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Welwyn Hatfield Proposed Submission Local Plan 2016

Sustainability Appraisal

Prepared by LUC
August 2016

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1 Introduction

- 1.1 Welwyn Hatfield Borough Council (WHBC) commissioned LUC in 2008 to undertake a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan.
- 1.2 This is the SA Report to accompany WHBC's consultation on the Proposed Submission version of the Welwyn Hatfield Local Plan 2016, covering the plan period 2013-2032, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Welwyn Hatfield Local Plan

- 1.3 The Welwyn Hatfield Local Plan will set out the Council's vision, objectives and delivery strategy for new development in Welwyn Hatfield Borough to at least 2032 and will eventually replace the saved policies in the Welwyn Hatfield District Plan 2005.
- 1.4 Strategic policies set out in an Emerging Core Strategy (ECS), were first consulted on between November 2012 and January 2013. The Core Strategy was going to be published separately and in advance of the Site Allocations and Development Management DPD. WHBC have since decided to combine the two documents into a single Local Plan in order to speed up the plan making process.
- 1.5 With this decision, and in the light of new evidence on objectively assessed housing need, WHBC revisited the distribution of housing between settlements published in the ECS. This focussed on sites within urban areas and then looked to areas adjacent to Welwyn Garden City (WGC) and Hatfield alone to accommodate the necessary development to meet the Borough's housing need. WHBC are now proposing a more dispersed and proportionate distribution with the focus of development still on WGC and Hatfield, but some development also proposed adjacent to the larger villages. This revised approach was reflected in the Local Plan Consultation Document, published in January 2015.
- 1.6 Drawing upon the ECS, the Local Plan Consultation Document and other published documents relating to the Local Plan preparation process, and taking into account consultation comments and further evidence gathered, WHBC is now publishing its Proposed Submission Local Plan. The Proposed Submission Local Plan represents the Local Plan which the Council wishes to adopt, and which will be submitted to the Secretary of State to be examined in public.
- 1.7 The Proposed Submission Local Plan covers the period up until 2032 and sets out:
 - The overarching strategy for the Borough, including the vision for the Borough and Borough-wide objectives, the delivery of sustainable development, and the amount of growth that the Borough needs to accommodate during the Local Plan period.
 - The Settlement Strategy, and approach to Green Belt boundaries.
 - Topic specific policies, relating to movement (e.g. transport and access), centres, services and facilities including retail development, the type and mix of housing, the economy, the quality of development, environmental assets and infrastructure.
 - Settlement policies, focusing on Welwyn Garden City and Hatfield, but also a number of villages, a new village at Symondshyde to the north-west of Hatfield, the rural areas and neighbourhood planning.
 - Implementation and monitoring of the Local Plan.

Overview of Sustainability Appraisal and Strategic Environmental Assessment the SEA Directive

- 1.8 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), which was transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 20014 (2004 SI 1633), known as the ‘SEA Regulations’.
- 1.9 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance¹), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken for the Welwyn Hatfield Local Plan. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.
- 1.10 The SA process comprises a number of stages, as shown in **Figure 1.1**.

Figure 1.1: Main stages of Sustainability Appraisal

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
Stage B: Developing and refining options and assessing effects
Stage C: Preparing the Sustainability Appraisal Report
Stage D: Consulting on the preferred options for the Local Plan and the SA report
Stage E: Monitoring the significant effects of implementing the Local Plan

Meeting the requirements of the SEA Regulations

- 1.11 This SA Report includes the elements of the ‘Environmental Report’ (the output required by the SEA Regulations) required up until the Proposed Submission stage of Local Plan preparation. **Table 1.1** below signposts the relevant sections of the SA Report that are considered to meet the SEA Regulations requirements. The remainder will be met during subsequent stages of the Local Plan preparation following Proposed Submission up until adoption of the Local Plan.

Table 1.1: Meeting the Requirements of the SEA Regulations

SEA Regulations’ Requirements	Covered in this SA Report?
Environmental Report	
Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of: (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).	This SA Report for the Welwyn Hatfield Proposed Submission Local Plan 2013-2032 constitutes the ‘environmental report’.
1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Chapters 1 and 3 and Appendix 3.

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/strategic-environmental-assessment-and-sustainability-appraisal-and-how-does-it-relate-to-strategic-environmental-assessment/>

SEA Regulations' Requirements	Covered in this SA Report?
2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3 and Appendix 4.
3) The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Appendix 4.
4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.	Chapter 3 and Appendix 4.
5) The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3 and Appendix 3.
6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in subparagraphs (a) to (l).	Chapter 6 and Annex 1.
7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 6 and Annex 1.
8) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapters 5, 6 and Appendix 5.
9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 7.
10) A non-technical summary of the information provided under paragraphs 1 to 9.	Prepared as a separate accompanying report.
The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: (a) current knowledge and methods of assessment; (b) the contents and level of detail in the plan or programme; the stage of the plan or programme in the decision-making process; and (c) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3))	Methodology set out in Chapter 2 and the objectives and criteria in Chapter 4, and the assumptions used in the SA in Appendix 2.
Consultation	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))	A Scoping Report was prepared by LUC during 2008 which was subject to consultation from March to May 2008. An additional Scoping Report was prepared in August 2014 and provided to the statutory consultation bodies, in order to update and reflect the plan

SEA Regulations' Requirements	Covered in this SA Report?
	preparation and SA process at that time.
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:</p> <ul style="list-style-type: none"> (a) send a copy of those documents to each consultation body; (b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees"); (c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent. <p>The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	<p>In addition the Scoping consultations, SA findings have been consulted upon at the Core Strategy Issues & Options stage (4 March to 11 May 2009), 'How Many New Homes' stage (6 June to 18 July 2011), Emerging Core Strategy stage (12 November 2012 to 31 January 2013), and Local Plan Consultation Document stage (23 January to 20 March 2015).</p> <p>This SA Report meets the requirements of Regulation 13.</p>
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <ul style="list-style-type: none"> (a) notify the Secretary of State of its opinion and of the reasons for it; and (b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. <p>(Regulation 14 (1))</p>	<p>Not relevant as there will be no effects beyond the UK from Welwyn Hatfield Local Plan.</p>
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <ul style="list-style-type: none"> (a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge. <p>(Regulation 16(1))</p>	<p>Requirement will be met at the adoption stage in the SA process.</p>
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <ul style="list-style-type: none"> (a) the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State, <p>that the plan or programme has been adopted, and a statement containing the following particulars:</p> <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant 	<p>Requirement will be met at the adoption stage in the SA process.</p>

SEA Regulations' Requirements	Covered in this SA Report?
environmental effects of the implementation of the plan or programme.	
Monitoring	
The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))	Chapter 7.

