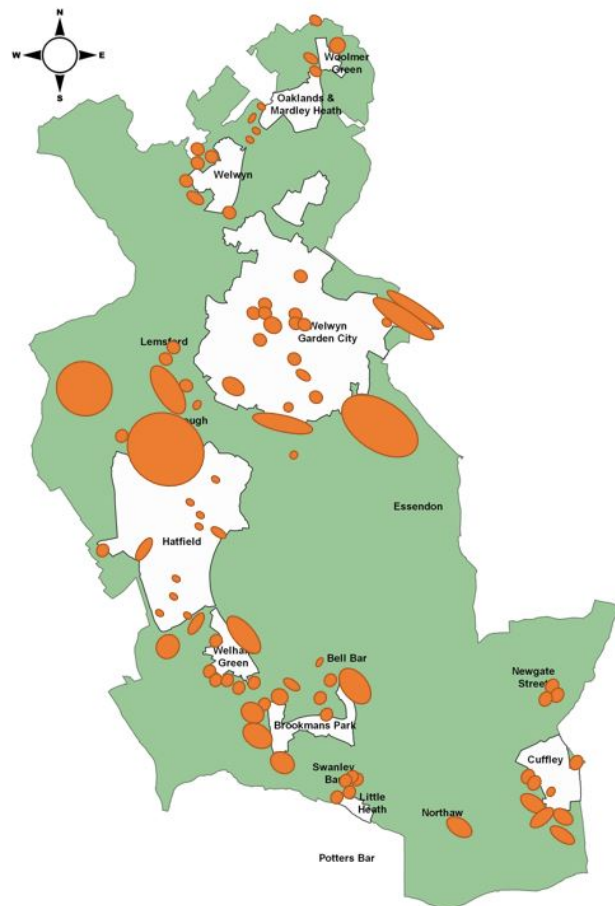


# Welwyn Hatfield Local Plan

## Site Selection Background Paper 2019



© Crown copyright. All rights reserved Welwyn Hatfield Borough Council OS LA100019547 2019.



**WELWYN  
HATFIELD**

*Working better, together*

## **1. Introduction**

- 1.1 The selection of sites for allocation in the Draft Local Plan Proposed Submission 2016 (the submitted draft plan), was informed by a Housing Sites Selection Background Paper (HOU/20 and 20a) and an Employment Site Selection Background Paper 2016 (ECO/8 and 8a).
- 1.2 In summary, those papers brought together, the key conclusions arising from the following strands of evidence and appraisals:
  - The Housing and Employment Land Availability Assessment (HELAA) 2016 (HOU/19)
  - The Green Belt Study Review Part 1 (GB/1) and Parts (GB/2 and GB/3)
  - An appraisal of Green Belt boundaries
  - The Sustainability Appraisal 2016 (SA/6)
  - Flood Risk – Sequential Test 2016 (ENV/13 and ENV/13a) and
  - A consideration of strategic advantages or disadvantages.
- 1.3 Consideration was also given to any infrastructure constraints at a settlement level, which in certain instances affected whether or not some sites were proposed for allocation. As noted in the introduction, to both papers, this evidence reflected circumstances as they were understood at that particular point in time.
- 1.4 The 2016 background papers continue to provide a useful reference point for any interested party wishing to understand how the sites proposed for allocation in the submitted draft plan were identified at that time.
- 1.5 However, since the draft plan was submitted to the Secretary of State for examination in May 2017, a number of Local Plan Examination hearing sessions have been held. During the course of the examination, the Planning Inspector has raised the following matters with the Council<sup>1</sup>:
  - a) The submitted plan does not meet the identified need for housing (and as a result, the Inspector asked the Council to carry out a further Green Belt study to determine if any additional housing sites could be identified).
  - b) The amount of employment land to be allocated should be related to the accompanying housing proposals put forward. A situation where employment growth outstrips housing growth, would not (in the Inspector's opinion) be a sustainable outcome and would not be found sound.
  - c) In the process of moving the plan forward, the Council will need to determine what its approach to the Green Belt is going to be and what

---

<sup>1</sup> The Inspector's letter to the Head of Planning (Examination Document: EX/91B):  
[https://welhat.gov.uk/media/14095/EX91B-Letter-from-the-Inspector-to-Colin-Haigh/pdf/Letter from the Inspector to Colin Haigh.pdf?m=636764232175500000](https://welhat.gov.uk/media/14095/EX91B-Letter-from-the-Inspector-to-Colin-Haigh/pdf/Letter%20from%20the%20Inspector%20to%20Colin%20Haigh.pdf?m=636764232175500000)

weight is to be given to the findings of the most up to date Green Belt Study.

- d) Exceptional circumstances would need to be advanced before site allocations could be found sound, noting that some proposed development sites are considered more harmful than others.

1.6 In light of these matters raised by the Inspector, the Council has taken the following steps.

- The evidence relating to the Objectively Assessed Need for Housing has been reviewed. Section 4 of this paper explains further.
- The evidence around economic forecasts has been reviewed, alongside an assessment of employment needs arising from the growth in the resident workforce, taking account of the inspector's concerns summarised above. Section 5 of this paper explains further.
- The Green Belt evidence has already been updated and was the subject of the stage 5 Hearing sessions held in November 2018, these are referred to as the Green Belt Study Stage 3<sup>2</sup>.

1.7 This Housing and Employment Sites Selection Background Paper 2019 sets out the key issues and the process associated with the selection of additional sites to inform the on-going examination of the submitted draft plan. Whereas in 2016, separate papers were produced for Housing and Employment sites, in 2019 and for ease of reference, a single paper has been prepared.

1.8 In addition to the evidence listed above, this paper takes account of the key conclusions arising from a review of, and updates to, the following evidence-base and appraisals.

- The Housing and Employment Land Availability Assessment (HELAA) 2019<sup>3</sup>
- The Green Belt Study (Stage 3)<sup>4</sup>
- An appraisal of Green Belt boundaries
- The Sustainability Appraisal (2019)
- Flood Risk – Sequential Test (2019)<sup>5</sup> and
- A consideration of strategic advantages or disadvantages.

1.9 To address the Inspector's comments on exceptional circumstances, this paper also considers the Calverton test, a High Court Judgement that set out

---

<sup>2</sup> GB/4 (EX/88B, EX88C, EX88D): Welwyn Hatfield Green Belt Study Stage 3 Main Report, Figures updated and Appendices 2018; and GB/5: LUC Green Belt Study Stage 3 Final Report, Addendum, Appendices and Figures

<sup>3</sup> Welwyn Hatfield Housing and Economic Land Availability Assessment December 2019 (Addendum to the HELAA 2016)

<sup>4</sup> Ibid paragraph 1.6

<sup>5</sup> <https://www.welhat.gov.uk/evidencebase>

a number of matters to be considered when assessing if 'exceptional circumstances' have been met, which is discussed in more detail in Section 6 and within the conclusions relating to the updated assessment of sites options at a settlement level presented in Sections 10-24 of this paper.

- 1.10 The methodology for assessing sites is discussed in more detail in Section 7 of this paper, the evidence and appraisals that have informed the selection process are discussed in Section 8 and the approach to applying weight to and the balancing of the multiple evidence strands is described in more detail in Section 9.
- 1.11 This paper provides a comprehensive summary of all sites considered for inclusion in the updated plan, including a review of sites already proposed for allocation in the draft plan as submitted, and on this basis, should be read as a standalone paper.



## 2. Spatial Context

- 2.1 Welwyn Hatfield borough is located centrally within Hertfordshire and covers an area of approximately 130 square kilometres. It is bordered by Hertsmere to the southwest, St Albans to the west, North Hertfordshire to the north and East Hertfordshire and Broxbourne to the east. The very south of the borough borders the London Borough of Enfield.
- 2.2 The borough has two main towns, Welwyn Garden City and Hatfield. Both are new towns and Welwyn Garden City is one of the original two Garden Cities developed in the UK in the 1920's. There are also a number of smaller settlements, which are excluded from (not in) the Green Belt, which are Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands & Mardley Heath, Welham Green, Welwyn and Woolmer Green. The borough also contains a number of small villages, hamlets and areas of sporadic or ribbon development, which are all currently located in the Green Belt (washed-over).

**Figure 2.1: Map of Welwyn Hatfield Borough**



- 2.3 The Metropolitan Green Belt currently covers approximately 79.1% of the borough, with the remaining area formed mainly of existing built up areas. If all the sites in the submitted Draft Local Plan 2016 were allocated, then on adoption 75.4% of the borough would remain in the Green Belt<sup>6</sup>.
- 2.4 However, as part of the examination of the Draft Local Plan, and in light of the shortfall between the housing target in the draft plan and the acknowledged higher level of housing need, the Council is now exploring whether or not additional sites can be identified to meet the borough's development needs.
- 2.5 This Site Selection Paper draws to a conclusion the technical work that comprises the Council's approach to site selection. As a consequence of this work, a number of additional sites are recommended for removal from the Green Belt. This includes some sites in settlements that are currently washed-over by the Green Belt.
- 2.6 On this basis, should all the recommended sites be allocated, on adoption of the Local Plan, as updated, the proportion of the borough retained in the Green Belt would be 74.2%.

---

<sup>6</sup>Welwyn Hatfield Green Belt Topic paper TPA/2: [https://welhat.gov.uk/media/12338/Topic-Paper-Green-Belt/pdf/TPA\\_2\\_Green\\_Belt\\_Topic\\_Paper\\_Draft\\_May\\_2017.pdf?m=636306227321430000](https://welhat.gov.uk/media/12338/Topic-Paper-Green-Belt/pdf/TPA_2_Green_Belt_Topic_Paper_Draft_May_2017.pdf?m=636306227321430000)

### 3. National Policy Context

- 3.1 Consistent with the National Planning Policy Framework (NPPF) 2019, Annex 1: Implementation (Paragraph 214), the policies in the previous NPPF (March 2012), apply for the purposes of examining plans, where those plans were submitted on or before 24 January 2019.
- 3.2 As the Welwyn Hatfield Draft Local Plan 2016 was submitted prior to 24 January 2019 (in May 2017), and this background paper has been prepared during the examination process, references in this document relate to the NPPF 2012<sup>7</sup> and the associated Planning Practice Guidance 2014<sup>8</sup> (unless otherwise stated).
- 3.3 To boost the supply of housing, Paragraph 47 of the NPPF 2012 states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites that are critical to the delivery of the housing strategy over the plan period.
- 3.4 Significant weight should also be placed on the need to support economic growth. In summary, the NPPF (2012) states that planning authorities should plan proactively to meet the development needs of business and positively and proactively encouraging sustainable economic growth to meet anticipated needs over the plan period. Policies should be flexible enough to allow for changes in economic circumstances, plan positively for the location of networks of knowledge-driven or high technology industries, whilst avoiding the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose<sup>9</sup>.
- 3.5 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development (Paragraph 14).

*“For plan-making, this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

---

<sup>7</sup> NPPF 2012: Archived document:

<https://webarchive.nationalarchives.gov.uk/20180608213715/https://www.gov.uk/guidance/national-planning-policy-framework>

<sup>8</sup> Planning Practice Guidance: Housing and economic land availability assessment 2014: Archived document:

<https://webarchive.nationalarchives.gov.uk/20190607102654/https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

<sup>9</sup> Paragraphs 18 to 22 of the NPPF 2012

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;*
  - *specific policies in this Framework indicate development should be restricted.”*
- 3.6 A footnote to the last bullet point (Footnote 9 in the 2012 NPPF) provides an example of where restrictions may apply. This includes land designated as Green Belt. Paragraph 79 of the NPPF (2012) confirms that:
- “The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”<sup>10</sup>.*
- 3.7 The 2012 NPPF makes it clear that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channeling development towards urban areas inside the Green Belt boundary, and towards towns and villages inset within the Green Belt.
- 3.8 The borough has a number of towns and villages which are excluded from (inset within) the Green Belt. It also has a number of villages which are currently ‘washed over’ by the Green Belt. The NPPF (2012), sets out Government policy for where settlements should be either inset, or washed-over by the Green Belt:
- “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, and the village should be excluded from the Green Belt”<sup>11</sup>.*

---

<sup>10</sup> National Planning Policy Framework March 2012 (Paragraph 79).: Archived document: <https://webarchive.nationalarchives.gov.uk/20180608213715/https://www.gov.uk/guidance/national-planning-policy-framework>

<sup>11</sup> NPPF 2012 (Paragraph 86): Archived document (link as footnote 3)

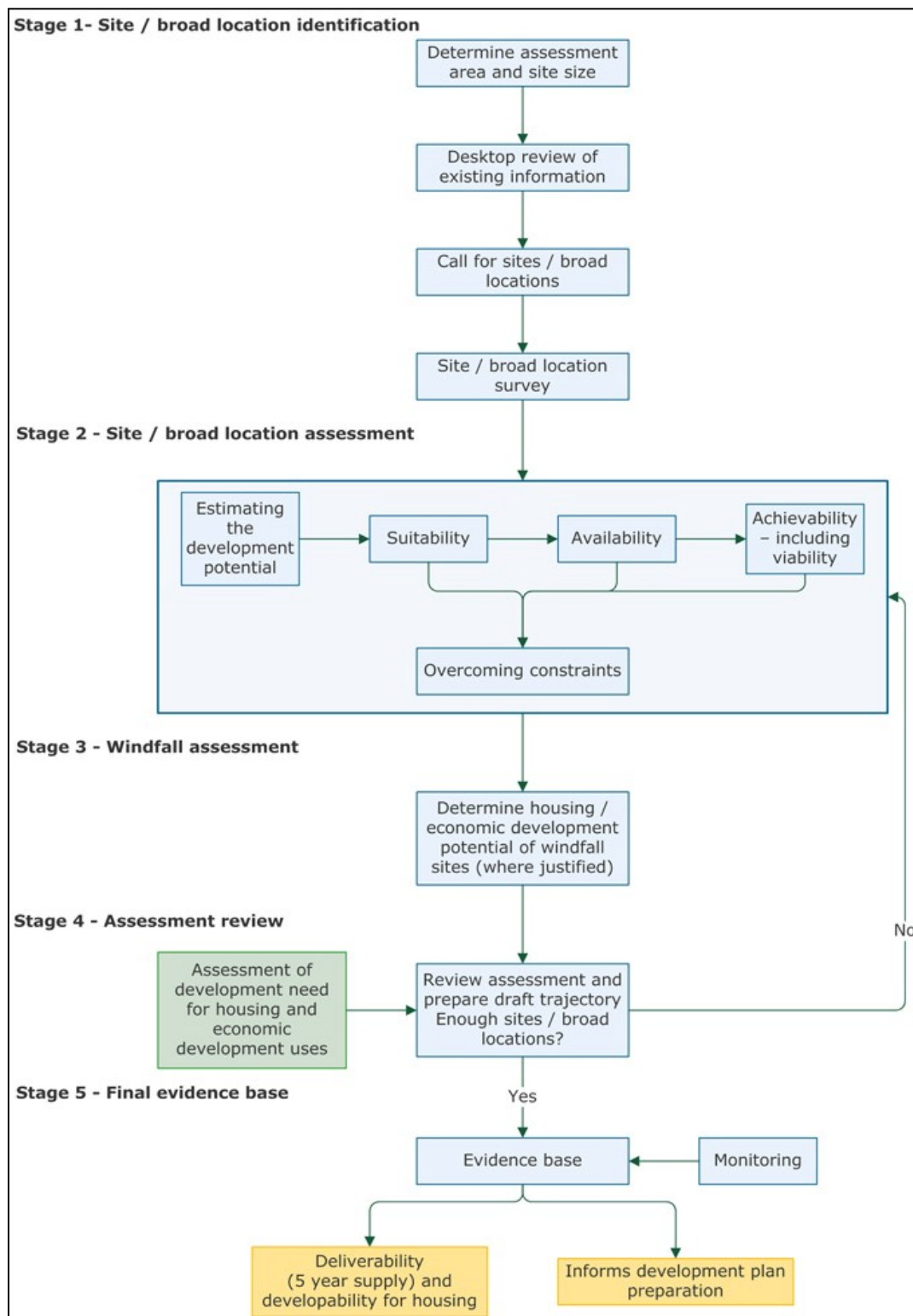
### **The Council's approach to site selection**

- 3.9 The Council's approach to site selection takes account of the national policy context and a comprehensive body of evidence has been prepared to inform decisions. This includes a Housing and Economic Land Availability Assessment (HELAA).
- 3.10 Guidance on the preparation of a HELAA is set out in National Planning Practice Guidance (PPG)<sup>12</sup>. It is made clear in the PPG that the HELAA is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land. However, it is also made clear in PPG that the HELAA:
- "... does not in itself determine whether a site should be allocated for development.... It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements".*
- 3.11 For this reason, the Council's approach to site selection combines the requirements set out in PPG for preparing a HELAA (Figure 3.1), with its own additional assessment steps for identifying sites for inclusion within the local plan. The Council's methodology is explained in more detail in Section 7 of this paper.

---

<sup>12</sup> Planning Practice Guidance, Housing and Economic Land Availability Assessment, 2014 (Paragraph: 003 Reference ID: 3-003-20140306). Archived document:  
<https://webarchive.nationalarchives.gov.uk/20190607102654/https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

**Figure 3.1: HELAA methodology flow chart in PPG**



#### 4. Housing growth (need and land supply)

##### The objectively assessed need for housing

- 4.1 At the time the draft plan was prepared, the Objectively Assessed Need for Housing (the OAN) was assessed as being within the range of **12,616 to 13,434 dwellings (2013-2032)** (664 to 707 dwellings per annum).
- 4.2 The Draft Local Plan 2016 contained sufficient sites for around 12,000 additional homes across the borough.
- 4.3 However, at the time the Council's Cabinet Housing and Planning Panel recommended the draft plan be submitted for examination in 2017, the OAN was under review. Taking into account the 2014 Sub-National Population and Household (SNPP and SNHP) projections, economic forecasts, market indicators, affordability, younger household formation, the effect of London and signals from recent appeals or public examinations, the Strategic Housing Market Assessment (SHMA) Update in 2017, concluded that there was a need in Welwyn Hatfield for around **800 dwellings per annum**, equivalent to **15,200 dwellings** over a 19 year period (**2013-2032**). During the earlier Local Plan Examination hearing sessions, it was acknowledged by officers, that the plan period should extend to 2033 (15 years beyond the then anticipated adoption date of the plan), which indicated a plan-period housing need for 16,000 additional homes (over a 20 year period).
- 4.4 The publication of the 2016-based population and household projections (2016-based SNPP/ SNHP), which were released in May and September 2018 respectively, triggered the most recent review of the OAN. The Council's consultant advised, following their review, that it was reasonable and justified to retain the previously rounded OAN of **800 dwellings per annum**<sup>13</sup>.
- 4.5 A further technical paper '*Implications of a new plan period for the calculated housing need*' has been presented to the examination (EX/103B)<sup>14</sup>. This paper did not seek to present an updated OAN for Welwyn Hatfield, but considered, based upon the evidence presented in the existing 2017 SHMA Update and published subsequent technical notes, the implications of a new plan period (2016-2034) for the calculated housing need.
- 4.6 Representors to the EIP have raised concerns around a change in the start date of the plan period, from 2013 to 2016. As noted in Section 3 of Examination Document, EX/103B, the Courts and the Secretary of State<sup>15</sup>

---

<sup>13</sup> Examination Document: EX/103A: The implications of the 2016-based SNPP and SNHP on the Welwyn Hatfield OAN (Turley, June 2019)

<sup>14</sup> Examination Document EX/103B: Implications of a new plan period for the calculated housing need (Turley, June 2019)

<sup>15</sup> APP/C1570/A/14/2213025: Appeal by LS Easton Park Investments Limited On Land West Of Great Dunmow, Essex

have considered the implications of re-basing the plan period on the calculation of housing need. The judgment specifically referenced in EX/103B<sup>16</sup> confirmed that in re-basing the plan start date, it is not necessary to directly take into account a quantified level of historic undersupply.

- 4.7 However, in the context of the PPG<sup>17</sup>, it is important to acknowledge the extent to which there is evidence of a worsening of market signals, of which under-supply is an important consideration. Should the plan period be moved forward to a base date of 2016, the Council's consultant has advised that it would be prudent and reasonable to recognise evidence of worsening market signals which is likely, in part at least, to have resulted from an under-provision of housing over the period covered by a change in the base date (2013-2016). In this context, a more pronounced adjustment, to respond to the consequences of a worsening in affordability and other market signals, could be reasonably justified.
- 4.8 In drawing together the findings of this work, the Council's consultant has advised that it would be reasonable to continue to apply an **OAN of 800 homes per annum** over the period from 2016 to 2034. If the plan period was extended to 2035, it would be reasonable to extrapolate this annual figure to cover an additional year. A plan-period that runs from 2016 to 2035 would therefore indicate a need for 15,200 additional homes. Hence, the current, rounded OAN of 800 dwellings per annum continues to appear reasonable and justified over an extended plan period.
- 4.9 However, due to the passage of time and the on-going examination of the plan, it may now not be possible to adopt the plan before the end of 2020. In such circumstances, and in order that the plan extends at least 15 years beyond adoption, it may be considered appropriate to extend the end-date of the plan period to 2036.
- 4.10 In response to the Inspector's Questions 15-18 for the Stage 6 Hearing, Session 27, scheduled for December 2019, further modelling has been undertaken to provide an informed picture of the consequences of altering the plan period to a twenty year period, 2016 to 2036. This represents a direct update to the modelling previously presented in Examination Document EX/103B. The updated analysis shows a more pronounced uplift relative to that applied in calculating the original OAN for the period 2013 to 2032, increasing further where the 2016-based sub-national population projections are used.

---

<sup>16</sup> Zurich Assurance Ltd vs Winchester City Council and South Downs National Park Authority of March 2014

<sup>17</sup> PPG Housing and economic development needs assessments: How should plan makers respond to market signals: Paragraph 020 Reference ID: 2a-020-20140306. Archived document: <https://webarchive.nationalarchives.gov.uk/20190607102654/https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>



**Table 4.1: Adjustments to the Objectively Assessed Need over an alternative period (2016-36)**

	2013-32	2016-36	
	Current OAN	2014-based SNPP	2016-based SNPP
Starting point	670	650	593*
Adjusted demographic projection	721	715	666
<b>Annualised OAN</b>	<b>800</b>	<b>800</b>	<b>800</b>
Cumulative uplift	19%	23%	35%

Source: Turley and Edge Analytics

\* 2016-based SNPP with 2014-based headship rates

- 4.11 Hence, a 20 year **plan period that runs from 2016 to 2036**, would result in a need for **16,000 additional homes**.
- 4.12 The Inspector in his post-hearing (December 2019) advice note has confirmed that the evidence presented by the Council justifies a Full Objectively Assessed Need of 800 dwellings per annum, and that this requirement is consistent with national policy. Further, that in order to guarantee a plan period of at least 15 years post adoption, the extension of the end date to 2036 and the rolling forward of the start date to 2016 is also justified.

### **Housing Land Supply**

- 4.13 For decision making purposes, the Annual Monitoring Report 2018/19 indicates that Welwyn Hatfield cannot currently demonstrate a 5 Year Land Supply.
- 4.14 An up-to-date housing land supply position is set out in in Table 4.2. This takes account of sites proposed for allocation in the Draft Local Plan 2016<sup>18</sup> together with an updated position on, completions 2016-2019, commitments and windfall allowance.

**Table 4.2: Land supply 2019, Draft Local Plan 2016 sites<sup>19</sup>, windfall allowance, completions and commitments**

Supply	Number of dwellings
Completions (2016-2019)	1,446
Commitments (excluding Local Plan sites)	1,268
Windfall allowance	1,304
Draft Local Plan sites (8,027) + updated capacity through planning permissions/applications (645)	8,672
Small sites (Urban, and not in windfall allowance)	17
<b>Total</b>	<b>12,707</b>

<sup>18</sup> Not including two sites proposed to be removed from the plan following earlier hearing sessions.

<sup>19</sup> Ibid, footnote 6.

- 4.15 This continues to fall short of the OAN for the plan period 2016-2036, with **an indicated shortfall of 3,293 dwellings**.

### **5 year land supply and the Housing Delivery Test**

- 4.16 Section 25 of this Paper considers four strategic options, of which **Option 1 is preferred** for the reasons set out therein. On the basis that this option is taken forward, this would result in an overall land supply position of 15,952 dwellings for the period 2016-2036. This equates to **an average of 798 dwellings per annum target** over a revised 20 year plan period (from 2016/17 to 2035/36)
- 4.17 However, expected delivery means that lower level of completions are forecast for the start of the plan period and pre-plan period (adoption has been assumed to be 2020/21), whilst towards the middle of the plan period delivery is expected to be much higher, and well above target. This is partly due to the need for infrastructure delivery, land availability and other constraints identified for a number of sites which are likely to affect lead-in times and delivery rates.
- 4.18 If a 798 per year target was used across the whole plan period, at the point of adoption housing land supply would be below five years (4.5 years) and the housing delivery test result would be 61% (meaning that presumption in favour of sustainable development would apply).
- 4.19 A stepped target is therefore considered appropriate - with lower delivery rates projected for the pre-plan period and the first three years from adoption (allowing lead-in times for larger sites which account for a significant proportion of the housing supply), followed by an increased target for the remaining 13 years of the plan period (when the larger Strategic Sites are expected to start delivering). The effect of this is set out in the table below.

**Table 4.3: Stepped housing target with a target of 15,953**

Period	Number of years	Annual target (d.p.a.)	Cumulative target
2016/17-2022/23	7	498	3,486
2023/24 - 2035/36	13	959	12,467
Total	20	-	15,953

- 4.20 A stepped target is consistent with National Planning Practice Guidance<sup>20</sup>, which states: *“A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between*

<sup>20</sup> Planning Policy Guidance – Housing Supply and Delivery: Paragraph 021, Reference ID: 68-021-20190722  
<https://www.gov.uk/guidance/housing-supply-and-delivery>

*emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period”*

- 4.21 The target for the 20 years would total 15,953 dwellings meaning that, in line with national planning practice guidance, the planned housing requirement would be met within the plan period.
- 4.22 The housing land supply at adoption in 2020/21 would be 6.1 years (incorporating a 20% buffer and the shortfall since 2016/17) and the housing delivery test result would be 98%.

## 5. Employment Growth

### The context for the submitted Draft Local Plan 2016

- 5.1 The Council's strategy for employment growth is to ensure that as far as possible, Welwyn Hatfield is an attractive place for investment for existing businesses and companies new to the area, helping to create new jobs and training opportunities.
- 5.2 The 2015 Welwyn Hatfield Economy Study Update, ECO/7 considered different scenarios for job growth from 2013 to 2032, based on Experian employment projections and the East of England Forecasting Model (EEFM). As there were significant differences in the structural make-up of the jobs growth figures for each of these scenarios, it was difficult to predict which scenario would provide a more accurate projection of future changes. The study therefore recommended that a hybrid scenario be adopted, by taking the mean of the Experian and EEFM-based scenarios. This hybrid scenario gave a total jobs growth figure of 16,900 for the 2013 to 2032 period. This indicated the (net) need for an increase in floor space for offices, industry and warehousing (B class uses) of 138,000 square metres and equated to a land requirement of 23 hectares<sup>21</sup>.
- 5.3 At the time the Draft Local Plan was prepared in 2016, land within existing and proposed designated employment areas and mixed use sites had been identified to ensure a sufficient supply of employment land was available for the plan period, planning for about 116,400sqm, sufficient to accommodate around 14,500 jobs (in addition to jobs growth in 2013/14).

### Updated Position In 2019

- 5.4 The Planning Inspector presiding over the Local Plan Examination, in relation to the balance between housing and employment growth in the borough as planned for in the emerging Draft Local Plan has stated (in his letter to the Head of Planning dated 24 October 2019, EX/91B):

*"The amount of employment land that you eventually allocate should be related to the accompanying housing proposals that you put forward. Providing the housing requirement that accompanies the employment growth strategy can be met within the land that can be released from the Green Belt, then the amount of new employment land allocated is effectively a political choice. If this is not possible then any aspirations for major employment growth would have to be curtailed."*

---

<sup>21</sup> Table 1, Welwyn Hatfield Borough Council - Cabinet Housing and Planning Panel 13 June 2016

*A situation where employment growth outstrips housing growth, such that the net inflow of commuters into Welwyn/Hatfield increases would not be a sustainable outcome and would not be found sound”.*

### **Updated analysis of forecast need**

- 5.5 Recognising that the context for employment growth in the borough has changed since the Draft Local Plan was prepared, the Council has taken a number of steps to update the evidence base.
- 5.6 In 2019, the Council commissioned its consultants AECOM to update the forecasts for economic growth for the plan period, as submitted, (2013-2032), and for alternative periods. Taking into account the Inspector’s concerns about commuting rates, the Council also asked its consultants to look at the need for jobs resulting from an increase in population over the submitted plan period and the implications for an alternative period.
- 5.7 This update was published as two technical notes in July 2019 that were labelled as ‘Labour Demand Scenarios’ (Examination Document EX/104A) and ‘Population Based Scenario (Examination Document EX/104B).
- 5.8 The labour demand scenario continued the approach set out in the Council’s evidence base for the submitted Draft Local Plan, combining the Experian and EEFM forecasts to produce a Hybrid forecast.
- 5.9 Accepting that opportunities for job creation in the period 2013 to 2018 have now either taken place or have been lost to other areas and that unemployment levels in Welwyn Hatfield are low, the same calculation was carried out for a period commencing in 2018 and ending in 2035 (to reflect the most up to date data-sets available at the time of review). The results of these scenarios are set out below.

**Table 5.1: Labour demand scenarios 2019 (Experian/EEFM hybrid forecast)**

Period	Additional B class jobs	Additional floor space	Additional land
2013-2032 <sup>22</sup>	5,200	116,000m <sup>2</sup>	20ha
2018-2035 <sup>23</sup>	3,700	69,000m <sup>2</sup>	10ha

- 5.10 In order to take account of the Inspector’s comments relating to commuting, the Council also commissioned a population based scenario. This looked at the employment needs arising from the growth in the resident working age population over the plan period who are likely to work in the borough in a B

<sup>22</sup> Tables 4-41, 4-2, 4-3 EX/104A

<sup>23</sup> Tables 6-7, 6-8, 6-9 EX/104A

class use based on current rates. Analysis was then carried out for the period 2018 to 2035.

- 5.11 To inform the examination, this has also been calculated **for the period 2016 to 2036** and the relevant data is shown in the table below.

**Table 5.2: Working age population based scenarios 2019 (B class uses)**

Period	Additional jobs <sup>24</sup>	Additional floor space	Additional land
2013-2032 <sup>25</sup>	3,120	78,600m <sup>2</sup>	14ha
2018-2035 <sup>26</sup>	1,970	49,200m <sup>2</sup>	9ha
<b>2016-2036</b>	<b>2,400</b>	<b>60,210m<sup>2</sup></b>	<b>11ha</b>

- 5.12 The Inspector has confirmed in this post-hearing (December 2019) advice note that the Council's methodology used to produce the revised employment floorspace supply and need forecasts, as set out in Tables 1 and 2 of the 2019 Employment Land Need Assessment and the Council's Explanatory Note<sup>27</sup>, i.e. those summarised by this section of this paper, are 'justified'.

### ***Updated analysis of supply***

- 5.13 The Council has also reviewed the employment land supply position. Monitoring indicates that since 2013, losses have continued and even when balanced against supply through vacant sites, planning permissions and local plan allocations (including Green Belt sites), the indications are that a shortfall will still arise, irrespective of the start/end date of the plan period.
- 5.14 A review of windfall trends and projections, described in more detail within Section 5 of the 2019 HELAA update, indicates that substantial losses of employment land have continued to occur in recent years, primarily due to the permitted development rights regime. To help address this, an Article 4 Direction is proposed for four of the borough's employment areas, and it is anticipated that this will be in place by October 2020. However, even after the Local Plan is adopted and the Article 4 Direction is in place, some on-going windfall losses are still likely to occur.
- 5.15 The following table illustrates that supply, including proposed allocations in existing urban areas, would not meet the forecast need for employment land under any of the forecasts considered.

<sup>24</sup> EX/104B

<sup>25</sup> Tables 2-2, 2-3 EX/104B

<sup>26</sup> Tables 2-4, 2-5, EX/104B

<sup>27</sup> The Council's statement for the Stage 6 Hearing on 17<sup>th</sup> December 2019, Session 28, Employment land need: <https://www.welhat.gov.uk/local-plan/new/examination/view-hearing-sessions/stage6>

**Table 5.3: Employment floorspace supply, need and shortfall – excluding Green Belt Allocations**

Supply type		B1	B2	B8	BMix	Total
Completions	2013/14	329	0	21,637	-7392	14,574
	2014/15	-4,011	2,469	1,397	-1,087	-1,232
	2015/16	-13,851	0	-2,417	5,695	-10,573
	2016/17	-17,340	614	-451	4,754	-12,423
	2017/18	-5,969	160	753	1,475	-3,581
	2018/19	-5,930	79	3,940	-600	-2,511
	<b>Total Completions to 2013-19</b>	<b>-46,772</b>	<b>3,322</b>	<b>24,859</b>	<b>2,845</b>	<b>-15,746</b>
	<b>Total Completions 2016-19</b>	<b>-29,239</b>	<b>853</b>	<b>4,242</b>	<b>5,629</b>	<b>-18,515</b>
Large sites with planning permission	Norton, Bridge Road East	-150	0	0	0	-150
	SDS3 Broadwater Road West (North)	6,300	0	0	0	6,300
	Plots 5000, 5600 Hatfield Business Park	0	0	0	18,000	18,000
	The Holdings, Cole Green Lane	0	0	10,900	0	10,900
	Black Fan Road	7,300	0	0	0	7,300
	Bridgefields	930	0	5,400	0	6,330
Small sites with planning permission (less than 5,000 m2 floorspace change) (as at April 2019)		-8,899	-424	-297	5,382	-4,238
	<b>Total Planning Permissions</b>	<b>5,481</b>	<b>-424</b>	<b>16,003</b>	<b>23,382</b>	<b>44,442</b>
Vacant sites	Land N of Chequersfield (was 22,600sqm)	0	0	0	0	0
	Tewin Road Gasholders	9,200	0	0	0	9,200
	<b>Total Vacant</b>	<b>9,200</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9,200</b>
Local Plan Allocations - Urban (without permission)	SDS4 Broadwater Road West (South West)	11,250	0	-9,500	0	1,750
	HS4 Ratcliff Tail Lift Site, Bessemer Road	0	-7,850	0	0	-7,850
	HS14 L Kahn Manufacturing	0	-4,410	0	0	-4,410
	<b>Total Local Plan Allocations - Urban</b>	<b>11,250</b>	<b>-12,260</b>	<b>-9,500</b>	<b>0</b>	<b>-10,510</b>
Estimated office-to-resi loss (Windfall)	2013/14 - 2031/32	-18,120	0	0	0	-18,120
	2016/17 - 2034/35	-21,900	0	0	0	-21,900
	2016/17 - 2035/36	-23,160	0	0	0	-23,160
<b>Total Supply (excluding Green Belt Allocations)</b>	<b>Plan period 2013/14 - 2031/32</b>	<b>-38,961</b>	<b>-9,362</b>	<b>31,362</b>	<b>26,227</b>	<b>9,266</b>
	<b>Plan period 2016/17 - 2034/35</b>	<b>-25,208</b>	<b>-11,831</b>	<b>10,745</b>	<b>29,011</b>	<b>2,717</b>
	<b>Plan period 2016/17 - 2035/36</b>	<b>-26,468</b>	<b>-11,831</b>	<b>10,745</b>	<b>29,011</b>	<b>1,457</b>
<b>Total Need (Population Based)</b>	<b>Plan period 2013/14 - 2031/32</b>	<b>35,400</b>	<b>4,000</b>	<b>39,200</b>	<b>0</b>	<b>78,600</b>
	<b>Plan period 2016/17 - 2034/35</b>	<b>25,800</b>	<b>2,880</b>	<b>28,700</b>	<b>0</b>	<b>57,380</b>
	<b>Plan period 2016/17 - 2035/36</b>	<b>27,230</b>	<b>2,880</b>	<b>30,100</b>	<b>0</b>	<b>60,210</b>
<b>Shortfall (excluding Green Belt Allocations)</b>	<b>Plan period 2013/14 - 2031/32</b>	<b>-74,361</b>	<b>-13,362</b>	<b>-7,838</b>	<b>26,227</b>	<b>-69,334</b>
	<b>Plan period 2016/17 - 2034/35</b>	<b>-51,008</b>	<b>-14,711</b>	<b>-17,955</b>	<b>29,011</b>	<b>-54,663</b>
	<b>Plan period 2016/17 - 2035/36</b>	<b>-53,698</b>	<b>-14,711</b>	<b>-19,355</b>	<b>29,011</b>	<b>-58,753</b>

- 5.16 Even when Green Belt sites proposed for allocation in the Draft Local Plan 2016 are taken into account, (**Table 5.4**), a **projected shortfall of 4,353 square metres** for a plan period of **2016-2036, equating to 0.80 ha**, exists.

**Table 5.4: Employment floorspace supply, need and shortfall – including Green Belt allocations in the Draft Local Plan 2016**

Supply type		B1	B2	B8	BMix	Total
Total Supply - as above (without Green Belt Allocations)	Plan period 2013/14 - 2031/32	-38,961	-9,362	31,362	26,227	9,266
	Plan period 2016/17 - 2034/35	-25,208	-11,831	10,745	29,011	2,717
	Plan period 2016/17 - 2035/36	-26,468	-11,831	10,745	29,011	1,457
Local Plan Allocations - Green Belt	SDS5 North West Hatfield	13,900	0	0	0	13,900
	SDS7 Marshmoor	40,500	0	0	0	40,500
	<b>Total Local Plan Allocations - Green Belt</b>	<b>54,400</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>54,400</b>
<b>TOTAL SUPPLY (including Green Belt Allocations)</b>	Plan period 2013/14 - 2031/32	<b>15,439</b>	<b>-9,362</b>	<b>31,362</b>	<b>26,227</b>	<b>63,666</b>
	Plan period 2016/17 - 2034/35	<b>29,192</b>	<b>-11,831</b>	<b>10,745</b>	<b>29,011</b>	<b>57,117</b>
	Plan period 2016/17 - 2035/36	<b>27,932</b>	<b>-11,831</b>	<b>10,745</b>	<b>29,011</b>	<b>55,857</b>
<b>Total Need (Population Based)</b>	Plan period 2013/14 - 2031/32	<b>35,400</b>	<b>4,000</b>	<b>39,200</b>	<b>0</b>	<b>78,600</b>
	Plan period 2016/17 - 2034/35	<b>25,800</b>	<b>2,880</b>	<b>28,700</b>	<b>0</b>	<b>57,380</b>
	Plan period 2016/17 - 2035/36	<b>27,230</b>	<b>2,880</b>	<b>30,100</b>	<b>0</b>	<b>60,210</b>
<b>Shortfall (including Green Belt Allocations)</b>	Plan period 2013/14 - 2031/32	<b>-19,961</b>	<b>-13,362</b>	<b>-7,838</b>	<b>26,227</b>	<b>-14,934</b>
	Plan period 2016/17 - 2034/35	<b>3,392</b>	<b>-14,711</b>	<b>-17,955</b>	<b>29,011</b>	<b>-263</b>
	Plan period 2016/17 - 2035/36	<b>702</b>	<b>-14,711</b>	<b>-19,355</b>	<b>29,011</b>	<b>-4,353</b>

- 5.17 Furthermore, a number of sites promoted for residential development through the Call for Sites 2019 include some land currently in employment use, which if allocated (or given planning permission) would result in an even greater shortfall.
- 5.18 Only a small number of sites promoted for employment related uses and were found suitable for allocation (as part of mixed use schemes). **Table 5.5** illustrates the effect if all of these sites were to now be allocated for housing (or mixed-use development) in addition to those sites already proposed for allocation in the Draft Local Plan for employment floorspace supply.



**Table 5.5: Employment floorspace supply, need and shortfall – including Green Belt allocations and urban and Green Belt sites promoted through the Call for Sites 2019**

Supply type		B1	B2	B8	BMix	Total
<b>TOTAL SUPPLY</b> (As above, including Green Belt Allocations)	Plan period 2013/14 - 2031/32	15,439	-9,362	31,362	26,227	63,666
	Plan period 2016/17 - 2034/35	29,192	-11,831	10,745	29,011	57,117
	Plan period 2016/17 - 2035/36	27,932	-11,831	10,745	29,011	55,857
<b>Call for Sites 2019</b>	BrP34 - Brookmans Park Transmitting Station	10,623	0	0	0	10,623
	Pea 102 - Bio Park, Broadwater Road	-11,071	0	0	0	-11,071
	Pea 105 - 61 Bridge Road East	0	0	0	-1,140	-1,140
	Pea 103 - 29 Broadwater Road*	0	0	0	0	0
	Pea 106 - 73 & 83 Bridge Road East	1653	-4560	0	0	-2,907
	WE100 - 51-53 London Road	0	0	0	0	0
	<b>Total Call for Sites 2019 - Proposed Allocations</b>	<b>1,205</b>	<b>-4,560</b>	<b>0</b>	<b>-1,140</b>	<b>-4,495</b>
<b>TOTAL SUPPLY</b> (including loss through Call for Sites 2019)	Plan period 2013/14 - 2031/32	16,644	-13,922	31,362	25,087	59,171
	Plan period 2016/17 - 2034/35	30,397	-16,391	10,745	27,871	52,622
	Plan period 2016/17 - 2035/36	29,137	-16,391	10,745	27,871	51,362
<b>Total Need</b> (Population Based)	Plan period 2013/14 - 2031/32	35400	4000	39200	0	78,600
	Plan period 2016/17 - 2034/35	25800	2880	28700	0	57,380
	Plan period 2016/17 - 2035/36	27230	2880	30100	0	60,210
<b>Shortfall</b> (including Green Belt Allocations)	Plan period 2013/14 - 2031/32	-18,756	-17,922	-7,838	25,087	-19,429
	Plan period 2016/17 - 2034/35	4,597	-19,271	-17,955	27,871	-4,758
	Plan period 2016/17 - 2035/36	1,907	-19,271	-19,355	27,871	-8,848

\* Note 1: Loss for this site -3,925sqm is included within the small sites with planning permission.

\* Note 2: Site not in a primary B class use, hence floorspace loss not noted in this table

### ***Site Selection – balancing the need for housing land supply and the needs of the economy***

- 5.19 The needs of the economy are important to the objective of achieving sustainable development in the borough and given the updated position on the indicators for employment growth and supply (above), the Council is keen to ensure the balance doesn't unduly shift to indicate a significant undersupply of employment land as this could also be unsustainable.
- 5.20 Therefore, by trying to keep up with the population projection, a need for 60,210 square metres of employment land as indicated in Table 5.2 should be considered as a reasonable, and a minimum, baseline for the new plan period.

- 5.21 However, in the context of the need to explore if the OAN for housing could be met in full, and in order to facilitate a wider consideration of sites promoted for housing, in the 2019 HELAA (Stage 1 and 2 of the site selection process), employment sites were no longer automatically sieved out at Stage 1, as they were in the 2016 HELAA, simply because of their location within a designated or proposed employment policy area.
- 5.22 Sites promoted for employment (B class) uses and mixed-use sites have also been assessed in the 2019 HELAA.
- 5.23 As part of the subsequent stages of the site selection process (i.e. as set out in this Paper), a pragmatic approach has been taken in terms of the balance to be struck between the need for housing and the needs of the economy, including consideration of the potential use of employment sites to accommodate housing growth, where it is necessary to consider a range of options for how the Council meets its housing requirement in full.

***Impact of the site selection process on employment land supply***

- 5.24 Where account is taken of completions, large sites with planning permission, small sites with planning permission, vacant sites, Draft Local Plan urban and Green Belt sites (without planning permission), estimated windfall losses, and the additional loss of a limited number of employment sites to housing (or mixed-use) to assist in meeting the OAN for housing (as set out in Table 5.5), a shortfall in employment land is anticipated to arise, and assuming that the sites identified are developed in full during the plan period.
- 5.25 On this basis, an overall shortfall of 8,848sqm, for a plan period of 2016-2036, is estimated, which equates to a shortfall of around 1.63 ha of employment land.

