

Matter 7 – Residential Site Allocations

Issue 4 – Wheathampstead Site Allocations

Policy M2 – Hill Dyke Road

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

What is the justification for the proposed alteration to the Green Belt boundary?

- 1.1 The primary justification is the need to deliver the housing requirements set out in the Plan, which is seeking to meet the 'Standard Method' for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.

Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 1.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3.

- 1.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 50, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundaries of the sub-area are readily recognisable and likely to be permanent. The outer boundaries of the sub-area are readily recognisable but not necessarily likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-29.

- 1.5 There are effectively two new proposed Green Belt boundaries in the Plan, which are:

Eastern boundary – Dyke Lane and a well-established historic woodland edge
Southern boundary – well established linear tree belt

- 1.6 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 2.2 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) which sets out in paragraph 7.2 that:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- The acuteness/intensity of the housing need.*
- The inherent constraints on supply/availability of non-Green Belt land.*
- The difficulties of delivering sustainable development without impinging on the Green Belt.*
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*

- *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

2.3 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.

2.4 In relation to the specific case in this location, Hill Dyke Road, Wheathampstead, AL4 8TR, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 on pages 232 to 234, relating to sub-area 50, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 and 4, performs weakly against purpose 2 and performs strongly against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays a significant role with respect to the strategic land parcel, however if released in isolation, is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-29.

2.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 46 to 48 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

This site is recommended for further consideration by the Green Belt Stage 2 Report.

...

This site is recommended to progress.

- 2.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q3 How have the effects of development on the setting and significance of the Devil's Dyke and Slad Scheduled Monument been taken into account in the allocation of the site, including any impacts on assets of archaeological significance?

- 3.1 The effects of development on the setting and significance of the Devil's Dyke and Slad Scheduled Monument, including any impacts on assets of archaeological significance, have been taken into account in the allocation of the site through the undertaking of a Heritage Impact Assessment and through the related policy requirements.
- 3.2 The strategy for undertaking Heritage Impact Assessments (HIAs) for certain sites was summarised in EDH 04.01 - Heritage Impact Assessment Draft Cover Report (2024) as follows:

2. Background

2.1. Prior to the Regulation 18 Draft Local Plan Consultation, which ran from July to September 2023, the Council identified that a number of the proposed site allocations could impact on the historic environment by affecting the setting of nearby heritage assets. At that stage it had not provided site-specific HIAs as part of its evidence base, but the intention was for these to be undertaken to a proportionate degree ahead of the Regulation 19 Plan.

2.2. The Regulation 18 Consultation Historic England (HE) response concurred with the Council's intention to produce proportionate site-specific HIAs to inform the Regulation 19 Plan. HE advised that the purpose of the HIAs will be to identify any heritage assets which could be affected by development of a given site, to consider their significance (including any contribution made by their setting), and assess the impact that any proposed development might have on the significance of those assets. HE suggested that the best way to explore options for mitigation is through the preparation of site-specific HIAs; particularly for large strategic sites or sites where there are particularly significant heritage issues e.g. highly graded heritage asset either on site or in close proximity. HE made clear that it is a question of proportionality; the bigger the site or the more important the heritage issues, the more evidence they would expect to see.

2.3. Through ongoing dialogue with HE it was established that a total of 52no. of the Regulation 19 allocation sites should be subject to the Council's Heritage Impact Assessment 2024, and the Council appointed Essex Place Services to undertake the longer and more detailed assessments. The proportionate approach agreed with HE resulted in the following HIA work being undertaken:

...

a) Detailed Site Assessments undertaken by Essex Place Services for the following 8no. sites:

...

- *M2 - Hill Dyke Road, Wheathampstead, AL4 8TR*

3.3 As such, this site was one of the 8no. sites subject of Detailed Site Assessments undertaken by Essex Place Services, recognising the potential heritage impact of the allocation. This HIA is at EDH 04.05 - Heritage Impact Assessment Appendix 4 M2 Hill Dyke Road (2024).

