

# **Appendix A5**

**Main Issues Soundness Summary  
Draft Local Plan Proposed Submission (DLPPS) Policies Maps**

## Policies Map Sheet 1

PSPM no.	Main issues	Changes sought	WHBC comment
711	<p><b>The development of site HS15 (WGr1) would increase coalescence between Woolmer Green and Knebworth</b></p> <p>The plan is not <b>justified, effective</b> or <b>consistent with national policy</b> because site HS15 (WGr1) makes a significant contribution to the fragile gap between Woolmer Green and Knebworth.</p>	None stated	Policies Map 1 shows that with the exception of land for access, site WGr1 would not bring development any further north than existing. Whilst there is a fragile gap between Knebworth and Woolmer Green, development of WGr1 would therefore not reduce this gap. <b>No change.</b>
2, 34, 711	<p><b>An alternative brownfield site is available for development</b></p> <p>The plan is <b>not positively prepared, justified, effective</b> or <b>consistent with national policy</b> because there is a brownfield site available for development, therefore exceptional circumstances do not exist to build on Green Belt land.</p>	The brownfield site (Entech House) could accommodate new housing as well as sustainable employment land.	<p>The Council has justified the need to retain and allocate land for employment uses. The Local Plan Consultation document 2015 (paragraph 12.12) stated the Council's intention to protect employment land in Woolmer Green and to designate a new employment area. The Entech House site failed the Stage 1 Assessment of the HELAA 2016 (Appendix D) as it is located within a proposed Employment Area.</p> <p>The Council has also justified the need exceptionally to release a limited amount of land from the Green Belt for development. If the Entech House site is allocated for housing instead of WGr1, because it is a smaller site, this would result in a loss of</p>

			employment land and increase the shortfall between target and the OAN. <b>No change.</b>
2	<p><b>Impact of the allocation of HS15 (WGr1) on a Grade II listed building</b></p> <p>The plan is <b>not positively prepared, justified, effective</b> or <b>consistent with national policy</b> because of the adverse impact on the Grade II listed Payne's Farm.</p>	None stated	<p>The HELAA 2016 highlights the need for a landscape buffer to mitigate impact of development on the adjacent listed building. English Heritage (now Historic England) commented at the Local Plan Consultation 2015 stage that it should be possible to develop site WGr1 without unacceptable harm to the significance of the farmhouse. A requirement for a landscape buffer and a Heritage Impact Assessment is also set out in Table 11 of the Plan. <b>No change.</b></p>
34	<p><b>Disproportionate increase in dwellings</b></p> <p>The plan is <b>not positively prepared, justified, effective</b> or <b>consistent with national policy</b> because 150 new houses is too much in Woolmer Green.</p>	None stated	<p>Proposed growth of 150 dwellings on site WGr1 at Woolmer Green is not considered to be disproportionate. <b>No change.</b></p>
761, 762	<p><b>Supports the employment area EA10</b></p> <p>The whole of Lessiter's Limited site is designated as an employment area, allowing flexibility for extension.</p>	None stated.	Noted.
761, 762	<p><b>The existing boundary limits Cawdor Stone Group Ltd from expanding or linking to other sites/land</b></p> <p>The plan is <b>not justified</b> or <b>effective</b> because the employment area zoning ends directly on Cawdor Stone's boundary and severely limits the ability for Cawdor to expand or link to other sites/land.</p>	Move the boundary of Employment Area EA10 east, in line with the boundary behind Lessiter's Ltd and	<p>The land concerned forms part of the master-planned area for site WGr1 and is shown as an area for a small shop/café. It is not available for employment use as an</p>

