

WELWYN HATFIELD BOROUGH COUNCIL  
 CABINET PLANNING & PARKING PANEL – 17 NOVEMBER 2020  
 REPORT OF THE CORPORATE DIRECTOR (PUBLIC PROTECTION, PLANNING AND GOVERNANCE)

LOCAL PLAN – OBJECTIVE ASSESSMENT OF NEED AND FINAL SITE SELECTION

APPENDIX B SUMMARY OF RESPONSES TO THE SUSTAINABILITY APPRAISAL ADDENDUM

<b>Sustainability Appraisal</b>	
Do you consider that the Addendum to the Sustainability Appraisal 2020 to be legally compliant for this stage of the Local Plan making process?	
Number of Respondents: 20	10% legally compliant (2)
	35% not legally compliant (7)
	55% did not indicate (11)

**General comments on the Sustainability Appraisal**

Section	Comment ref	Main Issue	Changes Sought	Response
N/A	Pc17	Possible error noted in SA are: (1) SA refers to Sites HS13 with Hat19 (Scenario 1), even though these nowhere near each other. Hat19 has not been identified as a site. (2) Table 4 (P20) refers to land west of Bramble way (road) which does not exist Bramble Road (Hat 19) is off St Albans Road West, HS13 is the other side of the A1M. (3) No mention of HS13 on its own with descriptions of the site..	Correct the error.	Noted. 'HS13' should be considered deleted.
	Pc332	Meeting the OAN		The SA recognises that the OAN is around 16,000 homes. Paragraph 6.8 of the SA

		SA assumes the Council is meeting the OAN, however the proposal it is promoting falls short.		states 'Whilst the proposed amendments will deliver a substantial amount of housing, this will fall short of the housing need by around 2,000 homes.'
	Pc341	Consultation on SAs. Herts and Middlesex Wildlife Trust and the Green Corridor Group were not consulted during the preparation of the update of the SA.		The consultation to which the Group has responded represents their opportunity to comment on this document.
	Pc369	Disproportionate growth. Option 5 is not considered the most appropriate strategy in line with NPPF (para 182). It would be more appropriate to progress option 1 (.i.e. achieves higher SA scores) More development than is proportionate directed to the towns (88%) and less to the villages (10%)		Noted.
	Pc591	SA is not objective. The effectiveness and impartiality of the strategic growth options set out in the SA are undermined, as this document was not published until after the Council had already made a decision on which option to pursue (at the Cabinet Planning and Parking Panel' Meeting on 29th January 2020). Thus, the SA does not represent an objective assessment of the options, thus making it an effective part of the evidence base.	A new objectively based Sustainability Assessment is required, which will justify and support how the Local Plan is able to achieve the OAN housing growth forecast during the plan period	The Feb 2020 version assesses the new preferred option put forward by members in late January 2020. The 'new' option was not communicated to LUC or Council officers in advance of this. The SA objectively assesses the option proposed, along with reasonable alternatives. The preferred option assessed in the January version constitutes Option 1 of the Strategic Growth Options. Assessments of individual sites have not changed since the January version.
	Pc655	The reasons for the rejection of alternatives is not given, nor is it found within the Council's site selection process. This was the primary ground for the challenge in Forest Heath, as the Core Strategy and SA/SEA failed to explain what reasonable alternatives to the proposed policies/sites had been considered and why they had been rejected		Reasons for the selection of the preferred strategic option, and rejection of alternative options, are provided at p.33-34 in Ch.5 of the SA Addendum (Feb 2020).

	Pc595	<p>Methodology.</p> <p>Considerably more weight should be given to proposals which can have credible potential to secure commuting to the main centres by modes other than the private car. This means walkable connection to the train network. Significant positive (i.e. Objectives 4.2 and 4.3) should only be applicable for proximity to train stations or to bus stops serving routes with higher frequency 6 day services. This will enable a move from the private car to promote non-car modes.</p> <p>Disagree with the methodology for the assessment of sites against objective 4.5 that scores sites that are within 250m -1KM of a heritage assets as minor negative. This incorrectly implies that sites within 250m is adjacent to heritage asset and should have a significant negative score.</p> <p>The methodology assumes the rating for designated Areas of Archaeological Significance (AAS) should be minor negative. This is incorrect as it ignores the instances when AAS can render a site effectively undeliverable. Hence the appropriate conclusion should be significant negative uncertain</p>	<p>Give more weight to sites that have a credible potential to secure commuting to the main centres by sustainable modes.</p> <p>Amend thresholds of objective 4.5 to states “not adjacent but no more than 1000m from a heritage asset”.</p> <p>Amend score to significant negative uncertain</p>	<p>Noted. The SA scoring is in line with the Assumptions set out in Appendix A, which considers locations that have greatest access to public transport to have a significant positive effect.</p> <p>Noted. Sites within 250m of a heritage asset were considered on the same basis as those adjacent to one. The assumptions should be considered to read 'A significant negative effect (--?) may occur where the development location is within 250m of or includes a designated heritage asset...'</p> <p>The assumptions with regards to AAS are considered proportionate, given the uncertainty regarding the nature of these assets. Deliverability is a planning matter, not an SA matter.</p> <p>The SA assesses site allocations as communicated to LUC by the Council. It</p>
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		In regards to objective 4.6 (Biodiversity) a “significant negative” is applied where a proposal either includes or is adjacent to a designated asset. Suggest this should also have reference to proposals which would require off-site works which would directly impact upon a designated asset.	Significant negative score for objective 4.6 should also apply to sites that would require offsite works that could directly impact designated assets.	does not make any assumptions regarding off-site works. These should be addressed through plan policies if allocated or through the development management process
	Pc598	Methodology. The addendum perpetuates the inadequacies of the sustainability methodology previously commented on. It is totally unfit for purpose as it fails to provide a tool to distinguish more or less sustainable sites. The use of the double positive and double negative scoring is without logic, and the assessments defy reason in many instances.	Council should review its process.	The SA methodology was established at the start of the SA process and was consulted on in the early stages of SA. It has been applied consistently throughout the process, with the exception of minor updates to ensure it is up to date, e.g. to reflect updated evidence documents. The methodology is in line with the requirements of the SEA Regulations and best practice.
	Pc655 & Pc656	SA Process. The SA should not be a post-fact justification of the decision-making process but an integral part of that process. The consultation version of the Sustainability Appraisal Addendum (Feb 2020) differs from the version presented to Members on 23 January 2020. Para 5.14 rejects the application of a higher windfall assumption to options 1 to 4. Hence, option 5 cannot be considered a reasonable alternative for Plan making, as it is difficult to assess impact of windfalls (e.g. affordable housing). Reasons for choosing Option 5 are not documented as part of assessing the plan’s strategic priorities and how these might be		The Feb 2020 SA Addendum assesses the new preferred option put forward by members in late January 2020. The preferred option assessed in the January version constitutes Option 1 of the Strategic Growth Options. Assessments of individual sites have not changed since the January version of the SA Addendum

