

Please ask for:  
Jonah Anthony

\* Reporting to Cabinet

4 January 2022

Dear Councillor

You are requested to attend a meeting of the WELWYN HATFIELD BOROUGH COUNCIL CABINET PLANNING AND PARKING PANEL to be held on Thursday 13 January 2022 at 7.30 pm via Zoom.

Yours faithfully



Governance Services Manager

**AGENDA**  
**PART 1**

1. **SUBSTITUTIONS**

To note any substitution of Panel Members in accordance with Council Procedure Rules.

2. **APOLOGIES**

3. **MINUTES**

To confirm as a correct record the Minutes of the meeting held on 16 December 2021 (previously circulated).

4. **NOTIFICATION OR URGENT BUSINESS TO BE CONSIDERED UNDER ITEM 8**

5. **DECLARATION OF INTERESTS BY MEMBERS**

To note declarations of Members' disclosable pecuniary interests, non-disclosable pecuniary interests and non-pecuniary interests in respect of items on this Agenda.

6. PUBLIC QUESTION TIME AND PETITIONS

Up to thirty minutes will be made available for questions from members of the public on issues relating to the work of the Committee and to receive any petitions.

7. LOCAL PLAN - ADDITIONAL SITES AND MODIFICATIONS TO THE PLAN  
(Pages 3 - 184)

8. SUCH OTHER BUSINESS AS, IN THE OPINION OF THE CHAIRMAN, IS OF SUFFICIENT URGENCY TO WARRANT IMMEDIATE CONSIDERATION

9. EXCLUSION OF THE PRESS AND PUBLIC

The Panel is asked to resolve:

That under Section 100(A)(2) and (4) of the Local Government Act 1972, the press and public be now excluded from the meeting for item 10 (if any) on the grounds that it involves the likely disclosure of confidential or exempt information as defined in Section 100A(3) and Part 1 of Schedule 12A of the said Act (as amended).

In resolving to exclude the public in respect of the exempt information, it is considered that the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

**PART II**

10. ANY OTHER BUSINESS OF A CONFIDENTIAL OR EXEMPT NATURE AT THE DISCRETION OF THE CHAIRMAN

<u>Circulation:</u>	Councillors	S.Kasumu (Chairman)	J.Quinton
		S.Boulton (Vice-Chairman)	D.Richardson
		G.Hayes	A Rohale
		A.Hellyer	P.Shah
		S.McNamara	C.Stanbury
		G.Michaelides	S.Thusu
		R.Platt	

Co-opted Members:-  
Residents' Panel Representatives

Corporate Management Team  
Press and Public (except Part II Items)

**If you require any further information about this Agenda please contact Jonah Anthony, Governance Services on 01707 357349 or email - [democracy@welhat.gov.uk](mailto:democracy@welhat.gov.uk)**

# Agenda Item 7

Part I

Main author: Sue Tiley

Executive Member: Cllr Stephen Boulton

All Wards

WELWYN HATFIELD BOROUGH COUNCIL  
CABINET PLANNING & PARKING PANEL – 13<sup>TH</sup> JANUARY 2022  
REPORT OF THE HEAD OF SERVICE (PLANNING)  
LOCAL PLAN – ADDITIONAL SITES AND MODIFICATIONS TO THE PLAN

## 1. Executive Summary

- 1.1 The purpose of this report is to consider options for further modifications to enable the Inspector to find the Plan sound.
- 1.2 The Council submitted the Local Plan for public examination in May 2017. The Inspector advised after the Stage 2 Hearing Session in October 2017 that the plan could not be found sound as submitted as it did not meet the Full Objective Assessment of Housing Need (FOAHN). At the stage the FOAHN was 800 dwellings per annum.
- 1.3 Further sites were submitted to the examination in November 2020 along with the Council's evidence relating to the implications of the latest Office of National Statistics (ONS) Sub-national household and population projections (2018) on the FOAHN. However, the Inspector indicated that these are not all sound and that further sites need to be allocated if the Plan is to be found sound. The Inspector has been clear that he considers it is possible to meet the revised FOAHN from the pool of sites he has examined. In September 2021 a report to this Panel set out the implications of his report and the matters that need to be considered when selecting sites.
- 1.4 Appendix A to this report reviews the options against the criteria set out in the Inspector's reports and evaluates the options against those criteria. The Sustainability Appraisal update of the Distribution Options is set out in Appendix C.
- 1.5 Appendix B to this report considers the case for a stepped trajectory and the Council's ability to deliver a five year land supply. Appendix D provides a list of all sites considered by the Inspector and which if any option they appear in.
- 1.6 The recommendations of this Panel will be referred to Cabinet and Full Council. Main Modifications will then be agreed with the Inspector for public consultation for six weeks.
- 1.7 It is intended that a Main Modifications Schedule will be made available for a Special Meeting of Full Council on 27<sup>th</sup> January.

## 2. Recommendations

- 2.1 That Members of this Panel
  - i) **Consider** the results of the Site Selection Addendum and the Sustainability Appraisal Addendum and the merits and disadvantages of the different options.

- ii) That Members accept the Officers recommendation set out in paragraph 4. 30 of the report and **recommend to Cabinet and Full Council** Option D as set out in Appendix D to this report for submission to the examination along with the relevant supporting information.
- iii) That Members **recommend to Cabinet and Full Council** that public consultation take place on Main Modifications to the Local Plan once the Inspector has confirmed the content of the Main Modifications required to make the Plan sound.

### **3 Background**

3.1 The Local Plan was submitted in May 2017 with a target of 12,000 homes. The Plan is being examined under the policy requirements set out in the 2012 National Planning Policy Framework (NPPF) rather than the revised policy requirements first set out in the 2018 NPPF. This means that the housing target for the Plan is established through the assessment of the FOAHN rather than the standard housing methodology. There have been ten stages of hearing sessions on the following matters:

- Stage 1 Legal Soundness and Duty to Cooperate (September 2017)
- Stage 2 Overarching Strategy (October 2017)
- Joint session with East Herts on Birchall Garden Suburb (January 2018)
- Stage 3 Topic Specific Policies (February 2018)
- Stage 4 Hatfield and Welwyn Garden City policies and allocations (June 2018)
- Stage 5 Green Belt Assessment (November 2018)
- Stage 6 Birchall Garden Suburb, Housing and Employment Land Needs (December 2019)
- Stage 7 Birchall Garden Suburb and Symondshyde (March 2020)
- Stage 8 Village Sites (July/August 2020)
- Stage 9 Additional Sites, FOAHN, Windfall and Green Belt boundaries (February/March 2021)

3.2 At the end of the Stage 2 session the inspector indicated that the Submitted Local Plan's housing target did not meet the FOAHN in full and that there was insufficient evidence to justify this. He therefore asked the Council to consider adding in additional sites and to carry out an assessment of harm to the green belt.

3.3 In addition the Inspector subsequently asked the Council to review the implications of the 2016-based and then more recently the 2018-based population and household projections. The 2016-based projections were considered at the Stage 6 hearing sessions in December 2019 and the 2018 based projections at the Stage 9 hearing sessions in February 2021.

3.4 In response to the Inspector's request for more sites the Council carried out a call for further sites in 2019 and subsequent public consultation on the promoted sites. Members considered the results of the consultation, the officer's analysis set out in the [Site Selection Background paper](#), [its appendices](#), the amendments to [the Sustainability Appraisal](#) and other evidence at a meeting of [this Panel](#) and subsequently Cabinet in January 2020. Further consultation on preferred alterations to the Plan then took place between February and April 2020.

- 3.5 At the meeting of this Panel on 12<sup>th</sup> November 2020 Members agreed to depart from the advice it had received from its consultants on the implications of the 2018 projections. Whilst the Council's consultants considered that the FOAHN could be reduced to 14,300 dwellings based on the Alternative variant projection, this Council considered that the ten year variant projection was more appropriate and that the FOAHN should be reduced to 13,800 dwellings. This was subsequently confirmed by Cabinet and Full Council.
- 3.6 At the same meeting of this Panel Members selected sites to meet a lower housing target taking account of the range of population and household projections, the evidence on Green Belt harm and the results of the public consultation. Members also proposed that some sites in the submitted Plan should also be removed because of the extent of harm to the Green Belt. This would have resulted in a proposed housing target of 13,277. The Inspector did not find these proposed alterations were sufficient to make the Plan sound or that the lower housing target was justified by the evidence.
- 3.7 In his report to the Council EX274 on the [FOAHN](#) the Inspector concluded that the FOAHN for the borough had fallen from 16,000 to 15,200 and not 13,800. This was based on an additional 900 dwellings being added above the Turley FOAHN of 14,300 to address the issue of net in-commuting and the needs of the economy. He expressed concern at the levels of jobs growth in the borough outstripping the growth in the economically active population as well as increasing congestion on the strategic road network. The Inspector did not comment on the extent to which the 1,350 dwelling urban extension to Welwyn Garden City (Birchall Garden Suburb) in the adopted East Herts Local Plan or the extent to which the 21% uplift applied to both the 2016 and 2018 conclusions on the FOAHN by Turley assists in this regard.
- 3.8 It should be noted, however, that the most recent data indicates a fall in the number of jobs and a growth in the resident workforce. Furthermore the 2018 alternative variant projection favoured by Turley results in a larger economically active population than the 2016 set of projections.
- 3.9 In terms of the Local Plan and the provision for new jobs the continuing losses of employment land result in a shortfall of provision to meet even the needs of the percentage of the growth in the economically active population who might choose to work in the borough.
- 3.10 Congestion on the strategic road network is at its worst in the morning peak in a southerly direction and in the evening peak in a northerly direction. Data collected by the County Council indicates that this is caused not just by traffic emanating from the borough but through traffic from districts to the north as well as those who work in the borough.
- 3.11 The Stage 9 Hearing Session, which took place in February and March 2021, considered the additional sites put forward by the Council as well as sites not promoted by the Council and the Inspector's reports set out his conclusions on all those sites as well as the FOAHN. Appendix A to this report considers his conclusions with regards to the additional sites.

- 3.12 In his letter EX271 and Supplementary report EX272 the Inspector set out some concerns relating to how sites had been selected and set out some tests which need to be considered when arriving at a final distribution. These were reported to the September 2021 meeting of the Panel and in summary comprise the following:
- The Council must establish a 5 Year Housing Land Supply + 20% from adoption
  - On adoption there should be a proportionate spread of housing throughout Plan period
  - Selection of sites around villages should result in a proportionate distribution tempered by the two classes of village and by their comparative sustainability and must meet local needs.
  - There is a need to increase dwellings in Welwyn Parish area
  - The approach to the selection of sites needs to take into account a range of criteria not just Green Belt harm.
- 3.13 In addition, the Inspector stated that if the Council still require a stepped housing target, as set out in the submitted plan, then this must be justified in the context of the availability of additional sites.
- 3.14 Since the Inspector wrote his reports the government has confirmed that the proposed planning reforms as set out in the White Paper and associated papers and consulted upon in 2020 are subject to further review. Members of Cabinet have written to the Secretary of State seeking clarification on forthcoming planning reforms referred to by the Prime Minister in his speech at the Conservative Party Conference on the 6<sup>th</sup> October and the appropriateness of the FOAHN set out in the Inspector's reports.
- 3.15 The response from the Minister of Housing did not comment on the FOAHN because of the Secretary of State's quasi-judicial functions. He pointed out that any concerns about this should be set out to the Inspector. He stressed the importance of having an up to date Local Plan, the risk of planning by appeal and the government's priority for having plans in place by 2023. He also confirmed the government's commitment to protecting and enhancing the Green Belt and the benefits of using brownfield land.
- 3.16 The Minister pointed out that the Local Plan is being examined under transitional arrangements with regards to the requirements set out in the 2012 NPPF and therefore is not subject to the standard housing methodology. The housing requirement should take account of constraints such as the Green Belt.
- 3.17 The government provides no guidance on the extent to which the Green Belt should be considered a constraint. It is clear from other local plan examinations that it is not considered to be an absolute constraint. The NPPF requires there to be exceptional circumstances for the release of land from the Green Belt. The Inspector has already confirmed that the scale of housing need is such a circumstance but has reminded the Council that exceptional circumstances need to be set out for every site proposed for release. As stated above the Inspector has confirmed that harm to the Green Belt is just one factor to consider in the selection of sites and only where very high harm would result should this be considered to be an absolute constraint.

## 4 **Explanation**

4.1 The options which officers have identified for the selection of sites are set out in the Site Selection Update in Appendix A. This provides an update to the previous site selection work taking account of the Inspector's conclusions and tests for a sound spatial strategy. As set out in the Introduction to this document the approach comprises the following stages:

**Stage 1** define local need and proportionate levels of growth

**Stage 2** identify different distribution options based on Inspector's conclusions on sites and previous assessment

**Stage 3** test different distributions against Inspector's tests,

**Stage 4** Refine options to improve performance

**Stage 5** Test refined options against infrastructure implications and Sustainability Appraisal.

4.2 In parallel with this analysis of the need for a stepped target was carried out. This considered the ability of the Council to have a five year land supply + 20% and make up the shortfall for under delivery since 2016 in the first five years. The results of this analysis are set out in Appendix B to this report. Appendix B also contains the anticipated rate of delivery of each site in the Housing Trajectory.

4.3 **Stage 1.** In order to identify distribution options which are likely to be found sound officers have first sought to define what might be considered 'local need' in order to give a minimum figure for each village in tiers 3 and 4 of the settlement hierarchy (large and small villages excluded from the Green Belt).

4.4 Clearly the majority of villages will need to deliver more than the local need or else it will not be possible to meet the FOAHN. The Inspector has indicated that the distribution should be proportionate but tempered towards the 'tier 3' settlements and those villages with stations. These are:

- Tier 3 – Welwyn, Welham Green, Brookmans Park and Cuffley
- Villages with stations – Digswell, Welham Green, Brookmans Park and Cuffley

4.5 The Settlement Strategy which is set out in Policy SP3 of the draft submitted Plan 2016 requires the majority of development to be located within and adjoining the two towns whilst more limited development compatible with their scale and character is to take place in and around the excluded (not in the Green Belt) villages.

4.6 As part of the evidence on the FOAHN the Inspector asked the Council to provide a settlement breakdown of natural change data as well as a proportionate breakdown based on household size. This is published as [EX265](#) and Table 2 provides the data which officers have used as the basis for identifying the minimum 'to find' figure required to meet local need. In order to provide a basis for identifying what might be considered to be proportionate officers have used the data in Table 1 of the same document. This should not be considered an absolute maximum but is a basis for identifying what then might be considered a disproportionate distribution.

4.7 **Stages 2 and 3:** On this basis officers identified distribution options using the results of the previous site selection assessment as well as the Inspector's criterion on

locational accessibility and any other site specific comments arising from the Stage 9 Hearing Sessions.

- 4.8 Two options were initially identified based upon
- Option A) a proportionate approach; and,
  - Option B) without Symondshyde.
- 4.9 These options were then tested against the need to have a five year land supply and the need to have a proportionate spread of housing throughout the plan period.
- 4.10 There are different approaches to the calculation of a five year land supply. The one more usually used on appeal is known as the Sedgefield approach and is a tougher requirement to meet as it requires making up for any shortfall in the first five years following adoption. The second approach is known as the Liverpool approach and allows for any shortfall to be met by the end of the plan period. In East Herts the Planning Inspector adopted a third approach which requires the shortfall to be met by the end of the first ten years.
- 4.11 Completions for the period 2016-21 are **2,514** against a target of **3,800** (760 x 5) resulting in a shortfall of **1,286**. This then gives the following targets for assessing delivery across the plan period. The Alternative Approach included below is a variant of the East Herts approach and is calculated on the basis that the shortfall is made up for in years 6-10.

**Table 1 – Five year housing land supply + 20% targets**

Plan period	Sedgefield approach	Liverpool approach	Alternative approach
Years 1-5	5,846	4,989	4,560
Year 6-10	3,800	4,608	5,086
Year 11-15	3,040	3,089	3040

- 4.12 The analysis carried out on the Council's ability to deliver a five year land supply + 20% concluded that is not possible to meet the Sedgefield approach. It also identified that the requirement to achieve a five year land supply and the nature of the sites capable of delivering completions in the first five years results in a shortfall in provision in the last five years with over provision in the middle part of the plan period.

**Table 2 – Options with Symondshyde (A) and without Symondshyde (B)**

Plan period	Option A	Option B
Years 1-5	4,470	5,046
Year 6-10	5,541	5,501
Year 11-15	2,854	2,157
2016-36	15,379	15,218

- 4.13 Option A performed best in terms of delivery in the middle and last five years and the settlement strategy but less well in terms of the five year land supply whilst Option B performs better in terms of the five year land supply on adoption but poorly in terms of the last five years of the plan period and results in disproportionate growth in some settlements in particular Stanborough. Option B is dependent on some sites which the Inspector has indicated should only come forward if there is a local need for example BrP1 in Brookmans Park and HS24 (BrP7) in Little Heath. In both cases the



inclusion of these sites in combination with other better performing sites would exceed the minimum natural growth requirement and the proportionate requirement (by 64% in the case of Brookmans Park) and therefore it is considered that Option B would be likely to be found unsound. However, Option A would also be likely to be found unsound as it would not deliver a five year land supply whereas under the alternative approach and the Liverpool approach there is the potential to provide one with a different distribution.

- 4.14 **Stage 4:** As a consequence, options C and D were identified which sought to improve the performance of A and B (Option C being a variant of Option B and Option D a variant of Option A). It is evident from this analysis that the reduction in size of Birchall Garden Suburb along with the option of removing Symondshyde has a significant impact on delivery of sites in the last five years of the plan period. As a consequence, Symondshyde has been included in both options with option C having more limited growth during the plan period and the remainder of the settlement coming forward after the end of the plan period (had the Inspector found the whole of Birchall Garden Suburb to be sound Symondshyde would not be required under this option).
- 4.15 The size of alternative sites means that unless a phasing policy is introduced, or the Inspector reconsiders his conclusions with regards to Birchall Garden Suburb, supply cannot be improved in the last five years above 2,899 dwellings. It should also be noted that under both scenarios the target of 15,200 is exceeded. This would provide a contingency should some sites not achieve their estimated capacities or take longer to deliver but also provides the opportunity to make some further minor adjustments.

**Table 3 Refined Options**

Plan period	Option C	Option D
Years 1-5	4,779	4604
Year 6-10	5,409	5596
Year 11-15	2,657	2,907
2016-36	15,359	15,614

- 4.16 **Stage 5:** The previous work carried out to test the infrastructure implications of a dwelling distribution of 16,000 dwellings concluded that whilst there was a need for investment in infrastructure there were no show stoppers. The most significant implications relate to primary school provision particularly in the villages. In the north of the borough option D is preferred but in the south of the borough option C is preferred. With regards to Symondshyde a smaller development of 500 dwellings during the plan period is likely to create difficulties with ensuring sufficient critical mass to provide supporting infrastructure during the plan period. With regards to the Sustainability Appraisal Option D performs marginally better than option C. This is because Option C places additional growth at villages and therefore has the potential to substantially alter their character and the settlement pattern of the borough. However, both include growth at Symondshyde, which will introduce a substantial amount of growth to a rural location.
- 4.17 Tables 4 and 5 set out the implication for the spatial strategy and the performance of each option against the Inspector’s tests for a proportionate approach to the distribution of sites.

**Table 4 – Options Analysis by Settlement**

	Option A	Option B	Option C	Option D	Local need target
WGC	6,525	6,525	6,525	6,525	1,464 -6,797
Hatfield	3,596	3,596	3,596	3,596	995 – 4,621
Woolmer Green	227	286	261	261	43 - 201
O&MH	86	86	86	86	89 - 413
Welwyn	254	502	502	254	112 - 490
Digswell	104	140	124	104	47 - 206
Lemsford	0	27	27	0	7 - 30
Stanborough	19	117	19	19	9 - 41
Welham Green	368	540	540	441	96 – 419
Brookmans Park & Bell Bar**	421	828	724	549	109-506
Little Heath	104	204	104	104	34 -158
Cuffley	409	585	585	409	132-575
Symondshyde	1500	0	500*	1500	n/a
Rural Areas	84	84	84	84	137 -588

Notes: \*Symondshyde, Option C, 1000 dwellings to be delivered post 2036. None of these options include the small site allowance of 14 dwellings. \*\* The numbers for Brookmans Park and the commitments data needs to be adjusted downwards by 11 dwellings as a consequence of a Lands Tribunal decision relating to the enforcement of a covenant.

**Table 5 - Options Analysis by Settlement Hierarchy**

	Option A	Option B	Option C	Option D	OAN target
Tier 1 and 2 Towns	10,121	10,121	10,121	10,121	11,418
Tier 3 large villages*	1,452	2,471	2,367	1,653	1,990
Villages with Stations*	1,302	2,109	1,989	1,503	1,706
Tier 4 villages	521	743	575	555	978
New Tier 4 village - Symondshyde	1,500	0	500	1,500	n/a
Welwyn Parish	444	728	712	444	Local need target 244 – 1,109

\*The numbers for Brookmans Park and the commitments data needs to be adjusted downwards by 11 dwellings as a consequence of a Lands Tribunal decision relating to the enforcement of a covenant.

- 4.18 Option D seeks to improve the performance of Option A by increasing the number of sites in the five year land supply. It seeks to deliver sufficient housing to meet local need with more growth being directed to those settlements higher in the hierarchy or with stations. It seeks to reduce growth in some settlements in order to provide greater protection for heritage and environmental assets. It therefore better meets the

strategy set out in the Local Plan as well as providing more development at the end of the plan period. Furthermore it will allow the strategy set out in the draft submitted plan for the provision of Gypsy and Traveller sites to remain largely unaltered.

- 4.19 Option C seeks to improve the performance of Option B by improving supply in the last 5 years therefore providing better protection for the Green Belt than Option B. It removes those sites which the Inspector has indicated would not be justified if not required to meet local need. The distribution is more heavily weighted towards the tier 3 settlements and those villages with stations than Option D with the consequence that some of those settlements take significantly more than their proportionate share in particular Brookmans Park.
- 4.20 Under Option C the approach for the provision of Gypsy and Traveller pitches would also need to be reviewed as the strategy in the plan is based on sites coming forward in the strategic allocations with the need being apportioned based on the size of the allocation. If Symondshyde is not to be allocated the pitches would need to be reassigned.
- 4.21 The Strategy set out in the submitted Local Plan is to make provision for 61 Gypsy and Traveller pitches for the period 2016-32. The first five years through the allocation of individual sites and as part of the overall allocation for housing at the strategic sites. Initially a site at Coopers Green Lane was to make off site provision for Symondshyde but this was found unsound by the Inspector and the promoters subsequently agreed to make provision at Symondshyde for 6 pitches and to increase the provision at North West Hatfield to 15 pitches.
- 4.22 The changes to the Local Plan submitted by Members in November 2020 proposed the removal of two of these locations - Symondshyde (6 pitches) and the extension to Barbaraville (4 pitches). This would result in a shortfall of 10 pitches. The Inspector has not commented on the soundness of the Barbaraville allocation so there is a potential shortfall of 6-10 pitches.
- 4.23 The provision for pitches at the strategic allocation North East Welwyn Garden City could be increased by a further 6 pitches given that the site has been found sound for an expansion from 625 dwellings to 845 dwellings. This proposition has been considered at the examination.
- 4.24 Should Option D be approved then the provision of pitches would form part of the allocation of Symondshyde and the increase in pitches at North East Welwyn Garden City may therefore no longer be required. If Option C were to be approved then the reduced number of dwellings could potentially also result in reduced provision at Symondshyde for the plan period and some provision being made for the period after 2036. In this case there would then still be a need for an increase in pitches at North East Welwyn Garden City to make up some of the plan period shortfall based on a proportionate approach.
- 4.25 Options B and C include sites Wel1, Wel2, Wel6 and Wel15 which all require the provision of a new bridge and the widening of Fulling Mill lane which it is understood will require some land from Singlers Marsh which is a designated nature reserve. Singlers Marsh is the subject of a town and village green application. The Registration Authority, Hertfordshire County Council (HCC), has decided that the application should be considered at a public inquiry and, therefore, it is unlikely that the final

decision will have been made by HCC by the date of the Full Council meeting at which this report will be considered. The Council has taken legal advice in relation to the potential implications of the town and village green application upon the Local Planning process. Based on that advice, if the land were to become registered as a town and village green then, so long as the registration remained effective, the land could not be used to widen Fulling Mill Lane or to provide any necessary bridge. However, registration as a village green would not be a showstopper to allocation of the land due to the possibility of an application to deregister or to appropriate a small part of the land in order to allow the development to go ahead. Whilst the success of any such application could not be guaranteed the Council would have an arguable case.

- 4.26 All the options are based on assumptions for increases in capacity of some sites which the Inspector has already assessed as sound or potentially sound. In most cases the Inspector has expressed views on the potential for increasing capacity on sites. However the hearing session on the SDS3 allocation on Broadwater Road known as the Wheat Quarter took place before the decision last November to increase the capacity of these sites as planning applications for revised schemes were in preparation. These have yet to be determined and are unlikely to receive a decision before the Council has agreed to go back to the Inspector.
- 4.27 It should be noted that if these applications as currently proposed are approved they would result in an increase in capacity above the additional 600 dwellings identified by this Council in November last year. However, if Members now have concerns about the deliverability of an additional 600 dwellings at the Wheat Quarter (SDS3) then Option D offers the potential to reduce the capacity by up to 400 dwellings as indicated in Appendix D to this report.
- 4.28 Under all options a stepped target will be required and the explanation and justification for this is set out in Appendix C. It is impossible to make up the shortfall in the first five years following adoption and the Council would continue to fail the Housing Delivery Test in the early years. This would mean the policies in a newly adopted plan would have limited weight. It is therefore considered that the case for a stepped trajectory is a strong one.
- 4.29 Furthermore, although not part of Welwyn Hatfield's housing target the East Herts portion of Birchall Garden Suburb will provide a supply of housing throughout the plan period for those looking to live in Welwyn Garden City. It will also provide an increase in the economically active workforce able to access jobs in Welwyn Garden City and Hatfield by sustainable modes of travel and help to address the Inspector's concerns about in- commuting.
- 4.30 It is considered that on balance Option D provides a distribution more closely aligned to the vision and objectives and spatial strategy set out in the submitted plan as well as the tests set by the Inspector for a proportionate distribution and proportionate delivery throughout the plan period. As set out in paragraph 4.26 above the increase in capacity assumptions could be reduced for the Wheat Quarter allocation by up to 400 dwellings. This would result in a housing supply of **15,203**<sup>1</sup>. It is this option which is recommended by officers as it gives greater flexibility for decision making.

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<sup>1</sup> This figure includes a deduction of 11 dwellings from the commitments figure as a consequence of a decision by the Upper Tribunal (Lands Chamber). The figures in the Appendices and Tables 4 and 5 do not.

- 4.31 Alternatively the plan period numbers could be reduced at Symondshyde thereby reverting back to the original allocation of 1,130 dwellings with the remaining dwellings being delivered after 2036. This would result in a supply of **15,233<sup>2</sup>**.
- 4.32 Should Option C be preferred by Members it will be necessary to review the distribution of Gypsy and Traveller pitches to better reflect the size of the strategic allocations.

### Next Steps

- 4.33 Subject to Members approving changes to the Plan which the Inspector considers to be sound consultation will take place on the Main Modifications in February for six weeks once these have been confirmed by the Inspector.
- 4.34 A number of Main Modifications have already been discussed at hearing sessions and the last schedule submitted by the Council was published on the Council's website (accessed [here](#)) in January 2021. It should be noted however that further modifications were discussed as part of the Stage 9 hearing sessions.
- 4.35 The representations, the key issues raised and the Council's response will then be forwarded to the Inspector. He will then write his final report on the soundness of the Plan. If the representations raise any new issues which have not been considered by the examination there may be a need for further statements or hearing sessions.
- 4.36 The Sustainability Appraisal has been updated to assess additional sites and the alternative distribution options. It will again need to be updated to appraise the main modifications required by the Inspector to make the plan sound as well as any changes to the distribution.
- 4.37 The Inspector's report along with the Main Modifications required to make the plan sound will then be brought back to the Council to determine whether or not it wishes to adopt the Local Plan. Once the legal challenge period has been completed the Local Plan would then form part of the development plan for the borough, its policies would be afforded full weight in decision making and the housing delivery test would be assessed against the targets sets set out in the plan rather than the standard methodology.

## **5 Legal Implications**

- 5.1 The preparation of the Local Plan is governed by legislation, most notably the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011, as well as case law and secondary legislation set out in regulations. It also has to comply with relevant legislation relating to the preparation of Sustainability Appraisal and Habitats Regulatory Assessment.
- 5.2 The legislation requires that the Local Plan is prepared in accordance with the Local Development Scheme (LDS), the Statement of Community Involvement (SCI) and, under the transitional arrangements, the 2012 version of the National Planning Policy Framework (NPPF).

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<sup>2</sup> As above

- 5.3 The legislation requires that local planning authorities seek to deliver sustainable development when preparing the plan.
- 5.4 The NPPF sets out the Tests of Soundness against which the Local Plan is examined. That is that the plan is positively prepared, justified, effective and consistent with national policy.
- 5.5 The Inspector has made it clear that only he can remove sites from the Submitted Local Plan if he considers them to be unsound. Should Members no longer wish to proceed with all the sites considered to be sound the only option would be for the Council to withdraw the Plan and start again.
- 5.6 The Council can only lawfully adopt the Local Plan if the Examining Inspector finds it “sound” and only in the form which the Inspector has found it sound (i.e. the Council would not be able to make material changes to the version of the Plan which the Inspector has found sound). Should the Inspector find the Plan to be unsound the Council would be unable to adopt the Plan and, in this eventuality, the Council would not have an up-to-date Plan. Whilst it would be open to the Council to bring a case in court to challenge the validity of the Inspector’s conclusions it is unlikely that such a challenge would succeed as the court intervenes only in clear cases of legal error. Given that the decision whether a Plan is “sound” is, inherently, one of planning judgment the courts heavily incline to leaving things in the hands of the examining inspector. If the Council wants to secure a sound plan it has to submit sufficient additional sites to deliver 15,200 dwellings over the plan period.
- 5.7 The Local Plan process could be subject to legal challenge if any party considers that it has not been prepared in accordance with legislation and national guidance.

## **6 Financial Implications**

- 6.1 The financial implications of not having a sound Local Plan is that the Council would have to start the process again. This would require updated evidence, another call-for-sites exercise, updated site appraisal, updated sustainability appraisal and habitats assessment and further public consultation.
- 6.2 In the meantime the Council will continue to receive speculative planning applications for both urban and green belt sites (both those that are currently favoured in the plan and those that have been rejected) and could face costs if these were refused and successfully appealed.

## **7 Risk Management Implications**

- 7.1 The Inspector has made it clear that unless the Council adds in more sites to the Local Plan to achieve the FOAHN it will be found unsound. He has also made it clear that decisions upon which sites to add into the Plan need to be based on sound planning grounds which are applied consistently and transparently.
- 7.2 The current adopted District Plan is considered to be out-of-date, particularly with regard to policies relating to new residential development. If this Plan is withdrawn or found unsound then the Council would have to rely on policies in the NPPF for

decision making. Emerging policies in the Local Plan would no longer have any weight in decision making.

7.3 Without an adopted Local Plan the Council's five year land supply figures will continue to be based on the Government's standard methodology, which is currently 875 homes per year. Because the Council no longer has a five year land supply the presumption in favour of sustainable development already applies. As a consequence, policies seeking to protect areas from residential development would carry less weight and the Council is more likely to lose decisions on appeal. This will impact on the Council's performance figures, which could place it at risk of government intervention.

7.4 The Housing Delivery Test results in a requirement for a 20% buffer being added to the five year land supply figures. In future years, without an adopted plan, it is likely that performance will fall below 45%, resulting in a risk of special measures.

7.5 Regulations now require a plan to be reviewed every five years and particularly where there are significant changes in the housing need figure. Paragraph 74 of the NPPF 2021 states:

*"The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

*a) 5 % to ensure choice and completion in the market for land; or*

*b) 10 % where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement **OR recently adopted plan** (Footnote 40), to account for any fluctuations in the market during that year; or*

*c) 20 % where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply (Footnote 41)".*

Footnote 40 states: *"For the purposes of paragraphs 74b and 75 a plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered 'recently adopted' **until 31 October in the same year**".*

Footnote 41 states: *"This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85 % of the housing requirement".*

7.6 Should housing completions not increase the Council will come under pressure to carry out an immediate review of the Local Plan. Members should note how short the period is for an up-to-date adopted plan to count towards a five year housing land supply figure. New demographic and household projections are published every two years.

7.7 Members should also note that because the plan is being examined against the 2012 NPPF it may, once adopted, need to be updated to bring it in line with the 2021 NPPF. Wherever possible Officers will seek to ensure there is not likely to be a conflict.

7.8 In proposing modifications to the plan, the Council has to ensure that it has not proposed so many changes that it is, in essence, a different plan, which even if found sound might make it subject to legal challenge. Nevertheless, the Council is allowed to make changes to make the plan sound and these must by definition be substantive otherwise they would not be needed to make the plan sound. Substantive changes which are not required to make the plan sound cannot be made.

## **8 Security & Terrorism Implications**

8.1 There are no security and terrorism implications arising from this report.

## **9 Procurement Implications**

9.1 There are no procurement implications arising from this report.

## **10 Climate Change Implications**

10.1 There are climate change implications arising from the identification of land for housing and employment. The Sustainability Appraisal judges that there will be greater energy use and emissions of greenhouse house gases and reductions in air quality.

10.2 The effects of this will be mitigated through the implementation of policies in the plan on sustainable design and construction and delivering sustainable development.

10.3 Minimising the need to travel by locating development in accessible locations close to a range of facilities and services and/or where they are close to public transport and cycle paths will assist in this or, alternatively, requiring through Section 106 or Community Infrastructure Levy (CIL) to improvements to public transport infrastructure, cycleways and footpaths.

10.4 Ensuring the balance of employment provision alongside housing will also help to address this.

## **11 Link to Corporate Priorities**

11.1 The subject of this report is linked to the Council's Business Plan 2018-21 and, in particular, Priority 3 Our Housing - to plan for current and future needs and Priority 4 Our Economy – sustainable growth.

## **12 Health and Wellbeing Implications**

12.1 Providing sufficient housing and jobs have health and wellbeing benefits for residents as does the quality of the environment.

## **13 Human Resources Implications**

13.1 There are no human resources implications arising from this report. The Local Plan will continue to be prepared by the policy team. Regardless of whether the Plan is found sound, withdrawn or found unsound, it is likely to increase the number of planning applications and the caseload for development management officers.



## **14 Communications and Engagement Implications**

- 14.1 Officers will work closely with communications colleagues to ensure that Local Plan progress is communicated to the public through newsletters, information on the website, press briefings, etc.
- 14.2 Public consultation has been carried out in accordance with the Statement of Community Involvement.

## **15 Equality and Diversity Implications**

- 15.1 All of the policies in the Submitted Local Plan were subject to equality impact assessment.
- 15.2 Any policies which are subsequently proposed for main modification will be subject to an updated equality impact assessment.

### **Author**

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January 2022

### **Appendices**

Appendix A – Site Selection Addendum 2021  
Appendix B – The case for a stepped trajectory  
Appendix C – Sustainability Appraisal Addendum  
Appendix D – List of sites, assumptions and options

### **Background Documents**

Letter from members of Cabinet to the Secretary of State dated 8 October 2021  
Letter from the Minister of State for Housing dated 18<sup>th</sup> November 2021

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# **Welwyn Hatfield Local Plan**

## **Housing Sites Selection**

### **Background Paper Addendum 2021**

**December 2021**



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# 1. Introduction

## Background

- 1.1 The selection of housing sites for allocation in the Draft Local Plan Proposed Submission 2016 (the submitted draft plan), was informed by a Site Selection Background Paper 2016. This paper brought together the key conclusions arising from the several strands of evidence and appraisals, including but not limited to the Housing and Employment Land Availability Assessment (HELAA) 2016, the Green Belt Study Review and The Sustainability Appraisal 2016.
- 1.2 At the end of the Stage 2 hearing session, the Inspector indicated that the Submitted Local Plan's housing target did not meet the Full Objectively Assessed Housing Need (FOAHN) in full and that there was insufficient evidence to justify this. He therefore asked the Council to consider adding in additional sites and to carry out an assessment of harm to the Green Belt.
- 1.3 A Sites Selection Background Paper 2019 was prepared setting out the key issues and the process associated with the selection of additional sites to inform the ongoing examination of the submitted draft plan. This Background Paper was used to inform the Council's decisions on the most suitable sites to be allocated in the Local Plan.
- 1.4 In November 2020 following consultation, the Council selected additional sites for inclusion in the Plan. Members also proposed that some sites in the submitted plan should be removed because of the extent of harm to the Green Belt arising from allocations.
- 1.5 The Stage 9 Hearing Sites held in February and March 2021 considered the additional sites, as well as sites not promoted for inclusion by the Council. The Inspector's report (EX273) set out his conclusions on those sites as well as the Full Objectively Assessed Housing Need (FOAHN).
- 1.6 The Inspector has concluded that there has been a meaningful change to the FOAHN justifying a reduction in the housing target from 16,000 dwellings (800 per year) to 15,200 dwellings (760 per year) for the period 2016-36, but not as low as advocated by the Council or suggested by the Council's consultants, Turley. The Council now needs to consider how best to meet the FOAHN if it wishes to have a sound Plan.

## Purpose of Report

- 1.7 This document has been produced as an addendum to the 2016 and 2019 Site Selection Background Papers and focuses on the sites examined by the Inspector which present options for additional allocations to meet the FOAHN. It provides a transparent and comprehensive comparative assessment of the options for additional sites.
- 1.8 In his letter and supplementary report, the Inspector sets out the considerations that must be followed. These criteria include:
  - Establishing a 5 Year Housing Land Supply + 20% from adoption
  - On adoption, a proportionate spread of housing throughout plan period
  - Selection of sites around villages should result in a proportionate distribution tempered by the two classes of village and by their comparative sustainability, and must meet local needs
  - A need to increase dwellings in Welwyn parish area

- The approach to the selection of sites needs to consider a range of criteria not just Green Belt harm.

1.9 The first 3 criteria have site-specific elements to them, whereas the final consideration must be undertaken on a settlement basis and in some instances a parish basis.

1.10 This addendum paper, September 2021, outlines the methodology for assessing sites for consideration by the Planning Inspector presiding over the WHBC Local Plan Examination and provides a transparent and comprehensive assessment of the options for additional sites.

### **Defining local need and a proportionate development strategy**

1.11 To identify distribution options which are likely to be found sound, it is first necessary to define what might be considered 'local need' to give a minimum figure for each village in tiers 3 and 4 of the settlement hierarchy (large and small villages excluded from the Green Belt). Although Lemsford and Stanborough are tier 5 and 6 settlements respectively, they have also been included in the assessment, as the Inspector considered sites in these settlements at the hearing sessions.

1.12 Most villages will need to deliver more than the local need or it will not be possible to meet the FOAHN. The Inspector has indicated that the distribution should be proportionate but tempered towards the 'tier 3' settlements and those villages with stations. These are:

- Tier 3 – Welwyn, Welham Green, Brookmans Park and Cuffley
- Villages with stations – Digswell, Welham Green, Brookmans Park and Cuffley

1.13 The Settlement Strategy which is set out in Policy SP3 of the draft submitted Plan 2016 requires most of the development to be located within and adjoining the two towns whilst more limited development compatible with their scale and character is to take place in and around the excluded (not in the Green Belt) villages.

1.14 As part of the evidence on the FOAHN the Inspector asked the Council to provide a settlement breakdown of natural change data as well as a proportionate breakdown based on household size. This is published as [EX265](#).

1.15 This data provides a dwelling range with a minimum requirement based on meeting need arising from natural change and a proportionate target based on the proportion of the OAN each settlement would need to meet if it were distributed on the basis of the proportion of total households within that settlement. This does not set an upper limit but helps to define what might be considered disproportionate. Tiers 1- 3 settlements would be expected to be delivering levels of growth close to their proportionate target. Tables 1 and 2 set out the data for each Tier 1-4 settlement, Lemsford, Stanborough and the remaining rural areas.

*Table 1 Natural Change in Dwellings*

	2011 Census - Proportion of Total Households	Natural Change in Households (2014 - Return Ratio Applied)	Natural Change in Dwellings (2014 - Return Ratio Applied)
Welwyn Garden City	44.72%	1422	1464
Hatfield	30.40%	966	995
Woolmer Green	1.32%	42	43
Oaklands & Mardley Heath	2.72%	86	89
Welwyn	3.43%	109	112
Digswell	1.44%	46	47
Lemsford	0.20%	6	7
Stanborough	0.27%	8	9
Rural North	0.88%	28	29
Welham Green	2.93%	93	96
Brookmans Park and Bell Bar	3.33%	106	109
Little Heath	1.04%	33	34
Cuffley	4.02%	128	132
Rural South	3.30%	105	108
Total	100%	3,179	3,274

*Table 2 Proportionate distribution of the Objectively Assessed Need for housing*

	2011 Census - Households	2011 Census - Proportion of Total Households	FOAHN - Proportional distribution
Welwyn Garden City	19505	45%	6,797
Hatfield	13258	30%	4,621
Woolmer Green	576	1%	201
Oaklands & Mardley Heath	1185	3%	413
Welwyn	1495	3%	521
Digswell	626	1%	219
Lemsford	89	0%	30
Stanborough	116	0%	41
Rural North	384	1%	134
Welham Green	1277	3%	445
Brookmans Park and Bell Bar	1453	3%	506
Little Heath	454	1%	158
Cuffley	1755	4%	611
Rural South	1440	3%	502
Total	43613	100%	15,200



## 2. Distribution Options

- 2.1 Initial distribution options have been identified using the results of the previous site selection assessment as well as the Inspector's criterion on locational accessibility and any other site specific comments arising from the Stage 9 Hearing Sessions.
- 2.2 Two options were initially identified based upon
- Option A: a proportionate approach; and,
  - Option B: without Symondshyde.
- 2.3 These options were tested against the need to have a five year land supply and the need to have a proportionate spread of housing throughout the plan period.

### *Five Year Housing Land Supply*

- 2.4 There are different approaches to the calculation of a five year land supply. The one more usually used on appeal is known as the Sedgefield approach and is a tougher requirement to meet as it requires making up for any shortfall in the first five years following adoption. The second approach is known as the Liverpool approach and allows for any shortfall to be met by the end of the plan period. In East Herts the Planning Inspector adopted a third approach which requires the shortfall to be met by the end of the first ten years.
- 2.5 Completions for the period 2016-21 are **2,514** against a target of **3,800** (760 x 5) resulting in a shortfall of **1,286**. This then gives the following targets for assessing delivery across the plan period. The calculation below is a variant of the East Herts approach and is calculated on the basis that the shortfall is made up for in years 6-10.

*Table 3 Five year housing land supply + 20% targets*

Plan period	Sedgefield approach	Liverpool approach	Alternative approach
Years 1-5	5,846	4,989	4,560
Year 6-10	3800	4,608	5,086
Year 11-15	3,040	3,089	3,040

- 2.6 Table 4 shows how both option A and B perform allowing a comparison against the different ways to assess housing supply set out in Table 3.

*Table 4 Options with Symondshyde (A) and without Symondshyde (B)*

Plan period	Option A	Option B
Years 1-5	4,470	5,046
Year 6-10	5,541	5,501
Year 11-15	2,854	2,157
2016-36	15,379	15,218

- 2.7 Option A performed best in terms of delivery in the middle and last five years and the settlement strategy but less well in terms of the five year land supply whilst option B performs better in terms of the five year land supply on adoption but poorly in terms of the last five years of the plan period and results in disproportionate growth in some settlements in particular Stanborough.
- 2.8 Option B is also dependent on some sites which the Inspector has indicated should only come forward if there is a genuine local need for additional housing that cannot be met within the settlement. In the case of BrP1 and HS24 (BrP7) the inclusion of these sites

would exceed both the minimum natural growth requirement and the proportionate requirement (by 64% in the case of Brookmans Park) and therefore it is considered Option B would be found unsound. However, Option A would also be likely to be found unsound as it would not deliver a five year land supply when under the alternative approach and Liverpool approach there is the potential to provide one.