		extend zoning to the south.	extension to the employment site referred to in this representation. <b>No change.</b>
2, 763, 764,	<p><b>The Entech site is not a viable business premises</b></p> <p>The plan is <b>not justified</b> or <b>effective</b> because it requires high investment to bring it up to standard.</p>	Reallocate the Entech House site from employment to housing and retain HS15 (WGr1) predominately as Green belt part from a buffer strip.	No evidence has been presented to the Council that the site is no longer suitable as employment land. Site EA10 contributes to the employment land provision for the borough. <b>No change.</b>
711	<p><b>The amount of employment land allocated to Woolmer Green is disproportionate</b></p> <p>The plan is not <b>justified, effective</b> or <b>consistent with national policy</b> because large scale businesses are not suitable for small villages.</p>	<i>None stated</i>	The allocation of employment land in Woolmer Green is considered appropriate for the settlement. Businesses in the village are not large scale, they reflect the scale of small to medium sized businesses often found in smaller settlements. <b>No change.</b>
DLPPS 1235	<b>Remove site Dig1 from the Green Belt</b>	Allocate for residential development.	The site lies within an area which makes a significant contribution to the purposes of the Green Belt and there are no exceptional circumstances for its release as the site has been found unsuitable for development. <b>No change</b>
34	<p><b>General Comments</b></p> <p><b>Local infrastructure is already at its peak</b></p>		Infrastructure comments not relevant to Policies Map. <b>No change</b>

## Policies Maps Sheet 2

PSPM no.	Main issues	Changes sought	WHBC comment
751	<p><b>UOL169 is not amended to facilitate the retention of the school on the site</b></p> <p>The plan is <b>not positively prepared</b> or <b>effective</b> because the Howe Dell School Playing Fields (UOL 169) boundary needs to be amended to facilitate the retention of the school on the site.</p>	<p>Adjustment of UOL 169 to remove the area of the school buildings from the area designated as 'Urban Open Land'.</p>	<p>UOL designation existed before the school. Special needs school moved to this site (as a temporary measure). Because of this, the expectation was that the buildings would be removed at the end of the temporary permission. Planning permission has been renewed but for another temporary period. The land could therefore be returned to its former status. <b>No change.</b></p>
758	<p><b>Waste sites at New Barnfield and Roehyde have not been removed from the green belt</b></p> <p>The plan is <b>not positively prepared, effective</b> or <b>consistent with national policy</b> because the plan does not complement the Waste Local Plan/Waste Site Allocations document in bringing about a facilitatory environment for delivery of the objectively assessed waste needs of Hertfordshire.</p>	<p>Remove New Barnfield and Roehyde waste sites from the Green Belt in line with the adopted Waste Site Allocations Development Plan Document.</p> <p>Deletion of New Barnfield as a Major Developed Site in the Green Belt from SADM</p>	<p>New Barnfield: This site is allocated in the Hertfordshire Waste Local Plan for waste management uses and is a designated Major Developed Site however planning permission was refused for an energy from waste facility. Whilst the site remains allocated in the Waste Local Plan the County Council have announced that they have commenced a review of the Plan and should the site not be required for waste management purposes consider it could come forward for housing employment and or a primary school. Given that the Council do not think it should be removed from the Green Belt it is appropriate to retain its designation as a Major</p>

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		34 and the Policies Map.	<p>Developed Site. The allocation is shown on the Policies Map</p> <p>Roehyde: This site is split between the administrative areas of Welwyn Hatfield and St Albans CDC. It has a long list of potential waste uses but none have been confirmed. There is further uncertainty as the County Council have announced a review of the Waste Local Plan and it is unclear if the site will still be required for waste management purposes. The allocation is shown on the Policies Map.</p> <p>There is considerable uncertainty over whether these sites will still be required for waste management use and there are no details over the scale or quantum of development. The Council do not consider exceptional circumstance exist at the current time to warrant an alteration to the Green Belt boundary in these locations.</p> <p><b>No change.</b></p>
765	<p><b>No evidence to support the Gypsy and Traveller pitch provision figure and timescale for their delivery, for HS34 (GTLAA09)</b></p> <p>The plan is <b>not justified, effective</b> or <b>consistent with national policy</b> because the site provision is not adequately evidence based in terms of the pitch provision figure identified and does not represent the most appropriate strategy when considered against the alternatives.</p>	Recommend the Council to meet with site promoter to discuss Gypsy and Traveller pitch provision distribution in order to	<p>No change is sought to the Policies Map.</p> <p>No alternative suitable site(s) has/have been promoted so it is unclear what the reasonable alternatives would be.</p> <p><b>No change.</b></p>