3.4 Section 6 of the HIA sets out the 'Potential Impact of Development' with two sub-sections focusing respectively on potential impacts on the Designated Heritage Assets of 'Wheathampstead earthwork incorporating Devils Dyke and the Slad (Scheduled Monument, list entry number:1003521)' and potential impacts in relation to Archaeology.

3.5 The HIA's 'Conclusions and Recommendations' section reads as follows:

6. Conclusions and Recommendations

6.1 This Heritage Impact Assessment has been prepared by Place Services for Site M2. This document provides an assessment of heritage impact for the Allocation of M2 ('the Site') as referred to in the Local Plan.

Design Recommendations & Mitigation

6.2 This assessment has identified that there is the potential for archaeological deposits within the Site and these should be assessed by an appropriate desk-based assessment and geophysical survey. The results of these investigations may further inform the development proposal.

6.3 At planning application stage, a Heritage Impact Assessment and an archaeological desk-based assessment should be undertaken for the Site. This will need to be followed by non-intrusive and potentially intrusive evaluation to support and inform a planning application. Early consultation with the Local Planning Authority is recommended, as appropriate. This should consider how attempts to avoid or minimise harm to the asset have been explored, for example the extent of open space and the use of a significant set back from the monument itself and the use of these spaces. Mitigation alone, through the use of an appropriate landscaping scheme, is unlikely to avoid or minimise harm.

6.4 There is the potential for promotion and management of the Scheduled Monument as part of any development that occurs. The potential for funding of improved management and promotion of the monument should be considered and discussed with Historic England, as appropriate.

- 3.6 It is considered that heritage protection in line with the above is suitably secured through the requirement in Policy LG4 o) and the allocation Key development requirement No. 4; as follows:

LG4 – Large, Medium and Small Sites

The Council has allocated sites to support growth that are smaller in size and scale than the Broad Locations. These sites are set out in Part B. Proposals on these sites (or unallocated windfall development at this scale) must accord with the following requirements in addition to the site-specific requirements listed in Part B:

...

o) For sites listed in Appendix 5, development proposals must be informed by a detailed Heritage Impact Assessment and where applicable Archaeological Desk-Based Assessment which address the recommendations of the Council's Heritage Impact Assessment.

...

Key development requirements

4. The layout of development should minimise any harm to the setting and significance of the Devil's Dyke and the Slad Scheduled Monument; this may include a significant set back from the east boundary. Development proposals should also demonstrate how they will enhance the understanding and local interpretation of the Monument.

- 3.7 It should also be noted that further discussion with Historic England in relation to their Regulation 19 comments for this site resulted in agreement that no change is required for soundness, and that the aforementioned Key development requirement plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection. This is set out at M12I1Q7 - Appendix 2 - SoCG SADC and HE October 2025 and M12I1Q7 - Appendix 3 - HE Comments and Agreed Mods October 2025.
- 3.8 Taking the above into account, the effects of development on the setting and significance of the Devil's Dyke and Slad Scheduled Monument, including any impacts on assets of archaeological significance, have been taken into account in the allocation of the site through the undertaking of a Heritage Impact Assessment and through the related policy requirements. It is also noted that the Council's approach for this site has the agreement of Historic England.

Q4 Is Policy M2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 4.1 Yes, it is considered that Policy M2 is justified, effective and consistent with national planning policy.

- 4.2 Policy M2 is justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024). Paragraph 7.2 states:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- *The acuteness/intensity of the housing need.*
- *The inherent constraints on supply/availability of non-Green Belt land.*
- *The difficulties of delivering sustainable development without impinging on the Green Belt.*
- *The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

- 4.3 As answered above in Policy M2 M7I4Q2, Policy M2 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 4.4 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M2 M7I4Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 4.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Site ref C-283) on pages 46 to 48 LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) and as set out in Policy M2 M7I4Q2.
- 4.6 Policy M2 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England

- 4.7 Policy M2 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024).
- 4.8 Overall, Policy M2 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 4.9 N.B. Policy M2 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M9 – Amwell Top Field

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

What is the justification for the proposed alteration to the Green Belt boundary?