**Table 5.6: Employment growth including the loss of a limited number of employment sites for housing to assist in meeting the OAN**

Period	Additional jobs	Additional floor space	Additional land
2016-2036	-350	-8,848sqm	-1.63ha

## 6.0 **Exceptional Circumstances**

6.1 The NPPF (2012) states (at paragraph 84) that when drawing up or reviewing Green Belt boundaries, local planning authorities should:

*“...take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable patterns of development of channelling development towards the urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*

6.2 The NPPF also goes on to provide guidance for defining boundaries at Paragraph 85, where local planning authorities should:

- “ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development,
- Not include land which it is unnecessary to keep permanently open,
- Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period,
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development,
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period, and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

6.3 As set out in the Council’s hearing statement in response to Question 5 of the Stage 2 Hearing Sessions, there is no definition of what constitutes exceptional circumstances either in the NPPF or in national Planning Practice Guidance. It is a matter of planning judgement. This is reinforced by a recent High Court decision (*Compton Parish Council (and others) Vs Guildford BC (and others)*)<sup>28</sup> where the judgement states:

*“There is no definition of the policy concept of “exceptional circumstances”. This in itself is a deliberate policy decision, demonstrating that there is a planning judgement to be made in all the circumstances of a particular case ...”*

---

<sup>28</sup> [2019] EWHC 3242 (Admin), case no. CO/2173,2174, 2175/2019

- 6.4 The *Compton* judgement also clarifies that ‘Exceptional Circumstances’ can be found in the accumulation or combination of circumstances, of varying natures, entitling a decision-maker to make a rational planning judgement, i.e. that circumstances are sufficiently exceptional to justify altering the Green Belt boundary.
- 6.5 The steps that might lead a planning authority to conclude that exceptional circumstances exist have also been considered by the courts. The *Compton* case clarifies that unmet need is often part of the judgement and it may weigh heavily or decisively but it is not sufficient in itself as such factors do not exist in a vacuum. There will also need to be an analysis of the nature and degree of the need, together with a consideration of why the need cannot be met in sequentially preferable locations, the impact on the function and purpose of the Green Belt and what other advantages proposed released from the Green Belt might bring, e.g. in terms of a sound distribution strategy.
- 6.6 The frequently cited case of *Calverton Parish Council v Nottingham City Council* (and others) 2015 EWHC 1078 (Admin)<sup>29</sup> confirms that decision makers are entrusted with the obligation of reaching sound planning judgements on whether exceptionality exists and in doing so regard must be had to the whole picture, including the consequences for sustainable development.
- 6.7 In this case, the judgement set out a number of matters that should be identified and dealt with in order to ascertain whether ‘exceptional circumstances’ exist to justify amending the Green Belt:
- i. The acuteness of the Objectively Assessed Need,
  - ii. The inherent constraints on supply and availability of land for sustainable development,
  - iii. The consequent difficulties in achieving sustainable development without impinging on the Green Belt,
  - iv. The nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
  - v. The extent to which the consequent impacts on the purposes of the Green Belt maybe ameliorated or reduced to the lowest reasonably practicable extent.
- 6.8 It is generally considered that in making the case for exceptional circumstances points (i), (ii), and (iii) are relevant at a general/strategic level, whilst points (iv) and (v) require consideration of the specific areas or settlement proposed to be released from the Green Belt. On this basis, the Council’s consideration of

---

<sup>29</sup> <http://www.bailii.org/ew/cases/EWHC/Admin/2015/1078.html>

points (i) to (iii) are summarised in this paper within this section. Points (iv) and (v) are considered on a site-by-site, and settlement basis and are summarised in the site assessment templates (**Appendix A**) and the settlement sections of this paper (Sections 10 to 24).

## Housing

- 6.9 **Acuteness of the OAN:** Welwyn Hatfield's full OAN for housing of 664-707 dwellings per annum (dpa), equivalent to 12,616 to 13,433 dwellings over a 19 year plan period 2013-2032 at the time the Draft Local Plan 2016 was prepared, indicated the need for a significant increase in the number of homes in the borough to address the housing needs of the population including an uplift to address market signals and suppressed household formation.
- 6.10 The Strategic Housing Market Assessment Update 2017 (HOU/21), indicated<sup>30</sup> population and household change of 23.5% and 27.4% over the plan period, which in itself can be described as acute. Table 6.1 of HOU/21, indicated a 19% uplift above the demographic starting point to arrive at the **full OAN of 800dpa** (allowing for a recovery in household formation rates of younger households, supporting likely job creation through growth in the labour force and to provide a reasonable response to market conditions through increased supply). This reinforced the acute need for housing in Welwyn Hatfield.
- 6.11 A technical note (Examination Document EX/103A) was more recently prepared (June 2019) to consider the implications of the 2016-based population and household projections on the OAN<sup>31</sup>. The conclusion of this work was that **the OAN of 800dpa remains reasonable and appropriate for Welwyn Hatfield** following the applicable NPPF and PPG.
- 6.12 The Council's Statement for the Stage 6 Hearing (Session 27) on Housing Need Forecasts, acknowledges that the plan may now not be adopted before the end of 2020. In order to provide an informed picture as to the consequences of altering the plan period to a twenty year period 2016 to 2036, updated modelling has been carried out. Table 6.1 presents a projection for an alternative plan-period, 2016 to 2036. This continues to show a slightly more pronounced uplift relative to that applied in calculating the original OAN (2013-32), increasing further where the 2016-based SNPP are used.

---

<sup>30</sup> Table 4.1 of HOU/21 Welwyn Hatfield SHMA Update 2017

<sup>31</sup> Supplementary to Examination Document EX/82, a technical note prepared in response to matters raised by the Inspector at the Stage 2 hearings in 2017

**Table 6.1: Adjustments to the Objectively Assessed Need over an alternative period (2016-36)**

	2013-32	2016-36	
	Current OAN	2014-based SNPP	2016-based SNPP
Starting point	670	650	593*
Adjusted demographic projection	721	715	666
<b>Annualised OAN</b>	<b>800</b>	<b>800</b>	<b>800</b>
Cumulative uplift	19%	23%	35%

Source: Turley and Edge Analytics

\* 2016-based SNPP with 2014-based headship rates

- 6.13 The Council considers that the 800dpa identified in the 2017 SHMA (and the additional Technical Papers which have been prepared and published following the Stage 2 hearings in October 2017) remains the most appropriate calculation of the annual need for housing. The increased uplift facilitated by the retained OAN of 800dpa is considered to be a reasonable and positive response to the consequences of under-provision over the period from the original base date (2013) to a new base date (2016), specifically including a recognition of worsening affordability.
- 6.14 All iterations of the evidence around the need for housing indicate an acute need for housing growth exists.
- 6.15 The Inspector in his post-hearing (December 2019) advice note has confirmed that the evidence presented by the Council justifies a Full Objectively Assessed Need of 800 dwellings per annum, and that this requirement is consistent with national policy.
- 6.16 **Constraints on supply and land availability:** The Council has prepared a proportionate evidence base and has reviewed the opportunities for maximising development potential within the borough's urban areas.

### ***Housing land supply***

- 6.17 Without Green Belt release, the indicated additional housing supply in the Draft Local Plan 2016 represented only 49%-52% of the OAN at the time of the Reg. 19 consultation. This represented a considerable constraint on land supply when compared to the assessed need for housing at that time.
- 6.18 An updated land supply position (2019) indicates the following (assuming the sites in the Draft Local Plan 2016 are carried forward):

**Table 6.2: Housing land supply 2019, Draft Local Plan 2016 sites, windfall allowance, completions and commitments**

Supply	Number of dwellings
Completions (2016-2019)	1,446
Commitments (excluding Local Plan sites)	1,268
Windfall allowance	1,304
Draft Local Plan sites (8,027) + updated capacity through planning permissions/applications (645)	8,672
Small sites (Urban, and not in windfall allowance)	17
<b>Total</b>	<b>12,707</b>

- 6.19 This falls short of the OAN for the plan period 2016-2036 (16,000), with **an indicated shortfall of 3,293 dwellings**.
- 6.20 The results of the site selection work completed in 2019, indicates a potential additional supply position from the **urban areas** of **1,287** dwellings. Assuming all of these sites are allocated, then together with the updated housing land supply position illustrated above in Table 6.2, this results in a total capacity of 13,994.
- 6.21 This is considerably below the OAN of 16,000, **indicating a shortfall of 2,006** dwellings and represents a severe constraint on supply and land availability. Opportunities have also been identified to amend the capacity of a number of sites (including Green Belt sites) in the Draft Local Plan 2016, the net effect of this would result in **an additional capacity of 239 dwellings**, potentially increasing supply to **14,233**, and **reducing the shortfall to 1,767**.
- 6.22 The shortfall against the OAN that arises can **only** be addressed through the release of additional land from the Green Belt.
- 6.23 Following the detailed review of the additional sites, as summarised by this Topic Paper, it is proposed that 77 sites are allocated to deliver, along with completions, commitments and an allowance for windfall sites, **15,952 dwellings**. Forty-nine of these proposed allocations are Green Belt sites, clearly illustrating the difficulty for the Council seeking to meet the OAN without releasing Green Belt sites.
- 6.24 Indeed, the proposed housing supply of 15,952 dwellings in the plan period 2016 – 2031 falls just 48 dwellings short of the OAN. As explained more in Section 26 of this Topic Paper, 15,952 dwellings represents the maximum level of housing that can be provided utilising all sites that pass the Council's

comprehensive approach to site selection, less those sites that would lead to 'high' Green Belt harm.

## **Employment**

### ***Acuteness around the need for employment land***

- 6.25 As highlighted in section 5 of this paper, the employment needs arising from the growth in the resident working age population over the plan period who are likely to work in the borough in a B class use, is predicted to lead to a **requirement for an additional 60,210 square metres of floorspace**, equivalent to **around 11ha** over a plan period of 2016 to 2036 (i.e. a population based scenario).
- 6.26 Monitoring indicates that in recent years, losses of employment land have been significant. Overall (net) losses can however mask certain trends. Significantly, between 2013 and 2019, a loss of 46,772 square metres of B1 floorspace has been recorded (29,239 square metres of which was lost in the last 3 years, between 2016 and 2019). Much of this can be attributed to permitted development rights on 'windfall' sites, which allow sites in office use to be re-developed for residential purposes. Since PD rights were introduced, 29,853 square metres of B1a office floorspace has been lost (with 435 dwellings permitted).
- 6.27 Whilst the Council is introducing an Article 4 Direction to protect a number of employment sites, there are still expected to be further employment land losses in the plan period (a projected loss of 23,160qm between 2023/24 and 2035/36 on windfall sites). Permitted development rights aside, further losses of employment land are also likely to be the case in the absence of an up to date adopted Local Plan or a 5 year land supply for housing. The level of existing sites with planning permission and vacant sites will not be enough to offset losses.

### ***Constraints on supply and land availability***

- 6.28 Without any allocations from Green Belt sites, **a shortfall of 58,753 square metres** of employment floorspace is anticipated to arise, when compared to the population based scenario for the plan period 2016-2036 (Table 5.3 Section 5). This equates to around 10.8 hectares. Clearly, this is an acute shortfall, which left unaddressed could impact on the ability for business to remain in or locate to Welwyn Hatfield.
- 6.29 The NPPF (2012) places significant weight on the need to support economic growth. Planning authorities should plan proactively to meet the



development needs of business, positively and proactively encouraging sustainable economic growth to meet anticipated needs over the plan period, allowing for flexibility for changes in economic circumstances, whilst avoiding the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose<sup>32</sup>.

- 6.30 In 2016, the need to provide for sufficient employment land in the borough for the plan period resulted in proposals to release a limited amount of land from the Green Belt at two mixed use sites SDS5 (Hat1) and SDS7 (WeG4b). (In addition, a number of employment areas were proposed in Policy SADM10 of the Draft Local Plan 2016).
- 6.31 More recent reporting indicates<sup>33</sup> that there is a healthy underlying demand in both the office and industrial sectors across Hertfordshire. There is however a lack of supply to meet those demands. The permitted development rights regime has had a significant impact on the office sector, which is creating imbalances between supply and demand in the market. The implications for the economy include the potential to constrain growth, lost inward investment, limits to productivity and the risk that the area may not been seen as ‘open for business’.
- 6.32 Even with the Green Belt sites proposed for allocation in the Draft Local Plan 2016, **a shortfall of 4,353 square metres (equivalent to around 0.80ha) is currently indicated** (for a plan period of 2016-2032 and for an updated population based scenario 2019).
- 6.33 If, as a result of the need to identify more sites for housing, further losses of land currently in employment use were to be planned for (i.e. those relevant sites promoted through the Call for Sites 2019 that were found to be suitable, available and achievable for housing or mixed use development and also suitable for allocation), as set out in this paper and recommended as the ‘Preferred Option’; then the **overall shortfall would increase to around 1.63 ha** (where the shortfall is indicated at around 8,848 square metres).
- 6.34 This ‘Preferred Option’ maximises the Council’s ability to meet the OAN and achieve a reasonable balance between housing and employment. Clearly this is a key component of achieving sustainable development and a requirement and a key consideration of the NPPF in terms of demonstrating ‘exceptional circumstances’. The Council therefore considers that the release of Green Belt

---

<sup>32</sup> Paragraphs 18 to 22 of the NPPF 2012

<sup>33</sup> Loss of Employment Space in Hertfordshire, February 2019, Hertfordshire Local Enterprise Partnership

land is both essential and unavoidable to support the achievement of sustainable development and, as an exceptional case, to provide land supply to help meet the needs of the economy over the plan period.

### **The difficulties of achieving sustainable development without imposing on the Green Belt**

6.35 There are three dimensions to sustainable development<sup>34</sup> and the planning system performs a number of roles:

- **An economic role** – contributing to building a strong economy, ensuring that sufficient land is available of the right type, in the right place at the right time; identifying and coordinating development requirements including the provision of infrastructure.
- **A social role** - supporting communities, providing housing to meet existing and future generations with accessible local services that reflect the community's needs and support its wellbeing.
- **An environmental role** - contributing to protecting and enhancing our natural, built and historic environment, helping to improve biodiversity and use natural resources prudently

6.36 The presumption in favour of sustainable development lies at the heart of the National Planning Policy Framework (paragraph 14, 2012).

*“For **plan making**, this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or*
  - *Specific policies in the Framework indicate that development should be restricted.*<sup>9</sup> <sup>35</sup>

---

<sup>34</sup> Paragraph 7 of the NPPF.

<sup>35</sup> Footnote 9: NPPF: “For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.”

- 6.37 The policies of the Framework referenced in Footnote 9 of the NPPF include those relating to the Green Belt (amongst others). This is not the end of the matter however, for the policies in the NPPF must be read as a whole.
- 6.38 Whereas paragraph 119 of the NPPF categorically states that the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined, no such categorical statement is made in the context of “*land designated as Green Belt*”.
- 6.39 The NPPF envisages the circumstances in which Green Belt boundaries will be altered, i.e. in exceptional circumstances through the preparation or review of a Local Plan (paragraph 83). Further, when drawing up or reviewing boundaries, planning authorities should take account of the need to promote sustainable patterns of development (paragraph 84).
- 6.40 Not imposing on the Green Belt in Welwyn Hatfield would have a number of consequences for sustainable development and would mean that the plan would fail to:
- boost significantly the supply of housing for existing and future generations, for which an acute needs exists,
  - plan for or meet the full OAN or the identified requirement for employment provision,
  - plan positively for economic growth, allowing for changes in the economy and businesses to remain, grow and locate in the borough,
  - ensure there is a balance between housing and employment planned for in order to deliver sustainable development,
  - adequately plan for and coordinate the delivery of infrastructure alongside growth (noting that a number of Strategic Development Sites that are currently designated within the Green Belt, will be the key delivery locations for new primary and secondary school provision and other services and facilities),
  - support a sustainable pattern of development, consistent with the Spatial Strategy and Settlement Hierarchy (as advocated by the NPPF at Paragraph 84) where the Council’s proposed approach does:
    - channel development first towards the urban areas, particularly at the main towns of Welwyn Garden City and Hatfield, and

- towards towns and villages inset within the Green Belt, particularly the larger and most sustainable villages, such as Welwyn and Welham Green.
- 6.41 The plan cannot direct development towards locations beyond the outer Green Belt boundary as the Green Belt extends across the whole borough. However, development is also directed towards a proposed new village (Symondshyde) that is located where impact on the Green Belt is 'low - moderate' and in order to support a sustainable pattern of development and help to reduce the impact on the other existing settlements.
- 6.42 The Council has taken into account the need to protect and enhance the borough's natural and historic assets where these are of acknowledged importance, e.g. Registered Historic Parks and Gardens, and allowances have been made for mitigation measures where considered necessary, along with a wide range of constraints and factors considered through the site selection process.
- 6.43 Finally, the Council's approach has avoided the need to identify any additional sites that fall within 'high' harm parcels in the Green Belt, thus seeking to minimise impact. The additional sites identified, if developed, would not lead to undue impact on the purposes of the Green Belt or on separation between settlements.
- 6.44 The Council therefore maintains that exceptional circumstances exist to alter Green Belt boundaries in Welwyn Hatfield in order to meet the need for housing and economic growth, which cannot be met in urban areas alone. It would be impossible for the Council to plan for sufficient housing, employment and infrastructure or to support the delivery of sustainable development without releasing sites from the Green Belt.

#### **The nature and extent of the harm to the Green Belt if boundaries are reviewed**

- 6.45 The Council has used a proportionate evidence base to objectively consider the nature and extent of the harm to the Green Belt if boundaries are altered. Topic Paper 2 (TPA/2) set out the evidence and approach taken to inform the assessment of Green Belt harm at that point in time.
- 6.46 This Site Selection Paper provides an updated position, taking into account the key conclusions arising from more recent evidence, including The Green Belt Study (Stage 3).

- 6.47 This matter is considered on a site-by-site basis, as set out in the site templates (**Appendix A**) within this paper, that takes into account the nature and extent of harm to the Green Belt if boundaries are reviewed. Consideration is also given to this at settlement level, as summarised in Sections 10 to 24 of this paper.

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

- 6.48 The Council has assessed the implications of removing land from the Green Belt against the purposes of including land within it and has sought to limit the harm to lowest reasonable extent. This matter is considered on a site-by-site basis, as set out in the site templates (**Appendix A**) within this paper, that takes into account the nature and extent of harm to the Green Belt if boundaries are reviewed. Consideration is also given to this at settlement level, as summarised in Sections 10 to 24 of this paper.
- 6.49 A limited release of land from the Green Belt, arising from the recommendations contained in this paper would mean that 74.2% of the borough would remain Green Belt, with the remaining 25.8% forming urban areas.
- 6.50 The reduction from 79.1% of the borough designated as Green Belt to 74.2%, is the lowest reasonable extent required to address the needs for housing and employment growth alongside the infrastructure, services and facilities necessary to support the level of growth proposed, whilst protecting the borough's most sensitive environment.

## 7. Methodology

- 7.1 The Council's methodology for assessing sites for inclusion within its local plan, as submitted in May 2017, is set out in the Housing Sites Selection Background Paper 2016<sup>36</sup>. This paper, updated October 2019, outlines the methodology for assessing sites for consideration by the Planning Inspector presiding over the WHBC Local Plan Examination. In his correspondence dated December 2017, the Inspector invited the Council to consider a wider range of sites to see if a higher level of housing could be planned for<sup>37</sup>. This is discussed in more detail in the introductory sections of this paper.
- 7.2 As explained in Section 3 of this paper, the Council's approach to identifying sites for inclusion within the local plan is consistent with National Planning Practice Guidance (PPG). The approach consists of six main steps that incorporate the requirements set out in PPG. In particular, the Council's Housing and Economic Land Availability Assessment 2016 (HELAA), forms the first part of the approach, by identifying a short-list of potential development sites for more detailed consideration.
- 7.3 **Table 7.1** summarises the six steps of the Council's site selection methodology and also how many sites were considered at each stage. This shows that the first stage of the process considered **144** sites and at the end of stage 6, **78** sites are recommended for inclusion within the plan.
- 7.4 It should be noted that evidence to justify the inclusion of sites in the local plan, as submitted in May 2017, was set out in background papers supporting the original plan at the point of submission that are available on the Council website<sup>38</sup>. In responding to the Planning Inspector's instructions to consider additional potential development sites, this paper considers all sites again, comprehensively, including sites included in the plan at submission, new sites identified through the 'call-for-sites' undertaken earlier in 2019 and re-submitted sites, that were considered as part of preparing the original plan, but that were re-submitted through the recent 'call-for-sites' consultation.
- 7.5 The Council's site selection methodology ensures that a range of evidence or appraisals are used to inform the selection of sites for possible inclusion in the plan, following completion of the HELAA, initially at a site-by-site assessment level (Stage 3 – Detailed Assessment) and then a settlement level assessment (Stage 4 – Settlement Assessment) and an assessment of

---

<sup>36</sup> HOU20 Housing Site Selection Background Paper 2016

<https://www.welhat.gov.uk/local-plan/new/examination/library>

<sup>37</sup> EX39 Inspector's Note following Stages 1 and 2 of the hearing sessions: Green Belt Review

<https://www.welhat.gov.uk/local-plan/new/examination/documents>

<sup>38</sup> HOU20 Housing Site Selection Background Paper 2016

<https://www.welhat.gov.uk/local-plan/new/examination/library>

strategic options (Stage 5 – Detailed Options Testing). The evidence or appraisals used to inform the process include:

- **Housing and Economic Land Availability Assessment (HELAA)**

The HELAA involves a thorough strategic level assessment of whether a site is considered suitable, available and achievable during the plan period. Only sites that are considered suitable in the HELAA have been included in this Site Selection Background Paper (if they are considered unsuitable, then the HELAA sets out the reasons why this conclusion has been reached).

Many sites have a number of constraints that need to be overcome before development can proceed. The HELAA considers whether such constraints can be overcome, whether constraints may reduce or limit the quantum of development in any way, whether any further assessments may need to be carried out either before or in association with a planning application and whether such constraints may affect achievability.

- **The Green Belt Study (Parts 1, 2 and 3)**

The Council has followed a comprehensive approach to assessing the Green Belt with three stages of work being completed. The Stage 1 work was jointly commissioned with neighbouring authorities in 2013 and provided a strategic level assessment. The Stage 2 work, completed in 2014, provided a finer grain analysis of WHBC sites on an individual basis, whereas the Stage 3 work, completed in 2019, provided further analysis. This included all parcels surrounding the borough's settlements, including those washed-over by the Green Belt, along with the degree of harm that release of any individual parcel or sub-parcel, would have on the Green Belt.

- **An appraisal of Green Belt boundaries**

The Green Belt Study Stage 2 provided an initial assessment of Green Belt boundaries and the Stage 3 work provided a more comprehensive and detailed assessment of the existing Green Belt boundaries for each sub-parcel considered. This work informed an assessment by officers of boundaries associated with the proposed development sites.

- **Consideration for the Calverton Test**

The High Court Judgement of Justice Jay in the case of Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 (Admin), set out a number of matters that should be considered in order to ascertain whether 'exceptional circumstances' exist to justify making amendments to the Green Belt. These matters have been considered on a site-by-site basis and at a

settlement level, which are presented in **Appendix A** and in the Settlement Sections (Sections 10 to 24) of this paper respectively. There is also an overview at a borough level provided by Section 6.

- **The Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)**

The Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), is a legal requirement to inform plan making. The Council commissioned independent consultants to undertake SA/SEA to inform the Local Plan. The SA/SEA is prepared iteratively and tests the plan proposals against a series of 'sustainability' objectives in order to ascertain if any significant effects are 'likely' as a result of taking the proposals forward. The SA was prepared iteratively alongside preparation of this Topic Paper and the findings are reported in the SA Report<sup>39</sup>.

The Habitats Regulations Assessment (HRA) is another legal requirement of the plan making process and considers if the plan will have an impact on European designated wildlife sites, such as Special Areas of Conservation. An update to the HRA was prepared alongside and to inform this Topic Paper<sup>40</sup>.

- **Flood Risk – Sequential Test**

Flood risk has been tested comprehensively with work undertaken in 2015, 2016 and 2019. The Strategic Flood Risk Assessment (SFRA) takes account of Government guidance and accords with the requirements of the Environment Agency. This evidence is taken into account within the HELAA and so any sites considered at Stage 3 (Detailed Assessment) will have been shown to pass the SFRA.

- **Landscape Sensitivity Study**

The Landscape Sensitivity Study was undertaken to provide a robust assessment of the borough by landscape character area and to complement the Green Belt studies, as protecting sensitive landscapes is not one of the purposes of the Green Belt as set out in national policy. The study concentrated on understanding the sensitivities to residential development of

---

<sup>39</sup> <https://www.welhat.gov.uk/evidencebase>

<sup>40</sup> <https://www.welhat.gov.uk/evidencebase>



land across the borough apart from settlements large enough to be inset, or areas that have absolute constraints that preclude development, such as Ancient Woodland or Historic Parks and Gardens. The study was used to inform the site selection process and is available on the Council's website<sup>41</sup>.

- **Green Gap Assessment 2019**

The Green Gap Assessment provides an additional evidence base to assist the Council's Site Selection process. The Assessment considers the role gaps play between settlements, for example by providing a sense of separation and in maintaining settlement pattern and character.

- **Transport Assessment**

The Council has worked closely with the County Council, who as Highways Authority have responsibility for highway related matters in Hertfordshire who also work in partnership with Highways England, in relation to the Strategic Highway network, i.e. the A1 (M)<sup>42</sup>. Consultants were commissioned to prepare updated transport evidence testing the impact of additional development and ensuring that any proposals were both compliant with national policy, and where necessary, that appropriate infrastructure improvements had been identified.

- **An appraisal of strategic advantages or disadvantages**

Consideration is given to any strategic advantages or disadvantages to bringing individual sites forward, either as promoted by those parties acting for the landowner, or by other stakeholders such as the County Council. An example might include the potential for the site to include a new school or community facility.

- **Strategic infrastructure and cumulative impacts**

In addition to the various technical work described above, the Council also consulted with a range of stakeholders, including the County Council and infrastructure providers to ensure that any strategic or cumulative impacts are taken into account. These are reported within the settlement sections (Sections 10 to 24) of this paper.

---

<sup>41</sup> EX156 Welwyn Hatfield Landscape Sensitivity Assessment July 2019

<https://www.welhat.gov.uk/local-plan/new/examination/documents>

<sup>42</sup> <https://www.welhat.gov.uk/evidencebase>

- 7.6 The methodology is consistent with earlier stages of plan making, including to inform the plan at submission, but is refined to ensure that matters arising through the Local Plan Examination process have been incorporated, and to ensure the Council's selection of any additional sites is made as clear and transparent as possible.
- 7.7 Section 8 of this paper discusses the evidence and appraisals that inform the selection process in more detail.
- 7.8 Section 9 of this paper discusses how the findings from different parts of the assessment, including the evidence and appraisals, have been weighted. This helps to ensure a consistent approach is applied to all the sites considered. It is also important to note that the approach to weighting is used to guide the assessment, but that this has also been balanced with any site-specific considerations.
- 7.9 Following Stage 2 (the HELAA) only sites of 5 or more dwellings in the excluded villages (i.e. those inset from the Green Belt) or 10 or more dwellings in the towns were considered at Stage 3, as these are considered too small to allocate in the Local Plan. In all, **32** sites failed the HELAA Stage 1, **36** failed the HELAA Stage 2 and three sites were withdrawn.
- 7.10 **Appendix A** sets out the findings of Stage 3 – Detailed Assessment by providing a 'template' for all the sites considered at this stage summarising the findings of the Stage 3 assessment process. In all **89** sites were considered at Stage 3 (i.e. the short-list of sites identified by the HELAA, or re-assessed Local Plan 2016 sites) and following assessment **78** sites were considered appropriate for consideration at Stage 4 – Settlement Assessment.
- 7.11 Sections 10 to 24 of this paper set out the conclusions for Stage 4 – Settlement Assessment at a settlement-by-settlement level. This includes consideration for any cumulative impacts, or reasons, which may affect whether or not a site, or group of sites, should be recommended for allocation.
- 7.12 Sections 10 to 24 also consider the findings for the evidence and appraisals described above at a settlement level, for example the 'exceptional circumstances' for releasing sites from the Green Belt, or how the 'Calverton Test' has been considered. These matters are summarised by the templates set out in **Appendix A**.
- 7.13 The final stage of the site selection process is 'Stage 5 – Detailed Options Testing', which considers if the preferred option emerging from the detailed assessment (Stages 1 to 4) is the most appropriate strategic option for the borough overall. A series of 'reasonable alternatives' were considered, helping to inform the final recommendation, for example seeking to minimise

the level of harm to the Green Belt, or ensure the balance between new housing and new employment is matched as closely as possible. These options were also considered by the Sustainability Appraisal. This stage is described in more detail by Section 26 of this paper.

- 7.14 Following the Stage 5 – Detailed Options Testing, **78** sites are ultimately recommended for inclusion in the plan, this is an increase from 42 sites set out in the original Local Plan as submitted in 2017.
- 7.15 A table summarising the sites recommended for inclusion in the plan is set out in Section 26 of this Topic Paper. This makes it clear if these were included in the original plan, as submitted in May 2017, or if they are additional sites. It also summarises where changes are proposed to sites if they are retained from the submitted plan.

**Table 7.1: Site Selection Methodology – Overview of key stages of the site selection process**

Selection Stage	Description	Number of Sites that meet criteria		Reference
		Input	Output	
1	<b>Preparation of HELAA</b>			
	<b>High Level Assessment</b>  Call for sites – notification of sites to Council from land owners, site promoters and interested parties  HELAA Stage 1: High level assessment to test conformity with Local Plan Strategy or Environmental Constraints, in particular to filter sites out where: <ul style="list-style-type: none"> <li>• The site is wholly located within Flood Zone 3</li> <li>• The site is not contiguous with an urban settlement boundary around an excluded settlement (unless large enough to create a new sustainable village – 1,000 dwellings)</li> <li>• The site is smaller than 0.25 ha or has been promoted for &lt;5 dwellings</li> <li>• The site does not adjoin one of the 7 washed over villages identified in the 2019 Green Belt Study</li> </ul>	144	112 (32 sites failed at Stage 1)	<b>HELAA 2019</b>
2	<b>Preparation of HELAA</b>  <b>Assessment of Suitability/ Availability/ Achievability</b>	112	73 (36 sites failed Stage 2 and 3 sites were withdrawn )	<b>HELAA 2019</b>

	HELAA Stage 2: Identify pool of 'potential' development sites based on high level assessment of 'suitability, availability, achievability and deliverability'. Estimated developable area and initial site capacity estimates are established at this stage, in particular:			
3	<b>Detailed Assessment</b>  More detailed 'filter' of sites against a range of more detailed assessment criteria on a site-by-site basis, in particular: <ul style="list-style-type: none"> <li>• Green Belt Harm and Green Belt Boundaries</li> <li>• <b>Sustainability Appraisal</b></li> <li>• Consideration of flood risk and the sequential test</li> <li>• strategic advantages/ disadvantages</li> <li>• strategic infrastructure requirements and cumulative impacts</li> <li>• identification of indicative site capacities (i.e. either the capacity identified at Stage 1, or a refined capacity in light of any matters identified at Stage 2 such as Green Belt harm)</li> <li>• Calverton Test</li> </ul>	89 (including reassessed Draft Local Plan sites)	52 (35 sites failed Stage 3)*	<b>Site Selection Topic Paper 2019</b>
4	<b>Settlement Assessment</b> Further analysis and detailed evidence testing at a settlement level, in particular: <ul style="list-style-type: none"> <li>• consultation with Key Stakeholders, Infrastructure Providers and Specialist Officers</li> <li>• technical evidence (Transport, Viability,</li> <li>• 'exceptional circumstances' and Calverton Test</li> <li>• Strategic matters (e.g. protection of employment land)</li> </ul>	78 (Includes all Local Plan sites + 2019 sites)	78	<b>Site Selection Topic Paper 2019</b>
5	<b>Detailed Options Testing</b>  Identify 'Reasonable Alternative' 'strategic' Options to inform <b>Sustainability Appraisal</b> and further assessment to ensure boroughs housing requirement is met in full in the most appropriate and sustainable manner.	78	78	<b>Site Selection Topic Paper 2019</b>
6	<b>Identify Preferred Options</b>	78		<b>Site Selection Topic Paper 2019</b>

\*Sites LHe4 and LHe5 have merged to create site LHe4/5 and site WeG3 and WeG3a are only counted once.

## 8. Strands of Evidence and Appraisals

- 8.1 This section provides a high level overview of the evidence and appraisals that help inform the Council's selection of sites for inclusion within the plan, following the more detailed description of the methodology set out in Section 7 of this paper.

### **Housing and Economic Land Availability Assessment (HELAA)**

- 8.2 As already explained the HELAA, that forms Stages 1 and 2 of the Council's Site Selection Methodology, identifies a pool of potential development sites that are then subject to a more detailed assessment through the plan making process. The Council produced a HELAA in 2016 to inform the Draft Local Plan as submitted for examination in 2017. This considered a wide range of sites, including:
- Sites previously put forward, but not allocated, as part of the previous District Plan Public Inquiry held in 2003
  - Broad Locations identified in the Core Strategy Issues and Options 2009 document; or as more defined in the Emerging Core Strategy and Land for Housing Outside Urban Areas consultation in 2012
  - Promoted through the original call for sites in 2007 or as suggested by the Council's consultants at that time, and
  - Subsequently promoted either through a consultation event such as the Local Plan Consultation 2015 or direct to the Council at any time until August 2015
- 8.3 The HELAA 2016 can be found on the Council's website<sup>43</sup>.
- 8.4 To inform the 2019 assessment of sites to inform the ongoing Local Plan Examination, a further iteration of the HELAA has been produced (the 2019 HELAA) as an addendum to the 2016 HELAA. One of the primary aims of the 2019 HELAA is to review the sites promoted to the Council through the Call-for-Sites undertaken early in 2019. It also sets out the Council's most up-to-date windfall assessment (for housing and employment) and includes a summary of the Council's latest evidence around delivery rates for housing development in the borough.
- 8.5 In addition, and to assist with the overall review of potential development capacity in the borough, the 2019 HELAA also considers the capacity and any recently submitted information concerning the sites already proposed for allocation in the Local Plan as submitted in 2017.

---

<sup>43</sup> HELAA 2016: <http://www.welhat.gov.uk/article/5501/Housing>

- 8.6 The 2019 HELAA does not replace the 2016 HELAA, but should be read as an addendum to the 2016 document, principally because not all parts of the HELAA are replicated in the newer version.
- 8.7 It is the role of the HELAA to provide information on the range of sites, and conclude whether sites are, in principle, suitable, available and achievable to meet development needs. It is for the development plan process to determine which of those sites are the most suitable for allocation in the Local Plan. It is also important to note that this is a high-level assessment and therefore consistent with PPG advice (paragraph 005 reference ID 3-005-20140306), the level of assessment is proportionate to the plan-making process.
- 8.8 The HELAA follows a sieving process. If sites are considered to be unsuitable at the Stage 1 sieve, i.e. if they do not meet the criteria set out in the methodology, these sites are not considered by the Stage 2 assessment. For example, it is important that development is directed to the most sustainable locations within the borough. Therefore, sites that are not located within or adjoining an existing urban boundary of a settlement that is inset (excluded) from the Green Belt, are not considered further.
- 8.9 However, in order to extend the range of sites options being considered by the 2019 process, a number of other settlements, not currently inset to the Green Belt have also been included. These settlements were identified by the Green Belt Study Stage 3<sup>44</sup> Report as being suitable to be inset from the Green Belt and are:
- Bell Bar
  - Essendon
  - Lemsford
  - Newgate Street
  - Northaw
  - Stanborough, and
  - Swanley Bar.
- 8.10 Stage 2 of the HELAA assessment considers whether sites are suitable, available and achievable. In total, there are 73 sites that have been assessed as suitable, available and achievable for (housing, employment and education related) development in the HELAA 2019.

### **The Green Belt Review (Stage 1)**

- 8.11 The Stage 1 Green Belt Review (November 2013) is a Strategic Review of the Green Belt, which was jointly commissioned by Welwyn Hatfield, St Albans

---

<sup>44</sup> GB4 - Green Belt Study Stage 3 Report March 2019  
<https://www.welhat.gov.uk/local-plan/new/examination/library>

and Dacorum Borough and District Councils. It provides an assessment of how land in the Green Belt contributes to national and local purposes as set out in national policy<sup>45</sup>. It classifies settlements into three tiers: Primary settlements/towns are defined as 1<sup>st</sup> tier, secondary settlements/large villages are categorised as 2<sup>nd</sup> tier, and other settlements/small villages within the Green Belt are categorised as 3<sup>rd</sup> tier.

- 8.12 For Welwyn Hatfield, 1<sup>st</sup> tier settlements are Welwyn Garden City and Hatfield, 2<sup>nd</sup> tier settlements are the eight excluded (i.e. inset to the Green Belt) villages (Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands and Mardley Heath, Welham Green, Welwyn and Woolmer Green). 3<sup>rd</sup> tier settlements include the smaller washed-over Green belt villages of Essendon, Lemsford, Newgate Street and Northaw as well as the smaller hamlets and areas of ribbon development, which are all located within the Green Belt.
- 8.13 The Review considered four of the national purposes of including land within the Green Belt as set out in the National Planning Policy Framework (NPPF)<sup>46</sup>:
- To check the unrestricted sprawl of large built-up areas
  - To prevent neighbouring towns from merging into one another
  - To assist in safeguarding the countryside from encroachment, and
  - To preserve the setting and special character of historic towns.
- 8.14 The fifth purpose (to assist urban regeneration) was screened out as it was already apparent at the time the Green Belt Review was carried out that there was a limited supply of available or unallocated brownfield land in the three local authority areas and that hitherto, the Green Belt had served a successful purpose in assisting urban regeneration. All parcels of land within the Green Belt Review were therefore considered to perform equally well against this purpose and any attempt to differentiate between sites was considered to be unnecessary.
- 8.15 For the purposes of the Green Belt Stage 1 Review (November 2013), the Green Belt was subdivided into 66 strategic parcels of land. All parcels were then assessed against each of the four national Green Belt purposes. The assessment classified the contribution that each parcel makes as either: a significant contribution, a partial contribution, or limited or no contribution.
- 8.16 The assessments also considered at a strategic level the existing level of built development in the Green Belt, visual openness and countryside character.

---

<sup>45</sup> GB1 – Green Belt Review Purposes Assessment Report  
<https://www.welhat.gov.uk/local-plan/new/examination/library>

<sup>46</sup> CLG 2012 National Planning Policy Framework  
<https://webarchive.nationalarchives.gov.uk/20180608095821/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 8.17 The Stage 1 Green Belt Review 2013 can be found on the website<sup>47</sup>. Parcels GB34, 35, 36, 41, 42, 43A, 43B, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59 and 60 are the parcels assessed in Annex 1.3 for Welwyn Hatfield.

## **Green Belt Review Stage 2**

- 8.18 The Stage 2 Green Belt Review (October 2014) brought together key findings of the Stage 1 Green Belt Review with site level assessments of sites identified in the Councils Strategic Housing Land Availability Assessment (SHLAA – now replaced by the HELAA)<sup>48</sup> and the Gypsy and Traveller Land Availability Assessment<sup>49</sup>. It considered the contribution that each site makes towards the four national Green Belt purposes and one local Green Belt purpose. A similar classification was used to the Stage1 assessment, so that levels of contribution a site makes to the purposes of the Green Belt have been classified as either ‘significant’, ‘partial’ or ‘limited or no’.
- 8.19 An initial assessment was also made of site boundaries. However, a comparison with the strength of the existing Green Belt boundary was not considered and the Stage 2 Review acknowledged that a more detailed boundary assessment would need to be undertaken. The Stage 2 Green Belt Review (October 2014) can be found on the Council’s website (Examination Library reference GB/2)<sup>50</sup>. The Stage 2 Review was supplemented by a Green Belt Stage 2 Addendum Report and an Addendum Site Assessments (2016), Examination Library Reference GB/3 and GB/3a.
- 8.20 It should be noted that not all of the potential development sites considered during 2019 (as described by this paper) were subject to assessment in GB2, as GB2 (or the addendum) did not consider any sites at the washed-over villages. However, these sites were considered by the Green Belt Review Stage 3, as described further below.

---

<sup>47</sup> GB1 – Green Belt Review Purposes Assessment Report  
<https://www.welhat.gov.uk/local-plan/new/examination/library>

<sup>48</sup> HOU 7 to 12 Strategic Housing Land Availability Assessment  
<https://www.welhat.gov.uk/local-plan/new/examination/library>

<sup>49</sup> HOU3 Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment  
<https://www.welhat.gov.uk/local-plan/new/examination/library>

<sup>50</sup> GB2 Green Belt Review Stage 2  
<https://www.welhat.gov.uk/local-plan/new/examination/library>



### Green Belt Review Stage 3

- 8.21 The Stage 3 Green Belt Review (March 2019) built on the Stage 1 and Stage 2 Green Belt Reviews. It considered whether or not any of the washed-over villages should be released from the Green Belt, the potential harm to the Green Belt from new settlement locations and undertook a detailed assessment of all parcels of land adjoining the borough's settlements.
- 8.22 For the purposes of the Stage 3 review, land around the towns, inset villages and washed-over villages with the potential for inseting was divided into 95 parcels. Following the approach of the previous reviews, each parcel was assessed to the extent it performed a Green Belt function, categorised against each of the five NPPF purposes. The Stage 3 review also assessed the degree of harm that would result if a parcel, or a site(s) within that parcel, or a combination of parcels were to be released. Six categories of harm were identified: 'very high', 'high', 'moderate-high', 'moderate', 'moderate-low', and 'low'.
- 8.23 The Stage 3 Green Belt Review (March 2019) can be found on the Council's website.<sup>51</sup>

### Green Belt Boundaries

- 8.24 As part of the Site Selection process, an appraisal was made of Green Belt boundaries comparing, on a site-by-site basis, the relative strength of existing and proposed boundaries. The approach to assessing the strength of each boundary is summarised by **Table 8.1**.

---

<sup>51</sup> GB4 - Green Belt Study Stage 3 Report March 2019  
<https://www.welhat.gov.uk/local-plan/new/examination/library>

**Table 8.1: Strength of Green Belt boundaries**

<b>Strong</b> (prominent physical features)	<b>Moderate</b> (less physical features)	<b>Weak</b> (no definable or weak boundary on the ground)
<ul style="list-style-type: none"> <li>• Roads (Motorways/A &amp; B roads)</li> <li>• Railways</li> <li>• Buildings/urban edge</li> <li>• Extensive/Ancient Woodland</li> <li>• Rivers (Lea and Mimram)</li> </ul>	<ul style="list-style-type: none"> <li>• Minor roads (C roads and unclassified)</li> <li>• ROW: Public footpaths, bridleways, cycle ways</li> <li>• Property boundaries</li> <li>• Small woodland</li> <li>• Streams/brooks (all other watercourses except the Lea and Mimram)</li> <li>• Established tree belt/hedgerow (continuous or with minor gaps)</li> <li>• Distinctive topography, e.g. ridgeline</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental designation</li> <li>• Pylons/towers supporting overhead lines</li> <li>• Fragmented hedgerow</li> <li>• Ditches</li> <li>• Individual or small clusters of trees</li> <li>• Fragmented tree belt/hedgerow</li> <li>• Farm track (not a ROW)</li> <li>• No definable boundary</li> </ul>

## **The Sustainability Appraisal (SA)**

- 8.25 It is a legal requirement for local plans to be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) throughout their preparation. The Council has commissioned specialist consultants to undertake SA incorporating SEA of its emerging Local Plan and an SA Report has informed each stage of the plan making process. The SA Report<sup>52</sup> sets out where there are 'likely' 'significant' sustainability effects of the plan proposals, such as site allocations or policies.
- 8.26 Consultants have also been commissioned to complete a Habitats Regulations Assessment (HRA) that is also reported on separately and meets appropriate legal requirements of the plan making process<sup>53</sup>.
- 8.27 The SA methodology appraises sites and policy intentions against 6 long-term SA objectives (health improvement, safe communities, good citizenship, improving the environment, decent housing, and a thriving economy) and a set of 22 associated sub-objectives. Scores are attributed in the SA to each of the sub-objectives indicating the likely sustainability effects as shown by **Table 8.2**.

**Table 8.2: Sustainability Appraisal scoring**

<sup>52</sup> <https://www.welhat.gov.uk/evidencebase>

<sup>53</sup> <https://www.welhat.gov.uk/evidencebase>

Score	Description
++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
+/-	Mixed effect likely
?	Likely effect uncertain
N/A	Policy is not relevant to SA objective

- 8.28 Sites assessed or reviewed in the HELAA 2019, which have passed the Stage 2 HELAA process and have an estimated capacity of 5 or more dwellings, in the excluded villages or 10 or more dwellings in the towns, have been subject to SA. For sites that had been subject to SA in 2016, the SA scoring was re-assessed through the application of the updated evidence where this was appropriate to the site for example, including: Stage 3 Green Belt Review (March 2019), Landscape Sensitivity Assessment (July 2019)<sup>54</sup> and SFRA Level 2 Addendum (August 2019) together with any other material changes i.e. net increase in capacity. Any changes to the SA scoring as a consequence of this re-assessment process have been noted in a SA Addendum Report.

### **Landscape Sensitivity Assessment July 2019**

- 8.29 This work was undertaken to provide a robust and transparent assessment of landscape sensitivity of land within the Welwyn Hatfield Borough by landscape character areas to inform decision making as part of the Council's site selection process. The work was undertaken, in part, to complement the Green Belt Studies already completed as, even-though the Green Belt designation had been successful in protecting many of the borough's more sensitive landscapes from built development, protecting sensitive landscapes is not one of the purposes of the Green Belt as set out in national policy.
- 8.30 The study concentrated on understanding the sensitivities of land to residential development across the borough. Settlements large enough to be inset, or areas that have absolute constraints that preclude development, such as Ancient Woodland or Historic Parks and Gardens have been excluded from this assessment.

<sup>54</sup> EX156 Welwyn Hatfield Landscape Sensitivity Assessment July 2019  
<https://www.welhat.gov.uk/local-plan/new/examination/documents>

8.31 The study was therefore used to inform the site selection process and is available on the Council's website<sup>55</sup>.

- **Green Gap Assessment 2019**

The Green Gap Assessment provides an additional evidence base to assist the Council's Site Selection process. The Assessment considers the role gaps play between settlements, for example by providing a sense of separation and in maintaining settlement pattern and character.

The Green Gap Assessment will inform a proposed modification to a strategic policy and site specific policy considerations within the relevant settlement chapters of the Plan. The evidence base will inform planning decision making to help minimise impact and, where appropriate, to inform the need for mitigation measures. Sites that may be affected have been highlighted by the Site Selection process to ensure that any impacts are considered, and where necessary, that appropriate mitigation is incorporated within the amended site allocation policies.

## **Transport Assessment**

The Council has worked closely with the County Council, who as Highways Authority have responsibility for highway related matters in Hertfordshire who also work in partnership with Highways England, in relation to the Strategic Highway network, i.e. the A1 (M). Consultants were commissioned to prepare updated transport evidence testing the impact of additional development and ensuring that any proposals were both compliant with national policy, and where necessary, that appropriate infrastructure improvements had been identified<sup>56</sup>. Any impacts or identified necessary infrastructure are discussed further with the Settlement sections of this topic paper (sections 10 to 24).

