

Habitats Regulations Assessment - Addendum Note Further Proposed Modifications to the Local Plan, March 2021

1. The 2018 Habitats Regulations Assessment (HRA) (Examination Document ED164) considers whether the North Hertfordshire Local Plan 2011-2031 (Local Plan) is likely to have a significant adverse effect on a European Site, either alone or in combination of other plans and projects. The HRA assesses the Local Plan in light of the changes proposed in the Main Modifications issued in 2018.
2. This Addendum Note to the HRA has been published alongside the March 2021 Further Proposed Modifications. It considers whether any of the key factors leading to the HRA's conclusion have materially altered such that it would be necessary to revise or replace the HRA or any part of it.
3. In combination with the HRA, this Addendum represents an HRA of the Local Plan as now proposed to be modified, updating the findings presented in the HRA. This addendum should therefore be read alongside the HRA.
4. North Hertfordshire District Council is required by law to carry out a Habitats Regulations Assessment. HRA refers to the assessment of the potential effects of a development plan on one or more European sites. More detail is contained in the main HRA report.

Findings of the HRA

5. Having considered all of the policies and allocations in the Local Plan, the HRA concludes that a number of proposed allocations in the Local Plan cannot be 'screened out' and Appropriate Assessment is required in regard to the relationships between these sites, the catchment area of the Rye Meads Sewage Treatment Works (STW), the Lee Valley Special Protection Area (SPA) / Ramsar and the qualifying features of this European Site.
6. The allocations which cannot be screened out are those lying within the catchment area of the Rye Meads STW. These are identified on Page 21 of the HRA as:
 - Policy SP16 / Site NS1: Land north of Stevenage
 - Policy SP18 / Site GA2: Land north-east of Great Ashby
 - Policy CD1: Land south of Cowards Lane, Codicote
 - Policy CD2: Codicote Garden Centre
 - Policy CD3: Land at The Close, Codicote
 - Policy CD4: Pulmer Water, Codicote
 - Policy CD5: Land south of Heath Lane, Codicote
 - Policy CD6: Danesbury Park Road, nr Codicote
 - Policy GA1: Land at Roundwood, Great Ashby
 - Policy GR1: Land at Milksey Lane, Great Ashby
 - Policy KB1: Land at Deards End Lane, Knebworth
 - Policy KB2: Land at Gypsy Lane, Knebworth
 - Policy KB3: Chas Lowe Site, Knebworth
 - Policy KB4: Land east of Knebworth
7. These site policies are subject to Appropriate Assessment in the HRA. The Appropriate Assessment identifies that, if the Rye Meads STW can adequately treat the wastewater and discharge it to the water bodies within the Rye Meads water catchment area then the likely significant effect of the proposed development allocations are mitigated.

8. The HRA identifies that Policy NE10 of the Local Plan as modified allows for the refusal of planning applications where the Rye Meads STW would be unable to provide adequate wastewater treatment capacity to ensure that the designated species and habitats would not be at threat from wastewater sources related to the proposed development allocations.
9. With this mitigation in place, the HRA concludes that site allocations and likely significant effect on the Lee Valley SPA can be screened out.

Consideration of key factors leading to the HRA conclusions

10. To determine whether any further work is required, the key factors informing the HRA conclusion of no likely significant effect on a European Site and the potential implications of the Further Proposed Modifications have been reviewed. This review has had regard to the following:
 - Designated European Sites within or close to North Hertfordshire
 - The distance thresholds used to consider potential impacts
 - The notified features of the relevant European Sites
 - In combination effects with other Plans
 - The existence or otherwise of any new policies, sites or requirements within the Further Modifications that might require further consideration
 - The existence or otherwise of any Further Modifications which might impact upon the mitigation measures in Policy NE10 previously identified
11. Table 1 below provides a summary commentary against each of these factors. Appendix 1 provides an update on those authorities where the HRA considers there is potential for in combination effects. Appendix 2 considers the potential implications of each of the Further Modifications for the HRA.
12. It can be seen from Table 1 that the screening conclusions of the HRA in relation to the identification of relevant sites, features and impacts are still considered to be valid.
13. Some of the Local Plans identified in the HRA have now been adopted or have otherwise seen a change in their status. The latest position of these plans, and any associated HRA produced by the relevant authority, has been considered. It is concluded that there is no change to the findings of the HRA as a result of these.
14. The vast majority of the Further Proposed Modifications have no implications for the HRA as they do not result in any change to the location or quantum of development within the catchment of the Rye Meads STW when compared to the versions of the policies assessed in the HRA.
15. Sites KB3 and CD4, listed in Paragraph 6 of this addendum, are proposed for deletion from the Plan and would therefore no longer fall to be considered by the HRA. Site NS1 is now likely to be delivered slightly more slowly than previously anticipated with 775 homes in the Plan period. However, the whole allocation of 900 homes is retained in the Plan and there is therefore no change from a HRA perspective.
16. There are no Further Proposed Modifications to Policy NE10. The proposed modifications to Policy SP9 would reinforce operation of this policy on strategic and significant development sites (defined as those of more than 100 homes).

Table 1: Consideration of key factors leading to HRA conclusions

Factor considered	HRA Summary	Addendum commentary	Conclusion
Designated European Sites within or close to North Hertfordshire	Three European Sites are screened in to the assessment by virtue of lying within a 15km precautionary zone of influence around the District boundary	No new Special Areas of Conservation, Special Areas of Protection or RAMSAR sites have been designated within the precautionary zone of influence. No candidate sites – which would be afforded equal protection to designated sites in the HRA process – have been identified.	No change to overall HRA findings
The distance thresholds used to consider potential impacts	<p>The HRA identifies the following distance thresholds for potential significant effects:</p> <ul style="list-style-type: none"> • Wetland bird foraging - 2km • Bat foraging - 8km • Recreational Disturbance - 5km • Noise / vibration - 500m • Light - 300m 	The distance thresholds in the HRA are based upon recognised sources and are considered valid. Updated Planning Practice Guidance ¹ advises using the impact zones identified on the Government’s ‘MAGIC’ mapping tool ² . The impact zones shown on ‘MAGIC’ for the sites within the precautionary zone of influence cover a lesser distance than the thresholds used in the HRA; the impact zones of the three sites extend to a maximum radius of 2km for residential development. The HRA therefore takes a more precautionary approach.	No change to overall HRA findings
The notified features of the relevant European Sites	The HRA identifies the key features of the relevant sites based on published data and identified sources	The notified features of the relevant sites, as shown on the Joint Nature Conservation Committee website ³ , are dated January 2016 predating the HRA.	No change to overall HRA findings
In combination effects with other plans	The HRA identifies a number of plans in Hertfordshire, Cambridgeshire and Essex and concludes there are no in combination effects	Although the status of some plans has changed, no other authorities have identified likely significant effects in relation to the Lee Valley SPA and there remain no in combination effects. Further details are contained in Appendix 1.	No change to overall HRA findings

¹ <https://www.gov.uk/guidance/appropriate-assessment>, accessed March 2021, recognising that the Plan is being examined against the 2012 version of the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance as it stood at the time of NPPF’s replacement.

² <https://magic.defra.gov.uk/magicmap.aspx>, accessed March 2021

³ <https://sac.jncc.gov.uk/site/>; <https://jncc.gov.uk/our-work/list-of-spas/>, accessed March 2021

Factor considered	HRA Summary	Addendum commentary	Conclusion
The Further Proposed Modifications	Not applicable	The majority of the Further Proposed Modifications do not relate to sites or matters screened into the HRA. Some further modifications relate to sites screened into the HRA but do not impact upon the quantum of development proposed on those sites or the operation of Policy NE10. Two sites within the Rye Meads STW catchment are proposed for deletion and would therefore not fall to be considered by the HRA as they would no longer form part of the Plan. The proposed modifications to Policy SP9 reinforce the operation of Policy NE10 for strategic and significant development sites within the Rye Meads STW catchment. Further details are contained in Appendix 2.	No change to overall HRA findings
Policy NE10	The HRA identifies the requirements and supporting text of Policy NE10 as providing mitigation that is central to its conclusion of no significant effects	The Further Proposed Modifications do not propose any changes to Policy NE10. The proposed modifications to Policy SP9 reinforce the operation of Policy NE10 for strategic and significant development sites within the Rye Meads STW catchment.	No change to overall HRA findings

Conclusions

17. The conclusions of the HRA for the North Hertfordshire Local Plan remains that (taking into account the Further Proposed Modifications) it is not likely to have adverse effects on the integrity of European sites, either alone or in-combination with other plans or projects, providing that the mitigation set out in the Local Plan and assessed by the HRA is implemented.

Appendix 1 - consideration of in-combination effects

Authority	Change in Plan status since HRA	Change in Authority's HRA findings / documents	Conclusion for NHDC HRA
Broxbourne	Local Plan adopted June 2020	May 2020 post-adoption statement confirms no likely significant effects	No change to HRA findings
Cambridgeshire County Council	New Waste and Minerals Local Plan submitted for Examination March 2020	November 2019 HRA and January 2021 addendum conclude no likely significant effects	No change to HRA findings
East Hertfordshire District Council	Local Plan adopted October 2018	None	No change to HRA findings
Epping Forest District Council	New Local Plan at examination	Replacement HRA January 2019 concludes no likely significant effects	No change to HRA findings
Essex County Council	None	None	No change to HRA findings
Harlow District Council	Local Plan adopted December 2020	November 2020 HRA Adoption Statement confirms no likely significant effects	No change to HRA findings
Hertfordshire County Council	Proposed Submission Minerals Local Plan published January 2019 Draft Waste Local Plan (Reg.18) published January 2021	December 2018 HRA concludes no likely significant effects December 2020 HRA contains recommended amendments to draft policies to ensure no adverse effects in relation to air quality; this is in relation to sites that are not identified in the North Hertfordshire HRA or where likely effects arising from the North Hertfordshire Local Plan have been screened out	No change to HRA findings No change to HRA findings
Stevenage Borough Council	Local Plan adopted May 2019	None	No change to HRA findings
Welwyn Hatfield Borough Council	None	None	No change to HRA findings

Appendix 2: Screening of Further Modifications for HRA implications

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
FM 010	6	Paragraph 1.5 and Footnote 1	The National Planning Policy Framework (NPPF) ¹ was first published in 2012 and was revised in 2018. The NPPF sets out the Government’s planning policies for England and must be taken into account along with other national planning policy in the preparation of local and neighbourhood plans and in determining planning applications. The NPPF is supplemented by detailed Planning Practice Guidance (PPG), first released in 2014, which provides additional detail on certain topics. Local plans must be consistent with national planning policy to pass examination. This Local Plan has been prepared in accordance with the 2012 version of the NPPF. ¹ National Planning Policy Framework (DCLG) March 2012 – http://www.communities.gov.uk https://www.gov.uk/government/publications/national-planning-policy-framework--2	To ensure the plan is positively prepared, and consistent with national policy ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
MM 004 / FM 011	7	Paragraph 1.12	The first step in preparing a neighbourhood plan is to define a neighbourhood area. There are currently eleven thirteen neighbourhood planning areas designated within the District with one further community another two communities considering preparing a neighbourhood plan. Three neighbourhood plans have been “made” and form part of the Development Plan, Pirton, Wymondley and Preston. Those plans under preparation include the parishes of Kimpton, Ashwell, Codicote, Barkway and Nuthampstead, Ickleford, St Ippolyts, St. Pauls Walden, Wymondley, Preston and Knebworth, Wallington and the joint neighbourhood planning area of Bygrave, Baldock & Clothall.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 012	8	1.19 (Footnote 3)	North Hertfordshire Statement of Community Involvement updated xxx-2015 July 2020.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 013	9	1.20 (Footnote 4)	North Hertfordshire Local Development Scheme January-2016 April 2017	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 014	9	After 1.27 (New paragraph)	Further consultation was undertaken on the Inspector’s Proposed Main Modifications in 2019 and 2021.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 015	11	Paragraph 2.6 and Footnote 8	North Hertfordshire is a diverse area. The total population figure for North Hertfordshire, from the 2015 Mid-Year Estimates, was 131,696 (males = 64,621 and females = 67,075) 2019 Mid-Year Estimates, was 133,570 (males = 65,382 and females = 68,188) ⁸ . Over 70% of the population live in the four main settlements of Hitchin, Letchworth Garden City, Royston and Baldock. ⁸ ONS (2016 9) Mid 2015 2019 Population Estimates for UK, England and Wales, Scotland and Northern Ireland	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 016	12	Paragraph 2.7 / Footnote 9	The District age profile differs from the East of England profile as shows that there is a lower proportion of 15-29 year olds than in Hertfordshire (North Hertfordshire 15.7% 14.9% compared to East of England 17.8% 16.6% in the county). There are, however, more in the age groups from 30-54 (North Hertfordshire 36% compared to East of England 33.6%) However, the proportion of people in the District in the 30 – 54 age group mirrors the proportion in the county as a whole (North Hertfordshire 35.1% compared to 34.9% for Hertfordshire) ⁹ . ⁹ ONS (2016-2019) Population Estimates by single year of age	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 017	12	Paragraph 2.8 / Footnote 10	Official statistics indicate that the population is likely to increase over the next 15 10 years by just over 24,000 nearly 9,000 residents (population estimate at 2031 – 153,400-146,500) ¹⁰ . This is due to a combination of factors, including people living longer, changes in social patterns, and the attractiveness of the District as a place to live. This will put considerable pressure not just on our housing numbers but on vital social support mechanisms such as schools and GP surgeries as well as our transport infrastructure. ¹⁰ Stevenage and North Hertfordshire SHMA Update 2015 ONS 2016	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
FM 018	12	Paragraph 2.10 and Footnotes 11-13	<p>More than 8 in 10 (86.9%) (87.6%) of North Hertfordshire's 16-64 year olds are economically active (in or seeking employment) compared to a national figure of 79% 77.8%¹¹. The unemployment rate in North Hertfordshire is 3.4% 2.8%; this is below the East of England figure (3.8%) (3.6%) and below the national rate (4.2%) (5.1%)¹². Approximately 1 in 5 (13.1%) (12.4%) of North Hertfordshire's 16-64 year olds are economically inactive¹³.</p> <p>¹¹ Nomis (2016 2020) – Official Labour Market Statistics; Employment and unemployment (Apr 2015 – Mar 2016) (Oct 2019 – Sept 2020)</p> <p>¹² Nomis (2016) (2020) – Model based estimates of unemployment (July 2016) (Sept 2020)</p> <p>¹³ Nomis (2016) (2020) – Official Labour Market Statistics; Employment and unemployment (Apr 2015 – Mar 2016) (Oct 2019 – Sept 2020)</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 019	12	Paragraph 2.11 and footnote 14	<p>According to the 2015 2019 Index of Multiple Deprivation, North Hertfordshire is relatively affluent compared to other local authority areas. The District ranks 271st 269th out of 326 317 local authority areas in England (1 being the most deprived)¹⁴. None of the District's population lives in areas within the bottom 10% of Super Output Areas (SOA) nationally, i.e. in the most deprived parts of the country. North Hertfordshire does however have four five areas in the next two cohorts, i.e. those which are in the top 30% are seen as being most deprived, this includes one area in Hitchin and three four in Letchworth Garden City.</p> <p>¹⁴ Department for Communities and Local Government (2015) – English indices of deprivation 2015 Ministry of Housing, Communities and Local Government English indices of deprivation 2019</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 020	12-13	Paragraph 2.12 and footnote 15	<p>On the whole the quality of life in North Hertfordshire is good. Life expectancy in North Hertfordshire is similar to the national figure; the male rate is currently 80.4 81 years compared to 79.4 79.8 years for England, and the female equivalent is 83.2 84.3 years compared to 83.1 83.7 years nationally. Life expectancy is 3.7 4.7 years lower for men in the most deprived areas of North Hertfordshire than in the least deprived areas¹⁵.</p> <p>¹⁵ Public Health England (2015) (2019 - 2020) – North Hertfordshire Health Profile 2015</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 021	13	Paragraph 2.14 and footnote 16	<p>Adult and child obesity rates in North Hertfordshire are below the national and regional averages. Adult obesity rates in the District at 2020 were 58.2% of all adults compared with a national rate of 62.3% which still presents a key challenge for the District 19.1% v 23.0% for adults and 12.6% v 19.1% for children; however, these figures still present a key challenge for the District¹⁶.</p> <p>¹⁶ Public Health England (2015) (2019 - 2020) – Obesity Profile North Hertfordshire Health Profile 2015</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 022	13	Paragraph 2.15 and footnote 17	<p>Like most areas North Hertfordshire did not escape the detrimental affects of the economic downturn in 2009 and many variables including unemployment and job growth figures suffered as result. Figures have only recently returned to pre-2008 levels and the local employment environment is improving and the figures are moving in the right direction. It is estimated that there are around 48,800 54,000 jobs¹⁷ in North Hertfordshire.</p> <p>¹⁷ Nomis (2014) Nomis Local Authority Profile 2019</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 023	13	Paragraph 2.18	<p>The District has a working age population of 81,700 81,600 of which 71,800 76,700 are economically active. The majority of these are employees and work full-time but a small proportion of the population are self employed (10.4%) (10.5%).</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 024	13	Paragraph 2.19	<p>In 2015 the median gross pay for full-time workers in the area (residence based) was £637.3 per week. This was considerably higher than the median earnings of those living in the East of England region (£551.0 per week) and the National Average (£529.6 per week), reflecting the high earnings associated with the proportion of the public that commute out of the District.</p> <p>In 2020, the median gross pay for full time employees was £644.10 per week which compares favourably with the national average of £586.70.</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 025	13	Paragraph 2.20	<p>15.7% 16.65% of the population do not have access to a car. This is much lower than the national figure (24.9%) (25.8%) and slightly lower than regionally (17.7%) (16.93%).</p>	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
FM 026	14	Paragraph 2.22 and footnote 20	House prices in the District are well above the regional and national averages, although slightly below the average for Hertfordshire which is skewed significantly upwards by prices in areas such as St Albans. The average cost of a home in the District is around £350,000 £355,000 , meaning prices are around one-quarter 44% higher than the national average ²⁰ . ²⁰ Quarterly House Price Data for Hertfordshire (HertsLIS, 2016) ONS House Price Statistics for Small Areas 2019-2020	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 027	14	Paragraph 2.25 and footnote 22	There are currently more than 1,600 2,100 households on the local authority housing register awaiting assistance with their housing needs ²² ²² Stevenage and North Hertfordshire Strategic Housing Market Assessment Update: Volume Two (ORS, 2016) NHDC Summary Statistics 2020	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 028	16	2.39	The HMA geography has informed the preparation of Strategic Housing Market Assessments (SHMA) which have been were completed on a 'best fit' basis by groups of local authorities. The Council has prepared a joint SHMA ²⁶ with Stevenage which identifies , at the time of the plan's submission, identified an objectively assessed need (OAN) for 13,800 homes in North Hertfordshire and 7,600 homes within Stevenage over the period 2011-2031. Further Government household projections were released during the examination and a revised assessment for North Hertfordshire identified an OAN of 11,500 homes* . The plans of both authorities show that their individual housing needs can be accommodated in full within their administrative areas. * Review of the Official Projections for North Hertfordshire (ORS, 2020)	To ensure the plan is positively prepared, justified and consistent with national policy following the Matter 21 hearing as supported by document ED191A	None – factual update that does not result in any changes to the locations or quantum of development
FM 029	17	Paragraph 2.41	Luton's plan and associated evidence base identifies a requirement for approximately 18,000 homes in the Borough but has capacity for just 7,000 8,500 . The most recent projections for Luton did not lead to a meaningful change in the housing situation presented in Luton's adopted Plan. The issue of unmet needs from Luton is therefore a significant matter to be considered under the Duty to Co-operate.	As above	None – factual update that does not result in any changes to the locations or quantum of development
FM 030	19	Paragraph 2.45	A number of key plans and strategies are produced at a county level to which the Council should have regard to in preparing the Local Plan. Key amongst these is are the: <ul style="list-style-type: none"> • Strategic Economic Plan, 2017 - 2030 and Growth Deal of both the Hertfordshire Local Enterprise Partnership (LEP) and the Greater Cambridge, Greater Peterborough LEP. • Hertfordshire Local Nature Partnership • Hertfordshire Waste and Minerals Local Plans • Hertfordshire Local Transport Plan 	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 031	19	Paragraph 2.46	In October 2013 the Hertfordshire LEP published their Strategic Economic Plan for the county which was refreshed in July 2017 . This strategy sets out the LEPs vision, that by 2030, Hertfordshire will be the leading economy at the heart of the UKs Golden Triangle, which encompasses Cambridge, Oxford and London. To deliver the vision, the LEP has identified a number of priority areas, which represent major opportunities for Hertfordshire. These include: <ul style="list-style-type: none"> • Maintaining Hertfordshire's global excellence in science and technology; • Harnessing Hertfordshire's relationship with London (and elsewhere); • and Re-invigorating Hertfordshire's places for the 21st Century; and • Building the wider foundations for growth across both businesses and people. 	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 032	19	Paragraph 2.48 (delete)	Given that the northern part of the District is heavily influenced by the Cambridgeshire economy, the District is also part of Greater Cambridge, Greater Peterborough LEP. The goal of the Greater Cambridge, Greater Peterborough LEP is to create an economy with 100,000 major businesses and create 160,000 new jobs by 2025, in an internationally significant low carbon, knowledge based economy, balanced wherever possible with advanced manufacturing and services.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 033	19	Paragraph 2.49	The Hertfordshire LEPs are is responsible for bidding and prioritising infrastructure investment within their areas the county .	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
FM 034	20	Paragraph 2.56	The County Council is also the Highway Authority with responsibility for transport matters. This Plan supports key priorities and proposals from the Hertfordshire Local Transport Plan (LTP3) (LTP4) adopted in 2011-2018. LTP3 LTP4 sets out the transport strategy for Hertfordshire (over the period from 2011 2018 to 2031), the goals and challenges to be met, and outlines a programme of transport schemes and initiatives to be delivered subject to available funding. The LTP covers all modes of transport - including walking, cycling, public transport, car based travel and freight - and takes account of the effect of transport on wider aspects including the economy, environment, climate change and social inclusion.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 035	20	Paragraph 2.57	It will therefore be necessary to both have regard to this strategy and work with the Highway Authority when taking forward the development sites set out in the Local Plan. Work on the next iteration of the LTP – the 2050 Transport Vision – is well under way and is expected to be finalized by the end of 2016. This vision will set out proposals for accommodating growth in this Local Plan and other local plans in Hertfordshire.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 036	21	Paragraph 2.59	North Hertfordshire Corporate Council Plan The North Hertfordshire Corporate Plan 2017-2021 recently reviewed in 2016 Council Plan 2021 – 2026 sets out the Council’s vision and corporate objectives for the District. The council’s vision set out in the Corporate Council Plan is: <i>‘making North Hertfordshire a vibrant place to live, work and prosper’</i> “To make North Hertfordshire a district in which everyone who lives, works or visits is able to flourish.”	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 037	21	Paragraph 2.60	The Corporate Plan draws together the key elements of the Council’s proposals for how it will serve the District over the next few years. As well as looking at the current status of the authority, it considers the opportunities and risks facing the District, and also identifies the high-level projects which will ensure the Corporate Plan is being delivered. The Council plan sets out the priorities that the Council will address over the next five years. The plan also lays out how North Hertfordshire District Council will achieve its aims for the district.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
FM 038	21	Paragraph 2.61	The Corporate Plan sets the following three objectives: 1. To work with our partners to provide an attractive and safe environment for our residents, where diversity is welcomed and the disadvantaged are supported 2. To promote sustainable growth within our District to ensure economic and social opportunities exist for our communities, whilst remaining mindful of our cultural and physical heritage 3. To ensure that the Council delivers cost effective and necessary services to our residents that are responsive to developing need and financial constraints The Council Plan sets out the following objectives: <ul style="list-style-type: none"> • Be a welcoming, inclusive, and efficient council; • Build thriving and resilient communities; • Respond to challenges to the environment; • Enable an enterprising and co-operative economy; • Support the delivery of good quality and affordable homes. 	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
MM 010 / FM 039	32	Policy SP2	Policy SP2: Settlement Hierarchy and Spatial Distribution^x Between 2011 and 2031, the plan makes provision for at least 13,000 new homes. Approximately 80% The majority of the District’s housing development and the substantial majority of new employment, retail and other development will be located within the adjusted settlement boundaries of or adjoining the following towns: <ul style="list-style-type: none"> • Baldock (2,198 homes) • Hitchin (1,842) • Letchworth Garden City (1,928) • Royston (1,899) • Stevenage (including Great Ashby)³² (1,705); and • Luton³² (1,485) Approximately 13% of housing, along with supporting infrastructure and facilities will be delivered within the adjusted settlement boundaries of the following five villages for the levels of development indicated:	To ensure the plan is positively prepared, justified, effective and consistent with national policy following the Matter 21 to 26 hearings as supported by the statements to those sessions and documents including ED161, ED172, ED191A and ED191B Note: Indicated figures for the five villages are for development within	None – This policy sets out the overall quantum and distribution of development. However, the modified requirement is lower than considered in the HRA whilst the amended settlement level numbers reflect changes in completions and permissions and the phasing of development beyond 2031 rather than