- 1.1 The primary justification is the need to deliver the housing requirements set out in the Plan, which is seeking to meet the 'Standard Method' for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.

Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 1.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review

Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3.

- 1.4 Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 53, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundaries are predominantly readily recognisable and likely to be permanent. The outer boundaries are predominantly readily recognisable but not likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening. Recommended for further consideration in isolation as RA-30 (including the strip of Green Belt land to the north of the sub-area).

- 1.5 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

North-western boundary – Amwell Lane

South-western boundary – well-established woodland

Eastern boundary – well-established linear tree belt and woodland

- 1.6 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.

The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) which sets out in paragraph 7.2 that:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

The acuteness/intensity of the housing need.

The inherent constraints on supply/availability of non-Green Belt land.

The difficulties of delivering sustainable development without impinging on the Green Belt.

The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.

The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

- 2.2 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.

- 2.3 In relation to the specific case in this location, Amwell Top Field, Wheathampstead, AL4 8DZ, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 on pages 243 to 246, relating to sub-area 53, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or purpose 4, performs weakly against purpose 2 and performs strongly against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening. Recommended for further consideration in isolation as RA-30 (including the strip of Green Belt land to the north of the sub-area).

- 2.4 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors.

For this location, the site selection outcome is set out on pages 49 to 50 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

Part of the site is recommended for further consideration by the Green Belt Stage 2 Report.

...

This site is recommended to progress.

- 2.5 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q3 How have the effects of development on the setting of the Amwell Conservation Area been taken into account in the allocation of the site?

- 3.1 The effects of development on the setting of the Amwell Conservation Area have been taken into account in the allocation of the site through the undertaking of a Heritage Impact Assessment and through the related policy requirements.
- 3.2 The strategy for undertaking Heritage Impact Assessments (HIAs) for certain sites was summarised in EDH 04.01 - Heritage Impact Assessment Draft Cover Report (2024) as follows:

2. Background

2.1. Prior to the Regulation 18 Draft Local Plan Consultation, which ran from July to September 2023, the Council identified that a number of the proposed site allocations could impact on the historic environment by affecting the setting of nearby heritage assets. At that stage it had not provided site-specific HIAs as part of its evidence base, but the intention was for these to be undertaken to a proportionate degree ahead of the Regulation 19 Plan.

2.2. The Regulation 18 Consultation Historic England (HE) response concurred with the Council's intention to produce proportionate site-specific HIAs to inform the Regulation 19 Plan. HE advised that the purpose of the HIAs will be to identify any heritage assets which could be affected by development of a given site, to consider their significance (including any contribution made by their setting), and assess the impact that any proposed development might have on the significance of those assets. HE suggested that the best way to explore options for mitigation is through the preparation of site-specific HIAs; particularly for large strategic sites or sites where there are particularly significant heritage issues e.g. highly graded heritage asset either on site or in close proximity. HE made clear that it is a question of proportionality; the bigger the site or the more important the heritage issues, the more evidence they would expect to see.

2.3. Through ongoing dialogue with HE it was established that a total of 52no. of the Regulation 19 allocation sites should be subject to the Council's Heritage Impact Assessment 2024, and the Council appointed Essex Place Services to undertake the longer and more detailed assessments. The proportionate approach agreed with HE resulted in the following HIA work being undertaken:

...

c) High-Level Heritage Impact Assessments by the Council for the following 26no. sites:

...