Habitats Regulations Assessment

- 1.12 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. European sites comprise Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and under UK Government policy Ramsar sites.
- 1.13 The HRA for the Welwyn Hatfield Local Plan has been undertaken by LUC on behalf of the Council. The HRA is reported on separately to the SA². It concluded that The Welwyn Hatfield Proposed Submission Local Plan will not have adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects. In coming to this conclusion, the HRA recommended that issues relating to the capacity of Rye Meads WwTW and its relationship with Lee Valley SPA and Ramsar site need to be planned carefully and monitored.

Objectives and structure of the SA report

- 1.14 This report constitutes the SA Report for the Proposed Submission version of the Welwyn Hatfield Local Plan 2016. Both the SA Report and the Proposed Submission Local Plan are being published for consultation at the same time in order to provide the public and statutory consultation bodies with an opportunity to express their opinions on the SA Report and so that it can be used as a reference point when commenting on the Local Plan.
- 1.15 This introductory section (**Chapter 1**) provides an introduction to the Welwyn Hatfield Local Plan and an overview of SA. The remainder of the main body of the SA report is structured as follows:
- **Chapter 2 – Sustainability Appraisal Methodology:** describes the methodology that has been used for the SA, and describes any difficulties that have been encountered during the SA process.
 - **Chapter 3 – Context and Baseline:** sets out background to the Borough, provides a review of plans, policies and programmes of relevance to the Local Plan, and identifies the key local sustainability issues that provide the context for the SA.
 - **Chapter 4 – SA Framework:** presents the SA objectives and criteria that have been used to appraise the Local Plan policies and reasonable alternatives.
 - **Chapter 5 – Evolution of the Local Plan:** describes how the Local Plan has evolved over time to become the Proposed Submission Local Plan, and the reasonable alternatives considered during the Local Plan preparation process.

² LUC (August 2016) Welwyn and Hatfield Proposed Submission Local Plan 2016 Habitats Regulations Assessment Report

- **Chapter 6 – Sustainability Appraisal Findings:** sets out a summary of the findings of the appraisal of the strategic policies, development management policies and site allocations.
- **Chapter 7– Monitoring:** presents the proposed arrangements for monitoring the significant effects of implementation of the Local Plan as identified by the SA.
- **Chapter 8 – Conclusions and Next Steps:** summarises the findings of the SA of Welwyn and Hatfield Local Plan and policies and describes the next steps that will be undertaken to progress the Plan and the SA.

1.16 At the end of this main report is a series of appendices, as follows:

- **Appendix 1** presents the consultation responses that were received at the various stages of consultation on the SA work accompanying the Local Plan preparation process and outlines how each has been responded to.
- **Appendix 2** presents the assumptions used when applying the SA Framework to the appraisal of housing and employment sites.
- **Appendix 3** presents the plans and programmes of relevance to the Welwyn Hatfield Local Plan.
- **Appendix 4** presents the baseline information.
- **Appendix 5** provides a statement of reasons for the inclusion or exclusion of sites.

1.17 The main SA report is also accompanied by a separate document, **Annex 1**, which presents the detailed policy and site appraisal matrices.

1.18 Reference should also be made to the following Reports which are available on the Council's website:

- SA of the Issues and Options Consultation (March 2009)³
- SA Report of the Emerging Core Strategy (September 2012)⁴.
- SA Report of the Local Plan Consultation Document (September 2014)⁵

³ <http://www.welhat.gov.uk/article/763/Core-Strategy-Issues-and-Options>

⁴ <http://www.welhat.gov.uk/article/4616/Emerging-Core-Strategy>

⁵ <http://www.welhat.gov.uk/localplan>

2 Sustainability Appraisal Methodology

Schedule (8) of the SEA Regulations requires that the Environmental Report shall include:

“...a description of how the assessment was undertaken including any difficulties (such as technical difficulties or lack of know-how) encountered in compiling the required information.”

- 2.1 The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving ongoing iterations to identify and report on the likely significant effects of the emerging plan and the extent to which sustainable development is likely to be achieved through its implementation.
- 2.2 In addition to complying with legal requirements, the approach taken to the SA of the Welwyn Hatfield Proposed Submission Local Plan was based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance⁶. **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 2.1: Corresponding stages in plan making and SA

Local Plan Step 1: Evidence Gathering and engagement
SA stages and tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • 1: Identifying other relevant policies, plans and programmes, and sustainability objectives • 2: Collecting baseline information • 3: Identifying sustainability issues and problems • 4: Developing the SA Framework • 5: Consulting on the scope of the SA
Local Plan Step 2: Production
SA stages and tasks
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • 1: Testing the Plan objectives against the SA Framework • 2: Developing the Plan options • 3: Evaluating the effects of the Plan • 4: Considering ways of mitigating adverse effects and maximising beneficial effects • 5: Proposing measures to monitor the significant effects of implementing the Plan
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • 1: Preparing the SA Report
<p>Stage D: Seek representations on the Plan and the Sustainability Appraisal Report</p>

⁶ <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

- 1: Public participation on Plan and the SA Report
- 2(i): Appraising significant changes

Local Plan Step 3: Examination

SA stages and tasks

- 2(ii): Appraising significant changes resulting from representations

Local Plan Step 4 & 5: Adoption and Monitoring

SA stages and tasks

- 3: Making decisions and providing information

Stage E: Monitoring the significant effects of implementing the Plan

- 1: Finalising aims and methods for monitoring
- 2: Responding to adverse effects

Stage A: Scoping

- 2.3 The SA process began in January 2008 with the production of a SA Scoping Report, which was published for consultation in March 2008.