- 2.9 Options C and D were identified which sought to improve the performance of A and B. Option C being a variant of Option B and Option D a variant of Option A. It is Option C and D that are discussed in this report at a Parish/Settlement level.
- 2.10 It is evident from this analysis that the reduction in size of Birchall Garden Suburb along with the option of removing Symondshyde has a significant impact on delivery of sites in the last five years of the plan period. In paragraph 41 of his Supplementary Report EX272 the Inspector has advised that the inclusion of some sites that would have long lead in times, such as where mineral extraction is a requirement or site access, or assembly is complicated, would assist the phasing of the plan's housing delivery over a longer period.
- 2.11 There are few sites in Option B where such circumstances exist. BrP4 HS22 with the requirement to provide a new footbridge over the railway line could delay the delivery of housing to the middle and last five years of the Plan period. Similarly the group of sites Wel1, 2, 6 and 15 which require the construction of a new bridge could similarly be delayed to the middle part of the plan period. However these adjustments would still leave a significant shortfall in the last five years. As a consequence, Symondshyde has been included in both options with option C having more limited growth during the plan period and the remainder of the settlement coming forward after the end of the plan period.

*Table 5 Refined Options*

Plan period	Option C	Option D
Years 1-5	4,779	4604
Year 6-10	5,409	5596
Year 11-15	2,657	2,907
2016-36	15,359	15,614

## Options

- 2.12 The following settlement sections of this report refer to Options C and D as the refined options for the selection of sites. Table 6 shows a breakdown of the Options by settlement.

*Table 6 Options Analysis*

Settlement	Option A	Option B	Option C	Option D
Welwyn Garden City	6,525	6,525	6,525	6,525
Hatfield	3,596	3,596	3,596	3,596
Woolmer Green	227	286	261	261
Oaklands & Mardley Heath	86	86	86	86
Welwyn	254	502	502	254
Digswell	104	140	124	104
Lemsford	0	27	27	0
Stanborough	19	117	19	19
Welham Green	368	556	556	441
Brookmans Park & Bell Bar	421	828	724	549

Little Heath	104	204	104	104
Cuffley	409	585	585	409
Symondshyde	1500	0	500*	1500
Rural Areas	84	84	84	84

*Notes: Option C includes 500 homes at Symondshyde with the remaining 1000 to delivered outside of the plan period, beyond 2036*

- 2.13 The Inspector in his supplementary report has concluded that the potential to meet the borough's development needs in or adjacent to the two main towns and within the excluded villages, has been largely exhausted.
- 2.14 Therefore, the remainder of the housing requirement, for the most part, must be met in locations adjacent to the excluded villages, possibly supplemented by the release of land for the construction of a new village at Symondshyde.
- 2.15 This addendum does not have settlement sections relating to Welwyn Garden City or Hatfield as there are no further opportunities to be considered.

### Strands of Evidence and Appraisals

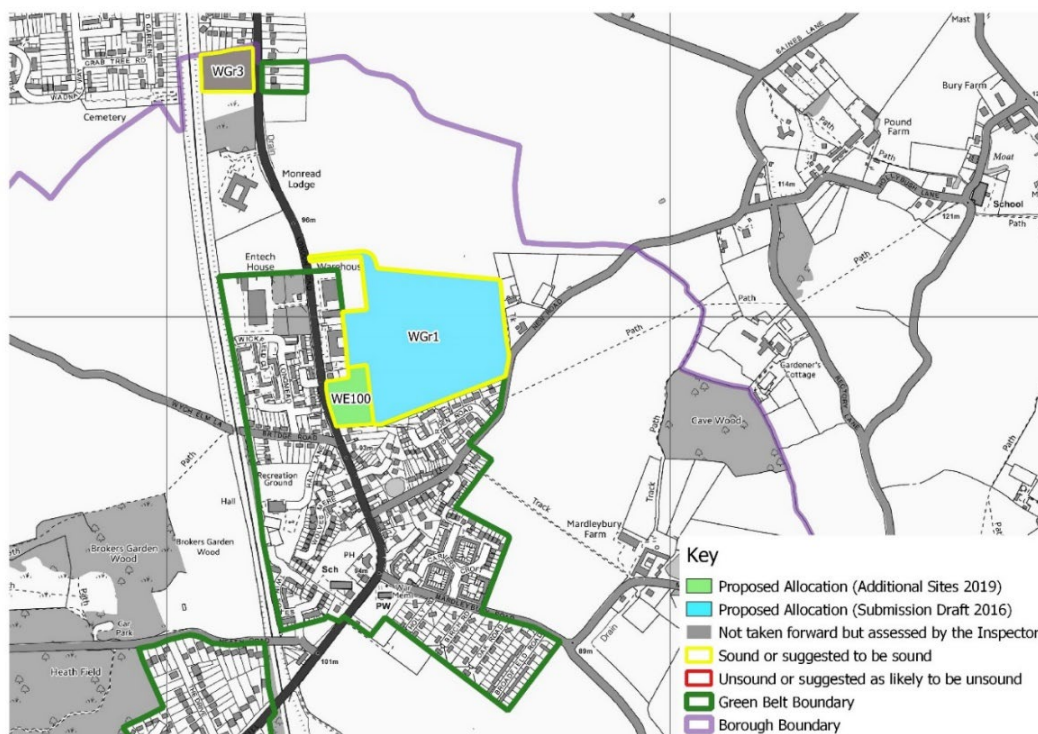
- 2.16 Details on the evidence that has informed site selection throughout the Plan is set out in methodology sections of the Housing Sites Selection Background Paper 2016 and 2019.
- 2.17 The Inspector in his Supplementary Conclusions and Advice notes that sustainability is particularly important both in respect of both the amount available and in the access to facilities, as well as the opportunities to make journeys in a sustainable way and thereby minimise the need to travel by the private car. The methodology has been updated to incorporate additional criteria related to Locational Accessibility as set out below in Table 7.

*Table 7 Locational Accessibility Weighting*

Locational Accessibility	Weighting
Within walking distance (400m) of any of the following: a train station, bus stop with 7 day a week service, a primary school, community facility and convenience shop.	Significant in favour
Within walking distance (800m) of any the following: good transport link (train station or bus stop with 7 day a week service), primary school, community facility or a convenience shop.	Moderate in favour
Within walking distance (1600m) of at least two of the following: transport link, community facility or convenience shop.	Minor in favour
Within cycling distance (5km) of a train station, bus stop with 7 day a week service, a primary school, community facility or convenience shop.	Neutral

### 3 Woolmer Green

- 3.1 Woolmer Green falls into the fourth tier of settlements in Policy SP3: Settlement Hierarchy of smaller villages excluded (inset) from the Green Belt located in the north of the borough.



#### Local Need for natural growth and proportional distribution

- 3.2 The table below sets out what needs to be delivered in Woolmer Green to meet the local need and a proportionate distribution of FOAHN.

Table 8 Natural growth and proportion of FOAHN at Woolmer Green

Natural Growth	Proportionate FOAHN
43	201

#### Completions and commitments at Woolmer Green

- 3.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed (commitments) form part of the borough’s housing supply towards meeting the FOAHN. Table 9 shows the completions and commitments at Woolmer Green.

Table 9 Completions and commitments at Woolmer Green

Completions 2016 - 2020	6
Commitments at 31 March 2021	71
Total	77

- 3.4 The completions and commitments total 77 dwellings, meaning Woolmer Green has already delivered or will be delivering dwellings to accommodate natural growth in the settlement. An additional 124 dwellings would need to be delivered to meet the

proportionate FOAHN figure.

### Allocations found sound by the Inspector

- 3.5 There was one site proposed for allocation in the Draft Local Plan 2016 for Woolmer Green, totaling 150 dwellings, which has been examined by the Inspector and has been indicated as a 'sound' allocation. This site HS15 (WGr1) is in the Green Belt. This is shown below in table 10.

*Table 10 Sites proposed for allocation at Woolmer Green*

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

- 3.6 The Inspector noted that the principle of development at site HS15 was sound but would be subject to the demonstration of exceptional circumstances for the remove of the site from the Green Belt. Following the Stage 9 Hearing Sessions the Inspector in paragraph 29 of his report (EX273) expressed concerns about the use of land in the critical gap between Woolmer Green and Knebworth to provide a vehicular access to the site from London Road.
- 3.7 The site proposed for allocation in 2016, HS15 (150 dwellings), together with the completions and commitments, (77 dwellings) total 227 dwellings. This is more than both the natural growth requirement and the proportional requirement, albeit not significantly.

### Additional sites examined by the Inspector

- 3.8 The 2019 site selection process considered four additional sites along with the original Local Plan sites listed in table 10 above. None of the additional sites failed the HELAA stages (Stages 1 and 2) but only two of the sites passed Stage 3 assessment to be found suitable for allocation.
- 3.9 The site WGr3 would lead to 'high' harm if allocated in its entirety, but the Stage 3 Green Belt Study identified that limiting development to the northern part of the site, and so restricting development to 25 dwellings, would reduce the harm to 'moderate'. Whilst the site passed the site selection process and found suitable for allocation by officers, members decided not to submit the site for consideration in the examination due to concerns about development in the gap between Woolmer Green and Knebworth.
- 3.10 WE100 is an urban site and therefore would lead to no Green Belt impacts. The site is vacant but in a proposed employment area. The site was considered appropriate for development and submitted to the examination.
- 3.11 The Inspector chose to examine all the sites that passed the Council's site selection process in 2019 as well as those which had not been submitted to the examination in order to test the soundness of the decision made. The Inspector raised concerns about the justification of exceptional circumstances to remove sites from the Green Belt in the context of the comparative harm to the Green Belt and the relative sustainability of alternative sites. The Inspector therefore examined two additional sites at Woolmer Green during the Stage 9 hearing sessions only one of which had been submitted by the Council as an additional site in November 2020. These sites are set out in Table 11.

Table 11 Additional Sites Examined at Woolmer Green

HELAA 2019 (Site Ref)	Site Location	Urban/ Green Belt	Number of Dwellings
WE100	51-53 London Road, Knebworth	Urban	34
WGr3	Land at 52 London Road	Green Belt	25
Total			59

### Option Analysis

- 3.12 Option B: Both WGr1 and WE100 allocated.
- 3.13 Option C & D: Either site WGr3 or WE100 allocated to improve the housing supply in the first five years of the Plan. The site analysis below considers which of the two sites should be selected.
- 3.14 WGr3 would result in moderate harm to the Green Belt and development would be located within the fragile gap between Woolmer Green and Knebworth. As noted it could be possible to screen the site and limit the extent of development. The site is located at the edge of Knebworth which has a range of facilities and services including a train station in walking distance.
- 3.15 WE100 is an urban site so would result in no further harm to the Green Belt by virtue of developing a brownfield site. Development of this site could provide a primary access to HS15 and rescind the need for the northern Green Belt vehicular access to HS15, thus reducing the impact on the Green Belt.

### Site Analysis

#### WE100 - 51-53 London Road, Knebworth

- 3.16 This site is located within the proposed employment area at Woolmer Green (EA10). The employment area indicates land which is designated for Class B and associated land uses only. The Inspector notes that proposals to use sites in such areas, some of which have buildings that could be reused for B or related uses, for housing, would be contrary to Policy SP8 and Policy SADM 10, both of which have already been found to be sound through the examination process.
- 3.17 The Inspector concludes that it is therefore not appropriate to allocate sites within this area for residential development in the Local Plan, unless there are sound planning reasons that are specific to the site or location. It has been indicated that if this site were to provide access to HS15 to allow for the northern access to that site to be used only as cycle access after construction of the site.
- 3.18 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site WE100 is included below.

Site Selection Summary – Weighting	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 0-5 years (significant in favour)</li> <li>• GB3 Study (Purposes/Harm)/ Green Belt boundary: N/A The site is urban. Development would have no impact on Green Belt purposes or boundaries (significant weight in favour)</li> <li>• SA: The site has over three times as many double positives as double negatives (significant in favour)</li> <li>• Flood Risk: Passes the sequential test</li> <li>• Landscape Assessment: N/A (significant in favour)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: The current employment generating uses on the site would be lost as would the potential future of the site to support employment</li> </ul>
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### Further considerations

#### *Five year land supply and delivery*

- 3.19 As considered in the HELAA 2019 that development site WE100 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the first five years. <u>(Significant in favour)</u></li> </ul>
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#### *Locational Accessibility*

- 3.20 Site WE100 is within walking distance of shops and other local facilities within Woolmer Green as well as being within 400m of two bus stops with a regular service.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of bus stops and 800m of a train station. <u>(Significant in favour)</u></li> </ul>
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#### *Policy Considerations*

- 3.21 Site WE100 is an urban site, and therefore would lead to no Green Belt harm arising from development. The site is currently in a proposed employment area, although the site is not primary B class, the Inspector has noted it is not appropriate to allocation employment sites for residential use without sound planning reasons. The site could deliver an access to site HS15 which would allow the northern access to that site to be demoted to a secondary cycle access and therefore would reduce the impact of site HS15 on the Green Belt. As noted above the lack of harm to the Green Belt has significant weight in the consideration of this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• Access to be provided to site HS15.</li> </ul>
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**WGr3 – Land at 52 London Road, Knebworth**

- 3.22 Site WGr3 was not submitted to the examination by the Council due to the sites location between Woolmer Green and Knebworth and concerns about the fragile gap between them.
- 3.23 It was clarified at the session that the site had been found suitable through the Site Selection process 2019 on the basis that the built development would not extend any further south than that on the last property on the eastern side of London Road and the reduced site would accommodate 25 dwellings. It has been noted that any development could be screened from views along London Road.
- 3.24 The Inspector notes that the reduced site does not intrude into the gap between the northern extent of the built-up area of Woolmer Green and the corresponding southern extent of Knebworth. It has also been concluded that there is no reason to dispute the finding of moderate harm to the Green Belt and that in the context of the need to release land from the Green Belt, some of which is of a higher harm rating, Green Belt and related matters are not a valid reason to reject this site.
- 3.25 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site WGr3 is included below.

<p>Site Selection Summary – Weighting</p>	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 1 -10 years (moderate in favour)</li> <li>• GB3 Study (Purposes): The wider parcel of land makes a significant contribution to one national purpose, a partial contribution to one national purpose and a limited or no contribution to one national purpose (moderate against).</li> <li>• GB3 Study (Harm): The release of sub-parcel P3b would result in moderate harm to the Green Belt (minor against) with the presence of a woodland block to the southern half of the site and housing across the B197 to the east creating a degree of separation from the wider countryside and a stronger association with the settlement edge.</li> <li>• Green Belt boundary: The amended green belt boundary would be predominately weaker than the existing but would be clearly defined (moderate against)</li> <li>• SA: Identifies 7 positives and 2 significant negatives, i.e. more than 3 times double positives than double negatives (significant in favour)</li> <li>• Flood Risk: Passes the sequential test.</li> <li>• Landscape Assessment: Moderate-High (moderate against)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None</li> </ul>
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**Further considerations**

*Five year land supply and delivery*

- 3.26 It is now considered that development of site WGr3 could come forward in the first five years of the plan and so is updated from moderate weight to a significant weight in favour of the allocation of this site.

<p>Further Considerations – Weighting</p>	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the first five years. <u>(Significant in favour)</u></li> </ul>
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### *Locational Accessibility*

- 3.27 The sustainability of site WGr3 was discussed during the Hearing Sessions and it was noted that the site is within walking distance of shops and other facilities in Knebworth as well as the railway station, which has frequent train services. Bus services serve the area at fifteen-minute intervals to Stevenage, Welwyn Garden City, Hatfield and St Albans. The highway authority noted that from a movement perspective, the site is in a sustainable location for development.

Further Considerations– Weighting	<ul style="list-style-type: none"><li>• Locational Accessibility: Site is within 400m of bus stops and 800m of a train station. (<u>Significant in favour</u>)</li></ul>
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### *Policy Considerations*

- 3.28 As noted above site WGr3 was reduced in size to limit development to the northern part of the site which would reduce the harm to the Green Belt to 'moderate'. At the hearing session the inspector considered the extent to which harm could be mitigated, as outlined it could be possible to screen the site and limit the extent of development to a capacity of 25 dwellings to lessen the harm to the Green Belt which would be a minor negative weight to the allocation of this site.
- 3.29 Should this site be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"><li>• Green Belt (mitigation): A strong landscape buffer will be required to screen development from the wider Green Belt to the south.</li></ul>
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### **Settlement Summary**

#### **Key Infrastructure Issues**

- 3.30 The Site Selection Background Paper 2019 details the key infrastructure issues facing Woolmer Green. Nothing significant was identified and the Council is not aware of any changes to this information.

#### **Settlement Strategy Implications**

- 3.31 Woolmer Green is currently designated as a 'small excluded village and settlement' which is a 4th tier settlement in the settlement hierarchy where there is a limited range of employment opportunities and services. The settlement is excluded from the Green Belt and is identified as being appropriate for a limited amount of development compatible with the scale and character of the village. The allocation of the two additional sites would increase the number of dwellings to be delivered over the natural growth and proportional distribution for Woolmer Green.

### **Summary / Conclusions**

- 3.32 Whilst the level of development included in both Options C and D are above the proportionate figure there are advantages to delivering both sites, one of which is in a brownfield site and the other limited to moderate harm to the Green Belt and both which would contribute to the five year housing land supply.
- 3.33 Both sites are considered to be within sustainable locations for development WGr3 is within walking distance of a train station at Knebworth, and the shops in Knebworth

which is one of the largest villages in North Hertfordshire and is the equivalent of a tier 3 settlement with a station.

- 3.34 As discussed, both Options have considered the proposal of either WGr3 or WE100, as well as the relative benefits of both sites. As noted WE100 as an urban site is in a sequentially preferable location which would result in no harm to the Green Belt but would result in the loss of employment land, the site is in a sustainable location and could provide an access to site HS15 (WGr1) to reduce the impact on the Green Belt from development of that site. Whereas WGr3 would result in moderate harm to the Green Belt but is located at the edge of Knebworth and in walking distance of a range of services including the train station.
- 3.35 Neither site is required to meet local need and therefore should only come forward if required to meet the FOAHN. Unlike many sites in tier 3 and 4 settlements both are accessible to public transport.
- 3.36 On balance whilst WE100 would result in the loss of employment land it would help to minimize the harm to the Green Belt arising from the allocation of HS15 and therefore is considered to provide benefits which outweigh the loss of employment land and therefore it is recommended it should be preferred over WGr3. As such it is recommended that in both Options C & D that only site WE100 is selected.

## 4 Welwyn Parish Settlements

### Introduction

- 4.1 The Parish of Welwyn comprises the settlements of Welwyn, Digswell and Oaklands and Mardley Heath. The Inspector identifies the settlements within the Welwyn Parish area as lacking in housing numbers and comments on the sustainability of Digswell because it has a station.
- 4.2 Both local need and what is the proportionate distribution of the FOAHN is being taken into account to consider what would be a reasonable approach to distributing growth to the borough's towns, excluded villages and rural areas.
- 4.3 The table below sets out what needs to be delivered in Welwyn Parish to meet the local need and a proportionate distribution of FOAHN.

*Table 12 Natural growth and proportion of FOAHN Welwyn Parish*

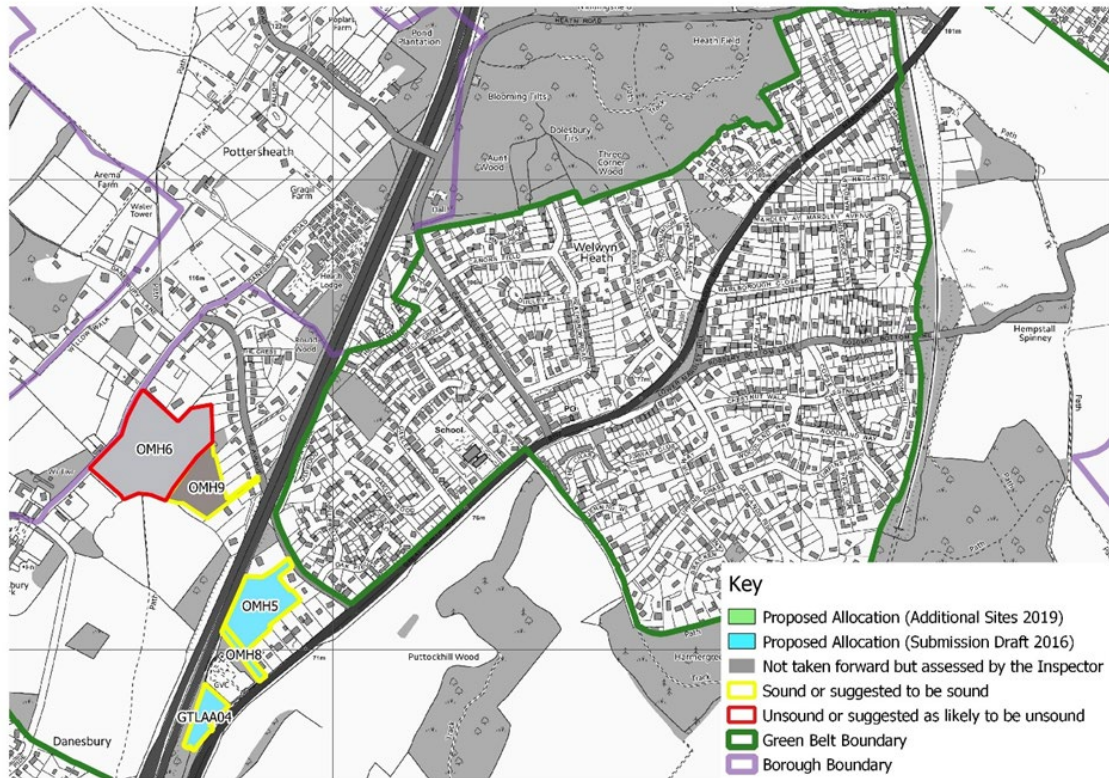
Settlement	Natural Growth	Proportionate FOAHN
Welwyn	112	490
Digswell	47	206
Oaklands and Mardley Heath	89	413
Parish Total	248	1109

- 4.4 Each settlement will be discussed individually in this assessment.
- 4.5 Completed developments after 2016 and proposals with valid consents but have yet to be completed (commitments) total 239 dwellings at Welwyn Parish.
- 4.6 As discussed in the forthcoming settlement sections, the Inspector has concluded that proposed allocations at Welwyn Parish totaling 94 dwellings are sound. Completed development, commitments and sound allocations total 333 dwellings at Welwyn Parish.

## 5 Oaklands and Mardley Heath

### Introduction

- 5.1 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 Welwyn.



### Local Need for natural growth and Proportional distribution

- 5.2 The table below sets out what needs to be delivered in Oaklands and Mardley Heath to meet the local need and a proportionate distribution of FOAHN.

*Table 13 Natural growth and proportion of FOAHN at Oaklands and Mardley Heath*

Natural Growth	Proportionate FOAHN
89	413

### Completions and commitments at Oaklands and Mardley Heath

- 5.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed (commitments) form part of the borough's housing supply towards meeting the FOAHN. Table 14 shows the completions and commitments at Oaklands and Mardley Heath.

*Table 14 Completions and commitments at Oaklands and Mardley Heath*

Completions 2016 - 2020	19
Commitments at 31 March 2021	11
<b>Total</b>	<b>30</b>

- 5.4 The completions and commitments total 30 dwellings, meaning Oaklands and Mardley Heath would need to accommodate between 59 and 383 additional dwellings.

#### **Allocations found sound by the Inspector**

- 5.5 There are three sites proposed for allocation in the Draft Local Plan 2016 for Oaklands and Mardley Heath, totaling 31 dwellings, which has been examined by the Inspector. The sites are shown below in table 15.

*Table 15 Sites proposed for allocation 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
HS17	OMH5	Land rear of 2a Great North Road	Green Belt	20
HS32	GTLAA04	Four Oaks, Great North Road	Green Belt	6 pitches
Total				31

- 5.6 The sites proposed for allocation in 2016 (31 dwellings), together with the completions and commitments (30 dwellings) total 61 dwellings. This is less than both the minimum natural growth requirement and the proportional distribution.

#### **Additional sites examined by the Inspector**

- 5.7 The 2019 site selection process considered three additional sites along with the original Local Plan sites listed in table 15 above. 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. Following the detailed Stage 3 assessment, none of the additional sites were considered appropriate for allocation.
- 5.8 OMH7 did not pass the Site selection process as it had only been found suitable for 2 dwelling, making it too small for allocation as part of the Local Plan.
- 5.9 OMH6 failed the HELAA due to the lack of suitable access along Danesbury Park Road. It was noted that safe and suitable access to the site for pedestrians could not be achieved and the site's location is unlikely to support any modal shift away from the car or encourage movements by sustainable transport modes.
- 5.10 OMH9 was found suitable for 12 dwellings, however, when assessed in the Stage 3 assessment against the Council's Green Belt evidence the site was found unsuitable for allocation. In both the North Hertfordshire District Plan and the Welwyn Hatfield Local Plan the Green Belt boundary in this area is defined by the A1(M). The Green Belt Stage 3 Study considered this to represent a strong boundary and assessed Parcel 15 which covers this area as 'moderate - high' harm if the parcel were released from the Green Belt.
- 5.11 However, due of the absence of any proposed housing development in Digswell and with only the limited provision of 31 dwellings at Oaklands/Mardley Heath, which the Inspector considered is contrary to the strategy set out in Policy SP3 in the submitted Plan, the Inspector examined the additional sites promoted to the Council in this area.

*Table 16 Additional Sites Examined at Oaklands and Mardley Heath*

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
OMH6	. Land adjacent to Danesbury Lodge	Green Belt	Not specified
OMH7	22 the Avenue	Green Belt	2
OMH9	Land r/o 19-23 The Avenue	Green Belt	25*
Total			27

Notes: OMH9 found suitable for 12 dwellings (HELAA 2019), increased to 25 following the Stage 9 Hearings.

### **Option Analysis**

- 5.12 Both Option C and Option D include the allocation of OMH9 for 25 dwellings. A new Green Belt boundary will need to be established in this area. If this area is excluded from the Green Belt then as a small site an allowance for OMH7 could be included for two dwellings.

### **Site Analysis**

#### **OMH6 and OMH9**

- 5.13 The Inspector noted that this area does not make a strong contribution to any Green Belt purposes. The Inspector has also concluded that an alternative boundary could be established which is similarly permanent to the current boundary (the A1M).
- 5.14 The Inspector also noted that both sites have access problems along both The Avenue and Danesbury Park Road. The Avenue does not have footpaths on much of its length beyond the A1(M) whilst Danesbury Park Road has none. It is also noted that the area currently presents a range of challenges and barriers to sustainable travel and this is further hindered by the distances and topography with the nearest schools being beyond a walkable distance although the local facilities are cyclable, they are beyond the distance that most people would walk.

#### **Access**

- 5.15 The County Council have advised in Examination Document (EX251) that due to the access width to OMH9 it could be possible to deliver a development of up to 25 dwellings.
- 5.16 In paragraph 40 of the Inspectors report (EX273) the inspector noted that there may be the opportunity to allow for an appropriate access to site OMH6 via site OMH9 which would allow for a comprehensive development proposal to be delivered.
- 5.17 The landowners of OMH9 and OMH6 agreed to work together to deliver a comprehensive scheme on the land allowing access through OMH9 to OMH6.
- 5.18 A Traffic Report has been submitted by the landowners which proposed that 50 dwellings may be achievable on the combined land. However, the County Council have advised that this specific proposal is unlikely to be deliverable due to the constraints on access and therefore no additional capacity has been identified on this land.
- 5.19 The Site Selection 2019 assessed the advantages and disadvantages of sites being

considered for allocation. A summary of the site selection assessment for OMH9 is included below:

Site Selection Summary – Weighting	<ul style="list-style-type: none"> <li>• HELAA: Deliverable in 1-5 years (<u>significant in favour</u>).</li> <li>• GB3 Study (Purposes): Partial contribution to one national purpose and limited or no contribution to two national purposes (<u>minor in favour</u>).</li> <li>• GB3 Study (Harm): Site falls within a moderate-high parcel (P15) (<u>moderate against</u>).</li> <li>• Green Belt boundary: New boundary would be predominantly weaker than the existing boundary and would be clearly defined (<u>moderate against</u>).</li> <li>• SA: The site has more than two times as many significant positives as significant negatives (<u>moderate in favour</u>).</li> <li>• Flood Risk: The site passes the sequential test.</li> <li>• Landscape Assessment: Low (<u>significant in favour</u>)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None</li> </ul>
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### Further considerations

#### *Five Year Land Supply and Delivery*

- 5.20 As noted in the HELAA 2019 it is considered that development of site OMH9 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site. The increase in capacity will not affect the ability of the development to come forward in this timescale.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the first five years. (<u>Significant in favour</u>)</li> </ul>
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#### *Locational Accessibility*

- 5.21 The Inspector has noted that the area currently presents a range of challenges and barriers to sustainable travel and which is further hindered by the distances and topography required to travel from this area. Although all of the sites examined are within a walkable distance to the bus stops on Great North Road, where there is a frequent bus service, the absence of footpaths for most of the distances west of the A1(M) would be a deterrent to walking, although given land ownership of the site it may be possible to deliver footpaths to link the site access to existing footpaths at the underpass of the A1(M). The nearest schools are beyond a walkable distance and although the local facilities are cyclable they are beyond the distance that most people would walk.

Further Considerations – Weighting	<p>Locational Accessibility: Site is within 800m of bus stops and 1200m of a neighbourhood centre including a convenience store. (<u>moderate in favour</u>)</p>
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#### *Green Belt*

- 5.22 All of the additional sites and the wider area along the western stretch of The Avenue were included in Parcel P15 in the Green Belt Stage 3 Study, the study assessed this area as a 'Moderate-High' harm parcel. It was noted that the surrounding area along The Avenue already contains urbanising development and the release of this parcel would result in the breach of the strong boundary created by the A1(M).

- 5.23 If site OMH9 were to be allocated then a new Green Belt boundary would need to be created in this area and a wider area than just the site boundary would need to be removed from the Green Belt to form this, this would include land in site OMH6 but as noted above development of this site is not considered deliverable. At the hearing session the Inspector considered the extent to which the harm could be mitigated and in his report the Inspector considered that Danesbury Park Road, as a historic road, could form a satisfactory Green Belt boundary.
- 5.24 The Inspector also notes in paragraph 37 of his report (EX273) that the land within OMH6 to the west of the public footpath which runs through the site has a separate relationship to the land along The Avenue and that the release of land to the west of the footpath would cause greater harm to the wider Green Belt.
- 5.25 A revised Green Belt boundary shown below.



- 5.26 Should the site be allocated for development and removed from the Green Belt the following policy considerations for site OMH9 is considered necessary:

Policy Considerations	<ul style="list-style-type: none"> <li>• Provision of footpath to join existing footpaths at A1(M) underpass.</li> <li>• Green Belt boundary to be strengthened through planting within the site</li> </ul>
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## Settlement Summary

### Key Infrastructure Issues

- 5.27 The 2019 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. The infrastructure information provided at the time is considered to be up to date and the level of potential additional dwellings at Oaklands and Mardley Heath (88 dwellings if site OMH9 were to come forward and OMH7 included as a small site) is not considered to have a significant impact on service



delivery in this area.

### **Settlement Strategy Implications**

- 5.28 Oaklands and Mardley Heath is currently designated as a 'small excluded village and settlement' which is a 4<sup>th</sup> tier settlement in the settlement hierarchy where there is a limited range of employment opportunities and services. The settlement is excluded from the Green Belt and is identified as being appropriate for a limited amount of development compatible with the scale and character of the village. It is one of 3 settlements excluded from the Green Belt which lie within the Welwyn Parish area and which the Inspector has identified as being in more need of housing development.

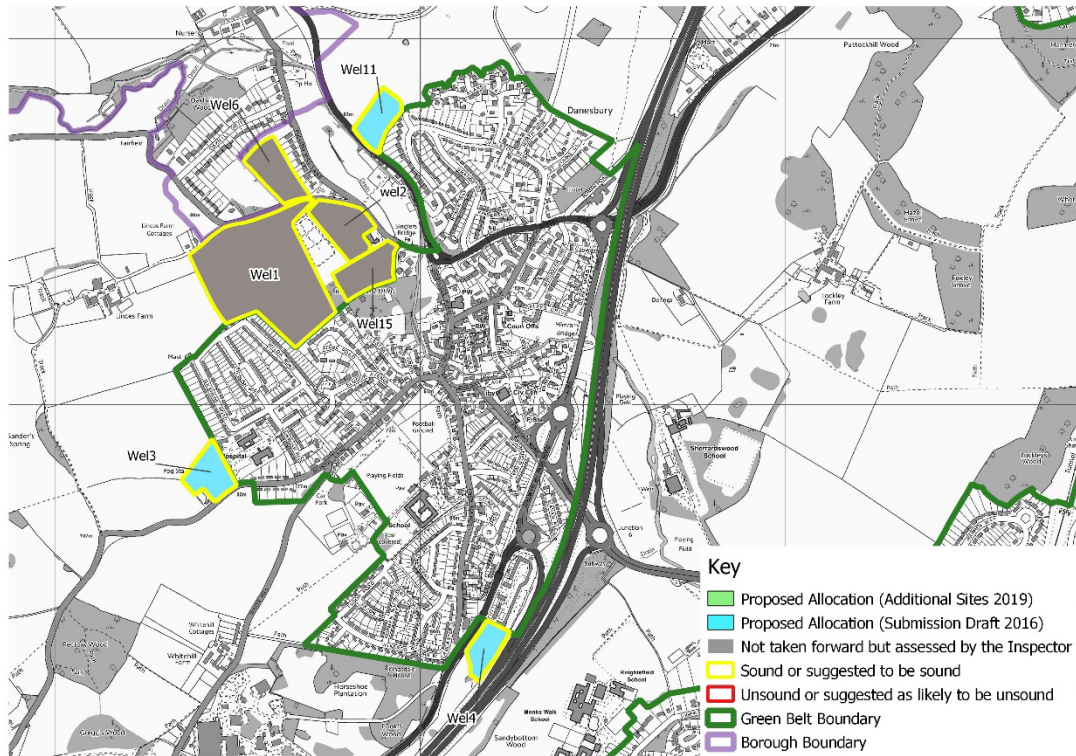
### **Summary / Conclusions**

- 5.29 Given the scale of growth proposed and the fact that the level of growth proposed in the Draft Plan doesn't meet the minimum local need figure the allocation of site OMH9 for 25 dwellings is included in both Option C and D inspite of the issues with sustainable travel and access . In addition it would moderately increase the number of dwellings to come forward in the Welwyn Parish area as well as contribute to the five year land supply. This would result in the delivery of 88 dwellings in Oaklands and Mardley Heath which is broadly in line with the natural growth target (89 dwellings) and considerably below the proportionate number (413 dwellings).
- 5.30 In light of the Inspector's conclusions in EX273 and his conclusion on the harm to the Green Belt and the need for additional development in Welwyn Parish it is considered that exceptional circumstances exist for the allocation of this site.

## 6 Welwyn

### Introduction

- 6.1 Welwyn is a village that falls within the third tier of the settlements in Policy SP3: Settlement Hierarchy. Identified as a “Large Excluded Village” it is a village not in the Green Belt with a service centre but a more limited range than the two towns. It is a secondary focus for new development where this is compatible with the scale and character of the village, and the maintenance of the Green Belt boundaries. It is the only tier 3 settlement without a station.



### Local Need for natural growth and Proportional distribution

- 6.2 The table below sets out what needs to be delivered in Welwyn to meet the local need and a proportionate distribution of the FOAHN.

*Table 17 Natural growth and proportion of the FOAHN at Welwyn*

Natural Growth	Proportionate OAN
112	490

- 6.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough’s housing supply towards meeting the FOAHN. Table 18 shows the completions and commitments at Welwyn.

*Table 18 Completions and commitments at Welwyn*

Completions 2016 - 2020	156
Commitments at 31 March 2021	29
<b>Total</b>	<b>185</b>

- 6.4 After completions / commitments (185) the natural growth requirement is exceeded. To achieve the proportionate FOAHN requirement (490), an additional 305 dwellings is required.

#### **Allocations found sound by the Inspector**

- 6.5 Three sites were proposed for allocation in the Draft Local Plan 2016 for Welwyn, totaling 69 dwellings. These have been examined by the Inspector and found to be sound. These sites are shown in table 19.

*Table 19 Sites proposed for allocation 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	9
Total				69

- 6.6 When completions/commitments (185) and sound allocations (69) are considered the total dwellings (254) is less than the proportionate requirement (490) but higher than the minimum natural change requirement. An additional 236 dwellings would be required to achieve the proportionate requirement.

#### **Additional sites examined by the Inspector**

- 6.7 The Inspector examined an additional four sites all of which were considered sound or could be sound. These sites are set out in Table 20.

*Table 20 Additional Sites Examined at Welwyn*

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
Wel1	Land at Kimpton Road	Green Belt	178
Wel2	Land adjoining Welwyn Cemetery	Green Belt	40
Wel6	Land at Kimpton Road	Green Belt	16
Wel15	Fulling Mill Lane	Green Belt	14
Total			248

- 6.8 Completions/commitments (185), sound allocations (69) and the additional sites (248) would result in up to 502 dwellings. This would exceed the number of dwellings over the proportional requirement of 490 dwellings by 12 dwellings (2.4%).

## Option Analysis

- 6.9 Option C: Proposes the addition of the four sites Wel1, 2, 6 and 15, located off Fulling Mill Lane. These additions together with commitments, completions, and existing allocations would result in 502 dwellings.
- 6.10 Option D: Proposes no additional housing sites in Welwyn. Commitments, completions, and existing allocations would result in 254 dwellings

## Site Analysis

### Wel1, 2, 6 and 15 Land at Fulling Mill Lane and Kimpton Road

- 6.11 The development of any of Wel1, 2, 6 and 15, located off Fulling Mill Lane, would require the construction of a new bridge over the river Mimram and improvements to the adjacent junction with the B656. The owners of Wel1, 2 and 15 are promoting their sites in combination to achieve a viable development.
- 6.12 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site each site is included below.

Wel1	
Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable in 6-10 years (moderate in favour)</li> <li>• GB3 Study (Purposes): Significant in contribution to P3. Limited or no contribution for the other purposes (moderate against)</li> <li>• GB3 Study (Harm): Both Parcel 7 and Parcel 7a, as considered by the Green Belt Study would lead to Moderate-high impact if the site is released (moderate against)</li> <li>• Green Belt boundary: The amended Green Belt boundary would be slightly weaker in parts than existing, but clearly defined (minor in favour)</li> <li>• SA: There are 5 significant positives compared to 3 significant negatives in terms of impact (minor in favour)</li> <li>• Flood Risk: The site passes the Sequential Test</li> <li>• Landscape Assessment: Low – Moderate/ Moderate (moderate in favour)</li> <li>• Strategic Advantages: The site, in combination with adjoining sites Wel2, Wel6 and Wel15, could be instrumental in assisting the funding and delivery of highway upgrades and a new 2-way vehicular bridge over the River Mimram coming forward and the provision of new car parking for the cemetery.</li> <li>• Strategic Disadvantages: None</li> </ul>

Wel2	
Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable in 1-10 year (moderate in favour)</li> <li>• GB3 Study (Purposes): 1 purpose Significant Contribution: (P3) (moderate against)</li> <li>• GB3 Study (Harm): Both Parcel 7 and Parcel 7a, as considered by the Green Belt Study would lead to Moderate-high impact if the site is released Moderate-high (moderate against)</li> <li>• Green Belt boundary: Green Belt boundary would be similar in strength to existing (minor in favour)</li> <li>• SA: There are 5 significant positives compared to 3 significant negatives in terms of impact (minor in favour)</li> <li>• Flood Risk: Passes the Sequential Test Access and egress will need to be revisited at application stage due to flooding on Fulling Mill Lane</li> <li>• Landscape Assessment: Low – Moderate/ Moderate (moderate in favour)</li> </ul>

	<ul style="list-style-type: none"> <li>• Strategic Advantages: The site, in combination with adjoining sites Wel2, Wel6 and Wel15, could be instrumental in assisting the funding and delivery of highway upgrades and a new 2-way vehicular bridge over the River Mimram coming forward and the provision of new car parking for the cemetery.</li> <li>• Strategic Disadvantages: No strategic disadvantages</li> </ul>
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Wel6	
Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 6-15 years (moderate/minor in favour)</li> <li>• GB3 Study (Purposes): The site makes a significant contribution to one national purpose (moderate against)</li> <li>• GB3 Study (Harm): Parcel 7a is moderate-high harm (moderate against)</li> <li>• Green Belt boundary: Release of Parcel 7 would result in a Green Belt boundary which would be similar in strength (moderate in favour) and release of Parcel 7a would result in a partially weaker boundary but would be clearly defined (minor in favour).</li> <li>• SA: The site has more than two times as many significant positives than significant negatives (moderate in favour)</li> <li>• Flood Risk: Site passes the sequential test.</li> <li>• Landscape Assessment: Low – Moderate/ Moderate (moderate in favour)</li> <li>• Strategic Advantages: None.</li> <li>• Strategic Disadvantages: None.</li> </ul>

Wel15	
Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 0-10 years (moderate in favour)</li> <li>• GB3 Study (Purposes): This site contributes significantly to 1 purpose (P3) (moderate against)</li> <li>• GB3 Study (Harm): Both Parcel 7 and Parcel 7a, as considered by the Green Belt Study, would lead to Moderate-high impact if the site is released (moderate against)</li> <li>• Green Belt boundary: The Green Belt boundary will be no weaker than existing (minor in favour)</li> <li>• SA: The SA identifies 5 positives and 2 negatives (moderate in favour)</li> <li>• Flood Risk: Passes the Sequential Test. Access and egress will need to be revisited at application stage due to flooding on Fulling Mill Lane.</li> <li>• Landscape Assessment: Low – Moderate/ Moderate (moderate in favour)</li> <li>• Strategic Advantages: The site, in combination with adjoining sites Wel1, Wel2, Wel6 and Wel15, could be instrumental in assisting the funding and delivery of highway upgrades and a new 2-way vehicular bridge over the River Mimram coming forward and the provision of new car parking for the cemetery.</li> <li>• Strategic Disadvantages: None</li> </ul>

### Further considerations

#### *Five year land supply and delivery*

- 6.13 The promotor of Wel1, Wel2 and Wel15 considers some dwellings will come forward on these sites within the first 5 years of the plan period. However, it is considered that due to site constraints and infrastructure requirements delivery will more likely be between years 6-10. This is attributed moderate weight in favour of the sites

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>5YHLS: Delivery expected in years 6-10 (Moderate weight in in favour)</li> </ul>
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*Locational Accessibility*

- 6.14 The Inspector has advised he considers all four sites are sustainably located to access services and facilities although the western parts of Wel1 and Wel6 are probably not within walking distance of the primary school. The sites are within 400m of bus stops with access to a good range of services which is a significant weight in favour of the allocation of the sites.

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>Locational Accessibility: Sites are within 400m of bus stops <u>Significant in favour</u></li> </ul>
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*Green Belt*

- 6.15 The four sites were all assessed as contributing moderate-high harm to the Green Belt purposes (moderate against). As all sites were assessed the same there are not considered to be any comparable advantage of one site over another.