		delivered. This is a requirement of legislation for Sustainability Appraisal. Specifically, it is a requirement that all reasonable alternatives tested are realistic and deliverable		
	Pc749	Health Inequalities. Although the Sustainability Appraisal considers health, it fails to consider health inequalities or the full spectrum of wider determinants of health.	Health Impact assessment should be required for developments over 100 homes (or for cumulative totals of smaller sites, if appropriate).	The SA methodology was established at the start of the SA process and was consulted on in the early stages of SA. Health Impact Assessment is outside the scope of the SA.
	Pc361	Support the change in the SA score of site HS11 (HAT11) against objective 4.4 (Retaining local distinctiveness) from significant negative (2016) to minor; as it is justified.	Site should still be allocated.	Noted.
	741	Without a thorough review of settlement capacity, the Sustainability Appraisal cannot reach an evidenced conclusions on the sustainability of the Council's choices.  Paragraph 5.8 of the 2020 SA update states that, "The housing target is intrinsically linked to the settlement strategy." The settlement strategy is a peripheral to this exercise as it is the weighting of Green Belt harm which is leading the distribution of development	Assess the sustainability of larger villages to accommodate a greater proportion of the Objectively Assessed Need	The sustainability of larger villages was considered by the Council, reported in the Housing Sites Selection Background Paper 2016, and informed the settlement hierarchy and strategy of the Proposed Submission Local Plan (Policy SP3). The SA considered proposals and policies against sustainability criteria. The settlement strategy and the distribution of development, including the proportion directed to larger villages, is considered at paras. 5.35 – 5.48 of the SA Addendum. The statement at paragraph 5.8 of the 2020 SA Addendum refers to the fact that the number of homes to be delivers varies between the settlement strategy options assessed.
	595	<b>Strategic Options for Growth</b>		In the high level appraisal of the five Strategic Growth Options, the SA scores are explained in the commentary provided.

		<p>Suggests amendments to scoring for the growth options against SA objectives, as outlined below:</p> <ol style="list-style-type: none"> <li>(1) The score of option 1 against objective 5.1 (Housing) should be a minor positive and not a significant positive. This is due to the fact that 88% of housing growth will be at the main towns; and would be less likely to meet the future needs of villages and support the vitality and viability of rural communities.</li> <li>(2) The score option 4 against objective 6.4 (sustain rural communities) should be amended to ++/? (from ++/-). Reason provided is that Site WE100 (Woolmer Green) should be retained within an employment use and not released , as this will reduce the housing/employment imbalance of this option</li> <li>(3) Score of Option 4 against objective 6.1 (Employment) should be amended to ++? (from +?) due to the above reason</li> </ol> <p>The SA indicates option 4 is likely to result in generally positive effects, whilst the outcome from Option 5 is simply uncertain (Para 5.21-5.22)</p> <p>Options 1-4 are better understood, with outcomes pertaining to Option 5 more uncertain through the SA Addendum. Hence, Option 5 proposed via this consultation is not based in evidence and does not constitute a well-considered and positively prepared approach to Plan making.</p>		<p>(1) Option 1 would include a number of housing sites in and around the larger villages. In Option 5 less development is proposed in and around the villages, and 88% of development would be directed to the main towns. Option 1 scores higher than Option 5 in relation to SA objectives 5.1 and 6.4.</p> <p>(2&amp;3) The Options were appraised as described at para. 5.12 of the SA Addendum (Feb 2020).</p>
	Pc655	<p>If the growth being met via specific site options in a reduced growth scenario toward meeting OAN is obscured (i.e. windfall) by other contribution towards supply, the reasons for this must be explained as the mode and process of delivery is potentially changed. This must be reflected in the assessment of relevant sustainability objectives</p>		<p>The SA of additional and amended sites has been carried out consistently with previous rounds of appraisal in relation to consideration of the contribution each site would make (in %) towards the OAN, and in line with the appraisal criteria (SA Addendum Appendix A). The contribution of windfall to the Strategic Growth Options</p>

		but does not form part of this SA's assessment framework in this case		was reported in the SA Addendum, and the implications for SA scores for objective 5.1 was explained (para. 5.15; footnote 13, Ch.5).
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## Appraisal Matrices