Review of policies, plans and programmes and baseline information

- 2.4 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed (see **Chapter 3** and **Appendix 3**).
- In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, flora and fauna; population and human health; water; soil; air; climatic factors; material assets; cultural heritage and the landscape. Data on social and economic issues were also taken in to consideration. This baseline information provided the basis for predicting and monitoring the likely effects of the Local Plan and helps to identify alternative ways of dealing with any adverse effects identified (see **Chapter 3** and **Appendix 4**).
- Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for the Borough were identified (including environmental problems, as required by the SEA Regulations) (see **Chapter 3**).

- 2.5 The review of relevant plans, policies and programmes and the baseline information was updated as necessary at each stage of the SA process to ensure that they reflect the current situation in Welwyn Hatfield.

Development of the SA Framework

- 2.6 Drawing on the work above, an SA Framework was developed, setting out the SA objectives against which options and subsequently policies were to be appraised (see **Chapter 4**). The SA Framework provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. The SA framework is designed to set out a series of sustainability objectives and associated questions that can be used to "interrogate" options and

policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the Borough with regard to social, economic and environmental considerations. During the SA, the performance of the plan options (and later, policies) were assessed against these SA objectives and appraisal questions.

Scoping workshop

- 2.7 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.
- 2.8 To inform the development of the SA Framework and involve stakeholders at an early stage a half day Scoping Workshop was held on 6th February 2008. This was attended by 26 stakeholders, including representatives of the Local Strategic Partnership (including the Chamber of Commerce, Environment Forum, Transport Partnership and YMCA), Hertfordshire County Council, Hertfordshire Prosperity and the Hertfordshire Constabulary, as well as representatives of the Environment Agency, Home Builders Federation and Wimpey Homes, and nine officers from Welwyn Hatfield Borough Council.
- 2.9 The Workshop included an introductory presentation by LUC before two working group sessions followed by feedback. Attendees were split into four interest groups – housing, economy, transport, environment – facilitated by LUC team members.
- 2.10 In the first workshop session, the groups considered the sustainability issues identified in the topic papers most closely relating to their interests. The first session considered whether the correct key issues had been identified, amended the issues as necessary and added any missing issues. Participants also ranked the issues in order of importance in order that only key sustainability issues would be addressed in the SA Framework.
- 2.11 The second session considered the draft SA Framework and participants commented on the proposed sustainability objectives. The comments from the Workshop were considered and reflected in the Topic Papers and SA Framework.

Consultation on the Scoping Report March 2008

- 2.12 The Scoping Report was formally published in March 2008 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and English Heritage (now Historic England)) as well as a number of other relevant stakeholders that were identified by the Council. It was also made available to the public on the Council website.
- 2.13 **Appendix 1** lists the comments that were received during the scoping consultation and describes how each one has been addressed.

Additional Scoping Report August 2014

- 2.14 An Additional Scoping Report was produced in August 2014 with respect to the consultation that Welwyn Hatfield Borough Council carried out in January 2015 in order to inform the preparation of the Local Plan. The focus of the consultation and the SA was on the overall spatial strategy and options for site allocations.
- 2.15 The purpose of the Additional Scoping Report was to set out the methodology for undertaking the SA, including the assumptions that were to be used by which the likely effects of the potential site allocations in the emerging Local Plan could be assessed. It was not intended to replace the earlier SA Scoping work, but to supplement it, in order that the statutory consultation bodies (Environment Agency, Historic England, Natural England) could provide their views on the approach to be taken with respect to the scope and level of detail of the SA work during that stage of Local Plan preparation.
- 2.16 **Appendix 1** lists the comments that were received during the additional scoping consultation and describes how each one has been addressed.

Current SA Framework

- 2.17 The most up-to-date version of the SA Framework, which has been used in the SA of the Welwyn Hatfield Proposed Submission Local Plan is presented in **Chapter 4** of this SA Report, together

with more detail on how the SA Framework was used to appraise Local Plan strategy, policy and site options. The assumptions used to appraise housing and employment sites are presented in **Appendix 1**.

SA Stage B: Developing and refining options and assessing effects

- 2.18 Developing options for a Local Plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

Regulation 12 (2) of the SEA Regulations requires that:

"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

- 2.19 It should be noted that any alternatives considered for the plan need to be 'reasonable'. This implies that alternatives that are 'not reasonable' do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the overarching Vision and Objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.
- 2.20 It also needs to be recognised that the SA findings are not the only factors taken into account when determining a preferred option to take forward in a Local Plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 2.21 The SA has been progressing since the early stages of the Local Plan. Following consultation on the Scoping Report in March 2008, WHBC has taken account of the following stages of SA which have run alongside the policy development process:
- SA of Issues and Options – Consultation of Issues and Options Plan (incorporating SA) – consultation, March to May 2009.
 - SA of Alternative Housing Targets – Spring 2011 – appraisal of five high level housing targets, consultation June – July 2011.
 - SA of the Emerging Core Strategy 2012 – presentation of the final SA findings, published in September 2012, consultation November 2012 and January 2013.
 - SA of Local Plan Consultation Document – focusing on strategic policy intentions which had changed from the ECS, potential site allocations and a list of development management policy intentions, consultation January and March 2015.
- 2.22 Consultation comments received on the SA work stage, and how they have been responded to, are included in **Appendix 1**.
- 2.23 At each stage of the Local Plan preparation and SA process, LUC has provided WHBC with recommendations for changes to the Local Plan in order to improve its likelihood of delivering sustainable development. For example, the SA of the Emerging Core Strategy identified that the proposed focus of development on the two main towns of Welwyn Garden City and Hatfield could lead to some of the villages not being able to meet their needs. As a result, and in response to consultation comments, the Proposed Submission Local Plan provides for a greater proportion of development at the villages, whilst still retaining an urban focus.