Due to the time necessary to complete this work, development scenarios were initially tested to ensure that an estimated quantum of development was acceptable across the borough. This is set out within the Updated Transport Technical Note. This work will now be updated to test the final proposals as set out in this paper. However, as the development scenario was higher than

---

<sup>55</sup> EX156 Welwyn Hatfield Landscape Sensitivity Assessment July 2019

<https://www.welhat.gov.uk/local-plan/new/examination/documents>

<sup>56</sup> <https://www.welhat.gov.uk/evidencebase>

the actual and final proposals, it is unlikely that any additional impacts will be identified by the final assessment.

### **Flood Risk**

- 8.32 As part of the preparation of the Draft Local Plan, the Council commissioned a Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2. Published in December 2015 (and amended in May 2016), this updated and replaced the 2009 SFRA. The 2015 study assessed flood risk from all types of flooding in the borough, taking into account climate change, in line with current national policy and guidance. The Level 2 SFRA assessed flood risk associated with a number of specified sites in more detail.
- 8.33 The SFRA can be found on the Council's website<sup>57</sup>.
- 8.34 A 2019 Level 2 SFRA has also been prepared, partly to ensure the previous assessment remains valid, for example considering any updated modelling or available data, and assessing any new sites, not previously considered<sup>58</sup>.
- 8.35 Where part of a site falls within Flood Zones 2, 3a or 3b, and a sequential approach to layout that restricts development to Flood Zone 1 within a site is feasible, the site passes the Sequential Test and an Exception Test does not need to be applied.
- 8.36 All sites considered at Stage 3 (Detailed Assessment) stage have passed the Sequential Test that was considered in more detail within the HELAA.

### **Strategic Advantages or Disadvantages**

- 8.37 Consideration is given to whether there are any strategic advantages or disadvantages associated with bringing forward individual sites, such as assisting the delivery of a school, that should be taken into account as part of the decision making process e.g. the on-site or associated off-site provision (or loss) of community or other infrastructure that would not otherwise be provided on other sites. Any potential strategic advantages or disadvantages have been informed in part by information provided by those bodies promoting the site, or by infrastructure providers and key stakeholders, including Hertfordshire County Council.

---

<sup>57</sup> <https://www.welhat.gov.uk/evidencebase>

<sup>58</sup> <https://www.welhat.gov.uk/evidencebase>

## **Strategic infrastructure and cumulative impacts**

- 8.38 Where strategic infrastructure constraints are known to exist, these are set out on a settlement-by-settlement basis as is the potential for constraints or impacts that may affect the consideration of a group of sites.

## **Indicative site capacities**

- 8.39 Indicative site capacities are based on evidence that is proportionate to a strategic level assessment carried out as part of the plan making process. These are identified and included within the 2019 HELAA update<sup>59</sup>.
- 8.40 A relatively cautious approach has generally been applied in light of known constraints and whilst the approach taken is considered to be robust the 'indicative site capacities' identified are not intended to be definitive. Should individual sites progress to planning application stage, it should be noted that the actual capacities of sites coming forward might vary slightly (either upwards or downwards).

## **The Calverton Test**

- 8.41 In addition to policy requirements set out within the Framework, the High Court Judgement of Justice Jay in the case of Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 (Admin), set out a number of matters that should also be identified and dealt with in order to ascertain whether 'exceptional circumstances' exist to justify making amendments to the Green Belt.
- 8.42 The Planning Inspector presiding over the WHBC Local Plan Examination made reference to the Calverton High Court Judgement in his correspondence dated 27 January 2018 making it clear that the Council should give consideration to the matters identified by the Calverton case. Furthermore, the Inspector, in his correspondence date 24 October 2018, also suggested that some Green Belt evidence might need to be considered on a site-by-site basis.
- 8.43 For these reasons, the Council has considered Green Belt evidence, as described above, on a site-by-site basis (Section 7 and **Appendix A**), at a strategic level (Section 6) and at a settlement level (Section 10).

---

<sup>59</sup> <https://www.welhat.gov.uk/evidencebase>

8.44 In relation to the matters outlined in the Calverton Case, these have been considered on a site-by-site basis (matters 4 and 5 set out below) and at a strategic and settlement level (matters 1 to 3 set out below). The matters for consideration identified by the Calverton Case, are:

1. The acuteness/ intensity of the objectively assessed need (matters of degree may be important)
2. The inherent constraints on supply/ availability of land *prima facie* for sustainable development
3. The consequent difficulties in achieving sustainable development without imposing on the Green Belt
4. The nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed), and
5. The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

## 9. Weighting

- 9.1 As explained in Section 7 of this paper, the Detailed Site Assessment Stage (Stage 3), of the site selection methodology was informed by a range of evidence or appraisals, such as the Sustainability Appraisal or Green Belt Study. These are explained briefly in Section 7 and a summary of the findings, on a site-by-site basis are shown by **Appendix A** and at a settlement level with Sections 10 to 24 of this paper.
- 9.2 Another part of the site selection methodology, also discussed in Section 7, is that weighting is applied to each piece of evidence or appraisal information at a site-by-site level, to assist the assessment. A summary of the weighting scores is set out within **Appendix A** for each site, along with any policy implications should the site be allocated.
- 9.3 The following section provides a brief overview of how the evidence and appraisals have been weighted. It should be made clear however, that these weightings are taken as a guide to inform decision making, and may also be considered in light of particular circumstances that affect an individual site. The weightings should therefore be viewed as a set of guidelines to assist decision-making and so are not definitive in how they are applied.

### **Housing and Economic Land Availability Assessment (HELAA)**

- 9.4 The HELAA provides a conclusion for each site, whether a site is considered suitable, available and achievable and if so, at what point in the plan period the site is likely to come forward. So, if for example there are delays anticipated around site availability or infrastructure constraints that require a lead-in time in advance of development taking place, this is taken into account in the HELAA.
- 9.5 The delivery estimate is therefore a key conclusion as it takes into account any known constraints. All sites where there is a reasonable prospect of delivery within the plan period have a positive weight afforded to them. Sites that have greater certainty, and are expected to be delivered in the early to mid-parts of the plan period are given a more favourable weighting than sites that carry a degree of uncertainty (due to the need to overcome noted constraints) and are not expected to come forward until the later part of the plan period or beyond the plan period.



**Table 9.1: HELAA weighting**

<b>Delivery timeframe</b> (from adoption of plan)	<b>Weighting</b>
1-5 years	Significant in favour
1-5/6-10 years	Moderate in favour
6-10 years	Moderate in favour
11-15 years	Minor in Favour
16 + years	Minor against

**Green Belt Study (Stages 1, 2 and 3)**

- 9.6 Weight is afforded to the contribution a site makes to the Green Belt purposes in recognition of the importance afforded to Green Belt land by the NPPF. Similarly, weight is also afforded based on the level of harm that would result from the release of a site from the Green Belt. Whilst all stages of the Green Belt Study are considered, to ensure consistency, weighting is applied with reference to the assessment carried out in the Stage 3 Green Belt Review.

**Table 9.2: Contribution to Green Belt purposes weighting**

<b>Contribution to Green Belt purposes</b>	<b>Weighting</b>
2 significant national purposes	Significant against
1 significant national purpose	Moderate against
2 partial national purposes	Minor against
1 partial national purpose	Minor in favour
Limited or no national purpose	Moderate in favour
Urban sites	Significant in favour

**Table 9.3: Assessment of potential harm weighting**

Assessment of potential harm to Green Belt	Weighting
Very high harm	Substantial against
High harm	Significant against
Moderate-high harm	Moderate against
Moderate harm and moderate-low harm	Minor against
Low harm	Neutral
Urban sites	Significant in favour

### **Green Belt Boundaries**

- 9.7 Consistent with the NPPF, account has been taken of the need to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. A comparison has also been made with the strength of the existing Green Belt boundary.
- 9.8 The Stage 3 Green Belt Review identified seven settlements washed over by the Green Belt that had the potential to be inset. There are currently no defined Green Belt boundaries around these settlements. Therefore, where a site adjoined one of these seven settlements, listed below, the extent of the potential inset area (as identified in the Stage 3 Green Belt Review) was taken, for the purposes of undertaking a Green Belt boundary comparison, to represent the existing Green Belt boundary. The seven washed over Green Belt settlements are: Lemsford, Newgate Street, Stanborough, Essendon, Northaw, Bell Bar and Swanley Bar. The weighting applied is shown by Table 9.4.

**Table 9.4: Green Belt boundary weighting**

<b>Strength of boundaries</b>	<b>Weighting</b>
New boundary would be stronger overall or in part than existing boundary and is clearly defined	Significant in favour
New boundary would be similar in strength to the existing boundary and is clearly defined	Moderate in favour
New boundary would be partially weaker than the existing boundary but is clearly defined	Minor in favour
New boundary would be partially weaker than the existing boundary and is not clearly defined	Minor against
New boundary would be predominantly weaker than the existing boundary but would be clearly defined	Moderate against
New boundary would be predominantly weaker than the existing boundary and would not be clearly defined	Significant against

## **Sustainability Appraisal**

- 9.9 The Sustainability Appraisal (SA) appraises the sites against a set of 22 sub-objectives, such as avoiding or reducing air pollution, protecting and enhancing open space and landscape character, retaining local distinctiveness, etc. The SA then indicates the likely sustainability effects of developing an individual site against each of the SA sub-objectives and where there is 'likely' to be a significant effect, whether any mitigation may be required to overcome the effect.
- 9.10 Weight was given to the relative balance between the likely significant positive or significant negative effects associated with the SA assessment of each site. Whilst the SA also considers minor effects, it is the likely 'significant' effects that are weighted to inform decision-making as part of the site selection process.

**Table 9.5: Sustainability Appraisal weighting significant positive and negative effects**

Sustainability Appraisal	Weighting
More than 3 times double positives (++) than double negatives (--) (e.g. 7:1 or 8:2)	Significant in favour
2 to 3 times more double positives (++) than double negatives (--) (e.g. 6:2 or 7:3)	Moderate in favour
Less than twice as many double positives (++) than double negatives (--), e.g. 5:3 or 6:4	Minor in favour

## Landscape Sensitivity

- 9.11 The Landscape Sensitivity Study assesses the sensitivity of landscapes against five categories ranging from low to high, where low sensitivity refers to a landscape that: ‘lacks distinct character and qualities and has few notable features, or is robust with regard to introducing built development’, and where high sensitivity refers to a landscape that: ‘has strong character and qualities with notable features which are highly sensitive to change as a result of introducing built development’.
- 9.12 The weighting applied therefore reflects the sensitivity categories as shown by Table 9.6. The assessment findings are shown by the site templates set out in **Appendix A**.

**Table 9.6: Landscape Sensitivity weighting**

Landscape Sensitivity	Weighting
Low	Significant in favour
Low – Moderate	Moderate in favour
Moderate	Neutral
Moderate – High	Moderate against
High	Significant against

## **Flood Risk**

- 9.13 All of the sites considered within the Detailed Assessment Stage (Stage 3) pass the Sequential Test and no development areas are considered within Flood Zones 2 or 3. On this basis, no weighting is given to the short-listed sites on the basis of flood risk.

## **Strategic Advantages or Disadvantages**

- 9.14 The final factor considered in the site selection process and weighted to assist decision-making relates to what has been labelled as 'strategic advantages or disadvantages'. This refers to whether a site is likely to result in any strategic advantages that would otherwise be unlikely to be delivered, such as for smaller sites.
- 9.15 For example, a site may present the opportunity to deliver important community infrastructure such as a secondary or primary school, strategic Green Infrastructure that forms part of a strategic planned network of sites, or a large or small neighbourhood centre, which can only be delivered in association with a significant level of growth. Without such sites, essential community infrastructure is unlikely to be delivered alongside growth in the borough and this is considered important to be taken into account. Alternatively, a site may provide an opportunity to deliver employment floor space to contribute towards the borough's economic growth strategy or make a direct contribution towards regeneration priorities.
- 9.16 A site may also provide an opportunity to provide enhanced facilities for an adjoining community use. However, whilst these may be viewed as a wider community benefit (beyond what is absolutely necessary for a development to be considered suitable in principle), they are unlikely to be essential to the overall delivery of growth in the borough and are afforded less weight than the need to deliver strategic infrastructure alongside growth in the interests of sustainable development.
- 9.17 Conversely, this part of the Site Selection process notes if the development of certain sites may result in any strategic disadvantages, such as the loss of existing community or other infrastructure, with or without an opportunity for replacement during the plan period.
- 9.18 The greater the strategic advantage or disadvantage, the greater the weight is afforded as summarised by **Table 9.7**.

**Table 9.7: Strategic advantages and disadvantages weighting**

Strategic Advantages or Disadvantages	Weighting
Large scale infrastructure provision, such as a secondary school, a large neighbourhood centre or large parcel of strategic Green Infrastructure (GI), opportunity to make significant provision for employment land.	Significant in favour
Primary school provision, small neighbourhood centre, moderate contribution to strategic GI, moderate contribution to employment land supply.	Moderate in favour
Other new community infrastructure which would serve new and existing communities / enhancement to existing community facilities	Minor in favour
Loss of a small community facility but with a reasonable prospect of replacement within the plan period	Minor against
Loss of a small community facility but with no reasonable prospect of replacement within the plan period.	Moderate against
Loss or significant reduction in a strategic community facility or other infrastructure with no reasonable prospect of replacement within the plan period. Significantly inconsistent with settlement strategy.	Significant against

## 10. Welwyn Garden City

### Draft Local Plan 2016: Sites Proposed for Allocation

- 10.1 There were thirteen sites proposed for allocation in the Draft Local Plan 2016 for Welwyn Garden City. These are listed in **Table 10.1**, which also identifies whether the sites are located within an urban or Green Belt location. In addition, one site at Welwyn Garden City lies within an Area of Special Restraint (ASR\*).

**Table 10.1: Sites proposed for allocation in the Draft Local Plan 2016 at Welwyn Garden City**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
SDS1	WGC4/7	Panshanger	ASR*	650**
SDS2	WGC5	Land south east of WGC	Green Belt	1,200
SDS3	Pea02b	Broadwater Road SPD Site (north)	Urban	850
SDS4	Pea02c	Broadwater Road SPD Site (west)	Urban	171
HS1	Pan01b	Land at Bericot Way	Urban	28
HS2	WGC1	Creswick	Green Belt	290
HS3	Pea08	80 Bridge Road East	Urban	32
HS4	Hal03	Ratcliff Tail Lift Site	Urban	110
HS5	Hol19	Hyde Valley House, Hyde Valley	Urban	17
MUS1	Han40	WGC Town Centre North site	Urban	98
HS6	Han91	Land at Gosling Sports Park	Urban	250
HS7	Hal02	Land at Waterside	Urban	20
HS8	Pea24	St Michael's House, Holwell Road	Urban	22
<b>Total</b>				<b>3,738</b>

\* SDS1 has been designated as an area of Area of Special Restraint (ASR) since 1993 and safeguarded for development needs beyond 2011, subject to a review of the plan.

\*\* Note the Errata to Policy SADM21 in the Draft Local Plan 2016, amended the figure of 725 dwellings to 650 dwellings.

## Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 10.2 The 2019 site selection process considered **20 additional** sites, along with the original Draft Local Plan 2016 sites listed in **Table 10.1**. Eight of the additional sites failed the HELAA stages (Stages 1 and 2), one site was withdrawn and eleven additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 10.2** that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 10.2: Results of Stages 1 and 2 (HELAA 2019) of the Sites Selection process at Welwyn Garden City.**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
Han40a	Campus East Car Park	Urban	N/A	250
Hol20	North of the Beehive PH, Beehive Lane	Urban	N/A	5
Hol22	Land at Chequersfield	Urban	Land Contamination issue	0
Hol23	Hollybush Lane	Urban	N/A	16
How92	Woodside Centre	Urban	Not available during the plan period	0
Pea97	Former Norton Building	Urban	N/A	122
Pea102	Bio-Park, Broadwater Road	Urban	N/A	179
Pea103	29 Broadwater Road	Urban	N/A	128
Pea104	YMCA, 90 Peartree Lane	Urban	N/A	15 Net
Pea105	61 Bridge Road	Urban	N/A	21
Pea106	73-83 Bridge Road East	Urban	N/A	235 dwellings/ 1,653sqm of B1a
Pea107	B&Q, Swallowfields	Urban	N/A	97
Sh92	Haymeads	Urban	Withdrawn	0
WGC2	Land and pumping station, Digswell Park Road	Green Belt	Access issues	0
WGC4a	Land North East of Welwyn Garden City	Green Belt	N/A	75*
WGC6	Land east of Digswell Hill	Green Belt	Ecological impacts	0
WGC6a	Yard south of Crossway	Green Belt	Does not adjoin an excluded Green belt settlement	0
WGC9	Warrengate Farm	Green Belt	Heritage impacts	0
WGC10	62 Crossway	Green Belt	Ecological impacts	0
WGC11	Land fronting Hertford Road	Green Belt	Heritage impacts	0
<b>Total</b>				<b>1,143 and 1,653sqm of B1a</b>

\*Note: WGC4a is proposed as an extension to the Draft Local Plan 2016 site SDS1 (WGC4/7), which was proposed for 650 dwellings, thus the two sites combined would provide 725 dwellings in total



- 10.3 As highlighted in Table 10.2, there was one site promoted for mixed-use development, including 1,653sqm of B1a (office) employment use. However, a number of the sites promoted for housing are currently in employment use (**Table 10.3**) and so consideration is needed, not simply for the suitability of the sites to assist in meeting the borough's housing requirement, but also if it is appropriate to lose their existing, and future potential, for providing employment. The merits and demerits of allocating existing employment land for housing are discussed more in the following sections.

**Table 10.3: Results of Stages 1 and 2 (HELAA 2019) of the Sites Selection process that were promoted for housing but are located within an Employment Area at Welwyn Garden City**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Site Area / B class use floorspace)
Pea97	Former Norton Building	Urban	Minimal B1a floorspace remaining. Prior approval in place for residential development for part of building	1.35ha / 150sqm
Pea102	Bio-Park, Broadwater Road	Urban	Forms part of the policy SP17 mixed use development site. B1b current primary use.	1.3ha / 11,071sqm
Pea103	29 Broadwater Road	Urban	Prior approval in place for residential development.	0.7ha / 3,925sqm
Pea105	61 Bridge Road	Urban	B class use (mix) uses	0.23ha / 1,140sqm
Pea106	73-83 Bridge Road East	Urban	Current B2 and former car sales use. Promotion involves loss of B2 and provision of 1,653sqm of B1 floorspace, net loss of B class floorspace = 2,907sqm metres	1.34ha / 4,560sqm plus sui generis uses
Pea107	B&Q, Swallowfields	Urban	Retail floorspace with associated storage, delivery and parking	1.08ha / N/A
<b>Total</b>				<b>6.0 ha</b>

## Site Selection 2019: Stage 3 – Detailed Assessment

- 10.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 10.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 10.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 10.6 Welwyn Garden City is the most sustainable location for development within the borough, it is identified as the top tier settlement in **Policy SP3: Settlement Hierarchy** as the borough’s ‘main town’ providing good accessibility to public transport, a major town centre, services and facilities and employment opportunities.
- 10.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study are not considered for allocation in the emerging Local Plan.
- 10.8 However, almost all of the additional sites considered at Welwyn Garden City are urban sites, that would result in no change or harm to the Green Belt.
- 10.9 Given the sustainability credentials of the settlement, and the importance of protecting the Green Belt, any proposed urban sites are therefore recommended for allocation, unless the site specific assessment identifies evidence that this would not be appropriate (see **Table 10.4** – below).

### ***Employment land***

- 10.10 Of particular consideration at Welwyn Garden City is the suitability of releasing employment sites that were promoted for housing (**Table 10.3**). A balance is needed between the potential sustainability of sites, given their location within the most sustainable location in the borough, versus the need to plan for an appropriate and sustainable level of employment and to ensure job growth appropriately matches housing growth.

- 10.11 The requirement for employment land overall, i.e. at a borough level, is discussed more in **Section 6**. This concludes that the proposed changes to the plan, set out in this paper, would lead to a shortfall of 1.63 hectares of employment land within the borough in the plan period. However, it is considered that on balance, this is acceptable, given the conclusions of the Planning Inspector that the original proposals set out in the Draft Local Plan 2016, as submitted, was for a level of employment that would be likely to lead to in-commuting, and that this would be unlikely to be a 'sound' approach.
- 10.12 In order for the Council to identify sufficient sites to meet the housing requirement, it is necessary to release some existing employment sites within existing urban areas for housing as the alternative would involve relying on releasing additional sites that would lead to 'high' harm to the Green Belt. This consideration of strategic options is discussed in more detail in **Section 26**.
- 10.13 The suitability of employment sites has nonetheless also been considered on a site-by-sites basis (refer to detailed site templates **Appendix A**).
- 10.14 There are six sites that are located within the Welwyn Garden City Employment Area (EA1 in Policy SADM10 of the Draft Local Plan 2016) under consideration for allocation as housing sites.
- 10.15 Two of these sites (Pea97 and Pea103) already benefit from Prior Approval for residential development (as a result of permitted development rights). However, both sites have been promoted for higher levels of development than could be achieved through the implementation of the existing approvals. The allocation of both these sites would enable the policy to inform the design, mix and type of residential development brought forward and for higher capacities to be achieved.
- 10.16 One site (Pea106) is proposed for a residential-led mixed-use development, including 1,653sqm B1a (office) uses (with an associated loss of B2 class use and sui-generis floorspace). The mixed-use nature of this proposal would help to reduce the scale of employment floorspace being lost and to improve the mixed-use status of the Bridge Road area, where there has already been a loss of employment sites.

- 10.17 The site (Pea105) is a relatively small site, it is located in an accessible location to the town centre, employment areas and sustainable modes of transport. The allocation of the site will help to deliver housing within early parts of the plan period as well as contribute towards the Councils five-year land supply. The site adjoins a site that has recently been developed for residential use and the loss of employment associated with releasing this site is relatively modest and so on balance, its allocation for housing is considered to be appropriate.
- 10.18 One of the sites under consideration (Pea107) has an existing retail use. It is well located within proximity of Welwyn Garden City Town Centre where there is opportunity for linked trips into the Town Centre helping to protect and enhance its vitality and viability. The Retail and Town Centre Needs Assessment Update (2016) identifies a need for new retail floorspace and the loss of this site would result in a shortfall that would need to be re-provided elsewhere. On this basis, it is considered that release of this site for housing would **not** be appropriate.
- 10.19 The final site under consideration in the context of existing employment sites with Welwyn Garden City is site Pea102 (Bio-Park). This site accommodates specialist laboratory/office space with underground parking and is currently part vacant. The University of Hertfordshire has confirmed its intention to close the facility and the site has been marketed for sale. Full vacancy is expected within the next few months. The building is understood to need modernisation at considerable cost to attract life science occupants. Marketing evidence submitted indicates limited interest in the site for specialist B class users. On balance, it is considered that the specialist nature of the buildings and the investment required could make the site difficult to sell or let and the contribution the site could make to housing land supply outweighs the loss of employment land.

### ***Green Belt***

- 10.20 There are two sites identified in the Draft Local Plan 2016 that are located within the Green Belt (SDS2/WGC5 and HS2/WGC1). These lead to lower than 'high' harm to the Green Belt. Given the location of these sites at the borough's most sustainable settlement, the significant contribution these sites make to the borough's housing requirement and the relative lack of impact on the Green Belt, these sites continue to be supported.
- 10.21 Only one additional site (WGC4a) is considered in the context of the Green Belt, which if allocated, would constitute an extension to site SDS1 (WGC4/7), which is already proposed for allocation in the Draft Local Plan 2016 for 650 dwellings.

- 10.22 An outline planning application has already been submitted for site SDS1 (WGC4/7) and WGC4a has been promoted as a second phase of development to follow the build out of the adjoining site SDS1 (WGC4/7). However, part of WGC4a falls within an area identified as more sensitive to development and a limited capacity of 75 dwellings has been concluded as suitable on an adjusted developable area.
- 10.23 The capacity of four Draft Local Plan 2016 sites is changed to either correct a minor error in the Draft Plan (MUS1), or to reflect the granting of (yet to be implemented) planning permissions (sites SDS3 and HS1) or to reflect a proposed plan modifications (site HS2). These are referenced in Table 10.5 for information. Furthermore, the capacity for site (WGC5) is increased from 1,200 to 1,300, as work commissioned by the Council to inform a future Supplementary Planning Document for this site indicates that it would be possible to achieve a slightly higher density around the new neighbourhood centre located on the southern part of the site. As a result, the Council acknowledges that it may be possible to deliver an additional 100 dwellings and deliver a sustainable and high quality development.
- 10.24 On this basis, and following the detailed Stage 3 assessment, there are ten additional sites considered appropriate for allocation in addition to the thirteen sites identified in the Draft Local Plan 2016. These are shown by **Table 10.4**, which also lists those sites not considered suitable for allocation following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.

**Table 10.4: Result of the Stage 3 Detailed Assessment at Welwyn Garden City**

<b>Draft Local Plan 2016 (Site Ref)</b>	<b>HELAA 2019 (Site Ref)</b>	<b>Site Name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
N/A	Han40a	Campus East Car Park	Urban	Considered for allocation	250
N/A	Hol20	North of the Beehive PH, Beehive Lane	Urban	Too small for allocation	5
N/A	Hol23	Hollybush Lane	Urban	Considered for allocation	16
N/A	Pea97	Former Norton Building	Urban	Considered for allocation	122
N/A	Pea102	Bio-Park, Broadwater Road	Urban	Considered for allocation	179
N/A	Pea103	29 Broadwater Road	Urban	Considered for allocation	128
N/A	Pea104	YMCA, 90 Peartree Lane	Urban	Considered for allocation	15
N/A	Pea105	61 Bridge Road	Urban	Considered for allocation	21
N/A	Pea106	73-83 Bridge Road East	Urban	Considered for allocation	235 dwellings and 1.653sqm of B1a
N/A	Pea107	B&Q, Swallowfields	Urban	Impacts of the loss of A1 comparisons goods floor space within a sustainable location, exceed any benefits of allocating the site for residential use	0
N/A	WGC4a	Land North East of Welwyn Garden City	Green Belt	Considered for allocation as an extension to SDS1	75
SDS1	WGC4/7	Panshanger	ASR	Local Plan 2016 Site	650
SDS2	WGC5	Land SE of WGC	Green Belt	Local Plan 2016 Site. Capacity increased from 1,200 to 1,300	1,300
SDS3	Pea02b	Broadwater Road SPD Site (north)	Urban	Local Plan 2016 Site. Capacity increased to reflect planning permission 6/2018/0171/MAJ	1,403

<b>Draft Local Plan 2016 (Site Ref)</b>	<b>HELAA 2019 (Site Ref)</b>	<b>Site Name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
SDS4	Pea02c	Broadwater Road SPD Site (west)	Urban	Local Plan 2016 Site	171
HS1	Pan01b	Land at Bericot Way	Urban	Local Plan 2016 Site. Capacity reduced to reflect planning permission 6/2017/2202/OU TLINE	21
HS2	WGC1	Creswick	Green Belt	Local Plan 2016 Site. Capacity increased by 10 to reflect modification proposed following Hearing Session 4	300
HS3	Pea08	80 Bridge Road East (AL7 1JY)	Urban	Local Plan 2016 Site	32
HS4	Hal03	Ratcliff Tail Lift Site	Urban	Local Plan 2016 Site	110
HS5	Hol19	Hyde Valley House, Hyde Valley	Urban	Local Plan 2016 Site	17
MUS1	Han40	WGC Town Centre North SPD site	Urban	Local Plan 2016 Site. Updated for consistency between SADM19 and SADM21	100
HS6	Han91	Land at Gosling Sports Park	Urban	Local Plan 2016 Site	250
HS7	Hal02	Land at Waterside	Urban	Deleted to reflect modification to remove site from the plan following Hearing Session 4	0
HS8	Pea24	St Michael's House, Holwell Road	Urban	Local Plan 2016 Site	22
<b>Total</b>					<b>5,422 and 1,653sqm of B1a</b>

## **Stage 4 - Settlement Level Assessment**

10.25 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

10.26 There are overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Of particular consideration at Welwyn Garden City is the potential loss of employment sites. As discussed, some of the sites put forward currently within an employment use are considered appropriate for housing. The consideration of the strategic options affecting this outcome are discussed more in Section 26.

10.27 Similarly, a consideration of the impact on the Green Belt and demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis (although the majority of sites under consideration at Welwyn Garden City are urban sites that do not lead to any Green Belt impacts).

### **Key Infrastructure Issues**

10.28 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.



### ***Secondary Schools***

- 10.29 Hertfordshire County Council (HCC) as the education authority advises that it would be prudent to plan for an additional yield of approximately 12.2 form entry (FE) to accommodate combined growth associated with Welwyn Garden City, Woolmer Green, Oaklands and Mardley Heath, Welwyn, Lemsford and Stanborough.
- 10.30 One new 8FE secondary school site to serve Welwyn Garden City has been identified within the area known as Birchall Garden Suburb, to the east of Welwyn Garden City but within the administrative area of East Herts. This leaves a shortfall of 4.2 FE. HCC intends that this would be met partly through use of a combined 2.5 FE of available capacity or expansion of the three existing secondary schools in the town.
- 10.31 HCC also notes that 1FE of further capacity at Stanborough School would become available to meet the needs of Welwyn Garden City, once the proposed new 8-10FE secondary school at north-west Hatfield SDS5 (Hat1) becomes available (this latter school would also be well-placed to accommodate the needs arising from development sites at Lemsford and Stanborough). Overall this leaves a notional shortfall of 0.7FE, but taking account of applications for faith provision and single sex schools, HCC are satisfied that there will be sufficient secondary capacity to meet the need arising from new housing in Welwyn Garden City and the northern villages.

### ***Primary schools***

- 10.32 HCC as the education authority advises, based on the sites now proposed for allocation, that it would be prudent to plan for an additional yield of 11.1 FE within Welwyn Garden City and Stanborough. Two new 2FE primary schools are proposed, at SDS1 (WGC4/7) (Panshanger) and SDS2 (WGC5) (Birchall Garden Suburb), while 3FE of primary provision is proposed on that part of Birchall Garden Suburb within East Herts (EWEL1). A relocation and 2FE expansion of Peartree School is also proposed in central Welwyn Garden City. The remaining 2.1 FE is proposed to be met through expansion of existing primary schools, although some flexibility is likely to be required in travel distances to school from new developments within Welwyn Garden City.

## ***Highways***

- 10.33 Transport modelling work has been undertaken using Hertfordshire County Council's COMET model to assess increases in congestion and waiting times at key junctions on the network, which are likely to arise as a result of development of the selected local plan sites.
- 10.34 This modelling work has factored in certain localised highway capacity improvements, which were tested at an earlier stage of modelling, and which are contained in the Infrastructure Delivery Schedule, which is at Appendix 1 to the Infrastructure Delivery Plan (IDP). Even with these improvements, congestion and waiting times at key junctions are likely to increase. HCC as Highway Authority, however, does not consider that these impacts will be severe, or that highway safety would be compromised.

## ***Utilities***

- 10.35 As regards sewage treatment, new development in Welwyn Garden City will drain to Rye Meads sewage works at Hoddesdon. A number of local authorities within the Rye Meads catchment are proposing significant housing growth. Based on current growth forecasts, Thames Water's recent high level assessment indicates that from a final effluent stream point of view the sewage treatment works is expected to have capacity up to 2036.
- 10.36 Additional modelling work was also carried out by Thames Water in 2018 in response to concerns about capacity in the sewerage network to accommodate flows from the Panshanger development site SDS1 (WGC4/7), alongside other development in Welwyn Garden City, including land to the south-east of the town SDS2 (WGC5). The work by Thames Water showed that additional online storage capacity would need to be provided, and that this would be feasible.
- 10.37 Thames Water has advised that there will be a lead-in time of between three and five years, from the granting of planning permission, to provide the additional network capacity to serve some of the larger proposed development sites, including Panshanger SDS1 (WGC4/7) and WGC4a, land to the south-east of Welwyn Garden City SDS2 (WGC5) and the former Shredded Wheat site SDS3 (Pea02b). This will require liaison between the Council, Thames Water and the developer in each case.

## **Strategic Advantages/Disadvantages**

- 10.38 The majority of sites under consideration at Welwyn Garden City are not associated with strategic advantages or disadvantages, although several sites would result in the loss of employment land (as discussed – earlier in this section). Some sites are also associated with urban regeneration.
- 10.39 The larger proposed allocations, as set out in the Draft Local Plan 2016 SDS1 (WGC4/7) and SDS2 (WGC5) would deliver primary schools and a wide mix of dwelling types including Gypsy and Traveller pitches. Site SDS2 (WGC5) would also deliver a local neighbourhood centre and the wider site extends into neighbouring East Hertfordshire District that also makes provision for a new Secondary School for the area, including part of the Welwyn Garden City catchment. Taken together, these sites therefore make a significant contribution to strategic infrastructure.

## **Green Belt Matters**

- 10.40 Consideration is needed for how the Green Belt boundary could be amended to Welwyn Garden City as a whole to ensure accordance with national policy, so that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 10.41 However, as discussed, the sites that are proposed in the Green Belt adjoining this settlement do not lead to ‘high’ levels of harm.
- 10.42 To reduce the impact of development to the lowest reasonable practical extent, the site boundaries have been designed to minimise the level of harm. For example, the site WGC1, falls within a larger ‘high’ harm parcel, but development is restricted to the area that falls within Parcel 27b as identified in the Green Belt Study (Stage 3). This area is considered to form the edge of a plateau rather than the valley side and thus development of this reduced parcel would not weaken the remaining Green Belt.
- 10.43 The other two sites, WGC4a and WGC5 would both lead to ‘moderate – high’ harm to the Green Belt. However, the ability to make a significant contribution to the borough’s housing requirements at its most sustainable settlement, without leading to ‘high’ harm and also contributing to strategic infrastructure, is considered, on balance, to outweigh any impact. Harm is reduced to the lowest reasonable extent by ensuring that the new boundaries are created that are at least as strong as the existing and that are robust and defensible.

## **Proportional distribution of growth**

- 10.44 The proportion of households located at Welwyn Garden City is 44.7% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion dwellings associated with the proposed allocations in the Draft Local Plan 2016 was 46.6%, thus the original local plan, as submitted, was proposing a level of growth slightly above that necessary to achieve a proportional distribution.
- 10.45 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. However, as the level of growth across the borough is increasing, and the level of growth at Welwyn Garden City is going up, predominantly by adding additional urban sites, including releasing additional employment sites and increasing the capacity of some of the original Draft Local Plan 2016 sites, the proportion actually falls slightly to 45.5%. Thus the proportion of growth at Welwyn Garden City more closely matches a proportional level of distribution overall.
- 10.46 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## **Conclusions**

- 10.47 The site selection process has tested 20 additional sites, in addition to re-appraising those sites proposed in the Draft Local Plan 2016. This work has resulted in ten additional sites being proposed for allocation at Welwyn Garden City in addition to the thirteen already proposed in the Local Plan 2016. The number of dwellings to be delivered at a number of Draft Local Plan 2016 sites has changed to reflect either recently granted planning permissions, proposed plan Modifications or more recent work carried out/ commissioned by the Council. .
- 10.48 Consideration has been given to minimising harm to the Green Belt, to ensure the proposed change to Green Belt boundaries are robust and defensible and that the level of development is sustainable.
- 10.49 Overall, a significant contribution to the borough's housing requirement is proposed at the area's main town and most sustainable location for development. However, this equates to almost exactly the level of growth needed to support a proportional level of distribution at around 45.5% of the total growth proposed across the borough.

10.50 Many of the development sites proposed are urban, some contribute towards urban regeneration and others involve the loss of employment provision. Overall, the proposals are considered to balance the need to deliver housing in a sustainable way, to reduce the likely impact on the Green Belt and continue to support a sustainable level of job growth.

10.51 **Table 10.5** lists those sites recommended for allocation in the Local Plan at Welwyn Garden City.

**Table 10.5: Sites proposed for allocation in the emerging Local Plan at Welwyn Garden City as updated in 2019**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
N/A	Han40a	Campus East Car Park	Urban	Considered for allocation	250
N/A	Hol23	Hollybush Lane	Urban	Considered for allocation	16
N/A	Pea97	Former Norton Building	Urban	Considered for allocation	122
N/A	Pea102	Bio-Park, Broadwater Road	Urban	Considered for allocation	179
N/A	Pea103	29 Broadwater Road	Urban	Considered for allocation	128
N/A	Pea104	YMCA, 90 Peartree Lane	Urban	Considered for allocation	15
N/A	Pea105	61 Bridge Road	Urban	Considered for allocation	21
N/A	Pea106	73-83 Bridge Road East	Urban	Considered for allocation	235 dwellings and 1,653sqm B1a
N/A	WGC4a	Land North East of Welwyn Garden City	Green Belt	Considered for allocation as an extension to SDS1	75
SDS1	WGC4/7	Panshanger	ASR	Local Plan 2016 Site	650
SDS2	WGC5	Land SE of WGC	Green Belt	Local Plan 2016 Site. Capacity increased from 1,200 to 1,300	1,300
SDS3	Pea02b	Broadwater Road SPD Site (north)	Urban	Local Plan 2016 Site. Capacity increased to reflect planning permission 6/2018/0171/MAJ	1,403

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
SDS4	Pea02c	Broadwater Road SPD Site (west)	Urban	Local Plan 2016 Site	171
HS1	Pan01b	Land at Bericot Way	Urban	Local Plan 2016 Site. Capacity reduced to reflect planning permission 6/2017/2202/OUTLINE	21
HS2	WGC1	Creswick	Green Belt	Local Plan 2016 Site. Capacity increased to reflect modification following Hearing Session 4	300
HS3	Pea08	80 Bridge Road East	Urban	Local Plan 2016 Site	32
HS4	Hal03	Ratcliff Tail Lift Site	Urban	Local Plan 2016 Site	110
HS5	Hol19	Hyde Valley House, Hyde Valley	Urban	Local Plan 2016 Site	17
MUS1	Han40	WGC Town Centre North site	Urban	Local Plan 2016 Site. Updated for consistency between SADM19 and SADM21	100
HS6	Han91	Land at Gosling Sports Park	Urban	Local Plan 2016 Site	250
HS8	Pea24	St Michael's House, Holwell Road	Urban	Local Plan 2016 Site	22
<b>Total</b>					<b>5,417</b>

10.52 A settlement map has been prepared to illustrate all the above sites including the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 10.1**.

10.53 A map of Welwyn Garden City has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.



## 11. Hatfield

### Draft Local Plan 2016: Sites Proposed for Allocation

- 11.1 There were eight sites proposed for allocation in the Draft Local Plan 2016 for Hatfield. **Table 11.1** identifies whether the sites are located within an urban or Green Belt location. The majority of the sites proposed for allocation at Hatfield are urban sites, with only two within the Green Belt.

**Table 11.1: Sites proposed for allocation in the Draft Local Plan 2016 at Hatfield**

DLP <sup>1</sup> 2016 (Site Ref)	HELAA (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
SDS5	Hat1/Hat13	North West Hatfield	Green Belt	1,650
MUS2	HC100b	1-9 Town Centre	Urban	66
MUS3	HW100	High View (Hilltop) SPD Site	Urban	87
HS9	HE80	Onslow St Audreys School, Howe Dell	Urban	61
HS10	HS31	Garages at Hollyfield	Urban	14
HS11	Hat11	Land at South Way	Green Belt	120
HS13	HS91	Land south of Filbert Close	Urban	37
HS14	HE23	L Kahn Manufacturing, Wellfield Road	Urban	62
<b>Total</b>				<b>2,097</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 11.2 The 2019 site selection process considered **17 additional** sites along with the original Local Plan sites listed in **Table 11.1**.
- 11.3 Eight of the additional sites failed the HELAA stages (Stages 1 and 2), one site was withdrawn from the HELAA process and eight additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 11.2** that lists the sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.
- 11.4 One site is promoted at Hatfield for mixed-use B class development (Hat20) has an assessed potential capacity for a range of additional employment space. However, the employment floor space potential for this site should be viewed as indicative only of the potential type and mix of employment floorspace.

<sup>1</sup> Draft Local Plan 2016



**Table 11.2: Results of Stages 1 and 2 of the Site Selection process (HELAA 2019) at Hatfield.**

HELAA 2019 (site ref)	Site name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
HC08	Lemsford Road	Urban	N/A	32
HC11	Meridian House	Urban	N/A	11
HC95	126 Great North Road	Urban	Unsuitable for mixed use development (appeal dismissed)	0
HC101	Lockley Crescent	Urban	N/A	4
HE17	Link Drive car park and skate park	Urban	N/A	84
HE98	Citroen Garage, Great North Road	Urban / Green Belt	Heritage impacts, noise, highways concerns	0
HSW92	Minster Close	Urban	N/A	49
HSW93	Haseldine Meadows	Urban	Withdrawn	0
HSW94	College Lane (north)	Urban	N/A	115
Hat2	Land west of Hatfield	Green Belt	Loss of country park / S106 issues	0
Hat3	West of Ellenbrook	Green Belt	Heritage impacts	0
Hat4	Land at Wilkins Green Lane	Green Belt	Heritage impacts	0
Hat9	Land at Roehyde	Green Belt	Absence of sustainable travel links. Most of site in St Albans (not proposed for allocation)	0
Hat14	Three Corner Field	Green Belt	Site does not adjoin an excluded settlement	0
Hat19	Land Off Bramble Road	Green Belt	N/A	20
Hat20	Land at Angerland Common (south)	Green Belt	N/A	B1a/b (61,725m <sup>2</sup> ) <b>or</b> B1c (32,920m <sup>2</sup> ), <b>or</b> a mix of B1 class uses, <b>or</b> a mix of B1 and B2 (B2 only as part of a mixed use scheme)
Hat21	Land at Angerland Common (park and ride site)	Green Belt	Site not promoted for housing or employment (B Class)	0
<b>Total</b>				<b>315</b>

### Site Selection 2019: Stage 3 – Detailed Assessment

- 11.5 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Tables 11.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 11.6 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a summary of the findings are presented in the following paragraphs.
- 11.7 Hatfield is considered to be a sustainable settlement, and falls into the second tier of settlements in **Policy SP3: Settlement Hierarchy** demonstrating the town’s sustainability merits following the boroughs main town: Welwyn Garden City. Hatfield provides a range of good public transport connections, a number of services and facilities and acts as a key centre for employment and education in the borough. It has been envisaged that Hatfield, along with Welwyn Garden City, would be the focus for future development in the borough due to the sustainability benefits of these settlements.
- 11.8 The additional sites promoted at Hatfield are in a mixture of urban and Green Belt locations.
- 11.9 The additional urban sites which have been considered at Hatfield, that would result in no change or harm to the Green Belt, have been recommended for allocation unless the site specific assessment identifies evidence that this would not be appropriate.
- 11.10 One site, HC101, is considered suitable for development but is too small to be allocated (below the 10 dwelling threshold for the borough’s towns).
- 11.11 There are two sites identified in the Draft Local Plan 2016 that are located within the Green Belt.
- 11.12 Given the importance of the Green Belt to the Borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development.

- 11.13 Local Plan site SDS5 (Hat1/Hat13) represents the largest strategic allocation in the borough, making a significant contribution to infrastructure and housing delivery in a sustainable location. The release of the whole site from the Green Belt would result in 'Very High' harm (as indicated in Parcel 41 of the Green Belt 3 Study).
- 11.14 However, through restricting the area released for development at SDS5 to be consistent with Parcel 41e (with a boundary joining the commercial development at Oldings Corner to the roundabout at the junction of Green Lane and Coopers Green Lane) any Green Belt harm would be reduced from 'very high' to 'high' harm. This Green Belt boundary would ensure the retention of separation between Hatfield and Stanborough. The development could also be supported with the remaining land within the proposed allocation which would continue to be in the Green Belt, with this land used to deliver Green Infrastructure, school playing fields or other appropriate uses. New Green Belt boundaries could also be formed through effective master-planning and planting to ensure a defensible and clearly defined boundary is developed.
- 11.15 Local Plan site HS11 (Hat11) would result in 'Moderate-High' harm to the Green Belt. However, the land slopes downwards towards the A1001 and development of the lower ground would have a limited impact on the separation between Hatfield and Welham Green. The use of the site's topography to define the new Green Belt boundary would be clearly defined and defensible. The use of a well-landscaped boundary here would also strengthen the Green Belt boundary. The site could accommodate a new 2FE primary school, to meet existing and future demand for school places in Hatfield and the surrounding school planning area.
- 11.16 Given the location of these sites at one of Borough's most sustainable settlements, the significant contribution SDS5 (Hat1/Hat13) makes to the Borough's housing requirement and the relative lack of impact on the Green Belt HS11 (Hat11) has, these sites continue to be supported.
- 11.17 Hat19 is the only additional Green Belt site which is considered suitable, available and achievable. The site would have 'Moderate' harm to the Green Belt. Hat19 adjoins the existing urban edge of Hatfield and is well-contained by development to the north-west and south-east. However, it is considered that development of this site would encroach into the countryside and lead to the perception of narrowing the gap between 1<sup>st</sup> tier settlements Hatfield and St Albans. Therefore, this site is **not** considered appropriate for allocation.
- 11.18 On this basis, and following the detailed Stage 3 assessment, there are five additional sites considered appropriate for allocation in addition to the eight

sites identified in the Local Plan 2016. These are shown by **Table 11.3**, which also lists those sites not considered suitable for allocation following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.

- 11.19 The capacity of five Draft Local Plan 2016 sites has changed to reflect increased capacities which are considered achievable (Hat1/13), or to reflect the granting of planning permissions (HC100b, HW100, HE80). Only one site has decreased in capacity, HS31.

