



Chris Carter
Assistant Director - Planning

Reply to: address as below

Date: 5 June 2023

Melvyn Middleton
Planning Inspectorate

c/o Programme Officer
louise@poservices.co.uk

By email only

Dear Sir

**Welwyn Hatfield Local Plan Examination Main Modifications
Questions arising from Main Modifications consultation**

I am writing in response to your letter dated 23 May in which you highlight a number of points raised by representors to the main modification consultation, which the Council facilitated earlier in the year, and to which you have sought a response to assist in your consideration. Before responding to the points raised, I would like to take the opportunity to set out the Council's position in terms of stages to the final report and adoption. I hope the following is helpful.

The decision of the Council in December, which preceded the Main Modification consultation in January/February, referenced a strategy and set of Main Modifications. Should further changes to the plan be considered necessary to make the plan sound, and should these changes require consultation led by the Council, a decision to consult on these changes will be required by Council. This will need to proceed, as before, to Cabinet Parking and Planning Panel (CPPP), Cabinet and Council. To adhere to the timetable as set out in the Local Development Scheme (LDS) a series of special meetings will be required. As has been the case before, the special meetings could be arranged but do require adherence to the statutory duties relating to the notification of a special meeting of the Council and would present a challenging timetable.

A requirement to undertake further consultation, at this advanced stage, would necessitate consultation over the summer, something which the Council would normally seek to avoid. A public consultation in July/August is the earliest that could be reasonably achieved following a special meeting of Council, and the Council is concerned that this would risk the adoption of the plan before the end of September 2023.

Legislation enables Inspectors to amend the detailed wording of the main modifications and/or add consequential modifications where necessary at the reporting stage. This is our strong preference as it would allow the Council to move swiftly to a point at which it could consider adoption. It is our view that the scope of the identified further main modifications, which in many instances constitute responses to individual representors, could be required at the report

Welwyn Hatfield Borough Council, The Campus, Welwyn Garden City, Herts AL8 6AE
DX 30075, Welwyn Garden City 1

Tel: 01707 357000

www.welhat.gov.uk



stage negating the need to consult in July/August. In terms of the shortening of the plan's proposed review, the principle of the review was introduced and consulted upon as a main modification.

The remainder of the letter is structured as a response to the questions and for clarification has a series of sub headings.

MM2, Page 29, Spatial Vision

A Further Main Modification (FM1) is proposed that sets out the total need for Green Belt release during the plan period, to meet the housing requirement that cannot be provided for within the existing towns and villages. It is expressed as an overall amount, with the amount still to be allocated. FM1 also reinstates the original text relating to Strategic Objective 1 as the plan would provide sufficient housing land to meet the Borough's development needs to beyond 2032 negating the need for the modification.

MM3, Page 35, Policy SP 2, Targets for Growth SP 2 (first bullet point)

It is not considered necessary for there to be a comparative reduction in the amount of employment land and floorspace proposed in the first bullet point. The amount of employment floorspace which the plan makes provision for (55,000 sqm) is already below the identified need of 85,000 sqm. This is explained in more detail in MM20, paragraph 10.7. As the shortfall in employment floorspace over the plan period is already greater than the under provision in housing, a reduction would only result in greater under provision of employment floorspace.

Delivery timescales

The Council's anticipated delivery timescales and build rates have been informed by a combination of information and analysis including:

- Planning application status and progress towards submission of planning applications
- Site-specific factors and constraints
- Information from site promoters/developers on site availability / anticipated delivery timescales
- Analysis of historic delivery timescales and build rates in Welwyn Hatfield

The delivery timescales have been reviewed frequently throughout the Local Plan examination as new and updated information has become available. The 2016 and 2019 Housing and Economic Land Availability Assessment (HELAA) included an assessment of deliverability timescales for each site. Site specific information on constraints, e.g. land availability and infrastructure requirements, were used to make a broad assessment on when sites will be expected to deliver completions (years 1-5, years 6-10, years 11-15 or across timeframes).

To assist in forecasting delivery timescales and build out rates, in 2018 the Council carried out a piece of analysis which looked at the length of time that housing sites in Welwyn Hatfield have taken to complete in the past. The analysis included sites which had completed over the 15-year period between 2000 and 2015 and the timescales from the permission being received through to construction commencing, annual build out rates and final completion. For major planning applications, the average time between a planning application being received and construction commencing on site was around two years. The build out period and rates were

dependent on the size of the site. The Council has since continued to review the time taken for housing sites to complete as part of its Housing Delivery Test Action Plan.