### Welwyn Garden City

#### Site WGC5

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 1.1 & 1.2	Pc341 & Pc651	Objectives 1.1 and 1.2 fail to consider health risks of those living close to contaminated former land fill site.	Remove Site WGC5  Consider evidence provided by Green Corridor group et al at hearings. Consult stakeholder/ experts like Herts Middlesex Wildlife Trust	The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum. Contamination is taken into account if the site itself is known to be contaminated. The SA is a strategic assessment and therefore does not consider suitability of ground and soil conditions for vegetable growing.
Objective 2.2		Score of objective 2.2 is incorrect, as development will increase flood risks downstream in Hertford due to building on land where flood water is retained, near a tributary that feeds onto River Lea	Assess feasibility, effectiveness and cost of mitigations measures. If this is not possible allow buffers for specific assets that will be impacted (based on evidence submitted)	All objectives, including those relating to flood risk, greenhouse gas emissions, air pollution, open space, landscape character and historic environment, have been assessed in line with the Assumptions, which have been applied consistently throughout the SA process. Note that SA objective 4.2 considers whether a site is within walking distance of an employment area, whereas 6.1 considers whether the site itself is located within an employment area.
Objective 4.2, 4.3 & 6.1		Significant positive score is not justified for objectives 4.2 4.3 (and inconsistent with objective 6.1), as bus services do not run after around 8pm or on Sundays and road are not safe for cycling for children. This site will increase car use.	Reduce scale of development, to take account of constraints and buffers	The Assumptions that the scores are based on consider whether bus services run 6 days per week, not if they run into the evening or on Sundays.



Objective 4.4	Incorrect scoring for objective 4.4 (open space), as site is a large area of open grassland and clarity needed on open space term. This should be minor negative. Objective 4.4 (landscape character) fails to comply with Historic England guidance to identify and preserve local character, including view. Development would have a significant adverse impact on views and setting of heritage assets. The score should be significant negative		Open space refers to the planning term, i.e. publicly accessible open space. The types of space included in this objective are set out in the Assumptions in Appendix A of the SA Addendum.
Objective 4.5	Objective 4.5 fails to take account of evidence submitted by various stakeholders at hearings. Due to these and above, the score of uncertain significant negative are unjustified.		Uncertainty is recorded with regards to effects on historic assets to recognise that effects on heritage depend on more than just proximity, but other suitable data was not available on a borough-wide basis to inform the SA.
Objective 4.6	Uncertain Score of Objective 4.6 is unjustified. It fails to refer to submissions from the Green Corridor Group, regarding scale, nature and significance of ecological assets on or adjacent to the site.		The assessment of ecological assets is undertaken via SA objective 4.6, in line with the Assumptions presented in Appendix A of the SA Addendum. Detailed ecological studies are not available on a consistent basis for all sites and are outside the scope of SA. The SA methodology is considered proportionate, in line with the PPG.
Objective 4.8	Objective 4.8 fails to take account of doubts about the effectiveness of SUDS due to concerns about contamination risks to water resources from the former landfill site nearby and implications for viability. Further, it should take account of managing increased sewerage.	Assess the effectiveness of SUDS and related contamination issues of landfill sites (Objective 4.8)	Mitigation measures, such as SUDS, have not influenced the SA assessments and scoring. As noted in the Assumptions in Appendix A, 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, in line with the Water Cycle Study.
Objective 5.1	Objective 5.1 cost of mitigations raise viability issues and uncertainties in relation to whether the site can deliver 1300 homes.		Viability is a planning consideration, not a sustainability/SA consideration.

**Site WGC4a**

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.2 & Objective 4.3	Pc595	The score of site WGC4a against objectives 4.2 (reduce CO2 from transport) and 4.3 (reduce air pollution from transport) should be downgraded, as this is located within proximity to low frequency bus services.	Amend scores of Site WGC4a against objectives 4.2 and 4.3 from significant positive to minor positive	The site is within 400m of bus stops on Lysander Way, which are served by a 6 day a week service. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.
	<i>Pc595</i>	WGC4a has been added to the existing draft allocation despite the land recently being committed for biodiversity offsetting in a permission for the WGC4 site. Therefore it is undeliverable.		Regarding Site WGC4a the Council has confirmed that the number of dwellings (and the location of the green belt boundary indicated in the consultation document) has been designed to avoid development of the agreed biodiversity offsetting land.

**Site WGC11**

Section	Comment ref	Main Issue	Changes Sought	
N/A	Pc595	SA only assess sites that fall into options and 1 and 4, thereby including the deemed preferred option 5. Highly sustainable sites have been sifted out based on deemed harm. E.g. WGC11 that they have SA'ed using LUC methodology. This is very sustainably located, and the only issue previously flagged was the effect upon the setting of heritage assets. This has been shown through direct dialogue with Historic England to be capable of mitigation and could (through planning obligations) result in net positive effects on matters pertaining to heritage considerations.	Site WGC11 should be allocated	<p>The SA only considered sites that the Council consider to be reasonable alternatives. WGC11 is not considered a reasonable alternative as it fails Stage 2 HELAA tests.</p> <p>The SA does not take into account mitigation as this allows all sites to be assessed on a comparable basis, on their own merits.</p>

## Hatfield

### Site Hat20/21

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 1.1 and 1.2	Pc744	Inconsistencies in the assessment of sites Hat20/21 and Hat11 against objectives 1.1 and 1.2. Unclear why the latter achieved a score of minor positive and former a negligible score. The barrier to access noted for site Hat20/21, equally applies to Hat11 and can be remediated	Amend score to minor positive	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. Note the different assumptions for housing and employment sites. The reasons for SA scores are provided within the matrices for each site appraisal. The SA does not take into account mitigation as this allows all sites to be assessed on a comparable basis, on their own merits.
Objective 4.2	Pc744	Unclear why Site Hat11 (Significant positive) and Hat20/21 (Minor positive) achieved different scorings against this objective 4.2. Due to reasons above, this score should be increased.	Amend score to Significant positive	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. Note the different assumptions for housing and employment sites. The reasons for SA scores are provided within the matrices for each site appraisal. The SA does not take into account mitigation as this allows all sites to be assessed on a comparable basis, on their own merits.
Objective 4.4	Pc744	The score of Hat20/21 against objective 4.4 (landscape character) should be amended to negligible (0) from uncertain (?), as Site Hat11 (close by to the north) is proposed to be allocated for housing, which will minimise the effect of the landscape character of the land to the south	Amend score to negligible (0)	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. The SA matrices assess each site on its own merits in order to allow all sites to be compared as reasonable alternatives.
Objective 4.4	Pc744	The score of Hat20/21 against objective 4.4 (previously developed land) should be amended to a minor positive, as the northern part is currently a park and ride (Hat21) and is being promoted for employment use as a science park.	Amend score to minor positive	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. The Site proposal for Hat20 did not include the park and ride site.