- 2.24 Since the early March 2015 consultation, WHBC has been reviewing consultation responses, reviewing the updated evidence base, and also considering further sites that have been put forward or identified for potential inclusion in the Proposed Submission Local Plan.
- 2.25 Throughout this period, the SA team at LUC has been carrying out SA work, appraising each of the new sites, updating appraisals to take into account consultation responses on earlier work, and new evidence. All appraisal work has been undertaken to a consistent level of detail at each stage, including the consideration of reasonable alternatives.
- 2.26 WHBC has taken the findings of the SA work into account when preparing the Proposed Submission Local Plan.
- 2.27 A description of the evolution of the Local Plan, including the options considered in order to inform the final decisions on what should be included in the Proposed Submission Local Plan, is provided in **Chapter 5** of this SA Report.

SA Stage C: Preparing the Sustainability Appraisal report

- 2.28 This SA Report represents the 'environmental report' required under the SEA Regulations. It describes the process undertaken in carrying out the SA of Welwyn Hatfield Local Plan. It sets out the findings of the appraisal, highlighting any likely significant effects, both positive and negative, and the measures proposed in the Local Plan to mitigate negative effects and maximise the benefits of the plan. It also proposes monitoring measures.
- 2.29 The SA findings for the Welwyn Hatfield Proposed Submission Local Plan, and of the reasonable alternatives considered, are summarised in **Chapter 6**, including an assessment of the potential cumulative impacts of the Local Plan as a whole. Detailed appraisal matrices of the policies in the Proposed Submission Local Plan, and of the site allocations and reasonable alternatives are included in **Annex 1**.
- 2.30 Not all of the earlier SA work is included in this SA Report in order to keep the length of this SA Report reasonable and proportionate. However, the key findings of all the work undertaken at earlier stages are included. The detailed SA Reports at the earlier stages are available on the WHBC website.

SA Stage D: Consultation on the Welwyn Hatfield Local Plan and this SA Report

- 2.31 Welwyn Hatfield Borough Council is inviting comments on the Welwyn Hatfield Proposed Submission Local Plan 2016 and this SA Report as part of the formal consultation stage under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Both documents are being published on the Council's website for consultation between August 2016 and October 2016.

SA Stage E: Monitoring implementation of the Local Plan

- 2.32 This SA Report sets out recommendations for monitoring the significant sustainability effects identified by the SA of the Welwyn Hatfield Proposed Submission Local Plan once adopted. However, these recommendations will need to be revisited to reflect the final set of significant effects identified as likely to occur as a result of implementing the Welwyn Hatfield Local Plan once adopted. The monitoring proposals should be considered within the context of the broader monitoring framework for the SA Report and the data collection for WHBC's Annual Monitoring Report.

Data limitations and difficulties encountered

2.1 There were no significant technical difficulties encountered during the preparation of this SA of the Proposed Submission Local Plan. Certain data limitations did arise during the course of the SA, notably:

- The sheer number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has been impossible within the resources available to prepare the Scoping Report to consider every potentially relevant document in detail. However, an attempt has been made to draw out the key generic messages relevant to the preparation of the Local Plan and the SA.
- For some of the sustainability topics examined during Scoping, there was a lack of depth of baseline data for Welwyn Hatfield. Data was generally available for recent years, but in some cases it has not been possible to identify key trends against contextual indicators due to a lack of available information.
- The actual impacts of policies will depend very much upon how they are applied in specific locations. Professional judgement has therefore had to be applied to identify likely effects of implementing strategic policies. For sites, a series of assumptions have been used as a guide to ensure consistency in the identification of the nature of the effects on each SA objective (see **Appendix 2**).
- The appraisal process included a considerable amount of liaison between LUC as the SA consultants and the officers at Welwyn Hatfield Borough Council, particularly with respect to the appraisals of the site allocations and reasonable alternatives. There have been a number of alterations to the number of sites, and also the site boundaries, as well as the development proposed for each site, and the policy criteria applying to them. This has happened throughout the SA process. Every effort has been made to ensure that the final version of this SA Report reflects the final version of the Proposed Submission Local Plan in order to reduce the likelihood of errors being reported.
- Similarly, the evidence base upon which effects have been identified has continued to evolve and was often updated throughout the plan preparation process. Every effort has been made to ensure that the final version of this SA Report reflects the latest evidence base.
- A large number of consultation responses have been received on the SA Reports at earlier stages of the plan preparation process. A considerable amount of time was spent analysing these responses, and considering how to reflect the views made in the SA where appropriate. A detailed account is provided in **Appendix 1**.

3 Context and Key Sustainability Issues

Review of plans, policies and programmes

- 3.1 The Welwyn Hatfield Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, including those relating to economic and social policy. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and local level.

Schedule 2 of the SEA Regulations requires:

(1) *“an outline of the...relationship with other relevant plans or programmes”*; and
(5) *“the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”*

- 3.2 A review has been undertaken of the other plans, policies and programmes that are relevant to the Local Plan, as described in **Chapter 2**. The most recent review can be seen in full in **Appendix 3** and the key findings are summarised below.

Key international plans, policies and programmes

- 3.3 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Welwyn Hatfield Local Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 3.4 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the international directives have been included in **Appendix 2** for completeness.