In April & May 2022 the Council sent out a survey to site promoters/developers which included questions on timescales for site availability, evidence of progress towards the submission of a planning application, estimates for timing on the key stages of the planning, construction and delivery process and anticipated annual build rates.

In updating the delivery assumptions set out in the Housing note supporting document (subject to consultation alongside the Main Modifications) the Council looked at the planning status of each site as well as the information outlined above to arrive at its latest delivery timescales and build rate estimates. Where information received from the developer/landowner seemed overly ambitious in comparison to historical lead-in times experienced in the borough, or site-specific constraints, the Council pushed back delivery forecasts.

In terms of historic build rates in Welwyn Hatfield, the Hatfield Aerodrome site was the largest development site within Welwyn Hatfield over the last twenty years and delivered a total of 2,210 dwellings. The build was over 12 years, and while completions did slow/stop during the 2008/09 recession, the annual average rate of delivery was still 184 dwellings. The highest annual delivery rate recorded was 435 dwellings in 2003/04, and delivery rates often reached over 300 dwellings in a year (in fact, this was the case for five of the delivery years). Other examples of historic build rates at larger sites, include 3 separate sites in Welwyn Garden City which delivered between 300-600 dwellings in total and all averaged annual build rates of over 100 dwellings per annum. Meanwhile there were 6 sites of between 100-200 dwellings, which all averaged build rates of over 50 dpa. The one exception was the Frythe in Welwyn where the 200 dwellings delivered over a longer period of around 6 years (34 dpa average). This development was predominantly very high value properties, which would be expected to have lower market absorption.

The highest annual site level delivery forecasts are at two of the strategic sites North West Hatfield (Hat1) and Broadwater Road West SPD site (Pea02b). In terms of Broadwater Road, this is a high density flatted scheme and therefore high annual delivery rates would be expected as whole blocks complete at a time. Where rates of 200 have been forecast, this represents two blocks anticipated to come forward in a year, as has been the case in 2022/23 when 208 flats across two blocks were delivered. For North West Hatfield, this is the largest proposed allocation totaling 1,750 dwellings and peak annual delivery rates have been forecast at 200 in a single year – the overall annual average forecast at the site is 160 dpa over 11 years. Considering past delivery levels at the Hatfield Aerodrome site as well as other mid-sized sites in the borough, this rate is not seen as overly ambitious. The site is a greenfield site, which typically have faster delivery rates - the Lichfield 2020 “Start to Finish” study found that average build out for greenfield sites considered in the study was 34% faster than for brownfield sites.

Both the Lichfield study “Start to Finish” 2020 and Welwyn Hatfield’s own analysis show that there can be large variations in delivery timescales and build rates, which are affected by many different factors - including site specific and wider economic conditions. The forecast build-out rates are averages and delivery will most certainly be lower or higher in some years than estimated. Past delivery of housing in the borough indicates that whilst there can sometimes be delays in sites coming forward and prior to construction commencing, once delivery has begun build rates generally tend to be reasonably high and delays minimised - with developers having invested significant capital in a site they want to start seeing a return as quickly as possible.

The Council's analysis of past delivery within Welwyn Hatfield indicates relatively high annual build out rates. Welwyn Hatfield has seen significant under delivery of housing in recent years and therefore would expect a high market absorption rate and levels of delivery. A Further Main Modification (FM3) is proposed confirming the overall housing target will be phased over the plan period and sets out the rates for this.

A proposed Further Main Modification (FM2) is proposed to reflect the updated strategy towards the location of new development throughout the borough.

SP 2 (second bullet point)

A Further Main Modification (FM3) is proposed that sets out a requirement for a review to be completed and submitted for examination sooner than five years (MM3) and for penalties to be set out in case it is not. The identified requirement for an updated or replacement plan to be submitted for examination no later than three years after the date of adoption of the plan is informed by the housing trajectory.

SP 2 (third bullet point)

The methodology used to arrive at the required C2 bed-spaces assumes that growth in the number of people living in communal accommodation is entirely attributable to growth in the number of older people aged 75 and over (2017 SHMA, 5.36). The projected change in the Welwyn Hatfield population aged 75+ over the plan period 2016-36, was revised downwards to +3,637 persons, compared with +6,200 persons in the 2014-based projections. Therefore, the requirement has been updated to reflect this. (EX203A, Table 4.1).