				Site Hat21 failed stage 1 of 2019 HELAA process as it was not promoted for new housing, employment development and fell outside of the remit of this. Therefore, it was not considered to be a reasonable alternative and subject to a SA.
<i>Objective 4.6</i>	<i>Pc744</i>	The score of Hat20/21 against objective 4.6 (previously developed land) should be amended to a minor negative. Reasons are the park and ride to the north (Hat21) will be moved onto the southern part, which will reduce the impact on Tollgate Wood Local Wildlife Site.	Amend score to minor negative	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.  Hat20 did not include the park and ride site.
<i>Objective 4.10</i>	<i>Pc744</i>	The score of Site Hat 20/21 against objective 4.10 (productive agricultural land and PDL) should be amended from significant negative to mixed minor positive/negative. Reasons are the northern part of the site is PDL and the southern part is grade 2 agricultural land.	Amend score to minor positive/negative	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.  Hat20 did not include the park and ride site.
<i>Objective 6.6</i>	<i>Pc744</i>	The score of Site Hat20/21 against objective 6.6 (learning and skills) should be amended to significant positive (from N/A) as it may include the potential provision of a new science park, which can contribute towards lifelong learning within the local community.	Amend score to significant positive	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.

## Potters Bar

### Site PB1

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 1.1	Pc138 Pc124	Site PB1 is not within a straight line walking distance of community facilities within Northaw Village, as these are not realistically accessible by foot (.i.e. narrow, unlit, tree lined muddy footpath/bridleways) and wheel user friendly (Objective 1.1) . None of the facilities are realistically accessible on foot from PB1.	Remove PB1	Noted.  Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. Reasons for scores are provided within the SA matrix.
Objective 4.2 and 4.3	pc411	Question the significant positive scoring of site PB1 against objectives 4.2 and 4.3 that indicates it would minimise greenhouse gases and air pollution as it is near transport services and within walking distance of Potters Bar town centre. No information provided to clarify how access into Potters Bar town centre would be achieved.	Review the relevant effects in light of there being no means of access into Potters bar from the site.	Walking distances have been applied in line with the assumptions in Appendix A of the SA addendum (i.e. measured in a straight line from the edge of the site). This has been applied across all site appraisals throughout the SA to ensure sites are assessed on a consistent basis.  There are bus stops on the northern boundary of the site, near Woodgate Avenue and the site is within 400m of bus stops within Potters Bar.
Objective 4.6	pc124	Site PB1 achieves a significant negative score against objective 4.6 (biodiversity), as it located adjacent to and close to Local Wildlife Site. A significant green buffer is needed to protect wildlife from noise, light pollution.	Revert to Option 1 (16k) that excluded PB1. Mitigate noise/air vehicular pollution from M25 & PB1, and consider effects on biodiversity.	The SA takes into account the presence of Five Acre Wood and other local wildlife sites.

## Woolmer Green

### Site WGr1

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.4	Pc667	Disagree with the change of score for site WGr1 against Objective 4.4 (Landscape character and local distinctiveness) that changed from minor negative uncertain to significant negative uncertain (x 2). Key reasons are the GBR3 Study provides a broad overview of landscape sensitivity of wider landscape areas and should not be directly applied to test the appropriateness of individual areas. Further, a landscape buffer is proposed on the northern boundary. SA objective 4.4 should take this into account when assessing likely effects, as this will result in a positive effect against local distinctiveness and landscape character (.i.e. defined edge to settlement and ensuring gap between settlements).	No changes specified	<p>The new score reflects the updated Green Belt Study. The Study is the best data available on a consistent basis across the Borough and is therefore considered a suitable proxy.</p> <p>The SA does not take into account mitigation as this allows all sites to be assessed on a comparable basis, on their own merits.</p> <p>Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.</p>
Objective 5.1		Disagree with the change of score for WGr1 against objective 5.1 (amount housing) from minor positive to negligible (0), as any contribution of housing should be positive, as council has consistently under delivered housing.		

**Site WGr7**

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.6	Pc595	The SA by error indicates that Site WGr7 partly falls within a Local Wildlife Site and Local Nature Reserve. Due to this, the score of this against objective 4.6 (biodiversity) needs correcting.	Amend score of Site WGr7 against Objective 4.6 from significant negative (- -) to uncertain significant negative effect (- -?)	According to GIS data held by LUC, the site contains part of the LWS, but the reference to it including the LNR was an error. We have since been advised that the LWS boundary should follow that of the LNR, therefore the score should be considered updated to significant negative uncertain (--?) as suggested.

## Oaklands & Mardley Heath

### Site *OMH7* and *OMH9*

Section	Comment ref	Main Issue	Changes Sought	
Objective 4.4	Pc237	Disagree with the minor negative score of this site against objective 4.4 (Retaining local distinctiveness) as the development of sites <i>OMH9</i> and <i>OMH7</i> would significantly expand Oaklands towards Welwyn and erode the gap.		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 5.1		How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		
Objective 6.6		Disagree with the uncertain minor positive score of site <i>OMH9</i> against objective 6.6 (access to learning, training and skills development), as this is only within walking distance of one primary school. Access to another primary school, secondary sixth form college or higher education site would require either cycling on dangerous traffic roads or use of bus/car.		