*Policy Considerations*

- 6.16 Should the four sites be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>Highway/Access: construction of a new bridge over the river Mimram and improvements to the adjacent junction with the B656.</li> <li>Wel1. The new Green Belt boundary will be reinforced through planting within the site.</li> </ul>
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- 6.17 The Inspector noted that, in terms of the impact of development on Singlers Marsh, (specifically construction of a new bridge over the river Mimram and the widening of Fulling Mill Lane) there is no evidence to suggest that the construction of a new bridge would be detrimental to the river’s water quality, or to the southern part of Singlers Marsh.
- 6.18 The Inspector observed that the presence of Singlers Marsh should not be an impediment to the sites being developed if there are not alternative sustainable Green Belt sites, with a lower harm rating that could meet the housing needs of the wider Welwyn area.
- 6.19 In conclusion the Inspector highlighted that it may be that the housing requirement at Welwyn does not justify the release of all of this land, which could potentially accommodate up to 250 dwellings. If only some is required, then consideration should be given to removing the most appropriate area for contributing to the long-term development needs of Welwyn from the Green Belt and safeguarding that which is not required for development during this plan period.

## Settlement Summary

### Key Infrastructure Issues

- 6.20 The Site Selection Background Paper 2019 details the key infrastructure issues facing Welwyn. The primary school could be expanded to accommodate an additional form of entry should it be required. A new bridge is required to access these sites. The promoter advises that in order for this to be viable the two largest sites Wel1 and Wel2 would need to come forward. A town and village Green application has been made for Singlers Marsh but is unlikely to be determined before Full Council consider the options for additional sites.

### Settlement Strategy Implications

- 6.21 Welwyn has a good village centre. While served by public transport there is no railway station. It is in the third tier of settlements, below only Welwyn Garden City and Hatfield. Accordingly, it is an appropriate location for development at a lower level than Hatfield, but more than the small, excluded villages such as Oaklands and Mardley Heath with their much narrower range of services and facilities. This general approach is of course subject to settlement character and other constraints and green belt harm. Welwyn does not have the opportunity for relatively low harm green belt release.

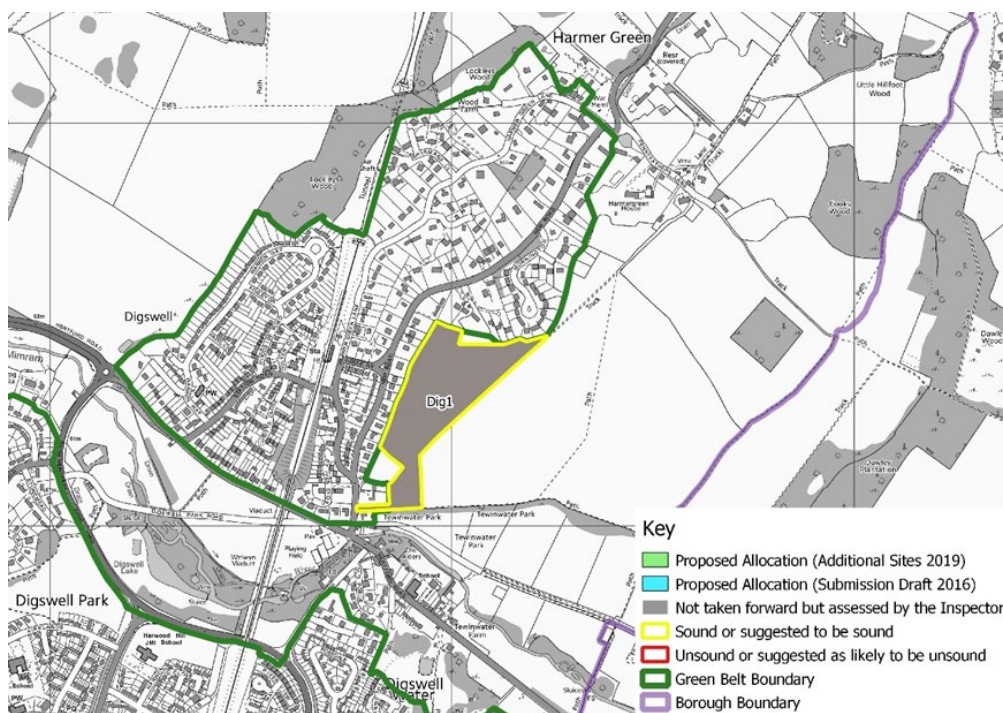
### Summary / Conclusions

- 6.22 Welwyn is a village that falls within the third tier of the settlements in Policy SP3: Settlement Hierarchy. It is a secondary focus for new development where this is compatible with the scale and character of the village, and the maintenance of the Green Belt boundaries.
- 6.23 The Inspector highlighted that it may be that the housing requirement at Welwyn does not justify the release of the four sites Wel1,2, 6 and 15 which would provide for approximately 250 dwellings. He went on to note that, if only some is required, then consideration should be given to removing the most appropriate area for contributing to the long-term development needs of Welwyn from the Green Belt and safeguarding that which is not required for development during this plan period.
- 6.24 As discussed, when completions/commitments (185) and sound allocations (69) are considered the total dwellings (254) is less than the proportionate requirement (490) but is higher than the minimum natural growth requirement. As discussed, to facilitate the necessary bridge and road widening the two largest of the four sites would be required. Wel1 would be the logical site to safeguard as it is the most remote from services and services but it is required to deliver the bridge. Therefore, an option for safeguarding land is not included.
- 6.25 **Option C:** Proposes the addition of the four sites Wel1,2, 6 and 15, located off Fulling Mill Lane. These additions together with commitments, completions, and existing allocations would result in 502 dwellings. This would exceed the number of dwellings over the proportional requirement of 490 dwellings by 12 dwellings (2.4%). It would also represent a 32% increase on existing dwellings.
- 6.26 **Option D:** Proposes no additional housing sites Welwyn. Commitments, completions, and existing allocations would result in 254 dwellings. This would mean the proportional requirement of 490 dwellings for Welwyn is not being met. This option would represent a 16% increase on existing dwellings.

## 7 Digswell

### Introduction

- 7.1 Digswell falls into the fourth tier of settlements in Policy SP3: Settlement Hierarchy of smaller villages excluded (inset) from the Green Belt located to the north of Welwyn Garden City. Welwyn North station is located in Digswell alongside a small number of shops, a primary school and several other community facilities. Villages with railway stations are noted by the Inspector as particularly sustainable locations for development (EX272).



### Local Need for natural growth and Proportional distribution

- 7.2 The table below sets out what needs to be delivered in Digswell to meet the local need and a proportionate distribution of FOAHN.

*Table 21 Natural growth and proportion of FOAHN at Digswell*

Natural Growth	Proportionate FOAHN
47	206

### Completions and Commitments

- 7.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough's housing supply towards meeting the FOAHN. Table 22 shows the completions and commitments at Digswell.

*Table 22 Completions and commitments at Digswell*

Completions 2016 - 2020	11
Commitments at 31 March 2021	13
<b>Total</b>	<b>24</b>



7.4 There were no sites allocated in the Draft Local Plan 2016 for Digswell. Therefore, there are only 24 dwellings coming forward in Digswell from completions and commitments and for Digswell to meet the local need or a proportionate distribution of the FOAHN a further 23 – 182 dwellings need to be delivered.

**Additional sites examined by the Inspector**

7.5 The 2019 site selection process considered 4 sites at Digswell. All of the sites failed the HELAA stage (2 sites failed stage 1 and two sites failed stage 2).

7.6 The two sites which failed the stage 1 (Dig3 and Dig5) did not adjoin the settlement boundary as excluded from the Green Belt.

7.7 The two sites considered at stage 2 were Dig1 and Dig4 which were both also found unsuitable in 2016.

7.8 Dig1 was found unsuitable for development due to the impact on heritage assets. It was considered that development of this site, due to its position in the setting of several heritage assets, would harm the significance of the grade II Tewin Water RPG, grade II\* Welwyn viaduct and the 6 further grade II listed buildings to the south

7.9 Dig4 was found unsuitable due to the site’s proximity to two significant noise sources, the East Coast railway line and the A1000, and as the site lies within the garden of a Grade II listed building (Digswell Water Mill) and is adjacent to the Grade II\* listed railway viaduct. It more closely relates to the settlement boundary of Welwyn Garden City than Digswell.

7.10 However, the Inspector noted that Digswell has no proposed allocations but is a sustainable location as the settlement contains a railway station. As such the plan should seek to deliver housing which is compatible with the scale and character of the village. The Inspector therefore decided to examine site Dig1, to assess the robustness of the reasons for its rejection given by the Council.

*Table 23 Sites Examined at Digswell*

HELAA (Ref)	Site Name	Urban / Green Belt	Number of Dwellings
Dig1	Land east of New Road.	Green Belt	80-100
Total			80-100

**Option Analysis**

7.11 Option C: allocation of the Dig1 site to deliver 100 dwellings.

7.12 Option D: allocation of the Dig1 site to deliver 80 dwellings.

7.13 In both options the area directly adjacent to the RPG to the south would only be utilised for access and landscaping to minimise harm to the heritage asset.

## Site Analysis

### Dig1 – Land to east of 2 New Road

- 7.14 The site Dig1 on land to the east of New Road in Digsweil was examined by the Local Plan Inspector at the Stage 9 hearing sessions. The site had been found unsuitable by the Council during the site selection process as it was considered that development would cause harm to surrounding heritage assets. It was therefore not considered in the Site Selection Background Papers in 2016 or 2019 and a site template was not prepared for the site.
- 7.15 Evidence submitted to the examination confirmed that substantial harm could be avoided and the Inspector considered that the benefits of the site coming forward had potentially not been assessed. A site selection template has now been prepared and is attached in Appendix 1. The summary is included below.

Site Selection Summary – Weighting	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 1-5 years (<u>Significant in favour</u>) potential for some dwellings to be delivered in mid-part of the plan period if larger capacity is delivered.</li> <li>• GB3 Study (Purposes): The wider parcel (P17) makes a significant contribution to one national purpose and partial contribution to one national purpose (<u>Moderate Against</u>)</li> <li>• Green Belt boundary: Proposed boundaries would be predominantly weaker than the existing boundaries, the boundary would not be clearly defined or defensible by existing features. (<u>Significant against</u>)</li> <li>• SA: More than 3 times double positives (++/++?) than double negatives (--/--?) (<u>Significant in favour</u>)</li> <li>• Flood Risk: Passes the sequential test</li> <li>• Landscape Assessment: Moderate (<u>Neutral</u>)</li> <li>• Strategic Advantages: Contribution to local need for housing in Welwyn Parish.</li> <li>• Strategic Disadvantages: None.</li> </ul>
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### Further considerations

#### *Five year land supply and delivery*

- 7.16 It is considered that some development of site Dig1 could come forward in the first five years of the plan.
- 7.17 Option C: If a larger development on site Dig1 were to come forward for 100 dwellings, then it is expected that some dwellings would be delivered in year 6 of the plan period.
- 7.18 Option D: If a slightly smaller development were to come forward for 80 dwellings then it is expected that this could all be delivered in the first five years of the plan.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Dwellings expected within 1-5 years (<u>Significant in favour</u>) potential for some dwellings to be delivered in mid-part of the plan period if larger capacity is delivered.</li> </ul>
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#### *Locational Accessibility*

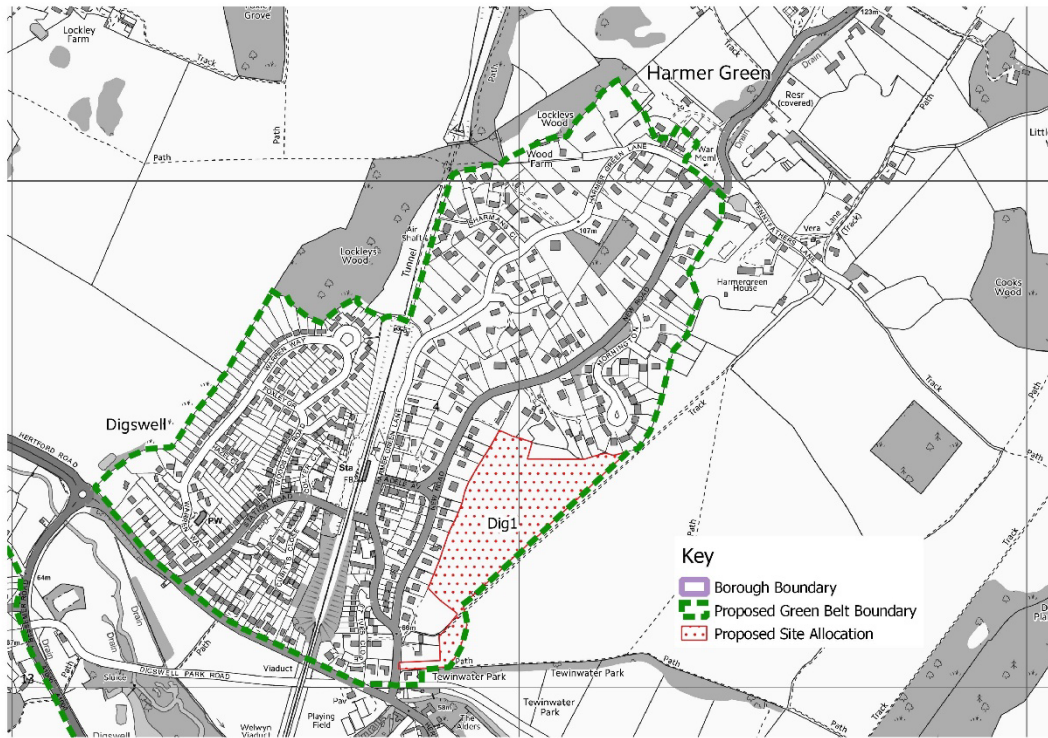
- 7.19 The Inspector noted that Digsweil has no proposed allocations but is a sustainable location as the settlement contains a railway station. As such the plan should seek to deliver housing which is compatible with the scale and character of the village.

- 7.20 When considering Dig1 the Inspector noted that there is the potential to accommodate development on this site, which is within walking distances of a primary school and local shops, without causing unacceptable harm to the wider Green Belt or the surrounding heritage assets.
- 7.21 There is no permeability with the existing settlement which significantly increases the distances to the facilities and station, extending the route for the northern areas of the site to approximately 1.2km, over the 800m desirable distance for local facilities as noted by the County Council.
- 7.22 The Inspector noted in paragraph 58 of his report that a more permeable and sustainable development could be achieved if there was a direct footpath or highway link through the site to New Road and that this could be achieved by the removal of a dwelling or an agreement to facilitate access. However, there is currently no evidence to suggest that this would be deliverable within the plan period. It is therefore expected that some dwellings would be over desirable distances to facilities.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of Welwyn Train Station, bus stops and a convenience store (Welwyn Stores).</li> </ul>
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### Green Belt

- 7.23 Dig1 was considered as a sub-parcel (Parcel 17a) of the Green Belt Stage 3 Study (EX99). The site was defined in the study as follows: *'The site has development to the north as well as the west, so development up to the ridge crest would be consistent with existing settlement form, but there is no distinction between the arable farmland in this site and the expanse of arable land beyond. Any new development here would lack the containment by tree cover that characterises the existing settlement. There are no strong boundary features to the east which could form a new Green Belt boundary.'*
- 7.24 The study considered the release of Dig1 on its own (sub-parcel 17a) and assessed this to have a slightly lesser degree of harm due to the proximity to development to the north and west and the potential to limit development to west of the ridge crest
- 7.25 As the existing Green Belt boundary formed by the rear of properties along New Road reflects the change in land levels any development would need to ensure that a robust, defensible Green Belt boundary can be formed. Due to the location of the site, irrespective of whether option C or D is recommended, the whole site would need to be released from the Green Belt to form a logical boundary in this location.
- 7.26 The revised Green Belt boundary is shown below.



### Policy Considerations

- 7.27 Inspector's comments: When considering Dig1 the Inspector noted that there is the potential to accommodate development on this site, which is within walking distances of a primary school and local shops, without causing unacceptable harm to the wider Green Belt or substantial harm to the surrounding heritage assets.
- 7.28 The inspector noted that the built development could be restricted to the area below the ridge crest, without harming the wider Green Belt or the setting of the heritage assets. If accompanied by appropriate mounding and planting, a larger development could eventually be appropriately screened from the wider countryside GB and the historic park.
- 7.29 The Council has been advised by our Heritage Consultant and Historic England that the development of the site will be harmful (less than substantial) to Tewin Water RPG. It is considered that through careful design and placement, there is potential to remove harm to Digswell Viaduct but this very much depends on maintaining views of the viaduct across the site and making best use of the site topography in the placement of development. The harm to the RPG can be mitigated but not removed entirely.
- 7.30 Two options have been presented and the estimated capacities have taken account of Heritage work submitted by the site promoter. Option D for 80 dwellings provides a slightly more cautious estimation of the sites capacity to allow for greater protection of environmental assets both heritage and landscape.
- 7.31 However, the information provided by the site promoter, finds it will be possible to retain views towards Welwyn Viaduct from the Landscape Character Area (LCA), however the extent of views towards it will be reduced. It has been suggested that to minimise the reduction of views towards the viaduct, and to promote or frame those that remain development of the site could include the provision of open space to the west of the public footpath to allow open views towards the viaduct. Also, to provide screening planting to the west of the public footpath at the northern end of the site, and at the

eastern side to the southern end allows more distant views to the viaduct to be retained from the north-east. With further work it may be possible for a development of 100 dwelling on this site to be delivered which would not impede views if all the recommendations in their heritage work are included.

7.32 A summary of the further considerations and policy considerations are shown below:

Policy Considerations	<ul style="list-style-type: none"> <li>• No residential dwellings to be located in the most southern portion of the site adjacent to the RPG.</li> <li>• Mitigate impact on heritage assets (RPG to south and Digswell Viaduct), a Heritage Statement/Impact Assessment required at planning application stage.</li> <li>• Maintain viewing corridor to the Viaduct.</li> <li>• Landscape buffer eastern boundary, to offset the impact of the development on the wider landscape, heritage assets and define the Green Belt boundary.</li> <li>• Avoid and mitigate impacts on the amenity of adjacent properties along New Road</li> </ul>
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## Settlement Summary

### Key Infrastructure Considerations

#### *Secondary Schools*

7.33 Hertfordshire County Council (HCC) updated its secondary school strategy in 2019 to address the additional housing growth proposed in the 2019 site Selection Paper. The updated strategy was set out in Section 10 relating to Welwyn Garden City, and the Digswell area will rely mainly on secondary schools within Welwyn Garden City.

#### *Primary schools*

7.34 HCC advised at the Stage 9 Hearing Session that St John Church of England Primary School is the only school within Digswell and that currently the school is at capacity. However, it was noted that not all of the pupils that attend the school are local to the school site, so there is an element of pushback of children to other schools which could occur. Therefore, should additional housing come forward in this area, it is anticipated that the education infrastructure could be sufficient to accommodate local pupils. At this time the County Council does not consider that the school needs to be expanded to accommodate development in this area.

#### *Highways*

7.35 At the hearing session the County Council noted that site Dig1 has not been included in HCC's latest County wide model run (COMET LPR5). It does not appear on either the Welwyn Hatfield Local Plan run or COMET LPR6. If the site is about small-medium scale (about 200 houses) development, it is considered that within Digswell the additional traffic could be accommodated within the capacity of the Harmer Green Lane corridor and no severe impacts are anticipated. Whilst there may be capacity and delay issues in the wider area this would not be due to development of this site and the development would be expected to make contributions to mitigation (as set out in the Infrastructure Delivery Plan).

## *Utilities*

- 7.36 There are no specific utilities infrastructure issues identified in association with increased growth at Digswell. From a sewage treatment point of view, new development in Digswell 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 which tested capacity for 16,000 homes and indicated that from a final effluent stream point of view the sewage treatment works is expected to have capacity up to 2036.

## **Settlement Strategy Implications**

- 7.37 Digswell is currently designated as a 'small excluded village and settlement' which is a 4th tier settlement in the settlement hierarchy where there is a limited range of employment opportunities and services.
- 7.38 The settlement is excluded from the Green Belt and is identified as being appropriate for a limited amount of development compatible with the scale and character of the village.
- 7.39 The settlement includes a train station giving the settlement wider links to services and employment opportunities. The development of Dig1 needs to be considered on balance with the need to deliver more homes in Digswell and the wider Welwyn Parish area and the harm to heritage assets. The harm to heritage assets is not considered to be substantial and as discussed there are options to mitigate harm.

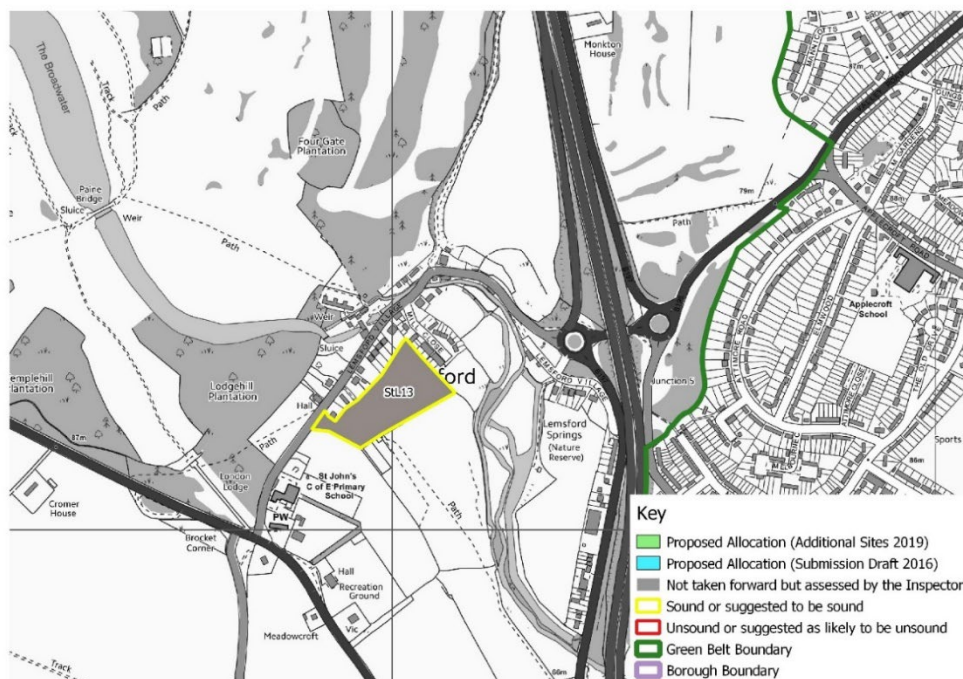
## **Settlement Summary / Conclusions**

- 7.40 As presented, there are two options to be considered for development in Digswell:
- **Option C:** allocation of the site to deliver 100 dwellings.
  - **Option D:** allocation of the site to deliver 80 dwellings.
- 7.41 As previously mentioned both options would require the area directly adjacent to the RPG to the south to only be utilised for access and landscaping to minimise harm to the heritage asset. Both options would also:
- 7.42 Deliver dwellings in the first five years of plan with Option C contributing some dwellings in the middle of the plan period
- 7.43 Have households on the northern portion of the site which may be more likely to be car dependent due to lack of permeability from the site to facilities and services in Digswell and due to the sites rising topography
- 7.44 The potential for appropriate mitigation in the form of landscape screening and bunding reduced the level of harm to heritages assets. Option D offers the greatest protection. If Option C is selected as the preferred option, then consideration should be given to reducing the capacity of this site to from 100 to 80 subject to the FOAHN being met.

## 8 Lemsford

### Introduction

- 8.1 Lemsford was classified as the fifth tier 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.



### Local Need for natural growth and Proportional distribution

- 8.2 The table below sets out what needs to be delivered in Lemsford to meet the local need and a proportionate distribution of the FOAHN.

*Table 24 Natural growth and proportion of the FOAHN at Lemsford*

Natural Growth	Proportionate FOAHN
7	31

### Completions and commitments at Lemsford

- 8.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough's housing supply towards meeting the FOAHN.
- 8.4 Table 25 shows that there have no completions and commitments in Lemsford.

*Table 25 Completions and commitments at Lemsford*

Completions 2016 - 2020	0
Commitments at 31 March 2021	0
Total	0

- 8.5 There were no sites were proposed for allocation in the Draft Local Plan 2016 for Lemsford. The completions and commitments total 0 dwellings, meaning Lemsford would need to accommodate between 7 and 31 dwellings to meet either its natural growth or proportion of the FOAHN figure

### **Additional sites examined by the Inspector**

- 8.6 The 2019 site selection process tested four additional sites at Lemsford. Two of the sites failed the Stage 2 HELAA and two passed to Stage 3.
- 8.7 The two sites which failed the Stage 2 assessment were StL5 and StL5a. StL5a was promoted as an extended site StL5. These sites were found to be unsuitable for development due to the potential for development to impact on the significant on surrounding heritage assets (Grade II Brocket Hall Registered Park and Garden and to the west are the Grade II\* listed gates, lodges and screen wall of Brocket Hall).
- 8.8 Site StL13 passed the Stage 3 assessment however, StL16 did not.
- 8.9 Site StL16 was not found suitable for allocation due to the level of harm which would arise from development of this site (High Harm). It was considered that release of the site would compromise the gap and weaken the relationship between Welwyn Garden City and its rural surroundings.
- 8.10 Site StL13 was examined by the Inspector at the Stage 9 hearing sessions. The Inspector considers that this site is either sound or could be made sound. Details of the site are set out in Table 26

*Table 26 Additional Sites examined at Lemsford*

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
StL13	Land at Roebuck Farm	Green Belt	27
Total			27

### **Option Analysis**

- 8.11 Option C: Proposes the allocation of StL13 Land at Roebuck Farm. This option proposes that Lemsford Village is excluded (inset) from the Green Belt and Policy SP3: Settlement Hierarchy is updated to reflect the change in categorisation for this settlement.
- 8.12 The addition of StL13 as an allocation would result in 27 dwellings. This would take the number of dwellings at Lemsford over the natural growth requirement but would be close to the proportional requirement of 31 dwellings.
- 8.13 Option D: Proposes that no housing sites are allocated in Lemsford.

### **Site Analysis**

#### **StL13, Land at Roebuck Farm**

- 8.14 This site, on land that was assessed as only making a moderate contribution to Green belt purposes, could accommodate 27 dwellings. The Council considers that new planting along the southern boundary could create a robust and defensible Green Belt



boundary. There is an adjacent listed building, but the Council considers that any potential harm could be appropriately mitigated.

8.15 The Lemsford Mead Wildlife site is located to the south-east. Although not immediately adjacent, the Inspector notes concern was expressed about the potential for domestic animals to impact upon this site, causing harm to the wildlife. The north-western boundary of the site has historically been enclosed with chain link fencing, suggesting that animal trespass has been an issue. However, this fence is in a poor state of repair and ineffective as a barrier to the movement of animals between the existing village and the wildlife site. The Inspector notes that appropriate mitigation, as a result of development, could restore and improve the overall protection provided to the wildlife site.

8.16 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site StL13 is included below

Site Selection Summary – Weighting	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 1-5 years (<u>Significant in favour</u>)</li> <li>• GB3 Study (Purposes): Makes a significant contribution to one national purpose (<u>Moderate Against</u>)</li> <li>• GB3 Study (Harm): Release of Parcel 35a from the Green Belt would lead to moderate harm (<u>Minor against</u>)</li> <li>• Green Belt boundary: The new Green Belt boundary around Lemsford is yet to be established, but the settlement is proposed to be released from the Green Belt. A new Green Belt boundary could be formed which would be partially weaker but could be clearly defined (<u>minor in favour</u>)</li> <li>• SA: More than 3 times double positives (++/++?) than double negatives (--/--?) (<u>Significant in favour</u>)</li> <li>• Flood Risk: Passes the sequential test</li> <li>• Landscape Assessment: Low-Moderate (<u>Moderate in favour</u>)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None.</li> </ul>
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### Further considerations

#### *Five year land supply and delivery*

8.17 It is considered that StL13 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: The site can deliver 27 dwellings within the first 5 years of the plan period. (Significant in Favour)</li> </ul>
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#### *Locational Accessibility*

8.18 The settlement of Lemsford includes a primary school (St John's C of E School) and several pubs. The closest local centre is Handside Neighbourhood Centre in Welwyn Garden City to the east of the A1(M). This can be accessed by foot albeit passing underneath the motorway. The site is also within 400m of a bus stop with an hourly bus service providing links to Welwyn Garden City and places to the north-west as far as Luton.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of a bus stop with a regular service and 800m of a primary school. (Significant in Favour)</li> </ul>
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### *Policy Considerations*

- 8.19 Should the StL13 site be allocated the whole settlement would need to be removed from the Green Belt and its position in the Settlement Hierarchy (which is set out in Policy SP3) changed.
- 8.20 A buffer between the adjacent wildlife site Lemsford Meads which is managed as a nature reserve and the developable area will be required to protect the wildlife value of the adjoining nature reserve.
- 8.21 Should this site be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• New planting along the southern boundary within the site would be required to create a robust and defensible Green Belt boundary.</li> <li>• A buffer between Lemsford Mead Wildlife site and the developable area will be required to protect the wildlife value of the adjoining wildlife site</li> </ul>
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### **Settlement Summary**

#### **Key Infrastructure Considerations**

- 8.22 The 2019 Sites Selection Paper sets out the key infrastructure issues by settlement as they were understood to be at that time. The infrastructure information provided at the time is considered to be up to date and the level of potential additional dwellings at Lemsford (27 dwellings) is not considered to have a significant impact on service delivery in this area.

#### **Settlement Strategy Implications**

- 8.23 Lemsford is currently designated as a Green Belt village which is a fifth tier settlement in the settlement hierarchy with some limited services and facilities. The settlement would need to be re-designated in the settlement hierarchy and removed from the Green Belt should StL13 be proposed for allocation. The Green Belt Study Stage 3 (EX99A) identified that Lemsford has the potential to be inset into the Green Belt as it does not have an open character and does not make a significant contribution to the openness of the Green Belt.
- 8.24 If site StL13 is not allocated it is considered that there is potential for the natural growth figure to be met over the lifetime of the plan by windfall development from proposals if not inappropriate in the Green Belt.

#### **Summary / Conclusions**

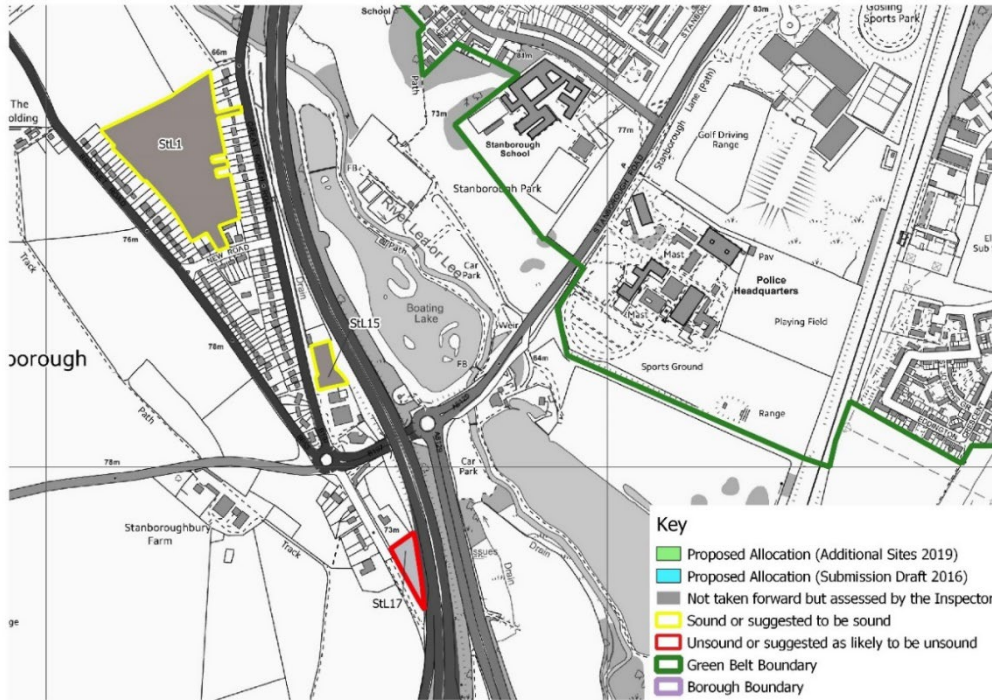
- 8.25 There are currently no sites proposed for allocation at Lemsford in the Draft Local Plan 2016. The allocation of StL13 for 27 dwellings would exceed the natural growth requirement of 7 dwellings but not exceed the proportional requirement of 31. This is considered to be proportional growth in Lemsford.
- 8.26 The allocation of the site would help towards the 5 year housing land requirement as the site would be delivered in the first 5 years of the Plan.

- 8.27 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. Option D proposes no allocations because of Lemsford's current position in the settlement hierarchy and because of the low level of local need which could potentially be met from windfall development.
- 8.28 **Option C:** Proposes the allocation of StL13 Land at Roebuck Farm for a total of 27 dwellings. This option proposes that Lemsford Village is excluded (inset) from the Green Belt and Policy SP3: Settlement Hierarchy is updated to reflect the change in categorisation for this settlement.
- 8.29 **Option D:** Proposes that no housing sites are allocated in Lemsford.

# 9 Stanborough

## Introduction

9.1 Stanborough falls into the sixth tier of settlements in Policy SP3: Settlement Hierarchy as a 'Small Green Belt villages and settlements'. Settlements in this category are washed-over by the Green Belt and, as mainly residential areas, look towards larger settlements for services and facilities. As noted in the Strategy these settlements are not generally considered suitable for further development unless it is compatible with Green Belt policy. Stanborough comprises 118 dwellings.



## Local Need for natural growth and Proportional distribution

9.2 The table below sets out what needs to be delivered in Stanborough to meet the local need and a proportionate distribution of the FOAHN.

Table 27 Natural growth and proportion of the FOAHN at Stanborough

Natural Growth	Proportionate FOAHN
9	42

9.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough’s housing supply towards meeting the FOAHN.

9.4 Table 28 shows the completions and commitments at Stanborough.

Table 28 Completions and commitments at Stanborough

Completions 2016 - 2020	-2
Commitments at 31 March 2021	21
<b>Total</b>	<b>19</b>

\*2 dwellings were demolished.

- 9.5 There were not sites allocated in the Draft Local Plan 2016 for Stanborough. Therefore, as the completions and commitments total 19 dwellings, to meet the proportionate requirement, an additional 23 dwellings are needed. The local need for housing of 9 dwellings would be met through commitments.

### **Additional sites examined by the Inspector**

- 9.6 The 2019 site selection process considered five additional sites. One site failed Stage 1, four sites passed Stage 2 but only 3 sites were considered suitable for allocation following the Stage 3 assessment.
- 9.7 The final three sites considered were examined by the Inspector at the stage 9 hearing session as sites which had been considered suitable for allocation but not submitted to the examination.
- 9.8 The Inspector concluded that Site StL17 Land at Great North Road (5 Gypsy and Traveller pitches) would result in development beyond the extent of the existing built development on the other side of Great North Road and therefore advised that the site is unlikely to be found sound. The site does not form part of the comparative assessment in this document.
- 9.9 The sites the Inspector considered are sound or could be sound are set out in Table 29

*Table 29 Additional Sites Examined at Stanborough*

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
StL1	Land to the north of New Road	Green Belt	90
StL15	Land to the east of Great North Road	Green Belt	8
Total			98

### **Option Analysis**

- 9.10 Option B: Proposed the allocation of StL1 and StL15 for a total of 98 dwellings. This option proposes that Stanborough is excluded (inset) from the Green Belt and Policy SP3: Settlement Hierarchy is updated to reflect the new category for this settlement.
- 9.11 The addition of the two sites as allocations in combination with completions and commitments would result in 117 dwellings at Stanborough, taking the number of dwellings over the proportional requirement of 42 dwellings by 75. This would double the size of the settlement.
- 9.12 Option C and D: Proposes no additional housing sites at Stanborough.

### **Site Analysis**

#### **StL1 Land to the north of New Road**

- 9.13 The site includes land that is surrounded by built development on three sides. It was assessed as only making a moderate contribution to Green Belt purposes and could accommodate about 80 dwellings. The northern boundary has no development, but its hedge could be strengthened and accompanied by other landscaping to create a clear Green Belt boundary.

- 9.14 Due to the proximity to Lemsford School and the adequate bus service through the village, the Inspector considers this site to be in a location that could enable a successful encouragement of the use of more sustainable means of travel.
- 9.15 However, the inspector notes that Stanborough no longer has a convenience store. The nearest shop selling food is probably the Hatfield Tesco, which being 1.5km away and is unlikely to be a destination that many people would walk or cycle to. There is however a bus connection.
- 9.16 The site promotor has indicated a willingness to provide a convenience store on New Road but there is no assessment to demonstrate its catchment population or viability.
- 9.17 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site StL1 is included below.

Site Selection Summary– Weighting	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 1-5 years (<u>Significant in favour</u>) potential for some dwellings to be delivered in mid-part of the plan period if larger capacity is delivered.</li> <li>• GB3 Study (Purposes): Makes a significant contribution to one national purpose (<u>Moderate Against</u>)</li> <li>• GB3 Study (Harm): Parcel 38 would lead to moderate harm if reduced (<u>minor against</u>)</li> <li>• Green Belt boundary: The new Green Belt boundary around Stanborough (yet to be established) would be similar in strength to the existing boundary (<u>moderate in favour</u>)</li> <li>• SA: More than 3 times double positives (++/++?) than double negatives (--/--?) (<u>Significant in favour</u>)</li> <li>• Flood Risk: Passes the sequential test</li> <li>• Landscape Assessment: Low-Moderate (<u>Moderate in favour</u>)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None.</li> </ul>
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### Further considerations

#### *Five year land supply and delivery.*

- 9.18 It is considered that development site StL1 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site. Some dwellings will be delivered in mid-part of the plan period.

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Some dwelling expected within 1-5 years (<u>Significant in favour</u>) some dwellings to be delivered in mid-part of the plan period.</li> </ul>
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#### *Locational Accessibility*

- 9.19 Whilst the site promotor of StL1 has indicated a willingness to provide a convenience store on New Road there is no assessment to demonstrate a viable catchment population for a potential store and, it is unlikely that this store would be delivered.
- 9.20 The Site is within 400m of a bus stop with a regular service and 800m of a secondary school.

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of a bus stop with a regular service and 800m of a secondary school. (<u>Significant in Favour</u>)</li> </ul>
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## StL15 Land to the East of Great North Road

- 9.21 The Council only considers that this site has a capacity to accommodate 8 dwellings. The Inspector notes that there is the need for attenuation measures to reduce the noise and air pollution from the adjacent motorway, to acceptable levels. It is one of a very few sites whose release from the Green Belt would cause low harm to the Green Belt's purposes.
- 9.22 The site is about 1km from Lemsford Primary School so it is unlikely that pupils would walk. It is otherwise slightly closer to facilities and the public transport network than site StL1 but they generate similar sustainability considerations. Its development would marginally add to the viability of a food store at Stanborough. The Inspector states that the site could be delivered within five years.
- 9.23 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site StL15 is included below.

Site Selection Summary– Weighting	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 6-10 years (<u>Moderate in favour</u>)</li> <li>• GB3 Study (Purposes): The site was not included in the GB3 study however, Parcel 39 which is adjacent to the site made limited or no contribution to purposes.</li> <li>• GB3 Study (Harm): As above, P39 is Low Harm.</li> <li>• Green Belt boundary: The new Green Belt boundary around Stanborough is yet to be established, but is proposed to closely follow the existing boundary of the settlement. The inclusion of StL15 would form a logical boundary especially given that the site is entirely enclosed between the A1M and existing residential development. Clearly defined and defensible boundaries could be formed which would be similar in strength (<u>Moderate in favour</u>)</li> <li>• SA: Four significant positives and no negatives (<u>Significant in favour</u>)</li> <li>• Flood Risk: Passes the sequential test</li> <li>• Landscape Assessment: Low-Moderate (<u>Moderate in favour</u>)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None.</li> </ul>
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### Further considerations

#### *Five year land supply and delivery*

- 9.24 It is considered that development site StL15 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the first five years. (<u>Significant in favour</u>)</li> </ul>
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#### *Locational Accessibility*

- 9.25 The Inspector has advised he considers the Stanborough sustainably located to access services and facilities due to proximity to Lemsford School and the bus service through the village providing a sustainable means of travel. However the inspector notes the nearest shop selling food is the Hatfield Tesco, which being 1.5km away and partly necessitating the use of footpaths adjacent to a major road, is unlikely to be a

destination that many people would walk or cycle to.

Further Considerations – Weighting	<ul style="list-style-type: none"><li>• Locational Accessibility: Site is within 400m of a bus stop with a regular service and 800m of a secondary school. (Significant in Favour)</li></ul>
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## Settlement Summary

### Key Infrastructure Issues

- 9.26 The 2019 Sites Selection Paper sets out the key infrastructure issues by settlement as they were understood to be at that time. The infrastructure information provided at the time is considered to be up to date and the level of potential additional dwellings at Stanborough (98 dwellings) is not considered to have a significant impact on service delivery in this area.

### Green Belt

- 9.27 The settlement of Stanborough currently lies within the Green Belt. The Stage 3 Green Belt study identified Stanborough as a settlement which could be inset or excluded from the Green Belt. The proposed sites lie within Parcel 38 and 39, their potential release from the Green Belt were assessed as 'moderate' or 'low' harm parcels and are considered to have limited impacts on the Green Belt. StL15 is contained by existing development and the A1 (M) and the site, StL1, is enclosed by existing development on three sides. It is important to note 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.

### Settlement Strategy Implications

- 9.28 Stanborough is currently designated as a Small Green Belt settlement and village which is a sixth tier settlement in the settlement hierarchy which looks to other settlements for services and facilities. It would need to be re-designated in the settlement hierarchy and removed from the Green Belt should StL1 and or StL15 be proposed for allocation. The Green Belt Study Stage 3 (EX88B) identified that Stanborough has the potential to be inset into the Green Belt as it does not have an open character and does not make a significant contribution to the openness of the Green Belt.
- 9.29 The natural growth figure has already been met by windfall development. The level of growth with allocation, completions and commitments would be significantly more than the proportionate distribution. It is also worth noting that the 2011 census identified 118 existing dwellings in Stanborough, these allocations combined with completions and commitments would total 117 additional dwellings. This represents a 99% increase in dwellings almost doubling the size of Stanborough. This is considered to be disproportionate, which is a significant weight against the allocation of these sites.

### Summary / Conclusions

- 9.30 The allocation of StL1 and StL15 for 98 dwellings would exceed the natural growth requirement of 9 dwellings and exceed the proportional requirement of 42, this is considered to be disproportional growth in Stanborough.
- 9.31 The allocation of the sites would help towards the 5 year housing land requirement as the sites would deliver 38 dwellings in the first 5 years of the Plan.



- 9.32 However, despite the proposed allocations contributing to the 5 year land supply and having an acceptable impact on the Green belt, Stanborough is not a particularly sustainable settlement it having no facilities within its boundary..
- 9.33 In addition, the proposed allocations combined with completions and commitments would represents a 99% increase in existing dwellings almost doubling the size of Stanborough. This level of growth is considered to be disproportionate for a sixth tier settlement, which is contrary to Policy SP3: Settlement Hierarchy.
- 9.34 **Option C and D:** Propose no additional housing sites at Stanborough.

## 10 North Mymms Parish Settlements

### Introduction

- 10.1 The Parish of North Mymms includes the settlements of Welham Green, Bell Bar, Brookmans Park and Little Heath. Bell Bar with Brookmans Park, Welham Green and Little Heath will be discussed individually in the following sections.