Projected change in population aged 75+ over 2016-36 plan period	
2014-based projections	2018-based projections (alternative internal migration variant)
+6,200	+3,637

The proposed C2 bedspace target does not distinguish between residential homes and nursing homes. The Council has engaged with Hertfordshire County Council Growth and Infrastructure Unit throughout the preparation of the plan, most recently at the Main Modifications. It is observed that HCC has not responded on the MM. It is suggested that Policy SP2 also be rounded to 'a net increase of around 200 bed spaces' to maintain consistency. A Further Main Modification (FM3) has been prepared to reflect this.

MM4, Page 41, Policy SP 3, Settlement Strategy & Green Belt boundaries. Settlement Hierarchy

The LUC assessment (EX99) was to expand the coverage of the Stage 2 Green Belt assessment to identify the degree of harm to the Green Belt that may result from its release and therefore identify which areas are most essential to retain or could be considered for release (subject to the consideration of wider sustainability factors).

An objective of the assessment was to undertake a review of the washed over settlements to establish the extent to which they contribute to the openness of the Green Belt and whether there is potential to inset them. As stated in paragraph 1.2 of EX99 it is not the purpose of this study to identify potential sites of suitability for housing development; rather to present the evidence in relation to Green Belt issues for the Council to consider alongside wider sustainability and viability factors.

The LUC assessment concluded that the washed over settlements of Lemsford, Newgate Street, Stanborough, Essendon, Northaw, Bell Bar and Swanley Bar have potential to be inset into the Green Belt. As is clear from the Main Modifications (EX293), Bell Bar is not proposed to be removed from the Green Belt, this is consistent with the approach taken with the six other settlements identified in the LUC assessment. The Council does not consider it necessary for Bell Bar to be inset into the Green Belt and for changes to Policy SP3.

MM5, Page 46, Fig 6 (Key Diagram)

A Further Main Modification (FM5) is proposed that updates the Key Diagram (Fig 6) showing the notional extent of the Green Corridor, this reflects the Corridor as shown on Fig 8 Green Infrastructure (MM25).

MM8, Page 57, Policy SADM 4, Town Centre Frontages

A Further Main Modification (FM6) is proposed that changes the reference from Class A1 to Class E in the justification text. In respect of the effectiveness of the need in Policy SADM4 for 70% of the Primary Frontages within both Welwyn Garden City and Hatfield town centres to be Class E retail uses considered appropriate in town centres according to the NPPF, this was a response to the change in Use Classes which had removed A class and others, and replaced them with a much broader Class E.

Despite considerable overlap, the uses covered by Class E and the definition of “Main Town Centre Uses” in the NPPF are not identical. For example, Class E includes creches, day nurseries and day centres (Class E(f)) and light industrial and research and development uses (Class E(g)(ii) and Class E(g)(iii)). Equally, “Main Town Centre Uses” in the NPPF includes hotels and conference centres.

The policy seeks to ensure that appropriate uses within town centres form the majority of the key frontages in our town centres and that the centres retain their viability and vitality. Because of the broad nature of Class E it was considered appropriate to qualify the Use Class requirement with reference to the NPPF definition.

This will ensure that uses which fall within Class E which are more appropriately located away from the key frontages in our centres are directed elsewhere should a planning application be submitted.

In respect of the Permitted Development (PD) rights within Class E, whilst it might increase the challenge of ensuring that the most appropriate uses occupy the key locations within our town centres, it is no different to various other PD rights which enable certain changes, and which are set out at national rather than local level. Therefore, though the PD right may present a challenge in ensuring the most appropriate uses occupy the key frontages in our centres, the policy remains effective.

MM10, Page 66, SP7, Affordable Housing table

A Further Main Modification (FM7) is proposed that removes the reference to Symondshyde from the affordable housing table. The removal of new village was undertaken at the main modification stage and the reference removal at FM7 is reflecting this.

MM12, Page 67, Policy SP7, Self-build and Custom Housebuilding

A Further Main Modification (FM8) is proposed that removes the ambiguity around the level of provision of self-build and custom housingbuilding required.