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<ul style="list-style-type: none"> • Barkway (208) • Codicote (363) • Ickleford (235) • Knebworth (731) • Little Wymondley (312) <p>The remaining development will be dispersed across the District as set out below...</p> <p><i>[Remainder of proposed Policy SP2 incorporating MM010 unchanged]</i></p>	the adjusted settlement boundary and will not be the same as the figures presented in Chapter 13 which are for the whole parish	any new allocations (of which there are none). Any site-specific implications considered against relevant policies below.
MM 011 / FM 040	33	After paragraph 4.11 (new paragraphs)	<p>Based on the policies and allocations of this plan, it is anticipated that approximately four in every five new homes delivered over the plan period will be built within the adjusted settlement boundaries of the towns...</p> <p><i>[remainder of proposed MM011 unchanged]</i></p>	For effectiveness consequent to FM039 [Policy SP2] and FM057 [Policy SP8]	None – factual update
MM 012 / FM 041	33	After paragraph 4.12 (new paragraph)	<p>Five villages have been identified that will support higher levels of new housing allocations than the Category A villages:</p> <ul style="list-style-type: none"> • Knebworth and Codicote are the two largest villages within North Hertfordshire and support a range of services, including a station at Knebworth; • Ickleford and Little Wymondley provide opportunities to accommodate further residential development in close proximity to neighbouring towns along with sustainable transport connections; and • Barkway as a focus for development in the rural east of the District 	For effectiveness following the Matter 26 hearing sessions and consequential to changes to Policy SP2	None – descriptive update of these villages
MM 014 / FM 042	35	SP3	<p>Policy SP3: Employment</p> <p>The Council will proactively encourage sustainable economic growth, support new and existing businesses and seek to build on the District's strengths, location and offer. We will</p> <ol style="list-style-type: none"> Allocate Bring forward an adequate supply and range of employment land in Hitchin, Letchworth Garden City, Baldock and Royston to meet the needs of the Functional Economic Market Area requirements of the local economy over the plan period to 2031. The allocations as shown on the Policies Map are : <ol style="list-style-type: none"> east of Baldock BA10 (19.6ha); and west of Royston RY9 (10.9ha); Designate existing Safeguard the Employment Areas within the District's main settlements, as shown on the Policies Map, to enhance and protect their safeguard employment potential for office, research and development, industrial or storage and distribution uses; Support additional employment provision through the new designations allocations shown on the on the Policies Map designations at : <ol style="list-style-type: none"> the former Power Station, Letchworth Garden City (1.5ha); east of Baldock (19.6ha); and west of Royston RY9 (10.9ha); Work with landowners, developers and, for allocated sites on the edge of the District, adjoining authorities to identify an appropriate amount of employment land to be included through the masterplanning process in strategic housing sites major new developments; Permit an appropriate range of offices, research and development, light industrial or B class employment uses within these areas; Promote and support the expansion of the knowledge based economy in the District. Proposals for the redevelopment of existing employment sites and the development of new allocated employment sites which increase the level of knowledge-intensive employment will be supported in principle. Support offices, research and development, light industrial and B-class uses in appropriate locations outside of designated employment areas, including offices in main town centres and concentrations of B-class these employment uses in certain Category A villages; and Ensure relevant policies of this Plan recognise the contribution of sectors other than B Class uses and offices, research and development and light industrial uses, including tourism, to the provision of 	For legal compliance (criteria b; e; g and h) in response to the Use Class Order amendments and effectiveness (criterion d) following the Matter 29 hearing as supported by the statement to that session and documents including ED176, ED203 and ED214	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			jobs. non B class sectors, including tourism, to the provision of jobs in the District.		
FM 043	35	4.19 (delete paragraph)	In planning, employment land usually refers to 'B class' uses and includes: <ul style="list-style-type: none"> • B1(a) – offices • B1(b) – research and development • B1(c) – light industry • B2 – general industry; and • B8 – storage and distribution 	For legal compliance in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 044	36	4.26	Trend-based forecasts reflect these patterns and anticipate continued increases in out-commuting from North Hertfordshire over the plan period ¹ . Unchecked, this would lead to increased pressure on transport infrastructure that is already under strain at peak periods. This Plan therefore makes employment provision for offices, research and development, light industrial, general industry and storage and distribution at above modelled levels.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 015 / FM 045	37	4.28	A significant new employment allocation for certain E class uses (office, research and development, industrial processes), B2 (industrial) and B8 (storage and distribution) class uses site will be developed out at the east of Baldock, supporting the proposed increase in residential development in the town (see Policy SP8). The allocation benefits from proximity to existing employment uses as well as existing and planned residential development. It has access to the strategic road network via the A505 Baldock Bypass.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 046	37	4.33	Within these designated areas, an appropriate range of offices, research and development, light industrial, general industry and storage and distribution B-class uses will be permitted in line with the detailed policies of this Plan.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 047	37	4.34	B class uses will not be solely confined to designated employment areas. A number of employment premises are located outside of defined areas and these will continue to be supported where they are compatible with other surrounding uses. In particular, office uses will continue to be supported in the main town centres (see Policy SP4), in line with national planning policy.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 048	37	4.35	Beyond our main towns, there is a steady demand for rural employment land and premises. Owing to the size and extensive spread of rural settlements these types of development are best dealt with on a case-by-case basis rather than through allocations, although our general approach will be to direct concentrations of rural business to the Category A larger villages. There are quite sizeable employment sites in villages such as Ashwell, Codicote, Kimpton, Little Wymondley and Weston which provide rural jobs and should be retained.	For effectiveness consequential to modifications to Policy SP2	None – descriptive update of villages to which this guidance applies
FM 049	38	4.36	Approximately 45% of all jobs fall within the office, research and development, light industrial sectors or into the B uses classes. The rest of the jobs in the local economy consist of services such as retail, health, education and leisure, or 'footloose' careers in sectors such as construction and the trades. The role of these non-B-class sectors in the overall employment balance of the District is recognised and will continue to be supported where appropriate .	For legal compliance in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 017 / FM 050	38	Policy SP4	Policy SP4: Town Centres, and Local Centres and Community Shops The Council will make provision for an appropriate range of retail and service facilities across the District and are committed to protecting the vitality and viability of all centres. We will: <ul style="list-style-type: none"> a. Promote, protect and enhance the provision of shops, financial and professional services, café or restaurants, pubs or drinking establishments or takeaways in retail and service functions of the following centres in our retail hierarchy: <ul style="list-style-type: none"> i. The town centres of Hitchin, Letchworth Garden City, Baldock and Royston; 	For legal compliance and effectiveness in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214 and in response to the	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings																																																																																
			<p>ii. 13 existing local centres consisting of:</p> <ul style="list-style-type: none"> • village centres at Ashwell, Codicote and Knebworth; • seven centres in Hitchin • two centres in Letchworth Garden City; and • the centre at Great Ashby; and <p>iii. 2 new local centres north of Baldock and East of Luton within the strategic housing sites identified in this Plan;</p> <p>b. Support proposals for main town centre uses in these locations where they are appropriate to the size, scale, function, catchment area, historic and architectural character of the centre;</p> <p>c. Identify Primary Shopping Frontages within town centres where A1-retail-uses shops* will be expected to concentrate</p> <p>d. To ensure the District's towns maintain their role and market share, make provision for up to 38,100 gross sq.m of additional A-class floorspace over the plan period comprising shops, café or restaurants, pubs or drinking establishments or takeaways, including the re-occupation of vacant floorspace, consisting of:</p> <ul style="list-style-type: none"> i. 22,500 gross sq.m comparison goods (e.g. clothes, shoes, furniture, carpets); ii. 8,600 gross sq.m convenience (e.g. food, drink, toiletries); and iii. 7,000 gross sq.m food and beverage outlets (e.g. restaurants, takeaways and bars). <p>38,100 gross sq.m is a district wide retail capacity but it is principally derived from the retail capacity projections for the four town centres, as indicated below:</p> <table border="1"> <thead> <tr> <th>Years</th> <th>2016-2021</th> <th>2021-2026</th> <th>2026-2031</th> <th>Totals</th> </tr> </thead> <tbody> <tr> <td>Baldock</td> <td>300</td> <td>1,600</td> <td>1,400</td> <td>3,300</td> </tr> <tr> <td>Hitchin</td> <td>3,800</td> <td>3,600</td> <td>3,700</td> <td>11,100</td> </tr> <tr> <td>Letchworth</td> <td>2,400</td> <td>3,300</td> <td>3,500</td> <td>9,200</td> </tr> <tr> <td>Royston</td> <td>3,200</td> <td>2,000</td> <td>1,900</td> <td>7,100</td> </tr> <tr> <td>Strategic Housing Sites</td> <td>1,500</td> <td>2,700</td> <td>2,600</td> <td>6,800</td> </tr> <tr> <td>Other</td> <td>200</td> <td>200</td> <td>200</td> <td>600</td> </tr> <tr> <td>Total</td> <td>11,400</td> <td>13,400</td> <td>13,300</td> <td>38,100</td> </tr> </tbody> </table> <p>The three town centres of Baldock, Hitchin and Letchworth Garden City have significant overlapping markets, with spend leakage from Letchworth Garden City to Hitchin and a lack of physical space at Baldock to accommodate its projected retail capacity. To address the leakage and physical capacity across these three centres the indicative distribution and phasing of provision is as follows:</p> <table border="1"> <thead> <tr> <th>Years</th> <th>2016-2021*</th> <th>2021-2026</th> <th>2026-2031</th> <th>Totals</th> </tr> </thead> <tbody> <tr> <td>Baldock</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Hitchin</td> <td>0</td> <td>3,700</td> <td>3,300</td> <td>7,000</td> </tr> <tr> <td>Letchworth</td> <td>5,350</td> <td>5,500</td> <td>5,000</td> <td>15,850</td> </tr> <tr> <td>Royston</td> <td>4,350</td> <td>2,200</td> <td>1,800</td> <td>8,350</td> </tr> <tr> <td>Strategic Housing Sites</td> <td>0</td> <td>3,400</td> <td>2,900</td> <td>6,300</td> </tr> <tr> <td>Other</td> <td>0</td> <td>300</td> <td>300</td> <td>600</td> </tr> <tr> <td>Total</td> <td>9,700</td> <td>15,100</td> <td>13,300</td> <td>38,100</td> </tr> </tbody> </table> <p>*2016 to 2021 projections includes take-up of vacant units and the implementation of commitments.</p> <p>e. Prepare and maintain up-to-date town centre strategies to support this approach and / or adapt to change. These will be used to inform the approach to retail at the time of the early review; and</p>	Years	2016-2021	2021-2026	2026-2031	Totals	Baldock	300	1,600	1,400	3,300	Hitchin	3,800	3,600	3,700	11,100	Letchworth	2,400	3,300	3,500	9,200	Royston	3,200	2,000	1,900	7,100	Strategic Housing Sites	1,500	2,700	2,600	6,800	Other	200	200	200	600	Total	11,400	13,400	13,300	38,100	Years	2016-2021*	2021-2026	2026-2031	Totals	Baldock	0	0	0	0	Hitchin	0	3,700	3,300	7,000	Letchworth	5,350	5,500	5,000	15,850	Royston	4,350	2,200	1,800	8,350	Strategic Housing Sites	0	3,400	2,900	6,300	Other	0	300	300	600	Total	9,700	15,100	13,300	38,100	Inspector's August letter (Paragraphs 10 and 11)	
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			<p>f. Support the retention and provision of shops outside of identified centres where they serve a local day-to-day need.</p> <p>* Please refer to the Glossary for a definition of comparison and convenience goods [new footnote]</p>		
FM 051	38	After SP4 (new paragraph)	In relation to policy SP4, retail and service facilities refers to shops, cafés and restaurants (E-class use) along with pubs and drinking establishments and takeaways (sui generis). These were previously Class A uses.	For effectiveness in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 019 / FM 052	39	Paragraph 4.40	We are committed to promoting the well-being of the town centres in the District. Town centre strategies have been produced for the main centres of Hitchin, Baldock, Letchworth Garden City, and Royston. These promote the vitality and viability of the centres and cover all those aspects of policy guidance with a spatial dimension relevant to town centres, including economic, environmental and social well-being and matters such as community safety, community facilities, traffic management, marketing and delivery. The strategies provide a method of keeping town centre development up-to-date and flexible to take account of ongoing changes in the retail environment, and will inform whether it is necessary to review the retail strategy set out in this Plan. Work on these town centre strategies will commence within 12 months of the adoption of this Plan. They will be monitored and reviewed during the life of this Plan.	For effectiveness in response to the Inspector's August 2019 letter (Paragraph 10)	None – descriptive update setting out approach to town centre strategies. Any implications to be reflected in proposed review which will be subject to relevant assessments at the time of production
FM 053	39	Paragraph 4.41	Our detailed policies set out our approach to development applications, including for changes of use. In general terms, A1-retail shops will be expected to concentrate within the defined primary frontages with a wider variety of A-class-related retail and service uses, that are pubs or drinking establishments permissible in secondary frontage areas.	For legal compliance and effectiveness in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 020 / FM 054	39	Paragraph 4.44	The growth of the District will require additional centres to be provided to serve the largest new developments strategic housing sites. The centres for the two largest sites at Baldock and on the edge of Luton are expected to contain a wider range of retail facilities. Once built, these will become local centres in our retail hierarchy and future proposals within them will be assessed appropriately.	The Council considers this further change to be non-material but is included here as it amends a previous MM in response to Inspector's August 2019 letter (Paragraph 11)	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 021 / FM 055	39-40	Paragraph 4.46	Our evidence shows there will be a steady growth in retail demand over the plan period, although projected growth post-2026 carries a degree of uncertainty due to changing shopping and retail patterns and the effects of Covid- 19. Projected growth is driven in part by planned population growth but also by underlying changes in the way people shop and how much money they have available to spend. It is anticipated that on-line shopping will continue to grow whilst a certain amount of future demand can be accommodated through the re-occupation of existing, vacant shop units. However, it is also necessary to identify new sites for retail ² . Projected retail needs, and particularly those in the post-2026 period, will be kept under review via the monitoring framework and updated retail studies.	For effectiveness following the Matter 29 hearing	None – factual update to include reference to Covid-19.
FM 056	43	Paragraph 4.66	The overarching transport policy document for the area is the Hertfordshire Local Transport Plan (LTP3) (LTP4) which provides the framework for achieving better transport systems in Hertfordshire for the plan period 2011-2031. The LTP4 is in progress which will cover the Hertfordshire 2020 Transport vision and will be consulted on in late 2016. LTP4 was adopted in 2018. The Local Transport Plan covers all modes of transport including walking, cycling, public transport, car based travel, reducing road freight movements and making provision for those with mobility impairments.	To ensure the plan is positively prepared ; factual update	None – factual update that does not result in any changes to the locations or quantum of development
MM 035 / FM 057	47-48	Policy SP8	<p>Policy SP8: Housing</p> <p>Over the period 2011-2031, housing growth will be supported across the District. We will:</p> <p>a. Release sufficient land to deliver at least 14,000 11,600 net new homes for North Hertfordshire's own needs. Of these:</p>	To ensure the plan is positively prepared, justified, effective and consistent with national policy following the Matter 21 to 26	This policy sets out the overall quantum and distribution of housing development. However,