- M9 – Amwell Top Field, Wheathampstead, AL4 8DZ

3.3 As such, this site was one of the 26no. sites subject of High-Level Heritage Impact Assessments by the Council, recognising the potential heritage impact of the allocation. This HIA is found at pages 8-10 of EDH 04.08 - Heritage Impact Assessment Appendix 7 High-Level HIAs by SADC (2024).

3.4 The 'Assessment' section of the HIA sets out:

Development of the site is considered likely to impact on the setting and significance of the adjacent Amwell Conservation Area to some degree. In order to preserve the setting of the Conservation Area a substantial open space set back should be maintained – to maintain a clear separation between the development and the island of the Amwell Conservation Area.

As a result of the distance and the intervening development and tree screening, and subject to a substantial set back of built development from the Amwell Conservation Area, it may be the case that the significance of other designated heritage assets would not be significantly affected. However, further assessment of a particular development proposal would be required at application stage. There is potential for development of the site to impact on non-designated below-ground heritage assets.

There is the presence of a probable Bronze Age or potential Roman cemetery immediately to the south of the site; there is potential for important buried archaeological deposits being present, and there are no modern impacts on the site apart from pipeline and ploughing. An archaeological assessment would be required in order to understand likely impacts.

3.5 The concluding 'Recommendations / Mitigation' section of the HIA sets out:

There are no likely impacts on heritage assets that preclude the site's allocation, but in order to preserve the setting of the Amwell Conservation Area a substantial open space set back should be maintained. Built form should be located in the northern half of the site, adjacent to High Ash Road.

Development proposals should be informed by the results and recommendations of: a detailed heritage impact assessment which assesses impacts on built heritage; and an appropriate archaeological deskbased assessment (DBA) with further field

evaluation if required. As the known evidence for the buried archaeological deposits is from aerial photographic data, a rectified aerial photographic assessment should be produced along with the archaeological DBA; this should require pre-determination trial trenching in advance of masterplanning of development proposals, to consider preservation in situ if below ground deposits extend into the allocation area.

The assessments should be undertaken in accordance with latest national policy and guidance, and should consider impacts on the significance and setting of any heritage assets affected.

- 3.6 It is considered that heritage protection in line with the above is suitably secured through the requirement in Policy LG4 o) and the allocation Key development requirement No. 5; as follows:

LG4 – Large, Medium and Small Sites

The Council has allocated sites to support growth that are smaller in size and scale than the Broad Locations. These sites are set out in Part B. Proposals on these sites (or unallocated windfall development at this scale) must accord with the following requirements in addition to the site-specific requirements listed in Part B:

...

o) For sites listed in Appendix 5, development proposals must be informed by a detailed Heritage Impact Assessment and where applicable Archaeological Desk-Based Assessment which address the recommendations of the Council's Heritage Impact Assessment.

...

Key development requirements

5. To preserve the setting of Amwell Conservation Area, built form must only be located in the northern half of the site adjacent to High Ash Road, and provide a substantial (approx. half the site) open space buffer and suitable tree screening to the south and south west.

- 3.7 It should also be noted that the Regulation 19 response of Historic England in relation to this site reads, in full:

The site is adjacent to the Amwell Conservation Area.

We welcome the preparation of a high level HA by SADC. We welcome criterion 5 of the policy.

- 3.8 Taking the above into account, the effects of development on the setting of the Amwell Conservation Area have been taken into account in the allocation of the site through the undertaking of a Heritage Impact Assessment and through the related policy requirements. It is also noted that the Council's approach for this site has the agreement of Historic England.

Q4 What impact does the pipeline running through the site have on its deliverability for housing, when also considering the need for mitigation in response to Q3 above?

- 4.1 There is considered to be no impact from the pipeline running through the site on its deliverability for housing, when also considering the need for mitigation in response to Q3 above. The document Reg 19 Local Plan Part B (2024) (LPCD 02.02) sets out in the key development requirements that:

There is a pipeline running through the site, and development proposals must appropriately take this into account.