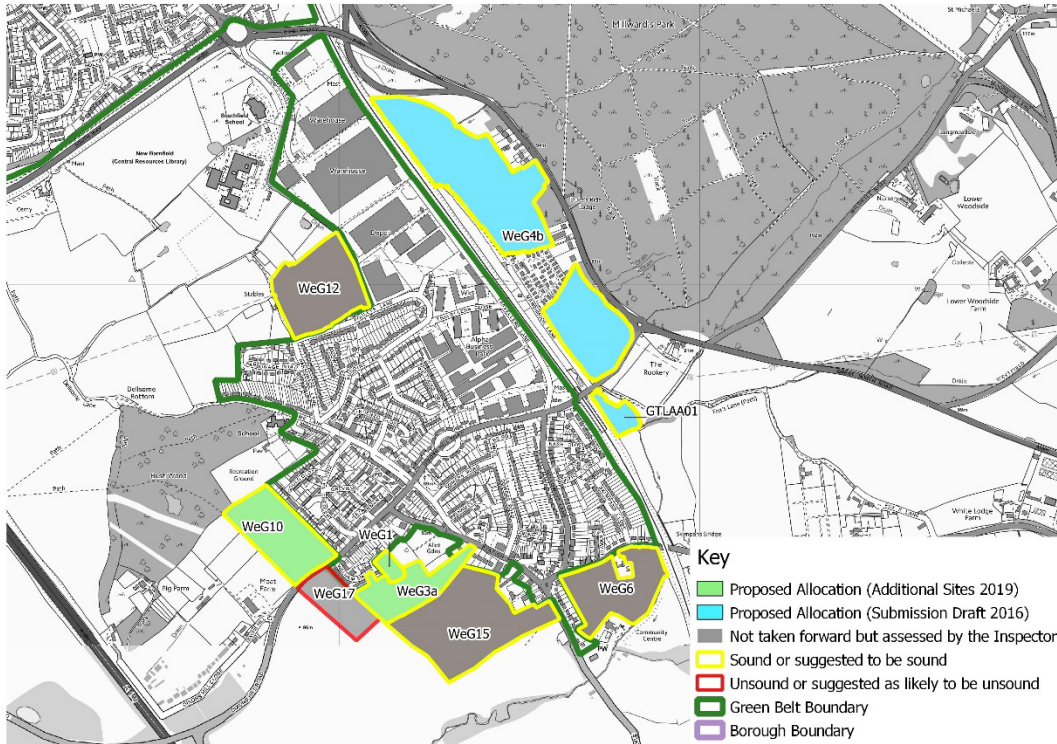
### Key Infrastructure

- 10.2 Hertfordshire County Council (HCC) as Education Authority has advised there is an interrelation between primary education and the settlements of Welham Green and Brookmans Park. Given the relatively close geographical proximity between the two settlements and the flows of pupils between the two primary schools and across the area, HCC considers that the primary education provision and mitigation for Welham Green and Brookmans Park should be considered together in the wider context rather than separately and in isolation.
- 10.3 HCC has advised that additional primary education capacity in the form of 3 additional forms of entry can be provided by:
- Utilisation of the 0.5fe of spare capacity at St Mary's Welham Green
  - Expansion of Brookmans Park Primary by 0.5fe to 2fe on its existing site
  - Provision of a new 2fe primary school.
- 10.4 A new school is likely required under both Options. HCC has advised that this should be in either Brookmans Park or Welham Green, the exact location of this site needs to be determined (and set out within the Local Plan) and would need to be suitably located to be accessible to both communities.

# 11 Welham Green

## Introduction

11.1 Welham Green is a village that falls within the third tier of the settlements in Policy SP3: Settlement Hierarchy. Identified as a “Large Excluded Village” it is a village not in the Green Belt with a service centre but a more limited range than the two towns. It is a secondary focus for new development where this is compatible with the scale and character of the village, and the maintenance of the Green Belt boundaries.



## Local Need for natural growth and Proportional distribution

11.2 The table below sets out what needs to be delivered in Welham Green to meet the local need and a proportionate distribution of the FOAHN.

Table 30 Natural growth and proportion of the FOAHN at Welham Green

Natural Growth	Proportionate FOAHN
96	419

11.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough’s housing supply towards meeting the FOAHN. Table 31 shows the completions and commitments at Welham Green

Table 31 Completions and commitments at Welham Green

Completions 2016 - 2020	8
Commitments at 31 March 2021	4
<b>Total</b>	<b>12</b>

11.4 After completions / commitments (12), an additional 84 dwellings are required to meet

the natural growth requirement, while an additional 407 dwellings are needed to meet the proportionate FOAHN requirement.

### Allocations found sound by the Inspector

- 11.5 Two sites were proposed for allocation in the Draft Local Plan 2016 for Welham Green and a further three as additional allocation in 2020. These sites are shown in table 32.

*Table 32 Sites proposed for allocation 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
SDS7	WeG4b	Marshmoor	Green Belt	100
	WeG1	51 Welham Manor	Green Belt	16
	WeG3a	Land South of Welham Manor	Green Belt	68
	WeG10	Dixons Hill Road	Green Belt	120
Total				316

*Note: WeG4b increased from 80 to 100 dwellings during the Hearing Sessions.*

- 11.6 When completions/commitments (12) and sound allocations (316) are considered, the total dwellings (328) exceed the natural growth requirement. An additional 91 dwellings are required to meet its proportionate FOAHN requirement of 419 dwellings.

### Additional sites examined by the Inspector

- 11.7 The Inspector examined an additional three sites all of which were considered sound or could be sound. These sites are set out in Table 33.

*Table 33 Additional Sites Examined at Welham Green*

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
WeG15	Land at Potterells Farm	Green Belt	72/56
WeG12	Pooleys Lane	Green Belt	83
WeG6	Skimpans Farm	Green Belt	73
Total			228/212

*Note: WeG15 has been identified as having the potential to accommodate a new 2fe Primary School, should a school be required the residual land is estimated to be able to deliver 56 dwellings (reduced from the identified 72 dwellings).*

- 11.8 Completions/commitments (12), sound allocations (316) and the additional sites (258/212) would result in up to 556 dwellings. This would exceed the number of dwellings over the proportional requirement of 419 dwellings. Should a school not be required at WeG15 and the whole site is available for residential development the Welham Green proportional FOAHN requirement would be exceeded by 136 dwellings (32.6%).

## Option Analysis

- 11.9 Option C: Proposes the addition of the three additional sites. WeG15 for 56 dwellings plus a 2fe primary school, WeG12 for 83 dwellings and WeG6 for 73 dwellings. These additions together with commitments, completions, and existing allocations would result in 540 dwellings.
- 11.10 Option D: Proposes the addition of two sites. WeG12 for 40 dwellings and WeG6 for 73 dwellings. These additions together with commitments, completions, and existing allocations would result in 441 dwellings.

## Site Analysis

### WeG15 Land at Potterells Farm

- 11.11 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site WeG15 is included below.

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable in 1-10 years (moderate in favour)</li> <li>• GB3 Study (Purposes): The site makes a significant contribution to one national purpose and a partial contribution to one national Green Belt Purpose. (moderate weight against)</li> <li>• GB3 Study (Harm): The site falls within the moderate high harm parcel (P64e) (Moderate Against)</li> <li>• Green Belt boundary: Proposed boundaries would be predominantly weaker than the existing boundaries, with the largest boundary not being clearly defined or defensible. (significant weight against)</li> <li>• SA: The site has more than three times as many significant positives as significant negatives. (significant weight in favour)</li> <li>• Flood Risk: Passes the sequential test.</li> <li>• Landscape Assessment: Moderate (neutral)</li> <li>• Strategic Advantages: If allocated alongside WeG3, the site would provide the opportunity for an alternative access into WeG3, avoiding further demand upon Welham Manor which, although an acceptable access in its own right, is constrained. (minor weight in favour)</li> <li>• Strategic Disadvantages: None</li> </ul>
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## Further considerations

### *Five year land supply and delivery*

- 11.12 It is considered that development site WeG15 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the first five years. <u>(Significant in favour)</u></li> </ul>
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### *Locational Accessibility*

- 11.13 Site WeG15 is within walking distance of shops and other local facilities within Welham Green as well as being within 400m of a two bus stop with a regular service. (Significant in favour)

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of bus stops and 800m of a train station. Significant in favour</li> </ul>
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*Education provision*

11.13 As stated additional primary school capacity is likely to be required across Welham Green and Bell Bar/Brookmans Park. WeG15 is considered to have the potential to deliver a 2fe primary school and the capacity of the site as originally assessed in the HELAA has been reduced accordingly.

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>• Strategic Advantages: Potential to deliver a 2fe primary school. Significant in favour</li> </ul>
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*Green Belt*

11.14 WeG15 as a sub parcel, its loss from the Green Belt was considered to result in moderate-high harm. In particular, it makes a significant contribution to purpose 3 countryside protection and its release would undermine the integrity of the wider Green Belt to the south and west, particularly its visual openness.

*Policy Considerations*

11.15 Site WeG15 is included in Option C. Under option C the site is proposed for 56 dwellings plus a 2fe primary school.

11.16 Should this site be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• Green Belt (mitigation): A strong landscape buffer will be required to screen development from the wider Green Belt to south and west.</li> </ul>
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11.17 Inspector’s comments: The Inspector advised that whilst this site does have positive attributes from a movement perspective, the site as a whole, in that context, is less sustainable than other sites at Welham Green that are being considered. It also makes a greater contribution to the Green Belt’s purposes and its visual openness than other sites being considered in Welham Green. The Inspector identified that a smaller part of the site could come forward with appropriate screening and the capacity of the site has also been reduced from 140 dwellings to reflect this reduction in site area as well as the need to make provision for a primary school.

11.18 Unless there is a genuine local need for additional housing that cannot be met in a more movement sustainable location and where exceptional circumstances for Green Belt release can be justified, then the development of the whole site is unlikely to be found sound.

**WeG12 Land north of Pooleys Lane**

11.19 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site WeG12 is included below.

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable in 1-5 years (Significant in favour)</li> <li>• GB3 Study (Purposes): The site makes a significant contribution to one national purpose and a partial contribution to one national purpose (moderate weight against).</li> </ul>
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	<ul style="list-style-type: none"> <li>• GB3 Study (Harm): Moderate harm parcel (P60) (minor against)</li> <li>• Green Belt boundary: Proposed boundaries would be similar in strength to the existing boundaries and could form clearly defined and defensible boundaries. (moderate weight in favour)</li> <li>• SA: The site has more than three times as many significant positives as significant negatives. (significant weight in favour)</li> <li>• Flood Risk: passes the sequential test.</li> <li>• Landscape Assessment: Moderate (neutral)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None</li> </ul>
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### Further considerations

#### *Five year land supply and delivery*

11.20 It is considered that development site WeG12 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site.

#### *Locational Accessibility*

11.21 Site WeG12 is within walking distance of shops and other local facilities within Welham Green as well as being within 400m of a bus stop with a regular service. (Significant in favour). As noted by the Inspector, from a movement perspective this is a very sustainable location for new residential development.

#### *Policy Considerations*

11.22 Under option C the site is proposed for 83 dwellings. It is considered that new Green Belt boundaries could be defined using the field boundaries that would be no more or less as clearly defined than the existing boundaries ensuring that any impact is minimized. Under option D the site is allocated for 40 dwellings. The reduced option would involve the area south of pylons coming forward for development with remaining land to the north remaining in the Green Belt.

#### *Green Belt*

11.23 Inspector's comments: Whilst the gap between Welham Green and Hatfield is fragile, the role that the openness of the whole of this site plays in that conundrum is reduced by the existing development to the east, which already joins the two settlements. Restricting the extent of built development to south of the electricity cables would limit the harm to the Green Belt but not remove it. From a movement perspective, this is a very sustainable location for new residential development.

### **WeG6 Skimpans Farm**

11.24 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site WeG6 is included below.

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable in 1-5 years (Significant in favour)</li> <li>• GB3 Study (Purposes): The parcel makes a significant contribution to one national purpose and a partial contribution to one national Green Belt purposes and the local purposes, but is largely contained by existing residential development to the west, the railway line to the east and woodland to the south (moderate against)</li> <li>• GB3 Study (Harm): The release of the whole parcel or site WeG6 would both result in moderate harm to the green belt (minor against)</li> </ul>
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	<ul style="list-style-type: none"> <li>• Green Belt boundary: New boundaries would be similar in strength to the existing boundaries (moderate in favour) Whilst, the new boundaries would slightly reduce a fragile gap between Welham Green and Brookmans Park this would be marginal. On balance, this is attributed minor weight against the site.</li> <li>• SA: The site has 2-3 times as many significant positives as significant negatives (moderate in favour)</li> <li>• Flood Risk: The site passes the sequential test.</li> <li>• Landscape Assessment: Low – Moderate/ Moderate (moderate in favour)</li> <li>• Strategic Advantages: None.</li> <li>• Strategic Disadvantages: None.</li> </ul>
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**Further considerations**

*Five year land supply and delivery*

11.25 It is considered that development site WeG6 could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the first five years. (Significant in favour)</li> </ul>
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*Locational Accessibility*

11.26 Site WeG6 is Site is within 600m of a railway station and is within 400m of two bus stops. (Significant in favour)

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 600m of a railway station and is within 400m of two bus (Significant in favour)</li> </ul>
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*Policy Considerations*

11.27 Under option C the site is proposed for 83 dwellings. It is considered that new Green Belt boundaries could be defined using the field boundaries that would be no more or less as clearly defined than the existing boundaries ensuring that any impact is minimized. Under option D the site is allocated for 40 dwellings. The reduced option would involve the area south of pylons coming forward for development with remaining land to the north remaining in the Green Belt.

11.28 Should this site be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• Noise assessment at planning application stage given proximity to the railway line.</li> </ul>
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11.29 Inspector’s comments: The Inspector note that whilst some pupils could cycle and others might walk, most probably would not. Also that, in comparative terms this is a sustainable location for residential development on a site whose removal from the Green Belt would only cause moderate harm to its purposes.

11.30 Following the Hearings the Inspector concluded that there are no severe highway issues and it is agreed that any potential harm to the setting of the adjacent listed buildings could be appropriately mitigated. Noise from the railway could be ameliorated by a bund



and planting, which could also eventually screen the site from passing trains.

## Settlement Summary

### Key Infrastructure Issues

- 11.31 The Site Selection Background Paper 2019 details the key infrastructure issues facing Welham Green. The only notable update relates to primary education provision across Welham Green and Bell Bar/Brookmans Park which is discussed in Section 12.

### Settlement Strategy Implications

- 11.32 Welham Green has a good village centre (17 units within the former A classes or similar uses), a mainline railway station and wide range of employment opportunities. As a result, it is in the third tier of settlements, below only Welwyn Garden City and Hatfield. Accordingly, it is an appropriate location for development at a lower level than Hatfield, but more than the small excluded villages such as Digswell and Oaklands and Mardley Heath with their much narrower range of services and facilities. This general approach is of course subject to settlement character and other constraints and green belt harm. Welham Green has the opportunity for relatively low harm green belt release.

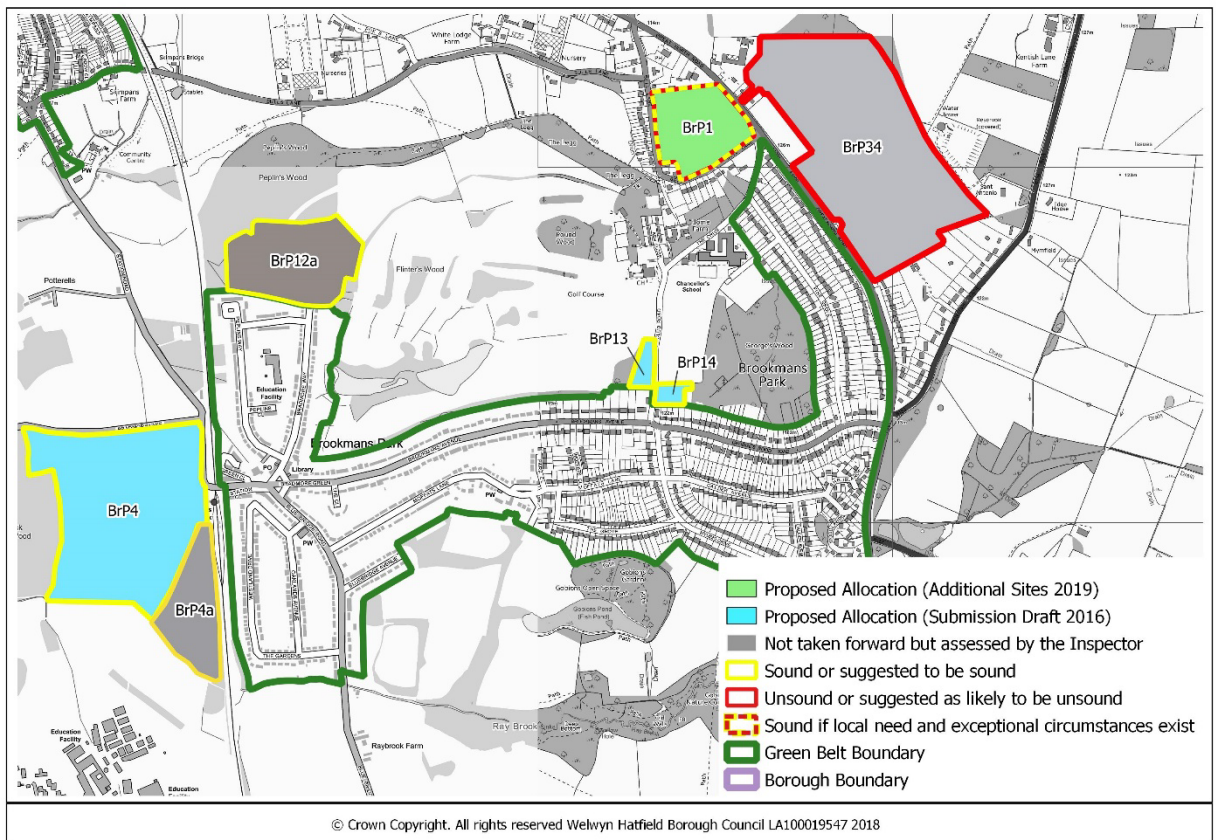
### Summary / Conclusions

- 11.33 The Inspector notes that due to the additional benefits provided by its large employment area, Welham Green is the most sustainable excluded village, enhanced further by the development of the strategic employment site at Marshmoor. Furthermore, Welham Green has several Green Belt sites that only make a moderate contribution to its purposes.
- 11.34 **Option C:** would result in 540 dwellings exceeding the number of dwellings over the proportional requirement of 419 dwellings by 121 dwellings (28.87%). This would represent a 41% increase on existing dwellings. A new 2fe primary school would also be provided in the village.
- 11.35 **Option D:** would result in 441 dwellings exceeding the number of dwellings over the proportional requirement of 419 dwellings by 22 dwellings (5.2%). This would represent a 34% increase on existing dwellings.
- 11.36 Option D does not include development at WeG15. WeG15 is the considered the least sustainable of the three additional sites, as stated by the Inspector whilst this site does have positive attributes from a movement perspective, the site as a whole, in that context, is less sustainable than other sites at Welham Green that are being considered. It also makes a greater contribution to the Green Belt's purposes and its visual openness than other sites being considered in Welham Green.

## 12 Bell Bar and Brookmans Park

### Introduction

- 12.1 Brookmans Park is one of several village excluded from (not in) the Green Belt with large service centres, but a more limited range of employment opportunities and services than the two towns. Policy SP3 'Settlement Strategy and Green Belt Boundaries' notes that such area should be a secondary focus for new development. The settlement has a railway station and is served by two bus services, contributing to their suitability as locations for new development. Villages with railway stations are noted by the Inspector as particularly sustainable (EX272).
- 12.2 Bell Bar, while closely related to Brookmans Park, in contrast is much lower in the settlement hierarchy. It is identified as one of several small villages and hamlets in the Green Belt. Policy SP3 'Settlement Strategy and Green Belt Boundaries' notes that typically residents look towards larger settlements for services and facilities, and that they are not generally suitable for further development unless it is compatible with Green Belt policy.
- 12.3 As discussed in this section, the inclusion of BrP1 would necessitate the removal of the site and the existing built-up area of Bell Bar from the Green Belt. This would, consequently, bring Bell Bar and Brookmans Park within the same settlement boundary necessitating a main modification to Policy SP3 'Settlement Strategy and Green Belt Boundaries' with respect of Bell Bar's position in the hierarchy.



## Local Need for natural growth and Proportional distribution

- 12.4 The table below sets out what needs to be delivered in Bell Bar and Brookmans Park to meet the local need and a proportionate distribution of the FOAHN.

*Table 34 Natural growth and proportion of the FOAHN at Bell Bar and Brookmans Park*

Natural Growth	Proportionate FOAHN
109	506

- 12.5 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough's housing supply towards meeting the FOAHN. Table 35 shows the completions and commitments at Bell Bar and Brookmans Park.

*Table 35 Completions and commitments at Bell Bar and Brookmans Park*

Completions 2016 - 2020	46
Commitments at 31 March 2021	51
Total	97

- 12.6 When completions and commitments are taken into account, to achieve the natural growth requirement an additional 12 dwellings is required and for the proportionate requirement, an additional 409 dwellings

### Allocations found sound by the Inspector

- 12.7 Three sites were proposed for allocation in the Draft Local Plan 2016 for Bell Bar and Brookmans Park, totaling 274 dwellings. These have been examined by the Inspector and found to be sound. These sites are shown in table 36.

*Table 36 Sites proposed for allocation at Bell Bar and Brookmans Park*

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS21	BrP13	Land west of Golf Club Road	Green Belt	14
HS22	BrP4	Land west of Brookmans Park Railway station	Green Belt	300
HS23	BrP14	Land east of Golf Club Road	Green Belt	10
Total				324

*Notes: HS22 (BrP4) has increased from 250 to 300 following the Hearing Sessions.*

- 12.8 When completions/commitments (97) and sound allocations (324) considered the total dwellings (421) exceeds the natural growth requirement. To meet the proportionate requirement would require an additional 85 dwellings. As a tier 3 settlement and a village with a station the levels of growth should be around or exceed the proportionate.

### Additional sites examined by the Inspector

- 12.9 The Inspector examined an additional three sites and an option of increasing the capacity of BrP4 and concluded that one of the sites BrP34 was not sound
- 12.10 The sites the Inspector considered are sound or could be sound are set out in Table 37.

Table 37 Additional Sites Examined at Bell Bar and Brookmans Park

HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
BrP1	Upper Bell Lane	Green Belt	104
BrP4a	Land west of Brookmans Park Railway station	Green Belt	178/128
BrP12a	Land north of Peplins Way	Green Belt	125
Total			407/357

*Notes: BrP4a is land to be removed from the Green Belt as part of sound allocation HS22 (BrP4). If is required to either be allocated as part of HS22 (BrP4) or safeguarded. Should it be allocated for development as part its inclusion within HS22 (BrP4) would deliver either an addition 178 dwellings or 128 dwellings plus a 2fe primary school.*

- 12.11 Completions/commitments (97), sound allocations (324) and the additional sites (407/357) would result in up to 828/778 dwellings. This would exceed the number of dwellings over the proportional requirement of 506 dwellings by 322 dwellings (63.6%) or by 272 dwellings (53.8%).
- 12.12 BrP1 was put forward to the examination by the Council in November 2020 as an additional opportunity for development on land which would result in no more than moderate harm to the Green Belt. The inspector suggests that very few people would regularly walk or cycle the 2km distances to the village centre and while Chancellors secondary school is within walkable distance of the site, as are some retail facilities, these are on the opposite side of the A1000. The promoter of the site has indicated his willingness to provide a new cycle link connecting this site with BrP12a which would reduce the distances to the village centre to 1.5km. The highway authority has indicated it would be necessary to install a crossing point and to improve the pedestrian environment along the A1000 adjacent to the site, which the promoter of the site has confirmed a willingness to fund. A unilateral undertaking has been submitted to the Council to this effect.
- 12.13 The Inspector has not yet concluded on the soundness of this site. He has stated that in comparison with other options at Brookmans Park, this is not a particularly sustainable site for new residential development. Unless there is a genuine local need for additional housing that cannot be met in a more movement sustainable location and where exceptional circumstances for Green Belt release can be justified, then the development of this site is unlikely to be found sound.
- 12.14 Whilst the sustainability credentials of the site can be improved this is not to such an extent that it out performs BrP4a or BrP12a. As stated above, the additional sites would result in up to 828 dwellings exceeding the proportional requirement of 506 by 63.6%. This would represent a 54% increase on existing dwellings. It is considered that there is not a genuine local need for this level of additional housing, therefore it is considered the Inspector would be unlikely to find BrP1 sound.

### Option Analysis

- 12.15 Option B: Proposes BrP1, BrP12a and BrP4a, however as stated above, this option would be unlikely to be found sound as the level of growth significantly exceeds that required to meet local need. Option C is a variant of Option B.

- 12.16 Option C: Proposes BrP12a and development at BrP4a for 178 dwellings. These additions together with commitments, completions, and existing allocations would result in 724 dwellings. This would exceed the number of dwellings over the proportional requirement of 506 dwellings by 218 dwellings (43.6%).
- 12.17 Option D: Proposes BrP4a for 128 dwellings, bringing the total of HS22 (BrP4) to 428 dwellings and the inclusion of a primary school. This extension together with commitments, completions and existing allocations would result in 549 dwellings.

## Site Analysis

### HS22 (BrP4/BrP4a) Land west of Brookmans Park Railway station

- 12.18 This site has already been found to be sound in principle.
- 12.19 The Inspector suggested that the triangular area between the site's eastern boundary and the railway is removed from the Green Belt and either allocated for development during the plan period or safeguarded for later years. This is referred to as BrP4a.
- 12.20 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site BrP4 is included below however this did not include the development of the triangular area between the eastern boundary and the railway station.

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 1-10 years. (Moderate weight in favour)</li> <li>• GB3 Study (Purposes): contributes significantly to one national purpose and a partial contribution to one national purpose (moderate weight against)</li> <li>• GB3 Study (Harm): The site falls within a high harm sub-parcel (Parcel 65a) (significant against)</li> <li>• Green Belt boundary: New boundaries would be predominately weaker overall than the existing boundary, but could form clearly defined and defensible boundaries (moderate weight against)</li> <li>• SA: The site has less than twice as many double positives (minor weight in favour).</li> <li>• Flood Risk: Site passes the sequential test.</li> <li>• Landscape Assessment: Moderate-high (moderate-against)</li> <li>• Strategic Advantages: Development of the site provides the opportunity to improve Station Road at the right angle approach to the existing vehicle bridge over the railway, which is currently problematic for larger vehicles, to the benefit of the wider community. This is attributed minor weight in favour of the site. The site provides one of three opportunities in the village to deliver a new 2Fe primary school, which would enable growth in the village (moderate weight in favour)</li> <li>• Strategic Disadvantages: None</li> </ul>
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### Further considerations

#### *Five year land supply and delivery*

- 12.21 It is considered that development on the additional land at BrP4 could come forward in years 11-15 of the plan which is a significant weight in favour of the allocation of this site.

Further Considerations –	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the last five years of the plan. (Significant in favour)</li> </ul>
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Weighting	
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*Locational Accessibility*

12.22 The additional land at BrP4 is within walking distance of shops and other local facilities within Brookmans Park. It is considered the most locationally preferable of all the potential additional sites in Bell Bar/Brookmans Park.

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of bus stops and 800m of a train station. Significant in favour</li> </ul>
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*Policy Considerations*

12.23 The Inspector has already found BrP4 to be sound. The Inspector has stated that the triangular area between the site’s eastern boundary and the railway (BrP4a) should also be removed from the Green Belt and either allocated for development during the plan period or safeguarded for later years.

12.24 Allocating either BrP12a or BrP1 would require removing additional land from the Green Belt. BrP4a is to be removed from the Green Belt as a consequence of the allocation of BrP4. BrP4a is more accessible than either BrP12a or BrP1. Therefore, in comparative terms, the allocation of BrP4a is preferable than either BrP12a or BrP1.

12.25 The lack of additional harm to the Green Belt arising from development of the triangular land at BrP4a has significant weight in the consideration of this site. It is already proposed that BrP4 includes landscaping and screening to the south, this mitigation would extend across BrP4a, therefore not all of BrP4a will be subject to a built form development.

12.26 Should this site be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• Landscaped screening bund to the north of the southern boundary to screen the site from Hawkshead Road and the public footpaths to its north.</li> <li>• Provision of land for a new 2FE Primary School site and playing field.</li> </ul>
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12.27 Inspector’s comments: The inspector notes that this site is one of the most sustainable locations for new development, from a movement perspective, outside of the two towns. There are no highway access, capacity or safety issues that cannot be resolved by mitigation, including maintaining the current nature and low traffic volumes along Bradmore Lane.

**BrP12a Land north of Peplins Way**

12.28 Site BrP12a was not submitted to the examination by the Council due to the sites location between Welham Green and Brookmans Park and concerns about the fragile gap between them.

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within the first five years (significant in favour)</li> <li>• GB3 Study (Purposes): The site makes a significant contribution to one national purpose and partial contribution to one national purpose (moderate against)</li> <li>• GB3 Study (Harm): Parcel 66a is moderate-high harm (moderate</li> </ul>
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	<p>against)</p> <ul style="list-style-type: none"> <li>• Green Belt boundary: Overall, a new Green Belt boundary would be similar in strength to the existing Green Belt boundary although part of the boundary is not clearly defined (minor in favour).</li> <li>• SA: The site has less than twice as many double positives than double negatives (minor in favour)</li> <li>• Flood Risk: Site passes the sequential test.</li> <li>• Landscape Assessment: Moderate (neutral)</li> <li>• Strategic Advantages: The site provides an opportunity to deliver a C2 care home (minor in favour)</li> <li>• Strategic Disadvantages: No strategic disadvantages.</li> </ul>
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### Further considerations

#### *Five year land supply and delivery*

12.29 It is considered that development on the additional land at BrP12a could come forward in the first 5 years of the plan which is a significant weight in favour of the allocation of this site.

#### *Locational Accessibility*

12.30 The site BrP12a is within walking distance of shops and other local facilities within Brookmans Park. It is considered a sustainable location for development with only the additional land at BrP4 more sustainably located. The proximity to local facilities is a significant weight in favour of the allocation of this site.

Further Considerations– Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of bus stops and 800m of a train station. Significant in favour</li> </ul>
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#### *Policy Considerations*

12.31 Should this site be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• Green Belt Boundary: extend and reinforce landscaping to the northeast and east to screen the site from the east</li> </ul>
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12.32 Inspector's comments: The site is between 0.5km and 0.75 km from the village centre which has a range of local shops and other facilities as well as bus stops with regular services to a number of destinations. The railway station is a little further distant, but the Primary School is much closer and within easy walking distance. From a movement perspective, this is a sustainable location for residential development.

### Site Analysis

#### **BrP1 Upper Bell Lane**

12.33 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment for site BrP1 is included below.

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 6-10 years (moderate weight in favour).</li> <li>• GB3 Study (Purposes): Parcel 72 covers a significant proportion of the BrP1 site area (exception of builder's yard) that has a high degree of physical openness. This makes a partial contribution against one</li> </ul>
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	<p>national purpose (P3) and limited or no contribution against two national purposes (P2, 3) (minor in favour)</p> <ul style="list-style-type: none"> <li>• GB3 Study (Harm): Release of P72, with P68 (insetting of settlement of Bell Bar) will result in Moderate Green Belt harm, as it is largely open and undeveloped and will result in the encroachment of the countryside. But the harm would be limited and not impact the wider Green Belt as it this is largely contained to the north, south and west (Minor against). N.B this parcel assessment assumes land at home farm and the tree belt between the Bell Bar and Brookman's Park remains within the Green Belt, as it maintains a level of separation between the settlements and does not increase harm.</li> <li>• Green Belt Boundary: This site would need to be released in conjunction with the inset of the built up area of the settlement of Bell Bar. This will help draw logical and clearly defined boundaries. The wider area is largely urbanised therefore any adverse impact on Green Belt purposes would be limited. New Green Belt boundaries would be similar in strength to the existing boundaries. This is attributed (moderate weight in favour) of the site.</li> <li>• SA: The site 2-3 times more significant positives (5) as significant negatives (2). This is attributed (Moderate weight in favour) the site.</li> <li>• Flood Risk: Site passes the sequential test.</li> <li>• Landscape Assessment: Low-moderate (moderate in favour)</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None</li> </ul>
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### Further considerations

#### *Locational Accessibility*

12.34 While close to several bus stops (significant weight) the Inspector has stated that for persons for whom travel by bus is not the only movement option would be unlikely to use them on a regular basis. The services are also not particularly satisfactory for persons who have no choice other than to rely on the use of public transport to move about.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of bus stops. (<u>Significant in favour</u>)</li> </ul>
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#### *Policy Considerations*

12.35 Notwithstanding the Inspectors concerns over the sites locational accessibility, should this site be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• Construction of a segregated footpath/cycleway to improve the connectivity with the Village centre.</li> <li>• Construction of a crossing point, improved pedestrian footpaths and bus stops on other side of A1000 to improve connectivity to facilities on other side of the road.</li> <li>• Retain and enhance the trees and hedgerow to a substantial width along the A1000 boundary of the site to create a defensible Green Belt boundary and help to mitigate any road noise impacts on future residents.</li> <li>• Heritage Statement/Impact Assessment may be required (proximity to two Listed Buildings).</li> <li>• Secure any necessary upgrades to waste water infrastructure.</li> <li>• Preliminary Ecological Assessment may be required at planning</li> </ul>
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	<p>application stage (potential for nesting birds in trees/reptiles in rough vegetation. (Development in excess of 100 dwellings may trigger a Natural England consultation at planning application stage due to proximity of two SSSIs).</p>
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- 12.36 Inspector's comments: The Inspector has noted the site is some distance from local shops and services, with the railway yet further away. He considers that very few people would regularly walk these distances and the use of facilities by cyclists on a regular basis is unlikely to be high. In his conclusions the Inspector has advised that this is not a particularly sustainable location for a significant amount of new development.
- 12.37 The Inspector has noted there are no insurmountable highway issues. He does however go on to note that the site is about 2km from the village centre and very few people would regularly walk these distances to such facilities and their use by cyclists, on a regular basis, is unlikely to be high.
- 12.38 The Inspector has stated that whilst, the promoter has offered to construct a segregated footpath/cycleway to improve the connectivity, the distance to the village centre would still be about 1.5km. It would provide a more attractive route and the highway Authority considers the site to be reasonably sustainable in this context. However, the Inspector has concluded that even this distance is significantly above the generally accepted walking distance to local shops and facilities.
- 12.39 Chancellors secondary school is within walkable distance of the site, as are some retail facilities at a petrol filling station and garden centre. However, the latter two are on the opposite side of the A1000, a very busy main road that is difficult to cross on foot. There were no proposals to provide a crossing point or to improve pedestrian movement along the side of this road, before the Examination at the time of the hearing. Subsequently the highway authority has indicated that it would be practical to install such facilities and to improve the pedestrian environment along the A1000 adjacent to the site. However, the Inspector notes that the deliverability of these essential off-site improvements is not certain.
- 12.40 In his conclusion the Inspector found that, the evidence before the examination suggests that in comparison with other options at Brookmans Park, this is not a particularly sustainable site for new residential development. Unless there is a genuine local need for additional housing that cannot be met in a more movement sustainable location and where exceptional circumstances for Green Belt release can be justified, then the development of this site is unlikely to be found sound

## **Settlement Summary**

### **Key Infrastructure Issues**

- 12.41 The Site Selection Background Paper 2019 details the key infrastructure issues facing Bell/Bar Brookmans Park. The only notable update relates to primary education provision across Welham Green and Bell Bar/Brookmans Park which is discussed in Section 14.

### **Settlement Strategy Implications**

- 12.42 Brookmans Park has an excellent village centre (41 units in former A use classes or similar town centre uses including a library), a mainline railway station and good employment opportunities near to the village. As a result, it is in the third tier of settlements, below only Welwyn Garden City and Hatfield.

12.43 Accordingly, it is an appropriate location for development at a lower level than Hatfield, but more than the smaller excluded villages such as Digswell and Oaklands and Mardley Heath with their much narrower range of services and facilities. This general approach is of course subject to settlement character and other constraints and Green Belt harm. Development around Brookmans Park is generally associated with moderate-high and high harm to the Green Belt.

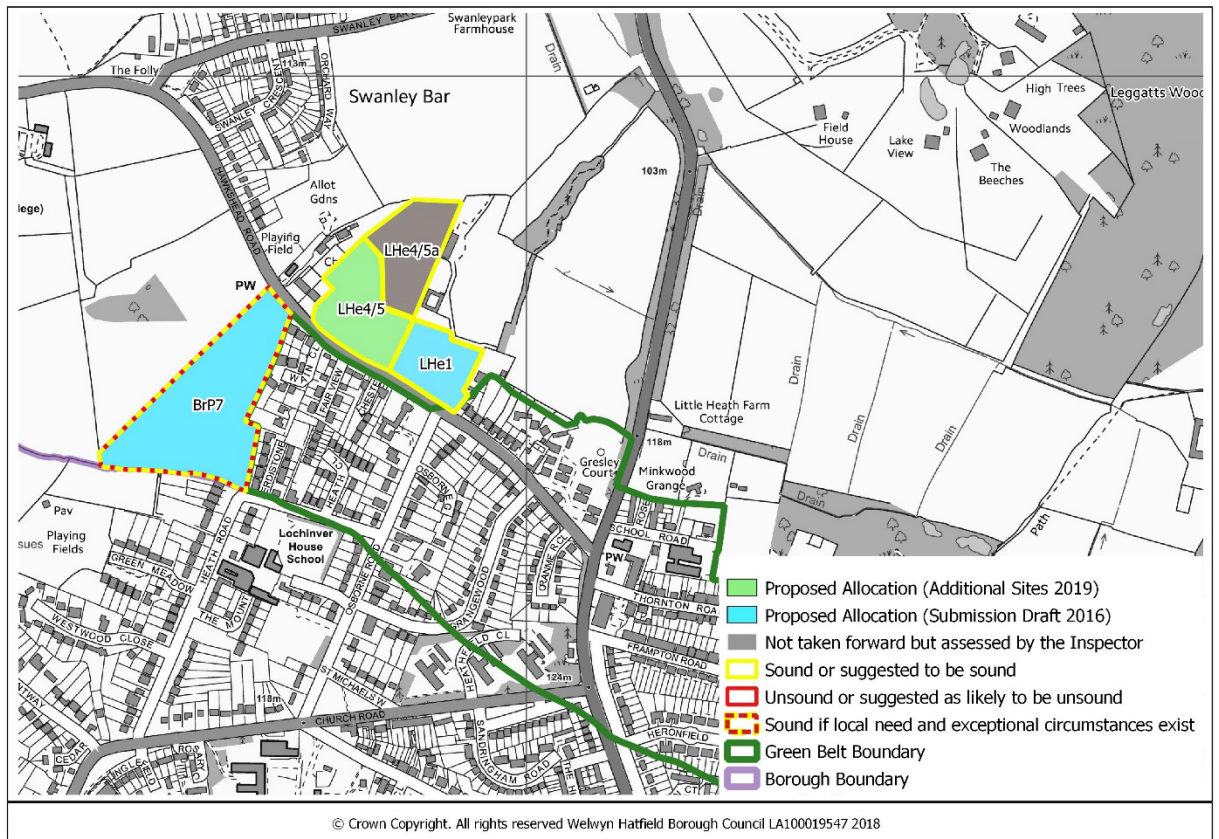
### **Summary / Conclusions**

- 12.44 Brookmans Park is in the third tier of settlements, below only Welwyn Garden City and Hatfield. It is considered appropriate for the level of development at Brookmans Park to be at least the proportionate requirement (506 dwellings).
- 12.45 **Option C:** Proposes the addition of BrP12a and development of BrP4a for 178 dwellings. These additions together with commitments, completions, and existing allocations would result in 724 dwellings. This would represent a 47% increase on existing dwellings.
- 12.46 **Option D:** Proposes an extension of BrP4a for 128 dwellings delivering 428 dwellings and inclusion of a primary school on HS22 (BrP4). This extension together with commitments, completions and existing allocations would result in 549 dwellings. This would represent a 36% increase on existing dwellings.
- 12.47 BrP4a is land that is to be removed from the Green Belt to facilitate the delivery of sound allocation HS22 (BrP4). Therefore, development at BrP4a is considered to result in less harm than the release of BrP12a.
- 12.48 The benefits of BrP12a are not underestimated. However, for the reasons set out above, the allocation of BrP4a is considered significantly and demonstrably preferable should a proportionate approach be adopted set out in Option D.

# 13 Little Heath

## Introduction

13.1 Little Heath falls into the fourth tier of settlements in Policy SP3: Settlement Hierarchy of smaller villages excluded (inset) from the Green. The Policy SP3 description notes that Little Heath forms a northern extension of the town of Potters Bar in Hertsmere. Fourth tier settlements have a more limited range of employment opportunities and services than the large, excluded villages. They are a secondary focus of a limited amount of new development where this is compatible with the scale and character of the settlement.



### Local Need for natural growth and Proportional distribution

13.2 The table below sets out what needs to be delivered in Little Heath to meet the local need and a proportionate distribution of the FOAHN.

Table 38 Natural growth and proportion of the FOAHN at Little Heath

Natural Growth	Proportionate FOAHN
34	158

13.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough’s housing supply towards meeting the FOAHN. Table 39 shows the completions and commitments at Little Heath.

*Table 39 Completions and commitments at Little Heath*

Completions 2016 - 2020	5
Commitments at 31 March 2021	1
<b>Total</b>	<b>6</b>

- 13.4 After completions and commitments, an additional 28 dwellings are required to meet the natural growth requirement, while an additional 152 dwellings are needed to meet the proportionate FOAHN requirement.

### **Allocations found sound by the Inspector**

- 13.5 Two sites were proposed for allocation in the Draft Local Plan 2016 for Little Heath (HS24 and HS25) and a further site (LHe4/5) was added in 2020. HS25 and LHe4/5 have been found sound by the Inspector. These two sound sites are shown in table 40.

*Table 40 Sites proposed for allocation at Little Heath*

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS25	LHe1	Land north of Hawkshead Road	Green Belt	35
	LHe4/5	Land at Videne and Studlands, Hawkshead Road	Green Belt	36
<b>Total</b>				<b>71</b>

Notes: \*Increased from 36 to 63 as a result of amended Green Belt boundaries

- 13.6 When completions/commitments (6) and sound allocations (71) are considered, the total dwellings (77) exceed the natural growth requirement of 34 and but is less than the proportionate OAHN requirement of 158.

### **Additional sites**

- 13.7 The Inspector has asked the Council to revisit the Green Belt boundary relating to LHe4/5 in order to achieve a more legible and logical boundary that excludes the developable parts of the finger of land from the Green Belt and include it either within the development area or as safeguarded land. The area resulting from this review is referred to as site LHe4/5a. This site is to either be allocated for development or safeguarded.

*Table 41 Additional sites at Little Heath*

Site Ref	Site Name	Urban / Green Belt	Number of Dwellings
LHe4/5a	Land at Videne and Studlands, Hawkshead Road	Green Belt	27
<b>Total</b>			<b>27</b>

### **Option Analysis**

- 13.8 Site HS24 Land south of Hawkshead Road (BrP7) was proposed for allocation in 2016. As discussed in the following paragraphs the Inspector has advised that it is not a particularly sustainable location for a significant amount of new development but noted that some development in Little Heath is required if local needs are to be met. The

Inspector noted that other options would result in less Green Belt harm and therefore he has not concluded on whether or not this site is sound. Details of this site are included in table 42.

*Table 42 Sites that can potentially be removed at Little Heath*

Draft 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
Total				100

- 13.9 Option B: Proposed the allocation of HS24 (BrP7) and LHe4/5a. Option C is a variant of Option B developed to improve its performance against the Inspector's tests.
- 13.10 Option C and Option D: Both options include the allocation of the LHe4/5a for 27 dwellings. This land is to be removed from the Green Belt to facilitate the delivery LHe4/5 that has been found sound. The choice is whether to allocate this site for development or safeguard the land. It is therefore proposed in both options for the land to be allocated. Therefore, the total for Little Heath would be 104 dwellings. This comprises the allocations totaling 98 dwellings and the commitments / completions totaling 6 dwellings.