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<p>i. Around 13,800 11,500 net new homes will be provided within that part of the District falling within the Stevenage Housing Market Area (HMA); while</p> <p>ii. Around 200 100 net new homes will be provided within that part of the District falling within the Luton HMA;</p> <p>b. Provide additional land within the Luton HMA for a further 1,950 net new homes as a contribution towards the unmet needs for housing arising from Luton with approximately 1,400 of these being delivered over the Plan period to 2031;</p> <p>c. Deliver these homes through the sites and allowances identified in this Plan that will support approximately⁴⁸:</p> <p>i. 4,340 5,100 homes from completions and permissions achieved since 2011 and other allowances;</p> <p>ii. 7,700 homes from six Strategic Housing Sites delivering approximately 5,560 of these by 2031:</p> <ul style="list-style-type: none"> • BA1 - North of Baldock for 2,800 homes (2,500 approximately 1,400 to be delivered by 2031); • LG1 - North of Letchworth for 900 homes (approximately 600 by 2031); • NS1 - North of Stevenage in Graveley parish for 900 homes (approximately 775 by 2031); • HT1 - East of Hitchin for 700 homes; • GA2 - North-east of Great Ashby in Weston parish for 600 homes; and • EL1 / EL2 / EL3 - East of Luton for 2,100 homes (approximately 1,500 by 2031); <p>iii. 4,860 4,000 homes through local housing allocations that will provide homes on:</p> <ul style="list-style-type: none"> • newly identified sites and land within pre-existing settlement limits; • sites released from the Green Belt as part of a comprehensive, District-wide review; and • land identified following a review of other relevant boundaries or designations. • Further sites within the adjusted settlement boundaries of the towns; • Land within the adjusted settlement boundaries of five villages where more than 200 homes are expected to be built over the Plan period; and • Sites identified within the defined settlement boundaries of the Category A villages. This includes the use of land within pre-existing settlement limits, non-strategic sites released from the Green Belt and other land identified following a review of other relevant boundaries or designations. <p>iv. 7 4 new, permanent Gypsy and Traveller pitches</p> <p>d. Maintain a five-year housing land supply and target the completion of 20% of new homes over the plan period on previously developed land;</p> <p>e. Seek to provide long-term certainty by</p> <p>i. Identifying Strategic Housing Sites that will continue delivery beyond the end of the Plan period in 2031;</p> <p>ii. Working with the Government and other relevant agencies to identify new settlement options within North Hertfordshire that can provide additional housing supply in the period after 2026; and</p> <p>iii. Safeguarding land to the west of the A1(M) at Stevenage, as shown on the Proposals Policies Map, for up to 3,100 dwellings to meet longer-term development needs in the period beyond 2026 subject to a future review of this Plan; and</p> <p>iv. Undertaking a review of this Plan by the end of 2023.</p> <p>f. Support a range of housing tenures, types and sizes measured against targets to provide:</p> <p>i. 33% of all homes over the plan period as Affordable Housing for local needs with targets to deliver up to 40% Affordable Housing where viable;</p> <p>ii. A broadly even split between smaller (1- and 2-bed) and larger (3+ bed) properties subject to up-to-date-assessments of housing needs; and</p>	<p>hearings as supported by the statements to those sessions and documents including ED161, ED172, ED191A ED191B, ED215 and ED228 [G&T note]</p>	<p>the modified requirement is lower than assessed in the HRA whilst the amended figures against individual criteria reflect changes in completions and permissions and the phasing of development beyond 2031 rather than any new allocations (of which there are none). Any site-specific implications considered against relevant policies below.</p>

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<p>iii. 100-56 plots on specified Strategic Housing Sites to help pro-actively address demand for self-build development over the plan period; and</p> <p>g. Provide up to at least 350 bed spaces in suitable, supported accommodation to meet the needs of those who cannot live in their own home.</p>		
FM 058	48	Paragraph 4.86	<p>Our evidence identifies a requirement for 13,800 11,500 homes to be built between 2011 and 2031 to meet the needs of North Hertfordshire⁴⁹. A modest uplift has been added. This predominantly reflects the fact that, as people live for longer and live in their own homes for longer, it may be more appropriate to assume that more of their needs will be met in the normal housing stock⁵⁰.</p> <p>⁴⁹ Updating the Overall Housing Need (ORS, 2016) Review of the Official Projections for North Hertfordshire (ORS, 2020)</p> <p>⁵⁰ Housing requirements are normally calculated on the basis that the proportion of older persons needing specialised accommodation will not change over time.</p>	To ensure the plan is positively prepared, justified and consistent with national policy following the Matter 21 hearing as supported by document ED191A	None – factual update
MM 037 / FM 059	48	Paragraph 4.89	<p>More than 4,300 Approximately 5,100 of the required homes are accounted for by completions since 2011, sites which have already obtained planning permission and commenced development and other allowances. This includes two large developments on the edge of Royston with permission for almost 600 homes. These allowances The majority of these homes will be on previously developed land and also include:</p> <ul style="list-style-type: none"> • windfalls (those sites which will continue to come forward for development outside of the local plan process) as well as; and • Letchworth Town Centre as a broad location. locations. These are areas This is an area where it is reasonable to assume development might occur in the latter years of the plan, but where we cannot currently identify the exact location. The boundary of the broad location is the same as the Town Centre boundary for Letchworth shown on the policies map. The majority of these 4,300 homes will be on previously developed land. 	To ensure the effectiveness of the plan	None – factual update
MM 038 / FM 060	49	Paragraph 4.95	<p>The remainder of new homes will be delivered through a range of local housing allocations set out in the detailed policies of this Plan:</p> <ul style="list-style-type: none"> • More than 850 further homes are identified within pre-existing settlement boundaries and have influenced our target to build 20% of new homes on previously developed land; • As part of our comprehensive review of the Green Belt, a number of additional villages have been ‘inset’ with boundaries drawn to release additional land for development. These locations will contribute around 2,600 homes to our target whilst also ensuring the long-term sustainability of these settlements. • A series of developments around the edge of Royston will contribute almost 1,000 further homes; while • Sites for over 2,200 homes, in addition to the strategic sites, are identified within the adjusted settlement boundaries of the towns; • Sites for nearly 1,600 homes are identified at five village locations identified by Policy SP2; while • A review of the settlement boundaries in the Rural Areas Beyond the Green Belt of Category A villages allows for approximately 400 180 homes. 	To ensure the plan is positively prepared, justified, effective and consistent with national policy following the Matter 22 to 26 hearings as supported by the statements to those sessions and documents including ED161, ED172, ED191A and ED191B	None – factual update
MM 039 / FM 061	49	Paragraph 4.96	<p>This Plan also makes provision to meet the future needs of the Gypsy and Traveller community. Existing arrangements at the Pulmer Water site near Codicote will be formalised. A new site is allocated at Woodside Place, Danesbury Park Road at the southern edge of the District allowing requirements over the period to 2031 to be met.</p>	To ensure Plan is positively prepared and justified consequential to FM057	None – reflects removal of small proposed Gypsy and Traveller allocation which was previously screened in to HRA assessment
FM 062	49	Paragraph 4.98	<p>This needs to be balanced against realistic expectations about when we can expect to see new homes being built. This is especially the case on the largest new sites which require the certainty provided by this Plan in order to proceed and can require significant up-front investment in infrastructure such as new roads. As a result, most of the planned new homes are likely to will be delivered after 2021.</p>	For effectiveness in line with the approach suggested by ED178 (as subsequently superseded by Matter 22 / ED191B)	None – factual update
FM 063	49	After Paragraph 4.98 (new)	<p>The spatial strategy proposed by this Plan requires the simultaneous delivery of a number of strategic sites around the main towns. There will be challenges in this approach. These include the capacity of the development industry to deliver and the ability of the market to absorb these new homes. We will support</p>	As above	None – sets out approach to monitoring of housing delivery and review. Any

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		paragraph)	higher delivery rates where possible. This might include using innovative approaches to construction. We will develop a greater understanding of the rates of housing delivery that can be achieved as schemes are progressed and reflect these in the review of the plan as set out in Policy IMR2.		site specific implications considered under relevant policies.
MM 040 / FM 064	50	Paragraph 4.99	A stepped approach is considered most appropriate to deal with these issues. An average of 313 homes per year were built over the first nine years of the plan period between 2011 and 2020. Moving forward, housing supply will be measured against targets to deliver an average of 500 homes per year over the first ten years of the plan period (2011–2021) period to 31 March 2024. For the period beyond 2024, From 1 April 2024 a target of 1,100 1,120 homes per year will apply. Our approach to five-year land supply is set out in Policy IMR1 in Chapter 14.	To ensure the plan is positively prepared, justified, effective and consistent with national policy following the Matter 22 to 26 hearings as supported by the statements to those sessions and documents including ED191B and ED215	None – sets out approach to monitoring of housing delivery and review. Any site specific implications considered under relevant policies.
MM 043 / FM 065	50	Paragraph 4.105	In taking this approach, it is recognised that a review of this Local Plan will need to conclude before the end of the plan period in 2031 we are required to undertake a review of the Plan every five years to see if it needs to be updated. This Plan commits to undertaking a full review by the end of 2023, well within the five-year period. It is reasonable to assume that some development will be realised from whichever sites are identified through this process in the period after 2026. An allowance of 500 homes has been included in our housing figures.	To ensure the Plan is positively prepared and effective in line with the approach suggested by ED178 (as subsequently superceded by Matter 22 / ED191B)	None – sets out approach review of the Plan which will be subject to relevant environmental assessments at the time of its production
FM 066	50	Paragraph 4.106	Policy IMR2 in the Monitoring and Delivery Chapter of this Plan sets out in greater detail how we expect the local plan review process to occur.	For effectiveness consequential to modifications to Policy SP8 and Paragraph 4.105	None
MM 045 / FM 001	52	Policy SP9	<p>Policy SP9: Design and sustainability</p> <p>The Council considers good design to be a key aspect of sustainable development. We will</p> <ol style="list-style-type: none"> a. Support new development where it is well designed and located and responds positively to its local context; x. Require Strategic Masterplans to be produced for Strategic Housing Sites and other significant development by the landowner/applicant in collaboration with the Council and subject to consultation with key stakeholders and the community. Significant development generally comprises residential developments above 100 dwellings. Exceptionally, developments under 100 dwellings will be considered significant if there are site specific complexities and sensitivities that require a masterplan-led approach. In some circumstances a Strategic Masterplan may also be required to consider the cumulative impact of more than one site to support a co-ordinated and integrated approach to place-making and design. b. Require Strategic Masterplans and planning applications for Strategic Housing Sites and significant developments to (as applicable): <ol style="list-style-type: none"> i. Create buildings, spaces and streets which positively reflect and respond to the local landscape, townscape and historic character; ii. Create integrated, accessible and sustainable transport systems with walking, cycling and public transport designed to be the most attractive forms of transport and effectively linking into the surrounding areas; iii. Provide a clear structure and hierarchy of pedestrian friendly streets and well-connected footpaths and cycle ways integrated with the wider built and natural environment and communities; iv. Plan for integrated and mixed-use communities with walkable locally accessible community, employment and retail facilities; v. Positively integrate with adjacent rural and urban communities and positively contribute to their character and the way the area functions, including addressing cumulative, cross boundary planning and infrastructure matters; vi. Provide a diverse and distinctive range of flexible and adaptable house types, tenures and building forms to meet the differing needs of the population; vii. Create an accessible multi-functional green infrastructure network that provides: 	For consistency with national policy and for effectiveness following Matter 32 hearing session	This amended policy provides a range of additional policy criteria to guide development of the largest sites. References to sustainable water management provides a further 'hook' to engage the use of Policy NE10 reinforcing the earlier HRA findings.

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<ul style="list-style-type: none"> ▪ a key structuring and functional placemaking feature supporting healthy lifestyles, sport, play and recreation, linking into the wider Green Infrastructure Network; and ▪ a high quality, integrated network to support ecological connectivity, biodiversity net gain, climate adaptation and mitigation linking into the wider Ecological Network; <p>viii. Ensure the effective use of sustainable urban drainage and sustainable water management;</p> <p>ix. Ensure a hierarchy of linked, high quality and attractive public spaces and public realm that is safe, attractive and supports social interaction for all age groups; and</p> <p>x. Design to last with a clear stewardship, management and maintenance strategy;</p> <p>x. Ensure Strategic Masterplans are informed by a technical and design evidence base and include the following for Strategic Housing Sites and where applicable for other significant development:</p> <ul style="list-style-type: none"> i. Site specific vision and placemaking principles ii. Masterplan setting out the quantum, scale, type, mix and distribution of land uses, housing and community facilities iii. Green Infrastructure Framework identifying the scale, distribution, type and design of green spaces, biodiversity net gain, strategic drainage, on and off-site linkages iv. Movement Framework setting out the key access points, strategic highways, street hierarchy and footways and cycleways (on and off site) v. Urban Design Framework and design principles identifying how the site responds to local character and context and key structuring elements and layout principles (including heights and densities) vi. Sustainability & Energy Framework identifying site wide and building scale opportunities for low and zero carbon vii. Illustrative Masterplan Layout viii. Infrastructure Delivery, Phasing & Management Strategy <p>x. Confirm the scope and contents of individual Strategic Masterplans with applicants in pre-application discussions. To ensure sites are comprehensively planned and delivered planning applications should be preceded by and consistent with a Strategic Masterplan agreed by the Council. Where applications have already been submitted to the Council a Strategic Masterplan should be agreed with the Council prior to or as part of the grant of planning permission. Adherence to the Strategic Masterplan will be secured through planning conditions and/or legal agreement.</p> <p>c. Assess proposals against detailed policy requirements set out in this Plan and have regard to the Design SPD; and</p> <p>d. Adopt the Government’s additional technical standards for the size of new homes, water efficiency and, in specified circumstances, accessibility.</p>		
FM 002	52	Paragraph 4.116 (and new paragraphs thereafter)	<p>The largest sites will be masterplanned in accordance with any requirements set out in Policies SP14-SP19 and the Communities section of this Plan to maximise their benefits. Policy SP9 sets out the strategic design and masterplanning expectations of the Council for the Strategic Housing Sites and other significant development. The policy has to apply to a wide range of developments in terms of quantum, scale and complexity. The policy should be applied in its entirety to Strategic Housing Sites but for other significant development a tailored and case-by-case approach will be required to identify a proportionate level of masterplan and design detail to secure design quality dependant on site specific issues and the level of detail submitted with any planning application.</p> <p>4.xxx Strategic Masterplans are an effective tool in securing comprehensive and timely delivery and securing design quality and positive place outcomes. Masterplans support comprehensive, integrated, well- planned and sustainable places in terms of the natural, built and historic environment. An effective masterplanning process helps to support a multi-disciplinary, integrated, inclusive and collaborative approach to securing quality design and delivery. It also assists with resolving and co-ordinating planning issues at an early stage in the process</p>	As above	None – general principles relating to the implementation of Policy SP9