**Table 11.3 Result of Stage 3 detailed assessment at Hatfield**

<b>DLP 2016 (site ref)</b>	<b>HELAA 2019 (site ref)</b>	<b>Site name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
SDS5	Hat1/Hat13	North West Hatfield	Green Belt	Local Plan 2016 site. Dwelling numbers increased to 1,750	Around 1,750
MUS2	HC100b	1-9 Town Centre	Urban	Local Plan 2016 site. Dwelling numbers increased to 71	71
MUS3	HW100	High View (Hilltop) SPD Site	Urban	Local Plan 2016 site. Dwelling numbers increased to 146	146
HS9	HE80	Onslow St Audreys School, Howe Dell	Urban	Planning permission granted for 86 dwellings	86
HS10	HS31	Garages at Hollyfield	Urban	Local Plan 2016 site. Small decrease in capacity	13
HS11	Hat11	Land at South Way	Green Belt	Local Plan 2016 site	120
HS13	HS91	Land south of Filbert Close	Urban	Local Plan 2016 site	37
HS14	HE23	L Kahn Manufacturing, Wellfield Road	Urban	Local Plan 2016 site	62
N/A	HC08	Lemsford Road	Urban	Considered for allocation	32
N/A	HC11	Meridian House	Urban	Considered for allocation	11
N/A	HC101	Lockley Crescent	Urban	Too small to allocate	4
N/A	HE17	Link Drive car park and skate park	Urban	Considered for allocation - Planning Application received	80
N/A	HSW92	Minster Close	Urban	Considered for allocation	49
N/A	HSW94	College Lane (north)	Urban	Considered for allocation	115
N/A	Hat19	Land Off Bramble Road	Green Belt	Impact on the separation of settlements	0
N/A	Hat20	Land at Angerland Common (south)	Green Belt	Harm to Green Belt outweighs the benefits of the site	0
<b>Total</b>					<b>2,576</b>

## **Stage 4 - Settlement Level Assessment**

11.20 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues, and
- Strategic Advantages/ Disadvantages
- Green Belt Matters (exceptional circumstances and Green Belt Boundaries)

11.21 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

11.22 Following the Stage 3 assessment, 13 sites are proposed for allocation in the Local Plan at Hatfield. Eight of these sites were included in the Local Plan 2016, as submitted, and five are additional

11.23 As discussed above, the majority of sites under consideration at Hatfield are urban sites that do not lead to any Green Belt impacts.

### **Key Infrastructure Issues**

11.24 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### ***Secondary Schools***

- 11.25 The strategy for secondary school provision for Hatfield, to accommodate growth as set out in the Draft Local Plan 2016, comprised the construction of a new secondary school within the site at North-west Hatfield SDS5 (Hat1). This school would accommodate either 8FE or 10FE, depending on emerging levels of need from the new developments at Hatfield, and on capacity in existing schools. The additional housing sites now proposed for allocation in Hatfield have an estimated capacity of 475 dwellings, or approximately 0.9FE. It is still anticipated that these numbers could be accommodated within the new school at SDS5 (Hat1).

### ***Primary schools***

- 11.26 The strategy for primary schools in Hatfield, accompanying the Draft Local Plan 2016, envisaged a new 2FE primary school at SDS5 (Hat1) (or 2FE of primary capacity attached to the new secondary school, providing a 'through school') and a 1FE expansion of Green Lanes primary school. A 1FE expansion of the existing De Havilland primary school in south Hatfield was also proposed in order to cater for additional numbers in this part of town.
- 11.27 The above increase in primary school capacity was held unlikely to be entirely sufficient, when considered alongside natural growth, to accommodate the future primary need in Hatfield. Accordingly, a potential site for a further new 2FE primary school was sought, and a site was promoted as part of the housing site HS11 (Hat11) at South Way. This site was agreed to be acceptable to HCC as education authority and a Statement of Common Ground was entered into between the Council, HCC and the landowner regarding provision of the school site.
- 11.28 With the 2019 proposals for an additional 475 dwellings, or approximately 0.9FE, this need can also be met in the new school at HS11 (Hat11).

### ***Highways***

- 11.29 Transport modelling work has been undertaken using Hertfordshire County Council's COMET model to assess increases in congestion and waiting times at key junctions on the network, which are likely to arise as a result of development of the selected Local Plan sites.

- 11.30 By far the most substantial proposed new development at Hatfield is the site at North-west Hatfield; SDS5 or Hat1/Hat13. This can be expected to have a significant impact on the operation of the surrounding highway network, where a number of existing links and junctions are known to become congested at peak times. These links and junctions include Coopers Green Lane, the A1001 Comet Way, Junction 4 of the A1 (M) and the adjoining A414, and the Stanborough roundabouts (B653/A6129) either side of the A1 (M).
- 11.31 The cumulative effect of developments at SDS5 (Hat1) and SDS6 (Hat15) Symondshyde on this road network is likely to be substantial. Highways England, which is responsible for the A1 (M) and its junctions, has not objected to the scale of proposed Local Plan development in this area but has expressed concerns about modelled congestion and waiting times at the nearby motorway junctions.
- 11.32 To mitigate the increased congestion and waiting times, localised highway improvements would be sought. These include a capacity enhancement at the existing Green Lanes/Coopers Green Lane roundabout (one of the schemes specified in the schedule to the Infrastructure Delivery Plan (IDP)) and improved cycle and footpath routes along Coopers Green Lane itself. Relatively small scale highway improvements at the Stanborough roundabouts (B653/A6129) and at Junction 4 of the A1 (M) are also included in the IDP.
- 11.33 The developments at SDS5 (Hat1) and SDS6 (Hat15) offer opportunities to enhance footpath and cycle links and provide a sizeable customer base for a new or re-routed bus service. Subject to active promotion of modal shift and to the above highway measures, HCC as Highway Authority does not consider that the Local Plan development north of Hatfield would have a severe effect on the operation of the highway network.

### ***Utilities***

- 11.34 From a waste water perspective, new development at Hatfield will be served either by Mill Green Sewage Treatment Works (STW), where development is on the northern side of the town (including SDS5 (Hat1)), or by the Blackbirds and Maple Lodge STW for other development.



- 11.35 Thames Water advises that the earliest phases of development at SDS5 (Hat1), which are to the east of Green Lanes, will be able to utilise capacity in the existing sewerage network to drain to Mill Green STW whereas later phases of the development will require network capacity improvements to drain to Mill Green. The increased load from later phases will also require capacity improvements at Mill Green STW, which will be programmed by Thames Water subject to a lead-in time of three to five years from any grant of planning permission.
- 11.36 New development from most of the proposed sites in Hatfield will drain to the Blackbirds and Maple Lodge sewage treatment works in the south-west of the county. During the Plan period, substantial additional development in neighbouring districts, as well as development in Welwyn Hatfield, will drain to these works. Thames Water has raised no issues with infrastructure capacity in relation to the development of these sites, as any improvements to the network or the sewage treatment works will be programmed in, in accordance with the pace of development.
- 11.37 Previous consultations with UK Power Networks (UKPN) as the electricity supply infrastructure provider, have indicated a need to enhance sub-station capacity in the north of Hatfield to meet the requirements of Local Plan growth. An update on the latest position is being sought from UKPN.

### **Strategic Advantages/Disadvantages**

- 11.38 The majority of sites under consideration at Hatfield are not associated with strategic advantages or disadvantages. Some sites are also associated with urban regeneration such as sites MUS2 (HC100b) and MUS3 (HW100).
- 11.39 The largest proposed allocations, as set out in the Draft Local Plan 2016 SDS5 (Hat1/Hat13) would deliver a secondary school, provision for three forms of entry at primary school level and Gypsy and Traveller Site pitches. SDS5 would also deliver a local neighbourhood centre, a number of community facilities including healthcare and leisure and an employment area in a sustainable location. This site therefore makes a significant contribution to strategic infrastructure.
- 11.40 Site Hat11 offers the opportunity to deliver a 2FE Primary School to the south of Hatfield. This would contribute to meeting the existing and future needs in the school planning area.

## **Green Belt Matters**

- 11.41 Consideration is needed for how the Green Belt boundary could be amended to Hatfield, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 11.42 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown in **Appendix A**.
- 11.43 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 11.44 Only two Green Belt sites are proposed for allocation at Hatfield. To reduce the impact of these developments to the lowest reasonable practical extent, the site boundaries have been designed to minimise the level of harm. For example, the Green Belt boundary of site Hat1/13, has been amended to reduce the harm from 'very high' to 'high' as identified in the Green Belt Study (Stage 3). None of the new sites proposed for allocation at Hatfield are within the Green Belt, thus having no impact on the settlements Green Belt boundary.
- 11.45 Taken together, the assessment findings and recommendations, at a site-by-site level, to exclude some sites and to reduce the development areas of others are considered to minimise the impact on the Green Belt to the lowest reasonable practical extent.
- 11.46 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 11.1**.

## **Proportional Distribution**

- 11.47 The proportion of households located at Hatfield is 30.4% of the Borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocation in the Draft Local Plan 2016 was 26.1%

- 11.48 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. However, as the level of growth across the Borough is increasing, the proportionate distribution at Hatfield actually falls slightly to 22.7%. Thus the proportion of growth at Hatfield which is still below the proportionate level of distribution.
- 11.49 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## Conclusions

- 11.50 The site selection process has tested 17 additional sites, in addition to re-appraising those sites proposed in the Draft Local Plan 2016. This work has resulted in five additional sites being proposed for allocation at Hatfield in addition to the eight already proposed in the Local Plan 2016.
- 11.51 Consideration has been given to minimising harm to the Green Belt, to ensure the proposed change to Green Belt boundaries are robust and defensible and that the level of development is sustainable.
- 11.52 Overall, a significant contribution to the Borough's housing requirement is proposed in the urban areas of the settlement, the most sustainable location for development. Overall, this equates relatively closely to the level of growth needed to support a proportional level of distribution at around 21.5% of the total growth proposed across the Borough.
- 11.53 Many of the development sites proposed are urban, some contribute towards urban regeneration and make use of underused spaces within the urban boundary such as back-land developments and surface carparks. Overall, the proposals are considered to balance the need to deliver housing in a sustainable way, to reduce the likely impact on the Green Belt and continue to support a sustainable level of job growth.
- 11.54 **Table 11.4** lists those sites recommended for allocation in the Local Plan at Hatfield.

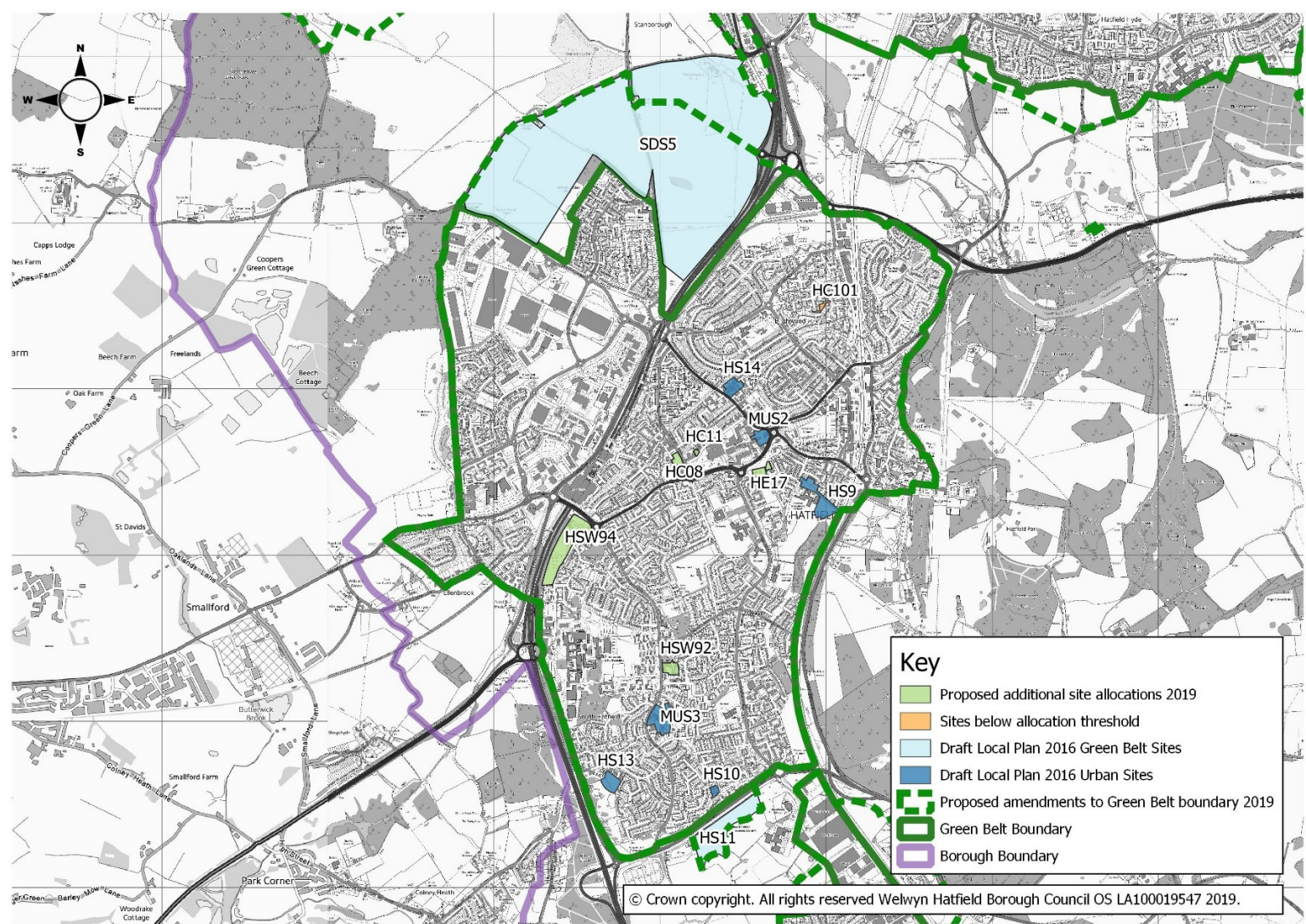
**Table 11.4: Sites proposed for allocation in the emerging Local Plan at Hatfield as updated in 2019**

DLP 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site name	Urban / Green Belt	Notes	Number of Dwellings
SDS5	Hat1/Hat13	North West Hatfield	Green Belt	Local Plan 2016 Site (updated capacity)	Around 1,750
MUS2	HC100b	1-9 Town Centre	Urban	Local Plan 2016 Site (updated capacity)	71
MUS3	HW100	High View (Hilltop) SPD Site	Urban	Local Plan 2016 Site (updated capacity)	146
HS9	HE80	Onslow St Audreys School, Howe Dell	Urban	Local Plan 2016 Site (updated capacity)	86
HS10	HS31	Garages at Hollyfield	Urban	Local Plan 2016 Site (updated capacity)	13
HS11	Hat11	Land at South Way	Green Belt	Local Plan 2016 Site	120
HS13	HS91	Land south of Filbert Close	Urban	Local Plan 2016 Site	37
HS14	HE23	L Kahn Manufacturing, Wellfield Road	Urban	Local Plan 2016 Site	62
N/A	HC08	Lemsford Road	Urban	Considered for allocation	32
N/A	HC11	Meridian House	Urban	Considered for allocation	11
N/A	HE17	Link Drive car park and skate park	Urban	Considered for allocation (planning application received)	80
N/A	HSW92	Minster Close	Urban	Considered for allocation	49
N/A	HSW94	College Lane (north)	Urban	Considered for allocation	115
<b>Total</b>					<b>2,572</b>

11.55 A settlement map has been prepared to illustrate all the above sites including the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 11.1**.

11.56 A map of Hatfield has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

Figure 11.1: Proposed change to Green Belt boundary at Hatfield to inform the emerging WHBC Local Plan as



## 12. Woolmer Green

### Draft Local Plan 2016: Sites Proposed for Allocation

- 12.1 There was one site proposed for allocation in the Draft Local Plan 2016 for this settlement. This is shown by **Table 12.1** that also identifies whether the site is located within an urban or Green Belt location.

**Table 12.1: Sites proposed for allocation in the Draft Local Plan 2016 at Woolmer Green**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS15	WGr1	Land east of London Road	Green Belt	150
<b>Total</b>				<b>150</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 12.2 The 2019 site selection process considered **4 additional** sites, or site options, along with the original Local Plan site listed in **Table 12.1**. None of the additional sites failed the HELAA stages (Stages 1 and 2) and so all four additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. Shown by **Table 12.2**.
- 12.3 There were no sites at Woolmer Green found suitable for employment uses.

**Table 12.2: Results of Stages 1 and 2 of the Site Selection process (HELAA 2019) at Woolmer Green**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
WE100	51-53 London Road, Knebworth	Urban	N/A	34
WGr3	Land at 52 London Road	Green Belt	N/A	40
WGr7	Land north of Heath Road	Green Belt	N/A	117*
WGr7a	Land north of Heath Road	Green Belt	N/A	69*
<b>Total</b>				<b>191*</b>

\*Where scenarios apply, only one capacity figure is included (in this case, the highest), in total to avoid double counting.

## Site Selection 2019: Stage 3 – Detailed Assessment

- 12.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 12.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 12.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 12.6 Woolmer Green falls into the fourth tier of settlements in **Policy SP3: Settlement Hierarchy** of smaller villages excluded (inset) from the Green Belt, thus reflecting their lower relative sustainability compared to the larger villages such as Brookmans Park or Welham Green.
- 12.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 12.8 Two of the additional sites under consideration (WGr7 and WGr7a) would lead to ‘high’ harm to the Green Belt if released for development. The parcel of land in question is important to maintain some degree of distinction between Oaklands and Mardley Heath and Woolmer Green and development here would lead to weaker Green Belt boundaries to the north of the parcel. Developing the smaller area of WGr7a in comparison to WGr7 would not reduce the level of harm or reduce the impact on separation. For these reasons these sites are not considered appropriate for allocation.
- 12.9 The site WGr3 would lead to ‘high’ harm if allocated in its entirety, but the Green Belt Study (Stage 3) identifies that limiting development to the northern part of the site, having the effect of restricting development from an estimated 40 dwellings to 25 dwellings, would reduce the harm to ‘moderate’. Following the detailed assessment, it is considered that the site is appropriate for allocation, providing that development does not extend further south than the existing Green Belt boundary to the east of London Road.

- 12.10 The site included in the Local Plan 2016 HS15 (WGr1) falls within a high harm parcel in the Green Belt Study (Stage 3), but the site itself is classified as leading to a 'moderate – high' level of harm if released. A landscape buffer to the north of the site is proposed, which would sit below the ridge of the gently rising landform. It is considered that the new boundary, once established by the new access road, property boundaries and the new landscape buffer, would not result in any weakening compared to the existing. This site relates well to the settlement and continues to be recommended for allocation.
- 12.11 The final site under consideration in Woolmer Green is classified as an urban site, thus leading to no Green Belt impacts. The site is currently in employment, although not primary B class, use but is considered appropriate for allocation. This is discussed further under the Strategic Advantages and Disadvantages heading later in this section.
- 12.12 On this basis, and following the detailed Stage 3 assessment, two of the additional sites are considered appropriate for allocation, in addition to the one site identified in the Local Plan 2016. These are shown by **Table 12.3**, which also lists those sites not considered for allocation following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.



**Table 12.3: Result of the Stage 3 detailed assessment at Woolmer Green**

<b>Draft Local Plan (Site Ref)</b>	<b>HELAA 2019 (Site Ref)</b>	<b>Site Name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
N/A	WE100	51-53 London Road, Knebworth	Urban	N/A	34
N/A	WGr3	Land at 52 London Road	Green Belt	Development reduced to the northern part of site to limit Green Belt harm.	25
N/A	WGr7	Land north of Heath Road	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	WGr7a	Land north of Heath Road	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
HS15	WGr1	Land east of London Road	Green Belt	Local Plan 2016 Site	150
<b>Total</b>					<b>209</b>

#### **Stage 4 - Settlement Level Assessment**

12.13 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

- 12.14 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors.
- 12.15 Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

- 12.16 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### **Secondary Schools**

- 12.17 Hertfordshire County Council (HCC) has updated its secondary school strategy in order to address the additional housing growth proposed in 2019. This updated strategy is set out in **Section 10** relating to Welwyn Garden City, as the Welwyn area, including Woolmer Green, will rely mainly on secondary schools within Welwyn Garden City.

### **Primary schools**

- 12.18 Primary school capacity in Woolmer Green is considered alongside that serving Welwyn and Oaklands/Mardley Heath. The total 2019 proposed growth across these settlements, including the 2016 figures, would equate to approximately 1.1FE. This would be addressed by a 1FE expansion of Welwyn St. Mary's School, which has capacity to facilitate this expansion. Some additional capacity for this primary school planning area may also become available through the construction of a new 2FE primary school at Knebworth through the North Herts District Plan. This could be particularly relevant to Woolmer Green, as the settlement closest to Knebworth.

### **Highways**

- 12.19 In terms of effect on the wider highway network and latest transport modelling, HCC as Highway Authority has not identified any severe impacts arising from the additional housing growth proposed at Woolmer Green. The Infrastructure Delivery Plan (IDP) schedule currently identifies local capacity improvements to the roundabouts and link roads around A1 (M) Junction 6 (including the Clock Roundabout) as recommended infrastructure to support growth. This

would require joint working with Highways England. Construction of Highways England's 'smart motorway' scheme to increase vehicle capacity on the A1 (M) between Junctions 6 and 8 is due to start in 2020/2021.

### ***Utilities***

- 12.20 There are no specific utilities infrastructure issues identified in association with increased growth at Woolmer Green. From a sewage treatment point of view, new development in Woolmer Green will drain to Rye Meads sewage works. A number of local authorities within the Rye Meads catchment are proposing significant housing growth. Based on current growth forecasts, Thames Water's recent high level assessment indicates that from a final effluent stream point of view the sewage treatment works is expected to have capacity up to 2036.

### **Strategic Advantages/Disadvantages**

- 12.21 There are very few strategic advantages or disadvantages associated with the proposed development sites at Woolmer Green. Site HS15 (WGr1) offers potential to include a small farm shop/cafe, which when the plan was submitted, was considered to offer a local benefit. However, this is not in itself significant enough to affect the conclusion for whether the site is considered appropriate, or not, for allocation. Further, since the plan was submitted for examination, an appeal has been allowed for the Entech House site in London Road. This includes provision for 657sqm of retail floorspace, which will increase and enhance the retail offer in this village.
- 12.22 The site WE100 forms part of a proposed employment area (EA10) in the Draft Local Plan 2016. Its primary use is a car dealership and so the allocation of this site would result in some loss of (non-B class use) employment land. However, the site is an urban site where any development would have no impact on the Green Belt and following detailed assessment, it is considered that on balance, the allocation of the site to housing is justified as the current employment use is low density (non B class use). Further, a nearby site has been granted permission on appeal for a mixed use scheme of housing, retail and a reduced level of employment floor space, and so any loss of employment on site WE100 would be relatively modest.

### **Green Belt Matters**

- 12.23 Following the Stage 3 assessment, three sites are proposed for allocation in the Local Plan at Woolmer Green. One of these sites was included in the Local Plan 2016, as submitted, and two are additional.

- 12.24 Consideration is needed for how the Green Belt boundary could be amended to Woolmer Green as a whole, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 12.25 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 12.26 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 12.27 As discussed, any sites falling within 'high' harm parcels are either not considered appropriate for allocation (WGr7 and WGr7a) or are proposed to be reduced in scale to ensure that any impacts are minimised to the lowest reasonably practical extent, and below the 'high' harm threshold. This includes scaling back development at WGr3 to extend no further south than existing Green Belt boundary to the east of London Road and incorporating a landscape buffer to the north of HS15 (WGr1) and to develop robust and defensible boundaries.
- 12.28 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 12.1**.

### **Proportional Distribution**

- 12.29 The proportion of households located at Woolmer Green is 1.3% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 1.9%, thus the original local plan, as submitted, was proposing a level of growth above that necessary to achieve a proportional distribution.
- 12.30 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the Draft Local Plan, as submitted in 2017. However, the next most sustainable locations for development will be at the

large excluded (inset) villages, such as Woolmer Green, rather than lower tier settlements.

- 12.31 Therefore, even though the level of development at Woolmer Green is proposed to increase, as the level of development increases more elsewhere, the proportion actually comes down to 1.8%. On this basis, the proposed changes to the Local Plan allocations set out in this paper, help to make the level of proposed development at Woolmer Green more closely aligned to a proportional distribution of growth.
- 12.32 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

### **Conclusions**

- 12.33 The site selection process has tested 4 additional sites, or site options, in addition to re-appraising the site proposed in the Local Plan 2016. This work has resulted in two additional sites being proposed for allocation at Woolmer Green, in addition to the one site already proposed in the Local Plan 2016.
- 12.34 One of the proposed sites would involve some loss of existing employment uses, but due to the absence of impact on the Green Belt (as it is an urban site) and because of the relatively modest loss of employment, it is considered that allocating the site for housing is appropriate.
- 12.35 No sites, as proposed, would fall within a 'high' harm parcel as development is limited to areas that would lead to lower harm and include appropriate mitigation, such as the landscape buffer to the north of WGr1. It is considered that on balance, and following the detailed assessment, that allocation of the sites as proposed is justified.
- 12.36 **Table 12.4** lists those sites recommended for allocation in the Local Plan at Woolmer Green.

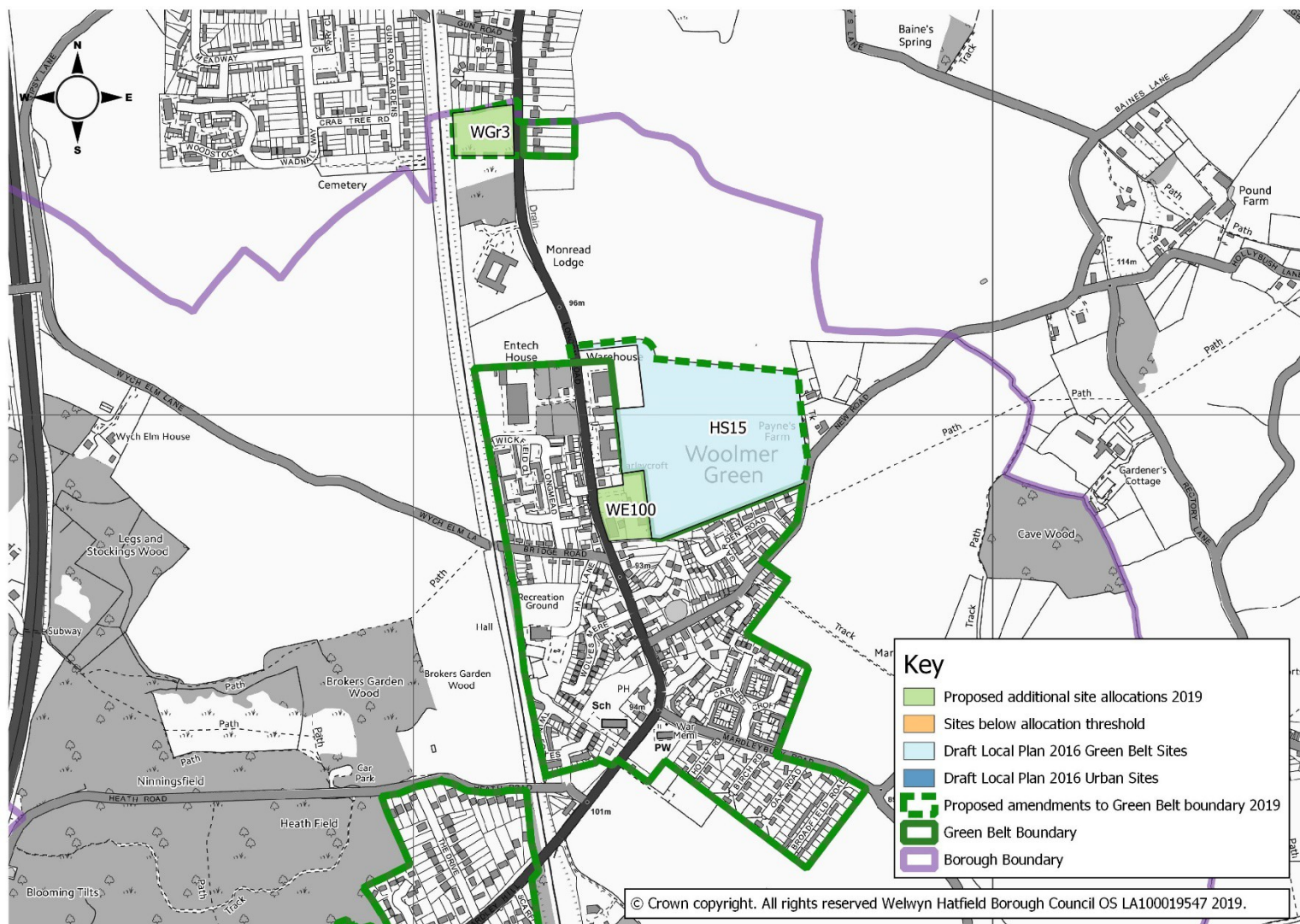
**Table 12.4: Sites proposed for allocation in the emerging Local Plan at Woolmer Green as updated in 2019**

Draft Local Plan (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
N/A	WE100	51-53 London Road, Knebworth	Urban	Considered for allocation	34
N/A	WGr3	Land at 52 London Road	Green Belt	Considered for allocation. Development reduced to the northern part to limit Green Belt harm.	25
HS15	WGr1	Land east of London Road	150	Local Plan 2016 Site	150
<b>Total</b>					<b>209</b>

12.37 A map of Woolmer Green has been prepared to illustrate all the above sites including the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by Figure 12.1.

12.38 A map of Woolmer Green has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

**Figure 12.1: Proposed change to Green Belt boundary at Woolmer Green to inform the emerging WHBC Local Plan as updated in 2019.**



## 13. Oaklands and Mardley Heath

### Draft Local Plan 2016: Sites Proposed for Allocation

- 13.1 There were three sites proposed for allocation in the Draft Local Plan 2016 for this settlement. This is shown by Table 13.1 that also identifies whether the sites are located within an urban or Green Belt location.

**Table 13.1: Sites proposed for allocation in the Draft Local Plan 2016 at Oaklands and Mardley Heath**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS16	OMH8	2 Great North Road	Green Belt	5
HS32	GTLAA04	Four Oaks, Great North Road	Green Belt	6 pitches
HS17	OMH5	Land rear of 2-12 Great North Road	Green Belt	20
<b>Total</b>				<b>25 dwellings + 6 pitches</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 13.2 The 2019 site selection process considered **three additional sites** along with the original Local Plan sites listed in **Table 13.1**. One of the additional sites failed the HELAA stages (at Stage 2) and two additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 13.2**.
- 13.3 There were no sites proposed at Oaklands and Mardley Heath for employment uses and so this is not considered further in this section.

**Table 13.2: Results of Stages 1 and 2 of the Site Selection process (HELAA 2019) at Oaklands and Mardley Heath**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
OMH6	Land adjacent to Danesbury Lodge	Green Belt	Unsuitable access	0
OMH7	22 the Avenue	Green Belt	N/A	2
OMH9	Land r/o 19-23 The Avenue	Green Belt	N/A	12
<b>Total</b>				<b>14</b>



### Site Selection 2019: Stage 3 – Detailed Assessment

- 13.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 13.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 13.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 13.6 Oaklands and Mardley Heath falls into the fourth tier of settlements in **Policy SP3: Settlement Hierarchy** of smaller villages excluded (inset) from the Green Belt, thus reflecting their lower relative sustainability compared to the larger villages such as Brookmans Park or Welham Green.
- 13.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 13.8 Neither of the additional sites being considered (OMH7 or OMH9) fall into a ‘high’ harm category. However, their geographical location is to the west of the A1 (M). On this basis, the allocation of these sites would result in breaching the very strong physical boundary provided by the motorway and resultant changes to the Green Belt leading to a much larger area to the west of the motorway needing to be inset. On balance, it is not considered that the potential to deliver 14 dwellings on two small sites, which would make only a minor contribution to housing land supply in the borough, amounts to exceptional circumstances to justify breaching this strong boundary to the Green Belt and so neither site is proposed for allocation.
- 13.9 The three sites identified in the Local Plan 2016 HS17 (OMH5), HS16 (OMH8) and HS32 (GTLAA04) all fall into the same area to the south west of Oaklands and Mardley Heath between the A1 (M) and Great North Road, part of which is already previously developed. These sites are all relatively well contained, have existing strong boundaries and their development would lead to ‘moderate – low’ harm to the Green Belt. The release of these sites would

have very little impact on the separation between settlements where the presence of the A1 (M) provides a strong physical break between Welwyn and Oaklands and Mardley Heath. For these reasons, these sites continue to be considered appropriate for allocation.

- 13.10 On this basis, and following the detailed Stage 3 assessment, none of the additional sites are considered appropriate for allocation, and one would be below the threshold for allocation in any event. The three sites identified in the Local Plan 2016 continue to be recommended for allocation. These are shown by **Table 13.3**, which also lists those sites not considered for allocation following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.

**Table 13.3: Result of the stage 3 detailed assessment at Oaklands and Mardley Heath**

Draft Local Plan site ref	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Site Selection 2019 capacity
HS17	OMH5	Land rear of 2-12 Great North Road	Green Belt	Local Plan 2016 Site	20
HS32	GTLAA04	Four Oaks, Great North Road	Green Belt	Local Plan 2016 Site	6 pitches
HS16	OMH8	2 Great North Road	Green Belt	Local Plan 2016 Site	5
N/A	OMH7	22 the Avenue	Green Belt	Too small to allocate, changes to Green Belt boundary not justified	2
N/A	OMH9	Land r/o 19-23 The Avenue	Green Belt	Changes needed to the Green Belt boundary are not justified	0
<b>Total</b>					<b>27 dwellings + 6 pitches</b>

## **Stage 4 - Settlement Level Assessment**

13.11 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages / Disadvantages , and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

13.12 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors.

13.13 Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

13.14 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### ***Secondary Schools***

13.15 Hertfordshire County Council (HCC) has updated its secondary school strategy in order to address the additional housing growth proposed in 2019. This updated strategy is set out in Section 10 relating to Welwyn Garden City, as the Oaklands and Mardley Heath area will rely mainly on secondary schools within Welwyn Garden City.

### ***Primary schools***

13.16 Primary school capacity at Oaklands and Mardley Heath is considered alongside that serving Woolmer Green and Welwyn. The total 2019 proposed growth across these settlements, including the 2016 figures, would equate to

approximately 1.1FE. This would be addressed by a 1FE expansion of Welwyn St. Mary's School, which has capacity to facilitate this expansion. Some additional capacity for this primary school planning area may also become available through the construction of a new 2FE primary school at Knebworth through the North Herts District Plan.

### **Highways**

- 13.17 In terms of effect on the wider highway network and latest transport modelling, HCC as Highway Authority has not identified any severe impacts arising from the additional housing growth proposed at Oaklands and Mardley Heath. The Infrastructure Delivery Plan (IDP) schedule currently identifies local capacity improvements to the roundabouts and link roads around A1 (M) Junction 6 (including the Clock Roundabout) as recommended infrastructure to support growth. This would require joint working with Highways England. Construction of Highways England's 'smart motorway' scheme to increase vehicle capacity on the A1 (M) between Junctions 6 and 8 is due to start in 2020/2021.

### **Utilities**

- 13.18 There are no specific utilities infrastructure issues identified in association with increased growth at Oaklands and Mardley Heath. From a sewage treatment point of view, new development in Oaklands and Mardley Heath will drain to Rye Meads sewage works. A number of local authorities within the Rye Meads catchment are proposing significant housing growth. Based on current growth forecasts, Thames Water's recent high level assessment indicates that from a final effluent stream point of view the sewage treatment works is expected to have capacity up to 2036.

### **Strategic Advantages/Disadvantages**

- 13.19 There are no strategic advantages or disadvantages associated with any of the proposed development sites at Oaklands and Mardley Heath and this is not considered further.

### **Green Belt Matters**

- 13.20 Following the Stage 3 assessment, three sites are proposed for allocation in the Local Plan at Oaklands and Mardley Heath consistent with the Local Plan 2016, as submitted.
- 13.21 Consideration is needed for how the Green Belt boundary could be amended to Oaklands and Mardley Heath as a whole, to ensure, in accordance with

national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.

- 13.22 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 13.23 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 13.24 As discussed above, the three sites proposed for allocation would lead to very limited impacts on the Green Belt, especially as they are enclosed with strong boundaries provided by the A1 (M) and Great North Road.
- 13.25 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 13.1**.

### **Proportional Distribution**

- 13.26 The proportion of households located at Oaklands and Mardley Heath is 2.7% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 0.4%, thus the original local plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.
- 13.27 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the original local plan, as submitted. However, the next most sustainable locations for development will be at the large excluded (inset) villages rather than lower tier settlements such as Oaklands and Mardley Heath.
- 13.28 Therefore, even though the level of development at Oaklands and Mardley Heath is not proposed to change, as the level of development increases elsewhere, the proportion actually comes down to 0.3%. On this basis, the

level of growth proposed at Oaklands and Mardley Heath continues to be below a level necessary to achieve a proportional distribution of growth.

- 13.29 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## Conclusions

- 13.30 The site selection process has tested three additional sites, in addition to re-appraising the sites proposed in the Local Plan 2016. This work has resulted in no additional sites being proposed for allocation at Oaklands and Mardley Heath. The three sites already proposed in the Local Plan 2016 continue to be recommended for allocation.
- 13.31 The three sites proposed for allocation would lead to very limited impacts on the Green Belt. The settlement falls within the fourth tier within the Settlement Hierarchy and is suitable and sustainable for some development. The level of development proposed falls somewhat below that necessary to achieve a proportional level of growth, but is considered appropriate for this settlement.
- 13.32 **Table 13.4** lists those sites recommended for allocation in the Local Plan at Oaklands and Mardley Heath.

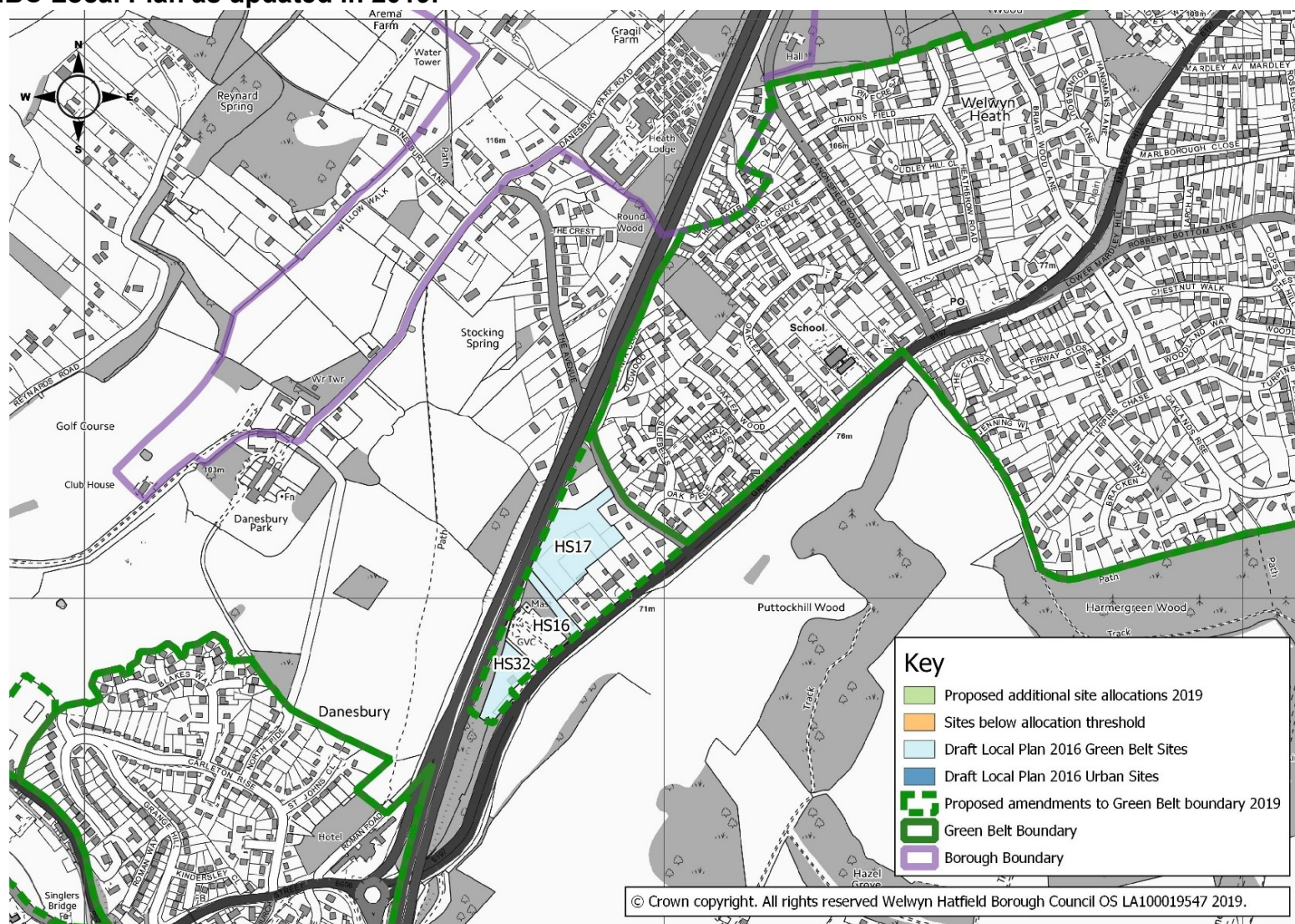
**Table 13.4: Sites proposed for allocation in the emerging Local Plan at Oaklands and Mardley Heath as updated in 2019.**

Draft local plan site ref	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Site Selection 2019 capacity
HS17	OMH5	Land rear of 2-12 Great North Road	Green Belt	Local Plan 2016 Site	20
HS32	GTLAA04	Four Oaks, Great North Road	Green Belt	Local Plan 2016 Site	6 pitches
HS16	OMH8	2 Great North Road	Green Belt	Local Plan 2016 Site	5
<b>Total</b>					<b>25 dwellings + 6 pitches</b>

- 13.33 A settlement map has been prepared to illustrate all the above sites for allocation, along with the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by Figure 13.1.

13.34 A map of Oaklands and Mardley Heath has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

**Figure 13.1: Proposed change to Green Belt boundary at Oaklands and Mardley Heath to inform the emerging WHBC Local Plan as updated in 2019.**





## 14. Welwyn

### Draft Local Plan 2016: Sites Proposed for Allocation

- 14.1 There were three sites proposed for allocation in the Draft Local Plan 2016 for Welwyn. These are listed in **Table 14.1** that also identifies whether the sites are located within an urban or Green Belt location.

**Table 14.1: Sites proposed for allocation in the Draft Local Plan 2016 at Welwyn**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS18	Wel11	The Vineyards	Green Belt	30
HS19	Wel4	Sandyhurst	Green Belt	30
HS20	Wel3	School Lane	Green Belt	7
Total				67

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 14.2 The 2019 site selection process considered 11 additional sites, or site options, along with the original Local Plan sites listed in Table 14.1. Five of the additional sites failed the HELAA stages (Stages 1 and 2) and six additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 14.2** that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.
- 14.3 There were no sites proposed at Welwyn for employment uses and so this is not considered further in this section.

**Table 14.2: Results of Stages 1 and 2 of the Site Selection process (HELAA 2019) at Welwyn**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
Wel1	Land at Kimpton Road	Green Belt	N/A	178
Wel2	Land adjoining Welwyn Cemetery	Green Belt	N/A	40
Wel6	Land at Kimpton Road	Green Belt	N/A	14
Wel14	Linces Farm (Site 1), north of Wilshere Road and Wilga Road	Green Belt	Impact on Heritage assets	0
Wel14a	Linces Farm, land north-west of Wilshere Road (site 2)	Green Belt	Impact on Heritage assets	0
Wel14b	Linces Farm, land west of Wilshere Road and north of School Lane (site 3)	Green Belt	N/A	20
Wel15	Land at Fulling Mill Lane	Green Belt	N/A	14
Wel15a	Land at Fulling Mill Lane and south of Riverside	Green Belt	Impact on Heritage assets and highways issues.	0
Wel16	Land at School Lane	Green Belt	N/A	65
Wel17	Land at White Hill	Green Belt	Site does not adjoin an excluded settlement	0
No site reference	Low Welwyn Reservoir, north of Tudor Road	Green Belt	Site is below the site size and promoted capacity threshold	0
<b>Total</b>				<b>331</b>

### Site Selection 2019: Stage 3 – Detailed Assessment

- 14.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 14.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 14.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 14.6 Welwyn is considered to be a sustainable settlement, being a large village excluded (inset) from the Green Belt and offering a range of services and facilities, employment and good public transport. This settlement falls into the third tier of settlements in **Policy SP3: Settlement Hierarchy** demonstrating its relative sustainability merits following the two main towns as Welwyn Garden City and Hatfield.
- 14.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study are not considered for allocation in the emerging Local Plan.
- 14.8 For these reasons sites Wel14b and Wel16 are ruled out at Stage 3 as not being appropriate for allocation. Both sites fall within Parcel 8 within the Green Belt Study (Stage 3) that would result in ‘high’ harm to the Green Belt if released for development. The parcel is open and rural in character and release of these sites for development would lead to encroachment of the countryside.