- 4.2 Green Belt Sites Recommended Medium & Small Site Proformas (2024) (LPSS 02.06) is more specific on the location, stating:

A gas pipeline runs through the centre of the site from north-west to south-east.

- 4.3 The LPCD 02.02 Local Plan Part B Key development requirements set out where housing is expected to be located:

To preserve the setting of Amwell Conservation Area, built form must only be located in the northern half of the site adjacent to High Ash Road, and provide a substantial (approx. half the site) open space buffer and suitable tree screening to the south and south west.

- 4.4 The location of the pipeline is drawn as the blue line on the map below. This map shows how development can take place on the northern half of the site without affecting the pipeline as the southern portion of the site is set to remain as the space buffer with suitable tree screening.



- 4.5 For the avoidance of doubt, the site capacity of 60 homes has fully taken account of the fact that the southern half of the site will contain no residential development.

Q5 How will the site be accessed? Can a safe and suitable access be achieved if Amwell Lane is not to be used?

How will the site be accessed?

- 5.1 The exact vehicular access routes have not been finalised. There are a variety of options, including: access via Old School Drive; access via High Ash Road; or access from Harpenden Road via the field immediately to the west of Amwell Lane.

Can a safe and suitable access be achieved if Amwell Lane is not to be used?

- 5.2 Yes, it is considered that there is a reasonable prospect that a safe and suitable access can be achieved if Amwell Lane is not to be used.
- 5.3 The view of both SADC as LPA and HCC as Highways Authority is set out in INF 09.09 - Transport Impact Assessment Appendix 1 Wheathampstead (2024):

3. Access Strategy

The site has direct access onto Amwell Lane, however the nature of the lane means both policy and technical barriers exist. More detailed work will be needed. There is a reasonable prospect that a Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable.

...

7. Conclusion

The site will be making significant contributions to sustainable travel for Wheathampstead.

There is a reasonable prospect that an LTP compliant access strategy allowing safe access for all modes is deliverable.

The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety.

Overall there are 'no showstoppers'.

- 5.4 With several site access options potentially available the site is considered to meet the test of "developable" as set out in the NPPF in Annex 2: Glossary

...

Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 5.5 The site is set out as being "developable" site and is anticipated to come forward in years 2033-2036 of the Plan (6-10 years post-adoption), taking a relatively cautious

approach (as set out in Matter 2 Issue 1 Question 1 Appendix 1 – Updated Housing Trajectory Addendum).

Q6 Is Policy M9 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 6.1 Yes, it is considered that Policy M9 is justified, effective and consistent with national planning policy.
- 6.2 As answered above in Policy M9 M7I4Q2, Policy M9 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 6.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M9 M7I4Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 6.4 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Site ref C-280) on pages 49 to 50 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) and as set out in Policy M9 M7I4Q2.
- 6.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site M9 for allocation, which states at paragraph 5.4.112:

5.4.112

...

• Amwell Top Field (60 homes) – is to the south of the village, as per the site discussed above (and mindful that this has been the main direction of village expansion over the decades). However, this is a more sensitive site in landscape and access terms, and the Parish Council raise concerns. In particular, there is some uncertainty around access arrangements, noting that Amwell Lane has a rural character and is likely to be a popular route between Wheathampstead and the historic hamlet of Amwell (where there is a designated conservation area and a pub, as well as to Nomansland Common / Heartwood Forest).

The site is clearly visible from Amwell Lane (depending on hedgerow height), and this is raised land, in contrast to the majority of Wheathampstead to the north, which is associated with the valley of the River Lee. However, it is noted that the consultation response received from the land owner in 2023 (re 917) agreed with the need to deliver open space and screening, and also proposed a public right of way enhancement. There is a clear commitment to retaining the southern half of the site as open space.

- 6.6 Policy M9 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
- 6.7 Policy M9 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01 the Sustainability Appraisal.
- 6.8 Overall, Policy M9 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 6.9 N.B. Policy M9 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.