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		<p>agree an appropriate site distribution schedule</p> <p>Amend para. 9.25 as follows:</p> <ul style="list-style-type: none"> <li>• Greater clarity be provided regarding the basis for the overall Gypsy and Traveller pitch requirement figure;</li> <li>• Reference to be included to timescales being agreed between the Council and developers regarding the provision of Gypsy and Traveller pitches as part of the delivery of housing allocations</li> </ul>	
633	<p><b>Ellenbrook Country Park</b></p> <p>Extent of the country park is not clearly stated on the Policies Map (or key diagram).</p>	<p>Ellenbrook Country park should be clearly shown on the Policies Map (and key diagram).</p>	<p>The Park lies in the Green Belt but during the life time of the Plan a large part of it will be subject to mineral extraction. <b>No change.</b></p>

### Policies Maps Sheet 3

PSPM no.	Main issues	Changes sought	WHBC comment
Full list of PSPM numbers below.	<p><b>The decision to reinstate the aerodrome site SDS1 (WGC4) is fully supported</b></p> <p>Reinstating the aerodrome would be a great asset to the Borough.</p>	The airfield must be included with priority over any housing.	<p>The Policies Map does not show an area for a runway.</p> <p>However, for clarification, Policy SP 18 states that in addition to 650 dwellings and other associated development, the Masterplan will allow the opportunity for a realigned grass runway on land to the north of the Green Belt boundary.</p> <p><b>No change.</b></p>
749	<p><b>No reason to build on site SDS1 (WGC4) open land</b></p> <p>The plan is <b>not consistent with national policy</b> because the needs of the community are not being protected which is one of the plan's objectives.</p>	Take out the Panshanger aerodrome site (SDS1/WGC4).	<p>The Panshanger Aerodrome site was safeguarded in the adopted District Plan 2005 for longer term development needs. It is now to be allocated for housing and associated development within the new Plan period. The community has been consulted throughout plan preparation.</p> <p><b>No change.</b></p>
587	<p><b>UOL 230 is not urban open land</b></p> <p>The plan is <b>not justified</b> or <b>effective</b> because UOL 230 is a former landfill site which closed in 1990, and is therefore contaminated.</p>	Map should be changed to specify UOL 230 is not open land and has a level of contamination.	Urban open land sites are assessed against a set of criteria to assess their value as open space. UOL 230 was one of 5 additional sites identified since the Local Plan Consultation 2015, due to its future

PSPM no.	Main issues	Changes sought	WHBC comment
			<p>importance as part of the essential green infrastructure for Strategic Development Sites.</p> <p>UOL 230 is a large area of open land, vital to green infrastructure In association with the Birchall Garden suburb proposal. It provides opportunities for wildlife habitats, improved connectivity and recreational use and the land also forms part of the Green Corridor project. <b>No change.</b></p>
752	<p>The proposed allocation of site SDS2 (WGC5) and joint working of Welwyn Hatfield Borough Council and East Hertfordshire District Council is <b>supported</b>.</p> <p>The plan is not <b>justified</b> because the Policies Map should be changed to reflect the unworked areas suitable for development at Strategic Development Site SDS2 (WGC5).</p>	<p>Amend Policies Map sheet 3 to reflect the accurate extent of the developable area at Strategic Development Site SDS2 (WGC5). Revised Policies Sheet 3 submitted.</p>	<p>The Policies Map needs to be amended to on the western boundary with Burnside as indicated in the representation to correctly reflect land ownership and as shown in the Strategy Diagram for the site on Figure 12 in the Local Plan</p> <p>The eastern boundary should remain unchanged as it represents a physical feature on the ground and is considered to form an appropriate boundary to the extent of development on the site.</p>