### Site Analysis

#### Site LHe4/5a, Land at Videne and Studlands, Hawkshead Road (extension to LHe4/5)

- 13.11 In his round up notes following the Stage 9 Hearings (EX273) the Inspector asked the Council to revisit the Green Belt boundary in the area of LHe4/5 in order to achieve a more legible and logical boundary that excludes the developable parts of the finger of land from the Green Belt and includes it either within the development area or as safeguarded land. This exercise has been completed and it is considered the additional land (referred to as LHe4/a) could deliver an additional 27 dwellings to LHe4/5

### Further considerations

#### *Five year land supply and delivery*

- 13.12 It is considered that development on the additional land at LHe4/5a could come forward in the first five years of the plan which is a significant weight in favour of the allocation of this site.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>5YHLS: Delivery expected in the first five years of the plan. (Significant in favour)</li> </ul>
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#### *Locational Accessibility*

- 13.13 The site shares the same locational accessibility merits as LHe4/5 which has been found sound. In discussing the movement sustainability credentials of LHe4/5 (EX273) the Inspector states that despite the comparatively poor movement sustainability credentials of this site, there is a need for some new development at Little Heath if local needs are to be satisfied locally.

## **Settlement Summary**

### **Key Infrastructure Issues**

- 13.14 The Site Selection Background Paper 2019 details the key infrastructure issues facing Little Heath. The educational implication of this level of growth were discussed at hearing session and nothing significant identified.

### **Settlement Strategy Implications**

- 13.15 Little Heath is currently designated as a 'small excluded village and settlement' which is a 4th tier settlement in the settlement hierarchy where there is a limited range of employment opportunities and services. The settlement is excluded from the Green Belt and is identified as being appropriate for a limited amount of development compatible with the scale and character of the village. The allocation of the two additional sites would increase the number of dwellings to be delivered over the local need figures for natural growth and proportional distribution for Little Heath.

### **Summary / Conclusions**

- 13.16 Little Heath is a village that falls within the fourth tier of the settlements in Policy SP3: Settlement Hierarchy. Identified as a "Small Excluded Village/Settlement" it is a settlement not in the Green Belt but with a more limited range of services and facilities than the Large Excluded Villages. It is only suitable for a limited amount of new development, where this is compatible with the scale and character of the settlement and the maintenance of the Green Belt boundaries.
- 13.17 Option C and D both propose the addition of LHe4/5a. This land is to be removed from the Green Belt as a result of the allocation of the LHe4/5, an allocation found sound by the Inspector. The additional land (LHe4/5a) is to either be allocated for development or safeguarded. It is proposed under both options that the site be allocated for 27 dwellings helping to meeting FOAHN and delivery in the first five years of the plan period.
- 13.18 When completions/commitments (6), sound allocations (71) and LHe4/5a (27) are considered, the total dwellings (104) exceed the natural growth requirement of 34 but is less than the proportionate FOAHN requirement of 158.
- 13.19 The inclusion of HS24 (BrP7) would add an additional 100 dwellings to Little Heath. However as stated, the Inspector has raised concerns over the sustainability of the location for a significant amount of new development. If HS24 (BrP7) was to be included the total number of dwellings would be 204 which is in excess of both the natural growth requirement (34) and the proportionate FOAHN requirement (158). It would represent a 43% increase on existing dwellings in Little Heath.

## 14 North Mymms Parish Summary

### Key Infrastructure

- 14.1 As stated, Hertfordshire County Council (HCC) as Education Authority has advised there is an interrelation between primary education and the settlements of Welham Green and Brookmans Park. Given the relatively close geographical proximity between the two settlements and the flows of pupils between the two primary schools and across the area, HCC considers that the primary education provision and mitigation for Welham Green and Brookmans Park should be considered together in the wider context rather than separately and in isolation.
- 14.2 Additional education capacity in the form of a site for a 2fe primary school has been accounted for in both options, as set out in the table below.

*Table 43 education capacity within North Mymms Parish*

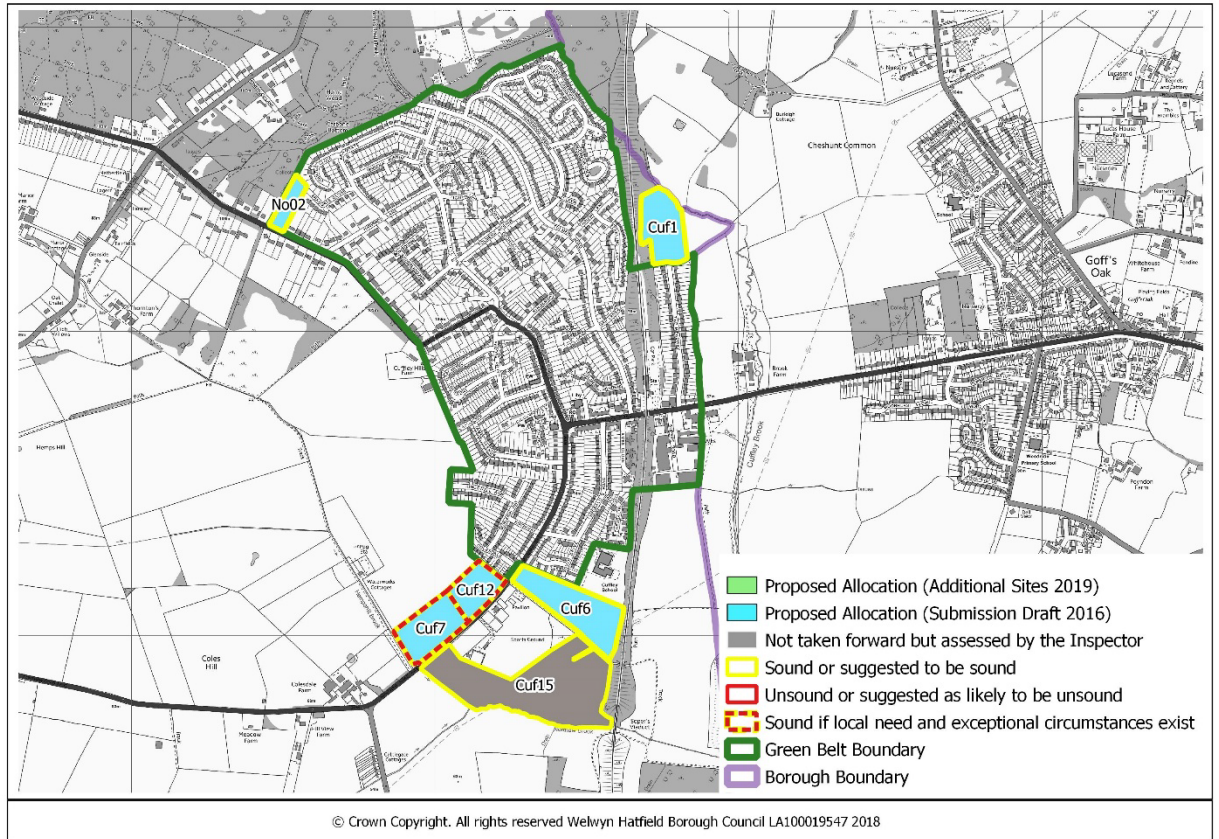
Settlement	Option C	Option D
Welham Green	540 dwellings + 2fe Primary School	441 dwellings
Bell Bar/Brookmans Park	828 dwellings	549 dwellings +2fe Primary School

- 14.3 Option C includes a new primary school at WeG15 with the residual land providing 56 dwellings. Option D includes a school at HS22 (BrP4).
- 14.4 Little Heath Primary is the closest school to sites in Little Heath. The education implications of development in Little Heath are discussed in the Little Heath section of this paper.

# 15 Northaw and Cuffley Parish

## Introduction

15.1 Northaw falls into the fifth tier of settlement in Policy SP3: Settlement Hierarchy. No sites were allocated in Northaw in the Draft Local Plan 2016 and no additional have subsequently been proposed for inclusion during the examination. Therefore, the remainder of this section refers solely to Cuffley. Cuffley falls into the third tier of settlements in Policy SP3: Settlement Hierarchy of larger villages excluded (inset) from the Green Belt, located in the south of the borough.



## Local Need for natural growth and Proportional distribution

15.2 The table below sets out what needs to be delivered in Cuffley to meet the local need and a proportionate distribution of the FOAHN.

Table 44 Natural growth and proportion of the FOAHN at Cuffley

Natural Growth	Proportionate FOAHN
132	611

## Completions and Commitments

15.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough’s housing supply towards meeting the FOAHN. Table 44 shows the completions and commitments at Cuffley.



*Table 45 Completions and commitments at Cuffley*

Completions 2016 - 2020	41
Commitments at 31 March 2021	34
Total	75

- 15.4 The completions and commitments total 75 dwellings meaning Cuffley needs to deliver an additional 57 dwellings to accommodate natural growth in the settlement. An additional 536 dwellings would need to be delivered to meet the proportionate FOAHN figure.

### **Allocations**

- 15.5 Six sites were proposed for allocation in the Draft Local Plan 2016 for Cuffley, totaling 299 dwellings. Site HS31, Land west of St Martin de Porres Catholic Church was found unsound by the Inspector.
- 15.6 Three of the submitted sites have been considered sound by the Inspector. Two sites have yet to be found sound, but may be, dependent on the final strategy adopted by the Council.

### **Sites found sound**

- 15.7 Since submission of the plan the capacity of three sites has changed. The capacity of HS26 (No02) has decreased from 8 to 5 dwellings to reflect the granting of planning permission. The number of dwellings at site HS28 (Cuf6) has increased from 108 to 121, following the submission of an outline planning application, for which there is a resolution to grant permission. HS27 (Cuf1) has increased from 30 to 60 following the Stage 8 Hearings.

*Table 46 Sites proposed for allocation at Cuffley*

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
HS26	(N02)	36 The Ridgeway & land to the rear	Urban	5
HS27	(Cuf1)	Land at The Meadway	Green Belt	60
HS28	(Cuf6)	Land south of Northaw Road East	Green Belt	121
Total				186

### **Sites that have yet to be found sound, but may be, dependent on the final strategy adopted by the Council**

- 15.8 The two sites that are yet to be found sound but maybe be subject to the final strategy are HS30 and HS29. Details are shown in the table below.

*Table 47 Sites that are yet to be found sound*

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
Cuf12	HS29	Land North of Northaw Road East	Green Belt	73
Cuf7	HS30	Wells Farm, Northaw Road East	Green Belt	75

Total	148
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15.9 The three sites proposed for allocation and found sound (186 dwellings), the two sites that have yet to be found but could be (148 dwellings) together with the completions and commitments (75 dwellings) total 409 dwellings.

15.10 This exceeds the natural growth requirement of 132 dwellings but is fewer dwellings than would meet a proportional requirement of 611 dwellings (-33%).

**Additional sites examined by the Inspector**

15.11 An additional site has been examined by the Inspector totaling an additional 176 dwellings. This site is set out in Table 47.

*Table 48 Additional Sites Examined at Cuffley*

Draft Local Plan 2016 (Site Ref)	HELAA 2019 (Site Ref)	Site Name	Urban / Green Belt	Number of Dwellings
N/A	Cuf15	Land southeast of KGV playing fields	Green Belt	176
Total				176

15.12 The addition of Cuf15 as an allocation would result in 585 dwellings, which is more in line with the proportional requirement of 611 dwellings (-4%).

**Option Analysis**

15.13 Option C: Proposes the inclusion of HS29, HS30 and addition of Cuf15.

15.14 Option D: Proposes the inclusion of HS29 and HS30.

**Site Analysis**

**Cuf12 Land north of Northaw Road East, and Cuf7 Wells Farm, Northaw Road East**

15.15 These two sites were not individually assessed in the stage 3 GB review but were assessed as a part of a much larger parcel to the north. Their harm rating was assessed as high. However, HS30, part of which is previously developed land, was separately assessed by the stage 2 review. It concluded that the site only made a partial contribution to the relevant GB purposes. It also found that to create a logical Green Belt boundary, HS29 would need to be developed at the same time.

15.16 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment of Cuf12 is included below:

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 6-10 years (moderate in favour)</li> <li>• GB3 Study (Purposes): The reduced area of Site Cuf12 forms a relatively small part of parcel P87. The wider parcel makes a significant contribution to one national purpose, a partial contribution to one national purpose and a limited/no contribution to one national purpose (moderate against).</li> <li>• Green Belt boundary: Overall, new Green Belt boundaries formed by Cuf12 would be predominately weaker than the existing boundary and the long northern boundary of Cuf12 would not be</li> </ul>
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	<p>defined by physical features (significant against). However, a reduced site area formed of the infill area between Cuf7 and the existing settlement boundary would form a more logical boundary, restricting development to the frontage with the B156. The northern boundary of a smaller infill site would still not be defined by existing physical features but the area concerned would be significantly less than the full length of the northern boundary associated with Cuf12.</p> <ul style="list-style-type: none"> <li>• GB3 Study (Harm): The wider parcel P87 has a distinct open rural character, with a prominent topography. The release of this is likely to result in high harm to the Green Belt due to its impact on the encroachment of the countryside, gap between settlements and result in a weaker boundary (Significant against). It should be noted that HS29 (Cuf12) is small part of this (south) parcel, with a relatively less prominent topography. When site's northern Green Belt boundary is established, it will be relatively enclosed between the urban edge and the existing/future new development on adjacent Site Cuf7. Hence, Site Cuf12 is likely to result in a lower level of harm, than wider P87.</li> <li>• SA: Seven significant positives and one significant negatives identified. This is more than three times more double positives than double negatives (significant in favour)</li> <li>• Flood Risk: Passes the sequential test.</li> <li>• Landscape Assessment: moderate - high (moderate against).</li> <li>• Strategic Advantages: Possibility of GP surgery (subject to viability) (minor in favour).</li> <li>• Strategic Disadvantages: None</li> </ul>
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15.17 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment of Cuf7 is included below:

<p>Site Selection Summary</p>	<ul style="list-style-type: none"> <li>• HELAA: Deliverable in 6-10 years (moderate in favour)</li> <li>• GB3 Study (Purposes): : Parcel makes a significant contribution to one national purpose, a partial contribution to one national purpose and a limited/no contribution to one national purpose (moderate against).</li> <li>• Green Belt boundary: Given its separation from the settlement boundary, it would not be logical to release Cuf7 as an isolated site by itself from the Green Belt and therefore additional land would need to be released to form a defensible Green Belt boundary (significant against). However, the potential exists to form a new, defensible Green Belt boundary by combining Cuf7 with part of Cuf12 (refer to Cuf12)</li> <li>• GB3 Study (Harm) The wider parcel has an open rural character, with a prominent topography. The release of this site is likely to result in high harm to the Green Belt due to its impact on the encroachment of the countryside, gap between settlements and resulting in a weaker boundary (Significant against).</li> <li>• SA: Seven significant positives and one significant negative identified. (significant in favour)</li> <li>• Flood Risk: Passes the sequential test.</li> <li>• Landscape Assessment: moderate - high (moderate against).</li> <li>• Strategic Advantages: None</li> <li>• Strategic Disadvantages: None</li> </ul>
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15.18 The Inspector notes the land slopes to the north and a landscaped strip along that boundary accompanied by appropriate earthworks, if carefully designed, could create a defensible boundary to screen the sites from the wider countryside Green Belt. Nevertheless, although part of the site contains dwellings set in large gardens, a building containing a design consultancy and some sheds, much of HS30 consists of paddocks,

which are not previously developed land and fundamentally from a Green Belt perspective are open.

- 15.19 The Inspector commented that the land slopes to the north and suggested that a landscaped strip along that boundary accompanied by appropriate earthworks, if carefully designed, could create a defensible boundary to screen the sites from the wider countryside Green Belt.
- 15.20 The Inspector considered that because of the topography and the existing hedge, both sites could be satisfactorily screened from the wider green belt. In consequence he did not consider a high harm assessment to be appropriate for these two sites.
- 15.21 In relation to allocating sites HS29 and HS30 the Inspector found that the justification of exceptional circumstances to remove these sites from the green belt will partly depend upon the relative amount of overall development that is justified at Cuffley and the deliverability of the other proposed sites, as well as site specific considerations. He concluded that the other sites currently before the Examination are sequentially better located than HS29 and HS30 from a movement perspective and considered these other sites all to be sound or capable of being made sound.

**Cuf15 Land to the south of King George V Playing Fields**

- 15.22 This site, which could accommodate 176 dwellings was not individually assessed by the stage 3 green belt study. A larger parcel that included land to the north, as well as some to the west of the railway, was all considered to have a rating of moderate-high. Subdivisions adjacent to the existing built development were rated as causing moderate harm to the GBs purposes if developed.
- 15.23 The site selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment of Cuf15 is included below.

Site Selection Summary	<ul style="list-style-type: none"> <li>• HELAA: Deliverable within 1-10 years (moderate in favour)</li> <li>• GB3 Study (Purposes): The site makes a significant contribution to one national purpose and a partial contribution to one national purpose (moderate against)</li> <li>• GB3 Study (Harm): Parcel 88 is moderate-high harm (moderate against)</li> <li>• Green Belt boundary: New Green Belt boundaries would be similar in strength to the existing boundary and would be clearly defined (moderate in favour)</li> <li>• SA: Identifies seven significant double positives and no significant double negatives (significant in favour)</li> <li>• Flood Risk: Site passes the sequential test, although a site-specific Flood Risk Assessment would be required to assess the risk posed from the Ordinary Watercourse</li> <li>• Strategic Advantages: None.</li> <li>• Strategic Disadvantages: None</li> </ul>
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**Further considerations**

*5 Year Land Supply and Delivery*

- 15.24 It is considered that Cuf15 will deliver some dwellings within the first 5 years of the plan period with remaining dwellings during the middle of the plan period, years 6-10. It will therefore partially contribute towards the 5 year land supply.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• 5YHLS: Delivery expected in the middle of the plan period years 6-10. (Moderate weight in favour)</li> </ul>
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*Locational Accessibility*

15.25 The Inspector has advised he considers the site Cuf15 to be sustainably located to access services and facilities. As this assessment is not considering several sites there is no comparable advantage of one site over another within the settlement.

Further Considerations – Weighting	<ul style="list-style-type: none"> <li>• Locational Accessibility: Site is within 400m of bus stops. (Significant in favour)</li> </ul>
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*Green Belt*

15.26 The site was assessed as contributing moderate harm to the Green Belt purposes. The Inspector considered that a new, defensible green belt boundary could be created. As this assessment is not considering several sites there is no comparable advantage of one site over another within the settlement.

*Policy considerations*

15.27 Site Cuf15 is only included in Option D. Should site Cuf15 be allocated the policy consideration identified below would need to be set in the table site specific considerations for this site.

Policy Considerations	<ul style="list-style-type: none"> <li>• Green Belt (mitigation) - A reduced developable area to exclude land to the south within Flood Zone 2 and 3 will limit the area of release, minimising the harm to the openness of the Green Belt. The impacts on the Green Belt can be mitigated through the provision of a defensible new Green Belt boundary of similar strength to the existing urban edge of Cuffley, using existing permanent landscape features</li> </ul>
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15.28 The Inspector stated that it was debatable to what extent this site alone would maintain the high-harm rating, if separately assessed. The area south-east of the electricity pylons probably would but to the northeast of these the built development associated with the adjacent recreation facilities and at Wells Farm, in addition to the pylons themselves, have a real impact on this part of the site and reduce the sense of openness.

15.29 In relation to the green belt boundary, the Inspector considered that a defensible green belt boundary could be created close to the southern boundary of the site and north of Northaw Brook. Additional planting could eventually minimise the impact of built development on the wider green belt to the south-west.

15.30 Other than adding to village congestion, no highway issues were raised. Any potential impact to heritage and ecological assets could be appropriately mitigated.

## **Settlement Summary**

### **Key Infrastructure Issues**

- 15.31 The 2019 Sites Selection Paper set out the key infrastructure issues by settlement as they were understood to be at that time. HCC have updated their advice to reflect the proposed increase in housing allocations in Cuffley, they have advised that educational demand from higher levels of housing than that proposed in the Draft Submitted Plan could only be accommodated through the relocation of the existing 2FE primary school in Cuffley to a larger site and expanding it by 1FE. To ensure there was a sufficient critical mass of demand to support the viability of a 3FE primary school, there would need to be a total of approximately 800 new dwellings coming forward in Cuffley. The County Council at this time has no certainty that the option to relocate and expand Cuffley Primary School is either deliverable or acceptable to the school. Source: Examination document EX264B.

### **Settlement Strategy Implications**

- 15.32 Cuffey is designated as a “large, excluded settlement” which is a third tier settlement in the settlement hierarchy, where there are large services centres, but a more limited range of employment opportunities than the two towns. Cuffley has a main line railway station served by the Hertford Loop Line which goes north via Hertford to Stevenage and south via Enfield in to London. Cuffley has a large village centre with a good range of shops and services and also has an allocated employment area and a primary school. As such, Cuffley is considered to be a sustainable location for housing development.
- 15.33 The addition of Cuf15 as an allocation would result in 585 dwellings, taking the number of dwellings in Cuffley closer to the proportional requirement of 611 dwellings.

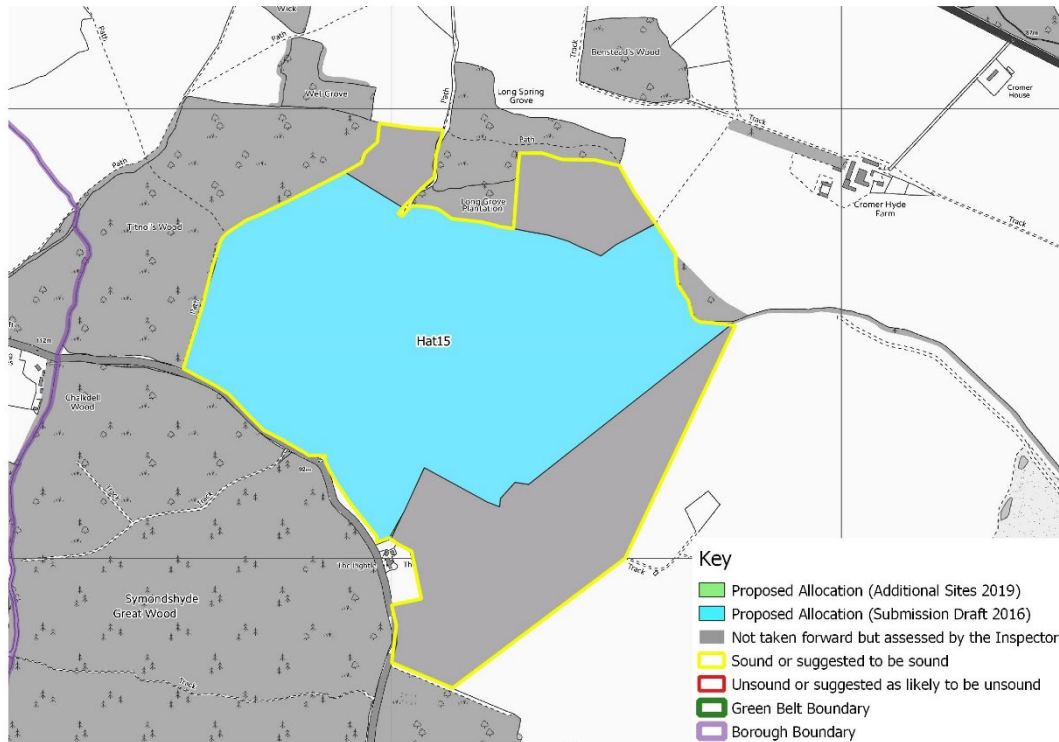
### **Summary / Conclusions**

- 15.34 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. Cuffley offers a range of services and facilities, including some employment opportunities and benefiting from good public transport connectivity including a mainline railway station into London and Stevenage.
- 15.35 The Inspector has considered that HS30 and HS29, although not yet considered to be sound, can be sound, subject to the final strategy. Both Option C and D include these sites. The inclusion of these two sites would bring the total number of dwellings in Cuffley to 409, which is under the proportionate need of 611.
- 15.36 Option C includes the addition of Cuf15. The Sustainability Assessment of Cuf15 found seven significant double positives and no significant double negatives, which is afforded significant weight in favour of the allocation of the site.
- 15.37 The addition of Cuf15 for 176 dwellings would result in 585 dwelling. This is still under the proportional requirement of 611 dwellings.

# 16 Symondshyde

## Introduction

16.1 The New Village at Symondshyde is proposed as a new Tier 4 ‘smaller excluded village’ excluded (inset) from the Green Belt and is therefore consistent with the Settlement Hierarchy, as set out in Policy SP3: Settlement Hierarchy.



## Local Need for natural growth and proportional distribution

16.2 The table below sets out what needs to be delivered in the Rural Areas to meet local need and a proportionate distribution of the FOAHN.

*Table 49 Natural growth and proportion of the FOAHN in Rural Areas*

Natural Growth	Proportionate FOAHN
137	635

## Completions and Commitments

16.3 Completed developments after 2016 and proposals with valid consents but have yet to be completed form part of the borough’s housing supply towards meeting the FOAHN. Table 49 shows the completions and commitments in the Rural Areas.

*Table 50 Completions and commitments in the Rural Area*

Completions 2016 - 2020	Commitments at 31 March 2021
16	68

16.4 The completions and commitments total 84 dwellings, meaning that an additional 53 dwellings are required to meet natural growth and an additional 551 dwellings would need to be delivered to meet the proportionate FOAHN figure.

### **Allocations found sound by the Inspector**

- 16.5 The Inspector has not yet found any of the three sites proposed for allocation in the Draft Local Plan 2016 in the wider rural areas of the borough to be sound. These include the Strategic site Symondshyde – new village SDS6 (Hat15) to provide 1,130 dwellings and HS33 (GTLAA08) Barbaraville, Mill Green providing 4 Gypsy and Traveller pitches.
- 16.6 As a consequence of the Stage 4 hearing session on Gypsy and Traveller provision it was agreed that the Gypsy and Traveller site HS34 at Coopers Green Lane would be removed from the plan and that the 10 pitches would be re-provided as follows: Symondshyde SDS6 6 pitches. North West Hatfield SDS5 increase in pitches from 11 to 15. The allocation at Symondshyde would therefore be amended to 1,136 to reflect the provision of 6 pitches.

### **Additional sites examined by the Inspector**

- 16.7 No additional sites were examined by the Inspector for allocation in the Rural Areas. The 2019 Site Selection process tested 11 additional sites or site options, in addition to re-appraising the three sites proposed in the Draft Local Plan 2016. 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. 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 site being 500 dwellings.

### **Option Analysis**

- 16.8 Only Option B excluded Symondshyde but this requires the inclusion of sites the Inspector has indicated would not be sound if they were not required to meet a local need and also results in poor levels of supply during the last five years. Symondshyde has therefore been included to varying degrees in Option C and Option D. Option C would result in the delivery of 500 dwellings at Symondshyde in years 11-15 of the Plan, with the remaining allocation of 1,000 dwellings as safeguarded land, for delivery beyond the Plan period of 15 years. Option D would see the delivery of the full 1500 dwellings within the 15-year Plan period.

### **Site Analysis**

- 16.9 This site was discussed at length at two hearing sessions. In the Inspector's Interim Report, he came to the conclusion that (paras. 84-95) the submitted evidence suggested that if the overall housing requirement can only be met by the establishment of a new village within the borough, then an expanded village on this site would appear to be the most appropriate solution.
- 16.10 Having heard all of the evidence, the Inspector is satisfied that a viable, regular and frequent public transport system could be established, as well as viable local services and facilities, commensurate with a development of 1,500 or more.
- 16.11 The extended area includes an area north-east of Furzefield Wood, the eastern boundary interfacing with the proposed Green Corridor. Whilst the northern part of this



extension includes a triangular area rated as resulting in high harm to the GBs purposes if developed, the area was not independently assessed but the much larger parcel 44 was rated as high harm overall. Adjacent land that was assessed in sub-parcels was considered to only cause moderate-high harm. The area has recently been quarried. Its topography has changed, as has its interface with the wider GB to the north-east. Any revisions to this site should include the land between Long Grove Plantation and PF50, as well as the land between that wood and Wet Grove, both of which topographically relates to Symondshyde. They should be either included in the development proposal or safeguarded for later development, a means of access from the main Symondshyde development being secured through the policy criteria.

- 16.12 Nevertheless, the Inspector found that there are sites, adjacent to some of the villages, with frequent public transport and where most local facilities are within easy walking distance. Some of these are more sustainable than a new village at Symondshyde would be. Some of them would also result in lower harm to the GB's purposes. However, the sustainability credentials of this location are likely to be better than those at a number of the examined sites that do not have a range of public transport. The development of some of them would also be more harmful to the GB.
- 16.13 The Inspector concluded that the Council should reassess the evidence and reconsider whether or not a new village at Symondshyde is a justified component of its settlement strategy and if it considers it to be so, to what extent development should take place there during this plan period as opposed to subsequently, in the form of the allocation of future safeguarded land
- 16.14 The Site Selection 2019 assessed the advantages and disadvantages of each site. A summary of the assessment of site HAT15 is included below.

<p>Site Selection Summary – Weighting</p>	<ul style="list-style-type: none"> <li>• HELAA: The site could come forward within years 5-15 years of the plan period (moderate/minor in favour).</li> <li>• GB3 Study (Purposes): The site makes a significant contribution to one national Green Belt purpose and partial contribution to local purpose (moderate against).</li> <li>• GB3 Study (Harm): P43 (a) Moderate to high harm, if release of stage 2 site Hat15, result of containment between two urban areas.</li> <li>• GB Boundary: New boundaries formed by physical features defining Hat1 are mixed in terms of strength. Whilst the northern boundary would be strong, much of the southern boundary would be weaker than the existing (distant) boundary and care would be needed to prevent merging with the north of Hatfield (minor against).</li> <li>• SA: The site has twice as many significant positives as significant negative (moderate in favour).</li> <li>• Flood Risk: Passes the sequential test</li> <li>• Landscape Assessment: moderate – high (moderate against)/ low – moderate (moderate in favour)</li> <li>• Strategic Advantages: Delivery of a primary school, shop and community building alongside housing growth (moderate in favour).</li> <li>• Strategic Disadvantages: none</li> </ul>
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### Key Infrastructure Issues

- 16.15 The Site Selection Background Paper 2019 details the key infrastructure issues in relation to the proposed allocation of a new village at Symondshyde. An increase to 1500 dwellings would require a 3fe primary school located within the new village. As identified in the Inspector's Interim Report (EX212) the Inspector concluded that an increase in the development's critical mass would make facilities and services more viable. The additional work has demonstrated, to the Inspectors satisfaction, that a

viable public transport system, with frequent services, could be eventually established, if a higher critical mass of residents could be achieved. Also, the evidence suggests that a larger population would provide the potential to offer a real and viable movement choice to the private car.

## **Further Considerations**

### *Five Year Land Supply and Delivery*

- 16.16 Symondshyde is included in both Option C and Option D, due to being required to address housing supply issues in the last 5 years of the Plan period. Option C would result in the delivery of 500 dwellings at Symondshyde in years 11-15 of the Plan, with the remaining allocation of 1000 dwellings as safeguarded land, for delivery beyond the Plan period of 15 years. Option D would see the delivery of the full 1500 dwellings within the 15-year Plan

### *Locational Accessibility*

- 16.17 The sustainability of the site was discussed during the hearing sessions and the Inspector wrote to the Council in March 2020 following the hearing session in March 2020, setting out his interim findings on this site. He had concerns about its overall sustainability but particularly from a travel perspective. He therefore requested that additional work be carried out on the sustainability of the site.
- 16.18 The findings of this work suggests that the development area could be extended, particularly towards Hatfield but only as far as the north-western boundary of the proposed Green Corridor. This would enable a larger number of dwellings to be constructed. The Inspector considered that such an increase in the development's critical mass would make facilities and services more viable. The Inspector was satisfied that a viable, regular and frequent public transport system could be established, as well as viable local services and facilities, commensurate with a development of 1500 or more dwellings.

### *Green Belt*

- 16.19 The Inspector expressed concerns that the site had been promoted and assembled for development on the basis of ownership boundaries, rather than the relative harm of individual parcels of land to the GB's purposes and openness. The Inspector asked the Council to Council give further consideration to the optimum extent of the development site, in the context of the varying harms to the GB, the extent to which any visual harm to the wider GB could be appropriately screened and the development's interface with the Green Corridor. Additionally, along with Hertfordshire County Council, the Council were asked to look at the viability of the proposed public transport and the optimum level of development needed to establish viable services in the context of the GB location.
- 16.20 As a result of this additional work, the Inspector was satisfied that that a viable, regular and frequent public transport system could be established, as well as viable local services and facilities, commensurate with a development of 1500 or more dwellings. However, this quantum of development would necessitate the release of further land for development from the Green Belt.
- 16.21 The extended area includes an area north-east of Furzefield Wood, the eastern boundary interfacing with the proposed Green Corridor. The northern part of this extension includes a triangular area which was not independently assessed but falls within the much larger parcel 44 which was rated as high harm overall. Adjacent land

that was assessed in sub-parcels was considered to only cause moderate-high harm. This area has recently been quarried. Its topography has changed, as has its interface with the wider GB to the north-east.

- 16.22 The Inspector stated that any revisions to this site should include the land between Long Grove Plantation and parcel PF50, as well as the land between that wood and Wet Grove, both of which topographically relates to Symondshyde. They should be either included in the development proposal or safeguarded for later development, a means of access from the main Symondshyde development being secured through the policy criteria.

### **Settlement Strategy Implications**

- 16.23 A new village at Symondshyde would be a Tier 4 small, excluded village consistent with Policy SP3 Settlement Strategy and Green Belt boundaries, delivering a small service centre and a limited range of local employment opportunities, services and facilities. As such, it would be comparable to other small excluded villages such as Woolmer Green, Oaklands & Mardley Heath, Little Heath and Digswell.

### **Summary/Conclusions**

- 16.24 The number of dwellings to be delivered at the Draft Local Plan 2016 site SDS6 (Hat15) Symondshyde may be increased from 1,130 to 1,500 as the Inspector considers that this greater quantum of development would support the establishment of a viable, regular and frequent public transport as well as viable local services and facilities. Not of all of this larger site would be required during the plan period with the larger area providing safeguarded land beyond the current Local Plan period. This would however necessitate the release of the larger site from the Green Belt.
- 16.25 The Inspector came to the conclusion that a larger Symondshyde (1,500 dwellings) is capable of being found sound but cautions that some sites adjacent to the villages, with frequent public transport and where most local facilities are within easy walking distance are more sustainable and some of them would result in lower harm to the green belt. He has stated that these should be selected for development before a new village is allocated at Symondshyde.
- 16.26 The only other site proposed for allocation in the submitted plan in the wider rural areas is a small extension to an existing Gypsy and Traveller site located at Barbaraville. This was proposed for removal by the Council in November 2020 as this site falls within a 'very high' harm parcel. The proposal is a small extension to an existing site and the Inspector has yet to conclude on its soundness.
- 16.27 It is proposed that the new village settlement SDS6 (Hat15) is excluded (inset) from the Green Belt. Option C proposes its inclusion for 500 dwellings during the plan period and the remaining 1,000 dwellings after 2036. Option D proposes the entire allocation should come forward during the plan period.

## 17 Boroughwide Conclusions

### Distribution

- 17.1 The Settlement Strategy which is set out in Policy SP3 of the draft submitted Plan 2016 requires most of the development to be located within and adjoining the two towns, whilst more limited development compatible with their scale and character is to take place in and around the excluded (not in the Green Belt) villages.
- 17.2 The Inspector in his supplementary report has concluded that the potential to meet the borough's development needs in or adjacent to the two main towns and within the excluded villages, has been largely exhausted.
- 17.3 Therefore, the remainder of the housing requirement must be met in locations adjacent to the excluded villages, possibly supplemented by the release of land for the construction of a new village at Symondshyde.
- 17.4 Most villages will need to deliver more than the local need for natural growth or it will not be possible to meet the FOAHN. The Inspector has indicated that the distribution should be proportionate but tempered towards the 'tier 3' settlements and those villages with stations. These are:
- Tier 3 – Welwyn, Welham Green, Brookmans Park and Cuffley
  - Villages with stations – Digswell, Welham Green, Brookmans Park and Cuffley
- 17.5 The following Tables sets out the Options per settlement together with their respective natural growth and proportionate FOAHN requirement and an analysis by Settlement Hierarchy. The figures include completions since 2016 and commitments as well as proposed allocations.

*Table 51 Option Analysis by Settlement*

	Option A	Option B	Option C	Option D	Local need target
WGC	6,525	6,525	6,525	6,525	1,464 -6,797
Hatfield	3,596	3,596	3,596	3,596	995 – 4,621
Woolmer Green	227	286	261	261	43 - 201
O&MH	86	86	86	86	89 - 413
Welwyn	254	502	502	254	112 - 490
Digswell	104	140	124	104	47 - 206
Lemsford	0	27	27	0	7 - 30
Stanborough	19	117	19	19	9 - 41
Welham Green	368	540	540	441	96 – 419
Brookmans Park & Bell Bar	421	828	724	549	109-506
Little Heath	104	204	104	104	34 -158
Cuffley	409	585	585	409	132-575
Symondshyde	1500	0	500*	1500	n/a
Rural Areas	84	84	84	84	137 -588

Notes: \*Symondshyde, Option C, 1000 dwellings to be delivered post 2036

*Table 52 Option Analysis by Settlement Hierarchy*

Settlement Hierarchy	Option A	Option B	Option C	Option D	OAN target
Tier 1 and 2 Towns	10,121	10,121	10,121	10,121	11,418
Tier 3 large villages	1,452	2,471	2,367	1,653	1,990
Villages with Stations	1,302	2,093	1,989	1,503	1,706
Tier 4 villages	521	743	575	555	978
New Tier 4 village - Symondshyde	1,500	0	500	1,500	n/a
Welwyn Parish	444	728	712	444	Local need 244 –1,109

- 17.6 The Natural Growth figure is considered to provide a minimum ‘to find’ figure required to meet local need. The proportionate FOAHN figure is provided not as an absolute maximum but a basis for identifying what then might be considered a disproportionate distribution.

*Five Year Land Supply and Housing Distribution*

- 17.7 The Inspector has advised that there must be a Five Year Housing Land Supply (+ 20%) from adoption. Also, a proportionate spread of housing throughout plan period

*Table 53 Housing Delivery*

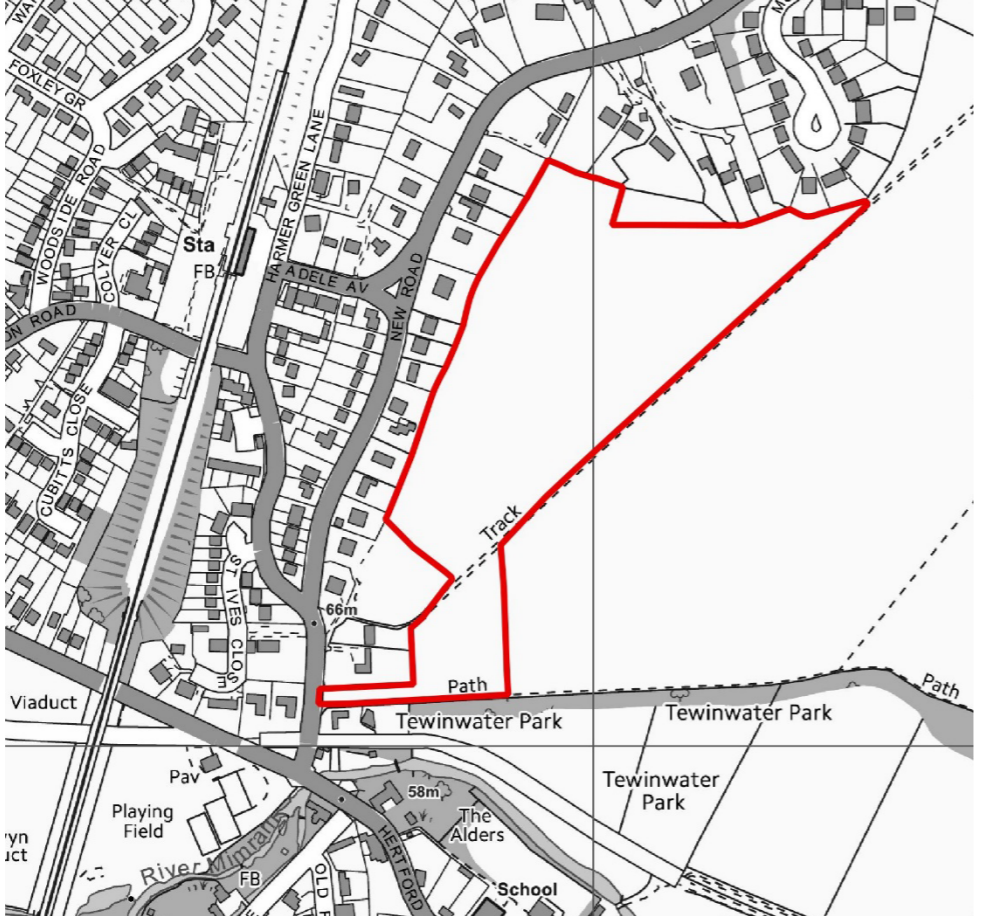
Timing of housing delivery	0-5 years	6-10 years	11-15 years	Total	Overall Total*
Option A	4,470	5,541	2,854	12,865	15,379
Option B	5,046	5,501	2,157	12,704	15,218
Option C	4,779	5,409	2,657	12,831	15,359
Option D	4,604	5,596	2,907	13,093	15,614

\*The overall total figure includes completions, commitments, windfall and small sites allowance, as well as allocations.

- 17.8 It is evident from the analysis of Option B that the reduction in size of Birchall Garden Suburb along with the option of removing Symondshyde have a significant impact on delivery of sites in the last five years of the plan period. Furthermore Option B includes sites which the Inspector has expressed concerns over unless justified by local need. It would also require a disproportionate level of growth at Stanborough which has no service or facilities and is in the lowest level of the settlement hierarchy.
- 17.9 It is therefore considered that at least part of Symondshyde will be required to come forward during the plan period. Therefore, Symondshyde has been included in both options with Option C having more limited growth during the plan period, and the remainder of the settlement coming forward after the end of the plan period.
- 17.10 Option D seeks to improve the performance of Option A by increasing the number of sites in the five year land supply. It seeks to deliver sufficient housing to meet local need with more growth being directed to those settlements higher in the hierarchy or with

stations. It seeks to reduce growth in some settlements to provide greater protection to heritage and environmental assets by reducing levels of growth. It therefore better meets the strategy set out in the Local Plan as well as providing more development at the end of the plan period. Furthermore, it will allow the strategy set out in the draft submitted plan for the provision of Gypsy and Traveller sites to remain largely unaltered.

- 17.11 Option C seeks to improve the performance of Option B by improving supply in the last 5 years therefore providing better protection for the Green Belt than Option B. The distribution is more heavily weighted towards the tier 3 settlements and those villages with stations than option D, with the consequence that some of those settlements take significantly more than their proportionate share, in particular Brookmans Park. The approach for the provision of Gypsy and Traveller pitches would also need to be reviewed as the strategy in the plan is based on sites coming forward in the strategic allocations with the need being apportioned based on the size of the allocation. If Symondshyde is not to be allocated or comes forward as a smaller allocation, the pitches would need to be reassigned. Panshanger has grown in size, so it would seem appropriate to increase the allocation. There is potential to increase the allocation from 6 to 12 pitches, but this would still leave a shortfall.
- 17.12 Both options C and D are based on assumptions for increases in capacity for some sites which the Inspector has already assessed as sound. In most cases the Inspector has expressed views on the potential for increasing capacity on sites. However, the session on the SDS3 allocation on Broadwater Road known as the Wheat Quarter took place before the decision in November 2020 to increase the capacity of these sites. These have yet to be determined and are unlikely to receive a decision before the Council has agreed to go back to the Inspector. It would therefore seem prudent to allow for some flexibility. Option D already has a buffer of 400 dwellings. There is a bigger shortfall with Option C but this could be made up by increasing the allocation at Symondshyde. This would result in better outcomes in terms of the delivery of infrastructure during the plan period and allow for the strategy for the provision of Gypsy and Traveller provision to remain largely unaltered.
- 17.13 It is considered that, on balance, Option D provides a distribution more closely aligned to the vision and objectives, and the spatial strategy set out in the submitted plan.