## Welwyn

### Site Wel1

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.2	Pc789	Disagree with the significant positive score of site Wel1 against objective 4.2 (reduction in CO2 from transport). This site is not within 400m of bus stop providing a 6 day a week service. Text relating to this has been copied by error from Wel6, 15 (.i.e. bus stops on Codicote Rd) or is referring to ad hoc bus stops in the Hawbush area of village that provide 3 day a week shopping service to Welwyn Garden City. There are no physical bus stops in this location, whilst the roads are not wide enough for a bus.	Consider errors in scoring of Site Wel1 against objective 4.2	According to the GIS data, the site is within bus stops served by a six day a week service on Codicote Road and Church Street. The GIS data also shows stops served by a six day a week service on Wilga Road and Wilshere road but it is acknowledged this is no longer correct. However, this does not affect the scoring.
Objective 5.1	Pc237	How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 6.6	Pc789	Site Wel1 is within a 1400m walking distance of Welwyn St Mary's Primary School, which is not an educational establishment providing access to training, skills development or lifelong learning (Objective 6.6).	Consider errors in scoring of Site Wel1 against objective 6.6	The site is within 1,400m of St Mary's CE Primary School, Knightsfield School (specialist school for hearing impaired), Monks Walk School secondary school and Sherrardswood Independent School.
Objectives 4.2 & 4.3	Pc595 Pc237	The score of site WEL1 against objectives 4.2 (reduce CO2 from transport) and 4.3 (reduce air pollution from transport) should be downgraded, as this is located within proximity to low frequency bus services.	Amend scores of Site WEL1 against objectives 4.2 and 4.3 from significant positive to minor positive	According to the GIS data, the site is within bus stops served by a six day a week service on Codicote Road and Church Street. The GIS data also shows stops served by a six day a week service on Wilga Road and Wilshere road but it is acknowledged this is no longer correct. However, this does not affect the scoring.

## Site Wel2

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.2	Pc789 Pc237	Disagree with the significant positive score of site Wel2 against objective 4.2 (reduction in CO2 from transport). This site is not within 400m of bus stop providing a 6 day a week service. Text relating to this has been copied by error from Wel6, 15 (.i.e. bus stops on Codicote Rd) or is referring to ad hoc bus stops in the Hawbush area of village that provide 3 day a week shopping service to Welwyn Garden City. There are no physical bus stops in this location, whilst roads are not wide enough for a bus.	Consider errors in scoring of Site Wel2 against objective 4.2	According to the GIS data, the site is within 400m of bus stops served by a six day a week service on the B656, Codicote Road and Church Street.
Objectives 4.2 & 4.3  Objective 6.6	Pc595  Pc 595 Pc237	The score of site WEL2 against objectives 4.2 (reduce CO2 from transport) and 4.3 (reduce air pollution from transport) should be downgraded, as this is located within proximity to low frequency bus services.  Site Wel2 is within a 1400m walking distance of Welwyn St Mary's Primary School, which is not an educational establishment providing access to training, skills development or lifelong learning (Objectives 6.6).	Amend scores of Site Wel2 against objectives 4.2 and 4.3 from significant positive to minor positive.  Consider errors in scoring of Site Wel2 against objective 6.6	According to the GIS data, the site is within 400m of bus stops served by a six day a week service on the B656, Codicote Road and Church Street.  The site is within 1,400m of St Mary's CE Primary School, Knightsfield School (specialist school for hearing impaired), Monks Walk School secondary school and Sherrardswood Independent School.
Objective 5.1	Pc237	How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.

### Site Wel3

Section	Comment ref	Main Issue	Changes Sought	Response
Objectives 4.2 & 4.3	Pc237	Assessment of site Wel3 against objectives 4.3 and 4.2 by error states this is close to transport services. It is at the end of a feeder road from the village centre and the only bus service is a two way shopping services three days a week along some roads 250m away		The GIS data shows stops served by a six day a week service on Wilga Road and Wilshere Road but it is acknowledged this is no longer correct. Score should be amended to negligible (0).
Objective 5.1		How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 6.6		The significant positive effects are misleading as this is beyond 0.5m walking distance of a primary school, the secondary school is within 1m of this (WGC) and college facilities are further away		

## Site Wel6

Section	Comment ref	Main Issue	Changes Sought	Response
Objectives 4.2 & 4.3	Pc595	The score of site Wel6 against objectives 4.2 (reduce CO2 from transport) and 4.3 (reduce air pollution from transport) should be downgraded, as this is located within proximity to low frequency bus services.	Amend score of Site Wel6 against; Objective 4.2 from significant positive to minor positive. Objective 4.3 from significant positive to minor positive.	Buses within 400m of the site run six days a week, including the Arriva 301 service. Frequency of services on those six days is not taken into account in the SA. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 5.1	Pc237	How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 6.6	Pc237	Disagree with the significant positive score for site Wel6 against objective 6.6 (access to learning, training and skills development), as this is beyond 0.5m walking distance of a primary school, the secondary school (WGC) and college facilities are further away		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 4.5	Pc788	The assessment of this objective by error indicates that Site Wel6 is between 250m-1000m of Welwyn Conservation Area (300m+), Dicket Mead Roman Villa Scheduled Monument (1KM+) and Lockleys Roman Villa (1KM+). These assets are unlikely to be impacted by the site.		Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. Reasons for scores are provided within the SA matrix. According to our GIS information, Welwyn Conservation Area lies just under 300m from the site. Dicket Mead is around 950m from the site and Lockleys is around 1km from the site.

### Site Wel14

Section	Comment ref	Main Issue	Changes Sought	
Objective 5.1	Pc237	How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 6.6	Pc237	Disagree with the significant positive score for site Wel14 against objective 6.6 (access to learning, training and skills development), as this is beyond 0.5m walking distance of a primary school, the secondary school is within 1m of this (WGC) and college facilities are further away		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.