FM8 also proposes removing the requirement for self-build and custom housebuilding plots with no realistic demand being offered to the Council then a Registered Housing Provider for affordable housing before release to the open market. The evidence currently held in the evidence base for the Emerging Local Plan does not justify this. A Further Main Modification (FM8) is proposed to clarify that self-build will be required on schemes of non-flatted dwellings.

The policy, as modified, required sites of 100 or more non-flatted dwellings to have 2% serviced dwelling plots for self-build dwellings. Over the plan period, this is estimated to deliver 96 plots. Currently, there are 50 people on the Council's self-build register. However, the number of individuals on the self-build register has previously been as high as 312.

The Council keeps a register of individuals and groups of people who are seeking to purchase serviced plots of land to build their own home in the local authority area. The register helps the Council understand the demand for serviced plots of land within the borough. The number of individuals on Welwyn Hatfield's Self build register as at 30 October 2022 was 50. To support delivery of Self-build and custom housebuilding the Council is preparing guidance.

s

MM15, Page 67, Policy SP 7, Accessible and adaptable dwellings

A Further Main Modification (FM9) is proposed that reflects the viability evidence currently held in the evidence base for the Emerging Local Plan.

MM19, Page 67, Policy SP7, Para 6, Pitch provision for Gypsies and Travellers

As recognised, the plan, as amended by the MMs, would not provide sufficient housing land to meet the Borough's development needs to beyond 2032, however the strategy to deliver pitch provision for Gypsies and Travellers is considered justified as the strategy (para 9.25) identifies delivery on Strategic Development Sites or on suitable alternative sites nearby. The plan, as modified, identifies Strategic Development Sites delivering to the end of the plan period (2036). A Further Main Modification (FM10) is proposed that corrects the error in MM19 which incorrectly attributes Barbaraville as an off-site contribution for SDS6 (Hat15).

MM21, Page 79, SADM 10, Site EA10, London Road, Woolmer Green

A Further Main Modification (FM11) is proposed that clarifies that part of the EA10 allocated employment area is currently undeveloped, so may enable business expansion or a new business to locate. It is understood that this is within the ownership of the businesses rather than the promoter of site HS15.

MM22, Page 81, Policy SP 9 Place Making and High-Quality Design Masterplanning
HS6 Gosling Park

MM22 introduced a requirement for master planning at HS6 Gosling Park. The owner of site HS6 (Welwyn Hatfield Borough Council) is to prepare a masterplan to consider how it could effectively accommodate the needs, priorities and recommendations for indoor and outdoor sports facilities as set out in the Council's Sports Strategy. This will identify the location within Gosling Park that is suitable for residential development.

HS11 South Way

A site specific requirement of HS11 South Way is the provision of a 2fe primary school site to support the needs for additional primary school capacity in south Hatfield. It is necessary that consideration be given to a suitable location and ensure timely delivery of a school site as part of the site's development. It is considered that a requirement for a masterplan is therefore justified.

Masterplanning Circumstances

MM22 sets out the circumstances where masterplans are required, including in the fourth bullet point complex or sensitive issues such as listed building, conservation areas or heritage assets. It is not considered that the fourth bullet is an exhaustive list. Therefore, including reference to locally designated heritage assets is not considered necessary. Also, the Council does not currently have a list of locally listed heritage assets (a 'local list')

Taller Buildings

A Further Modification (FM12) is proposed for SP 9 to be justified and effective, the FM references the importance of the setting of listed buildings and the impact that tall buildings may have.

MM24, Page88, SADM12, Criterion iii

Electric Vehicle (EV) charging is fast moving and dynamic and it is considered specific requirements in the local plan are not necessarily the optimum approach. The Council is preparing guidance (including consultation) on EV charging provision in the second half of 2023 and this will link with the recently updated requirements within Building Regulations. A Further Main Modification (FM13) is proposed setting out the Council's intention to bring forward a more detailed policy on electric vehicle charging provision requirements at an early opportunity.

MM25, Page 105, Fig 8

A Further Main Modification (FM14) is proposed to reinstate HS2 on Figure 8.

MM27 Page 112, Ecological assets, criterion i

Further Main Modifications (FM14 and FM15) are proposed to support the Council in the delivery of biodiversity net gain. This includes a 10% biodiversity net gain requirement and reference to the Local Nature Recovery Strategies in policy wording to comply with legislation and new ecological network mapping evidence. The Council is preparing guidance on BNG to support its delivery.