PSPM no.	Main issues	Changes sought	WHBC comment
			<b>Minor Modification to site boundary with Burnside to exclude land within the curtilage of Burnside.</b>
754	<p><b>WS197 is affected by approved development proposal and should not be allocated on the Policies Map</b></p> <p>Development has been approved on appeal, which affects part of this designation.</p>	Remove site WS197 from the proposals map as a wildlife site because it serves no purpose.	<p>WS197 was ratified in 2000 (58/054) planning permission was granted on appeal on 31 October 2013 for the construction of a B2/B8 unit with offices and car parking on a part of the wildlife site. Reserved matters were approved January 2017. However, the map does not reflect the unworked areas suitable for development at SDS2 (WGC5) and the wildlife site designation still applies.</p> <p><b>No change</b></p>
754	<p><b>UOL80 is affected by approved development proposals and the designation and should be amended</b></p> <p>Development has been approved on appeal, which affects part of this designation</p>		<p>Planning permission was granted on appeal on 31 October 2013 for the construction of a B2/B8 unit with offices and car parking. Whilst reserved matters were approved January 2017 the site remains open and the UOL designation still applies. The boundary of this UOL has been amended elsewhere</p>

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			to take account of development that has taken place. <b>No change.</b>
755	<p><b>2,550 new homes allocated on site SDS2 (WGC5) will totally overwhelm Essendon village</b></p> <p>The plan is <b>not justified</b> or <b>consistent with national policy</b> because significant housing development in small villages (e.g. Essendon) is contrary to national policy.</p>	Move the current northern boundary of Essendon southwards and eastwards to the A414.	<p>The settlement strategy and hierarchy within Policy SP 3 directs growth to the most sustainable locations. No sites are allocated for development within Essendon village. This representation appears to be suggesting that the Local Plan redraws the Parish boundary. This is not within the gift of the Local Planning Authority.</p> <p><b>No change.</b></p>

**Full list of PSPM numbers commenting on ‘The decision to reinstate the aerodrome site SDS1 (WGC4) is fully supported’:**

3-24, 27-30, 32, 33, 35-39, 41-82, 95-145, 147-150, 153-161, 167, 169- 178, 180- 193, 196- 211, 213- 218, 220- 235, 237- 287, 289- 318, 320- 478, 480- 549, 551-635, 637- 641, 643- 652, 654- 661, 663- 669, 671, 673- 690, 692- 696, 698 – 700, 702 – 710, 712, 714, 716, 717, 720- 724, 726- 730, 732- 749, 753- 755

## Policies Maps Sheet 4

PSPM no.	Main issues	Changes sought	WHBC comment
14	<p><b>Site HS35 (GTLAA01) is in an inappropriate location for gypsy and traveller provision</b></p> <p>The plan is <b>not positively prepared</b> because HS35 (GTLAA01) will suffer from noise from the railway, it is in a flood zone and has poor access.</p>	None stated.	<p>The council have considered physical and environmental constraints affecting sites in the HELAA 2016. Site HS35 (GTLAA01) The site is considered suitable, available and achievable. Table 14 of the plan sets out site specific matters to be addressed at planning application stage.</p> <p><b>No change.</b></p>
14	<p><b>The road leading to HS21 (BrP13) and HS23 (BrP14) on Golf Club Road is inadequate</b></p> <p>The plan is <b>not positively prepared</b> because Golf Club Road is inadequate as it leads to Chancellors School.</p> <p>The sites are adjacent to a wildlife site.</p>	None stated.	<p>The council have considered physical and environmental constraints affecting sites in the HELAA 2016. The Highways Authority has been consulted. The scale of development reflects the capacity and function of Golf Club Road and a limited amount of development can be accommodated. <b>No change.</b></p>
756	<p><b>Queenswood School should not be defined as a Major Developed Site.</b></p> <p>Plan is <b>not consistent with national policy</b> because Queenswood School is defined as a Major Developed Site (MDS) but there is no longer reference in the NPPF to MDS.</p>	The MDS boundaries should be deleted.	<p>Whilst the NPPF no longer refers to MDS in the Green Belt, it is considered appropriate to continue with the MDS approach set out in the adopted District Plan 2005. This applies to a limited number of large previously developed sites, where</p>

