

WELWYN HATFIELD BOROUGH COUNCIL  
CABINET HOUSING AND PLANNING PANEL – 9 FEBRUARY 2017  
REPORT OF THE EXECUTIVE DIRECTOR (PUBLIC PROTECTION, PLANNING AND GOVERNANCE)

LOCAL PLAN UPDATE

- 1.1 Consultation on the Draft Local Plan Proposed Submission document, Policies Map, Sustainability Appraisal, Habitats Regulations Assessment (HRA) and Draft Infrastructure Delivery Plan took place between 30th August and 24th October 2016. Over 3,000 representations were received to the consultation documents.
- 1.2 The aim of this report is to provide the Panel with an overview of the key issues raised during the consultation, prior to next meeting when a full list of the key issues and a schedule of proposed modifications will be presented to the Panel, for members to decide whether to agree to submit the documents to the Secretary of State.
- 1.3 All of the representations are available to view on the Council's website – <http://consult.welhat.gov.uk/portal>.

**2 Recommendation**

- 2.1 That the Panel note the contents of this report and the next steps for the preparation of the Local Plan.

**3 Background**

- 3.1 Just over 3000 comments have been made on the 5 consultation documents, as follows:
  - 2,190 comments on the Draft Local Plan Proposed Submission document from 1,245 individuals and organisations;
  - 743 comments on the Draft Local Plan Proposed Submission Policies Map from 734 individuals and organisations
  - 140 comments on the Draft Infrastructure Delivery Plan from 59 individuals and organisations;
  - 41 comments on the Sustainability Appraisal and Habitat Regulations Assessment of the consultation document from 20 individuals and organisations.
- 3.2 In addition during the consultation period one petition was received with 493 signatures objecting to the allocation of a site for residential development in the Green Belt in Woolmer Green and proposing that Entech House be allocated for residential rather than employment development.

## Means of consultation

- 3.3 A variety of consultation methods were used to raise awareness of the consultation and engage with key stakeholders, interest groups and the wider community in accordance with the Statement of Community Involvement. The methods used included:
- Advertisements in various local papers including the Welwyn Hatfield Times, Herts Advertiser and Hertfordshire Mercury which cover areas both within and outside the borough, supplemented by press releases and media briefings to generate additional content;
  - Radio interview with the Executive Member for Planning, broadcast on local station Bob FM;
  - Email or letter notification to the several thousands of individuals registered on the Council's consultation database;
  - Email or letter notification to town/parish councils and residents groups including those lying just outside the borough who might consider themselves to be affected by proposals within the borough.
  - The inclusion of a half page feature on the consultation within the summer edition of 'Life', the Council's magazine circulated periodically to all households in the borough;
  - Prominent placement of information about the proposals on the Council's website homepage for the duration of the consultation;
  - Further advertisement of the consultation through the Council's social media channels;
  - A series of consultation drop-in events held in public venues throughout the borough.
- 3.4 The consultation documents, supporting documents and a summary and guide to the proposals were all available to view online, at the Council's offices and at libraries, parish and town councils throughout the borough. They were also available at consultation drop-in events held around the borough throughout the consultation period.
- 3.5 In total, six events took place – a number of officers and councillors were available at each to explain the proposals. Across the six events, it is estimated that approximately 700 people took the opportunity to view and discuss the proposals. The locations of events were:
- Panshanger, Welwyn Garden City (Fairway Tavern)
  - Hatfield (Birchwood Leisure Centre)
  - Hatfield Garden Village (Green Lanes Primary School)
  - Welwyn (Civic Centre)
  - Brookmans Park (United Reformed Church)

- Cuffley (Cuffley Hall)

## 4 Explanation

### Emerging main issues raised by the consultation

- 4.1 A more comprehensive list of main issues is in the process of being drawn up, along with officer recommendations as to whether any modifications need be made to the Local Plan as a result of the issues raised. It is intended that these will be presented to the next meeting of this Panel on 16 March 2017.
- 4.2 The statement of main issues is one of the documents required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to be submitted to the Secretary of State. It needs to identify the issues relating to legal and the soundness tests.
- 4.3 The legal tests are as follows:
- Statement of Community Involvement (SCI) and regulations
  - Sustainability Appraisal and Habitat Regulations Assessment
  - Duty to Co-operate
  - Local Development Scheme
- 4.4 The soundness tests are as follows:
- Positively prepared
  - Justified
  - Effective
  - Compliant with the National Planning Policy Framework
- 4.5 The key themes raised in the representations are discussed in the following paragraphs.