- 14.9 The three sites identified in the Draft Local Plan 2016, as submitted, fall into lower harm parcels. HS19 (Wel4) falls within a 'moderate – low' parcel and is contained by residential development to the north and west and the A1 (M) to the east. HS18 (Wel11) falls within a 'moderate' parcel and is contained to the south east by the urban area of Welwyn and to the north by Danesbury Park Local Nature Reserve. Whilst HS20 (Wel3) falls within a 'moderate – high' parcel and is more open, it does include existing development and is located within a well-treed setting, thus the impact of development on this site HS20 (Wel3) is less than for the adjoining sites (Wel14b and Wel16). Overall, Green Belt impact from developing these sites is generally more limited and the allocation of these sites continues to be supported.
- 14.10 The sites Wel1, Wel2, Wel6 and Wel15 are adjoining and all fall within a 'moderate – high' parcel (P7a). Release of these sites would lead to some encroachment of the countryside, however, the sites are relatively enclosed and do not contribute to purposes 1, 2 or 4 and the strength of the remaining Green Belt boundary is considered by the Green Belt Study (Stage 3) to be similar to the existing boundaries.
- 14.11 The combination of these sites facilitates a coherent and comprehensive approach to master-planning the sites together and Wel1 and Wel2 are of sufficient scale to viably deliver a package of highway improvements, including a new two lane vehicular crossing of the River Mimram which would be necessary to deliver these sites in combination. Wel15 and Wel16 are not (on their own) of a sufficient scale to deliver the highway upgrades that are necessary to facilitate housing growth in this location and could not therefore come forward in isolation of Wel1 and Wel2. Sites Wel1 and Wel2 also present an opportunity to make additional parking provision for the local cemetery. Allocating these sites makes a significant contribution to meeting the borough's housing requirement in one of the most sustainable larger villages and thus avoiding more damaging impact on the Green Belt elsewhere. The allocation of these sites is therefore supported.
- 14.12 The capacity of the Draft Local Plan 2016 site HS20 (Wel3) is increased from 7 to 9 dwellings, although the capacity could increase slightly if it is decided that the water pumping station can be re-located in the longer term.
- 14.13 On this basis, and following the detailed Stage 3 assessment, there are four additional sites considered appropriate for allocation in addition to the three sites identified in the Local Plan 2016. These are shown by **Table 14.3**, which also lists those sites not considered suitable for allocation following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.

**Table 14.3: Result of the Stage 3 detailed assessment at Welwyn**

Draft Local Plan (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
N/A	Wel1	Land at Kimpton Road	Green Belt	N/A	178
N/A	Wel2	Land adjoining Welwyn Cemetery	Green Belt	N/A	40
HS20	Wel3	School Lane	Green Belt	Local Plan 2016 Site. Capacity increased to 9.	9
HS19	Wel4	Sandyhurst	Green Belt	Local Plan 2016 Site	30
N/A	Wel6	Land at Kimpton Road	Green Belt	Only in combination with Wel1 and Wel2	14
HS18	Wel11	The Vineyards	Green Belt	Local Plan 2016 Site	30
N/A	Wel14b	Linces Farm, land west of Wilshire Road and north of School Lane (site 3)	Green Belt	If allocated alongside Wel3 the Harm to the Green Belt outweighs the benefits of the site.	0
N/A	Wel15	Land at Fulling Mill Lane	Green Belt	Only in combination with Wel1 and Wel2	14
N/A	Wel16	Land at School Lane	0	Harm to the Green Belt outweighs the benefits of the site	0
<b>Total</b>					<b>315</b>

#### **Stage 4 - Settlement Level Assessment**

14.14 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages , and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

- 14.15 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Green Belt Matters**

- 14.16 Following the Stage 3 assessment, seven sites are proposed for allocation in the Local Plan at Welwyn. Three of these sites were included in the Local Plan 2016, as submitted, and four are additional.
- 14.17 Consideration is needed for how the Green Belt boundary could be amended at Welwyn as a whole, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 14.18 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 14.19 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 14.20 As discussed, it is considered that Green Belt impacts can be reduced to the lowest reasonably practical extent by excluding sites for allocation that lead to 'high' harm, by ensuring that the sites proposed for allocation at Welwyn lead to more limited impacts, mainly due to the contained nature of the sites and/or the likelihood that Green Belt boundaries will remain similar in strength to the existing.
- 14.21 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 14.1**.

## **Key Infrastructure Issues**

- 14.22 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### ***Secondary Schools***

- 14.23 Hertfordshire County Council (HCC) has updated its secondary school strategy in order to address the additional housing growth proposed in 2019. This updated strategy is set out in Section 10 relating to Welwyn Garden City, as the Welwyn area will rely mainly on secondary schools within Welwyn Garden City.

### ***Primary schools***

- 14.24 Primary school capacity in Welwyn is considered alongside that serving Woolmer Green and Oaklands/Mardley Heath. The total 2019 proposed growth across these settlements, including the 2016 figures, would equate to approximately 1.1FE. This would be addressed by a 1FE expansion of Welwyn St. Mary's School, which has capacity to facilitate this expansion. Some additional capacity for this primary school planning area may also become available through the construction of a new 2FE primary school at Knebworth through the North Herts District Plan.

### ***Highways***

- 14.25 In terms of effect on the wider highway network and latest transport modelling, HCC as Highway Authority has not identified any severe impacts arising from the additional housing growth proposed at Welwyn. The Infrastructure Delivery Plan (IDP) schedule currently identifies local capacity improvements to the roundabouts and link roads around A1 (M) Junction 6 (including the Clock Roundabout) as recommended infrastructure to support growth. This would require joint working with Highways England. Construction of Highways England's 'smart motorway' scheme to increase vehicle capacity on the A1 (M) between Junctions 6 and 8 is due to start in 2020/2021.

## ***Utilities***

- 14.26 There are no specific utilities infrastructure issues identified in association with increased growth at Welwyn. From a sewage treatment point of view, new development in Welwyn will drain to Rye Meads sewage works. A number of local authorities within the Rye Meads catchment are proposing significant housing growth. Based on current growth forecasts, Thames Water's recent high level assessment indicates that from a final effluent stream point of view the sewage treatment works is expected to have capacity up to 2036

## **Strategic Advantages/Disadvantages**

The majority of sites under consideration at Welwyn do not offer any strategic advantages or disadvantages. The sites Wel1, Wel2, Wel6 and Wel15 offer some potential to be master-planned as a single coherent site but could only come forward where a package of highway upgrades, including a two lane vehicular bridge over the River Mimram could be delivered. Only Wel1 and Wel2 are of sufficient scale to viably deliver this package, Wel15 and Wel6 could only come forward in combination with Wel1 and Wel2. Sites Wel1 and Wel2, also provide an opportunity to improve parking provision at the neighbouring church.

## **Green Belt Matters**

- 14.27 Following the Stage 3 assessment, seven sites are proposed for allocation in the Local Plan at Welwyn. Three of these sites were included in the Local Plan 2016, as submitted, and four are additional.
- 14.28 Consideration is needed for how the Green Belt boundary could be amended at Welwyn as a whole, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 14.29 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 14.30 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.



- 14.31 As discussed, it is considered that Green Belt impacts can be reduced to the lowest reasonably practical extent by excluding sites for allocation that lead to 'high' harm, by ensuring that the sites proposed for allocation at Welwyn lead to more limited impacts, mainly due to the contained nature of the sites and/or the likelihood that Green Belt boundaries will remain similar in strength to the existing.
- 14.32 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 14.1**.

### **Proportional Distribution**

- 14.33 The proportion of households located at Welwyn is 3.4% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 0.8%, thus demonstrating that the original local plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.
- 14.34 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the Draft Local Plan, as submitted, and because the next most sustainable locations for development will be at the large excluded (inset) villages, such as Welwyn.
- 14.35 For the reasons set out above, it is inevitable that the proportion of growth at Welwyn is increased by proposing additional development sites at these settlements. As a result of the sites proposed in this paper, the proportion goes up to 2.6%, which remains below a level necessary to achieve proportional distribution across the borough as a whole.
- 14.36 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 2.5**.

## Conclusions

- 14.37 The site selection process has tested 11 additional sites, or site options, in addition to re-appraising those sites proposed in the Draft Local Plan 2016. This work has resulted in four additional sites being proposed for allocation at Welwyn in addition to the three already proposed in the Draft Local Plan 2016. The number of dwellings to be delivered at the Draft Local Plan 2016 site HS20 (Wel3) is increased from 7 to 9, although the capacity could increase slightly if it is decided the water pumping station can be re-located in the longer term.
- 14.38 Consideration has been given to minimising harm to the Green Belt, to ensure the proposed change to Green Belt boundaries are robust and defensible and that the level of development is sustainable. Welwyn is one of the most sustainable settlements within the borough and is classified as a 'large excluded village' sitting below the borough's two main towns in **Policy SP3: Settlement Hierarchy**.
- 14.39 The additional sites offer the potential to be master-planned together and contribute to highway improvements, a new two lane vehicular bridge over the River Mimram and creating additional parking at the local cemetery.
- 14.40 Proportionally, the increased level of growth proposed still remains below a level necessary to achieve a proportional distribution across the Borough as whole (2.6 % vs. 3.4 %). Overall, the allocations are considered to be justified, help to contribute towards the borough's housing requirement in a sustainable location and help to minimise higher levels of harm to the Green Belt if more development was necessary elsewhere.
- 14.41 **Table 14.4** lists those sites recommended for allocation in the Local Plan at Welwyn.

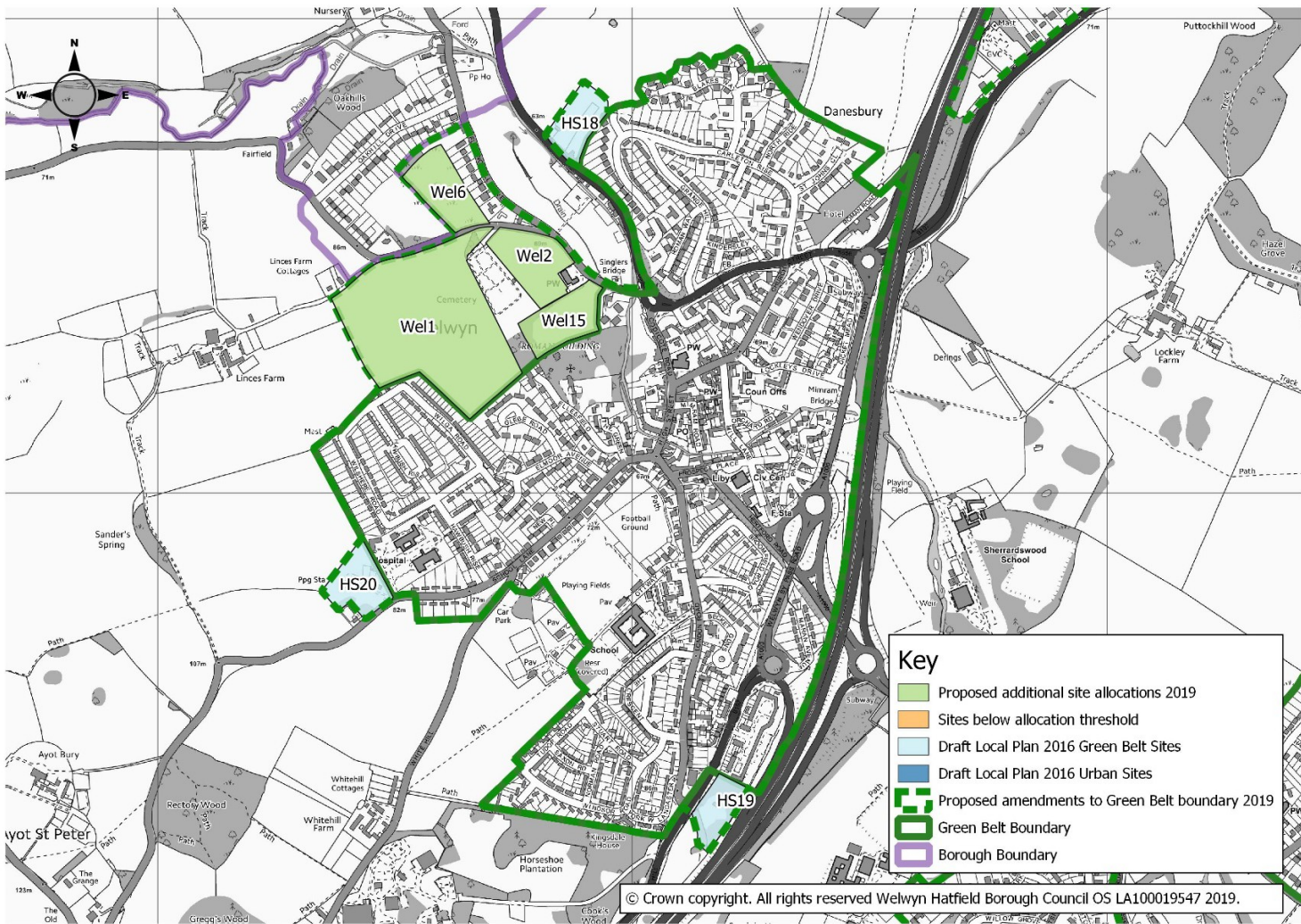
**Table 14.4: Sites proposed for allocation in the emerging Local Plan at Welwyn as updated in 2019**

Draft Local Plan (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
N/A	Wel1	Land at Kimpton Road	Green Belt	Considered for allocation	178
N/A	Wel2	Land adjoining Welwyn Cemetery	Green Belt	Considered for allocation	40
HS20	Wel3	School Lane	Green Belt	Local Plan 2016 Site. Update to capacity	9
HS19	Wel4	Sandyhurst	Green Belt	Local Plan 2016 Site	30
N/A	Wel6	Land at Kimpton Road	Green Belt	Considered for allocation	14
HS18	Wel11	The Vineyards	Green Belt	Local Plan 2016 Site	30
N/A	Wel15	Land at Fulling Mill Lane	Green Belt	Considered for allocation	14
<b>Total</b>					<b>315</b>

14.42 A settlement map has been prepared to illustrate all the above sites along with the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 14.1**.

14.43 A map of Welwyn has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

**Figure 14.1: Proposed change to Green Belt boundary at Welwyn to inform the emerging WHBC Local Plan as updated in 2019**



## 15. Lemsford

### Draft Local Plan 2016: Sites Proposed for Allocation

- 15.1 There were no sites proposed for allocation in the Draft Local Plan 2016 for this settlement.

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 15.2 The 2019 site selection process considered four additional sites, or site options. Two of the additional sites failed the HELAA stages (Stages 1 and 2) and two additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 15.1** that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 15.1: Results of Stages 1 and 2 (HELAA 2019) of the site selection process at Lemsford.**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
StL5	Land at Lemsford Archery Club	Green Belt	Heritage issues	0
StL5a	Land at Lemsford Archery Club and adjoining land	Green Belt	Heritage issues	0
StL13	Land at Roebuck Farm	Green Belt	N/A	27
StL16	Land adjacent Lemsford School	Green Belt	N/A	14
<b>Total</b>				<b>41</b>

- 15.3 There were no sites proposed at Lemsford for employment uses and this matter is not considered further.

### Site Selection 2019 Stage 3 – Detailed Assessment

- 15.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 15.1**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.

- 15.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 15.6 Lemsford was classified in **Policy SP3: Settlement Hierarchy**, as originally drafted, as a 'Green Belt Village' that is washed-over by the Green Belt with limited local facilities and services and where scope for development is considered to be more limited if compatible with the Green Belt.
- 15.7 The proposed modification to Policy SP3 would move Lemsford into the 'Small excluded villages and settlements' category, which would be excluded (inset) from the Green Belt and where there may be a focus for limited new development where this is compatible with the scale and character of the village.
- 15.8 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in 'high' harm, or 'very high' harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 15.9 Two sites have been considered at Lemsford, StL13 and StL16. Site StL13 falls within a parcel that would lead to 'moderate' harm to the Green Belt, if developed, according to the Green Belt Study (Stage 3) with limited overall impact. Site StL16, falls within a 'high' harm parcel.
- 15.10 It is considered that if StL13 were to be allocated, the scale of development would be compatible with the scale and character of the village.
- 15.11 However, development of StL16 would expand the village of Lemsford to the west and weaken the sense of separation between Lemsford and Stanborough thus compromising the relationship between Welwyn Garden City and its rural surroundings.
- 15.12 The release of both StL13 and StL16 would involve a larger parcel of land being inset from the Green Belt at Lemsford that would extend development beyond the current limit north of Lemsford Village Lane and enclose the current openness between the village and St Johns Primary School.

- 15.13 On this basis, and following the detailed Stage 3 assessment, one of the two shortlisted sites is considered appropriate for allocation. This is shown by **Table 15.2**, which also lists those sites not considered for allocation following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.

**Table 15.2: Stage 3 Detailed Assessment at Lemsford.**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
StL13	Land at Roebuck Farm	Green Belt	Considered for allocation	27
StL16	Land adjacent Lemsford School	Green Belt	Harm to the Green Belt outweighs the benefits of the site.	0
<b>Total</b>				<b>27</b>

#### **Stage 4 - Settlement Level Assessment**

- 15.14 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

- 15.15 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

## **Key Infrastructure Issues**

- 15.16 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### ***Secondary Schools***

- 15.17 No new housing allocations were proposed in Lemsford in the Draft Local Plan 2016. In 2019, a single site with estimated capacity of 27 dwellings is proposed. This equates to less than 0.1FE. These numbers can be accommodated either at existing secondary schools in Welwyn Garden City, or at the proposed new secondary school at North-west Hatfield SDS5 (Hat1).

### ***Primary schools***

- 15.18 The additional need for places, which is of less than 0.1FE, can be accommodated at existing primary schools; the closest being St. John's C of E Primary, which is within 500m of the proposed housing site.

### ***Highways***

- 15.19 At the proposed level of development, 27 dwellings, there are no significant highway infrastructure issues associated with this allocation.

### ***Utilities***

- 15.20 At the proposed level of development, 27 dwellings, there are no significant utility infrastructure issues associated with this allocation.

## **Strategic Advantages/Disadvantages**

- 15.21 There are no strategic advantages or disadvantages associated with any of the sites considered.

## **Green Belt Matters**

- 15.22 Following the Stage 3 assessment, one site is proposed for allocation in the Local Plan at Lemsford. No sites were included in the Local Plan 2016, as submitted.



- 15.23 Consideration is needed for how the Green Belt boundary could be amended at Lemsford, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent<sup>2</sup>.
- 15.24 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 15.25 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 15.26 As discussed, the site under consideration that falls within the 'high' harm category (StL16) is not proposed for allocation. The site StL13 is proposed for allocation, this site falls within a 'moderate' harm category and is considered to lead to limited overall impact. It is considered that impact on the Green Belt is reduced to the lowest reasonably practical extent by excluding sites that would lead to most harm, and by ensuring the separation between Stanborough and Lemsford remains open, and by ensuring that master-planning and new planting creates robust and defensible boundaries to the south of the site. It is considered that the provision of a landscape belt to the south of the site would help to minimise harm to the openness of the Green Belt. It is also proposed that the developable area is reduced to take account of the close proximity of the adjacent Grade II listed building and allow views from the Old Cottage towards the river.
- 15.27 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 15.1**.

### **Proportional Distribution**

- 15.28 The proportion of households located at Lemsford is 0.2% of the borough, when considered as a whole, and based on the 2011 Census data. There were no proposed allocations in the Local Plan 2016, i.e. 0%, thus the original draft local plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.

---

<sup>2</sup> Paragraph 139(f) NPPF 2019.

- 15.29 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the original local plan, as submitted. Whilst the next most sustainable locations for development across the borough will be at the large excluded (inset) villages, it is also necessary to consider some development at the smaller settlements
- 15.30 For the reasons set out above, it is necessary to consider some growth at Lemsford, and so the proportion of growth increases. As a result of the sites proposed in this paper, the proportion goes up to 0.2% at Lemsford.
- 15.31 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

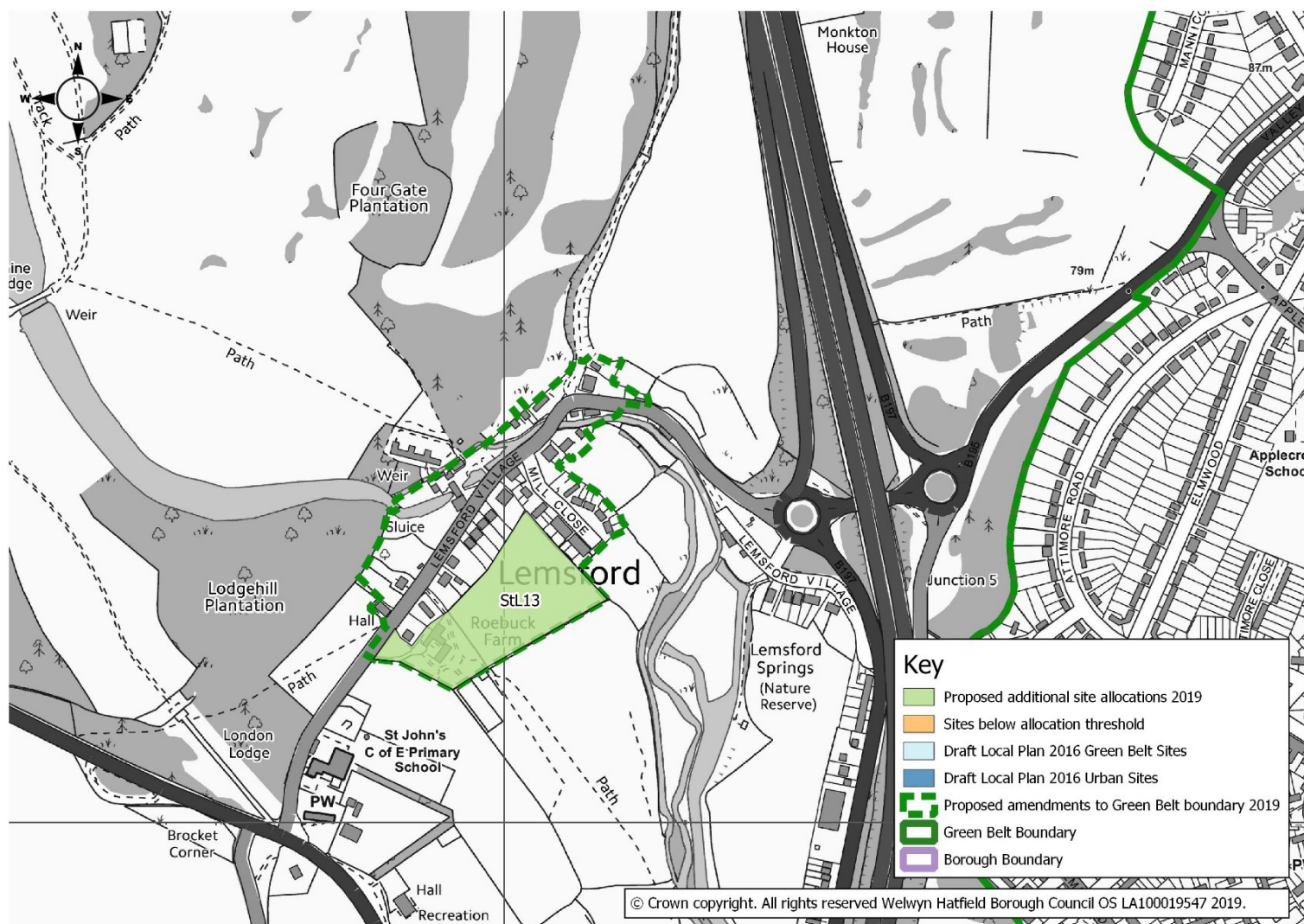
### **Conclusions**

- 15.32 The site selection process has tested four additional sites at Lemsford. This work has resulted in one site being proposed for allocation.
- 15.33 It is proposed that Lemsford is excluded (inset) from the Green Belt and **Policy SP3: Settlement Hierarchy** is updated to reflect the new category for this settlement. It is considered that the level of development proposed is compatible with the scale and character of the village. Lemsford is located close to Welwyn Garden City and is therefore accessible to a wide range of services and facilities in close proximity.
- 15.34 Overall, it is considered that impact to the Green Belt is reduced to lowest reasonable practical extent. It is therefore considered that on balance, and following the detailed assessment, that allocation of the site proposed is justified.
- 15.35 **Table 15.3** lists those sites recommended for allocation in the Local Plan at Lemsford.
- 15.36 A map of Lemsford has been prepared to illustrate the sites proposed for allocation, along with those found to be unsuitable. This can be found at **Appendix B**.

**Table 15.3: Sites proposed for allocation in the emerging Local Plan at Lemsford as updated in 2019.**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
StL13	Land at Roebuck Farm	Green Belt	Considered for allocation	27
<b>Total</b>				<b>27</b>

**Figure 15.1: Proposed change to Green Belt boundary at Lemsford to inform the emerging WHBC Local Plan as updated in 2019.**



## 16. Stanborough

### Draft Local Plan 2016: Sites Proposed for Allocation

- 16.1 There were no sites proposed for allocation in the Draft Local Plan 2016 for Stanborough.

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 16.2 The 2019 site selection process considered 5 additional sites. One of the additional sites failed the HELAA stages 1 and four additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by Table 16.1 that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 16.1: Results of Stages 1 and 2 (HELAA 2019) of the site selection process at Stanborough**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
StL1	Land to the north of New Road	Green Belt	N/A	90
StL2	North of Oldings Corner	Green Belt	Site does not lie within or adjoin a settlement identified in the LUC GB Study 3. Neither does it adjoin an excluded settlement.	0
StL3	Land at and adjacent The Holding	Green Belt	N/A	396
StL15	Land to the east of Great North Road	Green Belt	N/A	8
GTLAA10 (StL17)	Land at Great North Road	Green Belt	N/A	5 pitches
<b>Total</b>				<b>494 dwellings + 5 pitches</b>

- 16.3 There were no sites proposed at Stanborough for employment uses and this matter is not considered further.

### Site Selection 2019 Stage 3 – Detailed Assessment

- 16.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 16.1**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 16.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 16.6 Stanborough was classified within the ‘Small Green Belt Villages’ category where the community looks towards larger settlements for services and facilities.
- 16.7 A proposed modification to Policy SP3 would move Stanborough and Lemsford into the ‘Small excluded villages and settlements’ category, which would be excluded (inset) from the Green Belt and where there may be a focus for limited new development where this is compatible with the scale and character of the village.
- 16.8 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 16.9 One site proposed at Stanborough, StL3, if developed, would lead to ‘very high harm’ to the Green Belt. This is a relatively large site that would significantly extend built development into the open countryside and lead to harm to the separation between Hatfield and Stanborough. This site is not considered appropriate for allocation.
- 16.10 Three other sites have been considered at Stanborough. Two of these are relatively small sites that are also very contained, between existing built development and/ or highways, and the A1 (M). These sites (StL15 and StL17 – GTLAA10) fall within ‘low’ harm parcels in the Green Belt Study (Stage 3). Given the contained nature of these sites and the very limited impact on the Green Belt associated with their development, these sites are considered appropriate for allocation.

- 16.11 The other site considered, StL1, is located to the north of the settlement of Stanborough and has existing built development on three sides. It falls within a parcel that would lead to 'moderate' harm to the Green Belt in the Green Belt Study (Stage 3), but given its containment, the development of this site would have very little impact on the wider Green Belt. Even though Stanborough falls in a small village category, it is located close to services and facilities in Welwyn Garden City and scores relatively well in the Sustainability Appraisal. On balance, it is considered appropriate for this site to be allocated.
- 16.12 On this basis, and following the detailed Stage 3 assessment, three of the four shortlisted sites are considered appropriate for allocation. These are shown by **Table 16.2**.

**Table 16.2: Stage 3 Detailed Assessment at Stanborough**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
StL1	Land to the north of New Road	Green Belt	Considered for allocation	90
StL3	Land at and adjacent The Holding	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
StL15	Land to the east of Great North Road	Green Belt	Considered for allocation	8
StL17	Land at Great North Road	Green Belt	Considered for allocation	5
<b>Total</b>				<b>98 dwellings + 5 pitches</b>

## **Stage 4 - Settlement Level Assessment**

16.13 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

16.14 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

16.15 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### ***Secondary Schools***

16.16 No new housing allocations were proposed in Stanborough in the Draft Local Plan 2016. In 2019, sites with a total capacity of 103 homes are proposed. This equates to 0.2FE. These numbers can be accommodated either at existing secondary schools in Welwyn Garden City, or at the proposed new secondary school at North-west Hatfield SDS5 (Hat1).

16.17 HCC notes in particular that 1FE of further capacity at Stanborough School would become available to meet the needs of Welwyn Garden City, and potentially Stanborough, once the proposed new 8-10FE secondary school at North-west Hatfield (Hat1) becomes available.



### ***Primary schools***

- 16.18 The additional 0.2FE demand for primary school places, arising from developments at Stanborough, would be accommodated in existing primary schools in Welwyn Garden City or Lemsford, or potentially in the new primary provision proposed at North-west Hatfield SDS5 (Hat1). The latter provision is likely to be within 1km of the Stanborough housing sites.

### ***Highways***

- 16.19 The additional housing development at Stanborough will not contribute substantially to overall levels of traffic on the highway network, however there will be local impacts particularly on the B653/A6129 Stanborough roundabouts either side of the A1 (M) and adjoining roads. Specific capacity improvements are proposed for these roundabouts, and are listed in the Infrastructure Delivery Schedule at Appendix 1 of the Infrastructure Delivery Plan (IDP).

### ***Utilities***

- 16.20 There are no specific utility infrastructure issues associated with these proposed housing allocations.

### **Strategic Advantages/Disadvantages**

- 16.21 There are no strategic advantages or disadvantages associated with any of the sites proposed although the site StL1 offers potential to include a small shop. This may offer a local benefit, but is not in itself significant enough to affect the conclusion for whether the site is considered appropriate, or not, for allocation.

### **Green Belt Matters**

- 16.22 Following the Stage 3 assessment, five sites are proposed for allocation in the Local Plan at Stanborough. No sites were included in the Local Plan 2016, as submitted, and so all three sites which are additional.
- 16.23 Consideration is needed for how the Green Belt boundary could be amended at Stanborough, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent<sup>3</sup>.

---

<sup>3</sup> Paragraph 139(f) NPPF 2019.

- 16.24 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 16.25 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 16.26 The sites proposed for allocation fall into 'moderate' or 'low' harm parcels and are considered to have limited impacts on the Green Belt. The sites, StL15 and 17 are contained by existing development and the A1 (M) and the site, StL1, is enclosed by existing development on three sides. It is important that the impact of development at StL1 is minimised to the lowest reasonably practical extent by ensuring that master-planning and new planting, by strengthening the existing hedgerows, creates a robust and defensible boundary to the north of the site.
- 16.27 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 16.1**.

### **Proportional Distribution**

- 16.28 The proportion of households located at Stanborough is 0.3% based on the 2011 Census data. There were no proposed allocations in the Local Plan 2016, i.e. 0%, thus the original draft local plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.
- 16.29 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the original local plan, as submitted. Whilst the next most sustainable locations for development across the borough will be at the large excluded (inset) villages, it is also necessary to consider some development at the smaller settlements
- 16.30 For the reasons set out above, it is necessary to consider some growth at Stanborough, and so the proportion of growth increases. As a result of the sites proposed in this paper, the proportion goes up to 0.9% at Stanborough.

- 16.31 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

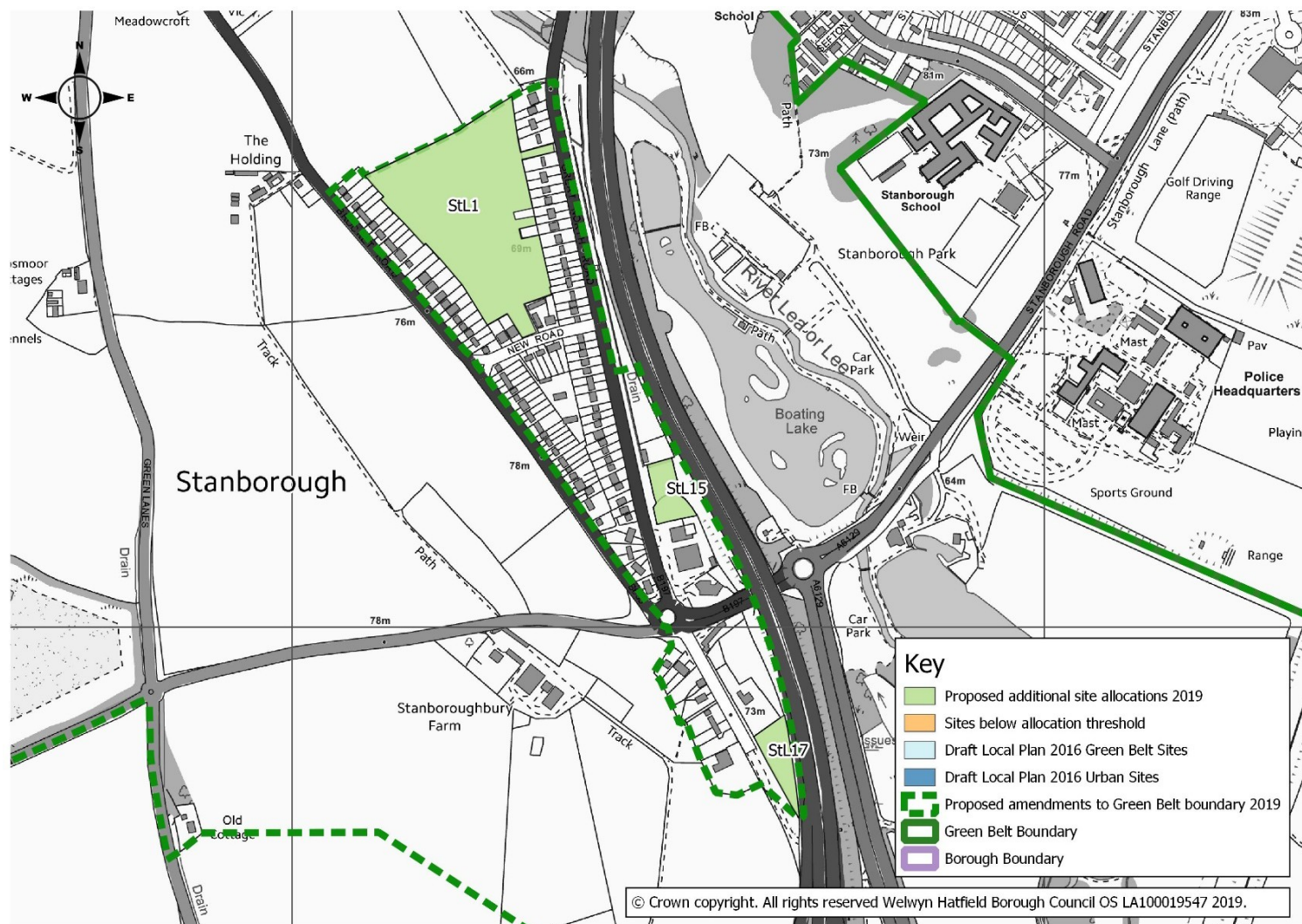
## Conclusions

- 16.32 The site selection process has tested five additional sites at Stanborough. This work has resulted in three additional sites being proposed for allocation at Stanborough.
- 16.33 It is proposed that Stanborough is excluded (inset) from the Green Belt and **Policy SP3: Settlement Hierarchy** is updated to reflect the new category for this settlements. It is considered that the level of development proposed is compatible with the scale and character of the villages. Stanborough is located within walking/cycling distance of a number of services, and accessible to facilities in the south-west of Welwyn Garden City. Whilst Stanborough has no facilities within its boundary it is still considered that development in this will accord to the spatial vision of delivering a sustainable pattern of development.
- 16.34 **Table 16.3** lists those sites recommended for allocation in the Local Plan at Stanborough and Lemsford.
- 16.35 A map of Stanborough has been prepared to illustrate the sites proposed for allocation, along with those found to be unsuitable. This can be found at **Appendix B**

**Table 16.3: Sites proposed for allocation in the emerging Local Plan at Stanborough as updated in 2019**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
StL1	Land to the north of New Road	Green Belt	Considered for allocation	90
StL15	Land to the east of Great North Road	Green Belt	Considered for allocation	8
StL17	Land at Great North Road	Green Belt	Considered for allocation	5 pitches
<b>Total</b>				<b>98 dwellings + 5 pitches</b>

**Figure 16.1: Proposed change to Green Belt boundary at Stanborough to inform the emerging WHBC Local Plan as updated in 2019**



## 17. Welham Green

### Draft Local Plan 2016: Sites Proposed for Allocation

- 17.1 There were two sites proposed for allocation in the Draft Local Plan 2016 for this settlement. These are listed in **Table 17.1** that also identifies whether the sites are located within an urban or Green Belt location.

**Table 17.1: Sites proposed for allocation in the Draft Local Plan 2016 at Welham Green**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS35	GTLAA01	Foxes Lane, Dixons Hill Road	Green Belt	12 pitches
SDS7	WeG4b	Marshmoor	Green Belt	Approximately 40,500sqm of Class B1 employment floorspace; and around 80 dwellings
<b>Total</b>				<b>80 dwellings + 12 pitches</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 17.2 The 2019 site selection process considered 11 additional sites, or site options, along with the original Draft Local Plan sites listed in **Table 17.1**. Two of the additional sites failed the HELAA stages (Stages 1 and 2) and one site was withdrawn; eight additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 17.2** that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 17.2: Results of Stages 1 and 2 of the Site Selection process (HELAA 2019) at Welham Green**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
WeG1	Units 1-3, 51 Welham Manor	Green Belt	N/A	16
WeG3	Land at Welham Manor	Green Belt	N/A	45*
WeG3a	Land at Welham Manor and west of Station Road	Green Belt	N/A	68*
WeG6	Skimpans Farm	Green Belt	N/A	73
WeG10	Land at Dixons Hill Road	Green Belt	N/A	120
WeG11	Land at Marshmoor Lane	Green Belt	Highways issues, noise and surface water flooding.	0
WeG12	Land north of Pooleys Lane	Green Belt	N/A	83
WeG15	Land at Potterells Farm	Green Belt	N/A	140
WeG17	Land south of Dixons Hill Road	Green Belt	N/A	1 or 2fe Primary School
WeG19	Cravenia	Green Belt	Site withdrawn	0
WeG20	St Mary's Primary School, 91 Dellsome Lane	Green Belt	Site not available	0
<b>Total</b>				<b>500</b>

\*Where scenarios apply, only one capacity figure is included (in this case, the highest), in the total to avoid double counting.

- 17.3 One site is proposed at Welham Green for mixed-use development (WeG4b) that includes over 40,500sqm additional employment space, which was proposed for allocation in the original Draft Local Plan, as submitted (**Table 17.1**).

### **Site Selection 2019: Stage 3 – Detailed Assessment**

- 17.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 17.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.

- 17.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 17.6 Welham Green is considered to be a sustainable settlement, being a large village excluded (inset) from the Green Belt and offering a range of services and facilities, employment and good public transport connectivity, including a railway station. This settlement falls into the third tier of settlements in **Policy SP3: Settlement Hierarchy** demonstrating its relative sustainability merits following the two main towns at Welwyn Garden City and Hatfield.
- 17.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in 'high' harm, or 'very high' harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 17.8 At Welham Green, there is only one additional site being considered that falls into a 'high' harm parcel in Green Belt terms, which is site WeG17 that is being proposed for a new primary school. Even though it is stated above that additional 'high' harm sites would generally not be considered appropriate for development, consideration is also needed on a site-by-site basis.
- 17.9 In the case of WeG17, this site is being proposed for a new primary school, which would include areas of open space, games courts, playing pitches and habitat areas, with the school buildings being located towards the frontage with Dixons Hill Road. Therefore, a new primary school would have less impact than a site being proposed for residential development. It is also the case that the adjoining parcels of land have lower harm ratings, WeG10, which is located opposite WeG17, falls within a 'moderate' harm parcel and WeG15 falls within a 'Moderate – high' rated parcel as identified by the Green Belt Study (Stage 3). Furthermore, site WeG17 falls within a larger parcel considered in the Green Belt Study (Stage 3) and is rated as having 'high' harm for the whole parcel.
- 17.10 For these reasons, it is considered that releasing WeG17, which would not extend the edge of Welham Green any further west than WeG10, and especially as the development of the site for a primary school would lead to less impact than for residential development and because much of the site will remain open, that on balance, it is considered suitable for allocation as a primary school.

- 17.11 The majority of the remaining sites being considered at Welham Green lead to 'low', 'moderate – low' or 'moderate' harm to the Green Belt as identified in the Green Belt Study (Stage 3). This applies to SDS7 (WeG4b), WeG6, WeG10, WeG12 and HS35 (GTLAA01). The majority of these sites are reasonably contained and development of these sites would lead to robust and defensible Green Belt boundaries. WeG10 is more open, but it is considered that its release for development would still have relatively limited impact on the integrity of the wider Green Belt.
- 17.12 The two sites proposed in the Local Plan 2016 SDS7 (WeG4b) and HS35 (GTLAA01) would lead to 'moderate – low' harm to the Green Belt. They are largely enclosed sites that would lead to little impact on the integrity of the wider Green Belt. Site WeG4b consists partly of previously developed land and is completely enclosed by the A1000. These sites continue to be considered appropriate for allocation.
- 17.13 Related to the lower levels of harm associated with the promoted development sites around Welham Green is the fact that releasing these sites for development also has relatively little impact on separation between settlements, partly due to the geographic location of Welham Green in the borough, and the enclosed nature of some of the sites. For example, WeG6 is enclosed by the railway line to the east, existing residential development to the north and west and woodland to the south. The sites to the east of the railway, especially WeG4b, is contained by the A1000.
- 17.14 The sites WeG1, WeG3 or WeG3a and WeG15 are adjoining. Whilst they have been assessed individually, consideration should also be given for the opportunities of master-planning these sites in a comprehensive way. In Green Belt terms, release of WeG1 would lead to 'low' harm to the Green Belt and for WeG3 or WeG3a the impact would be 'moderate'. The impact of releasing WeG15 is considered to be 'moderate – high'. However, if WeG15 is released, then clearly WeG1, and WeG3 or WeG3a would be entirely enclosed and the impact of releasing those from a Green Belt perspective would be negligible.
- 17.15 Further, should WeG3a be allocated (over WeG3), the primary vehicular access could be taken from Station Road, rather than from Welham Manor, where the restricted nature of the highway limits the potential dwelling capacity for site WeG3. In the case of site WeG3a, access from Welham Manor could be limited to pedestrian/cyclist access and emergency services vehicular access only. The allocation of WeG3a would also facilitate a small uplift in capacity for WeG1, from 10 in the 2016 HELAA to 16 dwellings in 2019.



17.16 WeG15 is a more open site and its development would lead to encroachment of the countryside, even though there would be opportunities to create robust and defensible boundaries through effective master-planning and new planting. On balance, it is considered that the opportunities for supporting the delivery of a sustainable urban extension at a sustainable location, consistent with the Settlement Hierarchy, outweighs the potential harm to the Green Belt, especially as the harm falls below the 'high' rating, that robust boundaries can be created and that the impact on separation between settlements is relatively low.

17.17 On this basis, and following the detailed Stage 3 assessment, all of the shortlisted sites, both Local Plan 2016 and the additional sites, are considered appropriate for allocation. These are shown by **Table 17.3**.

**Table 17.3: Result of the Stage 3 detailed assessment at Welham Green**

Draft Local Plan (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
HS35	GTLAA01	Foxes Lane, Dixons Hill Road	Green Belt	Local Plan 2016 Site	12 pitches
N/A	WeG1	Units 1-3, 51 Welham Manor	Green Belt	N/A	16
N/A	WeG3	Land at Welham Manor	Green Belt	A smaller scenario to WeG3a	0
N/A	WeG3a	Land at Welham Manor and west of Station Road	Green Belt	N/A	68
SDS7	WeG4b	Marshmoor	Green Belt	Local Plan 2016 Site	Approximately 40,500sqm of Class B1 employment floorspace; and around 80 dwellings
N/A	WeG6	Skimpans Farm	Green Belt	N/A	73
N/A	WeG10	Land at Dixons Hill Road	Green Belt	N/A	120
N/A	WeG12	Land north of Pooleys Lane	Green Belt	N/A	83
N/A	WeG15	Land at Potterells Farm	Green Belt	N/A	140
N/A	WeG17	Land south of Dixons Hill Road	Green Belt	N/A	1 – 2FE Primary School
<b>Total</b>					<b>592</b>

## **Stage 4 - Settlement Level Assessment**

17.18 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

17.19 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

17.20 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### ***Secondary Schools***

17.21 The secondary school strategy employed by Hertfordshire County Council (HCC) is to consider the total growth in demand for places arising from developments to the south of Hatfield, including Welham Green, Brookmans Park, Little Heath and Cuffley. Existing secondary schools serving this area include Chancellors at Brookmans Park as well as schools in Potters Bar and Broxbourne Borough.

- 17.22 The demand for secondary school places arising from the housing growth across the Borough in the Draft Local Plan 2016 could be satisfactorily accommodated through providing two new secondary schools and limited expansion at certain existing secondary schools. The new school sites were at Birchall Garden Suburb in East Herts (EWEL1) and at North-west Hatfield (SDS5 (Hat1)). These schools were sized at 6-8FE and 8-10FE respectively.
- 17.23 In 2019, with additional housing sites being added, HCC has assessed that to accommodate the additional demand arising from the southern villages (about 3.7FE in total) together with additional growth in the Welwyn Garden City and Hatfield areas, a third new secondary school at 6-8FE will be required, preferably in the south Hatfield area. The preferred location for this school is at the HCC-owned site of New Barnfield, Travellers Lane, Hatfield.
- 17.24 A Statement of Common Ground exists between the Council and HCC, in which HCC commits to making the New Barnfield site available for a new secondary school subject to certain caveats. The site is currently allocated as a waste site in HCC's adopted Waste Site Allocations Plan from 2014, however this allocation is no longer required, subject to the Council working with HCC to identify a new site for a Household Waste Recycling Centre. This work is well underway, with a planning application submitted for a site at Tewin Road in Welwyn Garden City.
- 17.25 As regards Chancellors School, HCC advises that 1FE of capacity has been prioritised for Hatfield pupils from 2019. The provision of the new school at south Hatfield would release capacity at Chancellors for pupils living further south in the Borough, including Welham Green.

### ***Primary schools***

- 17.26 In 2019, 500 homes are proposed on various sites at Welham Green, in addition to the 92 which were included in the Draft Local Plan 2016, giving a total additional demand of about 1.2FE. The existing primary school, St Mary's in Dellsome Lane, will not have capacity to accommodate this additional demand. Accordingly it is proposed that a new 2FE primary school is provided at Welham Green on site WeG17, in Dixons Hill Road, adjoining Welham Manor, to provide sufficient long-term capacity at the settlement for existing and planned growth.