		<p>Alternatively, if the Council seeks to maintain MDS boundaries, the school would wish to review the MDS boundary to include all the land at the site which is previously developed.</p>	<p>development outside of the defined boundaries has the potential to impact on the openness of the Green Belt and the purposes of including land within it.</p> <p>In accordance with para. 72 of the NPPF, WHBC will work in partnership with schools to accommodate their need to expand or alter.</p> <p>The current MDS boundary remains appropriate.</p> <p><b>No change.</b></p>
759	<p><b>Waste sites New Barnfield and Roehyde should be removed from the Green Belt.</b></p> <p>Plan is <b>not positively prepared, effective or consistent with national policy</b> because the plan does not complement the Waste Local Plan/Waste Site Allocations document in bringing about a facilitatory environment for delivery of the objectively assessed waste needs of Hertfordshire.</p>	<p>Remove New Barnfield and RoeHyde waste sites (identified within the Waste Site Allocations document) from the Green Belt.</p> <p>Removal of land from the Green Belt on the Policies Map.</p> <p>Deletion of New Barnfield as a Major</p>	<p>The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances.</p> <p>In his report on the examination of the Waste Site Allocations document, the Inspector held that exceptional circumstances <b>may</b> exist to justify the removal of sites from the Green Belt for development for waste purposes only.</p> <p>This site is split between the administrative areas of Welwyn Hatfield and St Albans CDC. It has a long list of potential waste uses but none have come forward. There is further uncertainty as the County Council</p>

		Developed site on the Policies Map.	<p>have announced a review of the Waste Local Plan and it is unclear if the site will still be required for waste management purposes. The Council therefore consider that there are no exceptional circumstances to warrant the release of this site from the Green Belt at the current time. The allocation is shown on the Policies Map.</p> <p>County Waste Site Allocations are shown on the Policies Map, for information, as this allows the full extent of policy coverage to be shown.</p> <p><b>No change.</b></p>
731	The allocation of Sites HS22 (BrP4) and HS24 (BrP7) for housing is <b>supported</b> .	None stated.	Noted.
731	<p><b>The HS24 (BrP7) site boundary will not deliver the most appropriate form of development</b></p> <p>Plan is <b>not positively prepared, justified or consistent with national policy</b> because the boundary for site HS24 (BrP7) would not deliver the most appropriate form of development. An alternative boundary would ensure at least 100 homes could be delivered with open space and access from Hawkshead Road.</p>	The boundary of site HS24 should be adjusted.	<p>The boundary of HS24 (BrP7) was amended following the Local Plan consultation in 2015 to reduce the developable area to maintain separation between Little Heath and Swanley Bar. The gap between these two settlements is very narrow.</p> <p>The boundary proposed in the representation would reduce the already narrow gap between the two settlements. An alternative point of access is not, in the view of the Highway Authority, essential to facilitate development of this site. Should the developer wish to secure alternative access, this would need to be considered</p>

			at the planning application stage. <b>No change.</b>
731	<p><b>Allocate BrP6 for housing</b></p> <p>Site BrP6 should be allocated as it is capable of helping to address housing needs in the Borough.</p>	None stated.	<p>BrP6 was not selected for allocation because on balance, the significant adverse impact on the purposes of the Green belt was considered to outweigh the benefits of the site.</p> <p>Development of the site would significantly physically and visually shorten the fragile gap between Brookmans Park and Potters Bar. This outweighs the benefits of the site.</p> <p><b>No change.</b></p>
14, 715	<p><b>General/irrelevant Comments</b></p> <p>Local plan contravenes national policy regarding protected green belt land. Brownfield land should be delivered first.</p> <p>Plan is <b>not positively prepared</b> because there has been no provision for the necessary infrastructure to support development</p>	None stated.	<b>No change</b>