### Not in conformity with the Statement of Community Involvement or the Regulations

- 4.6 The majority of representations either consider the Draft Local Plan Proposed Submission document met the legal tests for its preparation or did not respond to this question. The most frequently referred to reasons for not meeting a legal test relate to consultation and in particular the lack of previous consultation on some sites which had not been included in any previous round of consultation and the encouragement for early engagement which is set out in the National Planning Policy Framework. Officers consider that neither the Statement of Community Involvement nor the regulations require this.
- 4.7 Other respondents consider that residents have not had sufficient opportunity to be involved in the process of plan making and that representations are not listened to.

## Sustainability Appraisal and Habitats Regulations Assessment

- 4.8 A number of representations consider that the Sustainability Appraisal and the HRA have not been prepared properly. However no concerns have been raised by the statutory consultees. The representations have been referred to our consultants for comments so that if there are any issues these can be remedied before submission.
- 4.9 A number of respondents consider that the Sustainability Appraisal has not considered all the reasonable alternatives to the strategy and sites set out in the plan.
- 4.10 Some representations consider that more information should be provided on the environmental effects. Others consider that insufficient account has been taken of cumulative impact. One respondent considers that the benefit of the proximity of Site CUF5 to an anaerobic digester has not been sufficiently taken into account.

## Duty to Cooperate

- 4.11 A number of respondents have referred to the failure to comply with the Duty to Co-operate (DTC). Importantly however only one of these (St Albans City and District Council) is a DTC body. St Albans has however expressed its willingness to have further DTC discussions prior to submission and it is hoped that their concerns can be addressed prior to submission. They have also indicated that their duty to co-operate concerns are based on soundness rather than the legal test.
- 4.12 It will be important to have as many Statements of Common Ground or Memoranda of Understanding in place with as many DTC bodies as possible prior to submission. This is particularly important as a number of them made no representations to the Plan. A Statement of Common Ground sets out the areas of agreement between two or more parties so that the examination can focus on the areas of disagreement. Memoranda of Understanding set out how DTC bodies intend to work together on key issues but they are not legally binding, they can also cover areas of agreement as in a Statement of Common Ground.
- 4.13 The Home Builders Federation (HBF) consider we appear to have met the Duty to Co-Operate but that the plan is unsound because we have not identified how unmet development needs will be met and that we should have sought assistance from other areas, in particular Broxbourne, Hertsmere and St Albans . Others consider that we have failed the Duty to Co-operate because we have not engaged sufficiently with other bodies to address unmet development needs.
- 4.14 The promoters of Roehyde to the south-west of the Hatfield South A1(M) and A414 junction consider that the DTC has not been met with St Albans Council with regards to the assessment of that site which has been promoted for employment uses.

## Tests of Soundness

- 4.15 The majority of respondents consider the plan to be unsound with approximately 60% of responses to the draft plan requesting that a change be made. There is however no consensus about what those changes should be, with responses

promoting opposing views as to what changes need to be made to make the plan sound.

- 4.16 A number of key themes are emerging from the representations which are discussed below.

#### Growth

- 4.17 In general there is a lack of consensus relating to what should be the approach to how much housing, employment and other growth and where it should go. Respondents consider that either the figures are too high (generally residents) or too low (generally land owners and developers). This applies to both the Objective Assessment of Housing Need (OAN) and the housing target set in the plan.
- 4.18 Reference has been made to the need to take into account the new 2014 household projections which is likely to result in a higher OAN.
- 4.19 The Greater London Authority (GLA) welcomes the Council's approach to the review of the OAN and consideration of historic migration trends, however considers that the Council may wish to reassure itself that its housing target meets the NPPF's requirements for meeting housing need.
- 4.20 The Hertfordshire Local Enterprise Partnership consider the Plan is sound and is broadly supportive of the approach for the economy but expresses concern that the OAN is not being met. North Herts District Council also consider that the Plan is sound but has expressed a similar concern that housing and jobs are not in alignment and questions whether the Local Plan should be prioritising the protection of employment land over meeting the Objective Assessment of Housing Need.
- 4.21 St Albans City and District Council consider that the jobs figures target is too high and that the OAN is poorly justified and inflated as a consequence. Others have argued that the jobs figures should be higher and that more land for employment is required.
- 4.22 Three Rivers District Council consider the housing target will meet the level of need set out in the Strategic Housing Market Assessment based on the 2012 household projections.
- 4.23 The Home Builders Federation (HBF) consider the Strategic Housing Market Assessment to be robust but consider that the OAN should be the upper end of the range. They consider the Plan to be unsound because a lower target has been set and no arrangement has been put in place for meeting the shortfall.
- 4.24 Broxbourne Borough Council have confirmed that they are unlikely to be able to meet any of Welwyn Hatfield's housing development shortfall.
- 4.25 A number of respondents consider the housing target is too high because of the environmental impacts that this will create in an area of water stress. Others consider it will not be possible to deliver the necessary supporting infrastructure in particular when the cumulative impacts of growth from outside the borough are taken into account.