### Site Wel14b

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.4	Pc237	Disagree with the minor uncertain negative score for this site against objective 4.4 (Landscape character) and a minor negative against objective 4.4 (local distinctiveness), as it would result in the loss of a large open area to housing development.		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 5.1		How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		

Objective 6.6		Disagree with the significant positive score for site against objective 6.6 (access to learning, training and skills development), as this is beyond 0.5m walking distance of a primary school, the secondary school is within 1m of this (WGC) and college facilities are further away		
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### Site Wel15

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 6.6	Pc789	Site Wel15 is within a 1400m walking distance of Welwyn St Mary's Primary School, which is not an educational establishment providing access to training, skills development or lifelong learning (Objective 6.6).	Consider errors in scoring of Site Wel15 against objective 6.6	The site is within 1,400m of St Mary's CE Primary School, Knightsfield School (specialist school for hearing impaired), Monks Walk School secondary school and Sherrardswood Independent School.
Objective 4.5	Pc789	Text of Objective 4.5 fails to mention the major archaeological significance of this site. Hertfordshire County Council's experts and the professional archaeological community agree that this location is the likely heart of the original Roman and pre-Roman (Iron Age) settlement. The Site Selection assessment makes no mention of this very significant factor against development of Wel15.	Errors and omissions should be recorded and fully considered if the sites are ever brought forward again for development consideration.	The SA recognises that the site is within an Area of Archaeological Significance. AAS' were used to inform assessment of archaeology as this data is consistently available across the borough, allowing all sites to be assessed in the same level of detail. The potential presence of archaeological features does not effect the SA's assessment of landscape character. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.

Objectives 4.2 & 4.3	Pc595 Pc237	The score of site WEL15 against objectives 4.2 (reduce CO2 from transport) and 4.3 (reduce air pollution from transport) should be downgraded, as this is located within proximity to low frequency bus services.	Amend scores of Site Wel15 against objectives 4.2 and 4.3 from significant positive to minor positive	Buses within 400m of the site run six days a week, including the Arriva 301 service. Frequency of services on those six days is not taken into account in the SA. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 4.5	Pc595	Site Wel15 is entirely within a designated Area of Archaeological Significance (AAS7). Indicate that there is a flaw in the SA methodology in relation to AAS, as it implies that proposals relating to a designated AAS should be identified with a "minor negative" (objective 4.5). Archaeological finds can render a site effectively undeliverable- the conclusion should be "significant negative uncertain".	Update the accompanying relating to AAS	The SA recognises that the site is within an Area of Archaeological Significance. AAS' were used to inform assessment of archaeology as this data is consistently available across the borough, allowing all sites to be assessed in the same level of detail. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 5.1	Pc237	How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 6.6	Pc237	Disagree with the significant positive score for site Wel15 against objective 6.6 (access to learning, training and skills development), as this is beyond 0.5m walking distance of a primary school, the secondary school (WGC) and college facilities are further away		The site is within 1,400m of St Mary's CE Primary School, Knightsfield School (specialist school for hearing impaired), Monks Walk School secondary school and Sherrardswood Independent School.

## Site Wel16

Section	Comm ent ref	Main Issue	Changes Sought	Response
N/A	Pc595	Correct capacity of site Wel16 is 95 homes (and not 65), which is deemed acceptable in transportation terms by HCC Highways.	Correct capacity of Wel16 to state 95 homes	LUC assessed the capacity of sites on the basis of information provided to us by the Council. The capacity was moderated by the Council to reflect the steep topography, setting of the conservation area and overhead power lines. Note that a capacity of 95 would not result in a change to the SA score of negligible (0).
Objective 5.1	Pc237	How can a significant positive for this objective be identified when no plans have been produced and these site are on the periphery of the village		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 6.6	Pc237	Disagree with the significant positive score for site Wel16 against objective 6.6 (access to learning, training and skills development), as this is within 0.5 walking distance of a primary school.		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum.



## Welham Green

### Site WeG1

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.5	Pc610	Historic England noted “there are no designated heritage assets within this site, but it is immediately adjacent to ‘The Hope and Anchor Public House’ (Grade II Listed), and ‘9, Station Road’ (also Grade II Listed). Development of this has the potential to impact upon the setting of this designated heritage asset.		Site WeG1 is not adjacent to the Hope & Anchor Pub or 9 Station Road (both lie further to the north of the site), but they do lie within 250m of the site, as does 15 Station Road. However, given the local context, and screening provided by other buildings (discussed in the SA matrix), the site was scored negligible for this issue (reduced from minor negative). This is consistent with the 2016 SA Report.

### Site WeG3a

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.5	Pc611	Historic England noted there are no designated heritage assets within this site, but it is immediately adjacent to ‘The Hope and Anchor Public House’ (Grade II Listed), and ‘9, Station Road’ (also Grade II Listed). Development of this has the potential to impact upon the setting of this designated heritage asset.		Site WeG3a is not adjacent to the Hope & Anchor Pub or 9 Station Road (both lie further to the north of the site), but they do lie within 250m, as does 15 Station Road. Therefore, based on the Assumptions the site would score significant negative with uncertainty (--?), but it is considered reasonable to reduce this to minor negative, given the site context provided by other buildings. No change to score.

**Site WeG15**

Section	Comment ref	Main Issue	Changes Sought	Response
	pc369	<p>Option 5 can't be considered to represent the most appropriate strategy in line with the NPPF (Para 182, 2012) as it would secure fewer social, environmental and economic benefits than other options.</p> <p>This site contributed to Options 1, 2, 3 and 4 and demonstrated that it is capable of contributing to a number of strategic growth options, including those that can secure substantial sustainability benefits. It is only in Option 5 which it isn't included.</p>	It would be more appropriate to progress with Option 1.	Noted.