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<p>speeding up decision-making and driving forward delivery through a shared vision. This both de-risks and provides certainty.</p> <p>4.xxx Strategic Masterplans will be prepared on a staged basis, initially evaluating and agreeing baseline technical, character and design analysis and assessments, then agreeing a shared vision and set of place-making objectives, exploring and testing a series of options with stakeholder input and then the agreement of a preferred option and masterplan.</p> <p>4.xxx For large sites that are developed over a long time period, strategic masterplans may require review and be flexible to adapt to changing circumstances. A Strategic Masterplan is not a blueprint, it is a framework within which further planning and design instruction can emerge over time.</p>		
FM 067	53	Policy SP10(e)	<p>e. Work with Hertfordshire County Council and education providers to ensure the planning system contributes to the provision of sufficient school places and facilitates the provision of new or expanded schools in appropriate and accessible locations. This will include monitoring of projected future demand to inform the review of this plan in relation to secondary education provision for the Stevenage area;</p>	To ensure the plan is positively prepared and consistent with national policy in response to the Inspector's August 2019 letter.	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production
FM 068	54	After Paragraph 4.127 (new paragraph)	<p>Forecasting education demand that will arise from new developments over the long-term is challenging. It is difficult to predict with certainty how and when school places will be needed until developments are built and new families move in. This is a particularly complex issue in the Stevenage area where housing developments have been proposed by three local authorities (North Hertfordshire, East Hertfordshire and Stevenage) across a wide number and variety of sites contained in separate local plans. These plans set out allocations and requirements for secondary education that could meet demand well into the 2030s. However, this issue needs to be kept under review particularly as alternative sites and opportunities which supplement those identified in current Plans and / or better address the County Council's operational preferences may arise over this period. We will monitor long-term forecasts of demand with the County Council to inform the early review set out in Policy IMR2.</p>	To ensure the plan is positively prepared and consistent with national policy in response to the Inspector's August 2019 letter.	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production
MM 050 / FM 069	56	Policy SP12	<p>Policy SP12: Green infrastructure, <u>landscape and biodiversity</u> and landscape</p> <p>We will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced. We will:</p> <ul style="list-style-type: none"> a. Protect, enhance and manage the green infrastructure network and seek opportunities to create new green infrastructure; Protect, identify, manage and where possible enhance a strategic multi-functional network of green infrastructure; x. Consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty; x. Protect, enhance and manage sites in accordance with the following hierarchy of designations and features: <ul style="list-style-type: none"> • Internationally designated sites • Nationally designated sites • Locally designated sites; • Non-designated sites that include important habitats and species b. Protect, enhance and manage biodiversity networks including wildlife corridors, ancient woodlands and hedgerows, wetland and riverine habitats, Local Geological Sites, protected species, priority species and habitats, and non-designated sites of ecological value and seek opportunities for ensure measureable net gains for biodiversity; and c. Consider and respect landscape character and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty Protect other open spaces and support provision of new and improved open space. 	For effectiveness & consistency with national policy and in response to the Inspector's August 2019 letter (Paragraph 14) and following the Matter 28 hearing session	None – no modifications which impact upon criteria seeking to protect, enhance and manage European Sites
MM 056 /	57	Policy SP13	<p>Policy SP13: Historic environment</p>	For consistency with national policy and in response to the	None - does not result in any changes to the

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
FM 070			The Council will balance the need for growth with the proper protection and enhancement of the historic environment. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and the management of its setting. We will pursue a positive strategy for the conservation and enjoyment of the historic environment through: <ul style="list-style-type: none"> a. Maintaining a strong presumption in favour of the retention, preservation and enhancement of heritage assets and their setting according to their significance; b. Identifying sites on the national register of Heritage at Risk or on the Council's 'At Risk' local risk register; c. Periodic reviews of Conservation Areas and other locally designated assets; and d. Publication of detailed guidance. 	Inspector's August 2019 letter (Paragraph 12)	locations or quantum of development
MM 057 / FM 003	60	After Paragraph 4.174 (new paragraph)	All strategic sites will be masterplanned pro-actively and collaboratively with the Council and key stakeholders in accordance with Policy SP9 Design and Sustainability and the individual site policy requirements. Planning applications should be preceded by and consistent with an agreed Strategic Masterplan for the site. Adherence to the Strategic Masterplan and any further masterplanning and design requirements will be secured through conditions and/or legal agreements.	For effectiveness to support effective and comprehensive delivery	None - does not result in any changes to the locations or quantum of development
MM 058 / FM 004	61	Policy SP14	Policy SP14: Site BA1 – North of Baldock Land to the north of Baldock, as shown on the Proposals Policies map, is allocated as a strategic housing site for a new neighbourhood of approximately 2,800 homes. Planning permission for residential-led development will be granted where the following site-specific requirements are met: (a) A site masterplan to be approved prior to the submission of any detailed matters. A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council. Any planning application/s should be preceded by and consistent with an agreed Strategic Masterplan. Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission. Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole. Development proposals should provide the following planning and master planning requirements a) (b) A new mixed use local centre/s to provide for a range of day to day local needs including additional neighbourhood-level provision providing of around 500 m² (net) class A1 convenience retail provision and 1,400 m² (net) of other A class comparison retail and food and beverage floorspace ... [Remaining criteria re-labelled sequentially with no further changes]	For consistency with national policy and for effectiveness in supporting sustainable development, design quality and comprehensive delivery	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.
MM 061 / FM 005	63	Policy SP15	Policy SP15: Site LG1 – North of Letchworth Garden City Land to the north of Letchworth Garden City, as shown on the Proposals Policies map, is allocated as a strategic housing site for a new neighbourhood of approximately 900 homes. Planning permission for residential-led development will be granted where the following site-specific requirements are met: a. A masterplan to be approved prior to the submission of any detailed matters which also sets out: i. How the site will follow and implement Garden City principles A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council. This should follow and implement Garden City principles. Any planning application/s should be preceded by and consistent with an agreed Strategic Masterplan.	For legal compliance, consistency with national policy and for effectiveness in supporting sustainable development, design quality and comprehensive delivery	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.

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			<p>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</p> <p>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</p> <p>Development proposals should provide the following planning and master planning requirements</p> <ul style="list-style-type: none"> a. ii The most appropriate points of vehicle access considering landscape and traffic impacts b. How comprehensive integration into the existing pedestrian and cycle public transport and road networks will be secured c. iii An appropriate education solution with a presumption in favour of on site provision which delivers a new 2FE primary school on site d. iv Measures required to address nearby heritage assets including the Scheduled Ancient Monument at Radwell Lodge and the Croft Lane and Norton Conservation Areas e. The approach to trees and hedgerows around and within the site, with the presumption that trees will be retained and any hedgerow losses kept to a minimum f. b Neighbourhood level retail and community facilities providing including around 900 m² (net) of A class floorspace retail and food and beverage floorspace and a GP surgery <p>...</p> <p><i>[Remaining criteria re-labelled sequentially with no further changes]</i></p>		
MM 068 / FM 006	65	Policy SP16	<p>Policy SP16: Site NS1 – North of Stevenage</p> <p>Land to the north of Stevenage within Graveley parish, as shown on the Proposals Policies map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 900 homes. Planning permission for residential-led development will be granted where the following site-specific requirements are met:</p> <ul style="list-style-type: none"> a. A masterplan to be approved prior to the submission of any detailed matters <p>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council. Any planning application/s should be preceded by and consistent with an agreed Strategic Masterplan.</p> <p>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</p> <p>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</p> <p>Development proposals should provide the following planning and master planning requirements</p> <ul style="list-style-type: none"> a. b Integration with adjoining development in Stevenage Borough including site-wide solutions for access, sustainable travel, education, retail and other necessary medical and social infrastructure to include: <p>...</p> <p><i>[Remaining criteria re-labelled sequentially with no further changes]</i></p>	For consistency with national policy and for effectiveness in supporting sustainable development, design quality and comprehensive delivery	None – Site within Rye Meads STW catchment but modifications do not change overall quantum of development or operation of NE10 which provides mitigation. References to masterplanning (as defined by Policy SP9 – see assessment of that policy) reinforce findings of HRA
MM 072 / FM 007	67	Policy SP17	<p>Policy SP17: Site HT1 – Highover Farm, Hitchin</p> <p>Land to the east of Hitchin, as shown on the Proposals Policies map, is allocated as a strategic housing site for a new neighbourhood of approximately 700 homes. Planning permission for residential-led development will be granted where the following site-specific requirements are met:</p> <ul style="list-style-type: none"> a. A site masterplan to be approved prior to the submission of any detailed matters <p>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be approved prepared and agreed between the landowner/developer and the Council. Any planning application/s should be preceded by and consistent with an agreed Strategic Masterplan.</p>	For legal compliance, consistency with national policy and for effectiveness in supporting sustainable development, design quality and comprehensive delivery	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<p>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</p> <p>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</p> <p>Development proposals should provide the following planning and master planning requirements</p> <p>a. b. Neighbourhood level retail facilities providing approximately 500 m² (net) of A-class retail and food and beverage floorspace</p> <p>...</p> <p>[Remaining criteria re-labelled sequentially with no further changes]</p>		
MM 075 / FM 008	69	Policy SP18	<p>Policy SP18: Site GA2 – Land off Mendip, Great Ashby</p> <p>Land to the north-east of Great Ashby within Weston parish, as shown on the Proposals Policies map is allocated as a strategic housing site for a new neighbourhood of approximately 600 homes. Planning permission for residential-led development will be granted where the following site-specific requirements are met:</p> <p>a. A masterplan to be approved prior to the submission of any detailed matters</p> <p>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer, and the Council.</p> <p>Any planning application/s should be preceded by and consistent with an agreed Strategic Masterplan. Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</p> <p>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</p> <p>Development proposals should provide the following planning and master planning requirements</p> <p>a. b. Neighbourhood-level facilities providing approximately 500 m² (net) of A1-class retail and food and beverage floorspace and other necessary medical and social infrastructure</p> <p>...</p> <p>[remaining criteria relabelled sequentially with no further changes]</p>	For consistency with national policy and for effectiveness in supporting sustainable development, design quality and comprehensive delivery	None – Site within Rye Meads STW catchment but modifications do not change overall quantum of development or operation of NE10 which provides mitigation. References to masterplanning (as defined by Policy SP9 – see assessment of that policy) reinforce findings of HRA
MM 083 / FM 009	71	Policy SP19	<p>Policy SP19: Sites EL12, EL2 & EL3 – East of Luton</p> <p>Land to the east of Luton, as shown on the Proposals Policies map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 2,100 homes. Planning permission for residential-led development will be granted where the following site-specific requirements are met:</p> <p>a. A masterplan to be approved prior to the submission of any detailed matters</p> <p>A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council. Any planning application/s should be preceded by and consistent with an agreed Strategic Masterplan.</p> <p>Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.</p> <p>Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.</p> <p>Development proposals should provide the following planning and master planning requirements</p>	For consistency with national policy and for effectiveness in supporting sustainable development, design quality and comprehensive delivery	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<p>a.b- A new mixed use local centre/s to provide for a range of day to day local needs including with additional neighbourhood-level provision providing of around 250 m² (net) class A1 convenience retail provision and 850 m² of other A class of comparison retail and food and beverage floorspace and other necessary social infrastructure</p> <p>...</p> <p>[Remaining criteria re-labelled sequentially with no further changes]</p>		
MM 088 / FM 071	75	ETC1	<p>Policy ETC1: Appropriate uses in Employment Areas</p> <p>Within the safeguarded allocated Employment Areas, and the Employment Allocations (BA10 and RY9), as shown on the Policies Proposals Map, planning permission will be granted where for office, research and development, industrial processes, industrial and storage and distribution uses provided:</p> <ol style="list-style-type: none"> Within those parts of the Employment Areas designated for business use only, development is for Use Class B1; Elsewhere within Employment Areas, development is for Use Classes B1, B2 or B8; For allocated sites any relevant site-specific criteria are met; and Any Use Class B8 development is easily accessible from the primary road network. <p>Planning permission for other uses will be granted as an exception to the above criteria provided they are:</p> <ol style="list-style-type: none"> Ancillary to the above uses; Essential to the continued operation of an established premises; Would bring comparable benefits to office, research and development, industrial processes, industrial and storage and distribution a-B-class uses in the same location; or Would make use of a site that would otherwise be likely to become or remain vacant for an extended period of time. <p>Conditions and legal agreements will be used to limit uses to ensure that development meets, and will continue to meet, identified employment needs</p>	To ensure the Plan is positively prepared, legally compliant and effective in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 072	75	5.1	<p>Within the four main towns there are a number of established Employment Areas, where the majority of employment premises are located. They include B1 business, B2 general industrial and B8 storage and distribution uses certain E class uses (office, research and development, industrial processes), B2 (industrial) and B8 (storage and distribution) class uses. They are well-established areas and are a valuable resource to the District</p>	For legal compliance and effectiveness in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 073	76	5.5	<p>However, the Council recognises that Employment Areas are often sought-after locations for a number of other uses. It is recognised that there is a need for some flexibility to meet the needs of uses, including sui generis uses such as motor trade uses and taxi vehicle depots such as: tyre and exhaust centres, trade wholesalers, vehicle hire, plant hire, motor trade uses and taxi vehicle depots. These are often partial B uses, combining a retail element with a predominantly business, industrial or storage use, or are sui generis⁷¹. These uses tend to cause conflict in other parts of the towns, such as town centres or residential areas as a result of impacts on residential amenity and living condition</p> <p>⁷¹ 'Sui generis' is a term used to mean any use which does not fall within the use classes defined in the Use Classes Order.</p>	For effectiveness in following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 074	76	5.6	<p>Motor vehicle premises, in particular, usually include a mixture of sales and repairs. The sale of motor vehicles tends to provide lower density of employment than normally expected in an employment area. The amount of the retail sales element on larger developments will be restricted in order to protect the availability of, and maximise the use of, employment land. In addition, in order to prevent the change of use of buildings to Class A1 (shops) a condition will be imposed on any relevant grant of permission removing permitted development rights. These considerations apply to the sale of all types of vehicles</p>	For legal compliance and effectiveness in response to the Use Class Order amendments following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 075	76	5.7	<p>Development proposals for uses in employment areas that are not for office, research and development, industrial processes, industrial and storage and distribution uses which seek to make use of the exception criteria</p>	For effectiveness following the Matter 29 hearing as supported by	None – reflects updates to Government Use Class

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			<p>of this policy will be considered on their merits. When assessing such proposals, the Council will have regard to (as applicable in each instance):</p> <ul style="list-style-type: none"> • employment generation on site; • impact on relevant town centres, including details of any sequential and / or impact testing; • where appropriate, the level and type of retail involved on the site; • any potential benefits to the community or surrounding businesses from the proposed use; • the proportion of the site to be used for sales and display as opposed to repairs and servicing, in the case of motor trade uses; • accessibility by non-car modes of transport; and • any evidence clearly demonstrating that: <ul style="list-style-type: none"> • the land or premises is no longer required to meet future employment needs of the District; • the land or premises is inappropriate or unfeasible for employment use, based on market conditions or amenity / living condition problems; and • no other suitable sites outside designated employment areas are viable and available. and • details of any sequential and / or impact testing. 	the statement to that session and documents including ED203 and ED214.	Order and does not impact upon location or distribution of new development.
FM 076	76	After 5.8 (New paragraph)	The Council is required to make provision for sufficient employment land over the plan period. To ensure that development meets identified employment needs, both now and in the future, conditions and legal agreements will be used.	To ensure the Plan is positively prepared , following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 091 / FM 077	77	5.9	There are a number of employment sites across North Hertfordshire that are outside the designated Employment Areas and Employment Allocations but which provide sources of local employment and services. These are in other parts of the main towns including town centres, in category A larger villages, and sometimes within category B and C villages or in the countryside following the re-use or redevelopment of agricultural buildings. Some have been there for a long time and may not be in the most appropriate location while others exist perfectly well adjacent to other uses such as residential and / or in their wider setting. Planning Applications seeking non-employment uses on such sites will need to be supported with evidence that at least twelve months of active marketing has been undertaken. This will include an assessment of market signals, including that the marketing has been conducted appropriately given the terms, rental values and / or sales values of the site and similar properties, the benefits of the proposed uses and the impact on the community of such a loss of employment land.	For effectiveness following the Matter 26 hearing and consequential to amendments to Policy SP2	None – descriptive reference to villages and does not impact upon location or distribution of new development
MM 092 / FM 078	77	ETC3	<p>Policy ETC3: New retail, leisure and other main town centre development</p> <p>Planning permission for new retail, leisure and other main town centre uses development will be granted provided that where:</p> <ol style="list-style-type: none"> the sequential test is passed; where the town centre development is outside of the town centre, an impact assessment is are provided based on locally set the following minimum floorspace thresholds demonstrating there is no unacceptable harm to the vitality or viability of a designated town centre: <ul style="list-style-type: none"> • Hitchin: 2,500 gross sq.m and above; • Letchworth Garden City: 1,000 gross sq.m gross and above; • Baldock, Royston and elsewhere: 500 gross sq.m and above; within retail allocation sites, as shown on the Proposals Policies Map, any relevant site-specific criteria are met; the proposal is appropriate to the area in terms of use, size, scale, function, catchment area, historic and architectural character; and there would be no significant adverse impact upon living conditions. <p>The Council will use planning conditions or legal agreements to limit uses to ensure that the identified retail needs are met, and will continue to be met, through the allocated sites.</p>	For effectiveness following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.