- 4.26 There is also criticism of the split housing target, which is lower for the first five years, and therefore it is argued that the Council does not have a five year land supply. Furthermore there is some debate about whether there should be a 5% or 20% buffer added to the five year land supply.
- 4.27 The alternative targets put forward by respondents range from 6,800 dwellings to 20,520 dwellings plus a further 4,100 dwellings for a 20% buffer.
- 4.28 With regards to retailing only a few respondents have responded on the quantum and in the main consider it to be too high and query whether sufficient account has been taken of the growth in internet shopping.
- 4.29 Hertsmere Borough Council broadly support the provision for Gypsy and Traveller provision but have questioned whether the target is to meet the Government's new definition and if it does they query how the need for those who no longer travel will be met. Three Rivers District Council also support the approach on the basis we fulfil our obligation to review evidence on need during the plan period.
- 4.30 Other representations consider the assessed need for Gypsy and Traveller pitches is either too high or too low.

#### Windfall

- 4.31 There are mixed views on the calculation of the contribution that windfall development will make to overall housing land supply. Some respondents have argued that the figures are too high others that they are too low. Further criticism is made that the Plan is over reliant on windfall allowance of 1,315 dwellings.
- 4.32 Hertfordshire County Council consider that the policy on windfall development is unsound because no reference has been made to the need to consult the Minerals Planning Authority on planning applications which lie within the Mineral Consultation Area prior to permission being granted in order to prevent minerals sterilisation.

#### Settlement Strategy

- 4.33 Broxbourne Borough Council have supported the development strategy set out in the Plan. There is some support for the settlement hierarchy but not with the levels of growth ascribed to those settlements. Some consider the towns have too much growth and some that the villages have too much growth.
- 4.34 There are objections to the inclusion of a new settlement in the hierarchy whilst others believe there should have been more consideration given to the creation of a new settlement.
- 4.35 The Home Builders Federation believe the strategy is unjustified as it prevents the smaller settlements which currently lie in the Green Belt from making a contribution. They also consider that the allocations for Brookmans Park, Digswell, Cuffley and Welham Green are too low as they have railway stations.
- 4.36 A number of sites dismissed in the Strategic Housing Land Availability Assessment (SHLAA) because they lie within washed over settlements and therefore do not accord with the settlement strategy have been resubmitted by their promoters.

## Green Belt

- 4.37 The release of land from the Green Belt continues to be controversial. St Albans, City and District Council, the Campaign to Protect Rural England (Hertfordshire) and a number of other respondents consider that exceptional circumstances have not been demonstrated and that urban capacity could be increased.
- 4.38 Historic England consider that large areas of open space that lie within the strategic sites should be designated as Green Belt rather than urban open land.
- 4.39 Hertfordshire County Council have objected on the basis that the allocated waste sites have not been removed from the Green Belt and have asked for amendments to be made to the Policies Map accordingly.
- 4.40 North Herts District Council have commented on the use of the Local Purpose in the site selection process which they consider is not in accordance with national policy whereas other respondents consider that the national purpose applies equally to the gap between village and town as it does to the gap between towns.

## Infrastructure

- 4.41 Thames Water support the approach but have asked some wording to be added to the supporting text to refer to the Herts Water Project. In addition the lack of infrastructure to support growth is often cited as a reason why sites should not come forward.
- 4.42 Hertfordshire County Council (Property) has offered support for dealing with cross-boundary infrastructure issues particularly with regard to Birchall Garden Suburb.
- 4.43 Hertsmere Borough Council consider that growth proposals in Little Heath are likely to impact on infrastructure in Potters Bar and have therefore asked that Community Infrastructure Levy (CIL) and Section 106 planning contributions should be directed towards facilities in Potters Bar and that the policy be amended to state this.
- 4.44 Hertfordshire County Council (Environment) refer to the transport modelling work which has been carried including the testing of mitigation measures which provide noticeable relief to congestion. Further work to test options for A1(M) Junction 4 at Hatfield North is on-going but they point to the need to deliver modal shift at this location. The modelling work carried out does indicate that the mitigation measures would improve throughput and capacity at this junction.
- 4.45 North Herts District Council is supportive of the approach and the detail in the Infrastructure Delivery Plan. They would welcome further discussion on the A1(M). They support the acknowledgement of primary school provision attributed to Codicote and Knebworth and the transport modelling that has been done to date but note that there may be a need for further modelling.
- 4.46 Broxbourne Borough Council has expressed a willingness to share transport evidence to ensure any cross boundary issues are well planned for. They refer to congestion on the B156 which they are looking to address in their transport strategy and that the increased capacity at Woodside School should reduce peak time movement between Goffs Oak and Cuffley School.