MM32, Page 131, Garden City Principles for master planning strategic developments.

It is not considered necessary to revise Garden City principles as proposed in MM32. Development proposals will be required to consider all the policies in the plan which address issues including biodiversity net gain, housing tenure and public transport/demand management. The final paragraph of (page 131) states that

“Following on from these principles, it will be necessary to agree and implement comprehensive design principles as part of the masterplanning process. **These should allow for creativity and innovation,** respecting its heritage but not necessarily mimicking existing

garden city or new town architecture – new development should be an asset to the borough” [Emphasis my own].

The TCPA defines key principles of a Garden City which further add to the context but do not necessarily need to be spelt out in the principles for master-planning strategic development.

MM 36, Page 141, SADM 21, Housing allocations in Welwyn Garden City
Site HS12 Town Centre North - Campus East

An application for 313 dwellings is pending consideration at HS12, if approved it would deliver additional dwellings over the notional 250 dwellings that are indicated in the table and the housing trajectory. However, the application is yet to be considered and the general approach taken is that subsequent planning applications only replace the notional local plan number when at application determination. This was the case at the Biopark which increased from 250 to 289 when granted on appeal.

HS6 Gosling Park

As stated above the redevelopment of Gosling Park is to be subject to a masterplan to inform future sport provision on the site. Any future loss of sports provision would need to be assessed against the criteria in Policy SADM7. The housing trajectory identifies the delivery of the site within the middle part of the plan (years 7 and 8) and given this, the level of detail provided on the site’s delivery is considered appropriate.

MM 37 Page 144, Policy SP 17, Mixed use development site at Broadwater Road

There are planning applications that would achieve additional development on the Broadwater Road site in excess of the implemented scheme but they await consideration from the Council, having been submitted in 2021. Ownership of the northern part of the site has changed since the applications were submitted. There are also significant objections to the applications. It may be the case that the site can deliver more than the consented scheme but the decision of the council in July 2022 was to present the consented scheme within the local plan not a notionally higher number (as confirmed in the letter to the Inspector EX289)

A Further Main Modification (FM16) is proposed to correct an error in MM37. Although the loss of the Biopark site to residential had been accounted for in the text and in overall calculations on employment provision within the plan, it had not been removed from the wording of this part of the policy.

MM38, Page 149, SP 18, Fig 11, Northeast of Welwyn Garden City (Policy diagram)

The site boundary as indicated on Figure 11 reflects the current ownership boundary and the area promoted for development. Strategic diagrams are illustrative layouts prepared to inform detailed site proposals. With justification proposals can come forward with revisions. An outline planning application for the phase 2 area of the site is pending considered by the Council.

Figure 11, as amended by MM38, seeks to maximise the achievable extend of the developable area and with the planting/landscaping will create a strong Green Belt boundary. Historic England had reservations in relation to proposed development on the area south-west of Hens Lane, i.e. the triangular field parcel at the western end of the application site. Meetings between the promotor, Historic England and representatives of Welwyn Hatfield Borough

Council established the extent of the developable area deemed acceptable in landscape and heritage terms – as set out in the Statement of Common Ground (SOCG) between these parties dated April 2021. Work by the site promoter during summer 2021 explored extending development to the triangular field parcel at the western end of the application site to accommodate additional dwellings, at which time Historic England expressed its concerns and the need for a robust assessment of impacts to landscape character, visual amenity and heritage. The Green Belt boundary, as amended in MM38, is drawn to reflect the discussions that have taken place. There are robust landscape and heritage reasons justifying the exclusion of this area.

A Further Main Modification (FM17) is proposed which better shows the extent of Tewinbury SSSI and other indicated areas on the policy diagram. The previously consulted Main Modification featured an updated version of Figure 11 which had faded colours due to a file formatting error.

MM39, Page 150, SP19, Southeast of Welwyn Garden City (second bullet)

A Further Main Modification (FM18) is proposed in response to the representation submitted by East Herts District Council in respect to the provision of Gypsy and Traveller provision. The further modification reflects the position of both council's and has been informed by the emerging masterplan for the site.