- 17.27 HCC has considered the additional demand at Welham Green alongside that for Brookmans Park, as there is an interrelationship between the two settlements. The provision of excess capacity at the new primary school site in Welham Green would allow those pupil numbers from that village currently being accommodated in Brookmans Park Primary School to be accommodated in Welham Green. This would free up some capacity at Brookmans Park School to accommodate additional children associated with the housing growth in Brookmans Park.

### ***Highways***

- 17.28 Transport modelling work has been undertaken using Hertfordshire County Council's COMET model to assess increases in congestion and waiting times at key junctions on the network, which are likely to arise as a result of development of the selected Local Plan sites.
- 17.29 Whilst it is expected that congestion levels and waiting times at key junctions will increase as a result of the cumulative impact of proposed developments in Welham Green, HCC as Highway Authority has not identified any severe impacts. Earlier indicative work by HCC has however identified a need for a highway capacity improvement at the Dixons Hill Road/A1000 roundabout, particularly given that the proposed mixed-use development at Marshmoor SDS7 (WeG4b) will take access to that roundabout.

### ***Utilities***

- 17.30 In terms of sewerage infrastructure, new development at Welham Green will drain to the Blackbirds and Maple Lodge sewage treatment works in the south-west of the county. During the Plan period, substantial additional development in neighbouring districts, as well as development in Welwyn Hatfield, will drain to these works. Thames Water has raised no issues with either infrastructure capacity or lead-in times in relation to the development of these sites, as any improvements to the network or the sewage treatment works will be programmed in, in accordance with the pace of development.

### **Strategic Advantages/Disadvantages**

- 17.31 In addition to the proposed delivery of a primary school on the WeG17 site, there are also strategic advantages associated with the sites WeG1, WeG3a and WeG15. The combination of these sites facilitates the opportunity for a more comprehensive approach to master-planning a larger and more coherent development that can form a sustainable urban extension to the settlement of Welham Green. Bringing forward site WeG3a (rather than the

smaller WeG3 site) also facilitates a primary vehicular access route to development from Station Road, thus limiting access from Welham Manor to emergency vehicles, and pedestrian/cyclist access. Whilst access from Welham Manor was found acceptable in 2016, dwelling capacity was constrained due to the design of the highway and prevalence of on-street parking.

- 17.32 WeG4b has been proposed for allocation for mixed-use development, including a significant level of employment provision of approximately 40,500sqm (B class uses) and around 80 dwellings. Welham Green already benefits from a successful employment area and site WeG4b provides an opportunity for further employment provision north-east of the railway line. This would clearly be advantageous as the site would make a significant contribution to the borough's employment requirements in a sustainable and accessible location, but also provide more employment at a local scale, thus helping to improve the sustainability of the proposed development at Welham Green.

### **Green Belt Matters**

- 17.33 Following the Stage 3 assessment, ten sites are proposed for allocation in the Local Plan at Welham Green. Two of these sites were included in the Local Plan 2016, as submitted, and eight are additional.
- 17.34 Consideration is needed for how the Green Belt boundary could be amended to Welham Green as a whole, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent<sup>4</sup>.
- 17.35 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 17.36 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 17.37 As discussed, only one site that falls within the 'high' harm category (WeG17) is proposed for allocation, but providing this is allocated for a primary school to meet a need for additional infrastructure associated with housing growth,

---

<sup>4</sup> MHCLG (2019). National Planning Policy Framework - Paragraph 139(f).

and where much of the site will remain open and where development does not extend further west than the adjoining WeG10 site.

- 17.38 The majority of the remaining sites are enclosed, and lead to relatively limited impact on the Green Belt where the proposed boundaries would be of equivalent strength to the existing. Site WeG15 is more open, but opportunities exist to create robust and defensible boundaries through effective master-planning and new planting. Release of the proposed Welham Green sites do not adversely affect settlement separation.
- 17.39 Given the relatively limited impacts overall from releasing the proposed sites, the opportunities for minimising impacts on the Green Belt to the lowest reasonable practical extent are achieved through the site-by-site assessments and careful consideration for whether the sites should be allocated and how the Green Belt boundaries should be devised. The key opportunity for minimising impact is to restrict the use of site WeG17 for a primary school and ensuring that the majority of the site remains open, and that any school buildings are located close to the frontage with Dixon's Hill Road, and close to existing and adjoining residential development in Welham Manor.
- 17.40 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 17.1**.

### **Proportional Distribution**

- 17.41 The proportion of households located at Welham Green is 2.9% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 1.1%, thus the original Draft Local Plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.
- 17.42 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the Draft Local Plan, as submitted, and because the next most sustainable locations for development will be at the large excluded (inset) villages, such as Welham Green.
- 17.43 For the reasons set out above, it is inevitable that the proportion of growth at Welham Green is increased by proposing additional development sites at this

settlement. As a result of the sites proposed in this paper, the proportion goes up to 5.0%.

- 17.44 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## **Conclusions**

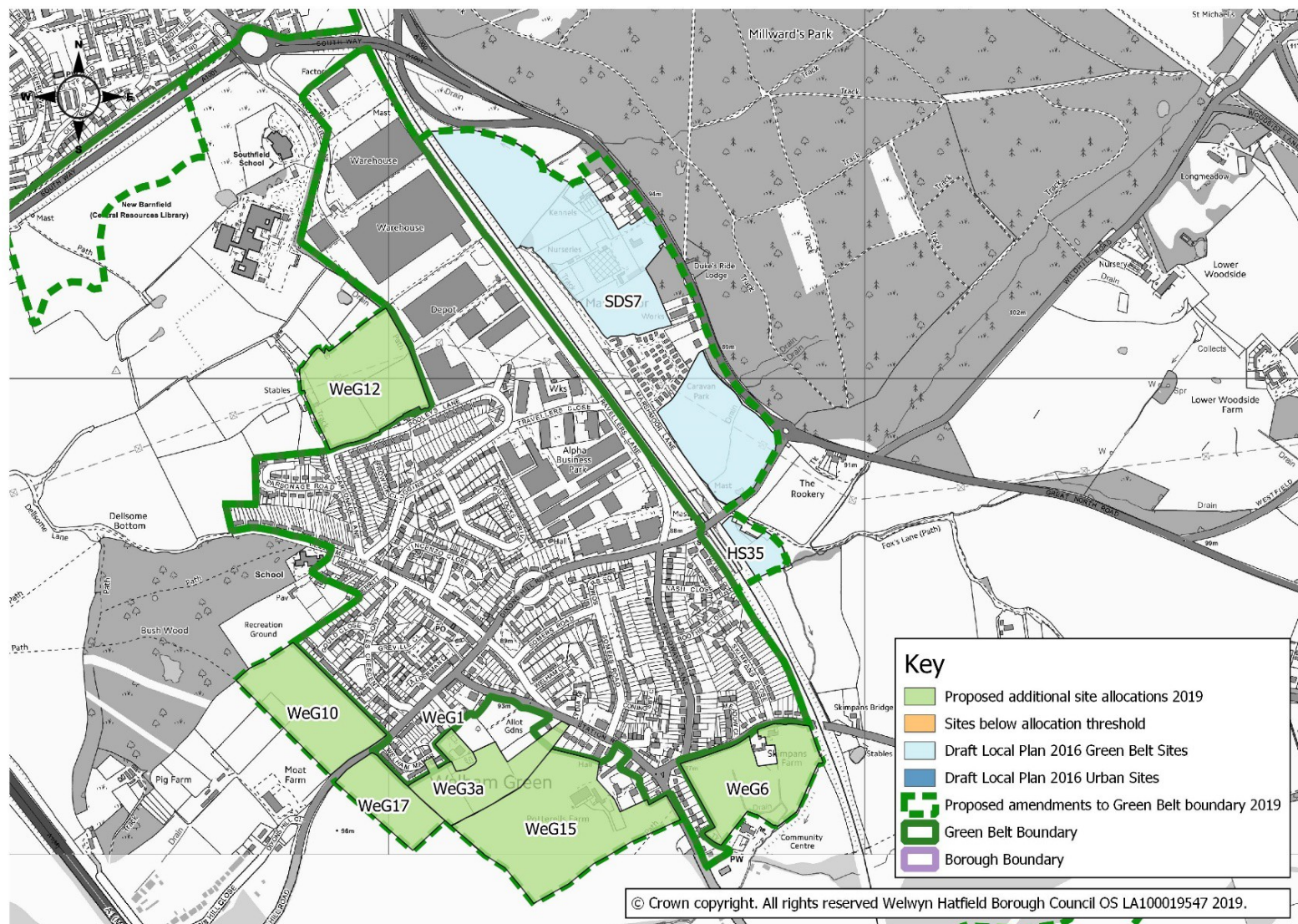
- 17.45 The site selection process has tested 11 additional sites, in addition to re-appraising those sites proposed in the Local Plan 2016. This work has resulted in nine additional sites being proposed for allocation at Welham Green, including one being allocated for a new primary school, and in addition to the two sites already proposed in the Local Plan 2016. The two existing Local Plan sites, include HS35 (GTLAA01) that is proposed for 12 (additional) Gypsy and Traveller pitches and SDS7 (WeG4b) that is proposed for mixed-use development, including approximately 40,500sqm of employment (B class uses).
- 17.46 Welham Green is one of the larger villages excluded (inset) from the Green Belt and thus forms one of the next most sustainable locations for development in the borough following the two towns at Welwyn Garden City and Hatfield. Consideration has been given to minimising harm to the Green Belt, to ensuring the proposed change to Green Belt boundaries are robust and defensible and that the level of development is sustainable.
- 17.47 Only one site is proposed that would lead to 'high' harm to the Green Belt, but this is proposed to be allocated for a primary school where the majority of the site will remain open. It is therefore considered that on balance, and following the detailed assessment, that allocation of this site is justified.
- 17.48 **Table 17.4** lists those sites recommended for allocation in the Local Plan at Welham Green.
- 17.49 A map of Welham Green has been prepared to illustrate the sites proposed for allocation, along with those found to be unsuitable. This can be found at **Appendix B**.

**Table 17.4: Sites proposed for allocation in the emerging Local Plan at Welham Green as updated in 2019**

<b>Draft Local Plan (Site Ref)</b>	<b>HELAA 2019 (Site Ref)</b>	<b>Site Name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
HS35	GTLAA01	Foxes Lane, Dixons Hill Road	Green Belt	Local Plan 2016 Site	12 pitches
N/A	WeG1	Units 1-3, 51 Welham Manor	Green Belt	Considered for allocation	16
N/A	WeG3a	Land at Welham Manor and west of Station Road	Green Belt	Considered for allocation	68
SDS7	WeG4b	Marshmoor	Green Belt	Local Plan 2016 Site	Approximately 40,500sqm of Class B1 employment floorspace; and around 80 dwellings
N/A	WeG6	Skimpans Farm	Green Belt	Considered for allocation	73
N/A	WeG10	Land at Dixons Hill Road	Green Belt	Considered for allocation	120
N/A	WeG12	Land north of Pooleys Lane	Green Belt	Considered for allocation	83
N/A	WeG15	Land at Potterells Farm	Green Belt	Considered for allocation	140
N/A	WeG17	Land south of Dixons Hill Road	Green Belt	Considered for allocation	1 – 2FE Primary School
<b>Total</b>					<b>580 + 12 pitches and 40,500sqm Class B1 Floorspace</b>



**Figure 17.1: Proposed change to Green Belt boundary at Welham Green to inform the emerging WHBC Local Plan as updated in 2019**



## 18. Bell Bar and Brookmans Park

### Draft Local Plan 2016: Sites Proposed for Allocation

- 18.1 There were three sites proposed for allocation in the Draft Local Plan 2016 for Brookmans Park. Bell Bar and Brookmans Park are considered together in this paper as the potential changes to the Green Belt benefit from being considered comprehensively. These are listed in **Table 18.1** that also identifies whether the sites are located within an urban or Green Belt location.

**Table 18.1: Sites proposed for allocation in the Draft Local Plan 2016 at Bell Bar and Brookmans Park**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Capacity (DLP 2016)
HS21	BrP13	Land west of Golf Club Road	Green Belt	14
HS22	BrP4	Land west of Brookmans Park Railway Station	Green Belt	250
HS23	BrP14	Land east of Golf Club Road	Green Belt	10
<b>Total</b>				<b>274</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 18.2 The 2019 site selection process considered 17 additional sites along with the original Local Plan sites listed in **Table 18.1**. All of the sites passed Stage 1. Seven of the additional sites failed the HELAA stage 2 and ten additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 18.2** that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 18.2: Results of Stages 1 and 2 of the Site Selection process (HELAA 2019) at Bell Bar and Brookmans Park**

HELAA 2019 (site ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Numbers of Dwellings
BrP1	Upper Bell Lane Farm	Green Belt	N/A	104
BrP5	Land west of Brookmans Park	Green Belt	N/A	165
BrP6	Land west of Bluebridge Road	Green Belt	N/A	210
BrP9	Friday Grove	Green Belt	Impact on heritage assets	0
BrP9a	Friday Grove	Green Belt	Impact on heritage assets and lack of suitable access	0
BrP10	Raybrook Farm	Green Belt	Impact on heritage assets	0
BrP12	Land north of Peplins Way	Green Belt	N/A	125*
BrP12a	Land north of Peplins Way	Green Belt	N/A	125*
BrP14a	Land east of Golf Club Road	Green Belt	N/A	0**
BrP26	Meadowcroft, Great North Road	Green Belt	N/A	4
BrP31a	68 Georges Wood Road and land to the rear of 70 Georges Wood Road	Green Belt	Lack of suitable access	0
BrP32	Land west of Queenswood School	Green Belt	Impact on heritage assets	0
BrP33	Firs Stables, Woodside Lane	Green Belt	Lack of suitable access	0
BrP34	Brookmans Park Transmitting Station	Green Belt	N/A	300 dwellings and a net gain of circa. 10,623sqm of B1a
BrP35	Bell Bar Pet Farm and adjoining car workshop	Green Belt	N/A	2
BrP36	Brookmans Park Golf Club	Green Belt	N/A	24
BrP37	Brookmans Park reservoir and water tower, Kentish Lane	Green Belt	Lack of suitable access	0
<b>Total</b>				<b>934</b>

\* Where scenarios apply, only one capacity figure is included in the total to avoid double counting

\*\* The development potential of BrP14a is subsumed within site HS23 (BrP14) which is already proposed for allocation in the Draft Local Plan 2016.

- 18.3 One site has been promoted at Bell Bar and Brookmans Park for mixed-use (residential and employment) development (BrP34) that has an assessed potential capacity for around 10,623sqm additional employment space (**Table 18.2**).

### **Site Selection 2019: Stage 3 – Detailed Assessment**

- 18.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 18.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 18.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 18.6 Brookmans Park is considered to be a sustainable settlement, being a large village excluded (inset) from the Green Belt and offering a range of services and facilities, employment and good public transport connectivity including a railway station. This settlement falls into the third tier of settlements in **Policy SP3: Settlement Hierarchy** demonstrating its relative sustainability merits following the two main towns as Welwyn Garden City and Hatfield.
- 18.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study are not considered for allocation in the emerging Local Plan.
- 18.8 For these reasons sites BrP5 and BrP6 are ruled out at Stage 3 as not being appropriate for allocation. Site BrP5 would result in ‘very high’ harm to the Green Belt if it were released for development and would lead to encroachment of the separation between Brookmans Park and Welham Green. Similarly, the release of BrP6 for development would negatively impact the separation between Brookmans Park and Potters Bar to the south and would lead to ‘high’ harm to the Green Belt.
- 18.9 The Local Plan 2016 site, HS22 (BrP4) also leads to ‘high’ harm if it is released for development, however releasing this site has significantly less impact on the separation between settlements, either to Welham Green to the

north or Potters Bar to the south. This site, HS22 (BrP4) is also bounded to the west by Brick Kiln Wood, which helps to minimise Green Belt impact. Retaining open land to the north of Bradmore Lane helps to minimise any associated impact still further. It is proposed that the capacity of this site is increased from 250 to 300 dwellings, thus helping to reduce the need for any more Green Belt release and consequential impact at this settlement. This site may have the potential to deliver a higher number of dwellings in the longer term, subject to further enhancements to the local highway being delivered and providing the rural character of Bradmore Lane is maintained.

- 18.10 The other Local Plan 2016 sites, HS21 (BrP13) and HS22 (BrP14) are considered to have minimal impact on the Green Belt and should continue to be put forward for allocation. The additional sites, BrP1 and BrP34 are also considered to have less impact on the Green Belt. BrP1 is entirely enclosed by existing development and would lead to 'moderate' harm. Site BrP34, which partly consists of previously developed land is also well screened with strong boundaries and would have a limited impact on the wider Green Belt.
- 18.11 Site BrP36 is considered to be inappropriate for allocation, its release from the Green Belt would lead to a much larger parcel of land needing to be released from the Green Belt, effectively merging Brookmans Park and Bell Bar. If BrP36 is not released for development, there is an opportunity for Home Farm and the existing tree belt to the south of Bell Bar to be retained within the Green Belt thus protecting a degree of separation between these settlements.
- 18.12 The release of BrP1 is not thought to increase the merging of Bell Bar and Brookmans Park settlements given the existing enclosed nature of BrP1. If Home Farm (as indicated above) remains in the Green Belt this also helps to maintain the separation between these settlements.
- 18.13 Site BrP12 has been considered as two potential development options, (BrP12 and BrP12a); BrP12a consisting of a smaller development area that more closely aligns with the existing north western edge of Brookmans Park. This smaller area (BrP12a) is considered suitable for allocation. The smaller area helps to reduce the scale of any impact on the Green Belt and ensures a more logical Green Belt boundary can be created and has the potential to deliver the same dwelling capacity as the larger BrP12 site (at a slightly higher although still moderate density). The north-eastern corner of this site is rounded off to ensure the proposed Green Belt boundary is coherent and reflective of the northern edge of the settlement.
- 18.14 Two sites, BrP26 and BrP35, are considered suitable for development, but are too small to be allocated (below the 5 dwelling threshold for smaller settlements). The site BrP35 could potentially come forward through the

Development Management process where in accordance with relevant Local Plan policies as the proposed changes to the Green Belt boundary would lead this site to be removed from the Green Belt.

- 18.15 On this basis, and following the detailed Stage 3 assessment, there are three additional sites considered appropriate for allocation in addition to the three sites identified in the Local Plan 2016. These are shown by **Table 18.3**, which also lists those sites not considered suitable for allocation following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.

**Table 18.3: Result of the Stage 3 Detailed Assessment at Bell Bar and Brookmans Park**

<b>Draft Local Plan ref</b>	<b>HELAA 2019 (Site Ref)</b>	<b>Site Name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
HS21	BrP13	Land west of Golf Club Road	Green Belt	Local Plan 2016 site	14
HS22	BrP4	Land west of Brookmans Park Railway Station	Green Belt	Local Plan 2016 site. Dwelling numbers increased by 50 to 300	300
HS23	BrP14	Land east of Golf Club Road	Green Belt	Local Plan 2016 site	10
N/A	BrP1	Upper Bell Lane Farm	Green Belt	Considered for allocation	104
N/A	BrP12a	Land north of Peplins Way	Green Belt	Considered for allocation	125
N/A	BrP14a	Land east of Golf Club Road	Green Belt	BrP14a requires access via BrP14 - already considered for allocation	0
N/A	BrP26	Meadowcroft, Great North Road	Green Belt	Suitable for 4 dwellings. Too small to allocate	0
N/A	BrP34	Brookmans Park Transmitting Station	Green Belt	Considered for allocation	300 + 10,000sqm employment
N/A	BrP35	Bell Bar Pet Farm and adjoining car workshop	Green Belt	Suitable for 2 dwellings. Too small to allocate	0
N/A	BrP36	Brookmans Park Golf Club	Green Belt	Impact on the separation of settlements	0
<b>Total</b>					<b>853</b>

#### **Stage 4 - Settlement Level Assessment**

18.16 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/Disadvantages, and

- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

18.17 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

18.18 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### **Secondary Schools**

18.19 The secondary school strategy employed by Hertfordshire County Council (HCC) is to consider the total growth in demand for places arising from developments to the south of Hatfield, including Welham Green, Brookmans Park, Little Heath and Cuffley. Existing secondary schools serving this area include Chancellors at Brookmans Park as well as schools in Potters Bar and Broxbourne Borough.

18.20 The demand for secondary school places arising from the housing growth across the Borough in the Draft Local Plan 2016 could be satisfactorily accommodated through providing two new secondary schools and limited expansion at certain existing secondary schools. The new school sites were at Birchall Garden Suburb in East Herts (EWEL1) and at North-West Hatfield (SDS5 (Hat1)). These schools were sized at 6-8FE and 8-10FE respectively.

18.21 In 2019, with additional housing sites being added, HCC has assessed that to accommodate the additional demand arising from the southern villages (about 3.7FE in total) together with additional growth in the Welwyn Garden City and Hatfield areas, a third new secondary school at 6-8FE will be required, preferably in the south Hatfield area. The preferred location for this school is at the HCC-owned site of New Barnfield, Travellers Lane, Hatfield.

18.22 A Statement of Common Ground exists between the Council and HCC, in which HCC commits to making the New Barnfield site available for a new secondary school subject to certain caveats. The site is currently allocated as



a waste site in HCC's adopted Waste Site Allocations Plan from 2014, however this allocation is no longer required, subject to the Council working with HCC to identify a new site for a Household Waste Recycling Centre. This work is well underway, with a planning application submitted for a site at Tewin Road in Welwyn Garden City.

- 18.23 As regards Chancellors School, HCC advises that 1FE of capacity has been prioritised for Hatfield pupils from 2019. The provision of the new school at south Hatfield would release capacity at Chancellors for pupils living further south in the Borough, including Brookmans Park.

### ***Primary schools***

- 18.24 In 2019, the additional number of dwellings proposed at Brookmans Park is 579, in addition to the 274 proposed in the Draft Local Plan 2016. This total of 853 dwellings is equivalent to 1.7FE of primary demand. A proposed expansion of the existing Brookmans Park Primary School from 1.5FE to 2FE would leave an outstanding demand of 1.2FE. About 0.8FE of this demand would be accommodated using the excess capacity of the proposed new primary school at Welham Green. This leaves about 0.4FE of demand, which HCC advises could be met within existing school capacity through 'pushback' of pupil numbers to other settlements.
- 18.25 HCC has considered the additional demand at Welham Green alongside that for Brookmans Park, as there is an interrelationship between the two settlements. The provision of excess capacity at the new primary school site in Welham Green would allow those pupil numbers from that village currently being accommodated in Brookmans Park Primary School to be accommodated in Welham Green. This would free up some capacity at Brookmans Park School to accommodate additional children associated with the housing growth in Brookmans Park.

### ***Highways***

- 18.26 Transport modelling work has been undertaken using Hertfordshire County Council's COMET model to assess increases in congestion and waiting times at key junctions on the network, which are likely to arise as a result of development of the selected local plan sites.
- 18.27 Earlier work in 2016 by HCC as Highway Authority identified two junctions with the A1000, at Georges Wood Road and Swanley Bar Lane, as being locations where increased congestion and queuing were likely as a result of development of the proposed housing sites. Small scale capacity and flow improvements, such as provision of right-turn lanes where none exist at

present, were recommended to help address these problems.

- 18.28 New or revised priority junction arrangements would also be required to serve site HS22 (BrP4) (West of Brookmans Park Station) and the new additional sites BrP1 at Bell Bar and BrP34 at Brookmans Park Transmitting Station. Traffic on the A1000 would increase as a result of these latter two developments, but the cumulative impact of the Brookmans Park developments on highway function or safety is not considered by HCC to be severe.

### ***Utilities***

- 18.29 In terms of sewerage infrastructure, new development at Brookmans Park will drain to the Blackbirds and Maple Lodge sewage treatment works in the south-west of the county. During the Plan period, substantial additional development in neighbouring districts, as well as development in Welwyn Hatfield, will drain to these works. Thames Water has raised no issues with either infrastructure capacity or lead-in times in relation to the development of these sites, as any improvements to the network or the sewage treatment works will be programmed in, in accordance with the pace of development.

### **Strategic Advantages/Disadvantages**

- 18.30 These include, the opportunity to improve access and the approach to Brookmans Park from the west and as part of planning for the school, help to alleviate the existing parking issues associated with the existing school at Bradmore Way. It is proposed that a new footbridge would also be provided to provide pedestrian access from BrP4 across the railway line via sustainable modes, such as walking and cycling.
- 18.31 BrP34 currently provides 2,877sqm of employment provision and provides an opportunity for mixed-use development including a further 10,623 sqm employment provision in addition to the residential development described above. Clearly this would be advantageous in not only contributing to the Borough's employment requirements, but also providing more employment at a local scale therefore helping to improve the sustainability of the proposed development at Bell Bar and Brookmans Park.

## Green Belt Matters

- 18.32 Following the Stage 3 assessment, six sites are proposed for allocation in the Local Plan at Bell Bar and Brookmans Park. Three of these sites were included in the Local Plan 2016, as submitted, and three are additional.
- 18.33 Consideration is needed for how the Green Belt boundary could be amended to Bell Bar and Brookmans Park as a whole, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 18.34 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 18.35 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 18.36 As discussed, it is proposed that two sites are not recommended for allocation as their release would lead to 'very high' and 'high' harm, BrP5 and BrP6, respectively. A smaller parcel of BrP12 (i.e. BrP12a) is also recommended to reduce impact of development on this site to the minimum extent to ensure the Green Belt boundary overall is coherent for Bell Bar and Brookmans Park as a whole, to avoid the need to release a much wider area
- 18.37 Furthermore, it is proposed that a buffer is provided within site BrP4 to Brick Kiln Wood to the west of the site and also to exclude development on areas of flood risk to the south of the site, thus reducing the developable area and providing opportunities for landscape mitigation.
- 18.38 Taken together, the assessment findings and recommendations, at a site-by-site level, to exclude some sites and to reduce the development areas of others are considered to minimise the impact on the Green Belt to the lowest reasonable practical extent.
- 18.39 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 18.1**.

## **Proportional Distribution**

- 18.40 The proportion of households located at Bell Bar and Brookmans Park is 3% of the Borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 3.4%, thus demonstrating that the original local plan, as submitted, was successful in ensuring that the proposed allocations were distributed reasonably consistently.
- 18.41 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the original local plan, as submitted, and because the next most sustainable locations for development will be at the large excluded (inset) villages, such as Bell Bar and Brookmans Park.
- 18.42 For the reasons set out above, it is inevitable that the proportion of growth at Bell Bar and Brookmans Park is increased by proposing additional development sites at these settlements. As a result of the sites proposed in this paper, the proportion goes up to 6.3%.
- 18.43 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## **Conclusions**

- 18.44 The site selection process has tested 17 additional sites, in addition to re-appraising those sites proposed in the Local Plan 2016. This work has resulted in three additional sites being proposed for allocation at Bell Bar and Brookmans Park in addition to the three already proposed in the Local Plan 2016. The number of dwellings to be delivered at the Local Plan 2016 site (BrP4) is increased from 250 to 300 dwellings.
- 18.45 Consideration has been given to minimising harm to the Green Belt, to ensuring the proposed change to Green Belt boundaries are robust and defensible and that the level of development is sustainable. The proposals include provision for a new primary school and over 10,000sqm additional employment (B class use) space.
- 18.46 The site BrP4 would lead to 'high' harm to the Green Belt, but it is considered that on balance, and following the detailed assessment, that allocation of this site is justified, and the degree of impact on the Green Belt can be minimised,

both for the site, by providing a buffer to the west of the site and avoiding development on the southern portion of the site, and at a settlement level, by ensuring the separation between Welham Green to the north and Potters Bar to the south is maintained. This would not be the case of alternative sites BrP5 and BrP6 were taken forward.

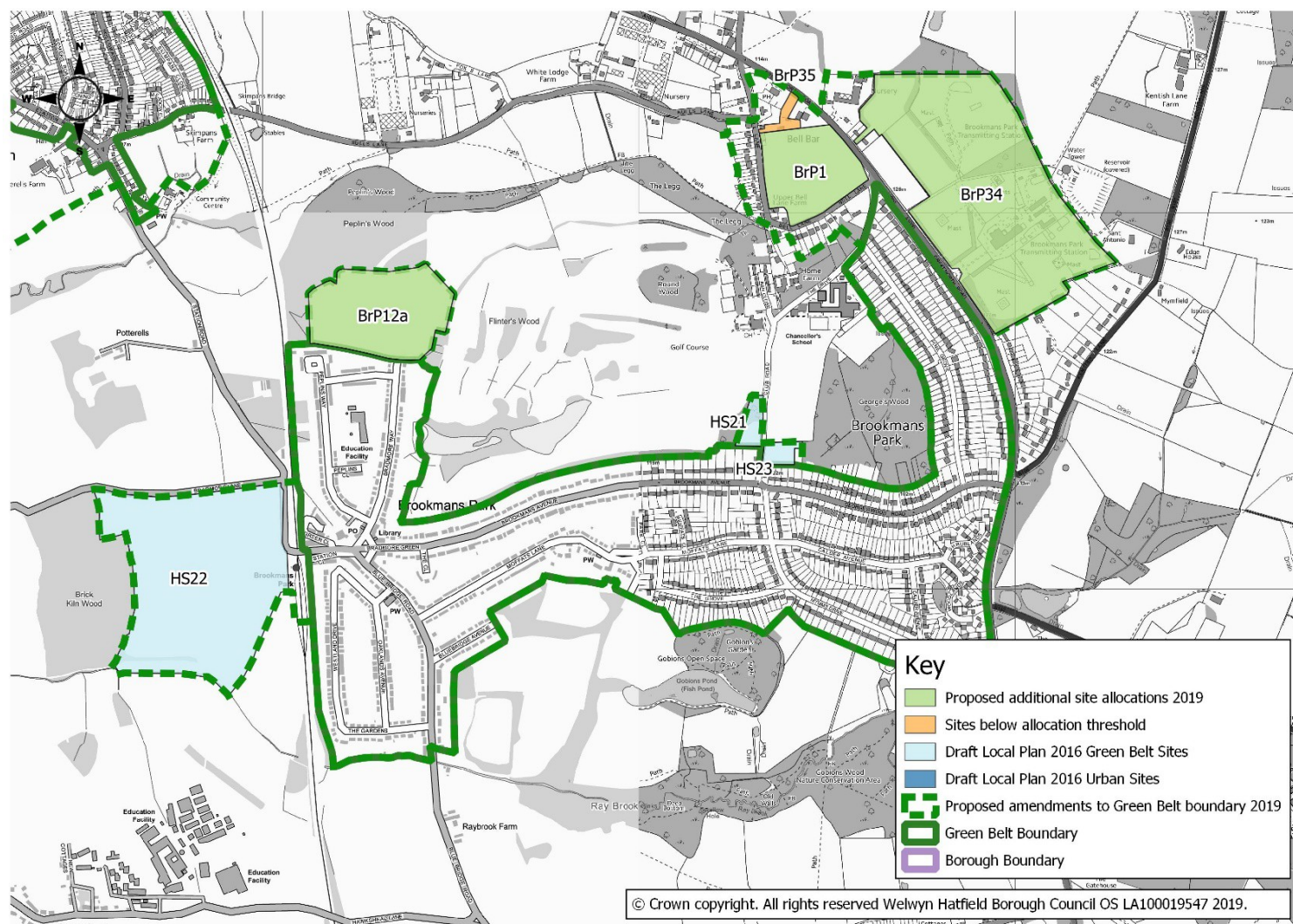
18.47 **Table 18.5** lists those sites recommended for allocation in the Local Plan at Bell Bar and Brookmans Park.

**Table 18.5: Sites proposed for allocation in the emerging Local Plan at Bell Bar and Brookmans Park as updated in 2019**

Draft Local Plan ref	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
HS22	BrP4	Land west of Brookmans Park Railway Station	Green Belt	Local Plan 2016 site. Dwelling numbers increased to 300	300
HS21	BrP13	Land west of Golf Club Road	Green Belt	Local Plan 2016 site	14
HS23	BrP14 (and part of BrP14a)	Land east of Golf Club Road	Green Belt	Local Plan 2016 site plus a small part of site BrP14a	10
N/A	BrP1	Upper Bell Lane Farm	Green Belt	Considered for allocation	104
N/A	BrP12a	Land north of Peplins Way	Green Belt	Considered for allocation	125
N/A	BrP34	Brookmans Park Transmitting Station	Green Belt	Considered for allocation	300 + 10,000sqm employment
<b>Total</b>					<b>853 + 10,000sqm employment floorspace</b>

18.48 A map of Bell Bar and Brookmans Park has been prepared to illustrate the sites proposed for allocation, along with those sites that are too small to be allocated (less than 5 dwellings) and those found to be unsuitable. This is shown in **Figure 18.1** and **Appendix B**.

**Figure 18.1: Sites proposed for allocation including changes to the Green Belt boundary at Bell Bar and Brookmans Park to inform the emerging WHBC Local Plan**



## 19. Swanley Bar

### Draft Local Plan 2016: Sites Proposed for Allocation

- 19.1 There were no sites proposed for allocation in the Draft Local Plan 2016 for this settlement.

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 19.2 The 2019 site selection process considered five additional sites, or site options. Three of the additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 19.1** that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 19.1: Results of Stages 1 and 2 (HELAA 2019) of the site selection process at Swanley Bar**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
SB1	Land south of Swanley Bar Lane - scenario 1	Green Belt	N/A	159
SB1a	Land south of Swanley Bar Lane - scenario 2	Green Belt	N/A	64*
SB1b	Land south of Swanley Bar Lane - scenario 3	Green Belt	N/A	25*
SB2	Swanley Bar Lane / Great North Road	Green Belt	Site does not lie within or adjoin a settlement identified in the LUC GB Study 3	0
SB3	104 Hawkshead Road	Green Belt	Access issues	0
<b>Total</b>				<b>159</b>

\*Where scenarios apply, only one capacity figure is included (in this case, the highest) in the total to avoid triple counting

- 19.3 There were no sites proposed at Swanley Bar for employment uses and this matter is not considered further.

### Site Selection 2019: Stage 3 – Detailed Assessment

- 19.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 19.1**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 19.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 19.6 Swanley Bar falls into the lowest tier of settlements in **Policy SP3: Settlement Hierarchy** ‘Small Green Belt Villages and Settlements’ that are washed-over by the Green Belt and that are generally not considered suitable for further development.
- 19.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 19.8 At Swanley Bar, all of the three site scenarios being considered that fall into a ‘high’ harm parcel in Green Belt terms, which are sites SB1, SB1a and SB1b. The area covered by these sites is important for protecting separation between settlements and is important for preventing unrestricted sprawl of large built-up areas, such as Potters Bar and Brookmans Park. On this basis, the allocation of any of these site scenarios is not supported.
- 19.9 On this basis, and following the detailed Stage 3 assessment, none of the three site scenarios are considered appropriate for allocation. These are shown by **Table 19.2** along with a brief description of the reasons for the conclusions reached.



**Table 19.2: Stage 3 Detailed Assessment at Swanley Bar.**

<b>DLP 2016 (Site Ref)</b>	<b>HELAA 2019 (Site Ref)</b>	<b>Site Name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
N/A	SB1	Land south of Swanley Bar Lane - scenario 1	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	SB1a	Land south of Swanley Bar Lane - scenario 2	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	SB1b	Land south of Swanley Bar Lane - scenario 3	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
<b>Total</b>					<b>0</b>

#### **Stage 4 - Settlement Level Assessment**

19.10 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

19.11 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

## **Key Infrastructure Issues**

- 19.12 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. Swanley Bar was not identified as a separate settlement in the 2016 paper, but fell within the Rural Areas (south). Given that none of the 2019 promoted sites in Swanley Bar have passed the Stage 3 assessment and that none are therefore proposed for allocation in the Plan, no further detailed infrastructure assessment has been undertaken.

## **Strategic Advantages/Disadvantages**

- 19.13 No strategic advantages or disadvantages have been identified in relation to the proposed development sites at Swanley Bar.

## **Green Belt Matters**

- 19.14 There are no sites proposed at Swanley Bar within the Stage 4 assessment.

## **Proportional Distribution**

- 19.15 The proportion of households located at Swanley Bar is 0.3% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 0%, thus the original draft local plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.
- 19.16 As there are no sites proposed in this paper to be allocated at Swanley Bar, the proportion of growth does not change and remains at 0%.
- 19.17 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## **Conclusions**

- 19.18 The site selection process has tested three additional sites, there were no sites proposed in the Local Plan 2016. This work has resulted in no additional sites being proposed for allocation at Swanley Bar. All sites under consideration fall into 'high' harm parcels and their allocation is considered to not be outweighed by any advantages associated with the development.
- 19.19 A map of Swanley Bar has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found in **Appendix B**.

## 20. Little Heath

### Draft Local Plan 2016: Sites Proposed for Allocation

- 20.1 There were two sites proposed for allocation in the Draft Local Plan 2016 for this settlement. These are listed in **Table 20.1** that also identifies whether the sites are located within an urban or Green Belt location.

**Table 20.1: Sites proposed for allocation in the Draft Local Plan 2016 at Little Heath**

Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS24	BrP7	Land south of Hawkshead Road	Green Belt	100
HS25	LHe1	Land north of Hawkshead Road	Green Belt	35
<b>Total</b>				<b>135</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 20.2 The 2019 site selection process considered three additional sites along with the original Draft Local Plan sites listed in **Table 20.1**. All of the additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 20.2**. There were no sites that failed the HELAA stages.

**Table 20.2: Results of Stages 1 and 2 of the Site Selection process (HELAA 2019) at Little Heath**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
LHe3	Land south of Hawkshead Road	Green Belt	N/A	47
LHe4	Studlands, Hawkshead Road	Green Belt	N/A	12
LHe5	Videne, Hawkshead Road	Green Belt	N/A	51
<b>Total</b>				<b>110</b>

- 20.3 There were no sites proposed at Little Heath for employment uses, therefore this matter is not considered further.

### Site Selection 2019: Stage 3 – Detailed Assessment

- 20.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 20.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 20.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 20.6 Little Heath is classified in **Policy SP3: Settlement Hierarchy** as a ‘small excluded village’ where the focus is for a limited amount of new development. It is however a relatively sustainable location being close to the higher order settlement of Potters Bar in adjoining Hertsmere Borough. It scores relatively well in the Sustainability Appraisal and has relatively good access to public transport.
- 20.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 20.8 At Little Heath, there are two sites being considered that fall into a ‘high’ harm parcel in Green Belt terms, which are sites BrP7 and LHe3. BrP7 (HS25) was identified in the Local Plan 2016, as submitted. LHe3 would essentially form an extension of BrP7, should it be considered appropriate for allocation.
- 20.9 Both of these sites fall within Parcel 78b within the Green Belt Study (Stage 3) that, if released in their entirety, would lead to ‘high’ harm to the Green Belt. This land is particularly important for maintaining separation between Swanley Bar and Boltons Park College and Little Heath. Protection of this separation is important, although it is considered that if development to the north of the site, does not extend any further north than the development on the northern side of Hawkshead Road, that any impact on the separation, and to the wider Green Belt could be limited. On this basis, the allocation, as proposed in the Local Plan 2016, continues to be supported, but it is considered that the site area should not be extended.

- 20.10 The site LHe1 (HS24) was also identified in the Local Plan 2016. This site is relatively small, falls within a 'moderate – low' parcel within the Green Belt Study (Stage 3) and is relatively contained to the south and east. It is proposed that development does not extend north beyond the boundary of existing neighbouring development.
- 20.11 The sites LHe4 and LHe5 fall within parcels that lead either to 'high' or 'moderate' harm within the Green Belt Study (Stage 3). However, if development does not extend further north than Parcel 80a as set out in the Green Belt Study, then harm to the Green Belt is reported to be 'moderate'. The smaller extent of development, i.e. the southern part of the site falling within Parcel 80a (Green Belt Study Stage 3) is also bound to the west by existing properties, development on these parcels would not extend any further to Swanley Bar, or have any negative impact on separation.
- 20.12 For the reasons discussed above, the allocation of sites LHe1, LHe4 and LHe5, is considered appropriate, providing development does not extend further north than Parcel 80a, as set out in the Green Belt Study (Stage 3), resulting in a lower estimated dwelling capacity and noting that LHe4 can only come forward in association with LHe5 in order to achieve a satisfactory form of vehicular access. The potential capacity of these sites are therefore reduced to 33 dwellings.
- 20.13 On this basis, and following the detailed Stage 3 assessment, four of the five sites being considered, both Local Plan 2016 and two of the additional sites, are considered appropriate for allocation, providing the development areas are restricted as discussed. These are shown by **Table 20.3**.

**Table 20.3: Result of Stage 3 detailed assessment at Little Heath**

Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
HS24	BrP7	Land south of Hawkshead Road	Green Belt	Local Plan 2016 Site	100
HS25	LHe1	Land north of Hawkshead Road	Green Belt	Local Plan 2016 Site	35
N/A	LHe3	Land south of Hawkhead Road	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	LHe4	Studlands, Hawkshead Road	Green Belt	Combined with LHe5	0
N/A	LHe5	Videne, Hawkshead Road	Green Belt	Developable area reduced to limit Green Belt harm	36
<b>Total</b>					<b>171</b>

#### **Stage 4 - Settlement Level Assessment**

20.14 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages , and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

20.15 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors.

- 20.16 Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

- 20.17 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### **Secondary Schools**

- 20.18 The secondary school strategy employed by Hertfordshire County Council (HCC) is to consider the total growth in demand for places arising from developments to the south of Hatfield, including Welham Green, Brookmans Park, Little Heath and Cuffley. Existing secondary schools serving this area include Chancellors at Brookmans Park as well as schools in Potters Bar and Broxbourne Borough.
- 20.19 The demand for secondary school places arising from the housing growth across the Borough in the Draft Local Plan 2016 could be satisfactorily accommodated through providing two new secondary schools and limited expansion at certain existing secondary schools. The new school sites were at Birchall Garden Suburb in East Herts (EWEL1) and at North-west Hatfield (SDS5 (Hat1)). These schools were sized at 6-8FE and 8-10FE respectively.
- 20.20 In 2019, with additional housing sites being added, HCC has assessed that to accommodate the additional demand arising from the southern villages (about 3.7FE in total) together with additional growth in the Welwyn Garden City and Hatfield areas, a third new secondary school at 6-8FE will be required, preferably in the south Hatfield area. The preferred location for this school is at the HCC-owned site of New Barnfield, Travellers Lane, Hatfield.
- 20.21 A Statement of Common Ground exists between the Council and HCC, in which HCC commits to making the New Barnfield site available for a new secondary school subject to certain caveats. The site is currently allocated as a waste site in HCC's adopted Waste Site Allocations Plan from 2014, however this allocation is no longer required, subject to the Council working with HCC to identify a new site for a Household Waste Recycling Centre. This work is well underway, with a planning application submitted for a site at Tewin Road in Welwyn Garden City.

- 20.22 As regards Chancellors School, HCC advises that 1FE of capacity has been prioritised for Hatfield pupils from 2019. The provision of the new school at south Hatfield would release capacity at Chancellors for pupils living further south in the Borough, including Little Heath.

### ***Primary schools***

- 20.23 Taken with the planned growth in the Draft Local Plan 2016, the scale of growth proposed in 2019 is 168 dwellings in Little Heath, equivalent to just over 0.3FE. HCC is satisfied that there is sufficient expansion capacity at the existing Little Heath Primary School to accommodate this growth. There could also be some 'pushback' of pupil numbers from this school to other schools in nearby settlements, thereby improving the capacity available at Little Heath.

### ***Highways***

- 20.24 Transport modelling work has been undertaken using Hertfordshire County Council's COMET model to assess increases in congestion and waiting times at key junctions on the network, which are likely to arise as a result of development of the selected local plan sites.
- 20.25 Within Little Heath, the junction of Hawkshead Road with the A1000 Great North Road has been raised in earlier HCC work as of some potential concern, due to increased congestion and delay likely to arise from the cumulative impact of developments in Little Heath. This impact is not considered to be severe, but as a minimum a right turn lane at this junction should be considered.

### ***Utilities***

- 20.26 In terms of sewerage infrastructure, new development at Little Heath will drain to the Blackbirds and Maple Lodge sewage treatment works in the south-west of the county. During the Plan period, substantial additional development in neighbouring districts, as well as development in Welwyn Hatfield, will drain to these works. Thames Water has raised no issues with either infrastructure capacity or lead-in times in relation to the development of these sites, as any improvements to the network or the sewage treatment works will be programmed in, in accordance with the pace of development.

### **Strategic Advantages/Disadvantages**

No strategic advantages or disadvantages have been identified in relation to the proposed development sites at Little Heath.



## Green Belt Matters

- 20.27 Following the Stage 3 assessment, four sites are proposed for allocation in the Local Plan at Little Heath. Two of these sites were included in the Local Plan 2016, as submitted, and two are additional.
- 20.28 Consideration is needed for how the Green Belt boundary could be amended to Little Heath as a whole, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent<sup>5</sup>.
- 20.29 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 20.30 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 20.31 As discussed, only one site, as proposed, falls within a 'high' harm category (BrP7), which is proposed for allocation. However, the area proposed for development is substantially smaller than the wider parcel and should not extend further west than existing development to the north of Hawkshead Road. It is considered that impacts can therefore be reduced to their lowest reasonable extent by limiting development as discussed and also protecting the separation between settlements. The site should not be extended to the west and the additional site LHe3 is not supported.
- 20.32 The other two additional sites, LHe4 and LHe5, are proposed for development providing the site areas are limited to the south of the sites and not extending any further north than Parcel 80a (Green Belt Study Stage 3). It is considered that impacts are limited to the lowest reasonable extent by limiting development to the 'moderate' harm parcel (P80a) and ensuring that development does not extend further west than the existing development thus not impacting separation between Little Heath and Swanley Bar. On balance, these sites are considered appropriate for allocation.
- 20.33 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 20.1**.