Key national plans, policies and programmes

- 3.5 The national policy providing context for the Welwyn Hatfield Local Plan is the National Planning Policy Framework (NPPF). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:
- “Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”*
- 3.6 The NPPF also requires Local Plans to be “aspirational but realistic”. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.7 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;

- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

3.8 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Local plans, policies and programmes

3.9 At the sub-regional and local levels there are a wide range of plans, policies and programmes that are specific to south Hertfordshire and Welwyn Hatfield, and which provide further context for the emerging Local Plan. Reference has been made to these plans, policies and programmes where relevant, for example where they relate to housing, transport, renewable energy and green infrastructure etc., within the baseline, key issues and other relevant sections where necessary.

3.10 The Welwyn Hatfield Local Plan will set out the strategy, policies and proposals for development in the Borough, and will replace the Welwyn Hatfield District Plan, adopted by the Council in April 2005. Other components of the development plan that are relevant to Welwyn Hatfield are:

- **The Hertfordshire Waste Core Strategy and Development Management Policies Document**, which was adopted on 5 November 2012 and the Waste Site Allocations Document was adopted on 15th July 2014. Together these documents form the Waste Local Plan for Hertfordshire that will be used to make decisions on waste planning applications.
- **The Hertfordshire Minerals Local Plan 2002-2016**, which was adopted by Hertfordshire County Council on 27 March 2007, and is used to make decisions on minerals planning applications.
- **Neighbourhood Plans**, which are normally prepared by parish or town councils, and are required to be in conformity with the Borough-wide Local Plan, but enable local communities to set out a vision for the future of a neighbourhood and establish planning policies for the development and use of land within a defined area. As of May 2016, no Neighbourhood Plans have been adopted in Welwyn Hatfield Borough, although Northaw and Cuffley Parish Council has been designated a Neighbourhood Area for the preparation of a Neighbourhood Plan for the parish area.

3.11 Welwyn Hatfield Borough Council has also adopted a series of Supplementary Guidance Documents (SPDs) and related planning guidance:

- **Welwyn Garden City Town Centre North Supplementary Planning Document (SPD)**, adopted in April 2015, which outlines the council's vision for the Welwyn Garden City Town Centre North site as well as providing an indicative development approach.
- **Interim Car Parking and Garage Policy**, adopted in August 2014, which reflects the Council's agreed approach to treat its existing car parking standards, set out in the Parking Standards Supplementary Planning Guidance, as guidelines rather than maximums, in accordance with a change in Government policy.
- **Welwyn Garden City Guide to Shopfront and Advertisement Design**, adopted in September 2012, which provides advice to those who are considering external alterations to shop fronts and/or installing advertisements or signage to commercial premises in Welwyn Garden City town centre.
- **Houses in Multiple Occupation SPD**, adopted in February 2012, which sets out the Council's proposed approach to planning applications for Houses in Multiple Occupation.
- **Planning Obligations SPD**, adopted in February 2012, provides detailed guidance on the type and scale of planning obligations sought in the Borough, in addition to setting out the Council's approach to securing planning obligations, with the aim of establishing a transparent, fair and consistent process for negotiating and monitoring planning obligations.
- **High View SPD**, adopted in April 2011, which sets out the planning framework to guide the re-development of the High View area.
- **Broadwater Road West SPD**, adopted in December 2008, which outlines the Council's vision for the future of Broadwater Road West and sets out a masterplan to guide and promote the comprehensive redevelopment of this key site in the Borough.
- **Supplementary Design Guidance**, adopted in February 2005, which provides guidance on the design and layout of all new development in the Borough.
- **Digswell Character Appraisal**, adopted in January 2004, which sets out the important characteristics of the settlement that should be protected and provides guidelines against which future planning applications for new housing in Digswell will be assessed.
- **Queenswood School Masterplanning Brief**, adopted in March 2003, which requires any proposals for infilling and redevelopment of the Queenswood School site (defined as a 'Major Developed Site in the Green Belt') to be treated in a comprehensive way and brought forward in the context of a master planning brief.
- **Hatfield Town Centre Planning Brief**, adopted in July 2002, which was produced to guide the formulation of development proposals for the eastern end of Hatfield Town Centre.
- **New Barnfield Masterplanning Brief**, adopted June 2000, which explores the potential for re-developing parts of this extensive site.
- **Hatfield Aerodrome Supplementary Planning Guidance (SPG)**, adopted November 1999, which sets out the masterplan for the re-development of the Hatfield Aerodrome site and outlines the key principles that any development on the site should include.

Baseline information

- 3.12 Information about past trends and the current state of the environment provides a baseline against which to assess the likely sustainability effects of the Local Plan and monitoring its outcomes.

Schedule 2 of the SEA Regulations requires information to be provided on:

(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.

(3) The environmental characteristics of areas likely to be significantly affected.

(4) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.

- 3.13 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.
- 3.14 As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included, for example information about housing, social inclusiveness, transport, energy, waste and economic growth. Up-to-date baseline information is presented in **Appendix 4**, with a summary overview of the Borough provided below.