- 4.47 The Education Funding Agency (EFA) welcomes the support in the Plan and the Infrastructure Delivery Plan to the provision of schools as necessary infrastructure. Both the EFA and Hertfordshire County Council point out the difficulty of finding sites for schools in the urban areas and consider the sequential policy set out in the plan should better reflect that. They both support the allocation of land within the strategic sites for primary and secondary schools.
- 4.48 Hertfordshire County Council go on to raise a soundness objection on the basis that either a site for a third school has not been identified or provision has not been made for a 10 form entry secondary school at North West Hatfield which would be required early in the plan period.
- 4.49 North Mymms Parish Council has expressed concern that insufficient provision is being made in the south of the borough for school places and have drawn attention to the lack of capacity at the doctor's surgery. Community Infrastructure Levy (CIL) must be directed to the community it is intended to benefit and must not be reallocated.
- 4.50 Cuffley Parish Council are concerned that insufficient account has been taken of growth proposals in Broxbourne and cumulative impacts. They have submitted transport evidence which is being reviewed by Hertfordshire County Council.
- 4.51 Concern has also been expressed that the Plan does not say how existing infrastructure deficiencies will be addressed.

#### Protection of the Environment

- 4.52 Hertfordshire County Council welcomes the policies protecting the environment but have asked for a reference to be made to Government's Biodiversity White Paper. They consider that there should be cross references in other policies in the Plan to Green Infrastructure.
- 4.53 Herts and Middlesex Wildlife Trust have raised concerns that we have not required developers to undertake an Ecological Assessment to quantify the level of biodiversity of each site and net/gain loss after development, and whether mitigations/compensation adequately offset this loss. They recommending reference to a Natural England/DEFRA biodiversity impact calculator in the Plan.
- 4.54 The Environment Agency has asked for specific reference be made in a number of places in the Plan to need for an 8 metre wide buffer corridor along river corridors and that specific reference is made to River Basin Management Plans and the Water Framework Directive.

#### Green Corridor

- 4.55 Historic England welcomes the policy on Green Infrastructure and the strategic green corridor however they consider the section going through South East Welwyn Garden City site SDS2 (WGC5) should be wider.
- 4.56 Sport England similarly supports the policy but would like the wording strengthened
- 4.57 St Albans City and District Council also support the policy but consider that Ellenbrook Country Park should be identified on the Policies Map as well as the Key Diagram.

- 4.58 Tarmac object to the preparation of a Supplementary Planning Document (SPD) for the green corridor which they consider will hinder the delivery of their site.
- 4.59 Others are concerned that insufficient information has been obtained on the ecology of the area and that there is insufficient detail in the Local Plan on maintenance and delivery and the routes of paths.
- 4.60 The Hertfordshire Garden Trust consider that views to and from heritage assets have not been sufficiently taken into account.

#### Historic Environment

- 4.61 Historic England supports the inclusion of both strategic and development management policies which seek the protection, enhancement and management of the historic environment. Gascoyne Cecil Estates and Hertfordshire Gardens Trust consider the policies on the historic environment are inadequate and have proposed alternative wording. Hertfordshire County Council have asked for some minor changes to address the potential for archaeology on non-designated sites.
- 4.62 Woolmer Green Parish Council, Historic England and the Welwyn Garden City Society consider that reference should be made in the Plan to locally listed buildings.
- 4.63 Gascoyne Cecil Estates consider that there should be a specific policy relating to Hatfield House and its setting.
- 4.64 Historic England consider that Heritage Impact Assessments for North West Hatfield and Symondshyde should include an assessment of the impact on Brocket Hall.