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			* Main town centre uses are defined in the Local Plan Glossary [new footnote]		
FM 079	78	5.13	In assessing proposals for main town centre uses, we will adopt the 'sequential approach' as set out in Government guidance ⁷⁴ . Therefore, retail uses will be considered in the following order of preference: <ol style="list-style-type: none"> 1. within the primary or secondary shopping frontages of town centres, on allocated sites within town centres, or in local centres; 2. other parts of the town centres; 3. 2. the edge of centres; and 4. 3. out of centre, only where there are no available, suitable and viable sites which are sequentially preferable. 	For consistency with national policy following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 093 / FM 080	78	5.16	Nevertheless, the first preference for the location of leisure facilities is within the defined town centre boundaries. encompasses a wider area than retail as leisure uses should not be re-directed from the wider town centre areas to the primary shopping area. Therefore, the first preference for leisure facilities includes both the primary shopping area and wider town centre area.	For effectiveness following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – descriptive update
FM 081	78	After 5.19 (New Paragraph)	The Council is required to make provision for sufficient retail land over the plan period. To ensure that development meets identified retail needs, both now and in the future, conditions and legal agreements will be used.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 095 / FM 082	79	ETC4	Policy ETC4: Primary Shopping Frontages Town Centre boundaries for Hitchin, Letchworth Garden City and Royston are shown on the Proposals Policies Map. Within the designated Primary Shopping Frontages, planning permission will be granted at ground-floor level: <ol style="list-style-type: none"> a. for shops retail A1 uses; or b. Exceptionally for an A3 or similar other main town centre uses* if they do it does not, individually or cumulatively, undermine the retail function of the centre and where the proposal will attract people to the centre, enhancing in the daytime or detract from the centre's vitality and viability. * Main town centre uses are defined in the Local Plan Glossary [new footnote]	For legal compliance in response to the Use Class Order amendments and effectiveness following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 096 / FM 083	79	ETC5	Policy ETC5: Secondary Shopping Frontages In the Secondary Shopping Frontages of Hitchin, Letchworth Garden City, Baldock and Royston, as shown on the Proposals Policies Map, planning permission will be granted at ground-floor level: <ol style="list-style-type: none"> a. for retail, professional services and restaurants (A1, A2, or A3) shops, financial and professional services, restaurants and cafes, pubs or drinking establishments and takeaways; or b. exceptionally for other main town centre uses* if they do, it does not individually or cumulatively, undermine the retail function of the centre and where the proposal will attract people to the centre, enhancing or detract from the centre's vitality and viability. * Main town centre uses are defined in the Local Plan Glossary [new footnote]	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 084	79	5.21	Too many non- retail A1 uses can create 'dead frontages' (units not normally open during normal shopping hours or which attract relatively few customers), reduce the interest and attraction of the primary shopping area, and harm the retail function. This is particularly a problem where there are a number of units in a row which are not shops. This is something the Council is keen to prevent.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 085	80	5.23	Within Primary Frontages we will retain the attractiveness of the essential and continuous shopping cores of our town centres; only shops retail (A1) will generally be permitted here.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
MM 097 / FM 086	80	5.24	For Secondary Frontages, the policy is more flexible, allowing shops, financial and professional services, restaurants and cafes, pubs or drinking establishments and takeaways, retail, office and restaurant (A1, A2, and A3) uses based on their contribution to vitality and viability and their ability to attract people to the centre. Other uses such as pubs (A4) and hot food takeaways (A5) can add to an areas attractiveness and vitality, however, control is needed to ensure that these uses do not detract from the centre and affect the shopping pattern.	As above	development. None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 098 / FM 087	80	5.25	Evidence in the form of predicted footfall, opening times and linked trips will be required for any application seeking to meet part b of policies ETC4 and ETC5 to assess the impact upon daytime retail function, vitality and viability the exception criteria . Where a shop unit has been vacant for an extended period of time (normally at least six months one year), documentary evidence should demonstrate that all reasonable attempts to sell or let the premises for the preferred use(s) as set out in part a. of Policies ETC4 and ETC5 have failed.	For effectiveness following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214.	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 099 / FM 088	80	ETC6	<p>Policy ETC6: Local Centres</p> <p>Within Local Centres, as shown on the Policies Proposals Map or identified in approved masterplans for the strategic site allocations, planning permission will be granted where:</p> <p>a. it is for a shop, financial and professional services, café or restaurant, pub or drinking establishment, takeaway or use classes F1 or F2 use class A1, A2, A3, A4, A5, D1 or D2 at ground floor level; and</p> <p>b. The centre would continue to provide a range of uses, with the majority of units being retained in A1 use; and</p> <p>c. b. the centre would continue to provide a range of uses including shops to meet day-to-day needs and the vitality and viability of the centre would be maintained Any change of use from class A1 would:</p> <p>i. maintain the general vitality and viability of the centre; and</p> <p>ii. not seriously diminish the provision of local shopping facilities.</p> <p>Proposals for over 500 sq.m m² gross will not generally be suitable in local centres.</p>	For legal compliance in response to the Use Class Order amendments and effectiveness following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 089	80	5.29	The Council considers that it is important that the neighbourhood centres continue to provide a mix of shopping, services and community facilities, and in particular retail units. A predominance of shops is considered to be necessary to secure future viability of these centres. However, some non-retail uses may be appropriate in the centres where local community retail needs are already met this does not harm the mainly retail function.	For effectiveness following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 090	81	5.31	Where a vacant shop premises is subject to a proposed change of use where planning permission is required , then documentary evidence will be necessary to show that all reasonable attempts to sell or let it for use as a shop for a year or more have failed. If there are other vacant units in the centre this will also be taken into account.	For legal compliance in response to the Use Class Order changes following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
FM 091	81	5.32 (delete paragraph)	The Council may consider other non-retail uses, such as surgeries or other community and leisure uses appropriate, if it can be demonstrated that they would meet a local community need.	As above	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
MM 100 / FM 092	100	Policy ETC7	<p>Policy ETC7: Scattered Local community shops and services in towns and villages</p> <p>Planning permission for small-scale proposals providing new shops and services will be granted within existing settlements to serve the day-to-day needs of the local community as an exception to the sequential approach set out in Policy ETC3(a) will be granted where:</p>	For legal compliance in response to the Use Class Order amendments and effectiveness following the Matter 29 hearing	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings																		
			<ul style="list-style-type: none"> The site is within a defined settlement boundary; In the case of Category B villages, the site is within the built core; or In the case of Category C settlements, the proposed development meets the criteria of Policy CGB2b. <p>280 sqm will generally be used as a guide to determine small scale. This reflects the Use Classes Order 2020 and recognises that some such facilities will fall within Class E or other use classes</p> <p>Planning permission for the loss or change of use of any shops, services or facilities outside the defined retail hierarchy will be granted where:</p> <ol style="list-style-type: none"> there is another shop, service or facility of a similar use available for customers within an 800m convenient walking distance; and the proposed replacement use would complement the function and character of the area. <p>An exception to criterion (a) above will only be permitted if it can be demonstrated that the unit is no longer required to meet the needs of the local community, including through evidence of at least twelve months active marketing. has remained vacant for a year or more, and documentary and viability evidence has been provided that all reasonable attempts to sell or let the premises for similar uses in that period have failed.</p>		development.																		
MM 110 / FM 093	85	6.6	However, on occasion a small-scale need may still be identified for affordable housing or other types of community facilities to meet rural needs which cannot be met within the adjusted settlement boundaries of the main towns and villages. This policy continues North Hertfordshire's historic approach of allowing specified development on exception sites.	For effectiveness following Matter 26 hearing and consequential to amended Policy SP2	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.																		
FM 094	91	After 7.4 (Table 1)	<table border="1"> <thead> <tr> <th></th> <th>Transport Statement</th> <th>Transport Assessment</th> </tr> </thead> <tbody> <tr> <td>Residential (C3)</td> <td>>50 homes</td> <td>>80 homes</td> </tr> <tr> <td>Business (Use Class B1)</td> <td>>1,500m2 Gross Floor Area (GFA)</td> <td>>2,500m2 GFA</td> </tr> <tr> <td>Industrial (B2)</td> <td>>2,500m2 GFA</td> <td>>4,000m2 GFA</td> </tr> <tr> <td>Warehousing (B8)</td> <td>>3,000m2 GFA</td> <td>>5,000m2 GFA</td> </tr> <tr> <td>Non-food retail</td> <td>>800m2 GFA</td> <td>>1,500m2 GFA</td> </tr> </tbody> </table>		Transport Statement	Transport Assessment	Residential (C3)	>50 homes	>80 homes	Business (Use Class B1)	>1,500m2 Gross Floor Area (GFA)	>2,500m2 GFA	Industrial (B2)	>2,500m2 GFA	>4,000m2 GFA	Warehousing (B8)	>3,000m2 GFA	>5,000m2 GFA	Non-food retail	>800m2 GFA	>1,500m2 GFA	For legal compliance in response to the Use Class Order changes following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – reflects updates to Government Use Class Order and does not impact upon location or distribution of new development.
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Residential (C3)	>50 homes	>80 homes																					
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MM 139 / FM 095	98-99	Policy HS7	<p>Policy HS7: Gypsies, Travellers and Travelling Showpeople</p> <p>Land at Pulmore Water, as shown on the Proposals Map, is allocated for the provision of 7 permanent Gypsy and Traveller pitches to meet the District's needs up to 2031.</p> <p>The Council will protect existing and allocated lawful pitches for Gypsies and Travellers.</p> <p>The following site, as shown inset into the Green Belt on the Policies Map, is allocated for the provision of permanent Gypsy and Traveller pitches to meet the District's needs up to 2031:</p> <ul style="list-style-type: none"> Policy CD6 - Land at Woodside Place, Danesbury Park Road is allocated for the provision of 4 permanent Gypsy and Traveller pitches. <p>This site is allocated solely for the accommodation of Gypsy and Travellers that meet the planning definition. Planning Permission will only be granted for development and occupation that meets the planning definition of Gypsy and Travellers. Other uses will not be permitted.</p> <p>There is no identified need to allocate any transit or travelling showpeoples' sites.</p> <p>Planning permission for accommodation for Gypsies and Travellers or Travelling Showpeople will be granted where:</p> <ol style="list-style-type: none"> it satisfies a demonstrated local need for accommodation; the intended occupants meet the planning definition of Gypsies and Travellers, or Travelling Showpeople, as set out in government guidance or case law; 	To ensure the plan is, justified and consistent with national policy following the Matter 25 hearing as supported by the statement to that sessions and documents including ED228	None - This modification results in the proposed deletion from the Plan of an allocation that was previously screened into the HRA but does not impact upon the overall HRA findings.																		

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
			<p>c. residents of the proposed site can access local services such as shops, schools, public transport and medical facilities within a reasonable distance from the site and where those facilities have capacity to meet the needs of the site's residents;</p> <p>d. the proposed site:</p> <ul style="list-style-type: none"> i. does not conflict with any other development plan policy or national policy including flood risk, agricultural land classification, contamination and hazardous development, and has no significant adverse impact on the character and appearance of the countryside, or on features of significant biodiversity or heritage importance; ii. has no significant adverse impact on the amenity of nearby residents or adjoining land users and can be successfully screened and contained within a specified boundary; iii. has adequate and safe access from a suitable road, and adequate parking, storage, turning and servicing on site; iv. is capable of being serviced with water, electricity, sewerage and rubbish disposal; and v. will provide a safe, inclusive and secure environment for the residents in an appropriate location to meet their needs. <p>Where all the above criteria are met, proposals for sites for Gypsies, Travellers and Travelling Showpeople may be appropriate in the countryside as rural exception sites (in line with Policy CGB2b) but Green Belt policies would still apply.</p>		
MM 140 / FM 096	99	Paragraph 8.41	<p>The Local Plan should make appropriate provision to meet the needs of Gypsies, Travellers and Travelling Showpeople in North Hertfordshire. There is recognition that the three groups are different and have very different needs, but for the purposes of this policy the key considerations are very similar. The Council's evidence* shows that there is no identified need for transit or travelling show people sites but a need to provide four additional pitches for Gypsies at Danesbury Park Road.</p> <p>* Gypsy & Traveller Accommodation Assessment Study (2018); NHDC Note on Gypsy and Traveller provision (2020)</p>	To ensure the plan is, justified and consistent with national policy consequential to FM095 [Policy HS7]	None – supporting text which describes the policy outcome assessed in consideration of FM095 [Policy HS7]
MM 141 / FM 097	99	Paragraph 8.42	<p>There is currently one private Traveller site at Pulmore Pulmer Water in the parish of Codicote. This consists of twelve permanent pitches and six temporary pitches. There is a further site at Danesbury Park Road which currently benefits from a temporary planning permission and is allocated in this Local Plan to meet the identified need. There are no public sites in the District. Historically, the District has not been an area where significant numbers of Gypsies, Travellers or Travelling Showpeople have resided in or resorted to, which is supported by figures for unauthorised encampments and developments.</p>	To ensure the plan is, justified and consistent with national policy consequential to FM095 [Policy HS7]	None – supporting text which describes the policy outcome assessed in consideration of FM095 [Policy HS7]
MM 142 / FM 098	99	Paragraph 8.44 (delete)	<p>Our evidence identifies a requirement for 7 additional pitches over the period to 2031. The area covered by the temporary planning permission on the Pulmore Water site meets requirement though the existing permission expires in 2017.</p>	To ensure the plan is, justified and consistent with national policy consequential to FM095 [Policy HS7]	None – supporting text which describes the policy outcome assessed in consideration of FM095 [Policy HS7]
MM 143 / FM 099	100	Paragraph 8.45	<p>This area is therefore allocated for permanent provision and to provide certainty going forward. Based on current evidence, it should prevent the need for future 'single issue' reviews of this policy and the long term needs of these communities will be considered as part of the next general review of the plan alongside the needs of the settled community. The site at Pulmer Water has a complex planning history and consists of Gypsy and Traveller provision adjoining a caravan park with permission for residential use. A robust and up-to-date assessment of current occupation and the future needs arising from this site, alongside any needs from elsewhere in the District, will be required to inform the proposed early review of the Plan (see Policy IMR2 in the Delivery Chapter).</p>	To ensure the plan is, justified, effective and consistent with national policy consequential to FM095 [Policy HS7]	None – supporting text which describes the policy outcome assessed in consideration of FM095 [Policy HS7] and approach to future review which will be subject to relevant environmental assessment at the time of its production
MM 166 / FM 100	113	After paragraph 11.14 (New Policy NEX)	<p>Policy NEX: Biodiversity and geological sites</p> <p>Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of</p>	For effectiveness & consistency with national policy in response to the Inspector's August 2019 letter (paragraph 14) and following the	None - This policy sets out the detailed approach to and operation of Policy SP12. Latest modifications

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings
		and supporting text)	<p>designations and features listed in policy SP12. All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible. Applicants should, having regard to the status of any affected site(s) or feature(s):</p> <ol style="list-style-type: none"> a. submit an ecological survey that is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site; b. demonstrate that adverse effects can be avoided and / or satisfactorily minimised having regard to the hierarchy of protection below: <ol style="list-style-type: none"> i. locating on an alternative site with a less harmful impact; ii. providing adequate mitigation measures; or iii. as a last resort compensated for. <p>The acceptability of approach(es) to avoidance, mitigation and compensation will be commensurate with the status of the asset(s) likely to be affected by the application; Compensation is unlikely to be an appropriate solution for proposals affecting nationally or internationally designated sites other than in the most exceptional circumstances.</p> c. Include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction; d. Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites (locally designated sites and above), trees and hedgerows^v. It may be necessary to exceed this distance for fragile habitats such as ancient woodland or to provide appropriate root protection for mature trees; and e. provide a long-term management and monitoring plan including mitigation measures as necessary. <p>Local Geological Sites are ratified by the Herts & Middlesex Wildlife Trust (HMWT) and are afforded the same protection as Local Wildlife Sites.</p> <p>11.xx Sites allocated in this Plan that have the potential to impact on designated biodiversity sites are required to provide an ecological survey and provide mitigation and/or off-setting measures as necessary. Where appropriate the Strategic Policies and Communities sections of this Plan provide site-specific policies relating to the impact on designated sites, for instance on Therfield Heath SSSI or Wain Woods SSSI.</p> <p>11.xx Sites can contain important habitats or species even where they are not formally designated. These may be identified by the Hertfordshire Environmental Records Centre, other relevant sources (such as the Government's 'MAGIC' mapping tool) or through the survey process as being of ecological interest and should be afforded an appropriate level of protection.</p> <p>11.xx Ecological surveys will be expected to involve an objective assessment of ecological value and identify any priority habitat, protected or priority species on site with survey data and site assessment to establish the potential impact. Surveys should be consistent with BS42020 Biodiversity- Code of Practice for Planning and Development, or as superseded, and use the DEFRA Biodiversity Metric^w, or as superseded, or any statutorily prescribed alternative to assess ecological value and deliver measurable net gain.</p> <p>11.xx Development proposals will be expected to maximise opportunities for net gains, or contribute to improvements in biodiversity. This methodology will ensure that appropriate mitigation or compensation is provided to meet the aims of national policy and is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site.</p> <p>11.xx Where off-site compensation is delivered as a last resort, the ecological networks mapping system developed by the Herts and Middlesex Wildlife Trust and Local Nature Partnership should be used. This provides</p>	Matter 28 hearing	do not substantively alter the operation of this policy in relation to European Sites as previously assessed in the HRA

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
			<p>the basis of targeted habitat creation to maximise the benefits to biodiversity of any required ecological measures.</p> <p>11.xx Certain habitats (such as chalk grassland) are priority habitats for the District. Restoration, mitigation and any compensation measures should focus on these priority habitats as described in the Hertfordshire Biodiversity Action Plan.^x</p> <p>11.xx Developments are required to demonstrate how existing wildlife habitats such as trees, hedgerows, woodlands and rivers (and any connective features between them) will be retained, safeguarded and managed during and after development, including the provision of buffers where required.</p> <p>11.xx Where necessary, a management plan outlining mitigation and monitoring measures may be required to sensitively manage any issues arising as a result of the development on biodiversity or geodiversity assets and will be secured through planning conditions or obligations.</p> <p>11.xx Net gains can be delivered through the provision of soft landscaping, including trees, shrubs and other vegetation to support wildlife habitats as identified by the Hertfordshire Biodiversity Action Plan^z. Similarly, the provision of permanent integrated features for wildlife can contribute to net gains, for instance the provision of bat and swift boxes, particularly where development borders open space.</p> <p>Footnotes: ^w The DEFRA Biodiversity Metric is a tool used to quantify the value of biodiversity at any site and can form an evidence base on required mitigation for a development, the amount of residual biodiversity impact, and if necessary, the amount of require offsite compensation. The current Biodiversity Metric is available at : http://publications.naturalengland.org.uk/publication/5850908674228224 ^xHertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, http://www.hef.org.uk/nature/biodiversity_vision/index.htm ^y North Hertfordshire District Green Infrastructure Plan (2009) ^z Hertfordshire Environmental Forum (2006) A Biodiversity Action Plan for Hertfordshire, http://www.hef.org.uk/nature/biodiversity_vision/index.htm</p>								
		ASHWELL									
MM 201 / FM 101	135	Paragraph 13.7	One housing site is identified No sites are allocated for housing in Ashwell for 33 new homes. 62 117 further homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
MM 202 / FM 102	135	Policy AS1	<table border="1"> <tr> <td>Land west of Claybush Road</td> <td>33 homes</td> </tr> <tr> <td> <ul style="list-style-type: none"> Provision of pedestrian access into the village; Sensitive design and layout required in terms of ridge line and setting within landscape, additional planting on the east and west boundaries to improve views from Arbury Banks and screen properties on Claybush Road; Heritage Impact Assessment required informing design and layout at southern extent of site to respect setting of Arbury Banks Scheduled Ancient Monument and the views of St Marys Church; and Provide archaeological survey prior to development. </td> <td></td> </tr> </table>	Land west of Claybush Road	33 homes	<ul style="list-style-type: none"> Provision of pedestrian access into the village; Sensitive design and layout required in terms of ridge line and setting within landscape, additional planting on the east and west boundaries to improve views from Arbury Banks and screen properties on Claybush Road; Heritage Impact Assessment required informing design and layout at southern extent of site to respect setting of Arbury Banks Scheduled Ancient Monument and the views of St Marys Church; and Provide archaeological survey prior to development. 		For effectiveness – site has been developed	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment		
Land west of Claybush Road	33 homes										
<ul style="list-style-type: none"> Provision of pedestrian access into the village; Sensitive design and layout required in terms of ridge line and setting within landscape, additional planting on the east and west boundaries to improve views from Arbury Banks and screen properties on Claybush Road; Heritage Impact Assessment required informing design and layout at southern extent of site to respect setting of Arbury Banks Scheduled Ancient Monument and the views of St Marys Church; and Provide archaeological survey prior to development. 											
MM 203 / FM 103	135	Table after Policy AS1 (delete)	<table border="1"> <tr> <td>Total allocated sites</td> <td>33 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>62 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>95 homes</td> </tr> </table>	Total allocated sites	33 homes	Completions and permissions	62 homes	Total allocated, completed and permitted	95 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	33 homes										
Completions and permissions	62 homes										
Total allocated, completed and permitted	95 homes										
FM 104	136	Paragraphs 13.9 to 13.12 (delete)	Infrastructure & mitigation 13.9—The impact of the proposed site on heritage assets and the landscape is a key consideration. Our overall evidence base concludes that, in order to meet our housing requirements over the plan period, it will be necessary to allocate some sites which may impact upon heritage assets and landscape. Our aim will be to ensure that the overall integrity of relevant heritage assets are protected and that the development is designed to minimise impact on the landscape.	For effectiveness consequential to FM 102 [delete site AS1]	None – deletion of supporting text consequential to deletion of relevant site policy						