Overview of Welwyn Hatfield

- 3.15 The Borough of Welwyn Hatfield is located in the centre of Hertfordshire with the very south of the Borough bordering the London Borough of Enfield. Central London is around 15 miles south of the Borough boundary. Welwyn Garden City town centre is a major town centre and serves a sub-regional catchment area, although it competes with other centres nearby such as Stevenage, St Albans and Hertford. Hatfield town centre is smaller and serves a more restricted catchment area.
- 3.16 The Borough also contains a number of large and small villages providing a mix of urban, suburban and rural areas, with each town and village having its own identity and character. Overall, 79% of land within Welwyn Hatfield is rural, including the largest amount of woodland of any district in Hertfordshire. There are no nationally designated landscapes, such as AONBs or National Parks located in the Borough.
- 3.17 Welwyn Hatfield is located within the Hertfordshire Central River Valley and the South Hertfordshire Plateau and contains three river catchments (the Upper Colne, Upper Lee and the Lower Lee) and three main rivers (the Lee, Mimram and the Mimms Hall Brook). The rivers and water bodies are key assets to the Borough. Highly valued chalk rivers and streams, such as the Mimram and the Lee, which is not classified as a chalk stream but is fed from the dip slopes of the Chilterns, are a globally scarce habitat of international importance. Due to the topography of the Borough the floodplains associated with these watercourses are relatively constrained.
- 3.18 With respect to nature conservation, a small area of Wormley-Hoddesdon Park Woods, which is designated as an internationally important Special Area of Conservation (SAC), is located within the Borough although the majority of the site is within Broxbourne and East Herts Districts. The internationally important Lee Valley Ramsar site/Special Protection Area (SPA) falls within about 6km of the Borough. The Borough also has five nationally designated Sites of Special Scientific Interest, and nine locally designated Local Nature Reserves and a number of Local Wildlife Sites.
- 3.19 Welwyn Garden City is of international significance, being one of the first garden cities to be created, with development commencing in the 1920s. Both Welwyn Garden City and Hatfield were to be designated as New Towns following the Second World War. However, the Borough's historic interest spans many centuries, as indicated by its containing four scheduled monuments, and over 70 Areas of Archaeological Significance. The built heritage interest is illustrated by a large number of listed buildings included seven grade I Listed Buildings, and 23 grade II* Listed Buildings. The Borough also contains four Registered Parks and Gardens, plus one registered park and garden shared with another local authority and 8 conservation areas within the Borough. One of the Borough's most well-known and valued historic assets is Hatfield House Park and Garden.
- 3.20 The Borough is easily accessible from the north and south by road and rail. The main east coast railway line runs from London to the North East of England and Edinburgh, with regular services from London to Cambridge and Peterborough. The A1(M) passes through the Borough connecting to the M25 to the south. The A414 runs east-west across the Borough connecting to Hertford to the east and St Albans to the west. Despite being relatively self-contained, the Borough's proximity to London and the good transport network in and around Welwyn Hatfield mean that it has strong links to London and also links to Stevenage to the north and St Albans to the west in terms of commuting patterns and housing markets.

- 3.21 The 2011 Census found that the Borough's population was 110,500 people, with the highest increase in population of any of the districts in Hertfordshire. The population of the Borough continues to increase with the most recent population estimate for Welwyn Hatfield (mid-2014) being 116,000 people, which is anticipated to increase to 141,000 people by 2032. There is an increasing proportion of residents over the age of 65 years. House prices in the Borough are well above national averages.
- 3.22 Welwyn Hatfield currently has a strong economy, with an estimated 84,000 jobs in the Borough in 2014, and a high ratio of jobs per resident. As a result, Welwyn Hatfield is a significant workplace destination with a sub-regional role as a centre for employment for surrounding districts - notably Central Bedfordshire, North Herts, East Herts, Stevenage, and St Albans. The number of jobs in the Borough continues to rise year-on-year and unemployment is well below UK averages.
- 3.23 Indicators of the health of the Borough's residents are good, with life expectancy being approximately two years above the national average. Welwyn Hatfield is ranked within the 20% least deprived local authority areas, although there are a small number of wards with higher deprivation, such as Peartree ward in Welwyn Garden City and Hatfield Central.

Key sustainability issues and their likely evolution without the Local Plan

- 3.24 A series of key sustainability issues were identified in the 2008 Scoping Report based on 15 topics covering economic, social and environmental matters. Many of these sustainability issues remain valid, but in carrying out the SA of the Proposed Submission Local Plan it has been necessary to review them and ensure they are up-to-date, based on the baseline information included in Appendix 4 of this SA Report.
- 3.25 In addition, the SEA Regulations require an assessment to be made of how the sustainability issues (described as 'environmental problems' in the SEA Regulations) are likely to evolve without implementation of the Local Plan. In the absence of the Local Plan, there are a number of other policies and plans that would still be in place, and it is within the context of these that the likely evolution of the key issues has been assessed.
- 3.26 The original key sustainability issues identified in the 2008 Scoping Report also helped to inform the development of the original objectives in the SA Framework to be used in the SA (see **Chapter 4**), and the latest update of the key sustainability issues has confirmed that the SA objectives remain relevant and valid, so no significant changes to the SA Framework have been required.
- 3.27 **Table 3.1** sets out the most up-to-date account of key sustainability issues, their likely evolution with implementation of the Local Plan, and how they relate to the SA objectives in the SA Framework.

Table 3.1: Key sustainability issues and likely evolution without the Local Plan

Key issues	Likely evolution without the Local Plan	Relevant SA objective
Population		
<p>The population of is expected to increase by over 20% by 2032.</p> <p>Life expectancy in Welwyn Hatfield is higher than national averages, with an increasingly ageing population.</p> <p>There are significant differences in life expectancy between the least and most deprived communities in the Borough.</p>	<p>Without the Local Plan, the effect of population growth has the potential to increase pressure on local services, however without meaningful planning, some of the most deprived communities could have limited access to vital facilities, such as schools, community services and jobs, which would help reduce their isolation and deprivation. A growing population may also increase recreational disturbance of designated biodiversity sites.</p> <p>The NPPF identifies that local planning authorities should, “<i>plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)</i>” (paragraph 50). Although the NPPF encourages a mix of housing development, it is anticipated that this requirement would be implemented at the local level through an up-to-date policy in the new Local Plan.</p> <p>A new Local Plan can help ensure that the changing demography of Welwyn Hatfield is supported by an adequate supply of housing and accessible community facilities including schools, hospitals and leisure facilities. It can also ensure that there is adequate provision of supporting recreational facilities and open spaces to meet a growing population.</p>	<p>SA objective 1</p> <p>SA objective 3.1</p> <p>SA objective 4.4</p> <p>SA objective 5.1</p> <p>SA objective 6.6</p>
Housing		
<p>There is a need to increase housing delivery in the Borough to meet population growth and identified housing need.</p> <p>Affordable housing levels are low in the Borough, resulting in significant demand and could be increasing the level of homelessness or over-crowding, which is on the rise.</p> <p>There is a need for a greater variety of housing to continue to be delivered in the Borough, including family housing.</p>	<p>Without the Local Plan, there are likely to be ongoing imbalances between housing supply and housing need in the Borough. In relation to affordability, this could lead to many people being priced out of the market or being made homeless. This may have secondary effects on the economy, reducing the Borough’s ability to attract key workers and young families.</p> <p>The Local Plan should provide more certainty in relation to how the Borough will provide the required number and mix (size and tenure) of</p>	<p>SA objective 5.1</p>