#### Urban Open Land

- 4.65 Hertfordshire County Council has objected to the retention of a number of Urban Open Land designations on land in their ownership.
- 4.66 Sport England supports the role of Urban Open Land in protecting playing pitches and recreational land

#### Movement

- 4.67 The Hertfordshire Local Enterprise Partnership supports the three policies in this section of the plan but thinks it should go further to identify longer term strategic investment priorities consistent with the Local Transport vision.
- 4.68 A number of comments have been made throughout the Plan of the need to prioritise the provision of cycle and pedestrian routes.
- 4.69 A number of comments have been made querying whether sufficient account has been taken of congestion which will arise on the road network and the need for improvement in public transport.

#### Retail Hierarchy

- 4.70 Representations have been received which consider that the importance and role of Hatfield Town centre has been overstated and that the Galleria should be designated as Hatfield's town centre.

- 4.71 Two respondents consider the need for additional retail floorspace has been overstated.

#### Community Services and Facilities

- 4.72 Sport England is supportive of the approach to providing sports facilities and in particular the commitment that new schools should provide dual use facilities. They consider that strategic sites should be making provision for new facilities and welcome the approach set out in the Plan for the strategic sites.

#### Type of Housing

- 4.73 North Mymms Parish Council strongly support the approach to affordable housing.
- 4.74 The Home Builders Federation supports the approach to thresholds but questions whether or not the affordable housing targets are justified as the evidence indicates that flats in Welwyn Garden City and Hatfield will struggle to be viable and that the Council will struggle to deliver social rented affordable housing.
- 4.75 The University of Hertfordshire considers that private sector student accommodation should be required to be agreed with the university.

#### Economy

- 4.76 The Hertfordshire Local Enterprise Partnership supports the strategy for the economy set out in the Plan, however they consider it needs to say more about how it is proposed to promote higher order employment uses such as science parks, research and development, precision engineering, biosciences in preference to lower value activities such as distribution (which the LEP thinks it should) and a consideration of whether the level of proposed additional floorspace/jobs contained within the plan will match and even outstrip the anticipated additional levels of economically active residents arising from the housing growth element, so that employment density is maintained and ideally enhanced (once again, the LEP thinks it should).
- 4.77 Others consider the Plan does not go far enough and should include a policy committing to working with adjoining authorities along the A414 corridor on a joint economic and transport strategy to create a vibrant and sustainable economic cluster. Furthermore there should be a reference to the need to make provision of a range of good quality housing to support the borough's working population.
- 4.78 The 'blanket approach' to protecting all employment land has been criticised and further consideration should be given to allowing types of ancillary uses such as hotels. The employment area incorporating Entech House in Woolmer Green should be allocated for housing instead of employment. The employment area in Woolmer Green incorporating Lessiters and Cawdor Stone should be expanded to allow Cawdor Stone to expand.
- 4.79 The Greater London Authority state that Welwyn Hatfield sits within the London-Stansted-Cambridge-Peterborough corridor and consider that with this context it would be useful to explore further relevant economic linkages with north London and to consider emerging regional issues associated with land for industry and logistics.

- 4.80 London Luton Airport considers that there should be greater reference to the strategic importance of the airport to the economy of the area and that growth in the area should not prejudice its ongoing and future operations.

#### Quality of New Development

- 4.81 Not many representations have been received to this part of the Plan. Comments relate to the need to refer to Welwyn Garden City design principles of symmetry, balance and streetscape. That the Plan should set specific design principles and standards for the strategic sites.
- 4.82 Sport England propose an amendment to the policy to promote the use of design to promote active and healthy lifestyles.
- 4.83 The Environment Agency support the use of BREEAM assessments for non-residential development. Hertfordshire County Council consider there should be reference to Site Waste Management Plans in the Sustainable Design and Construction Policy.

#### Sites

- 4.84 The Hertfordshire Local Enterprise Partnership is generally supportive of the strategic sites including Marshmoor. They have made reference to the need to link south east Welwyn Garden City to strategic improvements to the A414 and to consider the potential for more dwellings on Symondshyde,
- 4.85 St Albans City and District Council consider that the benefits of allocating Symondshyde and the Coopers Green Lane Gypsy and Traveller site HS34 do not outweigh the harm to the Green Belt.
- 4.86 Hertfordshire County Council welcome the reference to prior extraction of minerals on the strategic sites but have asked for a minor modification to the wording of the relevant policies. They also consider that this requirement should be included for Symondshyde even though minerals have already been extracted from part of the site.
- 4.87 A number of respondents consider that there is no need to allocate Marshmoor. Goodmans consider that other alternatives such as Roehyde should have been considered. North Mymms Parish Council raise concerns about congestion in the vicinity of Marshmoor and the safety of the junction. Hertfordshire County Council consider that improvement would need to be made to the junction.
- 4.88 There are a number of respondents, including Historic England, who have objected to the development of the southern part of SDS2 (WGC5) South East Welwyn Garden City because of the impact this is considered to have on the setting of Hatfield House.
- 4.89 Cuffley Parish Council considers that Sites HS30 (Cuf7) and HS29 (Cuf12) should not have been allocated because of a lack of a defensible green belt boundary. As stated above they have also submitted a transport appraisal which identifies capacity issues. Hertfordshire County Council in their response consider that the level of growth can be accommodated with appropriate mitigation.