Site reference: Dig1 Site Name: Land east of New Road			Settlement: Digswell Housing & Employment Land Availability Assessment	
			<p><b>Urban/Green Belt:</b> Green Belt</p> <p><b>PDL/Greenfield:</b> Greenfield</p> <p><b>Achievable:</b> Yes</p> <p><b>Estimated capacity:</b> 130 dwellings (but found unsuitable).</p> <p><b>Impacts/constraints requiring mitigation:</b></p> <ul style="list-style-type: none"> <li>Mitigate impact on heritage assets (RPG to south and Digswell Viaduct), a Heritage Statement/Impact Assessment required at planning application stage.</li> <li>Avoid and mitigate impacts on the amenity of adjacent properties along New Road</li> <li>Potential for archaeological interest on site. Archaeological Assessment required at either pre-application or pre-determination stage.</li> <li>Wastewater infrastructure upgrades required</li> </ul> <p><b>Delivery timescales:</b> 1-5 / 6-10 years</p>	
Green Belt Study Review (Parts 1, 2 and 3)	Green Belt Boundary Appraisal	Sustainability Appraisal	Flood Risk Sequential Test	Strategic advantages and disadvantages
<p><b>GB1 (Site falls within Parcel 55)</b> Parcel 55 makes a significant contribution towards safeguarding the countryside, preserving the setting of Welwyn Garden City and Tewin Water, and maintaining the existing settlement pattern (providing the gap between Welwyn Garden City and Digswell). Partial contribution towards preventing merging.</p> <p><b>Site not covered by GB Stage 2 Study</b></p> <p><b>GB3 (Parcel 17 – High harm):</b> The parcel makes a significant contribution to safeguarding the countryside from encroachment as the land is undeveloped arable fields lacking any urbanising features. Partial contribution is made to preventing the merging of neighbouring towns (Stevenage &amp; Welwyn Garden City).</p>	<p><b>Existing:</b> The site is currently washed over by the Green Belt. The existing Green Belt boundary of Digswell Village lies along the rear gardens of properties along New Road. (moderate)</p> <p><b>Proposed:</b> The proposed boundary would not be defined by any existing physical boundary. (weak)</p> <p>Development would be constrained to the southern part of the site and it would be essential to provide a landscape buffer to the north and east; this is required mitigate the impact of the development on the wider landscape and the RPG to the south.</p>	<p><b>Significant positives (++/++?) Total: 7</b></p> <p><b>4.2 Significantly reduce greenhouse gas emissions from transport and; (x2)</b></p> <p><b>4.3 Avoid and reduce air pollution (x2)</b></p> <p>This site is within walking distance of Welwyn North Railway Station/WGC Employment Area and 400m of a bus stop on a route providing a six day a week service.</p> <p><b>5.1 Provide the right amount, type and tenure of housing to meet identified local needs? (x2)</b></p> <p>The site could accommodate 35% affordable dwellings and 20% accessible and adaptable dwellings.</p>	<p><b>Sequential Test result:</b> Pass – within Flood Zone 1</p>	<p><b>Advantages:</b> Contribution to local need for housing in Welwyn Parish.</p> <p><b>Disadvantages:</b> None</p>

<p><b>Assessment of Potential Harm (relevant scenarios): P17a - Moderate-high harm</b>          This scenario concerns the release of the full extent of site Dig1. Notes that development up to the ridge crest would be consistent with existing settlement form, but there is no distinction to the expanse of arable land beyond. Any new development here would lack the containment by tree cover that characterises the existing settlement.</p>		<p><b>6.6 Provide access to training, skills development and lifelong learning to meet identified needs.</b>          The site is within straight line walking distance (1,400 m) of local education facilities</p> <p><b>Significant negatives (- -/- -?) Total: 1</b></p> <p><b>4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?</b>          The site is adjacent to GII Tewin Water Registered Park and Garden and is within 250m – 1000m of 15 Grade II Listed Buildings and one Grade II* Listed Building (Viaduct).</p>		
<p><b>Summary:</b>  <b>HELAA:</b> Deliverable within 1-5 years (<b>Significant in favour</b>) potential for some dwellings to be delivered in mid-part of the plan period if larger capacity is delivered.  <b>GB3 Study (Purposes):</b> The wider parcel (P17) makes a significant contribution to one national purpose and partial contribution to one national purpose (<b>Moderate Against</b>)  <b>Green Belt boundary:</b> Proposed boundaries would be predominantly weaker than the existing boundaries, the boundary would not being clearly defined or defensible by existing features. (<b>Significant against</b>)  <b>SA:</b> More than 3 times double positives (++/++?) than double negatives (--/--?) (<b>Significant in favour</b>)  <b>Flood Risk:</b> Passes the sequential test  <b>Landscape Assessment:</b> Moderate (<b>Neutral</b>)  <b>Strategic Advantages:</b> Contribution to local need for housing in Welwyn Parish.  <b>Strategic Disadvantages:</b> None.</p>				
<p><b>Calverton Test</b>          The harm to the Green Belt would be moderate – high if this site were released. The revised Green Belt boundary would be logical, clearly defined and defensible with the use of landscaping which is required to screen development along its eastern boundary to mitigate harm to the GII RPG to the south.</p>				
<p><b>Overall Conclusion</b>          This site presents an opportunity to make provision for housing within the first five years of the Plan and would contribute to the local need for housing in this area. Release of the site would result in moderate – high harm to the Green Belt and the revised boundaries with the implementation of a strong landscape buffer would be clearly defined and defensible. The site is well located for local transport links including the railway station at Welwyn North. There is a need for this site to be carefully designed to ensure that harm to the wider countryside and surrounding heritage assets (GII RPG to the south and GII* Viaduct to the southwest) is limited as much as possible. It is considered that the requirement to meet the local need for housing in the area outweighs the harm to the Green Belt and surrounding heritage assets, assuming these are mitigated to the lowest possible extent, development in Digsweil would contribute housing numbers in a sustainable location. It is considered that the site is suitable for allocation for between 80 - 100 dwellings.</p>				
<p><b>Policy Implications</b>          If the site is allocated, the following would be required - amend Green Belt boundaries.</p>				



# Welwyn Hatfield Local Plan

## Five Year Housing Land Supply and the Housing Trajectory

December 2021



## Five Year Housing Land Supply and the Housing Trajectory

### 1. Introduction

- 1.1 The following information has been prepared in response to the Inspectors letter EX271 and Supplementary Report EX272. In this letter, the Inspector requests evidence that the Council will have a five-year housing land supply on adoption, and that if a stepped trajectory is required this should be accompanied by a sound justification. In the supplementary report, the Inspector also states that 'the housing trajectory should ensure, as far as possible, the delivery of the proportionate amount of housing supply throughout the plan period'.
- 1.2 The Inspector has also confirmed (in EX274) that 2018-based household projections represent a meaningful change, justifying a reduction in the housing target from 16,000 dwellings (800 dwellings per annum) to 15,200 dwellings (760 dwellings per annum) for the plan period 2016 – 36.
- 1.3 This update to the five year housing land supply position and trajectory has been prepared based on the revised target of 760 dwellings per annum.

### 2 Five Year Requirement

- 2.1 The first years of the plan period have already elapsed and housing delivery has been below target resulting in a shortfall. The table below shows the shortfall since the start of the plan period in 2016/17. Against the target of 3,800 dwellings, 2,514 dwellings were delivered up to 31 March 2021. This shortfall will need to be made up in future years.

**Table 1: Shortfall 2016/17 – 2020/21**

Target 2016/17 - 2020/21 (760 x 5)	3,800
Completions 2016/17 - 2020/21	2,514
<b>Shortfall 2016/17 - 2020/21</b>	<b>1,286</b>

- 2.2 Under the more stringent Sedgefield method previous under delivery is made up in the first five years, whilst under the Liverpool method the past shortfall is made up across the entire plan period. The five year housing requirement for Welwyn Hatfield has been presented in table 2 under both the Liverpool and Sedgefield method for calculating housing land supply. The requirement for the first five years in both methodologies also includes a 20% buffer as required by the NPPF, reflecting persistent under delivery of

housing in Welwyn Hatfield against this target. This additional 20% is moved forward from later in the plan period, so the total overall target remains at 15,200.

- 2.3 Table 2 below sets out the calculation of the five year requirement taking into account both the shortfall and the requirement for a 20% buffer using both approaches.

**Table 2: Five Year Housing Requirement**

		<b>Liverpool</b>	<b>Sedgefield</b>
A	Annual Housing Target	760	760
B	Five Year Requirement (A x 5)	3,800	3,800
C	Forecast under delivery 2016 - 2021	$(1,286/15 = 85.73) * 5$ years = 428.67	1,286
D	20% Buffer (B x 20%)	760	760
<b>E</b>	<b>Five Year Requirement</b>	<b>4,989</b>	<b>5,846</b>

- 2.4 Whilst the Sedgefield method for making up shortfall could be considered more robust at standing up in appeal, in neighbouring authority East Herts the Inspector adopted an approach making up the shortfall over a 10 year period, and in North Herts shortfall will be made up across the entire plan period (the Liverpool method). Both of these authorities also face Green Belt constraints similar to Welwyn Hatfield.

- 2.5 An alternative approach could be to make up the shortfall in the middle part of the plan period resulting in it being accommodated more quickly than in the Liverpool methodology. This would require the setting of a stepped target to ensure that the assessment of the five year land supply and the assessment of housing delivery takes this phased approach into account.

**Table 3: Five Year Housing Requirement – Alternative Approach**

		<b>Alternative Approach</b>
A	Annual Housing Target	760
B	Five Year Requirement (A x 5)	3,800
C	Forecast under delivery 2016 - 2021	0 ( 1,286 undersupply carried forward to years 6-10)
D	20% Buffer (B x 20%)	760
<b>E</b>	<b>Five Year Requirement</b>	<b>4,560</b>

- 2.6 These three approaches would then result in different targets for the remainder of the plan period as set out in Table 4.

**Table 4: Plan Period Targets**

<b>Plan period</b>	<b>Sedgefield approach</b>	<b>Liverpool approach</b>	<b>Alternative approach</b>
2016/17- 2020/21	2,514	2,514	2,514
2021/22- 2025/26	5,846	4,989	4,560
2026/27- 2030/31	3,800	4,229	5,086
2031/32 -2035/36	3,040	3,469	3,040

### **3 Housing Supply**

- 3.1 While the Submitted Draft Local Plan relied on a stepped target to achieve a 5 year housing land supply, many of the additional sites submitted to the examination since, as well as the sites not submitted but recently examined by the Inspector in the Stage 9 hearing sessions could contribute, or contribute in part to the five year housing land supply.
- 3.2 There are 70 sites which have been examined which are potentially sound. When taking an optimistic view on delivery forecasts, 58 of these sites could potentially contribute to delivery in the first five years following adoption. If *all* of these 58 sites were included, supply in years 1-5 would total **5,316** dwellings. Therefore it would not be possible for the Council to meet the five year housing land supply under the Sedgefield methodology. The Council would fall short of the required 5,846 dwellings by 530 dwellings, thus resulting in a supply of only 4.5 years. If the Sedgefield methodology were to be used then a stepped target would be required in order to achieve a five year housing supply.
- 3.3 However, under the Liverpool methodology, when including all 58 sites which could potentially contribute to delivery in the first five years following adoption, it would be possible to meet the five year housing land supply requirement without a stepped trajectory. In this scenario, which would include all sites which have come forward in and around the villages, supply would be 327 dwellings above the required 4,989 dwellings, and would result in a housing land supply of 5.3 years. Whilst under the Alternative Approach the surplus would increase to 756 dwellings and result in a supply of 5.8 years.

- 3.4 However, it should be noted that this is based on a more optimistic view of delivery rates, which includes 140 completions from the sites in Welwyn (Wel1, Wel2, Wel15) within the five years. This is considered quite optimistic given the required highways upgrades and new bridge as well as various other factors outlined in the HELAA assessments and possible legal issues associated with a proposed village green designation. The Inspector has indicated in paragraph 41 of his Supplementary Report EX278 that some sites might have longer lead in times because of site assembly or access issues. Taking into account these comments the Council considers delivery in years 6-10 more likely for these sites. In addition, this also assumes 125 dwellings at BrP4 will deliver in years 1-5. The requirement for a new footbridge across the railway and access road make this quite optimistic. A more cautious forecast would be completions at this site starting in the middle part of the plan period and completion in the last 5 years. If forecast delivery at these sites was pushed back then the Council would meet the requirement under the Liverpool methodology by just 62 dwellings, resulting in a housing land supply of 5.1 years. Under the Alternative Approach this would be exceeded by 491 dwellings and result in a supply of 5.5 years. Appendix 2 sets out revised delivery rates based on these assumptions.
- 3.5 Whilst it is possible for Welwyn Hatfield to meet the five year housing requirement without a stepped target under the Liverpool and Alternative Approach methodologies, there would be a number of implications in terms of the housing trajectory and other requirements set. These consequences are considered in the next few paragraphs.

#### **4 Consequences of prioritising five year land supply over other considerations**

##### Reliance on very high delivery rates in years 4 & 5

- 4.1 Supply in the first three years of the plan period from adoption will largely be made up of commitments and urban local plan sites which already have planning permission granted or an application submitted. As discussed at the hearing sessions it is generally not expected that Green Belt sites would start delivering housing completions until at least year 4 of the plan period following adoption. For the larger strategic sites, infrastructure and other constraints may also impact on lead-in times earlier in the plan period. Analysis on delivery timescales at historical sites in the borough shows that the time from a planning application being submitted to construction commencing takes on average just under two years.
- 4.2 Considering these factors, delivery would not be expected to reach (and exceed) the target until year 4. Therefore, in order to achieve a five year housing land supply on

adoption without a stepped target this would rely on a very high level of housing delivery in years 4 and 5 of the plan. As discussed in paragraph 4.1, years 1-3 of the plan period will consist largely of commitments and urban sites which already have planning applications granted or submitted. This means that delivery in years 4 and 5 would need to average just over 1,650 dwellings each year in order to meet the five year requirement under the Liverpool method.

- 4.3 In addition, whilst the evidence submitted to the examination currently indicates that many sites are deliverable or partly deliverable in years 1-5, in reality the market may well deliver a slower build out rate than evidence submitted to the examination currently points to. Monitoring of historical completions since 2001 shows that the highest level of delivery in a single year was 812 dwellings in 2003/04, this is well below (approximately half) the required 1,650 needed in years 4 and 5 to meet the five year requirement without a stepped trajectory.

Proportionate amount of delivery throughout the plan period

- 4.4 The 58 sites that have potential to contribute to the five year housing supply amount to 9,549 dwellings and include 17 sites which also contribute to delivery later in the plan in years 6-15. The forecast distribution of delivery for these sites across the plan is presented in table 5 below. The table also splits out commitments, windfall and urban sites which are not expected to deliver in years 1-5, however will contribute to delivery in years 6-15. The total of these components is 15,086 dwellings (just 98 dwellings below the OAN). Green Belt sites not contributing to the five year supply are also presented separately.

**Table 5: Housing Supply – All sites examined\***

	<b>1-5</b>	<b>6-10</b>	<b>11-15</b>	<b>Total</b>
All sites contributing to 5 year supply (GB & Urban)	4,243	4,226	1,080	<b>9,549</b>
Urban sites <i>not</i> contributing to 5 year supply	N/A	264	271	<b>535</b>
Commitments + Small sites	795	17	8	<b>820</b>
Windfall	278	695	695	<b>1,668</b>
Completions 2016 - 2021				<b>2,514</b>
<b>Sub- Total</b>	<b>5,316</b>	<b>5,202</b>	<b>2,054</b>	<b>15,086</b>
Target/Requirement (Liverpool)	4,989	4,229	3,469	
Dwellings above/below target	+327	+973	-1,415	
Target/Requirement (Alternative)	4,560	5,086	3,040	
Dwellings above/below target	+756	+116	-986	
Green Belt sites <i>not</i> contributing to 5 year supply	N/A	816	800	<b>1,616</b>
<b>Total</b>				<b>16,702</b>

\*See Appendix 1 for sites detail

#### Overprovision in the middle years of the plan period

- 4.5 The scenario set out in Table 5 is based on 58 sites contributing to the five year land supply and shows that there is large over supply in the middle part of the plan period, with supply in years 6-10 totalling 5,202 dwellings. This is well above the 4,229 required under the Liverpool methodology or the 5,086 required under the Alternative Approach for this period. However, there are very few sites delivering in years 6-10 which do not also contribute to the five year land supply. The majority of sites expected to start delivering after year 5 are urban sites therefore their removal would not comply with the sequential approach.
- 4.6 The Green Belt sites not contributing to 5 year supply and delivering in years 6-10 include Marshmoor, Wel6 and Symondshyde. The scenario set out in Appendix 2 is based on 56 sites contributing to the five year land supply. This assumes that the additional Welwyn sites (Wel1, 2, 15) are slower to come forward and would also fall entirely within years 6-10 and HS22 (BrP4) would fall between years 6-15.

#### Lower levels of delivery in the later years of the plan

- 4.7 Delivery in years 11-15 was forecast to total 2,897 dwellings in the submitted plan. However, as a result of the reduction in dwellings at Birchall Garden Suburb SDS2 (WGC5) and if the removal of Symondshyde were to be confirmed then this number would be considerably reduced, with just 2,054 dwellings expected to deliver in the last five years of the plan (based on the assumptions in Appendix 1). The Inspector has indicated that lower delivery towards the end of the plan period is not in the interests of the long term protection of the Green Belt as there would be a need for early release of more land towards the end of the plan period in order to maintain a 5 year housing supply.
- 4.8 The inclusion of sites not contributing to the five year land supply including Symondshyde would improve supply in the latter years of the plan, which would increase to a maximum total 2,854 dwellings (based on the assumptions in Appendix 1), just 186 dwellings below the 3,040 target under the Alternative and Sedgefield approach and 615 dwellings below the 3,469 under the Liverpool approach. This would result in the FOAHN target being exceeded as almost all sites contributing to the five year supply would still need to be included in order to maximise delivery in the first five years unless the Alternative Approach is adopted.

### Distribution of development across settlements

- 4.9 Meeting the five year housing land supply without a stepped target requires almost all of the sites to come forward around the villages, which would result in disproportionate development in some settlements. Meeting the five year requirement may also result in the inclusion of some sites which are less sustainable in terms of facilities, services and transport in order to meet the five year requirement, for example the inclusion of sites in Stanborough and Lemsford.

## **5 Housing Delivery Test**

- 5.1 Under a target of 760 dwellings per annum, the Council would remain in presumption of sustainable development for the first three years following adoption of the plan as the Housing Delivery Test result would remain below the 75% threshold. As discussed in paragraphs 3.1 – 3.2, delivery is not expected to reach and exceed the target until year 4. Looking at delivery forecasts for the first three years as well as recent levels of completions, the Council would only be achieving around 70% of its target for the first three years of the plan, meaning that presumption in favour of sustainable development would apply, which could impact the delivery of policies within the newly adopted Local Plan.

## **6 An appropriate stepped target**

- 6.1 The Options set out in the Site Selection Addendum have been tested against the targets set out in the Alternative Approach of 4,560 dwellings or 912 dwellings per annum from adoption. However it is not until year 4 that delivery will reach those rates meaning that the Housing Delivery Test penalties would apply for the first three years.
- 6.2 A stepped target which reflects the rates of delivery from the selected option would be appropriate. Appendices 3 and 4 set out the required stepped target for Options C and D.

## **7 Conclusions**

- 7.1 Whilst under the Liverpool method of calculating housing land supply it would be theoretically possible to meet the five year housing land supply requirement without a stepped target, this would require almost *all* sites which contribute to delivery in the first five years to be selected. It would also rely on substantially high levels of delivery in years 4 and 5 of the plan, which are not considered realistic.



7.2 Given below target delivery levels since 2016/17 as well as the level of delivery expected from commitments completing in the next two to three years, a stepped target is considered reasonable. A stepped target would also give the opportunity for the inclusion of sites with longer lead in times. This would assist with delivery levels in the latter years of the plan period, rather than focussing just on sites which will contribute to a high five year supply requirement.

**Appendix 1 – Local Plan Housing Trajectory Estimated Housing Delivery by Year – All Sites Examined (optimistic estimate of delivery)**

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
WGC	WGC4/4a	SDS1	North east of WGC	Y									50	100	125	125	125	125	125	70						845
WGC	WGC5	SDS2	South east of WGC	Y									50	75	150	150	100	75								600
WGC	Pea02b	SDS3	Broadwater Road West (N)	Y							107	101	128	280	421	143	200	288	200	135						2003
WGC	Pea02c	SDS4	Broadwater Road West (SW) - Pall Mall	N																57	57	57				171
WGC	Han40	MUS1	WGC Town Centre North	N											33	34	33									100
WGC	Pan01b	HS1	Land at Bericot Way (N)	N					21																	21
WGC	WGC1	HS2	Creswick	Y									80	120	100											300
WGC	Pea08	HS3	80 Bridge Road East	N											16	16										32
WGC	Hal03	HS4	Ratcliff Tail Lift Site	Y						38	36	36														110
WGC	Hol19	HS5	Hyde Valley House, Hyde Valley	Y							17															17
WGC	Han91	HS6	Land at Gosling Sports Park	N														50	50							100
WGC	Pea24	HS8	St Michaels House, Holwell Road	N																11	11					22
WGC	Han40a		Town Centre North-Campus East	Y									50	100	100											250
WGC	Pea102		Bio Park, Broadwater Rd	Y								50	150	50												250
WGC	Pea104		YMCA, 90 Peartree Lane	Y							29															29
WGC	Hol23		Neighbourhood Centre, Hollybush Lane	N																				16	16	
Hatfield	Hat1	SDS5	North West Hatfield	Y									50	75	150	150	150	150	150	200	200	175	150	150		1750
Hatfield	HC100b	MUS2	1-9 Town Centre	Y							10	35	26													71
Hatfield	HW100	MUS3	High view (Hilltop) SPD Site	Y							36	36	42	26												140
Hatfield	HE80	HS9	Land at Onslow St Audrey's School	Y							-1	43	44													86

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
Hatfield	HS31	HS10	Garages at Hollyfield	Y								12													12	
Hatfield	Hat11	HS11	Land at Southway	Y										40	40	40										120
Hatfield	HS91	HS13	Land S of Filbert Close	Y								37														37
Hatfield	HE23	HS14	L Kahn Manufacturing, Wellfield Road	N																31	31					62
Hatfield	HC11		Meridian House, The Common	Y									11													11
Hatfield	HE17		Link Drive (Site F)	Y						10	40	30														80
Hatfield	HC08		Lemsford Road (Site H)	N											16	16										32
Hatfield	HSW92		Minster Close	Y						49																49
Hatfield	HSW94		College Lane	Y										55	60											115
Woolmer Gr	WGr1	HS15	Land east of London Road	Y									50	60	40											150
Woolmer Gr	WE100		51-53 London Road	Y								34														34
Woolmer Gr	WGr3		Land west London Road	Y									25													25
O&MH	OMH8	HS16	2 Great North Road	Y										5												5
O&MH	OMH5	HS17	Land rear of 2a-12 Great North Road	Y										20												20
O&MH	GTLAA04	HS32	Four Oaks, Gt North Rd	Y						6																6
O&MH	OMH9		Land to the rear of 19-23 The Avenue	Y										25												25
Welwyn	Wel11	HS18	The Vineyards	Y										30												30
Welwyn	Wel4	HS19	Sandyhurst, The Bypass	Y									30													30
Welwyn	Wel3	HS20	School Lane	Y										9												9
Welwyn	Wel1		Land at Kimpton Road	Y									36	60	64	18										178
Welwyn	Wel2		Land adj Wel Cemetery	Y									10	20	10											40
Welwyn	Wel15		Fulling Mill Lane	Y									8	6												14
Welwyn	Wel6		Land at Kimpton Road	N													16									16
Digswell	Dig1		Land east of New Road	Y									40	40	20											100
Lemsford	StL13		Land at Roebuck Farm	Y										27												27
Stanborough	StL1		North of New Road	Y										30	30	30										90
Stanborough	StL15		East of Great North Road	Y									8													8

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Wel Green	WeG4b	SDS7	Marshmoor	N											40	60									100
Wel Green	GTLAA01	HS35	Foxes Lane, Dixons Hill Rd	Y						12															12
Wel Green	WeG1		51 Welham Manor	Y								16													16
Wel Green	WeG3a		Land South of Wel Manor	Y									34	34											68
Wel Green	WeG10		Dixons Hill Road	Y									60	60											120
Wel Green	WeG12		Land N of Pooleys Lane	Y									20	20	20	23									83
Wel Green	WeG15		Land at Potterells Farm	Y									36	36											72
Wel Green	WeG6		Skipmans Farm	Y									36	37											73
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	Y										14											14
Brookmans Park	BrP4	HS22	Land West of Brookmans Park Station	Y									50	75	100	150	103								478
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	Y									10												10
Brookmans Park	BrP1		Upper Bell Lane	Y									52	52											104
Brookmans Park	BrP12		Land North of Peplins Way	Y									62	63											125
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	Y									17	18											35
Little Heath	BrP7	HS24	Land S of Hawkshead Rd	Y										50	50										100
Little Heath	LHe4/5		Part of Studlands/Videne	Y									31	32											63
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	Y						-1	6														5
Cuffley	Cuf1	HS27	Land at The Meadway	Y										60											60
Cuffley	Cuf6	HS28	Land south of Northaw Road East	Y							5	30	46	40											121
Cuffley	Cuf12	HS29	Land North of Northaw Road East	Y									35	38											73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	Y									35	40											75
Cuffley	Cuf15		King George V Playing Fields	Y									20	30	50	50	26								176
Rural Areas	Hat15	SDS6	Symondshyde New Village	N											100	150	150	150	150	175	175	150	150	150	1500

Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total
<b>Sites Total – All sites examined (as above)</b>	-	-	-	-	21	114	285	460	1,432	1,952	1,735	1,155	903	838	675	679	474	382	300	316	11,721
Small Sites						1			5									8			14
Completions	671	315	462	673	372																2,493
Commitments						481	308					-7	24								806
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	1,668
<b>Total</b>	<b>671</b>	<b>315</b>	<b>462</b>	<b>673</b>	<b>393</b>	<b>596</b>	<b>593</b>	<b>460</b>	<b>1,576</b>	<b>2,091</b>	<b>1,874</b>	<b>1,287</b>	<b>1,066</b>	<b>977</b>	<b>814</b>	<b>818</b>	<b>613</b>	<b>529</b>	<b>439</b>	<b>455</b>	<b>16,702</b>

**Appendix 2 – Local Plan Housing Trajectory Estimated Housing Delivery by Year – All Sites Examined (cautious estimate of delivery)**

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
WGC	WGC4/4a	SDS1	North east of WGC	Y									50	100	125	125	125	125	125	70						845
WGC	WGC5	SDS2	South east of WGC	Y									50	75	150	150	100	75								600
WGC	Pea02b	SDS3	Broadwater Road West (N)	Y							107	101	128	280	421	143	200	288	200	135						2003
WGC	Pea02c	SDS4	Broadwater Road West (SW) - Pall Mall	N																57	57	57				171
WGC	Han40	MUS1	WGC Town Centre North	N											33	34	33									100
WGC	Pan01b	HS1	Land at Bericot Way (N)	N					21																	21
WGC	WGC1	HS2	Creswick	Y									80	120	100											300
WGC	Pea08	HS3	80 Bridge Road East	N											16	16										32
WGC	Hal03	HS4	Ratcliff Tail Lift Site	Y						38	36	36														110
WGC	Hol19	HS5	Hyde Valley House, Hyde Valley	Y							17															17
WGC	Han91	HS6	Land at Gosling Sports Park	N														50	50							100
WGC	Pea24	HS8	St Michaels House, Holwell Road	N																11	11					22
WGC	Han40a		Town Centre North-Campus East	Y									50	100	100											250
WGC	Pea102		Bio Park, Broadwater Rd	Y								50	150	50												250
WGC	Pea104		YMCA, 90 Peartree Lane	Y							29															29
WGC	Hol23		Neighbourhood Centre, Hollybush Lane	N																				16	16	
Hatfield	Hat1	SDS5	North West Hatfield	Y									50	75	150	150	150	150	150	200	200	175	150	150		1750
Hatfield	HC100b	MUS2	1-9 Town Centre	Y							10	35	26													71
Hatfield	HW100	MUS3	High view (Hilltop) SPD Site	Y							36	36	42	26												140
Hatfield	HE80	HS9	Land at Onslow St Audrey's School	Y							-1	43	44													86

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
Hatfield	HS31	HS10	Garages at Hollyfield	Y								12													12	
Hatfield	Hat11	HS11	Land at Southway	Y										40	40	40										120
Hatfield	HS91	HS13	Land S of Filbert Close	Y								37														37
Hatfield	HE23	HS14	L Kahn Manufacturing, Wellfield Road	N																31	31					62
Hatfield	HC11		Meridian House, The Common	Y									11													11
Hatfield	HE17		Link Drive (Site F)	Y						10	40	30														80
Hatfield	HC08		Lemsford Road (Site H)	N											16	16										32
Hatfield	HSW92		Minster Close	Y						49																49
Hatfield	HSW94		College Lane	Y										55	60											115
Woolmer Gr	WGr1	HS15	Land east of London Road	Y									50	60	40											150
Woolmer Gr	WE100		51-53 London Road	Y									34													34
Woolmer Gr	WGr3		Land west London Road	Y									25													25
O&MH	OMH8	HS16	2 Great North Road	Y										5												5
O&MH	OMH5	HS17	Land rear of 2a-12 Great North Road	Y										20												20
O&MH	GTLAA04	HS32	Four Oaks, Gt North Rd	Y						6																6
O&MH	OMH9		Land to the rear of 19-23 The Avenue	Y										25												25
Welwyn	Wel11	HS18	The Vineyards	Y										30												30
Welwyn	Wel4	HS19	Sandyhurst, The Bypass	Y									30													30
Welwyn	Wel3	HS20	School Lane	Y										9												9
Welwyn	Wel1		Land at Kimpton Road	Y											36	60	64	18								178
Welwyn	Wel2		Land adj Wel Cemetery	Y											20	20										40
Welwyn	Wel15		Fulling Mill Lane	Y											8	6										14
Welwyn	Wel6		Land at Kimpton Road	N													16									16
Digswell	Dig1		Land east of New Road	Y									40	40	20											100
Lemsford	StL13		Land at Roebuck Farm	Y										27												27
Stanborough	StL1		North of New Road	Y										30	30	30										90
Stanborough	StL15		East of Great North Road	Y									8													8

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Wel Green	WeG4b	SDS7	Marshmoor	N											40	60									100
Wel Green	GTLAA01	HS35	Foxes Lane, Dixons Hill Rd	Y						12															12
Wel Green	WeG1		51 Welham Manor	Y								16													16
Wel Green	WeG3a		Land South of Wel Manor	Y									34	34											68
Wel Green	WeG10		Dixons Hill Road	Y									60	60											120
Wel Green	WeG12		Land N of Pooleys Lane	Y									20	20	20	23									83
Wel Green	WeG15		Land at Potterells Farm	Y									36	36											72
Wel Green	WeG6		Skipmans Farm	Y									36	37											73
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	Y										14											14
Brookmans Park	BrP4	HS22	Land West of Brookmans Park Station	Y											75	75	75	75	75	103					478
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	Y									10												10
Brookmans Park	BrP1		Upper Bell Lane	Y									52	52											104
Brookmans Park	BrP12		Land North of Peplins Way	Y									62	63											125
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	Y									17	18											35
Little Heath	BrP7	HS24	Land S of Hawkshead Rd	Y										50	50										100
Little Heath	LHe4/5		Part of Studlands/Videne	Y									31	32											63
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	Y						-1	6														5
Cuffley	Cuf1	HS27	Land at The Meadway	Y										60											60
Cuffley	Cuf6	HS28	Land south of Northaw Road East	Y							5	30	46	40											121
Cuffley	Cuf12	HS29	Land North of Northaw Road East	Y									35	38											73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	Y									35	40											75
Cuffley	Cuf15		King George V Playing Fields	Y									20	30	50	50	26								176
Rural Areas	Hat15	SDS6	Symondshyde New Village	N											100	150	150	150	150	175	175	150	150	150	1500



Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total	
<b>Sites Total – All sites examined (as above)</b>	-	-	-	-	21	114	285	460	1,328	1,791	1,700	1,148	939	931	750	782	474	382	300	316	11,721	
Small Sites						1			5									8			14	
Completions	671	315	462	673	372																	2,493
Commitments						481	308					-7	24									806
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	139	1,668
<b>Total</b>	<b>671</b>	<b>315</b>	<b>462</b>	<b>673</b>	<b>393</b>	<b>596</b>	<b>593</b>	<b>460</b>	<b>1472</b>	<b>1930</b>	<b>1839</b>	<b>1280</b>	<b>1102</b>	<b>1070</b>	<b>889</b>	<b>921</b>	<b>613</b>	<b>529</b>	<b>439</b>	<b>455</b>	<b>16,702</b>	

### Appendix 3 – Local Plan Housing Trajectory Estimated Housing Delivery by Year – Option C

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
WGC	WGC4/4a	SDS1	North east of WGC	Y									50	100	125	125	125	125	125	70					845
WGC	WGC5	SDS2	South east of WGC	Y									50	75	150	150	100	75							600
WGC	Pea02b	SDS3	Broadwater Road West (N)	Y							107	101	128	280	421	143	200	288	200	135					2003
WGC	Pea02c	SDS4	Broadwater Road West (SW) - Pall Mall	N																57	57	57			171
WGC	Han40	MUS1	WGC Town Centre North	N											33	34	33								100
WGC	Pan01b	HS1	Land at Bericot Way (N)	N					21																21
WGC	WGC1	HS2	Creswick	Y									80	120	100										300
WGC	Pea08	HS3	80 Bridge Road East	N											16	16									32
WGC	Hal03	HS4	Ratcliff Tail Lift Site	Y						38	36	36													110
WGC	Hol19	HS5	Hyde Valley House, Hyde Valley	Y							17														17
WGC	Han91	HS6	Land at Gosling Sports Park	N														50	50						100
WGC	Pea24	HS8	St Michaels House, Holwell Road	N																11	11				22
WGC	Han40a		Town Centre North-Campus East	Y									50	100	100										250
WGC	Pea102		Bio Park, Broadwater Rd	Y								50	150	50											250
WGC	Pea104		YMCA, 90 Peartree Lane	Y							29														29
WGC	Hol23		Neighbourhood Centre, Hollybush Lane	N																				16	16
Hatfield	Hat1	SDS5	North West Hatfield	Y									50	75	150	150	150	150	150	200	200	175	150	150	1750
Hatfield	HC100b	MUS2	1-9 Town Centre	Y							10	35	26												71
Hatfield	HW100	MUS3	High view (Hilltop) SPD Site	Y							36	36	42	26											140
Hatfield	HE80	HS9	Land at Onslow St Audrey's School	Y							-1	43	44												86

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
Hatfield	HS31	HS10	Garages at Hollyfield	Y								12													12	
Hatfield	Hat11	HS11	Land at Southway	Y										40	40	40										120
Hatfield	HS91	HS13	Land S of Filbert Close	Y								37														37
Hatfield	HE23	HS14	L Kahn Manufacturing, Wellfield Road	N																31	31					62
Hatfield	HC11		Meridian House, The Common	Y									11													11
Hatfield	HE17		Link Drive (Site F)	Y						10	40	30														80
Hatfield	HC08		Lemsford Road (Site H)	N											16	16										32
Hatfield	HSW92		Minster Close	Y						49																49
Hatfield	HSW94		College Lane	Y										55	60											115
Woolmer Gr	WGr1	HS15	Land east of London Road	Y									50	60	40											150
Woolmer Gr	WE100		51-53 London Road	Y								34														34
O&MH	OMH8	HS16	2 Great North Road	Y										5												5
O&MH	OMH5	HS17	Land rear of 2a-12 Great North Road	Y										20												20
O&MH	GTLAA04	HS32	Four Oaks, Gt North Rd	Y						6																6
O&MH	OMH9		Land to the rear of 19-23 The Avenue	Y										25												25
Welwyn	Wel11	HS18	The Vineyards	Y										30												30
Welwyn	Wel4	HS19	Sandyhurst, The Bypass	Y									30													30
Welwyn	Wel3	HS20	School Lane	Y										9												9
Welwyn	Wel1		Land at Kimpton Road	Y											36	60	64	18								178
Welwyn	Wel2		Land adj Wel Cemetery	Y											20	20										40
Welwyn	Wel15		Fulling Mill Lane	Y											8	6										14
Welwyn	Wel6		Land at Kimpton Road	N													16									16
Digswell	Dig1		Land east of New Road	Y									40	40	20											100

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Lemsford	StL13		Land at Roebuck Farm	Y										27											27
Wel Green	WeG4b	SDS7	Marshmoor	N											40	60									100
Wel Green	GTLAA01	HS35	Foxes Lane, Dixons Hill Rd	Y						12															12
Wel Green	WeG1		51 Welham Manor	Y								16													16
Wel Green	WeG3a		Land South of Wel Manor	Y									34	34											68
Wel Green	WeG10		Dixons Hill Road	Y									60	60											120
Wel Green	WeG12		Land N of Pooleys Lane	Y									20	20	20	23									83
Wel Green	WeG15		Land at Potterells Farm	Y									36	36											72
Wel Green	WeG6		Skipmans Farm	Y									36	37											73
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	Y										14											14
Brookmans Park	BrP4	HS22	Land West of Brookmans Park Station	Y											75	75	75	75	75	103					478
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	Y									10												10
Brookmans Park	BrP12		Land North of Peplins Way	Y									62	63											125
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	Y									17	18											35
Little Heath	LHe4/5		Part of Studlands/Videne	Y									31	32											63
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	Y						-1	6														5
Cuffley	Cuf1	HS27	Land at The Meadway	Y										60											60
Cuffley	Cuf6	HS28	Land south of Northaw Road East	Y							5	30	46	40											121
Cuffley	Cuf12	HS29	Land North of Northaw Road East	Y									35	38											73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	Y									35	40											75

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Cuffley	Cuf15		King George V Playing Fields	Y									20	30	50	50	26								176
Rural Areas	Hat15	SDS6	Symondshyde New Village	N																100	100	100	100	100	500

Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total			
<b>Sites Total – Recommended sites (as above)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>114</b>	<b>285</b>	<b>460</b>	<b>1243</b>	<b>1659</b>	<b>1520</b>	<b>968</b>	<b>789</b>	<b>781</b>	<b>600</b>	<b>707</b>	<b>399</b>	<b>332</b>	<b>250</b>	<b>266</b>	<b>10,394</b>			
Small Sites						1			5									8				14		
Completions	671	315	462	673	372																			2,493
Commitments						481	308					-7	24											806
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	139	139	139	1,668
<b>Total Supply</b>	<b>671</b>	<b>315</b>	<b>462</b>	<b>673</b>	<b>393</b>	<b>596</b>	<b>593</b>	<b>460</b>	<b>1387</b>	<b>1798</b>	<b>1659</b>	<b>1100</b>	<b>952</b>	<b>920</b>	<b>739</b>	<b>846</b>	<b>538</b>	<b>479</b>	<b>389</b>	<b>405</b>	<b>15,375</b>			
<b>Stepped Target</b>	610								1,025								629				15,200			

## Appendix 4 – Local Plan Housing Trajectory Estimated Housing Delivery by Year – Option D

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
WGC	WGC4/4a	SDS1	North east of WGC	Y									50	100	125	125	125	125	125	70					845
WGC	WGC5	SDS2	South east of WGC	Y									50	75	150	150	100	75							600
WGC	Pea02b	SDS3	Broadwater Road West (N)	Y							107	101	128	280	200	143	160	160	189	135					1603
WGC	Pea02c	SDS4	Broadwater Road West (SW) - Pall Mall	N																57	57	57			171
WGC	Han40	MUS1	WGC Town Centre North	N											33	34	33								100
WGC	Pan01b	HS1	Land at Bericot Way (N)	N					21																21
WGC	WGC1	HS2	Creswick	Y									80	120	100										300
WGC	Pea08	HS3	80 Bridge Road East	N											16	16									32
WGC	Hal03	HS4	Ratcliff Tail Lift Site	Y						38	36	36													110
WGC	Hol19	HS5	Hyde Valley House, Hyde Valley	Y							17														17
WGC	Han91	HS6	Land at Gosling Sports Park	N														50	50						100
WGC	Pea24	HS8	St Michaels House, Holwell Road	N																11	11				22
WGC	Han40a		Town Centre North-Campus East	Y									50	100	100										250
WGC	Pea102		Bio Park, Broadwater Rd	Y								50	150	50											250
WGC	Pea104		YMCA, 90 Peartree Lane	Y							29														29
WGC	Hol23		Neighbourhood Centre, Hollybush Lane	N																				16	16
Hatfield	Hat1	SDS5	North West Hatfield	Y									50	75	150	150	150	150	150	200	200	175	150	150	1750
Hatfield	HC100b	MUS2	1-9 Town Centre	Y							10	35	26												71
Hatfield	HW100	MUS3	High view (Hilltop) SPD Site	Y							36	36	42	26											140
Hatfield	HE80	HS9	Land at Onslow St Audrey's School	Y							-1	43	44												86

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
Hatfield	HS31	HS10	Garages at Hollyfield	Y								12													12	
Hatfield	Hat11	HS11	Land at Southway	Y										40	40	40										120
Hatfield	HS91	HS13	Land S of Filbert Close	Y								37														37
Hatfield	HE23	HS14	L Kahn Manufacturing, Wellfield Road	N																31	31					62
Hatfield	HC11		Meridian House, The Common	Y									11													11
Hatfield	HE17		Link Drive (Site F)	Y						10	40	30														80
Hatfield	HC08		Lemsford Road (Site H)	N											16	16										32
Hatfield	HSW92		Minster Close	Y						49																49
Hatfield	HSW94		College Lane	Y										55	60											115
Woolmer Gr	WGr1	HS15	Land east of London Road	Y									50	60	40											150
Woolmer Gr	WE100		51-53 London Road	Y								34														34
O&MH	OMH8	HS16	2 Great North Road	Y										5												5
O&MH	OMH5	HS17	Land rear of 2a-12 Great North Road	Y										20												20
O&MH	GTLAA04	HS32	Four Oaks, Gt North Rd	Y						6																6
O&MH	OMH9		Land to the rear of 19-23 The Avenue	Y										25												25
Welwyn	Wel11	HS18	The Vineyards	Y										30												30
Welwyn	Wel4	HS19	Sandyhurst, The Bypass	Y									30													30
Welwyn	Wel3	HS20	School Lane	Y										9												9
Digswell	Dig1		Land east of New Road	Y									40	40												80
Wel Green	WeG4b	SDS7	Marshmoor	N											40	60										100
Wel Green	GTLAA01	HS35	Foxes Lane, Dixons Hill Rd	Y						12																12
Wel Green	WeG1		51 Welham Manor	Y								16														16

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Wel Green	WeG3a		Land South of Wel Manor	Y									34	34											68
Wel Green	WeG10		Dixons Hill Road	Y									60	60											120
Wel Green	WeG12		Land N of Pooleys Lane	Y									20	20											40
Wel Green	WeG6		Skipmans Farm	Y									36	37											73
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	Y										14											14
Brookmans Park	BrP4	HS22	Land West of Brookmans Park Station	Y											75	75	75	75	75	53					428
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	Y									10												10
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	Y									17	18											35
Little Heath	LHe4/5		Part of Studlands/Videne	Y									31	32											63
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	Y						-1	6														5
Cuffley	Cuf1	HS27	Land at The Meadway	Y										60											60
Cuffley	Cuf6	HS28	Land south of Northaw Road East	Y							5	30	46	40											121
Cuffley	Cuf12	HS29	Land North of Northaw Road East	Y									35	38											73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	Y									35	40											75
Rural Areas	Hat15	SDS6	Symondshyde New Village	N											100	150	150	150	150	175	175	150	150	150	1500



						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
<b>Sites Total – Recommended sites (as above)</b>	-	-	-	-	21	114	285	460	1125	1503	1245	959	793	785	739	732	474	382	300	316	10233	
Small Sites						1			5									8			14	
Completions	671	315	462	673	372																2,493	
Commitments						481	308					-7	24								806	
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	139	1,668
<b>Total Supply</b>	<b>671</b>	<b>315</b>	<b>462</b>	<b>673</b>	<b>393</b>	<b>596</b>	<b>593</b>	<b>460</b>	<b>1269</b>	<b>1642</b>	<b>1384</b>	<b>1091</b>	<b>956</b>	<b>924</b>	<b>878</b>	<b>871</b>	<b>613</b>	<b>529</b>	<b>439</b>	<b>455</b>	<b>15,214</b>	
<b>Stepped Target</b>	610							985							685					15,200		

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# Addendum to the Sustainability Appraisal for Welwyn Hatfield Local Plan September 2021

**Final report**

Prepared by LUC

September 2021

**Addendum to the Sustainability Appraisal for  
Welwyn Hatfield Local Plan  
September 2021**

Version	Status	Prepared	Checked	Approved	Date
1.	Draft for Client Comment	K. Kaczor S. Smith	S. Smith H. Kent	H. Kent	11.08.2021
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# Chapter 1

## Introduction

**1.1** A Sustainability Appraisal (SA) Report was prepared by LUC as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Welwyn Hatfield Proposed Submission Local Plan 2016. The version of the SA submitted alongside the Local Plan for Examination is the Welwyn Hatfield Proposed Submission Local Plan 2016 Sustainability Appraisal (August 2016) (Submission document SUB/6). An Errata Sheet (Submission document SUB/7) was published in April 2017 to correct some minor errors in the SA Report.