Key issues	Likely evolution without the Local Plan	Relevant SA objective
	housing in the most sustainable locations.	
Current supply of permanent and temporary sites for Gypsy and Traveller and Travelling show people is below identified need.	<p>Without the Local Plan, the Borough will not be able to meet the needs of Gypsy and Traveller and Travelling show people. This could lead to increasing overcrowding on existing sites, the illegal use of sites and potential conflict between permanent and travelling communities. By not meeting the needs of traveling communities, there may also be an increased risk of disturbance to designated biodiversity sites.</p> <p>A Local Plan could help to ensure that a suitable amount of land is planned to meet the needs of travelling community, in order to reduce exclusion and tension with other communities. It can also help to ensure that the most suitable land is used which is an area of low flood risk and least sensitivity for species and habitats.</p>	SA objective 5.1
Social inclusion and deprivation		
<p>While the overall level of deprivation is low in the Borough, there are pockets of high deprivation in communities such as Peartree in Welwyn Garden City and Hatfield Central.</p> <p>Health inequalities exist between the most and least deprived communities in the Borough.</p>	<p>The planning system has relatively limited influence on public health in comparison with other public sector policy and funding areas. However, the NPPF states that, <i>“local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and wellbeing”</i> (paragraph 171).</p> <p>Although the NPPF seeks to improve health and wellbeing, Local Plan policies relating to health and wellbeing in Welwyn Hatfield can help to reduce the gaps in provision of facilities for healthcare facilities and infrastructure for sport and recreation and the walking and cycling network. This would help to ensure that there are adequate facilities to encourage individuals to have a more active and healthier lifestyle.</p>	SA objective 1.1 SA objective 1.2 SA objective 4.4
<p>There is scope to improve the skills levels of Welwyn Hatfield Borough residents.</p> <p>There is a need to ensure that the employment rate is increased in areas of high deprivation and highly skilled workers are able to access employment opportunities within</p>	Inequalities in employment opportunities are related to educational attainment, but the Local Plan can encourage regeneration and investment in more deprived communities to encourage economic activity and job creation.	SA objective 6.2 SA objective 6.6

Key issues	Likely evolution without the Local Plan	Relevant SA objective
<p>the Borough.</p> <p>The percentage of 16-18 year olds not in employment, education, or training (NEET) is relatively high in the Borough compared with the rest of Hertfordshire</p> <p>Although there has been a marked improvement in the number of pupils achieving five or more A*-C grades, it is still below the County level.</p>		
<p>Crime levels in the Borough are increasing compared to the rest of the County and the Borough has higher than average rates of theft, criminal damage, arson, violence and sexual offenses</p>	<p>Hertfordshire Constabulary has a statutory duty to provide policing services and enforce criminal law. Therefore, even without the new Local Plan, crime will be addressed. However, the new Local Plan, can help to tackle some of the causes of crime, by reducing the gaps in local community service provision and aid crime prevention via policies on the design of the built environment.</p>	<p>SA objective 2.1</p>
<p>Employment and economic activity</p>		
<p>Although Welwyn Hatfield experiences some out-commuting, overall more people commute into the Borough than commute out.</p> <p>Available employment land is under pressure from development for housing and has reduced by 9.3% between 2013/14 and 2014/15.</p> <p>There are signs of possible mismatches between skills and jobs available in the Borough, especially amongst workers in retail, wholesale, finance, insurance and real estate.</p>	<p>The NPPF states that "<i>the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future</i>" (paragraph 18). Therefore, even without the new Local Plan important economic sectors may stagnate or decline.</p> <p>Without the Local Plan, the loss of employment land may continue. This could result in a reduced number of jobs accessible to local residents from the most deprived neighbourhoods.</p> <p>The implementation of up to date policies in the new Local Plan would help address local economic needs by helping to ensure that there is sufficient employment land available across the Borough in sustainable locations. This could help stimulate investment in jobs in Welwyn Hatfield, which could help to ensure that there is a sufficient supply of training and job opportunities which could help reduce the proportion of people travelling over 10km to work, local road congestion and improve competitiveness.</p>	<p>SA objective 6.1</p> <p>SA objective 6.2</p> <p>SA objective 6.3</p> <p>SA objective 6.4</p> <p>SA objective 6.6</p>
<p>Culture, leisure and recreation</p>		