- 4.90 Promoters of sites in Welham Green have combined to put forward proposals for a new single form entry primary school to address the infrastructure issues. They have also submitted evidence on the need for additional school places in Welham Green challenging the County Council's position that 1,000 dwellings equates to the need to provide a two form entry primary school and two additional forms at secondary level. A promoter of sites in Brookmans Park has similarly submitted evidence on this matter.
- 4.91 There is opposition from Woolmer Green Parish Council and Knebworth Parish Council to scale of growth proposed for Woolmer Green and loss of land from the Green Belt. They would prefer to see Entech House currently proposed as an employment area to be changed to residential.
- 4.92 Employment sites now being promoted for residential or employment land boundary be extended.
- 4.93 North Mymms Parish Council consider the allocation in Welham Green for Gypsy and Traveller provision is disproportionate given the number of pitches that already exist in the village.

## **Implications**

### **5 Financial Implication(s)**

- 5.1 There are no specific financial implications arising from this report. The costs of the production of the technical work will be met from existing budgets.

### **6 Link to Corporate Priorities**

- 6.1 The preparation of the Local Plan is a corporate target of the Council, as Business Plan Priority 3 (Meeting the Borough's Housing Needs) sets out that the Council will publish a new Local Plan to ensure a robust and agreed blueprint for future housing and other growth needs in the borough.

### **7 Legal Implications**

- 7.1 It is a legal requirement that consultation associated with the preparation of a Local Plan is carried out in accordance with the Statement of Community Involvement (SCI) and the Local Development Scheme (LDS) as well as meeting the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 7.2 It is a legal requirement that a Sustainability Appraisal and a Habitats Regulations Assessment are carried out.
- 7.3 The Localism Act 2011 introduced the Duty to Cooperate, not only with other planning authorities but also with bodies such as Hertfordshire Local Enterprise Partnership, Hertfordshire Local Nature Partnership and the Environment Agency.

### **8 Risk Management Implications**

- 8.1 The requirement to have prepared a Local Plan by early 2017 makes it critical that progress is made on moving forward with the Local Plan to adoption at the earliest opportunity.

8.2 However there is a risk of the Local Plan being found unsound if it is not justified by the technical evidence, if it does not result in a deliverable strategy or if it does not meet the legal tests relating to its preparation which include the Duty To Cooperate.

8.3 The risk of delaying preparation of the Local Plan needs to be weighed against the risk of legal challenge or being found unsound at a later stage. Analysing the consultation responses to the Local Plan will allow the Council to assess what, if any, technical work needs to be updated and to consider if any changes to its proposals should be made before finalising the draft plan for submission.

## **9 Security and Terrorism Implications**

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

## **10 Procurement Implications**

10.1 There are no procurement implications associated with this report. If the Draft Local Plan is agreed for submission to the Secretary of State, the Council will need to appoint a Programme Officer to arrange the Examination in Public, support the appointed inspector and manage the document library.

## **11 Climate Change Implications**

11.1 No climate change implications have been identified resulting from this report. There will be climate change implications if the proposals in the Local Plan are adopted and implemented however policies in the Plan seek to mitigate and minimise these impacts.

## **12 Policy Implications**

12.1 Once adopted the Local Plan will be the main consideration for determining planning applications and set the framework for the preparation of Neighbourhood Plans and Supplementary Planning Documents. It will identify sites required to meet the need for growth, sites which should be protected and will also set out the approach for assessing planning applications.

## **13 Equality and Diversity**

13.1 As this report is simply for noting rather than developing a new policy or amending an existing policy approach, an Equalities Impact Assessment has not been carried out.

Sue Tiley

Planning Policy and Implementation Manager

30 January 2017

## **Background Documents**

Representations to the consultation on the Draft Local Plan Proposed Submission and supporting documents <http://consult.welhat.gov.uk/portal>