## Policies Maps Sheet 5

PSPM no.	Main issues	Changes sought	WHBC comment
31	<b>Site HS29 should larger</b>	Amend boundary of site HS29 to enlarge size of site allocated.	The proposed boundary is straight and logical. Change requested would result in weaker, less logical new green belt boundary. <b>No change.</b>
750	<b>It is unclear what area of WS183 is protected</b> The designation has changed from covering a specific area to a 'point'	Amend the Policies Map to make this clear.	The process for assessing and designating (or de-designating) Local Wildlife Sites is undertaken periodically by the Herts and Middlesex Wildlife Trust. The new Policies Maps therefore reflect changes since 2005. Wildlife sites that are identified as a point, rather than a defined area, act as a "flag" of wildlife importance in the vicinity, where the area of that interest cannot be accurately defined. <b>No change.</b>

### Inset Map 26 New Barnfield Resources Centre

PSPM no.	Main issue	Changes sought	WHBC comment
760	<p><b>New Barnfield Resources Centre should be removed from the Green Belt</b></p> <p>Hertfordshire County Council is seeking the removal of New Barnfield from the Green Belt through the Local Plan process.</p>	<p>Removal of New Barnfield from the Green Belt and deletion of it as a Major Developed Site (MDS) in the green belt.</p>	<p>The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances.</p> <p>In his report on the examination of the Waste Site Allocations document the Inspector held that exceptional circumstances may exist to justify the removal of the New Barnfield site from the Green Belt for development <b>for waste purposes only</b>. There is however no requirement on WHBC to do so. Since that time the planning application for the waste management facility has been refused and no other proposals have come forward and the County Council has commenced a review of the Waste Local Plan. In the circumstances it would not be appropriate to remove the New Barnfield site from the Green Belt at this time.</p> <p>As it is not proposed to amend the Green Belt boundary to remove New Barnfield, it is not appropriate to delete the MDS status of the smaller area within the New Barnfield site.</p> <p>Waste Site Allocations are shown on the Policies Map, for information, as this allows the full extent of policy coverage to be shown. <b>No change.</b></p>

### Inset Map 27 Queenswood School

PSPM no.	Main issue	Changes sought	WHBC comment
756, 757 (also dlpps1980)	<p><b>The Major Developed Site designation should be removed from Queenswood school.</b></p> <p>There is no longer any reference to Major Developed Sites in national policy. The tightly drawn boundary of the MDS restricts the ability of the school to develop educational facilities.</p> <p>If the MDS is retained, then it should include all of the previously developed land on the site.</p>	<p>The MDS boundaries should be deleted from Inset sheet 27 and Policies Map 4.</p> <p>If MDS status is retained, then the MDS boundary at Queenswood School should be redrawn wider, to include all the tennis courts, the cottages, Stable Mews and South Lodge</p>	<p>The retention of designated MDS provides continuity of the policy approach to development in the Green Belt on previously developed land and is in accordance with paragraph 89 of the NPPF.</p> <p>The current MDS boundary, drawn around the central group of buildings on the site remains appropriate. It would not be appropriate to widen the area designated as MDS to include all of the previously developed land on the site, such as the tennis courts and other buildings as these are widely dispersed across the whole site, and the extension of the MDS to include them may harm the openness of the Green Belt. On land outside the MDS the approach to previously developed land set out in the Policy would apply.</p> <p><b>No change.</b></p>