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
			<p>13.10 Currently there is no pedestrian access along Claybush Road, therefore the development should deliver a pedestrian access route into the village to enable access to services and facilities.</p> <p>13.11 The footpath network in Ashwell currently extends to the junction of Bear Lane and Ashwell Street and there may be opportunities to connect from here from the north of the allocated site.</p> <p>13.12 Additional education provision will be needed in Ashwell during the Plan period, funding will therefore be sought to ensure the local education infrastructure can accommodate the additional demand arising from the site.</p>								
BALDOCK											
MM 205 / FM 105	137	Paragraph 13.19	<p>8 Eight housing sites are allocated in and around Baldock. These will deliver an estimated 3,436 3,360 new homes (3,136 1,960 during the plan period to 2031). A further 154 238 new homes have been built or granted planning permission since the start of the plan period in 2011.</p>	Positively prepared ; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
MM 207 / FM 106	138	Policy BA3	<table border="1"> <tr> <td>Land south of Clothall Common (Clothall parish)</td> <td>200 245 homes</td> </tr> </table> <ul style="list-style-type: none"> • Deliver, in combination with Site BA4, a southern link road connecting Wallington Road to the B656 Royston Road to Wallington Road or the A507 Clothall Road within the southern bypass; • Provision of suitable vehicle, cycle and pedestrian links to ensure integration with adjoining site BA4; • Consideration of the most appropriate routes and movements for all modes between the allocation site, the existing Clothall Common estate and the wider transport network • Site layout to take account of existing wastewater infrastructure; • Appropriate solution for short- and long-term education requirements having regard to up-to-date assessments of need; • Appropriate mitigation measures for noise associated with the A505 to potentially include appropriate insulation and orientation of living spaces; • Maintaining or limited re-profiling of the existing bunding towards the east of the site with no housing permitted on or beyond its (revised) alignment; • Incorporate alignment of former Wallington Road and Bridleway Clothall 027 as green corridor along northern perimeter of through the site; • Incorporate ordinary watercourses (and any appropriate measures) within comprehensive green infrastructure and / or SUDs approach; • Address existing surface water flood risk issues, including any run-off through SUDs or other appropriate solution; • Proposals to be informed by a site-specific landscape assessment; • Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate protection of adjacent Scheduled Ancient Monument; and • Archaeological survey to be completed prior to development. 	Land south of Clothall Common (Clothall parish)	200 245 homes	For effectiveness to address concerns raised by respondents to the Main Modifications consultation and in response to the Inspector's July Letter (Paper E)	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.				
Land south of Clothall Common (Clothall parish)	200 245 homes										
MM 210 / FM 107	140	Table After Policy BA11	<table border="1"> <tr> <td>Total allocated sites*</td> <td>3,386 3,360 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>204 238 homes</td> </tr> <tr> <td>Total allocated, completed and permitted 2011-2031*</td> <td>3,290 2,198 homes</td> </tr> </table> <p>* Land North of Baldock is allocated for 2,800 homes in total with 2,500 1,400 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031</p>	Total allocated sites*	3,386 3,360 homes	Completions and permissions	204 238 homes	Total allocated, completed and permitted 2011-2031*	3,290 2,198 homes	Positively prepared ; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
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Total allocated, completed and permitted 2011-2031*	3,290 2,198 homes										
BARKWAY											
MM 213 / FM 108	143	Paragraph 13.35	<p>Barkway is identified as a Category A one of five villages where a greater amount of development has been allocated. in the settlement hierarchy and it is the largest in population terms of three villages located in the area to the east of the A10 and to the south of Royston. Despite this, facilities are limited and so residents would presently be likely to travel to either Royston to the north or Buntingford to the south for many day to day items. A development boundary is shown on the Proposals Policies Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to allow for Barkway's development needs during this Plan period.</p>	For effectiveness following Matter 26 hearing session	None – descriptive update of the status of the village						
MM 214 /	143	Paragraph 13.37	<p>Three Two sites are allocated in Barkway for an estimated 173 160 new homes. A further 31 57 homes have been built or granted planning permission within the parish since 2011.</p>	Positively prepared ; Updated housing monitoring information	None – factual update as to the numbers of site						

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
FM 109					allocations and / or homes completed or permitted						
FM 110	144	Policy BK1 (delete)	<p>Land off Cambridge Road 13 homes</p> <ul style="list-style-type: none"> Site layout designed to integrate with any future use of adjoining reserve school site; Appropriate treatment of northern boundary to maintain integrity of Bridleway Barkway 017; Sensitive design to respect setting of Barkway Conservation Area and Cokenach Registered Park and Garden to include: <ul style="list-style-type: none"> Reinforcing hedgerows and landscaping along southern boundary of site; and Access arrangements designed to minimise harm to heritage assets 	For effectiveness – site has been developed - as supported by document ED191B	None – modifications result in deletion of policy previously screened out as outside Rye Meads STW catchment						
MM 215 / FM 111	144	Policy BK2	<p>Land off Windmill Close 20 homes</p> <ul style="list-style-type: none"> Part of the site to be retained as open space; and Contribution towards travel by sustainable modes of transport between Barley and Barkway schools Archaeological survey to be completed prior to development 	To ensure the Plan is positively prepared, justified and effective following Matter 31 Hearing Session	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.						
MM 216 / FM 112	144	Policy BK3	<p>Land between Cambridge Road & Royston Road 140 homes</p> <ul style="list-style-type: none"> Development should be set back from the road; Lower density housing would be appropriate on the eastern part of the site; Incorporation of footpath Bridleway Barkway 017 as a north-south green corridor through the site; Appropriate treatment of northern boundary to maintain alignment and integrity of Bridleway Barkway 018 Explore opportunities for connecting road from Royston Road to Cambridge Road having regard to heritage considerations (below); Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for pedestrian and cycle access; Contribution towards travel by sustainable modes of transport between Barley and Barkway schools Provision of local convenience shop; Approximately 1.5 hectares of land secured as a reserve site for primary education; Site layout designed to integrate with any future use of land identified for adjoining reserve school site; Development should include extensive tree planting, maintenance of the existing boundaries and hedgerows. Development should include measures to minimise impact on Newsells Park Stud, in terms of proximity of built development, noise and increased activity; Sensitive design to respect setting of Cokenach Registered Park and Garden and listed buildings within Newsells estate to include: <ul style="list-style-type: none"> Reinforcing of hedgerows and landscaping along site boundaries; and Access arrangements designed to minimise harm to heritage assets 	As above	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.						
MM 217 / FM 113	144	Table after Policy BK3	<table border="1"> <tr> <td>Total allocated sites</td> <td>173 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>31 57 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>204 230 homes</td> </tr> </table>	Total allocated sites	173 homes	Completions and permissions	31 57 homes	Total allocated, completed and permitted	204 230 homes	Positively prepared; Updated housing monitoring information	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	173 homes										
Completions and permissions	31 57 homes										
Total allocated, completed and permitted	204 230 homes										
MM 219 / FM 114	144	Paragraph 13.39	The existing first school site in Barkway is federated with the first school in neighbouring Barley with different year groups taught in each village. Current estimates suggest that the additional pupils likely to arise from the sites in Barkway can be accommodated in the existing schools. Contributions to support sustainable travel between the two sites should be secured from new developments. Both school sites are constrained and is are considered difficult to expand. Hertfordshire County Council hold a reserve school site in the village, lying between sites BK1 and within site BK3. This A reserve site will be retained providing the opportunity to respond to the any further increase in the number of dwelling for the pupils from the two villages.	To ensure the Plan is positively prepared, justified and effective following Matter 31 Hearing Session	None – relates to site outside of the Rye Meads STW catchment						
FM 115	145	Paragraph 13.40	We will work with the County Council and Diocese (who operate the schools in Barkway and Barley) to explore the most appropriate long-term education solutions.	As above	None – relates to site outside of the Rye Meads STW catchment						

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings				
		BARLEY							
FM 116		Paragraph 13.46	There are no sites allocated for residential development in Barley. Four 17 homes have been granted planning permission or built since 2011.	Positively prepared ; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
		BYGRAVE							
FM 117		Paragraph 13.51	Our Strategic Housing Site to the north of Baldock (see Policy SP14) is mostly within the parish of Bygrave. No other housing sites are allocated in Bygrave. There have been no planning permissions granted or new two homes built or granted planning permission in the parish since 2011.	Positively prepared ; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
		CODICOTE							
MM 222 / FM 118	152	Paragraph 13.74	Codicote is identified as a Category A one of five villages where a greater amount of development has been allocated . The development boundary shown on the Proposals Policies Map to indicate the area within which further development will be allowed. The boundary has been drawn so as to encompass the existing developed extent but also allow for Codicote's future development needs.	For effectiveness following Matter 26 hearing	None – descriptive update of the status of the village				
MM 223 / FM 119	152	Paragraph 13.77	Four sites are allocated in and around Codicote village for an estimated 315 new homes. A further 49 97 homes have been built or granted planning permission with in the parish since 2011.	Positively prepared ; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
MM 224 / FM 120	152	Policy CD1 (3 rd and 4 th bullets)	<table border="1"> <tr> <td>Land south of Cowards Lane</td> <td>73 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access; Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site; Contribution towards expansion of Codicote Primary School; Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; Sensitive design, particularly at north-east of site, to prevent adverse impact upon setting of Listed Buildings on High Street; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon Hollards Hollards Farm Meadow Local Wildlife Site and adjoining priority woodland habitat. </td> </tr> </table>	Land south of Cowards Lane	73 homes	<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access; Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site; Contribution towards expansion of Codicote Primary School; Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; Sensitive design, particularly at north-east of site, to prevent adverse impact upon setting of Listed Buildings on High Street; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon Hollards Hollards Farm Meadow Local Wildlife Site and adjoining priority woodland habitat. 		For effectiveness in response to the Inspector's August 2019 letter (Paragraph 8)	None - Within Rye Meads STW catchment but does not result in change to quantum of development or operation of Policy NE10
Land south of Cowards Lane	73 homes								
<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Sensitive integration into existing village, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access; Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site; Contribution towards expansion of Codicote Primary School; Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; Sensitive design, particularly at north-east of site, to prevent adverse impact upon setting of Listed Buildings on High Street; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon Hollards Hollards Farm Meadow Local Wildlife Site and adjoining priority woodland habitat. 									
MM 225 / FM 121	153	Policy CD2 (2 nd and 3 rd bullets)	<table border="1"> <tr> <td>Codicote Garden Centre, High Street</td> <td>54 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site; Contribution towards expansion of Codicote Primary School; Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; Access through site to adjoining sports field and community centre; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon adjoining priority deciduous woodland habitat; Sensitive design taking opportunities to enhance setting of Grade II* Listed Church of St Giles; Retain and strengthen existing boundary hedgerows. </td> </tr> </table>	Codicote Garden Centre, High Street	54 homes	<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site; Contribution towards expansion of Codicote Primary School; Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; Access through site to adjoining sports field and community centre; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon adjoining priority deciduous woodland habitat; Sensitive design taking opportunities to enhance setting of Grade II* Listed Church of St Giles; Retain and strengthen existing boundary hedgerows. 		For effectiveness in response to the Inspector's August 2019 letter (Paragraph 8)	None – Within Rye Meads STW catchment but does not result in change to quantum of development or operation of Policy NE10
Codicote Garden Centre, High Street	54 homes								
<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site; Contribution towards expansion of Codicote Primary School; Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; Access through site to adjoining sports field and community centre; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Consider and mitigate against potential adverse impacts upon adjoining priority deciduous woodland habitat; Sensitive design taking opportunities to enhance setting of Grade II* Listed Church of St Giles; Retain and strengthen existing boundary hedgerows. 									

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
MM 226 / FM 122	153	Policy CD3 (1 st and 2 nd bullets)	<table border="1"> <tr> <td>Land north of The Close</td> <td>48 homes</td> </tr> </table> <ul style="list-style-type: none"> • Appropriate solution for expansion of Codicote Primary School to be secured to accommodate additional pupils arising from this site; • Contribution towards expansion of Codicote Primary School; • Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; • Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; • Address existing surface water flood risk issues through SUDs or other appropriate solution; • Sensitive incorporation of Footpaths Codicote 007 and 008 as perimeter features around within the site and providing a connection from the High Street to the wider countryside; • Heritage impact assessment (including assessment of significance) and sensitive design to ensure appropriate approach to nearby Grade II* listed The Bury. 	Land north of The Close	48 homes	For effectiveness in response to the Inspector's August 2019 letter (Paragraph 8)	None – Within Rye Meads STW catchment but does not result in change to quantum of development or operation of Policy NE10				
Land north of The Close	48 homes										
MM 227 / FM 123	153	Policy CD5 (1 st and 2 nd bullets)	<table border="1"> <tr> <td>Land south of Heath Lane</td> <td>140 homes</td> </tr> </table> <ul style="list-style-type: none"> • Land broadly to the east of the current alignment of footpath Codicote 014 to be reserved and secured for education use to enable for expansion of the existing school to accommodate additional pupils arising from the allocated sites; • Transport Assessment to consider the cumulative impacts of sites CD1, CD2, CD3 and CD5 on the village centre and minor roads leading to/from Codicote and secure necessary mitigation or improvement measures; • Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery; • Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; • Consider and mitigate against potential adverse impacts upon nearby features of biodiversity interest including: <ul style="list-style-type: none"> ○ Codicote Lodge Icehouse & surrounds Local Wildlife Site; ○ Heath Plantation Local Wildlife Site; ○ Meadow NW of First Spring Local Wildlife Site; and ○ Priority deciduous woodland habitat adjoining the site; • Sensitive incorporation of existing rights of way, including footpaths Codicote 014, 015 & 016 as green corridors through the site connecting the existing village to the wider countryside; • Proposals to be informed by a site-specific landscape assessment, particularly ensuring development at the south-west of the site does not encroach beyond acceptable limits into longer views across the Mimram Valley; • Lower density of development to southern edge of site to respect local character; and • Sensitive treatment of Heath Lane frontage to minimise impact upon nearby Listed Buildings. 	Land south of Heath Lane	140 homes	For effectiveness in response to the Inspector's August 2019 letter (Paragraph 8)	None – Within Rye Meads STW catchment but does not result in change to quantum of development or operation of Policy NE10				
Land south of Heath Lane	140 homes										
MM 228 / FM 124	154	Table after Policy CD5	<table border="1"> <tr> <td>Total allocated sites</td> <td>315 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>49 97 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>364 412 homes</td> </tr> </table>	Total allocated sites	315 homes	Completions and permissions	49 97 homes	Total allocated, completed and permitted	364 412 homes	Positively prepared ; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	315 homes										
Completions and permissions	49 97 homes										
Total allocated, completed and permitted	364 412 homes										
MM 229 / FM 125	154	Paragraph 13.78	A site adjoining the existing Gypsy and Traveller site at Danesbury Park Road Pulmore Water has been identified for four six additional Gypsy and Traveller pitches to meet identified needs .	To ensure the Plan is justified and consistent with national policy consequential to FM095 [Policy HS7]	None – supporting text which describes the policy outcome assessed in consideration of FM095 [Policy HS7]						
MM 230 / FM 126	154	Policy CD4 (delete)	<table border="1"> <thead> <tr> <th>Ref</th> <th>Site</th> <th>Pitch estimate</th> </tr> </thead> <tbody> <tr> <td>CD4</td> <td>Land at Pulmore Water, St Albans Road</td> <td>6</td> </tr> </tbody> </table>	Ref	Site	Pitch estimate	CD4	Land at Pulmore Water, St Albans Road	6	As above	None – reflects outcome assessed in consideration of FM095 [Policy HS7]
Ref	Site	Pitch estimate									
CD4	Land at Pulmore Water, St Albans Road	6									
GRAVELEY											

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
		AND NORTH OF STEVENAGE									
MM 236 / FM 127	155	Table after Policy GR1	<table border="1"> <tr> <td>Completions and permissions</td> <td>8 10 homes</td> </tr> <tr> <td>Total allocated, completed and permitted 2011-2031*</td> <td>916 793 homes</td> </tr> </table> <p>* Land North of Stevenage is allocated for 900 homes in total with 775 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031</p>	Completions and permissions	8 10 homes	Total allocated, completed and permitted 2011-2031*	916 793 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted		
Completions and permissions	8 10 homes										
Total allocated, completed and permitted 2011-2031*	916 793 homes										
		HEXTON									
MM 246 / FM 128	159	Paragraph 13.111	There are no sites allocated for residential development in Hexton. Planning permission has been granted for one four new homes since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
		HITCHIN									
MM 248 / FM 129	162	Paragraph 13.126	Seven sites are allocated in and around Hitchin for an estimated 1,009 971 new homes. The significant majority of these will be built at our Strategic Housing Site at Highover Farm. A further 638 871 homes have been built or granted planning permission in Hitchin since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
MM 254 / FM 130	163	Table after Policy HT10	<table border="1"> <tr> <td>Total allocated sites</td> <td>1,009 971 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>638 871 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>1,647 1,842 homes</td> </tr> </table>	Total allocated sites	1,009 971 homes	Completions and permissions	638 871 homes	Total allocated, completed and permitted	1,647 1,842 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	1,009 971 homes										
Completions and permissions	638 871 homes										
Total allocated, completed and permitted	1,647 1,842 homes										
MM 262 / FM 131	165	Policy HT11	<table border="1"> <tr> <td>Churchgate and its surrounding area</td> <td>Mixed-use</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> Redevelopment to provide approximately 4,000 m² of gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] </td> </tr> </table>	Churchgate and its surrounding area	Mixed-use	<ul style="list-style-type: none"> Redevelopment to provide approximately 4,000 m² of gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] 		For legal compliance in response to the Use Class Order changes following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.		
Churchgate and its surrounding area	Mixed-use										
<ul style="list-style-type: none"> Redevelopment to provide approximately 4,000 m² of gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] 											
MM 263 / FM 132	165	Policy HT12	<table border="1"> <tr> <td>Paynes Park</td> <td>Mixed-use</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> Redevelopment to provide approximately 4,000m² of 3,000 gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] </td> </tr> </table>	Paynes Park	Mixed-use	<ul style="list-style-type: none"> Redevelopment to provide approximately 4,000m² of 3,000 gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] 		As above	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.		
Paynes Park	Mixed-use										
<ul style="list-style-type: none"> Redevelopment to provide approximately 4,000m² of 3,000 gross sq.m of additional main shop, café, restaurant, pub, drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] 											
		HOLWELL									
MM 265 / FM 133	169	Paragraph 13.151	There are no sites allocated for residential development in Holwell. 10 30 homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
		ICKLEFORD									
FM 134	169	Paragraph 13.154	The civil parish extends north to the District and county boundary with neighbouring Central Bedfordshire. This Plan allocates land for development along the administrative boundary. This site The area at the north of Ickleford parish is considered under a specific section of this chapter on Lower Stondon. This is the settlement within Central Bedfordshire that the site will immediately adjoins North Hertfordshire.	For effectiveness consequential to FM158 [Lower Stondon]	None – descriptive update						
MM 266 / FM 135	169	Paragraph 13.155	Ickleford is identified as a Category A one of five villages where a greater amount of development has been allocated. The development boundary of Ickleford is shown on the Proposals Policies Map to indicate the area within which further development will be allowed. Most of the rest of the parish is classed as Green Belt, save a small area in the far north of the parish on the Bedfordshire border which is Rural Area Beyond the Green Belt.	For effectiveness following Matter 26 hearing	None – descriptive update						
MM 267 /	169	Paragraph 13.157	Three sites are allocated around the edge of Ickleford village for an estimated 199 new homes. 10 36 further new homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site						