**1.2** The Proposed Submission Local Plan and accompanying SA Report were subject to consultation from August 2016 until October 2016 and the Local Plan, supporting evidence and consultation responses were submitted for Examination in May 2017.

**1.3** An SA Addendum (examination document EX200) was prepared in February 2020, which included:

- an assessment of additional reasonable alternative site options identified through the 2019 call for sites.
- An assessment of alternative strategic options for growth, identified by the Council.
- A summary of the implications of updates to the evidence base (Green Belt Study, Landscape Sensitivity Assessment and Strategic Flood Risk Assessment (SFRA)) on the existing Local Plan allocated sites and their reasonable alternatives in terms of SA.
- A summary of how the proposed changes to the Local Plan would affect the SA results reported in 2016.

**1.4** This document should be read in conjunction with the previous SA work listed above.

**1.5** Following the Stage 9 Hearings, the Inspector advised that the proposed Local Plan should be updated to provide for at least an additional 3,200 homes to meet the full objectively assessed housing need (FOAHN) of 15,200 homes over the plan period. In addition, one new site option has been identified (Dig1: Land at 2 New Road) and one site option is now considered to be a reasonable alternative (OMH6: Land to the east of Danesbury Park).

**1.6** This document has three main functions:

- To present an assessment of two additional reasonable alternative site options.
- To summarise the implications of the updated FOAHN for site assessments presented in previous iterations of the SA.
- To assess two alternative strategic options for growth identified by the Council to meet the updated FOAHN.

**1.7** A further iteration of the SA will be produced to assess any implications of the Main Modifications to the Proposed Submission Local Plan recommended by the Planning Inspector.

## Chapter 2 Methodology

**2.1** The assessments presented in this document are broadly consistent with the methodology for previous iterations of the SA. As set out in the August 2016 SA Report, each site option was assessed against six SA objectives, each with sub-objectives, which together formed the SA framework.

**2.2** The 2020 SA Addendum updated the assumptions to guide site appraisals slightly to account for updated landscape and Green Belt evidence, as well as an updated housing number (included in Appendix 2 of the 2016 SA Report). The majority of the assumptions remain as presented in the 2020 SA Addendum with the exception of the assumptions for SA objective 5.1 (meeting needs for housing), which have been updated to reflect an updated housing target. These changes have been applied in the assessment of additional sites and all site assessments included in the 2016 SA Report have been revisited with regards to these SA objectives (see **Chapter 4**).

**2.3** The updated SA framework and assumptions for assessing housing allocation options are presented in **Appendix A**, showing deleted text in ~~strike through~~ and additional text underlined. The SA uses colour-coded scores to indicate the performance of each site option against each SA objective. **Figure 2.1** shows how these scores were applied to the appraisals.

Figure 2.1: Key to symbols and colour coding used in the SA of the Local Plan

++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
+/-	Mixed effect likely <sup>1</sup>

<sup>1</sup> There may be a need to distinguish further between mixed effects which will be addressed in the appraisals



?	Likely effect uncertain
N/A	Policy is not relevant to SA objective

# Chapter 3

## Assessment of New Site Options

### Overview

**3.1** This chapter presents the assessment of two additional site options. These are as follows:

- **Dig1:** This site is located at Digswell and could provide between 25 and 130 dwellings. As 130 dwellings is less than 1% of the housing need, the assessment results in relation to criterion 5.1 would not differ if 25 dwellings or 130 dwellings were delivered at this site.
- **OMH6:** This site is located at Oaklands and Mardley Heath and could provide up to 25 dwellings, in conjunction with OMH9. It was previously not considered to be a reasonable alternative due to a lack of access, but an adjacent landowner has agreed access could be provided.

**3.2** **Table 3.1** summarises the likely effects identified for these sites. A summary of the SA findings is presented below, with the full assessment matrices presented in **Appendix B** of this document.

### Summary of SA Findings

#### Dig1

##### SA findings – social objectives (1.1, 1.2, 5.1)

**3.3** **Dig1** is considered to have a minor positive effect on health as the site is within walking distance of community and employment facilities such as schools, employment area and playing fields.

**3.4** The site is expected to have a negligible effect on the amount of housing (SA objective 5.1) as it would contribute less than 1% of the Borough's housing need (this is the case regardless of whether developed for 25 dwellings or 130 dwellings). The site is expected to have a significant positive effect on affordable housing and dwellings for older people.

##### SA findings – environmental SA objectives (2.2, 4.2, 4.3, 4.4, 4.5, 4.8, 4.10)

**3.5** The site is assessed as having a negligible effect on SA objective 2.2 (flood risk) as it is not within Flood Zones 2 or 3.

**3.6** The site is assessed as having a significant positive effect on SA objective 4.2 (reducing greenhouse gas

emissions) and 4.3 (avoid and reduce air pollution), as it is located within 400m of a bus stop with at least a six day a week service. The site is also considered to have a significant positive effect in regard to its distance to an employment site.

**3.7** The site is assessed as having negligible effects on SA objective 4.4 (open space), as none of the site is located within existing open space. The site is expected to have a minor negative uncertain effect on landscape character, as the site has a moderate landscape sensitivity.

**3.8** In relation to the SA objective 4.5 (conserve and enhance Borough's character) the site is expected to have significant negative uncertain effects as it is located adjacent to a Registered Park and Garden and within close proximity to a number of listed buildings.

**3.9** The site is expected to have a minor negative effect in relation to SA objectives 4.6 (biodiversity), 4.8 (avoid water pollution), and 4.10 (productive agricultural land and previously developed land) due to the presence of sensitive features.

#### SA findings – economic SA objectives (6.1, 6.2, 6.3, 6.4, 6.5, 6.6)

**3.10 Dig1** is expected to have negligible effects on SA objective 6.1 (business and employment), 6.3 (vitality of town centres) and 6.5 (mineral resources). Assessments of the SA objectives 6.2 (business and employment) and 6.4 (sustain rural communities) were not carried out for this site as they only relate to provision of employment land. A significant positive uncertain effect is identified for SA objective 6.6 (learning and skills) as the site is within a walking distance of local educational facilities.

#### OMH6

#### SA findings – social objectives (1.1, 1.2, 5.1)

**3.11 OMH6** is considered to have a minor positive effect on health as the site is within walking distance of community facilities.

**3.12** The site is expected to have a negligible effect on the amount of housing as it will contribute to the Borough's overall housing need by less than 1%. The site is expected to have a significant positive effect on affordable housing and dwellings for older people.

#### SA findings – environmental SA objectives (2.2, 4.2, 4.3, 4.4, 4.5, 4.6, 4.8, 4.10)

**3.13** The site is assessed as having a negligible effect on SA objective 4.2 (reducing greenhouse gas emissions) and 4.3 (avoid and reduce air pollution), as it is not located within

400m of a bus stop with a six day a week service and is further than 1400m from the nearest employment site.

**3.14** In relation to SA objective 4.4 (open space), the site is considered to have a negligible effect as none of the site is located within existing open space. The site is expected to have a minor negative uncertain effect on landscape character, as the site has a moderate landscape sensitivity.

**3.15** In relation to the SA objective 4.5 (conserve and enhance Borough's character) the site is expected to have minor negative uncertain effects as it is located within 250m - 1,000m of a Conservation Area and a number of listed buildings. **OMH6** is expected to have significant negative effects in relation to SA objective 4.6 (biodiversity) as it is within 250m of a local wildlife site and a local nature reserve. The site is expected to have a negligible effect in relation to SA objective 4.8 (avoid water pollution).

**3.16** The site is assessed as having a minor negative effect on SA objective 4.10 (promote conservation and sustainable use of agricultural land) as majority of the site is predominantly greenfield land.

#### SA findings – economic SA objectives (6.1, 6.2, 6.3, 6.4, 6.5, 6.6)

**3.17 OMH6** is expected to have negligible effects on SA objective 6.1 (business and employment), 6.3 (vitality of town centres) and 6.5 (mineral resources). Assessments of the SA objectives 6.2 (business and employment) and 6.4 (sustain rural communities) were not carried out for this site as they only relate to provision of employment land. A significant positive uncertain effect is identified for SA objective 6.6 (learning and skills) as it is within a walking distance of local educational facilities.

#### Sites now considered to be unsound

**3.18** Note that some sites assessed in previous iterations of the SA were found to be unsound by the Inspector. As such, those sites are no longer considered to be reasonable alternatives. The sites now considered to be unsound are as follows:

- Pea97: Former Norton Building.
- Pea106: 73-83 Bridge Road East.
- Pea103: 29 Broadwater Road.
- Pea105: 61 Bridge Road.
- StL17: Land at Great North Road.
- BrP34: Brookmans Park Transmitting Station,
- No10/HS31: Land west of St Martin de Porres Catholic Church.

**3.19** The sites listed above that are within Welwyn Garden City (Pea97, Pea106, Pea103 and Pea105) are considered unsound because they are being proposed for housing in a designated employment area. StL17 is considered unsound because it extends into the critical gap between Hatfield and Welwyn Garden City, which has been classified as part of the most essential Green Belt. Site BrP34 is considered unsound because it is not considered a sustainable location, development would cause moderate-high harm to the Green Belt and its delivery is not certain. For site No10/HS31, there are concerns that a viable site may not be deliverable at this location during the plan period.

Figure 3.1: Summary of effects for new site options

	1.1 & 1.2 Health		2.2 flood risk		4.2 greenhouse gas emissions from transport		4.3 air pollution		4.4 open space and landscape character, retaining local distinctiveness				4.5 Character, sense of place and local distinctiveness, historic environment	4.6 Protect and enhance biodiversity and geodiversity	4.8 water pollution	4.10 productive agricultural land and previously developed land	5.1 Housing			6.1 business and employment	6.2 economic investment and regeneration	6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town	6.4 Sustain rural communities and their economies	6.5 mineral resources	6.6 Learning and skills
	Proximity to employment and services/ housing	Proximity to transport	Proximity to employment and services	Proximity to transport	Open Space	Landscape character	Previously Developed Land	local distinctiveness						Amount of housing	Affordable housing	Dwellings for older people									
<b>Digswell</b>																									
Dig1	+	0	++	++	++	++	0	-?	0	0	--?	-?	-?	-	0	++	++	0	N/A	0	N/A	0	0	++?	
<b>Oaklands and Mardley Heath</b>																									
OMH6	+	0	0	0	0	0	0	-?	0	0	-?	--?	0	-	0	++	++	0	N/A	0	N/A	0	0	++?	

## Chapter 4

# Appraisal of Previously Assessed Sites

### Overview

**4.1** This chapter summarises the implications of updates to the housing need for the Borough, which affects the assumptions for SA objective 5.1 (amount of housing). LUC reviewed the latest site assessments, presented in the 2020 SA Addendum, to determine whether the change to the housing need, and resulting change in the assumptions for SA objective 5.1, results in any changes to the SA conclusions. For site WGC4a only, the latest assessment is not that presented in the 2020 SA Addendum, but an update to this which was prepared in November 2020, to account for an updated housing number. The latest assessment of WGC4a is that presented in examination document EX219G<sup>2</sup>.

**4.2** For the majority of sites, the changes to SA objective 5.1 resulting from the updated housing need do not result in a change to the effect recorded, as they still fall within the same percentage range with regards to the percentage of the overall housing need they will meet.

**4.3** The exception to this is site SB1, Land South of Swanley Bar Lane. This site was previously assessed as having negligible effects with regards to amount of housing (SA objective 5.1). This is now updated to minor positive effects as, given the change to the FOAHN, the site will now provide between 1 and 5% of the Borough's overall housing need. Table 4.1: presents an updated summary of SA findings for site SB1.

**4.4** In addition, the capacity of site OMH9 has increased from 12 to 25 dwellings, however this change does not influence the assessment of negligible effects (0) for SA objective 5.1 (amount of housing) previously recorded, as the site would still provide less than 1% of the Borough's total housing need.

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<sup>2</sup> <https://www.welhat.gov.uk/media/17713/EX219G-Updated-appraisal-for-WGC4a-revised-housing-number-Nov-11->

[2020/pdf/EX219G\\_Updated\\_appraisal\\_for\\_WGC4a\\_revised\\_housing\\_number\\_Nov\\_11\\_2020.pdf?m=637455669100030000](https://www.welhat.gov.uk/media/17713/EX219G-Updated-appraisal-for-WGC4a-revised-housing-number-Nov-11-2020.pdf?m=637455669100030000)

Table 4.1: Summary of effects for SB1: Land South of Swanley Bar Lane

Swanley Bar																							
SB1	+	0	++	++	++	++	0	-?	0	-	--?	--?	0	-	+	++	++	0	N/A	0	N/A	0	++?
	1.1 & 1.2 Health	2.2 flood risk	4.2 greenhouse gas emissions from transport	4.3 air pollution	4.4 open space and landscape character, retaining local distinctiveness	4.5 Character, sense of place and local distinctiveness, historic environment	4.6 Protect and enhance biodiversity and geodiversity	4.8 water pollution	4.10 productive agricultural land and previously developed land	5.1 Housing	6.1 business and employment	6.2 economic investment and regeneration	6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town	6.4 Sustain rural communities and their economies	6.5 mineral resources	6.6 Learning and skills							
	Proximity to employment and services/ housing	Proximity to transport	Proximity to employment and services	Proximity to transport	Open Space	Landscape character	Previously Developed Land	local distinctiveness	Amount of housing	Affordable housing	Dwellings for older people												

# Chapter 5

## Assessment of Alternative Strategic Options for Growth

### Overview

**5.1** This chapter presents the assessment of alternative strategic options for growth identified by the Council. Policies SP2 and SP3 will be updated in light of the proposed approach once this is finalised.

**5.2** The Council must decide how to distribute the additional growth required as a result of the updated FOAHN of 15,200. The housing targets throughout the plan period are shown in **Table 5.1:** below<sup>3</sup>. These have a bearing on the choice of strategic housing distribution. There are different approaches to the calculation of a five year land supply. The one more usually used on appeal is known as the Sedgefield approach and is a tougher requirement to meet as it requires making up for any shortfall in the first five years following adoption. The second approach is known as the Liverpool approach and allows for any shortfall to be met by the end of the plan period. In East Herts the Planning Inspector adopted a third approach (referred to in this document as the 'alternative method'), which requires the shortfall to be met by the end of the first ten years. **Table 5.1:** includes three different targets, based on these three methods.

**5.3** Whilst the FOAHN is 15,200, part of this figure includes existing commitments and completions, as well as an allowance for windfall sites. Taking this into account, the Council needs to identify land for 10,233 dwellings. Some 8,578 of these can be provided for at allocations already put forward by the Council in 2016 and 2019 that the Inspector has found sound, or could be found sound subject to Main Modifications As such, the Council must decide where to allocate the outstanding 1,655 dwellings.

### Developing Strategic Growth Options

**5.4** Five strategic growth options were assessed in the 2020 SA Addendum. These were based on an FOAHN of 16,000, although not all options included enough housing to meet that OAN.

**5.5** Given the change to the FOAHN and Inspector's conclusions from hearings sessions, the Council has started afresh with regards to considering strategic growth options. The five options presented in the previous SA Addendum are

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<sup>3</sup> Tables 5.1, 5.2 and 5.3 included within Report of Corporate Director (Public Protection, Planning and Governance) to Cabinet Housing &

Parking Panel 14<sup>th</sup> October 2021: Local Plan – Additional Sites and Modifications to the Plan



no longer considered to be reasonable alternatives because the Inspector asked for a more nuanced approach with regards to site selection, with a finer grained approach to locational accessibility. The Inspector supports a strategy based on generally proportionate distribution and emphasised the importance of meeting local need, either in the settlements themselves or the wider parish.

**5.6** The Council identified two initial growth options:

- A.** Natural/proportional growth in the villages, with Symondshyde (15,365 homes in total).
- B.** Additional (maximum) growth in the villages, without Symondshyde (15,204 homes in total).

**5.7** However, neither of these options were considered reasonable. This is because, whilst both options would meet the FOAHN of 15,200, Option A (proportional village growth) would result in a poor five year housing land supply in the short term, because of the lag time in establishing a new community at Symondshyde. However, Option B (additional village growth) would result in a poor housing land supply in the last five years of the plan period.

**5.8** As such, the Council amended these two options to resolve these issues, resulting in options C and D:

- C.** Variation of B: additional (maximum) growth in the villages plus 500 homes at Symondshyde within the plan period. This option would provide for 15,345 dwellings in the plan period overall.

- D.** Variation of A: natural/proportional growth in the villages, with Symondshyde, but with additional growth in last five years. This option would provide for 15,606 dwellings in the plan period overall.

**5.9** Both options include growth at Symondshyde (Hat15) but for Option D the site would be fully built out within the plan period, whereas for Option C only 500 homes would be provided at Symondshyde within the plan period, with the remainder coming forward beyond the plan period. The additional village growth included in Option C would be located primarily at Brookmans Park, Welwyn and Welham Green, as well as at Cuffley, with a small amount of additional growth at Lemsford and Digswell. Of these villages, Brookmans Park, Cuffley, Welham Green and Digswell are served by a railway station. **Table 5.2:** and **Table 5.3:** show how the options are distributed by settlement and by settlement hierarchy respectively.

**5.10** All options fall short of the required delivery of homes in the final five years of the plan period, as a result of fewer large, strategic sites, but the Council's ability to address this is limited by the number of suitable large, strategic sites available for allocation. The Council considers Options C and D to be as close to the housing requirement across the plan period as possible. Options C and D have therefore been subject to SA. Note that these growth options focus on the distribution of housing growth, therefore the assessment does not consider those objectives that relate solely to employment growth (SA objectives 6.2 and 6.4).

**Table 5.1: Housing targets and likely delivery across the plan period**

Timing of housing delivery	0-5 years	6-10 years	11-15 years	Total	Total plus completions (2,514 dwellings)
Requirement "Liverpool Method"	4,989	4,608	3,089	12,686	15,200
Requirement "Sedgefield Method"	5,846	3,800	3,040	12,686	15,200
Requirement "Alternative method"	4,560	5,086	3,040	12,686	15,200
Option A	4,464	5,541	2,846	12,851	15,365
Option B	5,040	5,501	2,149	12,690	15,204
Option C	4,773	5,409	2,649	12,831	15,345
Option D	4,598	5,596	2,899	13,093	15,606

Table 5.2: Options Analysis by Settlement

	Option A	Option B	Option C	Option D	Local need target	Notes
WGC	6,525	6,525	6,525	6,525	1,464 - 6,797	
Hatfield	3,596	3,596	3,596	3,596	995 – 4,621	
Woolmer Green	227	286	261	261	43 - 201	
O&MH	86	86	86	86	89 - 413	
Welwyn	254	502	502	254	112 - 490	
Digswell	104	140	124	104	47 - 206	
Lemsford	0	27	27	0	7 - 30	
Stanborough	19	117	19	19	9 - 41	
Welham Green	368	556	556	441	96 – 419	
Brookmans Park & Bell Bar	421	828	724	549	109 - 506	
Little Heath	104	204	104	104	34 -158	
Cuffley	409	585	585	409	132 - 575	
Symondshyde	1500	0	500*	1500	n/a	*1000 dwellings to be delivered post 2036
Rural Areas	84	84	84	84	137 -588	

Table 5.3: Options Analysis by Settlement Hierarchy

	Option A	Option B	Option C	Option D	OAN target
Tier 1 and 2 Towns (WCG & Hatfield)	10,121	10,121	10,121	10,121	11,418
Tier 3 large villages	1,452	2,471	2,367	1,653	1,990
Villages with Stations	1,302	2,109	1,989	1,503	1,706
Tier 4 villages	521	743	575	555	978
New Tier 4 village - Symondshyde	1,500	0	500	1,500	n/a

	Option A	Option B	Option C	Option D	OAN target
Welwyn Parish	444	728	712	444	Local need target 244 – 1,109

## SA Findings for Strategic Growth Options

**5.11** The full SA findings are presented in **Table 5.4:** and summarised below. The appraisal of strategic growth options is necessarily high level. Therefore, the following assessments are somewhat comparative to each other, in order to draw out differences between them.

**5.12** Given the need to provide housing later in the plan period, both options include Symondshyde. The difference between them is the timing of when this comes forward (Option D assumes the whole allocation of 1,500 homes will come forward in the plan period, Option C assumes 500 homes will come forward). As such, both will result in overall similar patterns of development, with more village growth under Option C.

**5.13** Both options are expected to have positive effects for SA objective 1.1 (health) and 6.6 (learning and skills), because they would lead to provision of affordable housing and development within proximity of community services and facilities. For Option D the positive effect is likely to be significant, as new services and facilities would be provided at Symondshyde within the plan period. Option C may put greater pressure on services and facilities in the villages.

**5.14** Planning for growth on this scale is likely to lead to significant negative effects in relation to SA objectives which seek to reduce impacts on the environment, and protect natural and historic assets for all options. Potential significant negative effects are expected in relation to greenhouse gas emissions from built development and transport and there is potential for negative effects from air pollution from traffic from all options (SA objectives 4.1, 4.2, 4.3). Both options would result in significant negative effects in relation to water consumption (SA objective 4.7), with both options likely to have minor negative effects on water pollution (SA objective 4.8) and in relation to flood risk (SA objective 2.2) and agricultural land (SA objective 4.10). Mitigation, which is expected to reduce negative effects, will include other Proposed Submission Local Plan policies (e.g. SP10: Sustainable Design and Construction, SP4: Transport and Travel and SADM3: Sustainable Travel for all), the location of proposed development which seeks to encourage sustainable travel, and technological improvements which are expected to reduce air pollution from traffic.

**5.15** Both options are expected to have mixed minor positive and significant negative effects for SA objective 4.4 (open

space), although it is noted that the effects for Option C are expected to be greater than Option D. Due to a greater level of growth at existing villages, Option C is more likely to put greater pressure on existing open space in these areas and the additional growth at villages has potential to substantially alter their character and the settlement pattern of the Borough. However, both options include growth at Symondshyde, which will introduce a substantial amount of growth to a rural location.

**5.16** Both options would result in mixed positive and negative effects in relation to the historic environment (SA objective 4.5), as development may be able to be sensitively designed but could also adversely affect heritage assets and their settings. For Option C, the negative effect is likely to be significant, as the greater amount of growth around villages has greater potential to affect the historic character of these areas.

**5.17** Mixed minor positive and significant positive effects are expected for both options with regards to biodiversity and geodiversity (SA objective 4.6) as both have potential for biodiversity gain but also could adversely affect sensitive features and lead to habitat loss.

**5.18** Both options would have significant positive effects with regards to housing (SA objective 5.1), as both would provide slightly over the FOAHN. Under Option C, development at Symondshyde would not be completed until after the end of the plan period, therefore it provides for some growth later on as well. However, it is assumed that under both options, an appropriate level of growth would also come forward after the plan period, and this would be guided by an updated Local Plan.

**5.19** Both options are likely to have positive effects for SA objectives 6.3 (vitality of town centres) and 6.4 (vitality of rural communities) as both focus development in and around towns and villages. For SA objective 6.4, Option C is likely to have greater positive effects, given that it will result in greater levels of growth at villages.

## Reasons for Selection of Preferred Option

**5.20** The Council's key reasons for selecting Option D as a preferred option are that:

- Option D seeks to provide greater protection of heritage and environmental assets by minimising levels of growth in some settlements. It therefore better meets the

strategy set out in the Local Plan as well as providing for the strategy set out in the draft submitted plan for the provision of Gypsy and Traveller sites to remain largely unaltered.

- The Council considers that, on balance, Option D provides a distribution more closely aligned to the vision and objectives and spatial strategy set out in the submitted plan.

Table 5.4: Assessment of Strategic Options for Growth

SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
<b>Long-term Objective 1: Health Improvement</b>				
1.1: Lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health?	+/-	++/-	<p>All options are likely to have positive effects in relation to reducing health inequalities through the increased provision of housing, including affordable housing and dwellings for older people, green infrastructure and supporting infrastructure, regenerating urban areas, and providing close to the population growth requirement for employment land provision, providing jobs and training opportunities. The majority, if not all, development under both options is expected to be located where residents can access services and facilities, such as education, health and recreation facilities. However, Option C may put more pressure on existing facilities in villages, which may not be able to accommodate the level of growth proposed. In addition, growth at Symondshyde is expected to provide new services and facilities to meet the needs of new residents, contributing to positive effects for Option D. Whilst Symondshyde would still come forward under Option C, it would only be partly developed within the plan period, therefore these new services and facilities would likely not be available within the plan period.</p> <p>Both options would result in loss of greenfield land which could have an adverse effect on people's physical and mental wellbeing unless sufficient access is retained and/or offset by accessible green infrastructure close to residential areas.</p>	<p><b>SP 1: Sustainable Development</b> promotes the increased supply of housing and contributes to the reduction of social and health inequalities.</p> <p><b>Policies SP11: Protection and Enhancement of Critical Environmental Assets</b> and <b>SP13: Infrastructure Delivery</b> will reduce the potential for inadequate infrastructure provision to support new development.</p>
1.2: Lead to improved health for all?			The strategic options are not considered likely to affect those criteria which are shown greyed out.	
<b>Long term Objective 2: Safer Communities</b>				
2.1 Reduce opportunities for crime and anti-social				

SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
behaviour, and reduce fear of crime?				
2.2: Ensure there is no increase in flood risk to people or property, taking into account climate change?	-?	-?	<p>Both options are likely to lead to increased risk due to greater runoff from increased impermeable surfaces, particularly where development takes place on greenfield land. All effects are uncertain, as it is currently unknown what mitigation measures would be implemented as part of individual development proposals, the extent of green infrastructure provision within the proposals to attenuate surface water run off or the exact design of proposals.</p> <p>[Assumption: The proposed quantities of development could be accommodated within the borough without the need to develop in higher flood risk areas, taking into account climate change. Flood risk associated with particular strategic development locations is assessed under the SA of the Settlement Strategy.]</p>	<p><b>SP10: Sustainable Design and Construction</b> – requires sustainable urban drainage to reduce flood risk; <b>SP11: Critical Environmental Assets</b> requires development to avoid Flood Zones 2 and 3.</p>
<b>Long-term Objective 3: Good Citizenship</b>				
3.1: Encourage involvement of the public in the planning process				
<b>Long-term Objective 4: Improving the Environment</b>				
4.1: Significantly reduce greenhouse gas emissions from built development?	--	--	<p>By delivering a significant amount of built development, both options will result in significantly greater energy use within the borough. To the extent that this energy comes from non-renewable sources, it will therefore result in increased greenhouse gas emissions.</p>	<p><b>SP10: Sustainable Design and Construction</b> – requires development to maximise energy efficiency and incorporate renewable and/or low carbon technologies, in</p>

SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
				accordance with the energy hierarchy.
4.2: Significantly reduce greenhouse gas emissions from transport?	--	--	Concentrating development in and around towns and villages should minimise travel distances to jobs and services and encourage people to walk, cycle or use public transport, reducing the otherwise likely negative effects. Greater housing levels will also lead to greater traffic generation during construction which would have adverse implications for GHG emissions from transport. Whilst Option C would result in more development allocations that are generally further from existing employment opportunities, Symondshyde is not currently well served by public transport. Development at Symondshyde is likely to attract a bus service in the long term, but it is unknown if and when this would come forward, as this would require joint working with bus operators.	<b>SP1: Delivering Sustainable Development &amp; SP3: Settlement Strategy and Green Belt Boundaries</b> – Development will be directed to those areas with good transport networks and well served with jobs, services and facilities.
4.3: Avoid and reduce air pollution	--	--	By delivering a significant amount of built development, all Options are likely to result in significant increases in road and rail travel, with road transport in particular producing potential increased emissions to air of pollutants such as NOx and particulates. See also objective 4.2 above.	As per objective 4.2.
4.4: Protect and enhance open space and landscape character, retaining local distinctiveness?	+/--?	+/--?	<p>The development of higher levels of housing has the potential to lead to greater opportunities for enhancing open space provision across the council area. However, this could lead to increased pressure being placed on existing green infrastructure in and surrounding towns and villages. Whilst this would be applicable to both options, Option C has potential to result in more pressure on existing open space due to the higher level of growth in villages, whereas development at Symondshyde in Option D is expected to provide new open space within the plan period.</p> <p>Both options are likely to have minor positive effects on retaining local distinctiveness by avoiding settlement coalescence on the assumption that all options would be delivered in and around town and villages (except for development at Symondshyde), however effects would be dependent individual proposals.</p>	<p><b>SP9: Place making and high quality design -</b> Proposals should relate well to their surroundings, local distinctiveness, wider townscape and landscape.</p> <p><b>SP12: Strategic Green Infrastructure and SP13: Infrastructure Delivery</b> – requirement for additional green infrastructure and provision of open space would</p>

SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
			Both options would result in the loss of significant areas of greenfield land which could have significant negative effects due to the loss of previously undeveloped land, detracting from the existing settlement pattern and the qualities of more sensitive landscapes. Due to maximising growth around villages, Option C may lead to development less in keeping with the existing development pattern. Growth at Symondshyde under both options will result in substantial urbanisation of this rural location.	help to reduce negative effects.
4.5: Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?	+?/--?	+?/--?	Development in or surrounding towns and villages has potential to conserve and enhance local character and distinctiveness, but larger developments will require significant investment in masterplanning to achieve this. Higher levels of development may put pressure on particularly sensitive heritage assets within towns and villages leading to adverse effects on their settings. Higher levels of development could also lead to settlements losing their distinct character and becoming much larger settlements or urban extensions. This would be particularly relevant to Option C due to higher housing levels and/or higher potential loss of greenfield land in villages. All effects are uncertain and would depend on the exact locations and design of individual development proposals.	<b>SP1: Delivering Sustainable Development-</b> heritage assets should be protected and enhanced.
4.6: Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?	+?/--?	+?/--?	The development of relatively high levels of housing and the loss of greenfield land has the potential to lead to adverse impacts on biodiversity. However, the development of housing also has the potential for increased opportunities for biodiversity enhancement through the provision of biodiversity net gain, green infrastructure and open space. All effects would be uncertain and dependent on the exact location of individual sites in relation to sensitive biodiversity areas, whether brownfield land would be used and design and mitigation employed.	<b>SP 10: Sustainable design and construction-</b> Existing habitat should be incorporated into the design with sound ecological principles.



SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
				<b>SP 11: Protection and enhancement of critical environmental assets</b>
4.7: Reduce water consumption, and provide for reliable sources of water supply even in drought conditions	--	--	Both options will result in significantly increased water consumption by both residential and employment uses.	<b>SP10: Sustainable design and construction</b> – water sensitive design principles will address water supply, consumption and quality.  <b>SP11: Protection and enhancement of critical Assets</b>
4.8 Avoid water pollution	-?	-?	Impacts on water quality should be largely avoidable, by provision of adequate infrastructure alongside new development in the form of SUDS and necessary upgrades to sewage infrastructure (e.g. Maple Lodge WwTW and at Rye Meads WwTW and their networks), and good practice during construction. However, the risks of contamination are increased with a greater volume of development (Option 4). SUDS is not always technically feasible and major sewage infrastructure upgrades can take a number of years and could impact on the timing of housing delivery.	<b>SP 10: Sustainable design and construction</b> -water sensitive design principles should be integrated into development proposals to sustainably address water quality.
4.9: Minimise the amount of waste generated and maximise the re-use, recycling or				

SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
composting of waste that cannot be reduced.				
4.10: Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land	-	-	Concentrating development in and around towns and villages (both options) would help to maximise the opportunities to re-use previously developed land and alleviate pressures on prime agricultural land. However, the planned scale of development means that a significant proportion of it will have to take place on greenfield land. Both options largely avoid best and most versatile agricultural land, with the exception of site Hat1.	<b>Policy SP 11: Protection and enhancement of critical environmental assets-</b> protect the best and most versatile agricultural land.
<b>Long-term Objective 5: Decent Housing</b>				
5.1: Provide the right amount, type and tenure of housing to meet identified local needs?	++	++	Both options will deliver a significant amount of additional housing across the plan period 2016-2036 and will meet the FOAHN. The housing requirement is for at least 15,200 new homes over this period, so Option C would provide 145 more homes than this target and Option D would deliver 406 homes more than this target. It is assumed that both options would provide a proportionate contribution of affordable homes and homes for older people.  It is also noted that both options would respond to local housing needs, as WHBC used natural growth data to inform the level of growth at villages. Both options would meet local needs and Option C would exceed this.	Not required but <b>Policy SP1: Delivering Sustainable Development</b> requires new development to contribute to the creation of mixed and sustainable communities.
<b>Long-term Objective 6: A Thriving Economy</b>				
6.1 ensure the supply, location				

SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy?				
6.2: Encourage economic investment in those areas most in need of regeneration, in a way that will benefit those most in need of rewarding employment.				
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	++	++	The large scale of housing and employment growth in and around the main towns has the potential to have significant positive effects on Welwyn Garden City and Hatfield town centres by delivering new customers within their catchments and supporting a revitalised retail offering, alongside complimentary town centre uses including housing and employment.	Not required, but <b>Policy SP1: Delivering Sustainable Development</b> requires growth to be undertaken in a way which supports economic growth.

SA Objective	Likely Effects		Commentary	Mitigation recommendations (focussing on significant adverse effects)
	Option C: additional village growth	Option D: proportional village growth		
6.4: Sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character.	++/?	+/?	Providing for more homes in and around villages is expected to have a positive effect in sustaining rural communities. This will be greater for Option C due to the greater level of growth around villages. Uncertainty relates to the protection of rural character which will depend on the exact location and design of development.	Not required, but <b>Policy SP1: Delivering Sustainable Development</b> requires growth to be undertaken in a way which supports economic growth.
6.5 Avoid sterilisation of mineral resources	0	0	None of the site allocations would result in sterilisation of mineral resources earmarked for extraction or safeguarding.	Not required.
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	+	++	Development focused in or surrounding towns and villages (both options) would help to ensure existing and new residents have good access to a range of services and facilities, including education. Option C has potential to put more pressure on existing facilities due to the greater level of growth at villages, whereas Option D is expected to provide new services and facilities, to some extent, during the plan period in order to serve new development at Symondshyde.	Not required, but <b>Policy SP1: Delivering Sustainable Development</b> requires growth to be undertaken in a way which supports economic growth.

# Chapter 6

## Summary and Conclusions

### Overview

**6.1** This document presents an Addendum to the Sustainability Appraisal of the Proposed Submission Local Plan (2016), Errata Sheet and 2020 Addendum, following the requirement for the Council to re-consider the overall housing need for Welwyn Hatfield and to consider two additional reasonable alternative sites. It includes an assessment of those additional reasonable alternative sites (Dig1 and OMH6), re-assessment of site options previously considered based on a change to SA objective 5.1 (housing) and an assessment of two strategic growth options.

### Additional Sites

**6.2** The additional site options are both expected to have positive with regards to social objectives, particularly health and housing. Dig1 performs well with regards to access to employment, services and public transport, whereas OMH6 has negligible effects for these objectives, as it is not located so close to public transport links, employment and services. Both options are expected to have generally negative effects with regards to environmental objectives, although these are generally minor, except for significant negative effects in relation to GHG emissions, air pollution and water consumption. Both options are likely to have generally negligible effects with regards to economic objectives, with the exception of learning and skills, for which positive effects are expected.

### Reassessment of Previously Assessed sites

**6.3** The change in the FOAHN only results in a change in SA conclusions for one site: SB1, Land South of Swanley Bar Lane. This site was previously assessed as having negligible effects with regards to the amount of housing to be delivered (SA objective 5.1), but this has now changed to a minor positive effect, as the site will now provide between 1 and 5% of the FOAHN.

### Strategic Growth Options

**6.4** The Strategic Growth Options perform similarly as they will result in growth in many of the same areas. Both perform well with regards to provision of housing and contributing to the vitality and viability of Welwyn Hatfield's towns and villages

(although Option C is expected to contribute to the vitality and viability of villages more than Option D) and both perform less well with regards to environmental objectives. Nevertheless, both may present opportunities for environmental enhancement. **Overall, Option D performs slightly better than Option C.** This is because Option C may put more pressure on services and facilities in the villages, due to the greater amount of growth there, whereas Option D is likely to provide new services and facilities at Symondshyde during the plan period, and put less pressure on services and facilities in villages. It is noted that other policies, particularly SP 13: Infrastructure Delivery, are likely to mitigate potential adverse effects on existing services and facilities, providing supporting infrastructure is provided in good time. In addition, Option C presents a higher risk of settlements losing their distinct character and becoming much larger settlements or urban extensions.

## Cumulative Effects

**6.5** The Local Plan (as proposed to be amended) allocates around 3,600 additional new homes when compared with the Proposed Submission Local Plan (2016). This increases the total housing provision from around 12,000 to 15,606 homes over the plan period. Whilst the scale of change will be greater with the additional allocated development, due to the large scale of development already set out in the Proposed Submission Local Plan, the cumulative effects identified in the 2016 SA are generally considered to remain valid. Whilst the 2020 SA Addendum amended the cumulative effects on SA objective 5.1 (housing) to a minor positive effect, this is now considered to be a **significant positive effect** as the plan will provide for the full FOAHN.

LUC

September 2021

**Appendix A**  
**Updated SA Framework and Assumptions**

## Housing

### Welwyn Hatfield Options for Site Allocations SA: Assumptions for Housing Sites

SA Question: Will the policy...	Assumptions for SA of Housing Sites
<b>Long-term Objective 1: Health Improvement</b>	
<p>...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)</p>	<p>Sites that are within straight line walking distance (720 m)<sup>4</sup> of three or more different types of the following service/facility/asset:</p> <ul style="list-style-type: none"> <li>• GP surgery;</li> <li>• food/convenience store;</li> <li>• post office;</li> <li>• pharmacy;</li> <li>• future neighbourhood centre within strategic allocations if required by policy<sup>5</sup>.</li> </ul> <p>...and/or within 1,400 m<sup>6</sup> of two or more of the following types of service/facility/asset:</p> <ul style="list-style-type: none"> <li>• sports/recreation facility or an area of open space;</li> <li>• hospital;</li> <li>• education establishment (including nurseries, primary school, secondary school and colleges)<sup>7</sup>;</li> </ul>

<sup>4</sup> Adapted from target distances in Welwyn Hatfield Community Facilities Study, October 2012

<sup>5</sup> assuming the neighbourhood centre is in the centre of the broad location

<sup>6</sup> For the purpose of the appraisal, walking distance will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (depending on the house location within a larger site and the availability of a direct route). It is considered that a straight line walking distance of 720m typically equates to a walking distance of 1200m or 15 minutes' walk, and a straight line walking distance of 1400m typically equates to a walking distance of 2400m or 30 minutes' walk.

<sup>7</sup> The University of Hertfordshire has not been included as it is assumed that sites are not being developed for student housing.