## Brookmans Park

### Site BrP1

Section	Comment ref	Main Issue	Changes Sought	Response
Objectives 4.2 and 4.3	Pc352	Disagree with the significant positive score for Site BrP1 against objectives 4.2 (reduce CO2 emissions from transport) and 4.3 (avoid/reduce air pollution), which states this is within 400m of bus stops. The bus service is non-existent and only operated for a very limited number of days and half an hour on prescribed days.		According to the GIS data held by LUC, the site is within a bus stop served by a six day a week service at Chancellor's School, but it is acknowledged that this is no longer correct. As such, the score should be considered amended to negligible (0).
Objective 6.1	Pc352	Disagree with the significant positive score for Site BrP1 against objective 6.1 that states it "is within walking distance of education establishments". The only educational establishment within walking distance is Chancellor Secondary School. Whilst Brookmans Park Primary School is over 2km; and St Mary Primary school (Welham Green is 4km; from the site.	Reduce the score	Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. Distances are measured in a straight line and assume a longer walking distance (see footnote 23).
Objective 4.6	Pc612	Historic England have indicated this site's western boundary lies immediately adjacent to two Grade II Listed buildings - 'Carpenter Cottage' and '56, Bell Lane (.i.e. Not 1 Listed Building as stated in the text).		The SA matrix for BrP1 states: This site is adjacent to the Grade II listed Carpenters Cottage and 56 Bell Lane. The significant negative score would be the same for 1 or 2 listed buildings adjacent to the site (-?).

**Little Heath**

**Site LHe4/5**

<b>Section</b>	<b>Comment ref</b>	<b>Main Issue</b>	<b>Changes Sought</b>	<b>Response</b>
Objective 1.1	Pc502	The assessment of these sites is flawed, as Little Heath has no village centre. Facilities and services are limited and the nearest shopping centres are over a mile away.		Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. Reasons for scores are provided within the SA matrix.

## Cuffley

### Site Cuf12

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.4	Pc595	Excessively cautious approach undertaken in the analysis of this landscape character of this parcel (which lies between an established brownfield site with substantial built form to the Northaw Road East frontage and the existing settlement); in contrast to very open parcels (such as PB1 and SDS6). Hence, the sensitivity of former should not be identified as “moderate-high	Amend score of objective 4.4 (Landscape Character) from significant negative uncertain to minor negative uncertain (assuming correction to landscape character).	The SA has drawn on the Landscape Sensitivity Assessment (2019), which was prepared by landscape specialists. It does not in itself devise assessments of landscape sensitivity.

### Site Cuf7

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.4	Pc595	<p>Excessively cautious approach undertaken in the analysis of the landscape character of this parcel (which is a very established brownfield site with substantial built form to the Northaw Road East frontage); in contrast to very open parcels (such as PB1 and SDS6). Hence, the sensitivity of former should not be identified as “moderate-high</p> <p>This site should be identified as previously developed land (and not partial developed), as it almost entirely comprises of land and buildings that are used for employment uses, housing and paddock areas for horsiculture, employment</p>	<p>Amend score of objective 4.4 (Landscape Character) from significant negative uncertain to minor negative uncertain</p> <p>4.4 (PDL) from minor positive to significant positive.</p>	<p>The SA has drawn on the Landscape Sensitivity Assessment (2019), which was prepared by landscape specialists. It does not in itself devise assessments of landscape sensitivity.</p> <p>The assessment of a mix of previously developed land and greenfield is maintained – the paddocks constitute greenfield land.</p> <p>Pre-application and Masterplanning /design submissions are not taken into account in the SA to ensure that all sites are assessed on a like-for-like basis.</p>

Rural areas

Site Hat15

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 1.1	Pc540	Unclear why Hat15 was given a minor positive score against objective 1.1, as it is not within 720m of community facilities. This score is inconsistent with other sites such as Cuf5, Cuf6 that are within 720m & 1400m of community facilities. Hat15 is unlikely to be categorised as a deprived/poor health area	Amend score of Hat15 against Objective 1.1 to '0' (negligible effect).	The SA notes that there are no community facilities within 720m. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. The deprivation element is considered relevant to all sites. This is a proxy for whether the site could help improve a deprived area.
Objective 4.2		Disagree with the significant positive score of Hat15 against objectives 4.2 (Proximity to employment area), as this is not within 1400m of Hatfield Business Park (.i.e. 2KM+). This is also inconsistent with site SDS5 (++) that is adjacent to the former employment area.	Reduce the score of Hat15 against Objective 4.2 to minor positive (+) or minor negligible (0) due to poor access to employment area	The site is within 1,400m of Hatfield Business Park according to our GIS information, in line with the Assumptions in Appendix A of the SA Addendum. Distances have been measured in a straight line from the edge of the site to the edge of the business park. This is consistent with how distances have been measured across all thresholds for all sites throughout the SA process. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 4.2		Disagree with the neutral score of Hat15 against objective 4.2 (Proximity to transport) , as this is more than 1,400 metres to a rail station (.i.e. 4km) and 400m from the nearest bus stops at Coopers Green Lane and Green Lanes (.i.e. 1km). Evidence at hearings demonstrated that the commuting distance to Hatfield Station Hatfield Station cannot be made sustainable by passenger transport and the proposed bus loop to serve site would be unviable. Compared to ++ score for BrP4 (close to Bus & rail station), the score of Hat15 should be negative.	Amend score of Hat15 against objective 4.2 (Transport ) to minor negative	The SA recognises that the site is over 1,400m from a rail station and over 400m from a bus stop. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum. The site assessment does not take into account any mitigation or policy requirements.