Blackthorn Wood on Black Fan Road/Cole Green Road is to the west of the Green Corridor. As per SP19 Fig12 a green buffer is required between the development and the wood. This is a consideration in the emerging masterplan, and it is proposed that the existing trees / hedgerows be retained and strengthened. The proposals as set out in MM39 are to be further considered at the masterplan stage and are considered to adequately protect this site.

MM44 Policy SADM 26 New dwellings in Hatfield
HS11 Land at South Way

The view of Hertfordshire County Council as education authority remains that there is a need for additional primary school capacity in southern Hatfield. Also, that existing schools cannot support this need and therefore a new school site at HS11 is required. The requirement for a school that will serve the needs of southern Hatfield needs to be carefully considered (access arrangements, phasing etc) together with other site-specific considerations such as landscaping/Green Belt buffers. For these reasons it is considered justified to require a masterplan for the site.

MM45. Page 171, SP 22 North West Hatfield Additional text to the eighth bullet point

A Further Main Modification (FM19) is proposed to require(s) off-site highway works in connection with the development of this site. They will require a new or improved cycle/pedestrian footbridge or underpass facilities above or below the A1(M).

MM46 Policy SADM 27 Woolmer Green
HS15 Land east of London Road

It is considered that the site-specific consideration that refers to the provision of woodland planting along the northern boundary is sufficient and would be effective. The approach taken at HS15 (screening for both the residential development and employment), is consistent with our approach to the treatment of green belt boundaries and an area is highlighted on the Policies Map for this provision.

HS43 51-53 London Road

The site specific considerations listed are not an exhausted list. Subject to the layout of the development there maybe a requirement to address the relationship with the Public Right of Way, it is considered that this could be a planning application consideration and as necessary S106 or CIL be utilised for necessary improvements.

HS49 Policy SADM 30 Welham Green

MM4 shows the increase for Welham Green as being (total capacity) from 121 dwellings to 329 dwellings. Such a level of development is considered appropriate given Welham Green's highly sustainable location. An updated highway assessment is not considered necessary, notwithstanding this the Highway Authority has been consulted on the MM and have not raised any concern.

MM50 SP 23 Marshmoor Policy Area

Employment is the primary focus of development at this site but there would be a limited amount of residential development. Gascoyne Estates who have promoted the site throughout the examination have remained consistent in their argument that affordable accommodation is needed to bring forward the employment offer on the site. The suggestion in Durkan's paragraph 26 to remove some wording from the MM would remove this link, and the suggestion in paragraph 28 to remove a smaller amount of wording would weaken this link. A Further Main Modification (FM20) is proposed to clarify that the residential aspect of the site will be linked to the employment.

MM51 Policy SADM 31 Brookmans Park
HS22 Land West of Brookmans Park Railway Station

A Further Main Modification (FM21) is proposed which addresses the Highway Authority observation that off-site highway works are required in connection with the development of this site which will require a new or improved cycle/pedestrian footbridge over the railway line.

MM52, Page 191, Policy SADM 32 Little Heath HS47 Videne and Studlands, Hawkshead Road

The Council has robustly considered the Green Belt boundary in this location both in terms of the boundary to the north-west of the site and in the vicinity of the Kingdom Hall. This is set out in Examination document EX268

MM53, Page 193, SADM33, Cuffley

A further Main Modification (FM22) is proposed in relation to off site highway infrastructure improvement(s) works being recorded as site-specific considerations.

HS27 The Meadway

A further Main Modification (FM22) is proposed in relation to a specific requirement to consider the impact and necessary improvements to the junction of the Meadway and Station Road.

Chapter 27 Implementation and Monitoring

Modifications are required to this section of the Plan and several are proposed in the Further Main Modification schedule (FM23), it is considered that they update and reflect changes made elsewhere in the plan.

Appendices

The housing and employment floorspace trajectories (Figs 17 and 18) have changed. Further Main Modifications (FM24) are proposed in relation to these.

Policy Maps changes

Site HS2 Creswick includes a site specific consideration for a tree planting screen along its southern boundary, as required by MM36. The corresponding policy maps change produced for the consultation in January/February 2023 was cropped in a way that did not show the illustrative location. A policy map change is proposed showing the location of planting within the Green Belt.

I trust the above is of assistance in your consideration the plan. Should you have any questions, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Chris Carter', with a long horizontal stroke extending to the right.

Chris Carter
Assistant Director – Planning

Enclosed:
Schedule of Proposed Further Main Modifications