SA Question: Will the policy...	Assumptions for SA of Housing Sites
...lead to improved health for all? (1.2)	<ul style="list-style-type: none"> <li>• Employment Site or Town Centre.</li> </ul> <p>...are assumed to have a minor positive (+) effect on this aspect of the SA objective because of the potential to use these facilities. Allocations which are also located in an area within one of the 20% most deprived areas within the District (<del>'access to services' domain of English Indices of Deprivation</del>) are assessed as having a significant positive (++) effect on this aspect of the objective.</p> <p>Other allocations are assessed as having a negligible (0) effect.</p> <p>(Sources required: GIS mapping of GP surgeries, hospitals, sports/recreation facilities, open spaces, post offices, local shopping centres, primary schools, secondary schools, Employment Sites, Town Centres, Convenience Stores, English Indices of Deprivation)</p>
<b>Long-term Objective 2: Safer Communities</b>	
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	<p>The effects of new development on safety, crime and fear of crime will depend on design proposals for the allocated sites and factors such as the inclusion of open spaces that are overlooked by buildings to improve safety and security and sufficient lighting. Generally, these issues will not be influenced by the location of development and will instead be determined through the detailed proposals for each site. This SA objective does not, therefore, form part of the SA of options for Site Allocations.</p> <p>(Sources required: none)</p>
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	<p>Development on sites that are within areas of high fluvial flood risk may have negative effects on this SA objective:</p> <ul style="list-style-type: none"> <li>• Sites having a significant proportion of land (&gt;=25%) within flood zones 3a or 3b, have an 'extreme' flood hazard rating in the SFRA, and/or include flood storage areas are assumed to have a significant negative (--)effect.</li> <li>• Sites having as significant proportion of land (&gt;=25%) within flood zone 2 or that are 5-25% within flood zone 3 are assumed to have a minor negative (-) effect. Sites that include a very small part of a flood storage area would also have a minor negative effect.</li> <li>• Sites with less than 5% of their land within flood zone 3, less than 25% of their land within flood zone 2 and do not include flood storage areas are assumed to have a negligible (0) effect.</li> </ul> <p>The opportunity to incorporate SuDS to mitigate the risks of surface water flooding and surface water contamination is a design issue and does not form part of the SA of options for Site Allocations.</p> <p>(Sources required: EA flood zones; SFRA; flood storage areas)</p>
<b>Long-term objective 3: Good Citizenship</b>	

SA Question: Will the policy...	Assumptions for SA of Housing Sites
...encourage involvement of the public in the planning process? (3.1)	Not applicable to appraisal of options for site allocations.
<b>Long-term objective 4: Improving the environment</b>	
...significantly reduce greenhouse gas emissions from built development? (4.1)	<p>While any additional development is likely to increase <u>total</u> energy consumption in the District, it is likely to be built to a higher energy efficiency standard than existing housing stock as a result of increasingly stringent Building Regulations requirements and the Government's 2016 zero carbon target for new dwellings, thereby helping to improve energy efficiency. It may also offer opportunities for incorporating local renewable energy generation.</p> <p>However, these issues will not be determined by the location of the development and will, instead, be determined through the detailed proposals for each site. Therefore, this aspect of the SA objective is not assessed in the SA of the options for Site Allocations.</p>
...significantly reduce greenhouse gas emissions from transport? (4.2)	<p>In terms of location, greenhouse gas emissions are most closely linked to emissions from vehicles. Vehicles are more likely to be used as distances to destinations increase or travel by alternative more sustainable modes become less attractive. As an indication of effects on this aspect of the SA objective, the following is assumed:</p> <p><b>Proximity to employment and services:</b></p> <ul style="list-style-type: none"> <li>• Where an allocation is within straight line walking distance (1,400 m) of an Employment Site or Town Centre there is a significant positive (++) effect on this aspect of the SA objective due to minimising travel distances and car use related greenhouse gas emissions, and enabling easier access to employment opportunities.</li> <li>• Where an allocation is within 720 m of a food/convenience store, and/or a future neighbourhood centre within a strategic allocation if required by policy <sup>8</sup> a minor positive (+) effect is assumed.</li> <li>• Where a site is within walking distance of a site or centre but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0).</li> </ul> <p><b>Proximity to transport services:</b></p> <ul style="list-style-type: none"> <li>• Sites within walking distance of a rail station (1,400 m) or bus stop on a route providing a six day a week service (400 m) are assumed to have a significant positive (++) effect on this aspect of the SA objective.</li> </ul>

<sup>8</sup> assuming the neighbourhood centre is in the centre of the broad location

SA Question: Will the policy...	Assumptions for SA of Housing Sites
	<ul style="list-style-type: none"> <li>Other housing sites will be assessed as having a negligible (0) effect on this aspect.</li> </ul> <p>(Sources required: GIS mapping of Employment Sites, Town Centres and Convenience Stores; train stations; bus stops on routes providing a six day a week service)</p>
<p>...avoid and reduce air pollution? (4.3)</p>	<p>In terms of location, air pollution is most closely linked to emissions from vehicles. Vehicles are more likely to be used as distances to destinations increase or travel by alternative more sustainable modes become less attractive. As an indication of effects on this aspect of the SA objective, the following is assumed:</p> <p><b>Proximity to employment and services:</b></p> <ul style="list-style-type: none"> <li>Where an allocation is within straight line walking distance (1,400 m) of an Employment Site or Town Centre there is a significant positive (++) effect on this aspect of the SA objective due to minimising travel distances, air pollution and enabling easier access to employment opportunities.</li> <li>Where an allocation is within 720 m of a food/convenience store, and/or a future neighbourhood centre within a strategic allocation if required by policy<sup>9</sup> a minor positive (+) effect is assumed.</li> <li>Where a site is within walking distance of a site or centre but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0).</li> </ul> <p><b>Proximity to transport services:</b></p> <ul style="list-style-type: none"> <li>Sites within walking distance of a rail station (1,400 m) or bus stop on a route providing a six day a week service (400 m) are assumed to have a significant positive (++) effect on this aspect of the SA objective.</li> <li>Other housing sites will be assessed as having a negligible (0) effect on this aspect.</li> </ul> <p>(Sources required: GIS mapping of Employment Sites, Town Centres and Convenience Stores; train stations; bus stops on routes providing a six day a week service)</p>

<sup>9</sup> assuming the neighbourhood centre is in the centre of the broad location

SA Question: Will the policy...	Assumptions for SA of Housing Sites
<p>...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)</p>	<p><b>Open Space</b></p> <p>Where a significant proportion (&gt;=25%) of an allocated site is within an existing area of open space<sup>10</sup> a significant adverse (--?) effect is assumed. Where a smaller part (5-25%) of an allocated site is within an existing open space a minor negative (-?) effect is assumed. In both cases uncertainty relates to the extent to which the development will contribute to alternative provision of open space that is lost to development. Sites that are &lt;5% open space are assumed to have a negligible (0) effect.</p> <p><b>Landscape Character</b></p> <p>Potential effects on landscape features and character will be assessed through the sensitivity score given for each landscape area assessed in the <del>Landscape Sensitivity and Capacity Study, Oct 2012 Assessment (2019):</del></p> <ul style="list-style-type: none"> <li>• Sites that are within areas that are assessed as being of low sensitivity are likely to have a negligible (0) effect on landscape character and features.</li> <li>• Sites that are within areas that are assessed as being of <del>medium</del> moderate or low-moderate sensitivity could have a minor negative (-?) effect on landscape character and features.</li> <li>• Sites that are within areas that are assessed as being of moderate-high, high or very high sensitivity could have a significant negative (--?) effect on landscape character and features.</li> </ul> <p>All other sites will be assessed as having an uncertain (?) effect on landscape character and features. In all cases, potential negative effects will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific siting, layout and design of the new development.</p> <p><b>Previously Developed Land</b></p> <p>If the Council identifies the site as previously developed land a significant positive effect (++?) will be assumed but with uncertainty relating to the appropriateness of the design of the development. Sites identified as a mix of greenfield and previously developed land are assumed to have a minor positive effect (+?). All other sites not identified as previously developed land are assumed to have a negligible (0) effect.</p> <p><b>Retaining Local Distinctiveness</b></p> <p>With regards to assessing the coalescence of towns and villages the WHBC Green Belt <del>Review Stage 2 (in preparation August/September 2014) report</del> Study Stage 3 (2019) will be used. <del>Looking at A 'significant' score presented for the 'local Green Belt</del></p>

<sup>10</sup> Categories include natural green space, amenity green space, outdoor sports facilities, parks and gardens, green corridors and civic spaces

SA Question: Will the policy...	Assumptions for SA of Housing Sites
	<p>purpose' (to Maintain the Existing Settlement Pattern) in the Green Belt review, a 'significant' contribution will be assumed to equate to a significant negative (--) SA effect, and a 'partial' contribution score presented for the 'local Green Belt purpose' in the Green Belt review will be assumed to equate to a minor negative (-) SA effect. All other sites not within the Green Belt, or scoring 'limited/or no' effect contribution in the Green Belt review, are considered to have negligible effects (0). <u>Where there is a 'limited/or no' contribution score, we will also check the score for Purpose 2 (Prevent neighbouring towns from merging), and take whichever is the greater contribution. This is because the Green Belt Study records 'limited/no effect' for the local purpose, where Purpose 2 applies, to avoid duplication (because the local purpose is effectively an extension of Purpose 2).</u></p> <p>Three scores will be assigned to this objective to reflect the different types of effects outlined above.</p> <p>Other townscape, design and green infrastructure aspects of this SA objective are not relevant to SA of the location of housing site options.</p> <p>(Sources required: settlement boundaries; landscape sensitivity study, Green Belt study, open space boundaries)</p>
<p>...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings? (4.5)</p>	<p>English Heritage bases its definition of the setting of a heritage asset on the previous national Planning Policy Statement 5, as <i>"the surroundings in which [the asset] is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral"</i><sup>11</sup>. Therefore, it is not possible to precisely determine effects on the setting of heritage assets during a desk-based strategic SA exercise such as this.</p> <p>As an indication of potential effects on heritage assets from housing development, the following is assumed:</p> <ul style="list-style-type: none"> <li>• A significant negative effect (--?) may occur where the development location is adjacent to or includes a designated heritage asset (e.g. listed building, Scheduled Monument, Registered Park and Garden or Conservation Area).</li> <li>• Where development is between 250 m and 1 km from heritage assets, a minor negative (-?) effect may occur.</li> <li>• Where sites are more than 1 km from any heritage designations, or the development involves the conversion of an existing building, a negligible (0) effect on this objective is assumed.</li> <li>• Where sites contain Areas of Archaeological Significance an uncertain minor negative effect is assumed (-?). The effect on archaeological finds is considered permanent.</li> </ul> <p>All potential negative effects are assumed to be uncertain as the actual effects on historic assets will depend on the exact siting, scale and type of development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic</p>

<sup>11</sup> English Heritage. The Setting of Heritage Assets REVISION NOTE June 2012.

SA Question: Will the policy...	Assumptions for SA of Housing Sites
	<p>development replaces a derelict brownfield site which is currently having an adverse effect). Scores may therefore need to be moderated depending on local circumstances.</p> <p>Development locations that will bring 'at risk' heritage assets (e.g. listed buildings) back into productive use will be assumed to have a significant positive effect (++?) on the basis that the fabric of the asset will therefore be restored and maintained but with uncertainty relating to whether the restoration/maintenance will be sympathetic to the asset's historic significance.</p> <p>(Sources required: GIS mapping of listed buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas, 'at risk' heritage assets to be brought back into use)</p>
<p>...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)</p>	<p>Similar to heritage assets, there is not a fixed distance at which biodiversity sites may be affected by new development, as the habitats and species for which biodiversity sites are designated are different, and different types of effects can be transmitted across different distances (e.g. air or water pollution may travel much further than noise or disturbance from physical presence of humans or dogs). Therefore, it is not possible to determine actual effects on the structure and function of habitats and populations of species during a desk-based strategic SA exercise such as this.</p> <p>As an indication of potential effects on biodiversity assets from housing site options, the following assumptions are made:</p> <ul style="list-style-type: none"> <li>• Where allocated sites overlap with an internationally (SAC, SPA, Ramsar), nationally (SSSI, NNR) or locally (Local Wildlife Site, Local Nature Reserve) designated wildlife site or area of Ancient Woodland, significant adverse(--) effects are assumed.</li> <li>• Where allocated sites are within 500m of the boundary of an internationally (SAC, SPA, Ramsar), nationally (SSSI, NNR) or 250m of a locally (Local Wildlife Site, Local Nature Reserve) designated wildlife site or area of Ancient Woodland, uncertain significant adverse (--?) effects are assumed.</li> <li>• Where allocated sites are between 500m and 1,000m from the boundary of an internationally (SAC, SPA, Ramsar), nationally (SSSI, NNR) or between 250m and 500m from a locally (Local Wildlife Site, Local Nature Reserve) designated wildlife site or area of Ancient Woodland, uncertain minor adverse (-?) effects are assumed.</li> <li>• Where allocated sites have a significant proportion of undesignated greenfield land (&gt;=25%) an uncertain (?) effect is assumed due to the potential for impacts on undesignated biodiversity interest.</li> </ul> <p>Where sites are within the remainder of the Plan area, the effect on this SA objective is assessed as negligible (0). The potential for previously developed land to support biodiversity is reflected under Objective 4.10.</p> <p>(Sources required: boundaries of designated wildlife sites)</p>

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SA Question: Will the policy...	Assumptions for SA of Housing Sites
<p>...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)</p>	<p>Development standards in relation to water efficiency are not related to site location therefore the SA of site allocations does not assess this; potential effects of water efficient design are instead dealt with in the SA of DM policies.</p> <p>(Sources required: None)</p>
<p>...avoid water pollution? (4.8)</p>	<p>The location of housing allocations may affect water quality due to spatial variations in the capacity of existing WwTWs and the foul and combined sewer network to accommodate additional demand from new development as well as variations in the sensitivity of groundwater and surface water receptors.</p> <p>The Water Cycle Study Scoping Report (2010) classifies each settlement in the Borough into categories relating to constraints to development. Required improvements to potable water and sewage treatment infrastructure don't constrain the amount of development going ahead but do affect timing of delivery (sites within settlements identified as requiring extensive infrastructure improvements to allow development will take longer to deliver). It is assumed that sites will not be developed until suitable infrastructure improvements have been implemented to ensure potable water supply and waste water are managed properly to avoid adverse effects on water quality and as such scores have not been assigned as a result of the Water Cycle Study.</p> <p>Groundwater Source Protection Zones represent where there is a risk of contamination of groundwater resources from certain activities. Housing construction within the inner or outer impact zones is assessed as having a minor adverse effect on the SA objective but with uncertainty (-?) relating to the construction activities (e.g. dewatering) and mitigation that would be employed. All other sites are considered to have negligible effects (0).</p> <p>Pollution risks to surface waters from construction of housing are assumed to be fully addressed by compliance with Environment Agency pollution prevention guidance and do not form part of the SA of options for Site Allocations.</p> <p>(Sources required: groundwater Source Protection Zones, EA groundwater Principles and practice (GP3) document).</p>
<p>...minimise the amount of waste generated and maximise the re- use, recycling or composting of waste that cannot be reduced? (4.9)</p>	<p>Waste generation is not related to site location therefore the SA of options for site allocations does not assess this; potential effects of resource use and minimising waste are instead dealt with in the SA of DM policies.</p> <p>(Sources required: None)</p>

SA Question: Will the policy...	Assumptions for SA of Housing Sites
<p>...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)</p>	<p>Where allocated sites are on high quality (grade 1, 2 or 3*) agricultural land there is assumed to be a negative effect on preserving soil quality:</p> <ul style="list-style-type: none"> <li>• Sites with a significant proportion (&gt;=25%) of grade 1 or 2 agricultural land are assumed to have a significant negative (--) effect.</li> <li>• Sites that are between 10% and 25% on grade 1 or 2 agricultural land are assumed to have a minor negative (-) effect.</li> <li>• Sites with a significant proportion (&gt;=25%) of grade 3 agricultural land are assumed to have a minor negative(-) effect.</li> </ul> <p>All other sites are considered to have a negligible effect (0) on high quality agricultural land. In addition:</p> <ul style="list-style-type: none"> <li>• Sites with a significant proportion (&gt;=25%) of brownfield land are assumed to have an uncertain minor positive effect (+?). The effect is considered to be uncertain at this stage until more information is known about the potential for the brownfield land to support habitats and species of biodiversity importance. The biodiversity value of brownfield land will be fully assessed and development would progress where adverse effects can be satisfactorily mitigated.</li> <li>• Sites with a significant proportion (&gt;=25%) of greenfield land are assumed to have a minor negative (-)effect.</li> <li>• ...resulting in overall mixed effects when taken together with effects on agricultural land.</li> </ul> <p>If the site is known to be contaminated and remediation would be a condition of housing development then assess as having a significant positive effects on this aspect of the objective (++); if contamination status is unknown assess effect as uncertain (?); if site is not thought to be contaminated assess effect as negligible (0).</p> <p>Note: Agricultural Land Classification maps do not distinguish between grade 3a, which is considered to be best and most versatile agricultural land, and grade 3b, which isn't.</p> <p>(Sources required: GIS mapping of agricultural land classifications, brownfield land)</p>
<p><b>Long-term Objective 5: Decent Housing</b></p>	
<p>...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)</p>	<p><b>Amount of housing</b></p> <p>To contribute towards a housing target need of around <del>16,000</del>15,200 homes (against a Full Objectively Assessed Housing Need (FOAHN) of 15,200 <del>16,000</del>), allocated sites that provide capacity for at least 5% of the housing target (in this instance at least <del>800</del>760 homes) are assumed to have a significant positive effect (++) . Sites that provide capacity for up to 5% of the housing target (1-5% which equates to <del>160-800</del>152-759 homes) are assumed to have a minor positive effect (+). All other sites with a capacity of less than 1% of the housing target are assumed to have a negligible effect (0).</p> <p>For Gypsy and Traveller sites the figure for pitch need is 68 (net). Therefore any site that provides capacity for at least 5% of the pitch need (in this instance at least 4 pitches), are assumed to have a significant positive effect (++) . Sites that provide capacity for up to 5% of</p>



SA Question: Will the policy...	Assumptions for SA of Housing Sites
	<p>the housing target (1-5% which equates to 1-3 homes) are assumed to have a minor positive effect (+). All other sites with a capacity of less than 1% of the housing target are assumed to have a negligible effect (0).</p> <p><b>Affordable housing</b></p> <p>Policy SP 7 requires that, subject to viability,</p> <ul style="list-style-type: none"> <li>• development within Hatfield proposing 11 or more dwellings or land with an area of 0.5 ha or more should provide 25% affordable dwellings.</li> <li>• development within Welwyn Garden City proposing 11 or more dwellings or land with an area of 0.5 ha or more should provide 30% affordable dwellings</li> <li>• development within Excluded Villages proposing 11 or more dwellings or land with an area of 0.5 ha or more should provide 35% affordable dwellings</li> </ul> <p>Sites of this size are assessed as having a significant positive (++) effect on this aspect of the SA objective. Sites below these thresholds and Gypsy and Traveller sites are not required to make affordable provision due to viability evidence. They will therefore be assessed as having a negligible (0) effect.</p> <p><b>Dwellings for older people</b></p> <p>Emerging <del>Core Strategy</del> <u>Local Plan</u> policy <del>CSP</del> <u>7</u> requires that, subject to viability and design restrictions, development proposing 5 or more dwellings should include 20% of <del>market dwellings to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings' (or updated equivalent) meeting Lifetime Homes standards.</del> Sites identified with potential to provide 5 dwellings or more will therefore be assessed as having a significant positive (++) effect on this aspect of the SA objective. Sites below this threshold and Gypsy and Traveller sites are not required to <del>make Lifetime Homes provision meet this standard.</del> They will therefore be assessed as having a negligible effect (0).</p>
<p>...ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy? (6.1)</p>	<p>For any site located within an Employment Site the loss of employment land could result in a negative effect for this objective. This would be a significant negative effect (-) if all of the employment land is lost or a minor negative effect (-) if less than 50% of the employment land is lost.</p> <p>All other sites would be negligible (0).</p>

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...encourage economic investment in those areas most in need of regeneration, in a way that will benefit those most in need of rewarding employment? (6.2)	Not applicable to housing sites.
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	<p>Housing sites within straight walking distance (1,400 m) of Welwyn Garden City or Hatfield town centres are assumed to provide support for their vitality, and will result in a minor positive (+) effect. Sites within the town centres will result in a significant positive effect (++).</p> <p>All other sites are likely to have a negligible effect (0). (Sources required: town centre boundaries).</p>
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	Not applicable to housing sites.
...avoid the sterilisation of mineral resources? (6.5)	<p>Some areas of Hertfordshire have been identified as Preferred Areas for mineral extraction in the Hertfordshire Minerals Local Plan, 2007. This does not mean that development could not occur in these locations, but that the County Council would need to be consulted to determine whether prior extraction of the mineral resource was required before development. Since the outcome of this consultation will be unknown at the time the site is allocated, an uncertain effect is identified on this SA objective.</p> <p>Sites that overlap a Preferred Area are assumed to have an uncertain minor negative effect (-?). (Sources required: Minerals Preferred Areas)</p>
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	<p>The effects of housing development on this objective will depend on the availability of school and college places to serve the new residents.</p> <p>Where sites are within straight line walking distance (1,400 m) of existing education establishments (nurseries, schools or</p>

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	<p>colleges<sup>912</sup>), a potential significant positive (++) effect may occur because it could be easier and more resource/cost efficient to expand those existing facilities to accommodate new residents as required, rather than building new schools to serve the new residents.</p> <p>Where a site is within walking distance (1,400 m) of existing education establishments (nurseries, schools or colleges<sup>9</sup>) but there are potential barriers to access for all ages and abilities (e.g. topography, major road), or a strategic allocation where a new school is required, a minor positive uncertain (+?) rather than a significant positive score is given.</p> <p>All other sites are assumed to have a negligible effect (0).</p> <p>(Sources required: GIS mapping of education facilities; OS base map)</p>

<sup>12</sup> The University of Hertfordshire has not been included as it is assumed that sites are not being developed for student housing

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## Appendix B

### Appraisal Matrices for Additional Site Options

#### Land at 2 New Road – Dig1

<b>Site – Land at 2 New Road</b>	Dig1	<b>Potential Capacity</b>	25 - 130	<b>Policy</b>	General Development Management Policies
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SA Objective	Likely Effects	Commentary	Mitigation recommendations (focussing on significant adverse effects)
<b>Long-term Objective 1: Health Improvement</b>			
1.1 ...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? 1.2 ...lead to improved health for all?	+	<p>The site is within straight line walking distance of several types of community facilities including:</p> <ul style="list-style-type: none"> <li>- Within 720m of Welwyn North Stores,</li> <li>- Within 1,400m: Welwyn Garden City Industrial Area Employment Area, Digswell Playing Field, Digswell Pre-School, St. John's Church of England School, and Cricket Pitch.</li> </ul> <p>The site is not within an area classified as being within 20% of the most deprived areas nationally.</p> <p>Overall a minor positive effect is expected as new residents would have access to a range of existing services.</p>	Not required, but SP 1: Sustainable Development promotes the increased supply of housing and contributes to the reduction of social and health inequalities.
<b>Long-term Objective 2: Safer Communities</b>			
2.2 Ensure there is no increase in flood risk to people or property, taking into account climate change?	0	The site is not within Flood Zones 2 or 3 and does not contain flood storage areas; therefore a negligible effect is expected.	Not required, but <b>SADM 14: Flood Risk and Surface Water Management</b> Supporting text-some allocations will need to consider fluvial and surface water flood risk, albeit of limited extent.
<b>Long-term Objective 4: Improving the Environment</b>			
4.2 Significantly reduce greenhouse gas emissions from transport?	++	Proximity to employment and services: This site is within walking distance (1,400m) of Welwyn Garden City Industrial Area Employment Site but it is not within 720m of a food/convenience store. A significant positive effect is expected.	Not required.
	++	Proximity to transport services: This site is within 400m of a bus stop on a route providing a six day a week service. A significant positive effect is therefore expected.	Not required.
4.3 Avoid and reduce air pollution	++	Proximity to employment and services: This site is within walking distance (1,400m) of Welwyn Garden City Industrial Area Employment Site and within 720m of a food/convenience store. A significant positive effect is therefore expected.	Not required.
	++	Proximity to transport services: This site is within 400m of bus stops on a route providing a six day a week service and within 1,400m of Welwyn North Railway Station. A significant positive effect is therefore expected.	Not required.

SA Objective	Likely Effects	Commentary	Mitigation recommendations (focussing on significant adverse effects)
4.4 Protect and enhance open space and landscape character, retaining local distinctiveness?	0	Open Space: Less than 5% of the site is located within an existing open space and therefore, this site is assumed to have a negligible effect on open space.	Not required, but <b>SP 13: Infrastructure Delivery</b> - Developers will be required to contribute to the reasonable costs of providing new green infrastructure, required as a result of their proposals.
	-?	Landscape character: The site is assessed as having a moderate landscape sensitivity and therefore could have a minor negative effect on landscape character.	<b>SP9: Place making and high quality design</b> - Proposals should relate well to their surroundings, local distinctiveness, wider townscape and landscape.
	0	Previously Developed Land: This site not identified as previously developed land are assumed to have a negligible effect.	Not required
	0	Retaining local distinctiveness: The WHBC Green Belt Study Stage 3 (2019) scored the site as having a limited to no contribution to maintaining the existing settlement pattern (Local Purpose) and a limited to no contribution to preventing neighbourhood towns from merging (Green Belt Purpose 2) and therefore this site is assumed to have a negligible effect against this specific issue.	Not required but <b>SP9: Place making and high quality design</b> states that proposals should relate well to their surroundings, local distinctiveness, wider townscape and landscape.
4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?	--?	The site is adjacent to Tewin Water Registered Park and Garden and is within 250m – 1000m of 15 Grade II Listed Buildings and one Grade II* Listed Building; therefore, a significant negative effect is expected, although this is uncertain as the actual effects on historic assets will depend on the exact siting, scale and type of development and opportunities which may exist to enhance the setting of heritage features, or protect their settings through screening.	<b>SP1: Delivering Sustainable Development</b> - heritage assets should be protected and enhanced.  <b>SADM 15: Heritage</b> – proposals should sustain and enhance heritage assets and respect the character, appearance and setting of the asset in terms of design, scale, materials and impact on key views.
4.6 Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?	-?	The site is between 250m and 500m of Tewin Water Mimram Valley LWS, Digswell Lake LWS, Digswell Meadows South LWS, Scrub Slope East of Digswell LWS, Lockleys Wood LWS, Lockleys Wood Meadow LWS, and Harmer Green Area LWS; therefore a minor negative uncertain effect is expected. The uncertainty is also expected as the site is on more than 25% of greenfield land which could result in the loss of undesignated biodiversity interests.	<b>SP 11: Protection and enhancement of critical environmental assets</b> - Appropriate protection, enhancement and management of ecological assets.  <b>SADM 16: Ecology and Landscape</b> - Conserve and enhance the borough's natural and historic landscape.
4.8 Avoid water pollution	-?	The site is within an outer source protection zone, therefore a minor negative effect is expected, although this is uncertain and dependent on the type of construction activity and mitigation that will be employed.	<b>SP 10: Sustainable design and construction</b> - water sensitive design principles should be integrated into development proposals to sustainably address water supply, consumption and quality.
4.10 Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land	-	Majority of the site is not classified as agricultural land (it is classified as 'urban'), and predominantly greenfield land, and as such a minor negative effect is expected.	<b>Policy SP 11: Protection and enhancement of critical environmental assets</b> - protect the best and most versatile agricultural land.
<b>Long-term Objective 5: Decent Housing</b>			

SA Objective	Likely Effects	Commentary	Mitigation recommendations (focussing on significant adverse effects)
5.1 Provide the right amount, type and tenure of housing to meet identified local needs?	0	Amount of housing: The site provides capacity for 130 homes which is less than 1% of the Borough's housing target (around 15,200) and therefore is assumed to have a negligible effect.	Not required but <b>SP1 Delivering Sustainable Development</b> requires new development to contribute to the creation of mixed and sustainable communities.
	++	Affordable housing: The site provides the capacity for 25-130 homes and therefore it is assumed the site would accommodate 35% affordable dwellings. A significant positive effect is expected.	Not required.
	++	Dwellings for older people: The site provides the capacity for 25-130 homes and therefore it is assumed the site would include 20% of dwelling to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings' (or updated equivalent) . A significant positive effect is expected.	Not Required.
<b>Long-term Objective 6: A Thriving Economy</b>			
6.1 Ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy?	0	This site is not located within an Employment Site. A negligible effect is therefore expected.	Not required.
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	0	This site is not within 1,400m of a town centre; therefore a negligible effect is expected.	Not required.
6.5 Avoid sterilisation of mineral resources	0	According to the Minerals Local Plan 2007 the site is not within a preferred area for mineral extraction, therefore a negligible effect is expected.	Not required.
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	++?	The site is within straight line walking distance (1,400 m) of local education facilities; therefore an uncertain significant positive effect may occur because it could be easier and more resource/cost efficient to expand those existing facilities to accommodate new residents as required, rather than building new facilities to serve the new residents.	Not required.

## Land to the east of Danesbury Park Road –OMH6

<b>Site – Land to the east of Danesbury Park Road</b>	OMH 6	<b>Potential Capacity</b>	25	<b>Policy</b>	General Development Management Policies
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SA Objective	Likely Effects	Commentary	Mitigation recommendations (focussing on significant adverse effects)
<b>Long-term Objective 1: Health Improvement</b>			
1.1 ...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? 1.2 ...lead to improved health for all?	+	The site is within straight line walking distance of three community facilities including:  - Within 1,400m: Oaklands Primary School, Woods of Roman Road Amenity Green Space, and Guessens, Codicote Road.  The site is not within an area classified as being within 20% of the most deprived areas nationally.  Overall a minor positive effect is expected as new residents would have access to a range of existing services.	Not required, but <b>SP 1: Sustainable Development</b> promotes the increased supply of housing and contributes to the reduction of social and health inequalities.
<b>Long-term Objective 2: Safer Communities</b>			
2.2 Ensure there is no increase in flood risk to people or property, taking into account climate change?	0	The site is not within Flood Zones 2 or 3 and does not contain flood storage areas; therefore a negligible effect is expected.	Not required, but <b>SADM 14: Flood Risk and Surface Water Management</b> Supporting text-some allocations will need to consider fluvial and surface water flood risk, albeit of limited extent.
<b>Long-term Objective 4: Improving the Environment</b>			
4.2 Significantly reduce greenhouse gas emissions from transport?	0	Site is not within a walking distance (1400m) away from an Employment Centre, nor a Town Centre. There are no food/convenience stores within a close proximity to the site, therefore, a negligible effect was identified.	Not required.
	0	Proximity to transport services: This site is more than 400m of the nearest bus stop. A negligible effect is therefore expected.	Not required.
4.3 Avoid and reduce air pollution	0	Site is not within a walking distance (1400m) to any Employment Centre, therefore a negligible effect is identified.	Not required.
	0	Proximity to transport services: This site is more than 400m of the nearest bus stop. A negligible effect is therefore expected.	Not required.
4.4 Protect and enhance open space and landscape character, retaining local distinctiveness?	0	Less than 5% of the site is located within an existing open space and therefore a negligible effect is expected.	Not required, but <b>SP 13: Infrastructure Delivery-</b> Developers will be required to contribute to the reasonable costs of providing new green infrastructure, required as a result of their proposals.
	-?	Landscape character: The site is assessed as having a low-moderate landscape sensitivity and therefore could have a minor negative effect on landscape character.	<b>SP9: Place making and high quality design-</b> Proposals should relate well to their surroundings,



SA Objective	Likely Effects	Commentary	Mitigation recommendations (focussing on significant adverse effects)
			local distinctiveness, wider townscape and landscape.
	0	Previously Developed Land: This site not identified as previously developed land are assumed to have a negligible effect.	Not required
	0	Retaining local distinctiveness: The WHBC Green Belt Study Stage 3 (2019) scored the site as having a limited to no contribution to maintaining the existing settlement pattern (Local Purpose) and a limited to no contribution to preventing neighbourhood towns from merging (Green Belt Purpose 2) and therefore this site is assumed to have a negligible effect against this specific issue.	Not required but <b>SP9: Place making and high quality design</b> states that proposals should relate well to their surroundings, local distinctiveness, wider townscape and landscape.
4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?	-?	The site is not adjacent to any heritage assets, however it is within 250m – 1000m to Welwyn Conservation Area and 12 Grade II Listed Buildings; therefore, a minor negative effect is expected although this is uncertain as the actual effects on historic assets will depend on the exact siting, scale and type of development and opportunities which may exist to enhance the setting of heritage features, or protect their settings through screening.	<b>SP1: Delivering Sustainable Development-</b> heritage assets should be protected and enhanced.  <b>SADM 15: Heritage</b> – proposals should sustain and enhance heritage assets and respect the character, appearance and setting of the asset in terms of design, scale, materials and impact on key views.
4.6 Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?	--?	The site is adjacent to the Grassland E of Danesbury Hospital LWS and within 250m of Danesbury Park LWS and LNR. Therefore a significant negative uncertain effect is expected. The uncertainty is also expected as the site is on more than 25% of greenfield land which could result in the loss of undesignated biodiversity interests.	<b>SP 11: Protection and enhancement of critical environmental assets-</b> Appropriate protection, enhancement and management of ecological assets.  <b>SADM 16: Ecology and Landscape-</b> Conserve and enhance the borough's natural and historic landscape.
4.8 Avoid water pollution	0	Site is located outside inner and outer water protection zones, therefore the development should have a negligible effect.	Not required.
4.10 Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land	-	Majority of the site is not classified as agricultural land (it is classified as 'urban'), and predominantly greenfield land, and as such a minor negative effect is expected.	<b>Policy SP 11: Protection and enhancement of critical environmental assets-</b> protect the best and most versatile agricultural land.
<b>Long-term Objective 5: Decent Housing</b>			
5.1 Provide the right amount, type and tenure of housing to meet identified local needs?	0	The site has the capacity to deliver 25 dwellings, which accounts for less than 1% of the housing target, and therefore the development will have a negligible effect.	Not required but <b>SP1 Delivering Sustainable Development</b> requires new development to contribute to the creation of mixed and sustainable communities.
	++	Affordable housing: The site provides the capacity for 25 homes and therefore it is assumed the site would accommodate 35% affordable dwellings. A significant positive effect is expected.	Not required.
	++	Dwellings for older people: The site provides the capacity for 25 homes and therefore it is assumed the site would include 20% of dwelling to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings'	Not Required.

SA Objective	Likely Effects	Commentary	Mitigation recommendations (focussing on significant adverse effects)
		(or updated equivalent) . A significant positive effect is expected.	
<b>Long-term Objective 6: A Thriving Economy</b>			
6.1 Ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy?	0	This site is not located within an Employment Site. A negligible effect is therefore expected.	Not required.
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	0	This site is not within 1,400m of a town centre; therefore a negligible effect is expected.	Not required.
6.5 Avoid sterilisation of mineral resources	0	According to the Minerals Local Plan 2007 the site is not within a preferred area for mineral extraction, therefore a negligible effect is expected.	Not required.
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	++?	The site is within straight line walking distance (1,400 m) of local education facilities therefore an uncertain significant positive effect may occur because it could be easier and more resource/cost efficient to expand those existing facilities to accommodate new residents as required, rather than building new schools to serve the new residents.	Not required.

# Examination of the Welwyn Hatfield Local Plan

## List of Sites

December 2021



## Housing Supply Note

Housing Supply comprises completions (2016-2021), Commitments (taken at 31<sup>st</sup> March 2021), windfall development, small sites and allocations. Table 2 details the sites and their capacity assumptions that the Inspector has found to be sound. Tables 3-6 detail the additional sites and their respective capacity assumptions under Option A, B, C and D.

**Table 1: Summary table showing housing supply under Options A, B, C and D.**

Supply	Option A	Option B	Option C	Option D
Completions 2016 – 2021	2,514	2,514	2,514	2,514
Commitments at 31 March 2021	806	806	806	806
Small sites	14	14	14	14
Windfall	1,668	1,668	1,668	1,668
Sound Sites (Table 2)	8,557	8,557	8,557	8,557
Additional Sites (Tables 3-6)	1,820	1,659	1,800	1,655
<b>Total</b>	<b>15,379</b>	<b>15,218</b>	<b>15,359</b>	<b>15,214</b>

**Table 2: Sound allocated sites**

Settlement	HELAA Red	Plan Ref	Site	Capacity
WGC	Pea02b	SDS3	Broadwater Road West SPD Site	2003
WGC	WGC5	SDS2	South east of Welwyn Garden City	600
WGC	WGC4/4a	SDS1	North east of Welwyn Garden City	845
WGC	WGC1	HS2	Creswick	300
WGC	Han91	HS6	Land at Gosling Sports Park, Stanborough Road	100
WGC	Pea02c	SDS4	Broadwater Road West SPD Site (West) - Pall Mall	171
WGC	Hal03	HS4	Ratcliff Tail Lift Site, Bessemer Road	110
WGC	Han40	MUS1	Welwyn Garden City Town Centre North SPD Site	100
WGC	Pea08	HS3	80 Bridge Road East	32
WGC	Pan01b	HS1	Land at Bericot Way (North) (21 dwellings)	0
WGC	Pea24	HS8	St Michaels House, Holwell Road	22
WGC	Hol19	HS5	Hyde Valley House, Hyde Valley	17
WGC	Pea102	SDS4	Bio Park, Broadwater Road	250
WGC	Han40a		Town Centre North- Campus	250
WGC	Pea104		YMCA, 90 Peartree Lane	29
WGC	Hol23		Neighbourhood Centre, Hollybush Lane	16
Hatfield	Hat1	SDS5	North West Hatfield	1750
Hatfield	Hat11	HS11	Land at Southway	120
Hatfield	HW100	MUS3	High view (Hilltop) SPD Site	140
Hatfield	HC100b	MUS2	1-9 Town Centre	71
Hatfield	HE23	HS14	L Kahn Manufacturing, Wellfield Road	62
Hatfield	HS91	HS13	Land south of Filbert Close	37
Hatfield	HS31	HS10	Garages at Hollyfield	12
Hatfield	HE80	HS9	Land at Onslow St Audrey's School, Howe Dell	86

Hatfield	HC11		Meridian House, The Common	11
Hatfield	HE17		Link Drive (Site F)	80
Hatfield	HC08		Lemsford Road (Site H)	32
Hatfield	HSW92		Minster Close	49
Hatfield	HSW94		College Lane	115
Woolmer Green	WGr1	HS15	Land east of London Road	150
O&MH	OMH5	HS17	Land rear of 2a-12 Great North Road	20
O&MH	GTLAA04	HS32	SG - Four Oaks, Great North Road	6
O&MH	OMH8	HS16	2 Great North Road	5
Welwyn	Wel4	HS19	Sandyhurst, The Bypass	30
Welwyn	Wel11	HS18	The Vineyards	30
Welwyn	Wel3	HS20	School Lane	9
Welham Green	WeG1		51 Welham Manor	16
Welham Green	WeG3a		Land South of Welham Manor	68
Welham Green	WeG10		Dixons Hill Road	120
Welham Green	WeG4b	SDS7	Marshmoor	100
Welham Green	GTLAA01	HS35	Foxes Lane, Dixons Hill Road	12
Brookmans Park	BrP13	HS21	Land west of Golf Club Road	14
Brookmans Park	BrP4	HS22	Land west of Brookmans Park Railway Station	300
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	10
Little Heath	LHe1	HS25	Land north of Hawkshead Road	35
Cuffley	Cuf6	HS28	Land south of Northaw Road East	121
Cuffley	Cuf1	HS27	Land at The Meadway	60
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	5
Little Heath	LHe4/5		Part of Studlands/Videne, Hawkshead Road	36
<b>Total</b>				<b>8,557</b>

**Notes:** HS1 Land at Bericot Way (21 dwellings) included as a completion.

**Table 3: Option A additional sites**

Settlement	HELAA ref	Local Plan Ref	Site	Capacity
O&MH	OMH9		Land to the rear of 19-23 The Avenue	25
Digswell	Dig1		Land east of New Road	80
Rural areas	HAT15	SDS6	Symondshyde	1500
Welham Green	WeG12		Pooleys Lane	40
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	75
Cuffley	Cuf12	HS29	Land North of Northaw Road East	73
Little Heath	LHe4/5a		Part of Studlands/Videne, Hawkshead Road	27
<b>Total</b>				<b>1,820</b>

**Table 4: Option B additional sites**

Settlement	HELAA ref	Local Plan Ref	Site	Capacity
Woolmer Green	WE100		Marshalls	34
Woolmer Green	WGr3		Land west Londron Road	25
O&MH	OMH9		Land to the rear of 19-23 The Avenue	25
Welwyn	Wel1		Land at Kimpton Road	178
Welwyn	Wel2		Land adj Welwyn Cemetary	40
Welwyn	Wel15		Fulling Mill Lane	14
Welwyn	Wel6		Land at Kimpton Road, Welwyn	16
Digswell	Dig1		Land east of New Road	116
Lemsford	StL13		Land at Roebuck Farm	27
Stanborough	StL15		East of Great North Road	8
Stanborough	StL1		North of New Road	90
Welham Green	WeG15		Land at Potterells Farm	72
Welham Green	WeG12		Pooleys Lane	83
Welham Green	WeG6		Skimpans Farm	73
Brookmans Park	BrP4a	HS22	Land West of Brookmans Park Railway Station	178
Brookmans Park	BrP12		Peplins	125
Brookmans Park	BrP1		Upper Bell Lane	104
Cuffley	Cuf15		King George V Playing Fields	176
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	75
Cuffley	Cuf12	HS29	Land North of Northaw Road East	73
Little Heath	BrP7		Land south of Hawkshead Road	100
Little Heath	LHe4/5a		Part of Studlands/Videne, Hawkshead Road	27
<b>Total</b>				<b>1,659</b>

**Table 5: Option C additional sites**

Settlement	HELAA ref	Local Plan Ref	Site	Capacity
Woolmer Green	WE100		Marshalls	34
O&MH	OMH9		Land to the rear of 19-23 The Avenue	25
Welwyn	Wel1		Land at Kimpton Road	178
Welwyn	Wel2		Land adj Welwyn Cemetary	40
Welwyn	Wel15		Fulling Mill Lane	14
Welwyn	Wel6		Land at Kimpton Road, Welwyn	16
Digswell	Dig1		Land east of New Road	100
Lemsford	StL13		Land at Roebuck Farm	27
Rural areas	HAT15	SDS6	Symondshyde	500
Welham Green	WeG15		Land at Potterells Farm	56
Welham Green	WeG12		Pooleys Lane	83
Welham Green	WeG6		Skimpans Farm	73
Brookmans Park	BrP4a	HS22	Land West of Brookmans Park Railway Station	178
Brookmans Park	BrP12		Peplins	125
Cuffley	Cuf15		King George V Playing Fields	176

Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	75
Cuffley	Cuf12	HS29	Land North of Northaw Road East	73
Little Heath	LHe4/5a		Part of Studlands/Videne, Hawkshead Road	27
<b>Total</b>				<b>1,800</b>

**Table 6: Option D additional sites**

Settlement	HELAA ref	Local Plan Ref	Site	Capacity
WGC	Pea02b	SDS3	Broadwater Road West SPD Site	-400*
Woolmer Green	WE100		Marshalls	34
O&MH	OMH9		Land to the rear of 19-23 The Avenue	25
Digswell	Dig1		Land east of New Road	80
Rural areas	HAT15	SDS6	Symondshyde	1500
Welham Green	WeG12		Pooleys Lane	40
Welham Green	WeG6		Skimpans Farm	73
Brookmans Park	BrP4a	HS22	Land West of Brookmans Park Railway Station	128
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	75
Cuffley	Cuf12	HS29	Land North of Northaw Road East	73
Little Heath	LHe4/5a		Part of Studlands/Videne, Hawkshead Road	27
<b>Total</b>				<b>1,655</b>

\*The total of Option D has been reduced from 15,614 to 15,214 allowing for a 400 dwelling reduction in capacity at SDS3 Broadwater Road West SPD site, a site included as a sound allocation in Table 2.

**Table 7: Other sites considered by the Inspector**

Table 7 lists the lists the sites that have been considered by the Inspector but have not been included within the Options A, B, C or D.

Settlement	HELAA ref	Local Plan Ref	Site	Capacity / use	Conclusion
WGC	Pea97		Norton Building, Bridge Road	122	Inspector concluded that, proposals to use these sites, some of which have buildings that are currently used for Class B or related uses, for housing would be contrary to Policy SP8 and Policy SADM 10.
WGC	Pea103		29 Broadwater Rd	128	
WGC	Pea106		73-83 Bridge Rd East	235	
WGC	Pea105		61 Bridge Road	21	
WGC	WGC5	SDS2	[Part of] South east of Welwyn Garden City	550	Inspector concluded that, from the evidence before the examination, and largely because of the elevational relationships, he does not consider the proposed mitigation, to screen this area from the wider GB to the south, would be sufficient, within the plan period and even beyond, to overcome

					concerns. The Inspector also concluded, that there would be unacceptable harm to the openness of the GB and that this part of the site should not be proposed for development at this time.
WGC	Hal02	HS7	Land at Waterside	20	Proposal deleted following the Inspector's conclusion that the development would have negative impact on the attractive roadside open spaces, which are a distinctive part of the Garden City's green infrastructure and character.
Rural Area	GTLAA09	HS34	Coopers Green Lane, Hatfield	10 pitches	As part of the Local Plan Examination Hearing Session 4, it was proposed that the site be deleted and alternative provision for 10 Gypsy and Traveller pitches be made on other sites.
Stanborough	StL17		Land at Great North Road	5 (net 4) pitches	The Inspector noted that the southern part of the site protrudes into a critical Green Belt gap. Consequently, development on the southern part of this site, beyond the extent of the existing built development on the other side of Great North Road, is unlikely to be found sound.
Welham Green	WeG17		Land south of Dixons Hill Road	Primary School	The Inspector noted that such a location on the western edge of the village, would not be sustainable from a movement perspective. In the context of the availability of land that is better related to the existing settlement and the options being considered for its expansion, the Inspector concluded the site is not a sustainable location for a school.
Brookmans Park	BrP34		Brookmans Park Transmitting Station	300 + employment	The Inspector noted that in comparison with other options, this is not a particularly sustainable site for new residential development. The Inspector agrees with the Council's findings and has concluded that the site is unlikely to be found sound.
Cuffley		HS31	Land west of St Martin de Porres Catholic Church	5	Inspector concluded that if the site's delivery cannot be appropriately confirmed, then it should be removed from the plan.