---

<sup>5</sup> Paragraph 139(f) NPPF 2019.

## Proportional Distribution

- 20.34 The proportion of households located at Little Heath is 1.0% of the Borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 1.7%, thus the original Draft Local Plan, as submitted, was proposing a level of growth above that necessary to achieve a proportional distribution.
- 20.35 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the original local plan, as submitted.
- 20.36 As a result of the sites proposed in this paper, the proportion at Little Heath changes to 1.4%. Because the level of additional growth is proportionally increased to a greater extent elsewhere, i.e. at the larger villages, the proportion at Little Heath actually comes down, thus making the level of proposed growth at Little Heath closer to that necessary to meet a proportional distribution.
- 20.37 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## Conclusions

- 20.38 The site selection process has tested three additional sites, in addition to re-appraising those sites proposed in the Local Plan 2016. This work has resulted in two additional sites being proposed for allocation at Little Heath, in addition to the two sites already proposed in the Local Plan 2016.
- 20.39 Little Heath is classified as a 'small excluded village' and is considered to be a relatively sustainable location for development. The level of development proposed falls below that necessary to achieve a proportional distribution.
- 20.40 By restricting the area of proposed development, as discussed, it is considered that impact to the Green Belt can be limited to the lowest reasonable practical extent.
- 20.41 **Table 20.4** lists those sites recommended for allocation in the Local Plan at Little Heath.

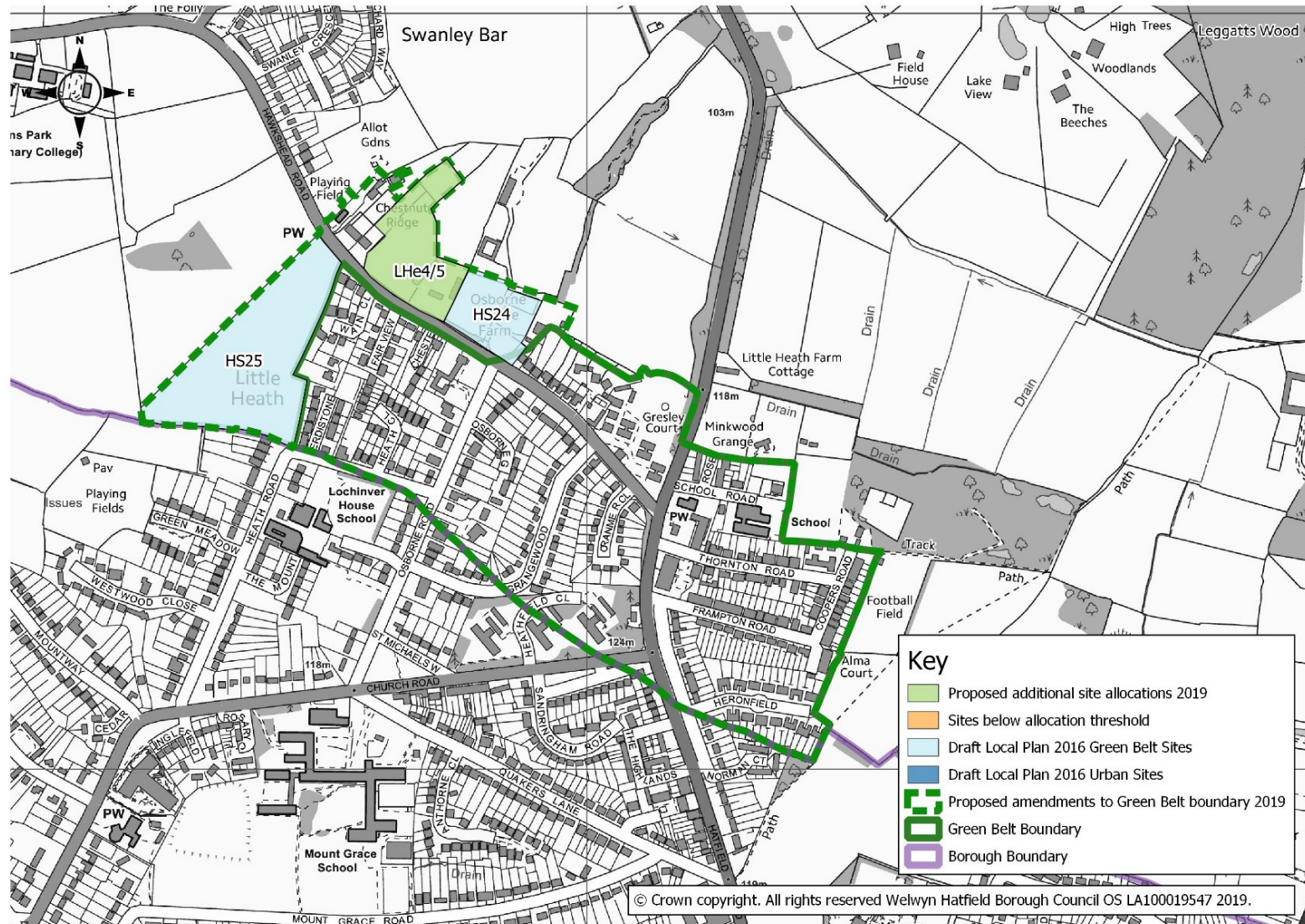
**Table 20.4: Sites proposed for allocation in the emerging Local Plan at Little Heath as updated in 2019.**

Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
HS24	BrP7	Land south of Hawkshead Road	Green Belt	Local Plan 2016 Site	100
HS25	LHe1	Land north of Hawkshead Road	Green Belt	Local Plan 2016 Site	35
N/A	LHe4	Studlands, Hawkshead Road	Green Belt	Combined with LHe5	0
N/A	LHe5	Videne, Hawkshead Road	Green Belt	Developable area reduced to limit Green Belt harm	36
<b>Total</b>					<b>171</b>

**20.42** A settlement map been prepared to illustrate all the above sites including the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 20.1**.

20.43 A map of Little Heath has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

**Figure 20.1: Proposed change to Green Belt boundary at Little Heath to inform the emerging WHBC Local Plan as updated in 2019**



## 21. Newgate Street

### Draft Local Plan 2016: Sites Proposed for Allocation

- 21.1 There were no sites proposed for allocation in the Draft Local Plan 2016 for this settlement.

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 21.2 The 2019 site selection process considered seven additional sites, or site options. Five of the additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 21.1** that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 21.1: Results of Stages 1 and 2 (HELAA 2019) of the site selection process at Newgate Street**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
NS1	Land adj. Tolmers Park, Carbone Hill	Green Belt	N/A	12
NS2	Coach and Horses	Green Belt	N/A	4
NS3a	Tolmers Park Farm (scenario a)	Green Belt	N/A	29*
NS3b	Tolmers Park Farm (scenario b)	Green Belt	N/A	50*
NS3c	Tolmers Park Farm (scenario c)	Green Belt	N/A	69*
NS4	Land to the east of Newgate Street Village	Green Belt	Site does not lie within or adjoin a settlement identified in the LUC GB Study 3	0
NS5	Land at Ponsbourne Park	Green Belt	Site does not lie within or adjoin a settlement identified in the LUC GB Study 3	0
<b>Total</b>				<b>85</b>

\*Where scenarios apply, only one capacity figure is included (in this case the highest), in the total to avoid double counting

- 21.3 There were no sites proposed at Newgate Street for employment uses and this matter is not considered further.

### Site Selection 2019: Stage 3 – Detailed Assessment

- 21.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 21.1**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 21.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 21.6 Newgate Street is classified in **Policy SP3: Settlement Hierarchy** as a ‘Green Belt Village’ where there is considered to be limited scope for Green Belt compatible development.
- 21.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 21.8 The sites under consideration at Newgate Street all fall into a ‘high’ harm parcel within the Green Belt study and a ‘moderate – high’ parcel within the Landscape Sensitivity Study. However, it could be argued that the sites are small and are, at least in part, enclosed and contain some existing built development. The site NS1 for example, is contained with existing development and mature trees. The site NS3 (considered as three different parcels) contains some existing built development and is partly contained.
- 21.9 However, the settlement of Newgate Street falls within one of the lowest tiers within the Settlement Hierarchy (SP3) that is washed over by Green Belt with limited opportunities for development, providing it is Green Belt compatible. It is therefore questionable, if exceptional circumstances exist to justify in-setting the settlement as a whole from the Green Belt to allocate sites for a relatively limited scale of development, potentially around 40 dwellings if NS1 and NS3a were proposed for allocation.
- 21.10 On this basis, and following the detailed Stage 3 assessment, none of the additional sites are considered appropriate for allocation. These are shown by **Table 21.2** along with a brief description of the reasons for the conclusions reached.

**Table 21.2: Results of the Stage 3 Detailed Assessment at Newgate Street**

<b>DLP 2016 (Site Ref)</b>	<b>HELAA 2019 (Site Ref)</b>	<b>Site Name</b>	<b>Urban / Green Belt</b>	<b>Notes</b>	<b>Number of Dwellings</b>
N/A	NS1	Land adj. Tolmers Park, Carbone Hill	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	NS2	Coach and Horses	Green Belt	Too small to be allocated – does not fall within an inset settlement	0
N/A	NS3a	Tolmers Park Farm (scenario a)	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	NS3b	Tolmers Park Farm (scenario b)	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	NS3c	Tolmers Park Farm (scenario c)	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
<b>Total</b>					<b>0</b>

#### **Stage 4 - Settlement Level Assessment**

21.11 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

21.12 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

## **Key Infrastructure Issues**

- 21.13 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. Newgate Street was not identified as a separate settlement in the 2016 paper, but fell within the Rural Areas (south). Given that none of the 2019 promoted sites in Newgate Street have passed the Stage 3 assessment and that none are therefore proposed for allocation in the Plan, no further detailed infrastructure assessment has been undertaken.

## **Strategic Advantages/Disadvantages**

- 21.14 No strategic advantages or disadvantages have been identified in relation to the proposed development sites at Newgate Street.

## **Green Belt Matters**

- 21.15 As there are no additional sites proposed at Newgate Street there is no need to consider the cumulative impacts or potential changes to the Green Belt boundaries any further.

## **Proportional Distribution**

- 21.16 The proportion of households located at Newgate Street is 0.4% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 0%, thus the original draft local plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.
- 21.17 As no additional sites are proposed the proportion of growth remains at 0% and is thus still below a level necessary to support proportional distribution.
- 21.18 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 6**.

## **Conclusions**

- 21.19 The site selection process has tested five additional sites at Newgate Street. However, given that these sites fall within 'high' harm parcels, and as a result of the assessment overall, especially as it would be necessary to inset the settlement as a whole from the Green Belt for what would amount to a limited level of development, it is not considered that additional allocations are appropriate at this settlement.



21.20 A map of Newgate Street has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

## 22. Cuffley

### Draft Local Plan 2016: Sites Proposed for Allocation

- 22.1 There were six sites proposed for allocation in the Draft Local Plan 2016 for this settlement. These are listed in Table 22.1 that also identifies whether the sites are located within an urban or Green Belt location.

**Table 22.1: Sites proposed for allocation in the Draft Local Plan 2016 at Cuffley**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS26	No02	36 The Ridgeway and land to the rear	Urban	8
HS27	Cuf1	Land at the Meadway	Green Belt	30
HS28	Cuf6	Land south of Northaw Road East	Green Belt	108
HS29	Cuf12	Land north of Northaw Road East	Green Belt	73
HS30	Cuf7	Wells Farm, Northaw Road East	Green Belt	75
HS31	No10	Land west of St Martin de Porres Catholic Church	Urban	5
<b>Total</b>				<b>299</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 22.2 The 2019 site selection process considered 13 additional sites, or site options, along with the original Local Plan sites listed in Table 22.1. Eight of the additional sites failed the HELAA stages (Stages 1 and 2) and five additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by Table 22.2 that also lists those sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 22.2: Results of Stages 1 and 2 (HELAA 2019) of the site selection process at Cuffley**

HELAA 2019 (site ref)	Site Name	Urban / Green Belt	Reason for Exclusion	HELAA 2019 capacity
No95	Part of the Sopers Road Employment Area	Urban	Not suitable for residential development	0
Nor2	Hill View Farm, Northaw Road West	Green Belt	Site does not adjoin an excluded settlement	0
Cuf5	Land at Northaw Road East	Green Belt	N/A	412*
Cuf10	Land adjacent 1 The Ridgeway	Green Belt	N/A	32
Cuf11	Cuffley Hills Barn	Green Belt	N/A	4
Cuf12a**	Land at Northaw Road East	Green Belt	N/A	139
Cuf13	Colesdale Farm	Green Belt	Site does not adjoin an excluded settlement	0
Cuf14	Land to the east of Colesdale Farm	Green Belt	Site does not adjoin an excluded settlement	0
Cuf15	Land to south east of KGV playing fields	Green Belt	N/A	176
Cuf16	Northaw Pumping Station, Northaw Road East	Green Belt	Lack of suitable access	0
Cuf17	Land at Nyn Manor (1)	Green Belt	Site does not adjoin an excluded settlement	0
Cuf17a	Land at Nyn Manor (2)	Green Belt	Site does not adjoin an excluded settlement	0
Cuf17b	Land at Nyn Manor (3)	Green Belt	Site does not adjoin an excluded settlement	0
<b>Total</b>				<b>763</b>

\*The capacity of Cuf5 would be reduced to 376 if the site also accommodated a primary school.

\*\*Shown as Cuf12 in the 2019 consultation document.

22.3 There were no sites proposed at Cuffley for employment uses and so this is not considered further in this section.

## Site Selection 2019: Stage 3 – Detailed Assessment

- 22.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 22.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 22.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 22.6 Cuffley is a sustainable location for development that falls within the third tier of settlement in **Policy SP3: Settlement Hierarchy** being a ‘large excluded village’ that is inset from the Green Belt and following the two main towns at Welwyn Garden City and Hatfield. Cuffley offers a range of services and facilities, including some employment opportunities and benefiting from good public transport connectivity including a railway station. The settlement scores well in the Sustainability Appraisal.
- 22.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be suitable for development.
- 22.8 For these reasons sites Cuf5, Cuf10, Cuf11 and Cuf12a are ruled out as not being appropriate for allocation. Cuf12a is a re-submitted site that essentially covers an extended area to HS29 (Cuf12), which is identified in the Draft Local Plan 2016. These sites would result in ‘high’ harm to the Green Belt if they were released for development and would lead to encroachment of the countryside and negatively impact the separation between Cuffley and Potters Bar. The parcel is open and rural in character and strongly distinct from Cuffley. The topography of the land is particularly relevant for these sites, located to the west of Cuffley, as the land falls away sharply from the settlement such that any development here would significantly impact the setting of the settlement and negatively affect the Green Belt. The allocation of these sites is not supported.
- 22.9 Two sites are identified in the Local Plan 2016 to the west of Cuffley that adjoin those sites listed above, HS30 (Cuf7) and HS29 (Cuf12). These also

fall within a parcel that would lead to 'high' harm if they were released. However, HS30 (Cuf7) is partly developed with some existing hedgerows surrounding the site. The inclusion of HS29 (Cuf12) i.e. the land between Cuf7 and the existing settlement edge, and excluding the remainder of the much wider Cuf12a site, would provide an opportunity to create defensible Green Belt Boundaries. These would be formed to the south east and west of the site along existing highways and to the north west of the proposed allocation by creating and strengthening a tree/ landscape belt. This approach is considered to minimise any impact to the lowest reasonable practical extent, whilst still supporting some development at a highly sustainable settlement.

- 22.10 Two existing Local Plan 2016 sites, HS26 (No02) and HS31 (No10) are urban thus resulting in no Green Belt impacts if brought forward. Two further Draft Local Plan 2016 sites would lead to 'moderate' harm to the Green Belt HS27 (Cuf1) and HS28 (Cuf6). Whilst these sites are partly open and would lead to some encroachment of the countryside, they do not extend the settlement edge of Cuffley to the east, thus not impacting the separation between Cuffley and Goffs Oak. It is considered that clearly defined boundaries can be created for these sites and they continue to be considered suitable for allocation.
- 22.11 One further site is considered at Cuffley (Cuf15). This site falls within a 'moderate – high' parcel within the Green Belt Study (Stage 3) and its release would result in encroachment of the countryside. However, development of this site would not extend the settlement edge further east than the existing eastern edge of the settlement or further south-west than the edge of site HS30 (Cuf7), which is proposed for allocation in the Draft Local Plan 2016. Part of the southern part of the site can be excluded from development to exclude areas of higher flood risk and a woodland buffer is proposed for the north-western and eastern parts of the site. It is considered that Green Belt boundaries can be created that are robust and defensible and similar in strength to the existing. The allocation of this site is therefore considered appropriate.
- 22.12 One site proposed for allocation in the Draft Local Plan 2016, HS28 (Cuf6) for 108 dwellings is the subject of an outline planning application. Whilst the application has not yet been determined, it is considered that sufficient evidence exists to demonstrate that it would be possible in principle to accommodate 121 dwellings on this site, should the site be taken forward. Accordingly, it is considered appropriate to increase the estimated capacity from 108 to 121 dwellings.

22.13 On this basis, and following the detailed Stage 3 assessment, there is one additional site considered appropriate for allocation in addition to the six sites identified in the Draft Local Plan 2016. These are shown by **Table 22.3**, which also lists those sites not considered appropriate following the Stage 3 assessment along with a brief description of the reasons for the conclusions reached.

**Table 22.3: Results of the Stage 3 Detailed Assessment at Cuffley**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
HS26	No02	36 The Ridgeway and land to the rear	Urban	Local Plan 2016 Site.	5
HS31	No10	Land west of St Martin de Porres Catholic Church	Urban	Local Plan 2016 Site.	5
HS27	Cuf1	Land at the Meadway	Green Belt	Local Plan 2016 Site.	30
N/A	Cuf5	Land at Northaw road East	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
HS28	Cuf6	Land south of Northaw Road East	Green Belt	Local Plan 2016 Site.	121
HS30	Cuf7	Wells Farm, Northaw Road East	Green Belt	Local Plan 2016 Site.	75
N/A	Cuf10	Cuffley Hills Barn	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	Cuf11	Cuffley Hills Barn	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
HS29	Cuf12	Land at Northaw Road East	Green Belt	Local Plan 2016 Site.	73
N/A	Cuf12a	Land at Northaw Road East	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	Cuf15	Land to south east of KGV playing fields	Green Belt	N/A	176
<b>Total</b>					<b>485</b>

## **Stage 4 - Settlement Level Assessment**

22.14 The Stage 4 assessment provides the final level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries).

22.15 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

22.16 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### **Secondary Schools**

22.17 The secondary school strategy employed by Hertfordshire County Council (HCC) is to consider the total growth in demand for places arising from developments to the south of Hatfield, including Welham Green, Brookmans Park, Little Heath and Cuffley. Existing secondary schools serving this area include Chancellors at Brookmans Park as well as schools in Potters Bar and in Broxbourne Borough.

22.18 The demand for secondary school places arising from the housing growth across the Borough in the Draft Local Plan 2016 could be satisfactorily accommodated through providing two new secondary schools and limited expansion at certain existing secondary schools. The new school sites were at Birchall Garden Suburb in East Herts (EWEL1) and at North-west Hatfield

(SDS5 (Hat1)). These schools were sized at 6-8FE and 8-10FE respectively.

- 22.19 In 2019, with additional housing sites being added, HCC has assessed that to accommodate the additional demand arising from the southern villages (about 3.7FE in total) together with additional growth in the Welwyn Garden City and Hatfield areas, a third new secondary school at 6-8FE will be required, preferably in the south Hatfield area. The preferred location for this school is at the HCC-owned site of New Barnfield, Travellers Lane, Hatfield.
- 22.20 A Statement of Common Ground exists between the Council and HCC, in which HCC commits to making the New Barnfield site available for a new secondary school subject to certain caveats. The site is currently allocated as a waste site in HCC's adopted Waste Site Allocations Plan from 2014, however this allocation is no longer required, subject to the Council working with HCC to identify a new site for a Household Waste Recycling Centre. This work is well underway, with a planning application submitted for a site in Welwyn Garden City.
- 22.21 As regards Chancellors School, HCC advises that 1FE of capacity has been prioritised for Hatfield pupils from 2019. The provision of the new school at south Hatfield would release capacity at Chancellors for pupils living further south in the Borough, including Cuffley. It is expected that a significant proportion of secondary pupils from Cuffley will continue to attend Goffs School in Broxbourne Borough.

### ***Primary schools***

- 22.22 In 2019, the additional number of dwellings proposed for Cuffley, including those sites previously identified in the Draft Local Plan 2016, is 485. This is equivalent to almost 1FE. The existing Cuffley School does not have capacity to expand, therefore this additional 1FE demand would be met through a 1FE expansion of Woodside Primary School in Goffs Oak, in the neighbouring Borough of Broxbourne. HCC advises that, taking into account other new school capacity being built in Broxbourne in response to housing growth, there would be an additional 1FE of expansion capacity available at Andrews Lane School if required.

### ***Highways***

- 22.23 Transport modelling work has been undertaken using Hertfordshire County Council's COMET model to assess increases in congestion and waiting times at key junctions on the network, which are likely to arise as a result of development of the selected local plan sites.



- 22.24 Cuffley is located some distance away from the principal road network of the Borough, but experiences significant local congestion which can be exacerbated by the roads through the village being used at times as a diversion route from the M25. Significant delays regularly occur along Northaw Road East, with particular problems at the Cattlegate Road junction to the west of the village, and the Station Road junction in the village centre.
- 22.25 Although highway capacity mitigation measures were not originally covered by the transport modelling work, later COMET model runs do include provision for the priorities at the two key road junctions to be changed, which HCC as Highway Authority considers would improve traffic flow through the village and reduce queuing. Subject to these highway improvements, HCC does not consider that there will be a severe impact on the highway arising from the proposed additional sites.

### ***Utilities***

22.26 In terms of sewerage infrastructure, new development at Cuffley will drain to the Deephams sewage treatment works in Edmonton, north London. During the Plan period, substantial additional development in neighbouring districts, as well as development in Welwyn Hatfield, will drain to these works. The works have very recently been subject to a major upgrade. Accordingly, Thames Water has raised no issues with either infrastructure capacity or lead-in times in relation to the development of these sites, as any improvements to the network will be programmed in, in accordance with the pace of development.

### **Strategic Advantages/Disadvantages**

- 22.27 There are no strategic advantages or disadvantages associated with any of the proposed development sites at Cuffley other than that two of the promoted sites were offered as potential locations, either for a new primary school (Cuf5), or GP provision (Cuf5 and Cuf12). The possibility of a school and GP surgery at Cuf5 was not a factor of sufficient weight to overcome the weight of the harm that would be caused to the Green Belt through allocation of Cuf5 as a housing site. As stated in the Key Infrastructure Issues Section (above) there is an alternative solution to the education issue, not involving the allocation of Cuf5. Cuf12 was already proposed for allocation in the Draft Local Plan 2016 as HS29.

## Green Belt Matters

- 22.28 Following the Stage 3 assessment, seven sites are proposed for allocation in the Local Plan at Cuffley. Six of these sites were included in the Local Plan 2016, as submitted, and one is additional.
- 22.29 Consideration is needed for how the Green Belt boundary could be amended to Cuffley as a whole, to ensure, in accordance with national policy, that boundaries are defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 22.30 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 22.31 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the borough as a whole.
- 22.32 As discussed, the majority of the additional sites proposed at Cuffley are not supported for allocation as they would lead to 'high' impact to the Green Belt. The topography of the land is particularly relevant as it is both distinct and falls away sharply from the existing settlement. On this basis, only one additional site is proposed to be allocated to those already identified in the Draft Local Plan 2016. This site (Cuf15) would lead to encroachment of the countryside and Green Belt, but it would not extend the urban edge of the settlement further east than the existing edge or further south-west than development proposed at HS30 (Cuf7).
- 22.33 The other sites identified at Cuffley in the Draft Local Plan 2016 are either urban, thus leading to no Green Belt impacts, or fall within lower harm parcels and would not result in extending the urban edge of the settlement beyond the existing to the east .
- 22.34 It is therefore considered that Green Belt impacts can be reduced to their lowest reasonable practical extent by excluding those sites that would lead to 'high' harm and by ensuring that new Green Belt boundaries can be created that are robust and defensible. Development on the southern part of Cuf15 is excluded from development to ensure flood risk areas are undeveloped. A woodland buffer will also be created on the north-western and eastern parts of this site.

## Proportional Distribution

- 22.35 The proportion of households located at Cuffley is 4% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 3.7%, i.e. slightly below a level of development that would have achieved an equal distribution of development.
- 22.36 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. This is partly because the opportunities for finding additional sites at the two main towns is not unlimited, and most of the development opportunities at these two locations (Welwyn Garden City and Hatfield) will already have been utilised in the original local plan, as submitted, and because the next most sustainable locations for development will be at the large excluded (inset) villages, such as Cuffley.
- 22.37 For the reasons set out above, it is inevitable that the proportion of growth at Cuffley is increased by proposing additional development sites at this settlement. As a result of the sites proposed in this paper, the proportion goes up to 4.1%, which in this case, makes the proportion of development at Cuffley more consistent with the proportion of households located at the settlement.
- 22.38 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

## Conclusions

- 22.39 The site selection process has tested 13 additional sites, in addition to re-appraising those sites proposed in the Local Plan 2016. This work has resulted in one additional site being proposed for allocation at Cuffley in addition to the six already proposed in the Local Plan 2016.
- 22.40 Consideration has been given to minimising harm to the Green Belt, to ensuring the proposed change to Green Belt boundaries are robust and defensible and that the level of development is sustainable.
- 22.41 Cuffley is a sustainable location for development within the borough and falls into the most sustainable tier of settlement following only the two main towns of Welwyn Garden City and Hatfield. The lack of additional sites being put forward for allocation is a reflection on the topography of the sites proposed and the level of harm to the Green Belt that would result in their allocation. It is however the case that the relatively small increase in proposed

development at Cuffley leads to the proposed growth matching more closely the proportional distribution. I.e. Cuffley contains 4% of the boroughs households and this is matched with 4.1% of the proposed growth being directed to this settlement.

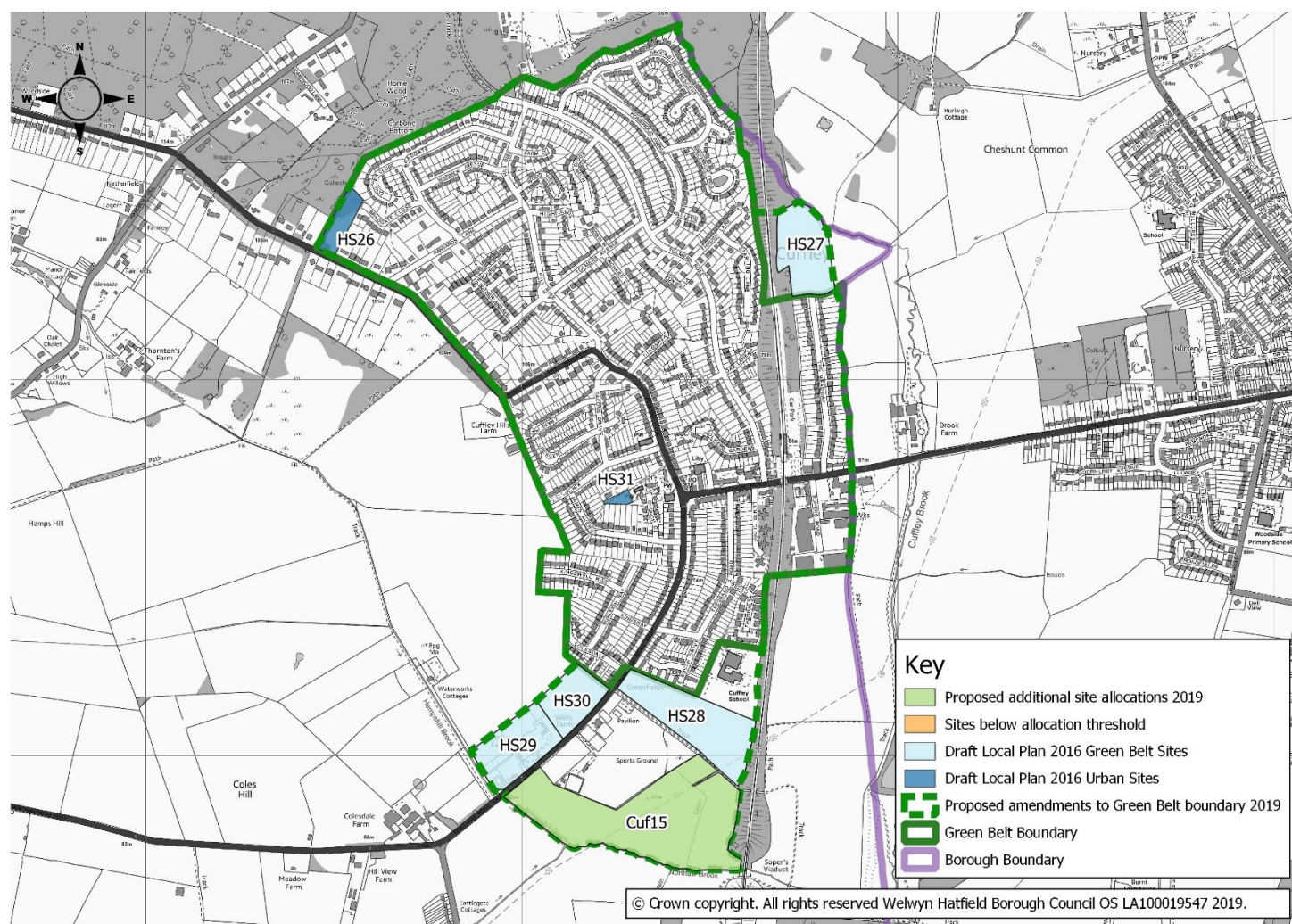
22.42 **Table 22.4** lists those sites recommended for allocation in the Local Plan at Cuffley.

**Table 22.4: Sites proposed for allocation in the emerging Local Plan at Cuffley as updated in 2019**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Notes	Number of Dwellings
HS26	No02	36 The Ridgeway and land to the rear	Urban	Local Plan 2016 Site. Updated capacity	5
HS31	No10	Land west of St Martin de Porres Catholic Church	Urban	Local Plan 2016 Site	5
HS27	Cuf1	Land at the Meadway	Green Belt	Local Plan 2016 Site	30
HS28	Cuf6	Land south of Northaw Road East	Green Belt	Local Plan 2016 Site. Updated capacity	121
HS30	Cuf7	Wells Farm, Northaw Road East	Green Belt	Local Plan 2016 Site	75
HS29	Cuf12	Land at Northaw Road East	Green Belt	Local Plan 2016 Site	73
N/A	Cuf15	Land to south east of KGV playing fields	Green Belt	Considered for Allocation	176
<b>Total</b>					<b>485</b>

22.43 A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 22.1**. A map of Cuffley has also been prepared to illustrate the sites proposed for allocation, along with those sites that are too small to be allocated (less than 5 dwellings) and those found to be unsuitable. This can be found at **Appendix B**.

**Figure 22.1: Proposed change to Green Belt boundary at Cuffley to inform the emerging WHBC Local Plan as updated in 2019**



## 23. Northaw

### Draft Local Plan 2016: Sites Proposed for Allocation

- 23.1 There were no sites proposed for allocation in the Draft Local Plan 2016 for this settlement.

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 23.2 The 2019 site selection process considered six additional sites, or site options. Two of the additional sites were found to be suitable, available and achievable and therefore progressed to the Stage 3 assessment. These are shown by **Table 23.1** that also lists that sites that failed the HELAA stage with a brief explanation for why they were found to be unsuitable.

**Table 23.1: Results of Stages 1 and 2 (HELAA 2019) of the site selection process at Northaw.**

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
Nor1	Land at Coopers Lane	Green Belt	Site does not lie within or adjoin a settlement identified in the LUC GB Study 3	0
Nor3	Northaw Place Coopers Lane	Green Belt	Site does not lie within or adjoin a settlement identified in the LUC GB Study 3	0
Nor12	The Grange Coopers Lane	Green Belt	Site does not lie within or adjoin a settlement identified in the LUC GB Study 3	0
Nor13	Land at Park Farm Northaw Road West	Green Belt	N/A	10
Nor13a	Land and buildings at Park Farm, Northaw Road West	Green Belt	N/A	(10)*
Nor14	Land north of Northaw Road West	Green Belt	Impact on Heritage Assets	0
<b>Total</b>				<b>10</b>

\*Note – Nor13 and Nor13a are alternative scenarios, only one capacity included in total to avoid double counting.

- 23.3 There were no sites proposed at Northaw for employment uses and this matter is not considered further.

### Site Selection 2019: Stage 3 – Detailed Assessment

- 23.4 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 23.1**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 23.5 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 23.6 Northaw is classified in **Policy SP3: Settlement Hierarchy** as a ‘Green Belt Village’ being washed-over by the Green Belt and where there is limited scope for new development if compatible with the Green Belt.
- 23.7 Given the importance of the Green Belt to the borough, particular consideration is given to the nature and extent of harm to the Green Belt that would result in releasing sites for development. It is therefore assumed within the Stage 3 Detailed Assessment that any additional sites that would result in ‘high’ harm, or ‘very high’ harm to the Green Belt, as identified in the Stage 3 Green Belt Study would not be appropriate for allocation.
- 23.8 At Northaw, the two sites being considered, Nor13 and Nor13a, fall into a ‘high’ harm parcel in Green Belt terms. Site Nor13a essentially forms an extended version of Nor13 and includes the buildings associated with New Park Farm.
- 23.9 The allocation of either of these sites would result in ‘high’ harm to the Green Belt in addition to the necessity to exclude (inset) Northaw from the Green Belt, which would, in itself, also lead to ‘high’ harm. The land slopes down from the settlement and release of the sites would lead to encroachment on the countryside. It is considered that any settlement expansion (through the release of any part of Nor13/13a) would weaken the distinction between the ridge top settlement and open valley sides, thus weakening the integrity of the wider Green Belt and diminishing settlement gaps.

23.10 The scale of impact at Northaw would clearly be less if the level of development was reduced to a very limited extent (the HELAA concluded that an estimated capacity of 10 dwellings on a limited part of each of the promoted site options considered), but any allocation would require the inseting of the settlement from the Green Belt, which is not considered to be justified for such a limited scale of development. Even this limited scale of growth would lead to high harm to the Green Belt and there is no potential for increasing the scale of growth without increasing the level of impact.

**23.11** On this basis, and following the detailed Stage 3 assessment, none of the sites are considered appropriate for allocation. These are shown by **Table 23.2** along with a brief description of the reasons for the conclusions reached.

**Table 23.2: Stage 3 Detailed Assessment at Northaw.**

DLP 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site name	Urban / Green Belt	Notes	Number of Dwellings
N/A	Nor13	Land at Park Farm Northaw Road West	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
N/A	Nor13a	Land and buildings at Park Farm, Northaw Road West	Green Belt	Harm to the Green Belt outweighs the benefits of the site	0
<b>Total</b>					<b>0</b>

#### **Stage 4 - Settlement Level Assessment**

23.12 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)



- 23.13 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

- 23.14 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. Northaw was not identified as a separate settlement in the 2016 paper, but fell within the Rural Areas (south). Given that none of the 2019 promoted sites in Northaw have passed the Stage 3 assessment and that none are therefore proposed for allocation in the Plan, no further detailed infrastructure assessment has been undertaken.

### **Strategic Advantages/Disadvantages**

- 23.15 No strategic advantages or disadvantages have been identified in relation to the proposed development sites at Northaw.

### **Green Belt Matters**

- 23.16 As there are no additional sites proposed at Northaw there is no need to consider the cumulative impacts or potential changes to the Green Belt boundaries and further

### **Proportional Distribution**

- 23.17 The proportion of households located at Northaw is 0.5% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Local Plan 2016 was 0%, thus the original draft local plan, as submitted, was proposing a level of growth below that necessary to achieve a proportional distribution.
- 23.18 As there are no sites proposed in this paper to be allocated at Northaw, the proportion of growth does not change and remains at 0%.
- 23.19 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 6**.

## Conclusions

- 23.20 The site selection process has tested six additional sites, there were no sites proposed in the Local Plan 2016. This work has resulted in no additional sites being proposed for allocation at Northaw. All sites under consideration fall into 'high' harm parcels and their allocation is considered to not be outweighed by any advantages associated with the development. Notwithstanding the harm associated with development, any proposals for allocation would necessitate the inseting of the settlement of Northaw as a whole and this is not considered appropriate, especially given the limited level of development under consideration.
- 23.21 A map of Northaw has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

## 24. Rural Areas

### Draft Local Plan 2016: Sites Proposed for Allocation

- 24.1 There were three sites proposed for allocation in the Draft Local Plan 2016 for the wider rural areas of the borough, i.e. outside of all of the individual settlements. These are listed in **Table 24.1** that also identifies whether the sites are located within an urban or Green Belt location.
- 24.2 However, it should be noted that as part of the Local Plan Examination Hearing Session 4, it was proposed that site HS34 (GTLAA09) be deleted from the plan<sup>6</sup> and on this basis, this site is not considered further in this section.

**Table 24.1: Sites proposed for allocation in the Draft Local Plan 2016 for the Rural Areas**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
SDS6	Hat15	Symondshyde – new village	Green Belt	1,130
HS33	GTLAA08	Barbaraville, Mill Green	Green Belt	4 pitches
HS34	GTLAA09	Coopers Green Lane, Hatfield	Green Belt	10 pitches
<b>Total</b>				<b>1,130 dwellings + 14 pitches</b>

### Site Selection 2019: Stage 1 and 2 – HELAA 2019

- 24.3 The 2019 site selection process considered eleven additional sites, or site options. In order to direct growth to the most sustainable locations within the borough, sites that do not lie within or adjoin an excluded settlement fail at the Stage 1 of the HELAA. Whilst certain exceptions apply, none of the eleven additional sites were considered to meet any of the exceptions<sup>7</sup>. As a result, none of the additional sites passed the Stage 1 sift and therefore did not progress to the Stage 2 or 3 assessment. These are shown by **Table 24.2** with a brief explanation for why they were found to be unsuitable.

<sup>6</sup> Provision for the ten pitches originally proposed at site HS34 is now proposed to be made at SDS6 Symondshyde (6 pitches), plus off-site delivery at HS33 (4 pitches). An increase in pitch provision will also apply at site SDS5 (from 11 to 15 pitches). Modifications follow the Examination Hearing Session, Stage 4

<sup>7</sup> An exception includes whether a site could form a new standalone village settlement. However, for such a new settlement to be considered sustainable, it was considered necessary to accommodate at least 1,000 dwellings as this would facilitate delivery of a two form-entry primary school and local centre. None of the sites considered here could accommodate this level of development, the largest was under 500 dwellings.

24.4 There were no sites proposed within the wider rural areas for employment uses and so this is not considered further in this section.

**Table 24.2: Results of Stages 1 and 2 (HELAA 2019) in the Rural Areas**

HELAA 2019 (Site ref)	Site Name	Urban / Green Belt	Reason for Exclusion	Number of Dwellings
RN1	Land between Danesbury Park Road and Reynard Road	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RN2	Land at Wych Elm Lane	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RN3 and RN3a	Land adjacent Saw Mill, 27 Ayot Green	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RN4	Brockett Hall Estate	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RN5	Land adjacent Ayot Greenway	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3.	0
BrP17	Land east of Swanland Road	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3.	0
RS1	Firs Wood Close	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RS1a	Firs Wood Close	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RS2	Essendon Pumping Station, Holwell Lane	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RS3	Land north of Queenswood School	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RS4	Ramsey Close	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
RS5	North Mymms Water Treatment site, Warrengate Road	Green Belt	Site does not adjoin an excluded settlement or lie within or adjoin a settlement identified in the LUC GB Study 3	0
<b>Total</b>				<b>0</b>

### Site Selection 2019: Stage 3 – Detailed Assessment

- 24.5 Stage 3 of the site selection process involved a more detailed assessment of the shortlisted sites, shown by **Table 24.2**, on a site-by-site basis and informed by a series of evidence and appraisals, as explained in Sections 7, 8 and 9 of this paper. These included consideration of the Green Belt Study, Sustainability Appraisal and the Calverton High Court Judgement that relates to how ‘exceptional circumstances’ are demonstrated for releasing Green Belt sites for development.
- 24.6 The individual site assessments are summarised in the site templates included in **Appendix A** of this paper and a brief summary of the findings are presented in the following paragraphs.
- 24.7 Given that none of the promoted sites listed in **Table 24.2** progressed to the Stage 3 assessment, the work here has really just considered if the existing proposals remain appropriate.
- 24.8 The inclusion of a proposed new village settlement was subject to substantial evidence and justification to inform the original Draft Local Plan 2016. This site (SDS6) falls within a ‘moderate – high’ harm parcel, but ensures that sufficient openness remains between Hatfield and the proposed village at Symondshyde and that, on balance, the contribution to the borough’s housing requirement justifies the impact on the Green Belt. This conclusion remains supported. The proposed number of dwellings supported at this site is increased slightly from 1130 to 1136 dwellings.
- 24.9 The only other site proposed for allocation in the wider rural areas is a small extension to an existing Gypsy and Traveller site located at Barbaraville. Whilst this site falls within a ‘very high’ harm parcel, the proposal is a small extension to an existing site that would be considered to have very limited impact on the Green Belt. Landscaping and site boundaries would also assist in minimising harm to the lowest reasonable extent.
- 24.10 On this basis, and following the detailed Stage 3 assessment, both of the Draft Local Plan 2016 proposals continue to be considered appropriate for allocation. These are shown by **Table 24.2**.

## **Stage 4 - Settlement Level Assessment**

24.11 The Stage 4 assessment provides a further level of assessment to ensure the Council's approach to site selection is comprehensive and to ensure that some of the evidence and appraisals are considered at a settlement level as well as on a site-by-site basis. This is particularly important to ensure a holistic and comprehensive approach is followed. Relevant evidence and appraisals include:

- Key Infrastructure Issues
- Strategic Advantages/ Disadvantages, and
- Green Belt Matters (exceptional circumstances and Green Belt boundaries)

24.12 There are clearly overlapping interests between key infrastructure requirements and strategic advantages and disadvantages and the level of growth at a settlement overall may impact on these factors. Similarly, consideration to impact on the Green Belt, such as demonstrating how Green Belt boundaries may need to be amended, also benefits from a settlement level analysis.

### **Key Infrastructure Issues**

24.13 The 2016 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. For the rural areas, the proposed new settlement at Symondshyde remains in 2019 as the only substantial new housing allocation. The following sub-sections provide an up-to-date position on the same range of infrastructure issues so as to understand any key constraints or opportunities, which may support, or constrain, levels of growth or the timing of delivery.

### **Secondary Schools**

24.14 The proposed new settlement at Symondshyde (SDS6 or Hat15) is located about 1km north-west of the site allocation at North-west Hatfield (SDS5 or Hat1). At a capacity of 1,136 dwellings, Symondshyde would generate the equivalent of 2.26FE, which could be accommodated within the new 8-10FE secondary school proposed for SDS5 (Hat1).

### ***Primary schools***

- 24.15 Hertfordshire County Council (HCC) as education authority considers it likely that the primary age pupil yield from the Symondshyde development could be accommodated within the new 2FE primary school proposed within the new settlement. Should there be insufficient room within this 2FE school for all children from the development, use could be made of the new primary capacity at SDS5 (Hat1).

### ***Highways***

- 24.16 It is recognised that the Symondshyde site is not currently well-served by the road network or other transport infrastructure. The proposed development of Symondshyde for housing would need to be accompanied by substantial investment in transport links. This would take the form of two new access roads, one from Green Lanes and one from Coopers Green Lane at the junction with Great Braitch Lane. These routes would also provide dedicated cycle and footpath links.
- 24.17 Highway improvements would also be sought, to include a capacity enhancement at the existing Green Lanes/Coopers Green Lane roundabout (one of the schemes specified in the schedule to the Infrastructure Delivery Plan (IDP)) and improved cycle and footpath routes along Coopers Green Lane itself. Development at Symondshyde at the scale proposed will also impact traffic congestion and waiting times at the Stanborough roundabouts (B653/A6129) either side of the A1 (M). Highway improvements at this location are also included in the IDP. Subject to the above measures, HCC as Highway Authority does not consider that the development of the site would have a severe effect on the operation of the highway network.
- 24.18 The settlement at Symondshyde will need to be served by a public transport option. This could take the form of a diversion of an existing bus route, a new subsidised route, or a demand-responsive bus service. Encouragement of modal shift to walking, cycling and public transport will be a very important factor in mitigating the cumulative traffic effects of development at SDS6 (Hat15) Symondshyde and SDS5 (Hat1) North-west Hatfield.

## ***Utilities***

- 24.19 The development of a new settlement at Symondshyde will require significant extension of capacity in existing utilities networks. In particular, a new waste water trunk sewer will be required in order to drain the development to Mill Green sewage treatment works (STW). This will effectively take the form of an extension to the new trunk sewer which will be required to drain later phases of the development site at North-west Hatfield (SDS5 or Hat1) to Mill Green. The combined increased load will also require capacity improvements at Mill Green STW which will be programmed by Thames Water. Because of this, Thames Water recommend a lead-in time of three to five years from any grant of planning permission to provide the necessary infrastructure.

## ***Strategic Advantages/Disadvantages***

- 24.20 The creation of a new village settlement (SDS6) provides an opportunity to facilitate bespoke design without significant constraint associated by existing development and to make provision for a new primary school, local shop and community building and formal and informal open space, thus creating a comprehensive master-planned approach to forming a new settlement. This clearly presents a significant strategic advantage.