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings				
FM 136					allocations and / or homes completed or permitted				
MM 271 / FM 137	170	Table after Policy IC3	<table border="1"> <tr> <td>Completions and permissions</td> <td>10 36 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>209 235 homes</td> </tr> </table>	Completions and permissions	10 36 homes	Total allocated, completed and permitted	209 235 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Completions and permissions	10 36 homes								
Total allocated, completed and permitted	209 235 homes								
KELSHALL									
MM 278 / FM 138	172	Paragraph 13.168	No sites are allocated in Kelshall for residential development. One Four new homes has have been built or granted planning permission in the parish since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
KIMPTON									
FM 139		Paragraph 13.173	One site is allocated in Kimpton for an estimated 13 new homes. 32 43 homes have been built or granted permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
FM 140		Table after Policy KM3	<table border="1"> <tr> <td>Completions and permissions</td> <td>32 43 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>45 56 homes</td> </tr> </table>	Completions and permissions	32 43 homes	Total allocated, completed and permitted	45 56 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Completions and permissions	32 43 homes								
Total allocated, completed and permitted	45 56 homes								
KING'S WALDEN									
FM 141		Paragraph 13.179	One site is allocated in King's Walden parish, at Breachwood Green, for an estimated 16 new homes. One additional new 11 homes have been built or granted permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
FM 142		Table after Policy KW1	<table border="1"> <tr> <td>Completions and permissions</td> <td>1 11 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>17 27 homes</td> </tr> </table>	Completions and permissions	1 11 homes	Total allocated, completed and permitted	17 27 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Completions and permissions	1 11 homes								
Total allocated, completed and permitted	17 27 homes								
KNEBWORTH									
MM 283 / FM 143	176	Paragraph 13.185	Knebworth is identified as a Category A one of five villages where a greater amount of development has been allocated . It is excluded from the Green Belt with a settlement boundary shown on the Proposals Policies Map . General development will be permitted in this area. The rest of the parish is designated Green Belt. Old Knebworth is identified as a Category B village within the Green Belt where limited infilling will be allowed.	For effectiveness following Matter 26 hearing session	None – descriptive update				
MM 284 / FM 144	176	Paragraph 13.188	This Plan identifies four three local housing allocations within Knebworth for an estimated 598 584 new homes. A further 65 175 homes have already been built or granted planning permission within the parish. This includes development adjoining the southern edge of Stevenage Borough.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
MM 286 / FM 145	177	Policy KB2 (4 th bullet)	<table border="1"> <tr> <td>Land off Gypsy Gipsy Lane</td> <td>184 homes</td> </tr> </table> <ul style="list-style-type: none"> • Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures; • Sensitive design and / or lower density housing where site affects setting of Stockens Green Conservation Area; • Creation of appropriate, defensible Green Belt boundary along southern perimeter of site; • Approximately two hectares of land to the south of Gipsy Lane and adjoining the existing settlement reserved as an appropriate site for provision of 1FE a new Primary School • Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; 	Land off Gypsy Gipsy Lane	184 homes	For effectiveness and in response to the Inspector's August 2019 letter (Paragraph 9) and to correct spelling of road name	None - Within Rye Meads STW catchment but does not result in change to quantum of development or operation of Policy NE10		
Land off Gypsy Gipsy Lane	184 homes								

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings								
			<ul style="list-style-type: none"> Address existing surface water flood risk issues, including any run-off from A1(M), through SUDs or other appropriate solution; Transport assessment (or equivalent) to demonstrate highway impacts, including construction traffic, will not significantly affect Deards End Lane railway bridge (Scheduled Ancient Monument); Appropriate noise mitigation measures, to potentially include buffer strip, insulation and appropriate orientation of living spaces; and Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery. 										
FM 146	177	Policy KB3 (delete)	<p>Chas Lowe site, London Road 14 homes</p> <ul style="list-style-type: none"> Address existing surface water flood risk issues through removal of hardstanding, SUDs or other appropriate solution. 	For effectiveness – development has commenced or been completed -as supported by document ED191B	None - This modification results in the proposed deletion from the Plan of an allocation that was previously screened into the HRA but does not impact upon the overall HRA findings.								
MM 293 / FM 147	178	Paragraph 13.193	<p>New development, particularly on site KB4 to the east of Knebworth, provides the opportunity to look at alternate approaches. Making smaller-scale secondary provision, possibly as an ‘all-through school’¹⁴⁴ may be an appropriate solution which meets future needs, benefits existing residents and provides a more sustainable approach.</p> <p>¹⁴⁴All-through schools make provision for all children from age 4 to 18. See Policy SP10.</p>	The Council considers this further change to be non-material but is included here as amends a previous MM in response to Inspector’s August 2019 letter (Paragraph 7)	None – descriptive update								
MM 289 / FM 148	178	Table after Policy KB4	<table border="1"> <tr> <td>Completions and permissions</td> <td>65 175 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>663 759 homes</td> </tr> </table>	Completions and permissions	65 175 homes	Total allocated, completed and permitted	663 759 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
Completions and permissions	65 175 homes												
Total allocated, completed and permitted	663 759 homes												
		LETCHWORTH GARDEN CITY											
MM 299 / FM 149	182	Paragraph 13.215	<p>Fourteen Twelve sites are allocated in Letchworth for an estimated 1,546 1,485 additional dwellings. A further 594 693 homes have been built or granted planning permission since 2011 and the town will see more than 2,000 new homes built over the plan period.</p>	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted								
FM 150	185	Policy LG14 (delete)	<p>Site at Icknield Way 8 homes</p> <ul style="list-style-type: none"> Sensitive design and / or lower density housing where site affects the setting of the Letchworth Conservation Area; 	For effectiveness – development has commenced or been completed -as supported by document ED191B	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment								
FM 151	185	Policy LG17 (delete)	<p>Hamonte 30 homes</p> <p>No site specific requirements identified.</p>	For effectiveness – development has commenced or been completed -as supported by document ED191B	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment								
MM 305 / FM 152	185	Table after Policy LG10	<table border="1"> <tr> <td>Total allocated sites</td> <td>1,523 1,485 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>594 693 homes</td> </tr> <tr> <td>Broad location – Letchworth Garden City town centre</td> <td>50 homes</td> </tr> <tr> <td>Total allocated, completed and permitted 2011-2031*</td> <td>2,167 1,928 homes</td> </tr> </table> <p>* Land North of Letchworth is allocated for 900 homes in total with 600 of these anticipated to be completed by 2031. The higher number is used in the total allocated sites. The lower number is used in the total allocated, completed and permitted 2011-2031.</p>	Total allocated sites	1,523 1,485 homes	Completions and permissions	594 693 homes	Broad location – Letchworth Garden City town centre	50 homes	Total allocated, completed and permitted 2011-2031*	2,167 1,928 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	1,523 1,485 homes												
Completions and permissions	594 693 homes												
Broad location – Letchworth Garden City town centre	50 homes												
Total allocated, completed and permitted 2011-2031*	2,167 1,928 homes												

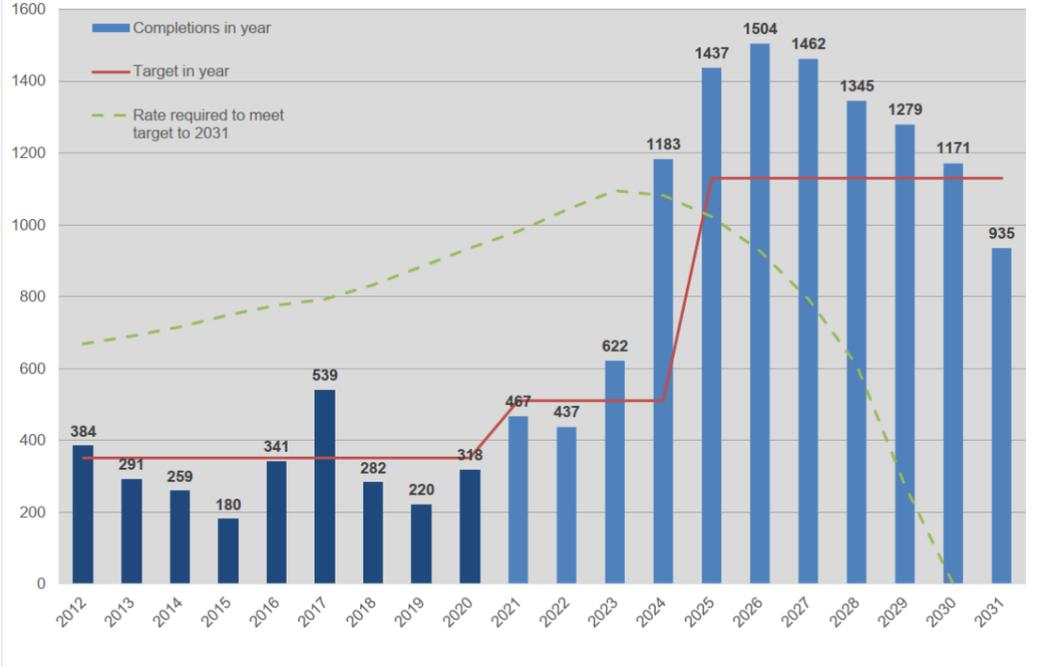
Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
MM 310 / FM 153	186	Policy LG19	<p>The Wynd, Openshaw Way Mixed-use</p> <ul style="list-style-type: none"> Redevelopment to provide approximately 4,500 of gross sq.m of additional main shop, café or restaurant, pub or drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] 	For legal compliance in response to the Use Class Order changes following the Matter 29 hearing as supported by the statement to that session and documents including ED203 and ED214	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.						
MM 311 / FM 154	186	Policy LG20	<p>Gernon Road Mixed-use</p> <ul style="list-style-type: none"> Redevelopment to provide approximately 1,000 of gross sq.m of additional main shop, café or restaurant, pub or drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] 	As above	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.						
MM 312 / FM 155	187	Policy LG21	<p>Arena Parade Mixed-use</p> <ul style="list-style-type: none"> Redevelopment to provide approximately 5,000 of gross sq.m of additional main shop, café or restaurant, pub or drinking establishment or takeaway town centre uses floorspace at ground floor level, subject to an up-to date assessment of retail capacity and supply. [remainder of policy unaffected] 	As above	None – policy previously screened out as outside Rye Meads STW catchment and this has not changed.						
LILLEY											
MM 317 / FM 156	189	Paragraph 13.236	No sites are allocated in Lilley for residential development. One new home has Nine new homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
LOWER STONDON											
FM 157	190	Paragraph 13.242	One new site is located Planning permission has been granted for 144 homes adjoining Lower Stondon. Four further new homes have been completed adjacent to the this site since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
FM 158	190	Policy LS1 (delete)	<p>Land at Bedford Road 120 homes</p> <ul style="list-style-type: none"> Appropriate junction access arrangements to Bedford Road; Sensitive integration into existing settlement, particularly in terms of design, building orientation and opportunities for cycle and pedestrian access; Sensitive incorporation of Footpaths Ickleford 001 & 002 as green routes through and around the edge of the site; No residential development within Flood Zones 2 or 3; Incorporate ordinary watercourses (and any appropriate measures) and address existing surface water flood risk issues within comprehensive green infrastructure and / or SUDs approach; Development proposals to be informed by site-specific landscape and heritage assessment; <table border="1"> <tr> <td>Total allocated sites</td> <td>120 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>4 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>124 homes</td> </tr> </table>	Total allocated sites	120 homes	Completions and permissions	4 homes	Total allocated, completed and permitted	124 homes	For effectiveness – development has commenced or been completed -as supported by document ED191B	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment
Total allocated sites	120 homes										
Completions and permissions	4 homes										
Total allocated, completed and permitted	124 homes										
FM 159	191	Paragraphs 13.243 to 13.246 (delete)	<p>Infrastructure and mitigation</p> <p>13.243 Our transport modelling work does not identify any specific mitigation works that are required in this area. Development here will, however, contribute toward traffic generation within Hitchin and appropriate contributions will be sought towards schemes in the town.</p> <p>13.244 Site LS1 will require the creation of a new access onto the A600 Bedford Road. The most appropriate solution, along with any consequential works – such as changes to speed limits entering / exiting the village from / to the north – will be explored through transport assessments.</p> <p>13.245 The nearest school within Hertfordshire is Ickleford Primary. Our approach to education here is set out in the Ickleford section of this chapter. However, development of this site will tie in to the urban area of Lower Stondon and parents may express a preference for their children to go to school within the village.</p>	For effectiveness consequential to FM 158 [deletion of LS1]	None – deletion of supporting text consequential to deletion of relevant site policy						

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
			13.246 On this and all other relevant matters it will be necessary to consider how the proposed development interacts with land and facilities in the administrative area of Central Bedfordshire Council.								
		NEWNHAM									
FM 160	192	13.252	No sites are allocated in Newnham for residential development. No Three new homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
		OFFLEY									
MM 323 / FM 161	194	Paragraph 13.262	No sites are allocated in Offley. Since 2011, 73 84 new homes have been built or granted planning permission in the Offley ward of the parish.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
		PIRTON									
MM 326 / FM 162	195	Paragraph 13.267	No sites are allocated in Pirton by this Plan. Around 94 139 homes have been built or granted planning permission since 2011 ⁴⁴⁷ . ⁴⁴⁷ Outline planning permission has been granted for up to 82 new homes at Holwell Turn. The precise number of homes to be built will be determined by a detailed, ‘reserved matters’ application. An estimate of 70 homes has been used for the purposes of calculating overall housing numbers in this Plan. This figure is without prejudice to the determination of any future planning applications on this site.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
		PRESTON									
FM 163	196	Paragraph 13.272	One site is allocated in Preston for an estimated 21 new homes. A further 17 29 homes have been built or granted permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
FM 164	196	Table after Policy PR1	<table border="1"> <tr> <td>Completions and permissions</td> <td>17 29 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>38 50 homes</td> </tr> </table>	Completions and permissions	17 29 homes	Total allocated, completed and permitted	38 50 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted		
Completions and permissions	17 29 homes										
Total allocated, completed and permitted	38 50 homes										
		REED									
MM 331 / FM 165	198	Paragraph 13.281	One site is allocated in Reed for an estimated 22 new homes. A further 12 14 new homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
MM 332 / FM 166	198	Table after Policy RD1	<table border="1"> <tr> <td>Total allocated sites</td> <td>22 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>12 14 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>34 36 homes</td> </tr> </table>	Total allocated sites	22 homes	Completions and permissions	12 14 homes	Total allocated, completed and permitted	34 36 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	22 homes										
Completions and permissions	12 14 homes										
Total allocated, completed and permitted	34 36 homes										
		ROYSTON									
MM 334 / FM 167	200	Paragraph 13.289	Eight Four Four sites are allocated in Royston providing a total of more than 1,000 for almost 500 new homes. 663 1,421 further homes have been built or granted planning permission since 2011. This includes two large sites of around 300 homes each at the eastern and western edges of the town.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
FM 168	200	Policy RY1 (delete)	<table border="1"> <tr> <td>Land west of Ivy Farm, Baldock Road</td> <td>279 homes</td> </tr> </table>	Land west of Ivy Farm, Baldock Road	279 homes	For effectiveness – development has commenced or been completed -as supported by document ED191B	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment				
Land west of Ivy Farm, Baldock Road	279 homes										

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
			<ul style="list-style-type: none"> Appropriate solution for primary education requirements having regard to up-to-date assessments of need and geographical distribution of existing provision; Retention of Public Right of Way Royston 017 as a green corridor through the site; Appropriate mitigation measures for noise associated with the adjoining railway to potentially include insulation and appropriate orientation of living spaces; Design to minimise visual impact of the development from Therfield Heath; Proposals to be informed by a site-specific landscape assessment and to retain trees as a buffer to the railway line; Consider and mitigate against potential adverse impacts upon Therfield Heath SSSI including provision of green infrastructure within the development to reduce recreational pressure; Address potential surface water flood risk through SUDs or other appropriate solution; Archaeological survey to be completed prior to development. Sensitive design and mitigation measures to address any impact on the setting of the Scheduled Ancient Monuments (pre-historic barrows). 								
FM 169	200	Policy RY2 (delete)	<p>Land north of Newmarket Road 330 homes</p> <ul style="list-style-type: none"> New vehicular access from the A505; Appropriate solution for education requirements arising from sites RY2 and RY10 having regard to up-to-date assessments of need; Design to minimise visual and landscape impact, including development limits below the 70 metre contours; Undertake an ecological survey (including reptiles) due to adjacent habitats and provide mitigation and/or off-setting measures as necessary. Developer to ensure management of the chalk grassland; Protect and enhance hedgerows and trees where possible. Retain roadside trees and tree clump along the A505 and Newmarket Road; Address potential surface water flood risk through SUDs or other appropriate solution; Additional wastewater treatment capacity to be provided prior to commencement of development; Archaeological survey to be completed prior to development. 	For effectiveness – development has commenced or been completed -as supported by document ED191B	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment						
FM 170	202	Policy RY8 (delete)	<p>Land at Lumen Road 14 homes</p> <ul style="list-style-type: none"> Ensure appropriate residential amenity having regard to adjoining employment uses Design and layout to take account of foul pumping station within proximity to the site ensuring a buffer of 15m from the boundary of proposed occupied buildings; Address potential surface water flood risk through SUDs or other appropriate solution; Site layout designed to take account of existing wastewater infrastructure; Phasing of development to link with Sewage Treatment Works improvements; Preliminary Risk Assessment to identify any contamination associated with previous uses including mitigation; Sensitive design and / or lower density housing where the site affects the setting of the Grade II Listed 21 Mill Road. 	For effectiveness – development has commenced or been completed -as supported by document ED191B	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment						
MM 342 / FM 171	202	Table after Policy RY11	<table border="1"> <tr> <td>Total allocated sites</td> <td>1,049 478 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>663 1,421 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>1,712 1,899 homes</td> </tr> </table>	Total allocated sites	1,049 478 homes	Completions and permissions	663 1,421 homes	Total allocated, completed and permitted	1,712 1,899 homes	Positively prepared ; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	1,049 478 homes										
Completions and permissions	663 1,421 homes										
Total allocated, completed and permitted	1,712 1,899 homes										
FM 172		Paragraph 13.297 (delete)	The potential impacts of site RY1 on the SSSI and heritage assets and Therfield Heath is one of the key consideration. Our overall evidence base concludes that, in order to meet our housing requirements over the plan period, it will be necessary to allocate some sites which may impact upon heritage assets and landscape. Our aim will be to ensure that the overall integrity of relevant heritage assets are protected and that the development is designed to minimise impact on the landscape.	For effectiveness consequential to FM168 [Delete RY1]	None – deletion of supporting text consequential to deletion of relevant site policy						
FM 173		Paragraph 13.300	A further Land for a new 2FE first school has been secured within the new development currently being built will be required over the plan period. This is the County Council's preferred school size and would normally require the provision of one new site. However, the majority of new development in Royston will be around the	For effectiveness consequential to FM168 [Delete RY1]	None – modification of supporting text consequential to deletion						

