted that this could change in the future, for example if the Environment Agency enforce further sustainability reductions. No change.</p>
36, 58	The electrical power supply service is at capacity in the south of the borough	Do not allow development in the south of the borough until infrastructure issues are addressed	<p>The Council has consulted with UK Power Networks who are responsible for the electricity distribution network in the borough. UK Power Networks have indicated that the primary networks in Welwyn Garden City all have capacity, and that there is also capacity at the sub-station at Cuffley. However they have identified capacity issues at Hatfield, and have stated that further development in Hatfield could require the provision of a new primary sub-station and cabling in this area.</p> <p>UK Power Networks have advised that there are numerous projects currently being undertaken to expand the existing electricity network infrastructure with a view to increasing capacity and supplying new potential demands. The Council will continue to engage with UK Power Networks to ensure that new development is supported by appropriate utilities infrastructure. No change.</p>

IDP Infrastructure Funding and Delivery

PSDIDP no.	Main issue	Changes sought	WHBC comment
141	Proposed development in Little Heath will create demand for services in Potters Bar, which is within the administrative area of Hertsmere	A commitment to support the delivery of infrastructure and ensure that any s106 or future CIL monies from developments in Little Heath are primarily directed to services in Potters Bar	The Council recognises that development in Little Heath may impact upon infrastructure within Potters Bar, which is within Hertsmere Borough. The Council will engage with Hertsmere Borough Council, the County Council and infrastructure providers to ensure that new development in Little Heath is supported by sufficient infrastructure and services. No change.
130, 132	It is uncertain how key infrastructure necessary to support an increase in population will be funded (particularly in relation to hospitals).	The plan should not be adopted unless it can be demonstrated that key infrastructure, particularly new hospital provision, will be delivered in advance of, or alongside new development. Developers should be charged a local levy of £20,000 per dwelling in advance to fund the IDP shortfall.	The IDP identifies a range of funding sources which could contribute to the cost of delivering additional healthcare services to meet the needs of an increased population. The IDP notes that limited availability of information at this stage makes a comprehensive assessment of future healthcare requirements difficult. The Council will continue to engage with healthcare providers in order to emphasise the importance of medium to long term strategic planning, and to ensure that healthcare requirements are built into the wider strategic planning and planning obligations process. No change.
81	It is unclear in the IDP how Section 106 and CIL will contribute to funding of necessary infrastructure		The IDP identifies Section 106 and CIL as two key funding source for the delivery of new and upgraded infrastructure. The Council is currently preparing a Preliminary Draft Charging Schedule

PSDIDP no.	Main issue	Changes sought	WHBC comment
			for consultation. At such time as it is clear what the potential revenue from CIL could be over the plan period then the IDP will be updated to reflect this. No change.
81	The IDP does not explain in sufficient detail how CIL and S106 operate and their specific purposes	The IDP should include a section that explains the scope of, and relationship between, s106 and CIL.	Paragraphs 2.13-2.18 of the IDP sets out how CIL and S106 are interrelated. Further detail is provided with the Council's Planning Obligations SPD. The Council will set out in its Preliminary Draft Charging Schedule how the two mechanisms will be used in a complementary way. No change.
81	The significant delay in implementing CIL	The IDP should explain why CIL will not be implemented until late 2017 or 2018.	The starting point for implementing CIL is to have an up to date local plan. Now that the borough's plan is progressing towards examination the Council has begun the process of implementing CIL. The Council is required to hold two statutory consultations on its proposed CIL charging rates and the proposed schedule must also be subject to an independent examination. It will therefore take a minimum of 12-18 months to implement CIL. No change.
81	The lack of a joined up approach between infrastructure providers to deliver essential supporting infrastructure	The Council should work with and encourage infrastructure providers to consider infrastructure needs over the same timeframe as the plan.	The Council notes that the differing planning horizons of infrastructure providers introduce complexity to planning for, funding and delivering infrastructure over a 15 year plan period. The Council has engaged with infrastructure providers, and will continue to do so, in order to emphasise the importance of medium to long term strategic planning, and to ensure that infrastructure requirements are built into the wider strategic planning and planning obligations process. No change.

IDP Appendix 1 Infrastructure Delivery Schedule

PSDIDP no.	Main issue	Changes sought	WHBC comment
47	It is unclear how the projects listed in the delivery schedule will be funded		<p>The IDP identifies a range of funding sources which could contribute to the cost of delivering upgraded and new infrastructure to support new development. Policy SP13 of the plan sets out an expectation that developers should contribute towards the reasonable costs of enhancing existing infrastructure or providing new infrastructure required as a result of their proposals. The Council will also lobby government, their agencies and public infrastructure providers to secure funding for the delivery of essential supporting infrastructure.</p> <p>No change.</p>
47	It is uncertain whether the bodies responsible for delivery of infrastructure will be able to deliver the items/projects in the schedule		<p>The Council has engaged extensively with infrastructure providers to establish what infrastructure improvements will need to be delivered to support new development. The delivery of infrastructure will ultimately depend upon a multitude of factors, however the Council is committed to ensuring that necessary infrastructure does get delivered, and that it is appropriately planned, meets the identified need and that funding is in place to secure it on a timely basis. No change.</p>