## ***Green Belt Matters***

- 24.21 Following the Stage 3 assessment, two sites are proposed for allocation in the Draft Local Plan across the wider rural areas.
- 24.22 The site-by-site assessment (Stage 3) considers Green Belt impact in detail, including harm to Green Belt purposes and to the Green Belt as a whole, consideration to how releasing sites would relate to Green Belt boundaries and how the Calverton Test requirements (tests 4 and 5) are met. These detailed assessments are shown by **Appendix A**.
- 24.23 Consideration for exceptional circumstances and the other Calverton Tests (tests 1 to 3) are discussed more in **Section 6**, as these apply more generally to the Borough as a whole.



24.24 It is proposed that the new village settlement SDS6 (Hat15) is excluded (inset) from the Green Belt. As discussed, detailed consideration has been given to the level of impact and minimising harm. The allocation of the other site in the Rural Areas HS33 (GTLA008) will result in a limited 'inset' from the Green Belt and will be identified for traveller pitches only, consistent with the National Planning policy for Traveller Sites<sup>8</sup>. No further changes are proposed.

### ***Proportional Distribution***

24.25 The proportion of households located across the rural areas, i.e. not associated with any of the individual settlements is 2.5% of the borough, when considered as a whole, and based on the 2011 Census data. The proportion of the proposed allocations in the Draft Local Plan 2016 was 14.2%, reflecting the proposed new village settlement and thus the original Draft Local Plan 2016, was proposing a level of growth above that necessary to achieve a proportional distribution.

24.26 Where additional provision for housing is proposed within the emerging local plan, it is inevitable that the proportion of the distribution by settlement area will change. However, as the level of growth is increasing elsewhere across the district, mainly at the larger villages, the result of the sites proposed in this paper, the proportion at the rural areas actually goes down to 9.6%. Clearly this is closer to a level of growth necessary to meet a proportional distribution and reflect the proposal for the creation of a new settlement.

24.27 How this relates to the change in distribution across the borough as a whole is discussed in more detail in **Section 25**.

### **Conclusions**

24.28 There are only two sites considered in this section, a small expansion to an existing Gypsy and Traveller site and the creation of a new standalone village settlement. This is because all other sites promoted in the Rural Areas would not assist in directing growth towards the most sustainable locations.

24.29 The justification for inclusion of a new village settlement has been established to inform the Draft Local Plan 2016 and this continues to be supported. It provides an opportunity to plan for a significant level of housing, helping to ensure the borough's housing requirement is met in full, in a sustainable way and to minimise impact on the Green Belt.

---

<sup>8</sup> MHCLG (2015) Planning policy for traveller sites 2015. Policy E, Paragraphs 16 and 17.

24.30 **Table 24.3** lists those sites recommended for allocation in the Local Plan across the wider rural areas.

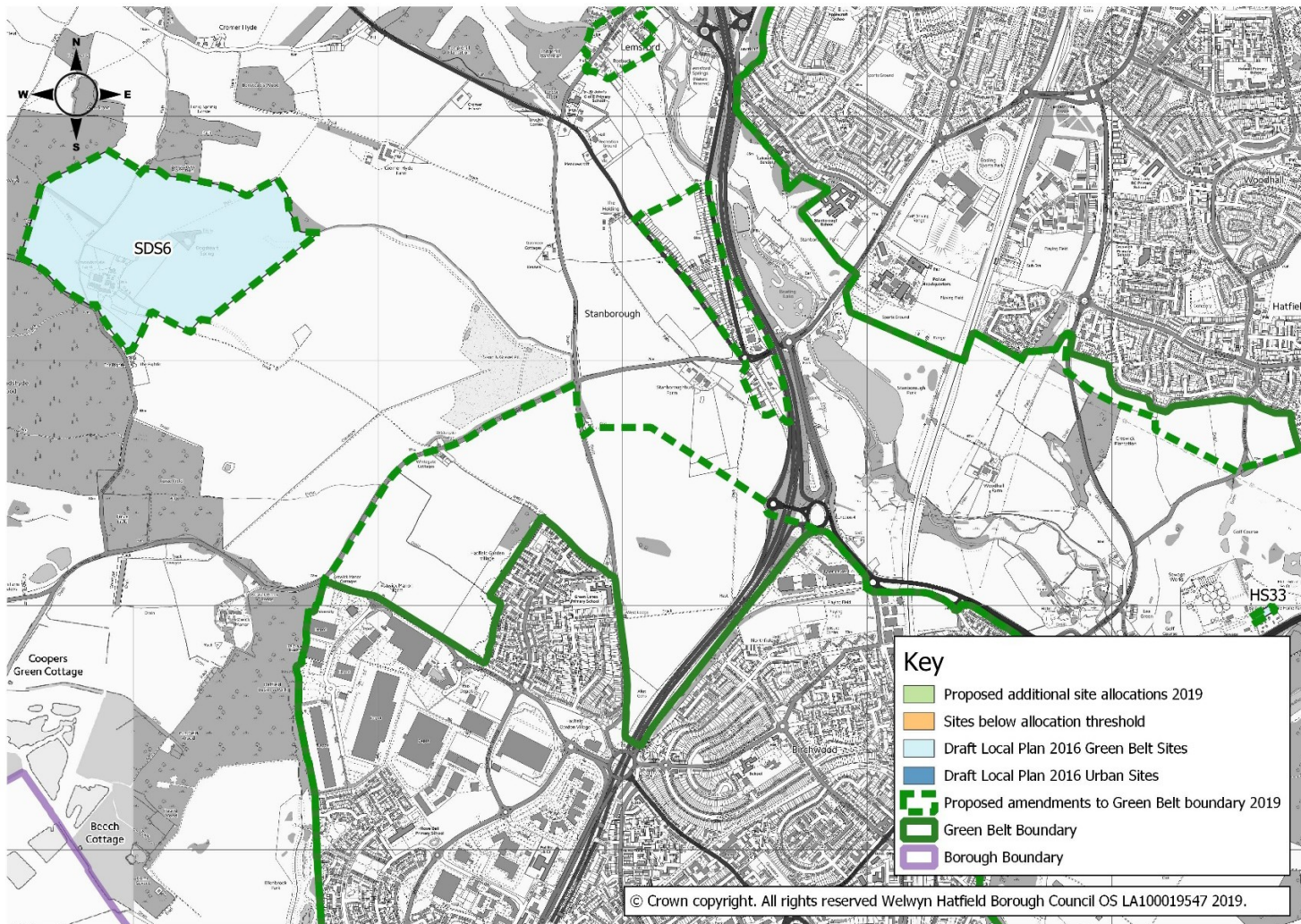
**Table 24.3: Sites proposed for allocation in the emerging Local Plan across the Rural Areas as updated in 2019.**

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
SDS6	Hat15	Symondshyde – new village	Green Belt	1,136
HS33	GTLAA08	Barbaraville, Mill Green	Green Belt	4 pitches
<b>Total</b>				<b>1,136 dwellings + 4 pitches</b>

**24.31** A settlement map has been prepared to illustrate the proposed change to the Green Belt boundary as a result of the proposed sites for allocation. These are shown by **Figure 24.1**.

24.32 A map of Rural Areas has been prepared to illustrate the sites considered for potential allocation at this settlement. This can be found at **Appendix B**.

**Figure 24.1: Proposed change to Green Belt boundary within the Rural Areas to inform the emerging WHBC Local Plan as updated in 2019.**



## 25. Distribution of Growth

- 25.1 In the 2016 Housing Site Selection background paper, an illustration was provided of the objectively assessed need (OAN) distributed on a proportionate basis to the boroughs main towns, and excluded villages. A slightly different approach has been taken in this paper (i.e. the 2019 Sites Selection Paper), as explained in the following section.
- 25.2 The table over-page (**Table 25.1**) illustrates the level of growth proposed in the Draft Local Plan 2016 (as submitted) compared to the revised position in 2019, arising from the recommendations set out in this paper. These figures are also compared to the proportion of households in the borough's towns and excluded (inset) villages, together with a number of villages which are currently washed over by the Green Belt, as based on the 2011 Census data. The remainder of the borough, outside all of the settlements has been referred to as the rural areas<sup>1</sup>.
- 25.3 A further table (**Table 25.2**) illustrates how these changes in the proportional distribution, compare for the categories of settlements, as set out in the Settlement Hierarchy (Policy SP3: Settlement Hierarchy) as included in the Draft Local Plan 2016.
- 25.4 Overall, it is clear that by far the greatest change between the Draft Local Plan 2016 and the proposed changes in 2019, are the increased proportions of development being proposed for allocation at the large excluded (inset) villages. The proportion of growth directed to the two main towns of Welwyn Garden City and Hatfield continues to be by far the largest proportion and the level of growth directed to the smaller settlements continues to be comparatively small.
- 25.5 In fact, the proportion of growth at the three lowest tier of settlements (small excluded villages and settlements; Green Belt villages; and the small Green Belt villages and settlements) is actually closer to the proportion of household across the Borough based on the 2011 Census with the 2019 proposed changes to the plan, compared to the 2016 plan.
- 25.6 It is inevitable that the proportion of growth changes as a result of increasing the proposed supply of housing as set out in this paper. However, ensuring that the two main towns continue as the main focus of growth, still over 66%, with the next most sustainable settlements, i.e. the large excluded (inset) villages, being the main focus of the additional growth, acts as an illustration of the relative sustainability of the 2019 proposed plan changes.

---

<sup>1</sup> Noting that the council's consultation in 2019 on sites promoted through the Call for Sites 2019 split the borough's rural areas into Rural North and Rural South.

**Table 25.1: Distribution of proposed growth in the Draft Local Plan 2016 compared to the updated 2019 proposed allocations and by the proportion of households based on the 2011 Census data, by settlements.**

Settlement	Proportion of Households (2011 Census)	Draft Local Plan 2016 - Proportion of Total Allocations	2019 Proposed Allocations - Proportion of Total Allocations
	%		
Welwyn Garden City	44.7	46.6	45.5
Hatfield	30.4	26.1	21.6
Woolmer Green	1.3	1.9	1.8
Oaklands and Mardley Heath	2.7	0.4	0.3
Welwyn	3.4	0.8	2.6
Digswell	1.4	0.0	0.0
Lemsford	0.2	0.0	0.2
Stanborough	0.3	0.0	0.9
Essendon	0.6	0.0	0.0
Welham Green	2.9	1.1	5.0
Bell Bar	0.3	0.0	0.9
Brookmans Park	3.0	3.4	6.3
Swanley Bar	0.3	0.0	0.0
Little Heath	1.0	1.7	1.4
Newgate Street	0.4	0.0	0.0
Cuffley	4.0	3.7	4.1
Northaw	0.5	0.0	0.0
Rural Areas	2.5	14.2	9.6

**Table 25.2: Distribution of proposed growth in the Draft Local Plan 2016 compared to the updated 2019 proposed allocations and by the proportion of households based on the 2011 Census data, by settlement type.**

Classification from Settlement Hierarchy	Settlements	Proportion of Households (2011 Census)	Draft Local Plan 2016 - Proportion of Total Allocations	2019 Proposed Allocations - Proportion of Total Allocations
		%		
Main Town	Welwyn Garden City	44.7	46.6	45.5
Town	Hatfield	30.4	26.1	21.6
Large excluded villages	Welwyn, Welham Green, Brookmans Park, Cuffley	13.4	9.1	17.9
Small excluded villages and settlement	Woolmer Green, Oaklands & Mardley Heath, Digswell, Little Heath, Symondshyde	6.5	18.0	13.0
Green Belt villages	Lemsford, Essendon, Newgate Street, Northaw	1.7	0.0	0.2
Small Green Belt villages and settlement	Ayot St Lawrence, Ayot St Peter, Ayot Green, Burnham Green, Stanborough, Mill Green, Bullens Green, Wild Hill, Woodside, Bell Bar, Water End, Swanley Bar	3.3	0.2	1.8

## **26. Strategic Options**

- 26.1 The Council has followed a comprehensive approach to assessing additional sites, as set out by this Topic Paper, in seeking to meet the Objectively Assessed Need (OAN) for housing in full for the revised plan period 2016 to 2036, which is 16,000 dwellings. The process of updating the OAN for the borough is discussed in more detail in Section 4 of this paper.
- 26.2 Consideration has also been given to balancing the level of employment to make provision for during the same plan period and it is assumed that an additional 11 hectares is required for an amended plan period of 2016 to 2036. This level of employment land supply will ensure the lower of two employment growth scenarios considered will be adequately provided for, which is referred to as the 'population' growth scenario. This scenario is referred to within the technical evidence as the 'minimum' amount required to maintain a balance between population and employment growth, and to ensure that housing and population growth do not result in unsustainable levels of out-commuting. The appropriate level of employment for the Council to plan for up to 2036 is discussed in more detail in Section 5 of this paper.
- 26.3 These updated housing need and employment requirement figures provide a baseline for the level of growth that should be planned for in the borough up to 2036.
- 26.4 However, the level of growth to plan for requires consideration of a range of factors and the need to balance how these factors interact. For example, planning for a higher level of housing, might require more employment sites to be released for housing, which has the knock-on effect of reducing the level of employment available in the district, or releasing more land from the Green Belt, which may lead to a higher level of harm to the Green Belt.
- 26.5 Alternative 'strategic' options have been considered, to ensure the Local Plan makes the most appropriate proposals overall and these options have also been considered by the Sustainability Appraisal.
- 26.6 The Strategic Options are considered as 'reasonable alternatives' in relation to the amount of housing and employment land to be provided in the Plan (Policy SP2) and subject to high-level appraisal against the SA objectives. They have been identified to test the effects of a range of options for housing and employment land delivery against the SA objectives, which is an approach in line with the SEA Regulations (2004) to assess reasonable alternatives to the plan, which is reflected in the Planning Practice Guidance.

### ***Option 1 – Preferred Option***

- 26.7 The process described by this Topic Paper has assessed **144** additional sites as well as re-assessing sites included in the original Local Plan as submitted in May 2017. This process has led to **78** sites being considered appropriate for allocation, including **36** additional sites, following the stages of the site selection process. These stages have considered a wide range of factors in detail, as described in Sections 7, 8 and 9 of this Topic Paper and would result in **15,952** homes being provided up to 2036.
- 26.8 To deliver **15,952** dwellings relies on releasing additional sites from the Green Belt, albeit, avoiding any additional sites that fall within ‘high’ or ‘very high’ harm parcels, as identified by the Green Belt study and the allocation of five sites promoted for housing and located within existing or proposed employment areas, including 4 sites (Pea97, Pea102, Pea105 and Pea106) currently in a B class use, that could otherwise help to provide for employment related land uses. Despite this, it is still **48 dwellings** short of meeting the full OAN and would fall approximately **1.63 hectares** short of meeting the employment requirement, i.e. the lower of the two scenarios considered, which is referred to as the ‘population’ growth scenario.
- 26.9 This option is considered to be the closest possible to meeting the housing and employment requirement figures (16,000 dwellings and 12 hectares) without needing to release additional sites that would cause ‘high’ harm to the Green Belt and following the detailed consideration undertaken in stages one to four of the site selection process. This assumes the exclusion of any sites that are not deemed to be deliverable, or appropriate for a variety of reasons as discussed in the preceding sections of this paper. This approach is referred to **as Option 1 (Table 26.1)**.
- 26.10 The Sustainability Appraisal considered that Option 1 would result in a much smaller housing shortfall, and whilst protecting employment sites that meet the needs of businesses, would also release other employment sites for housing in sustainable locations. Option 1 would therefore be closer to meeting the borough’s need for housing, which would deliver associated social and economic benefits. Whilst all options would result in likely environmental effects, the mitigation provided by local plan policies, careful master-planning and delivery of necessary infrastructure would help to minimise these impacts.



### ***Option 2 – Avoid High harm to the Green Belt***

- 26.11 The first alternative option considered (referred to as Option 2) is the same as Option 1, being that it includes all the additional sites that have been identified following the detailed assessment process, but excludes those sites already included in the Local Plan as submitted in May 2017 that fall within 'high' harm Green Belt parcels. Of the sites already set out in the Local Plan as submitted in May 2017, five (SDS5, HS22, HS24, HS29 and HS30) fell (partly or wholly) within 'high' harm parcels. This option would deliver **14,958 dwellings** (an under provision of 1,042 dwellings) and would still fall 1.63 hectares short of the employment requirement as the same sites would be released from employment for housing as Option 1 (**Table 26.1**).
- 26.12 Option 2 would reduce any harm to the Green Belt by ensuring that no sites were proposed that fall within any 'high' harm parcels. However, this option would fall significantly below the identified housing requirement (1,042 dwellings under provision). This option would reduce the scale of development at SDS1 (Hat1/13) from 1,750 dwellings to 1,304 dwellings, but would also reduce the potential for this site to accommodate new infrastructure including a new school, playing pitches and open space. The removal of four other sites from the Local Plan would not only reduce the contribution to the borough housing requirement, including reducing the provision of affordable housing, but also reduce the developer contribution towards infrastructure at Brookmans Park (HS22 – BrP4), Little Heath (HS24 – BrP7) and Cuffley (HS29 and HS30 – Cuf12 and Cuf7). The reduction of housing at SDS1 (Hat1/13) would also affect the distribution of the proposed housing at the borough's main settlements, which are the most sustainable locations for development, that offer the greatest level of services and facilities within the borough.
- 26.13 The Sustainability Appraisal considered that Option 2 would perform less well than the other options in relation to providing the right amount of homes to meet local needs, including affordable housing or homes for older people, with a significant reduction in housing on one of the strategic sites, fewer sites in larger villages and less contributions towards delivering supporting infrastructure. There would also be less beneficial effects associated with supporting training and apprenticeships as well as providing less well for access to education and learning for new residents.
- 26.14 Overall, it is considered that providing for the majority of housing at the main towns, planning for appropriate strategic infrastructure and more closely meeting the Objectively Assessed Need outweighs the potential benefits of removing the allocation of the sites falling within 'high' harm Green Belt parcels that formed part of the original Draft Local Plan 2016. It should be

noted that Option 1 does not add any further sites that fall within 'high' harm parcels.

### ***Option 3 – Protect employment sites***

- 26.15 The next alternative option considered (referred to as Option 3) is the same as Option 1, being that it includes all the additional sites that have been identified following the detailed assessment process, but retains five sites for employment use (Pea97, Pea102, Pea105, Pea106 and WE100) rather than releasing them for housing as would be the case in Options 1 or 2. This option provides for less housing than Option 1 (**15,361 dwellings** vs. 15,952 – an under provision of 639 dwellings against the full OAN). The retention of the employment sites results in **a shortfall of 0.80** hectares of employment land, rather than a shortfall of 1.63 hectares as is the case for Option 1.
- 26.16 As explained through the detailed assessment conducted on a site-by-site and settlement basis, these are the only employment sites considered to have potential for allocation for housing in an effort to ensure the borough's housing requirement is met in full or retention for employment, as considered by Option 3.
- 26.17 Balancing the provision of housing and employment is an important consideration, but even Option 3, that retains additional land in employment use, still falls short of the 'population' growth scenario that has already been described as the 'minimum' level of employment growth to plan for with a shortfall of 0.80 hectares.
- 26.18 The Sustainability Appraisal considered that Option 3 would score well in relation to the provision of sufficient sites to meet the needs of businesses to foster employment growth and generally perform well in relation to those objectives associated with housing provision, such as providing the right amount of housing to meet local needs, including affordable housing, supporting the delivery of associated infrastructure and for supporting training and apprenticeships associated with new development. The lower level of housing associated with Option 3 leads to slightly reduced impacts on open space, landscape character and local distinctiveness, the historic environment, biodiversity and geodiversity.
- 26.19 Overall, it is considered that more closely meeting the housing requirement (as in Option 1), and achieving the majority of the employment requirement (Option 1 is 1.63 hectares short of the requirement) outweighs the small benefit provided by Option 3 in reducing the employment shortfall (0.80 hectares short for Option 3). The loss of housing associated with Option 3 does not outweigh the small increase in employment. Neither Option 1 nor

Option 3 would rely on any additional 'high' harm Green Belt sites being allocated other than those already included in the Local Plan, as submitted, in May 2017, and discussed under Option 2.

#### ***Option 4 – High Harm to the Green Belt***

- 26.20 The final option considered (referred to as Option 4) would include all the additional 'high' and 'very high' harm Green Belt sites that otherwise would pass the site selection process, if it were not for the level of harm their release would have on the Green Belt. There are 17 additional sites that fall into this category (NS1, StL3, Cuf5, Cuf12a, Cuf10, Cuf11, Wel16, BrP6, LHe3, NS2, BrP5, NS3 (a, b, c), SB1 (a, b), WGr7 (& a), StL16, Wel14b, Nor13 (& a). Where sites comprise multiple site scenarios, the highest (or equivalent) potential capacity has been used to illustrate the maximum number of dwellings that could be accommodated on the site and to avoid any double counting. This option would provide for **17,827** dwellings (**Table 26.1**). This would represent an over-supply of 1, 827 dwellings.
- 26.21 However, the additional sites considered by Option 4 have all been assessed on a site-by-site basis and the level of harm to the Green Belt is not thought to justify their allocation. Theoretically, a small number of these sites could be added to Option 1 to ensure the housing requirement was met in full (16,000 rather than 15,952 dwellings). However, it is not considered that the release of a small site (for example for 20 dwellings) from the Green Belt that would lead to 'high' harm to the Green Belt is justified, or that exceptional circumstances would exist, especially for such a small additional level of development. This conclusion is reached following detailed site-by-site assessment as summarised in **Appendix A** and the settlement sections of this Topic Paper (Sections 10 to 24).
- 26.22 The Sustainability Appraisal considered that Option 4 would have greater social and economic benefits in terms of housing provision and more flexible employment development, but proportionally greater negative effects in terms of the environmental impacts of development. Planning for significantly more homes without some increase in employment provision could lead to an imbalance of out-commuting. Whilst there may be positive effects associated with sustaining rural communities and business, there may also be more negative effects on rural character.
- 26.23 On this basis, Option 4 is not considered appropriate, as it would result in significant harm to the Green Belt. It is not considered that exceptional circumstances exist to add a selection of the additional sites included in Option 4 to increase the level of housing provided for by Option 1, as Option 1 is only 48 dwellings short of the full OAN without the need to allocate any

additional sites falling within 'high' harm parcels. These additional sites have been considered in detail and on a site-by-site basis. Finally, and on balance, it is not considered that there are exceptional circumstances to justify a significant over-allocation.

**Table 26.1: High Level Summary of Strategic Options considered to inform WHBC emerging Local Plan**

Option	Number of Dwellings	Amount of Employment	Description	Notes
1	15,952 (48 under provision)	1.63ha (under provision)	<p><b>The Preferred Strategy:</b> 78 sites in total.</p> <p>Includes all sites from the Draft Local Plan 2016 plus 36 additional sites*. No additional sites fall within 'high' harm Green Belt parcels, except one site (WeG17 at Welham Green) that is proposed for a new school (less Green Belt impact than residential).</p> <p>This option is consistent with the Settlement Hierarchy and Spatial Strategy.</p>	Closest to OAN without increasing Green Belt Harm. Achieves a balance between the need for housing and employment growth.
2	14,958 (1,042 under provision)	1.63ha (under provision)	<p><b>Avoid High harm sites:</b> 73 sites in total.</p> <p>As Option 1 less x5 Draft Local Plan 2016 sites that fall within 'high' harm Green Belt parcels (SDS1, HS22, HS24, HS29 and HS30). This option would reduce any impact on the Green Belt, but would deliver significantly less housing than the identified OAN.</p> <p>Less consistent with Settlement Hierarchy and Spatial Strategy.</p>	Not preferred. Significant under provision of housing
3	15,361 (639 under provision)	0.8ha (under provision)	<p><b>Protect employment land:</b> 73 sites in total.</p> <p>As Option 1 less x5 Employment Sites that are retained in this option for employment (WE100, Pea97, Pea105, Pea106 and Pea102). In Option 1 these sites would be released for housing. This option slightly reduces the shortfall in employment, but increases the shortfall in meeting the OAN for housing.</p> <p>Broadly consistent with the Settlement Hierarchy and Spatial Strategy.</p>	Not Preferred. Protection of a limited amount of employment land not justify a reduction in housing provision.
4	17,827 (1,827 over provision)	1.63ha (under provision)	<p><b>High harm to the Green Belt:</b> 95 sites in total.</p> <p>As Option 1 plus 17 additional sites that pass the site selection process and were excluded only because they fall into 'high' harm Green Belt parcels. This option delivers significantly more housing but would lead to much greater impact on the Green Belt. The additional sites are (NS1, NS2, NS3c, StL3, StL16, Cuf5, Cuf10, Cuf11, Cuf12a, Wel14b, Wel16, BrP5, BrP6, LHe3, SB1, WGr7 and Nor13).</p> <p>This option is less consistent with the Settlement Hierarchy and Spatial Strategy.</p>	Not Preferred. Exceptional circumstances not justified for over-providing housing at expense of 'high' harm to Green Belt.

\*The Draft Local Plan 2016 Site HS7 (Land at Waterside Welwyn Garden City) is removed to reflect a proposed modification.

## 27. Conclusions

- 27.1 The WHBC Local Plan was submitted to the Secretary of State in May 2017. An independent Planning Inspector, Melvyn Middleton, was appointed to preside over the local Plan Examination.
- 27.2 During the Examination process, the Inspector has made it clear that the Plan as submitted, did not meet the identified need for housing, that the Council's proposals for employment should be related to the accompanying housing proposals and that 'exceptional circumstances' would need to be demonstrated before any site allocations could be found to be sound.
- 27.3 The Council has updated its evidence concerning the level of Housing and Employment that should be planned for in the borough. This concludes that an annual housing requirement of 800 dwellings is appropriate that would equate to a **Full Objectively Assessed Need for 16,000 dwellings for the updated plan period of 2016 to 2036**. The Planning Inspector has confirmed in his Advice Note (December 2019) that a Full Objectively Assessed Need of 800 dwellings per year for the duration of the plan period and that the revised 2016 to 2036 plan period is **JUSTIFIED**.
- 27.4 The updated evidence for employment requirements for the borough confirm that around 11 additional hectares are necessary to meet what is considered to be the minimum level of additional employment to ensure a balance between housing and employment growth is achieved. This equates to around 2,400 jobs. The Planning Inspector has confirmed in his Advice Note (December 2019) that the Council's methodology to produce these revised employment supply and need forecasts is also **JUSTIFIED**.
- 27.5 Furthermore, the Planning Inspector has stated in his Advice Note (December 2019) that:
- "Unless there are sound planning reasons for not doing so, in the first instance, the totality of all of the dwellings assumed to be built during the plan period, on sites put forward in the adopted plan, must be capable of meeting, as a minimum, the Full Objectively Assessed Need for at least the plan period" and,*
- "A satisfactory housing delivery trajectory that clearly demonstrates that the sites proposed for development, when considered as a whole, will be capable of maintaining a five-year supply of housing land throughout the plan period, should be submitted".*
- 27.6 The Council has followed a comprehensive approach to identifying additional sites for inclusion in the emerging WHBC Local Plan. This follows a call-for-sites consultation conducted in May 2019 and has been informed by a detailed suite of evidence. These have included:

- Housing and Economic Land Availability Assessment (HELAA)
- The Green Belt Study (Parts 1, 2 and 3)
- An appraisal of Green Belt Boundaries
- Consideration for the Calverton Test (this relates to demonstrating 'exceptional circumstances' for releasing sites from the Green Belt)
- Sustainability Appraisal (SA)
- Habitats Regulations Assessment (HRA)
- Strategic Flood Risk Assessment (SFRA)
- Landscape Sensitivity Study
- Transport Assessment
- An appraisal of strategic advantages and disadvantages
- Strategic infrastructure and cumulative impacts

27.7 The Site Selection process has tested 144 additional sites, along with re-assessing some of the Local Plan sites set out in the original draft plan as submitted. A comprehensive approach has been followed, both on a site-by-site and settlement basis. In all 78 sites were identified as appropriate for allocation that form the Councils updated 'Preferred Option'.

27.8 The Preferred Option ensures that all sites that pass the Site Selection process are recommended for allocation, where they do not lead to any additional 'high' harm to the Green Belt. This option will deliver 15,952 dwellings (i.e. only 48 dwellings short of the Full Objectively Assessed Need) and would be 1.63 hectares short of meeting the additional employment requirement of 11 hectares

27.9 Four 'strategic options' were identified to test the Preferred Option and to help ensure it is appropriate. The alternative options consisted of:

**Option 2:** Avoid High Harm to the Green Belt (14,958 dwellings):

This option reduces harm to the Green Belt by removing the five sites included in the original plan as submitted that would lead to high harm to the Green Belt.

**Option 3: Protect Employment Sites (15,361 dwellings):**

This option would retain five employment sites for employment. In the Preferred Option they are released for housing. This slightly reduces the shortfall in employment to 0.8 hectares.

**Option 4: High Harm to the Green Belt (17,827 dwellings):**

This option supports the delivery of more housing by adding 17 additional sites that otherwise pass the Sites Selection Process but that would lead to high harm to the Green Belt.

- 27.10 Overall, it is considered that the Preferred Option is appropriate. There are only five sites (i.e. out of 78) that would lead to high harm to the Green Belt, but these were already proposed in the original Local Plan, as submitted, are located at the most sustainable settlements within the borough and help to support the delivery of strategic infrastructure.
- 27.11 The Preferred Option releases five employment sites for housing, compared to retaining them in Option 3, this helps to deliver more housing in the most sustainable locations within the borough and meets the majority of the identified employment need.
- 27.12 Planning for a higher level of housing, as with Option 4, is not considered to be justified. It is not considered that there are 'exceptional circumstances' to release additional sites that would lead to additional high harm to the Green Belt where Option 1 almost meets the Objectively Assessed Need in Full.
- 27.13 A 'stepped trajectory' is proposed with the annual housing delivery increasing during the plan period. This approach is consistent with national planning guidance. This approach ensures that the Preferred Option would achieve 6.1 years land supply at the point of plan adoption and achieving 98 % in the Housing Delivery Test.
- 27.14 The Preferred Option is consistent with the Council's Settlement Hierarchy and Spatial Strategy. The majority, more than 66% would be directed to the boroughs two main settlements and only 2% would be directed to the lowest two tiers of settlements (Green Belt Villages and Small Green Belt Villages). Other development is directed to the next most sustainable settlements and locations within the borough, namely the Large Excluded Villages.
- 27.15 Table 27.1 provides a summary of the Preferred Option for the borough as a whole. Table 27.1 provides a summary of all sites proposed for allocation on a settlement by settlement basis.



**Table 27.1: Summary of WHBC Emerging Local Plan Proposed Sites**

Settlement Type (& Settlement Hierarchy Tier)	Settlement	2016 Sites		2019 Additional Sites		Total Proposed Sites	
		Number of sites	Number of dwellings	Number of sites	Number of dwellings	Number of sites	Number of dwellings
Main Town (Tier 1)	Welwyn Garden City	13	3,738	9	1,679	21	5,417
Town (Tier 2)	Hatfield	8	2,097	5	475	13	2,572
Large Excluded Village (Tier 3)	Welwyn	3	67	4	248	7	315
	Welham Green	2	92	8	500	9	592
	Bell Bar and Brookmans Park	3	274	3	579	6	853
	Cuffley	6	299	1	186	7	485
Small Excluded Village/Settlement (Tier 4)	Symondshyde	1	1,130	0	6	1	1,136
	Woolmer Green	1	150	2	59	3	209
	Oaklands & Mardley Heath	3	31	0	0	3	31
	Little Heath	2	135	1	36	3	171
Green Belt Village (Tier 5)	Lemsford	0	0	1	27	1	27
Small Green Belt Village/Settlement (Tier 6)	Stanborough	0	0	3	103	3	103
	Rural areas	2	14	0	-10	1	4
<b>Totals</b>		<b>42</b>	<b>8,027</b>	<b>36</b>	<b>3,888</b>	<b>78</b>	<b>11,915</b>
<b>Updated Completions, Commitments, Windfall Allowance and Small Sites Allowance</b>							<b>4,037</b>
<b>Total Proposed Supply (2016 to 2036)</b>							<b>15,952</b>

**Table 27.2: Summary of all ‘preferred options’ sites for proposed inclusion in the emerging WHBC Local Plan**

**Welwyn Garden City**

<b>DLP 2016 (Site Ref)</b>	<b>HELAA 2019 (Site ref)</b>	<b>Settlement</b>	<b>Location</b>	<b>Proposed 2016/2019</b>	<b>Urban / Green Belt</b>	<b>GB Harm</b>	<b>Delivery within plan period</b>	<b>Number of dwellings</b>
SDS1	WGC4/7	Welwyn Garden City	Panshanger	2016	ASR	Moderate High	0-10 years	650
SDS2	WGC5	Welwyn Garden City	Land SE of WGC	2016	Green Belt	Moderate High	0-15 years	1,300
SDS3	Pea02b	Welwyn Garden City	Broadwater Road SPD Site (north)	2016	Urban	N/A	0-5/6-10 years	1,403
SDS4	Pea02c	Welwyn Garden City	Broadwater Road SPD Site (west)	2016	Urban	N/A	11-15 years	171
HS1	Pan01b	Welwyn Garden City	Land at Bericot Way	2016	Urban	N/A	0-5 years	21
HS2	WGC1	Welwyn Garden City	Creswick	2016	Green Belt	Moderate High	0-10 years	300
HS3	Pea08	Welwyn Garden City	80 Bridge Road East	2016	Urban	N/A	0-5 years/6-10 years	32
HS4	Hal03	Welwyn Garden City	Ratcliff Tail Lift Site	2016	Urban	N/A	6-10 years	110
HS5	Hol19	Welwyn Garden City	Hyde Valley House, Hyde Valley	2016	Urban	N/A	6-10 years	17
MUS1	Han40	Welwyn Garden City	Town centre North Development Site	2016	Urban	N/A	6-10 years	100

Welwyn Garden City continued

<b>DLP 2016 (Site Ref)</b>	<b>HELAA 2019 (Site ref)</b>	<b>Settlement</b>	<b>Location</b>	<b>Proposed 2016/2019</b>	<b>Urban / Green Belt</b>	<b>GB Harm</b>	<b>Delivery within plan period</b>	<b>Number of dwellings</b>
HS6	Han91	Welwyn Garden City	Land at Gosling Sports Park	2016	Urban	N/A	6-10 years	250
HS8	Pea24	Welwyn Garden City	St Michael's House, Holwell Road	2016	Urban	N/A	11-15 years	22
N/A	Han40a	Welwyn Garden City	Campus East car park	<b>2019</b>	Urban	N/A	1-10 years	250
N/A	Hol23	Welwyn Garden City	Hollybush Lane	<b>2019</b>	Urban	N/A	11-15 years	16
N/A	Pea97	Welwyn Garden City	Former Norton Building	<b>2019</b>	Urban	N/A	1-5 years	122
N/A	Pea102	Welwyn Garden City	Bio-Park, Broadwater Road	<b>2019</b>	Urban	N/A	6-10 years	179
N/A	Pea103	Welwyn Garden City	29 Broadwater Road	<b>2019</b>	Urban	N/A	1-5 years	128
N/A	Pea104	Welwyn Garden City Welwyn Garden City	YMCA, 90 Peartree Lane	<b>2019</b>	Urban	N/A	1-5 years	15
N/A	Pea105	Welwyn Garden City	61 Bridge Road	<b>2019</b>	Urban	N/A	1-5 years	21
N/A	Pea106	Welwyn Garden City	73-83 Bridge Road East	<b>2019</b>	Urban	N/A	1-5 years	235
N/A	WGC4a	Welwyn Garden City	Land North East of Welwyn Garden City	<b>2019</b>	Green Belt	Moderate High	6-10 years	75

## Hatfield

DLP 2016 (Site Ref)	HELA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
SDS5	Hat1/Hat13	Hatfield	North West Hatfield	2016	Green Belt	High	6-10/11-15 years	1,750
MUS2	HC100b	Hatfield	1-9 Town Centre	2016	Urban	N/A	0-5 years	71
MUS3	HW100	Hatfield	High View (Hilltop) SPD Site	2016	Urban	N/A	6-10 years	146
HS9	HE80	Hatfield	Onslow St Audreys School, Howe Dell	2016	Urban	N/A	0-5 years	86
HS10	HS31	Hatfield	Garages at Hollyfield	2016	Urban	N/A	0-5 years	13
HS11	Hat11	Hatfield	Land at South Way	2016	Green Belt	Moderate High	0-10 years	120
HS13	HS91	Hatfield	Land south of Filbert Close	2016	Urban	N/A	6-10 years	37
HS14	HE23	Hatfield	L Kahn Manufacturing, Wellfield Road	2016	Urban	N/A	6-10/11-15 years	62
N/A	HC08	Hatfield	Lemsford Road	<b>2019</b>	Urban	N/A	6-10 years	32
N/A	HC11	Hatfield	Meridian House	<b>2019</b>	Urban	N/A	1-5 years	11
N/A	HE17	Hatfield	Link Drive car park and skate park	<b>2019</b>	Urban	N/A	1-5 years	80
N/A	HSW92	Hatfield	Minster Close	<b>2019</b>	Urban	N/A	1-5 years	49
N/A	HSW94	Hatfield	College Lane (north)	<b>2019</b>	Urban	N/A	6-10 years	115

### Woolmer Green

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
HS15	WGr1	Woolmer Green	Land east of London Road	2016	Green Belt	Moderate High	1-5/ 6-10 years	150
N/A	WE100	Woolmer Green	51-53 London Road, Knebworth	<b>2019</b>	Urban	N/A	0-5 Years	34
N/A	WGr3	Woolmer Green	Land at 52 London Road	<b>2019</b>	Green Belt	Moderate	1-5/ 6-10 years	25

### Oaklands and Mardley Heath

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
HS17	OMH5	Oaklands & Mardley Heath	Land rear of 2-12 Great North Road	2016	Green Belt	Moderate Low	6-10 years	20
HS32	GTLAA04	Oaklands & Mardley Heath	Four Oaks, Great North Road	2016	Green Belt	Moderate Low	0-5 years	6
HS16	OMH8	Oaklands & Mardley Heath	2 Great North Road	2016	Green Belt	Moderate Low	1-5 years	5

## Welwyn

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
HS20	Wel3	Welwyn	School Lane	2016	Green Belt	Moderate High	1-5 years	9
HS19	Wel4	Welwyn	Sandyhurst	2016	Green Belt	Moderate Low	1-5 years	30
HS18	Wel11	Welwyn	The Vineyards	2016	Green Belt	Moderate	1-5 years	30
N/A	Wel1	Welwyn	Land at Kimpton Road	<b>2019</b>	Green Belt	Moderate High	6-10 years	178
N/A	Wel2	Welwyn	Land adjoining Welwyn Cemetery	<b>2019</b>	Green Belt	Moderate High	6-10 years	40
N/A	Wel6	Welwyn	Land at Kimpton Road	<b>2019</b>	Green Belt	Moderate High	6-15 years	14
N/A	Wel15	Welwyn	Land at Fulling Mill Lane	<b>2019</b>	Green Belt	Moderate High	1-10 years	14

## Lemsford

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
N/A	StL13	Lemsford	Land at Roebuck Farm	<b>2019</b>	Green Belt	Moderate	1-5 years	27

### Stanborough

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
N/A	StL1	Stanborough	Land to the north of New Road	<b>2019</b>	Green Belt	Moderate	1-5 years	90
N/A	StL15	Stanborough	Land to the east of Great North Road	<b>2019</b>	Green Belt	Moderate	6-10 years	8
N/A	StL17	Stanborough	Land at Great North Road	<b>2019</b>	Green Belt	Moderate Low	1-5 years	5

### Rural North

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
SDS6	Hat15	Rural North	Symondshyde – new village	2016	Green Belt	Moderate High	5-15 years	1,136
HS33	GTAA08	Rural North	Barbaraville, Mill Green	2016	Green Belt	Very High	1-10 years	4

## Welham Green

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
HS25	GTLAA01	Welham Green	Foxes Lane, Dixons Hill Road	2016	Green Belt	Moderate Low	1-5 years	12
SDS7	WeG4b	Welham Green	Marshmoor	2016	Green Belt	Moderate High	1-10 years	80
N/A	WeG1	Welham Green	Units 1-3, 51 Welham Manor	<b>2019</b>	Green Belt	Low	1-5 years	16
N/A	WeG3a	Welham Green	Land at Welham Manor and west of Station Road	<b>2019</b>	Green Belt	Moderate	1-5 years	68
N/A	WeG6	Welham Green	Skimpans Farm	<b>2019</b>	Green Belt	Moderate	1-5 years	73
N/A	WeG10	Welham Green	Land at Dixons Hill Road	<b>2019</b>	Green Belt	Moderate	1-5 years	120
N/A	WeG12	Welham Green	Land north of Pooleys Lane	<b>2019</b>	Green Belt	Moderate	1-5 years	83
N/A	WeG15	Welham Green	Land at Potterells Farm	<b>2019</b>	Green Belt	Moderate high	1-10 years	140
N/A	WeG17	Welham Green	Land south of Dixons Hill Road	<b>2019</b>	Green Belt	High	1-10 years	1-2 FE Primary School



### Bell Bar and Brookmans Park

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
HS21	BrP13	Bell Bar and Brookmans Park	Land west of Golf Club Road	2016	Green Belt	Moderate High	0-5 years	14
HS22	BrP4	Bell Bar and Brookmans Park	Land west of Brookmans Park Railway Station	2016	Green Belt	High	0-10 years	300
HS23	BrP14	Bell Bar and Brookmans Park	Land rear of 2-12 Great North Road	2016	Green Belt	Moderate Low	0-10 years	10
N/A	BrP1	Bell Bar and Brookmans Park	Upper Bell Lane Farm	<b>2019</b>	Green Belt	Moderate	1-5/6-10 years	104
N/A	BrP12a	Bell Bar and Brookmans Park	Land north of Peplins Way	<b>2019</b>	Green Belt	Moderate High	1-5 years	125
N/A	BrP34	Bell Bar and Brookmans Park	Brookmans Park Transmitting Station	<b>2019</b>	Green Belt	Moderate High	6-10/11-15 years	300

### Little Heath

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
HS24	BrP7	Little Heath	Land south of Hawkshead Road	2016	Green Belt	High	0-10 years	100
HS25	LHe1	Little Heath	Land north of Hawkshead Road	2016	Green Belt	Moderate Low	0-10 years	35
N/A	LHe4/5	Little Heath	Videne, Hawkshead Road	<b>2019</b>	Green Belt	Moderate	1-5 years	36

\*LHe4/5 represents two HELAA sites but one allocation.

## Cuffley

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Settlement	Location	Proposed 2016/2019	Urban / Green Belt	GB Harm	Delivery within plan period	Number of dwellings
HS26	No02	Cuffley	36 The Ridgeway and land to the rear	2016	Urban	N/A	0-5 years	5
HS31	No10	Cuffley	Land west of St Martin de Porres Catholic Church	2016	Urban	N/A	11-15 years	5
HS27	Cuf1	Cuffley	Land at the Meadway	2016	Green Belt	Moderate	0-5 years	30
HS28	Cuf6	Cuffley	Land south of Northaw Road East	2016	Green Belt	Moderate	0-10 years	121
HS30	Cuf7	Cuffley	Wells Farm, Northaw Road East	2016	Green Belt	High	6-10 years	75
HS29	Cuf12	Cuffley	Land at Northaw Road East	2016	Green Belt	High	0-10 years	73
N/A	Cuf15	Cuffley	Land to south east of KGV playing fields	<b>2019</b>	Green Belt	Moderate High	0-10 years	176

## Glossary

**Article 4 Direction:** Made by the local planning authority, it restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development.

**B Class use:** Further business and industrial activities including **B1:** Business (**B1a:** Offices - except those already mentioned within Class A2; **B1b:** Premises for research and development; **B1c:** Industrial processes which “can” take place within a residential area without damaging the “amenity of that area”), **B2:** General industrial use, **B8:** Storage or distribution.

**Calverton Test:** *Calverton Parish Council v Greater Nottingham Councils [2015]* set out a number of matters that should also be identified and dealt with in order to ascertain whether ‘exceptional circumstances’ exist to justify making amendments to the Green Belt.

**CIL:** Community Infrastructure Levy. A charge which can be levied by local authorities on new developments to help them deliver the infrastructure needed to support the development.

**Dpa:** Dwellings per annum

**Dph:** Dwellings per hectare.

**EEFM:** East of England Forecasting Model. Developed to project economic, demographic and housing trends in a consistent fashion.

**Experian:** A consumer credit reporting company.

**HELAA:** Housing and Economic Land Availability Assessment. Assesses the suitability, availability and achievability of sites for development.

**HRA:** The Habitats Regulations Assessment (HRA) is a legal requirement of the plan making process and considers if the plan will have an impact on European designated wildlife sites.

**NPPF:** National Planning Policy Framework. Sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

**NPPG:** National Planning Practice Guidance. A web-based resource which brings together planning guidance on various topics into one place.

**OAN:** Objectively Assessed Need for housing.

**PPG:** See NPPG.

**SA:** Sustainability Appraisal. An assessment that must be carried out at each stage of preparing a local plan.

**SFRA:** Strategic Flood Risk Assessment.

**SHLAA:** Strategic Housing Land Availability Assessment – superseded by the HELAA.

**SHMA:** Strategic Housing Market Assessment. An assessment of future housing requirements in an area.

**SNHP:** Sub-National Household Projections. Provides an indication of the number of additional households that would form if recent demographic trends continue.

**SNPP:** Sub-National Population Projections. Indication of the future size and age structure of the population.

**Sui generis:** Certain uses which do not fall within any use class. Such uses include: theatres, houses in multiple occupation, childcare on domestic premises, scrap yards, petrol stations, shops selling and/or displaying motor vehicles, retail warehouse, clubs, nightclubs, launderettes, taxi businesses, amusement centres and casinos.

**Washed-over:** Settlements such as small villages which are located within the Green Belt.

**Windfall sites:** Sites which become available for development unexpectedly and are therefore not included as allocated land in a planning authority's development plan.