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings										
			peripheries of the existing town. It may be more appropriate for the provision of two separate, smaller schools to the east and west of the town respectively to best accommodate future patterns of demand and increase the sustainability of new developments in these locations.		of relevant site policy										
		RUSHDEN													
MM 347 / FM 174	205	Paragraph 13.307	There are no sites allocated for residential development in Rushden. Two Six new homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted										
		SANDON													
MM 349 / FM 175		Paragraph 13.312	There are no sites allocated for residential development in Sandon. 13 17 new homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted										
		ST IPPOLYTS													
MM 351 / FM 176	207	Paragraph 13.319	Two sites are allocated in St Ippolyts & Gosmore for an estimated 52 new homes. A further 34 55 homes have been built or granted planning permission in the parish since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted										
FM 177		Table after Policy SI2	<table border="1"> <tr> <td>Completions and permissions</td> <td>34 55 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>86 107 homes</td> </tr> </table>	Completions and permissions	34 55 homes	Total allocated, completed and permitted	86 107 homes		None – factual update as to the numbers of site allocations and / or homes completed or permitted						
Completions and permissions	34 55 homes														
Total allocated, completed and permitted	86 107 homes														
		ST PAULS WALDEN													
FM 178	209	Paragraph 13.326	One No sites is are allocated for residential development in St Paul's Walden at Whitwell for an estimated 41 new homes. A further nine 54 homes have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted										
MM 356 / FM 179	209	Policy SP2 (delete)	<table border="1"> <tr> <td>Land between Horn Hill and Bendish Lane, Whitwell</td> <td>41 41 homes</td> </tr> <tr> <td colspan="2"> <ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery. Address existing surface water flood risk issues through SUDs or other appropriate solution; Integration of Byway Open to All Traffic St Paul's Walden 036 as a green corridor through the site and boundary feature; Sensitive design approach, particularly towards north-east of site to minimise impacts on adjoining Conservation Area. </td> </tr> <tr> <td>Total allocated sites</td> <td>41 41 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>9 9 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>50 50 homes</td> </tr> </table>	Land between Horn Hill and Bendish Lane, Whitwell	41 41 homes	<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery. Address existing surface water flood risk issues through SUDs or other appropriate solution; Integration of Byway Open to All Traffic St Paul's Walden 036 as a green corridor through the site and boundary feature; Sensitive design approach, particularly towards north-east of site to minimise impacts on adjoining Conservation Area. 		Total allocated sites	41 41 homes	Completions and permissions	9 9 homes	Total allocated, completed and permitted	50 50 homes	For effectiveness – development has commenced or been completed -as supported by document ED191B	None – modifications result in proposed deletion of policy previously screened out as outside Rye Meads STW catchment
Land between Horn Hill and Bendish Lane, Whitwell	41 41 homes														
<ul style="list-style-type: none"> Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery. Address existing surface water flood risk issues through SUDs or other appropriate solution; Integration of Byway Open to All Traffic St Paul's Walden 036 as a green corridor through the site and boundary feature; Sensitive design approach, particularly towards north-east of site to minimise impacts on adjoining Conservation Area. 															
Total allocated sites	41 41 homes														
Completions and permissions	9 9 homes														
Total allocated, completed and permitted	50 50 homes														
		THERFIELD													
MM 358 / FM 180	210	Paragraph 13.331	One site is allocated in Therfield for an estimated 12 new homes. 10 24 further homes have been either built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted										
MM 360 / FM 181	210	Table after Policy TH1	<table border="1"> <tr> <td>Total allocated sites</td> <td>12 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>10 24 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>22 36 homes</td> </tr> </table>	Total allocated sites	12 homes	Completions and permissions	10 24 homes	Total allocated, completed and permitted	22 36 homes	Positively prepared; Factual update	None – factual update as to the numbers of site allocations and / or homes completed or permitted				
Total allocated sites	12 homes														
Completions and permissions	10 24 homes														
Total allocated, completed and permitted	22 36 homes														
		WALLINGTON													
FM 182		Paragraph 13.336	There are no sites allocated for residential development in Wallington. One Two new homes has have been built or granted planning permission since 2011.	Positively prepared; Factual update	None – factual update as to the numbers of site										

Ref.	Page (LP1)	Policy / Paragraph	Modification	Reason / source for Further Modification	Implications for HRA findings						
					allocations and / or homes completed or permitted						
		WYMONDLEY									
MM 365 / FM 183	213	Paragraph 13.348	Little Wymondley is classed a Category A one of five villages where a greater amount of development has been allocated , with a The settlement boundary is shown on the Proposals Policies Map within which additional development will be allowed.	For effectiveness following Matter 26 hearing session	None – descriptive update of village status						
MM 366 / FM 184	213	Paragraph 13.352	One site is allocated in Wymondley for an estimated 300 additional homes. 15 31 further homes have been built or granted planning permission in the parish since 2011.	Positively prepared ; Updated housing monitoring information	None – factual update as to the numbers of site allocations and / or homes completed or permitted						
MM 368 / FM 185	214	Table after Policy WY1	<table border="1"> <tr> <td>Total allocated sites</td> <td>300 homes</td> </tr> <tr> <td>Completions and permissions</td> <td>16 31 homes</td> </tr> <tr> <td>Total allocated, completed and permitted</td> <td>316 331 homes</td> </tr> </table>	Total allocated sites	300 homes	Completions and permissions	16 31 homes	Total allocated, completed and permitted	316 331 homes	Positively prepared ; Updated housing monitoring information	None – factual update as to the numbers of site allocations and / or homes completed or permitted
Total allocated sites	300 homes										
Completions and permissions	16 31 homes										
Total allocated, completed and permitted	316 331 homes										
FM 186	221	After 14.29 (Table 2)	<table border="1"> <tr> <td>SP4</td> <td>% of primary frontages in A1 retail use</td> <td>For at least 66% of units and floorspace within the primary frontage to remain in A1 retail use</td> </tr> </table>	SP4	% of primary frontages in A1 retail use	For at least 66% of units and floorspace within the primary frontage to remain in A1 retail use	For legal compliance following the Use Class Order amendments.	None – monitoring target which does not relate to HRA considerations			
SP4	% of primary frontages in A1 retail use	For at least 66% of units and floorspace within the primary frontage to remain in A1 retail use									
MM 372 / FM 187	222	New Policy IMR1	<p>Policy IMR1 Five Year Housing Land Supply</p> <p>In order to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing, we will:</p> <ol style="list-style-type: none"> Deliver the total housing requirement of 13,000 net dwellings over the plan period on a stepped basis. The Council's five year housing land supply will be measured against housing requirement targets of: <ul style="list-style-type: none"> 350 dwellings per annum for the plan period from 2011 to 31 March 2020; 500 dwellings per annum for the plan period from 1 April 2020 to 31 March 2024; and 1,120 dwellings per annum for the remainder of the plan period from 1 April 2024 to 2031; Add any shortfall in housing delivery since the plan's start date, spread evenly over the remaining plan period, to the calculation of the requirement; Ensure that the supply of specific, deliverable sites includes a buffer (moved forward from later in the plan period) in line with national planning policy; and Monitor housing completions and permissions on an ongoing basis to ensure the housing trajectory is based upon robust and up-to-date information and assumptions. 	To ensure the plan is positively prepared, justified, effective and consistent with national policy following the Matter 21 to 26 hearings as supported by the statements to those sessions and documents including ED172, ED191A and ED191B	None – This policy sets out the approach to monitoring the implementation of the overall quantum and distribution of development. However, the modified requirements are lower than considered in the HRA and also reflect changes in completions and permissions and the phasing of development beyond 2031 rather than any new allocations (of which there are none). Any site-specific implications considered against relevant policies.						
MM 373 / FM 188	222	After proposed new Policy IMR1 (new paragraphs)	<p>Figure 6 over-page shows the anticipated housing trajectory. This will be kept up-to-date in future monitoring reports. This programme of delivery will allow the plan to demonstrate a five-year land supply at the point of adoption and, subsequently, on an on-going basis.</p> <p>In order to achieve this, the plan uses a stepped approach to the housing requirement. For the period to 1 April 2020, a housing requirement of 350 dwellings per annum is applied recognising that the quantum of development delivered from the start of the plan period in 2011 to this date is fixed. This increases to 500 dwellings per year between 2020 and 2024 before rising to a requirement for 1,120 dwellings per annum over the remaining years of the plan period.</p> <p>This approach is linked to development strategy set out in this plan. A significant proportion of future new homes will be delivered upon new strategic sites. Delivery of these sites requires their release from the Green Belt which is achieved through this plan. However, this means that in the first half of the plan period from 2011</p>	As above	None – amends supporting text to reflect modifications to Policy IMR1 assessed above						

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			<p>to 2021, reliance has been placed upon sites permitted under the previous policy regime and extant planning permissions.</p> <p>In the second half of the plan period from 2021, the Local Housing Allocations released from the Green Belt will be critical to maintaining the delivery profile and a rolling five-year land supply. It is anticipated that the Strategic Housing Sites will become the main component of new housing supply in the latter years of the plan. The stepped approach to housing delivery over the plan period allows a better match with actual and anticipated delivery.</p> <p>The same circumstances support a measured approach to meeting the shortfalls in housing delivery that have occurred since 2011. To this end the plan does not seek to meet the full extent of any backlog of delivery within the first five years (known as the <i>Sedgefield</i> approach) but rather seeks to meet this backlog over the remainder of the plan period (the <i>Liverpool</i> approach).</p> <p>In addition to the measures above, national policy requires a buffer, moved forward from later in the plan period, to be applied to the calculation of the five year supply*. This buffer should be a minimum of 5% but, where there has been a record of persistent under delivery of housing, this should be increased to 20%.</p> <p>In the period from the start of the plan period on 1st April 2011 to 31st March 2020 the delivery of housing completions in the District were well below the 650 dwellings per annum that would be necessary if the requirement were to be met evenly over the whole plan period, averaging 313 dwellings per annum. This necessitates the application of a 20% buffer at the point of the plan's adoption.</p> <p>The buffer requirement will be added to both the housing requirement and any backlog in delivery to be met over the five year period under assessment.</p> <p>These approaches are set out in Policy IMR1 and will be the basis of the housing land supply calculations that are produced for monitoring purposes over the plan period. The delivery of sites will be monitored and will inform the plan review set out in Policy IMR2.</p> <p>* Paragraph 47 of the NPPF</p>																																																																																						
MM 374 / FM 189	223	Figure 6 (replace with housing trajectory as shown in ED191B)	 <table border="1"> <caption>Data for Figure 6: Housing Trajectory</caption> <thead> <tr> <th>Year</th> <th>Completions in year</th> <th>Target in year</th> <th>Rate required to meet target to 2031</th> </tr> </thead> <tbody> <tr><td>2012</td><td>384</td><td>350</td><td>680</td></tr> <tr><td>2013</td><td>291</td><td>350</td><td>700</td></tr> <tr><td>2014</td><td>259</td><td>350</td><td>720</td></tr> <tr><td>2015</td><td>180</td><td>350</td><td>740</td></tr> <tr><td>2016</td><td>341</td><td>350</td><td>760</td></tr> <tr><td>2017</td><td>539</td><td>350</td><td>780</td></tr> <tr><td>2018</td><td>282</td><td>350</td><td>800</td></tr> <tr><td>2019</td><td>220</td><td>350</td><td>820</td></tr> <tr><td>2020</td><td>318</td><td>350</td><td>840</td></tr> <tr><td>2021</td><td>467</td><td>350</td><td>860</td></tr> <tr><td>2022</td><td>437</td><td>350</td><td>880</td></tr> <tr><td>2023</td><td>622</td><td>350</td><td>900</td></tr> <tr><td>2024</td><td>1183</td><td>350</td><td>920</td></tr> <tr><td>2025</td><td>1437</td><td>350</td><td>940</td></tr> <tr><td>2026</td><td>1504</td><td>350</td><td>960</td></tr> <tr><td>2027</td><td>1462</td><td>350</td><td>980</td></tr> <tr><td>2028</td><td>1345</td><td>350</td><td>1000</td></tr> <tr><td>2029</td><td>1279</td><td>350</td><td>1020</td></tr> <tr><td>2030</td><td>1171</td><td>350</td><td>1040</td></tr> <tr><td>2031</td><td>935</td><td>350</td><td>1060</td></tr> </tbody> </table>	Year	Completions in year	Target in year	Rate required to meet target to 2031	2012	384	350	680	2013	291	350	700	2014	259	350	720	2015	180	350	740	2016	341	350	760	2017	539	350	780	2018	282	350	800	2019	220	350	820	2020	318	350	840	2021	467	350	860	2022	437	350	880	2023	622	350	900	2024	1183	350	920	2025	1437	350	940	2026	1504	350	960	2027	1462	350	980	2028	1345	350	1000	2029	1279	350	1020	2030	1171	350	1040	2031	935	350	1060	As above	None – reflects outcomes of amendments to Policies SP2, SP8, IMR1 and site-specific allocations which are assessed above
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FM 190	222	Before Paragraph 14.30	<p>Policy IMR2: Local plan early review</p> <p>The Council will undertake a whole plan review of the Local Plan 2011-2031 by the end of 2023 at the latest. This will determine whether this Plan needs to be updated either in whole or in part. All policies will be reviewed but with particular regard paid to the following matters that were specifically identified during the preparation and examination of this plan:</p> <ul style="list-style-type: none"> • Housing requirements for the District and wider housing market areas; • Housing delivery having regard to the progress and implementation of the Strategic Housing Sites and Local Housing Allocations identified in this plan and the rates of development being achieved measured against the stepped approach and housing trajectory set out in this plan; • The safeguarded land to the West of Stevenage; • The outcomes of the process(es) to comprehensively explore new settlement options in the District; • Gypsy and Traveller provision • The identification of needs for retail, leisure, office and other main town centre uses; • Options for long-term secondary education provision in the Stevenage area; and • Broad alignment with the statutory five-year time limit for reviews of the East Hertfordshire and Stevenage local plans (required by November 2023 and May 2024 respectively) to allow co-ordinated consideration of the above matters. <p>The review will have regard to up-to-date information and be conducted in line with Government policy and statutory requirements. Subject to the outcomes of that review, a new plan or policies will be prepared to a new time horizon of at least 2041.</p> <p>The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result in the preparation of a joint plan or policies based upon wider functional geographies.</p>	To ensure the Plan is positively prepared and effective following the Matter 22 hearings and as supported by documents including ED176, ED178 and ED191B	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production
FM 191	222	Paragraph 14.30	<p>The Government expects plans to be regularly reviewed, preferably every five years¹⁵⁵ and we will need to update our Local Plan more regularly than has happened in the past. National guidance recognises that plans can be reviewed in whole or in part to respond flexibly to changing circumstances¹⁵⁶. We will use the monitoring framework, set out above, to keep the effects of this Plan under review.</p> <p>Footnote ¹⁵⁵ As set out in the Government's Technical consultation on implementation of planning changes (DCLG, 2016) Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</p>	For effectiveness in response to Inspector's August 2019 letter (Paragraph 25)	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production
FM 192	224	Paragraph 14.32	<p>In addition to our monitoring, we recognise that other events may trigger a future review of the Plan. local plans should normally set out where development will occur over a 15-year period from the point of adoption¹⁵⁷. This Plan shows how we will meet our needs over the period to 2031, 13 10 years from the anticipated date of adoption.</p>	For effectiveness and in response to the Inspector's August 2019 letter (Paragraph 10)	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production
FM 193	224	Paragraph 14.33	<p>We already recognise that further work is required to ensure we meet our needs in full in the period beyond 2026. However, we believe that, due to the progress already made on these issues, the approach set out in this Plan is the most appropriate one for North Hertfordshire. Policy IMR2 therefore commits to an early, whole plan review to commence by the end of 2023 that will allow the Council to consider longer-term requirements, including in relation to a number of specific issues identified through the production of this plan.</p>	To ensure the Plan is positively prepared and effective following the Matter 22 hearings and as supported by documents including ED176, ED178 and ED191B	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production
FM 194	224	Paragraph 14.36	<p>At the same time, future decisions by other bodies may significantly influence future options for growth in North Hertfordshire. We will continue to work with central government, the Hertfordshire Growth Board and other relevant agencies to better understand the likely nature of these potential projects¹⁵⁸.</p>	To ensure the Plan is positively prepared and effective following the Matter 22 hearings and as	None – sets out approach to review of the Plan which will be subject to relevant environmental

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				supported by documents including ED176, ED178 and ED191B	assessments at the time of its production
FM 195	224	Paragraph 14.37	We currently consider it most likely that The outcomes of these deliberations and the new settlement process will be reflected in a full the review of the Plan process outlined in Policy IMR2. We currently consider it most likely that this review will result in a need to comprehensively update the local plan, recognising that this cannot be prejudged at this time. Our present intention is that the next full any comprehensive review of this Plan will be completed by the mid-2020s at the latest. It will roll the Plan forward to a new time horizon of at least 2041 and deliver any specific additional land or updated policies and sites that we already recognise will be that are identified as being needed.	To ensure the Plan is positively prepared and effective following the Matter 22 hearings and as supported by documents including ED176, ED178 and ED191B	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production
FM 196	224	Paragraph 14.41	Beyond these defined events, there may be changes in circumstances that we cannot currently foresee, or are yet to understand the full implications of , but which have a substantial impact upon the District. This might be a major change to the way in which the planning system operates, as suggested in the Government’s 2020 White Paper , or the cancellation of a key project required to support growth structural changes to the population or the way we live, work or spend our leisure time in response to Brexit, Covid-19, climate change or any other future event. We will determine the most appropriate response as and when any such circumstances arrive. It is anticipated that the review process outlined in IMR2 will be the most appropriate means of considering these matters but the Council may also consider focussed reviews of individual or small groups of policies prior to this where necessary.	To ensure the Plan is positively prepared and effective following the Matter 22 hearings and as supported by documents including ED176, ED178 and ED191B	None – sets out approach to review of the Plan which will be subject to relevant environmental assessments at the time of its production