Objective 4.3		<p>Score (++) of Hat15 against objective 4.2: Avoid/reduce air pollution (proximity to employment and services) should be reduced to minor positive or negligible due to reasons noted for objective 4.2 above.</p> <p>Significant positive Score (++) of Hat15 against objective 4.3: Avoid/reduce air pollution (proximity to transport services) should be reduced to negligible to minor negative due to reasons noted for objective 4.2 above.</p>	<p>Amend score of Hat15 against objective 4.3 (Employment) to minor positive (+) or legible (0)</p>	
Objective 4.4		<p>Disagree with the negligible score (0) for Hat15 against objective 4.4 (open space), as the site is open in landscape/Green Belt terms and could be considered a natural green space. Development will have a significant detrimental impact on the use of this and existing rights of way. Mitigations of including formal and informal open space will not compensate the disruption of the rights of way across site.</p>	<p>Amend score of Hat15 against objective 4.3 (Transport) to minor negative</p> <p>Amend score of Objective 4.4 Protect and enhance open space: to significant negative).</p>	<p>Open space refers to the planning term, i.e. publicly accessible open space. The types of space included in this objective are set out in the Assumptions in Appendix A of the SA Addendum. The scoring does not take into account mitigation recommendations. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.</p>
Objective 4.4		<p>Disagree with score negligible (0) for Site Hat15 against objective 4.4 (Retaining local distinctiveness) and reason given that "it makes little/no contribution to GB purpose 2 (merger of settlements) and local purpose". Due to (1) Maintaining the existing settlement pattern is not the same concept as retaining local distinctiveness. (2) Hat15 will result in a new settlement within the most undeveloped and open areas of countryside in the Borough, which would have a major negative effect on local distinctiveness.</p>	<p>Amend score of Objective 4.4 Retaining local distinctiveness to significant negative.</p>	<p>The score for Retaining local distinctiveness is minor negative (-). This is in line with the Assumptions presented in Appendix A of the SA Addendum.</p>

Objective 4.6		The score of site Hat15 against objective 4.6 (Biodiversity/geodiversity) should not be significant negative uncertain, as it is adjacent to a Local Wildlife Sites/ Ancient Woodland, and it is inevitable that development would have a significantly detrimental impact	Amend score of objective 4.6 (biodiversity and geodiversity) to - - (significant negative).	The SA recognises the site is adjacent to wildlife sites and ancient woodland, but it does not overlap with these. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.
Objective 6.6		Unclear why the score of Hat15 against objective 6.6 (access to training skills and skills development) is significant positive uncertain, as the new settlement will require a new 2FE primary school onsite and a new 8-10FE secondary school on Site SDS5: North West Hatfield; rather than the expansion of education facilities. It is questionable whether the site is within 1400m walking distance of a school. Hat15 will be separated from school by Coopers Green Lane that acts a significant access barrier and will need upgrading for traffic from Hat15 and SDS5. In line with SA assumptions criteria of objective 6.6 (Appendix A), the score should be amended to +? or 0.	Amend score of objective 4.6 from Uncertain Significant positive to either to uncertain minor positive or 0.	The policy requirements for new school provision on site and off-site are noted. The SA is based on the proximity of existing schools to the site. The site is within 1,400m of St John's C of E Primary School in Lemsford. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.



## Swanley Bar

### Site SB1

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 5.1	Pc595	Text for Site SB1 by error indicates a potential capacity of 159 dwelling rather 300 dwellings with a 1 form primary school. Hence, score of this against objective 5.1 (amount of housing) needs correcting from 0 to Significant positive	Amend score of site SB1 against objective 5.1 from 0 to Significant positive	LUC assessed the capacity of sites on the basis of information provided to us by the Council. In this case, the Council reduced the capacity to mitigate heritage asset impacts and allow landscape buffering. No assumptions have been made about provision of additional services, such as new schools.
Objective 4.5	Pc595	Site SB1 is not adjacent to any heritage assets. The score of this against Objective 4.5 (heritage assets) needs correcting.	Amend score of site SB1 against objective 4.5 from Significant negative to minor negative	The site is adjacent to Gobions (Gubbins) Grade II Registered Park and Garden, which lies on the other side of Swanley Bar Lane. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.

### Sites SB1A and SB1B

Section	Comment ref	Main Issue	Changes Sought	Response
Objective 4.5	Pc595	Site SB1 is not adjacent to any heritage assets. The score of this against Objective 4.5 (heritage assets) needs correcting.	Amend score of site SB1 against objective 4.5 from Significant negative to minor negative	The site is adjacent to Gobions (Gubbins) Grade II Registered Park and Garden, which lies on the other side of Swanley Bar Lane. Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.

**Lemsford**

**Site StL13**

Section	Comment ref	Main Issue	Changes Sought	Response
	Pc334	SA fails to take account of promoter's master plan for the site. This will provide; community parking area to remove school traffic from the village road in peak times; a new play space; 15 acres of landscaped country park (south). This ensures the separation of the Lemsford and Stanborough settlements; improve existing links to the PROW network. These would improve the SA scoring matrix	Assessment should be based on evidence provided by the landowner/promoter, to ensure the scores are correct	The SA does not take into account masterplans or mitigation as this allows all sites to be assessed on a comparable basis, on their own merits.  Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.
	Pc332	Scoring does not reflect representations and technical studies made by the landowner.		The SA does not take into account mitigation or site-specific studies as this allows all sites to be assessed on a comparable basis, on their own merits.  Scoring is in line with the Assumptions presented in Appendix A of the SA Addendum.

**Site StL16**

Section	Comment ref	Main Issue	Changes Sought	Response
	pc332	Scoring does not reflect representations and technical studies made by the landowner.		The site has been assessed in line with the Assumptions presented in Appendix A of the SA Addendum. Technical studies and other detailed site-specific information has not been taken into account as such information is not available on a consistent basis across all sites. As such, all sites have been assessed in the same level of detail, as required by the PPG.