Key issues	Likely evolution without the Local Plan	Relevant SA objective
<p>There are insufficient facilities to meet the needs of all young people in the Borough.</p> <p>While the provision of sports facilities in the Borough is fairly good, there is uneven provision in the major towns and villages, especially in the southern villages where access to community pitches is very low.</p> <p>Although there are existing disparities in community and sports service provision the most deprived communities can be found within the two main towns where provision is relatively good.</p>	<p>Although existing culture, leisure and recreation facilities will continue to operate, the planning system can have a significant impact on the quality of life experienced by communities, by ensuring that such facilities are included or funded by new development where justified by the development itself.</p> <p>The NPPF requires Local Planning Authorities to <i>“plan positively for the provision of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments”</i> and to <i>“guard against the loss of valued services and facilities”</i> (paragraph 70).</p>	<p>SA objective 1.1</p> <p>SA objective 2.1</p> <p>SA objective 4.2</p>
Transport and travel		
<p>Congestion is an issue in some urban areas within the Borough and along major transport routes such as the A1(M) and A414, which is exacerbated by the lack of an accessible east-west road network.</p> <p>Car traffic is predicted to grow, which will add pressure to the network. Bus services are limited and walking and cycling networks are not as comprehensive and attractive to use as they could be.</p> <p>Levels of car dependency are high and as the population grow, this could increase, adding further pressure to the existing road network.</p> <p>While the largest group of working age residents live within 2km of their workplaces, there is a large proportion of workers which travel between 10km and 20km, which is higher than the County, regional and national average.</p> <p>Levels of commuting into the Borough by workers is relatively high compared to levels commuting out.</p>	<p>In the absence of the new Local Plan, ongoing high levels of car dependency across much of the Borough and a growing population are forecast to result in increased congestion on the strategic and local road networks in the Borough.</p> <p>The Local Plan provides an opportunity to help to maintain and improve existing public transport, cycle and pedestrian networks; locate future development in locations which take maximum advantage of these networks and ensure that future developments are planned and designed in a manner which supports use of these modes.</p>	<p>SA objective 1.1</p> <p>SA objective 4.2</p> <p>SA objective 4.3</p> <p>SA objective 6.2</p> <p>SA objective 6.3</p> <p>SA objective 6.4</p> <p>SA objective 6.6</p>

Key issues	Likely evolution without the Local Plan	Relevant SA objective
Climate change		
<p>CO₂ emission levels in the Borough have decreased from 7.1 tonnes per person in 2005 to 5.4 tonnes per person in 2014⁷. Increase the installation of renewable energy capacity.</p>	<p>In the absence of the Local plan, the Building Regulations require gradually increasing standards of energy efficiency in built development. Carbon emissions from traffic are likely to increase with traffic growth, subject to improvements in fuel efficiency in car manufacture.</p> <p>The Local Plan offers the opportunity to encourage energy efficiency in both the design of development and reducing the need to travel by car.</p> <p>The Local Plan can also provide for a positive policy approach to renewable energy proposals.</p>	<p>SA objective 4.1 SA objective 4.2</p>
Landscape		
<p>The landscape of the Borough is not subject to statutory landscape designations, but an increasing population could place pressure of the immediate landscape of the major towns at Welwyn Garden City and Hatfield, leading to urbanisation and diminish the contribution that the landscape makes to maintain the character of the Borough and its settlements.</p>	<p>In the absence of a Local Plan, there is the potential for development to harm landscape character in Welwyn Hatfield, particularly given the lack of landscape designations. Development could be located in sensitive areas, leading to negative impacts on landscape character, or lead to coalescence of settlements, harming their identity. However, the Green Belt would continue to provide protection against urban sprawl.</p> <p>A Local Plan provides the opportunity to minimise these potential effects and to improve linkages between areas of open space, parks and the open countryside.</p>	<p>SA objective 4.4 SA objective 4.5</p>
Biodiversity		
<p>In 2000, the Government set a target of getting 95% cent of all SSSI land in England into a healthy or improving condition by 2010. Two of the five SSSIs in the Borough are in favourable condition, while the other three meet the Government's target for 95% of SSSI land (by area) to be 'in healthy or improving condition'.</p>	<p>The NPPF (paragraph 7) states that the planning system has a key environmental role including, <i>"contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity..."</i> and should support a move away from a net loss of biodiversity to achieving net gains for nature and biodiversity where possible (paragraphs 9 and 109).</p>	<p>SA objective 4.6 SA objective 4.7 SA objective 4.8</p>

⁷ <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2014>

Key issues	Likely evolution without the Local Plan	Relevant SA objective
<p>Biodiversity in the Borough is under pressure from both existing and future potential development and from climate change. Impacts on biodiversity arise from:</p> <ul style="list-style-type: none"> • Recreational pressures as the existing green spaces in towns and villages in Welwyn Hatfield are replaced by housing or sites of national and local importance outside towns (Welwyn Garden City and Hatfield) and villages (Cuffley and Woolmer Green) come under pressure from encroachment from residents in new developments. • Pressure upon water resources from physical modification, pollution from waste and pollution from rural areas were found to be the top three issues for the water environment in the catchment area covering Welwyn Hatfield. Rye Meads Sewage Treatment Works is at/near capacity and could have adverse impacts on biodiversity, and in particular Natura 2000 sites as well as the delivery of housing sites if overloaded. • Direct loss and / or fragmentation of habitats. Welwyn Hatfield is likely to experience a growth in housing developments in villages and the Green Belt and requires more housing and infrastructure to meet current and future demand. 	<p>Therefore, even without the new Local Plan this issue is being addressed to some extent by national planning policy as well as legislative protection outside of the planning system. However, given the current pressures for growth and development within the Borough, an up-to-date Local Plan can help to conserve and enhance biodiversity by directing development away from sensitive locations and managing new development so that its design minimises effects on the natural environment and helps to create and connect habitats.</p>	
<p>Historic environment</p>		
<p>Welwyn Hatfield has a rich heritage, including scheduled monuments and listed buildings, archaeological interest, architectural interest, and Welwyn Garden City as a prime example of the 'garden city movement'. Therefore the character of the Borough, its historic environment, heritage assets and their settings, need to be maintained to retain a sense of place and local distinctiveness.</p>	<p>Continued development pressure means that the risk of harm to heritage assets would be likely to continue and may be exacerbated without a planned local approach to development.</p> <p>National protection is afforded by various strategies, policies and permitting arrangements as well as the NPPF. Paragraph 17 of NPPF states that the planning system should <i>"conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations"</i>.</p> <p>Whilst these make provision for the protection of the historic environment, implementation of locally specific policies through the new Local Plan provides the opportunity to steer development away</p>	<p>SA objective 4.5</p>

Key issues	Likely evolution without the Local Plan	Relevant SA objective
	<p>from sensitive assets.</p> <p>The Local Plan also affords opportunities for enhancement, for example bringing unused old buildings into appropriate new uses or improving the condition and addressing detracting elements of conservation areas.</p>	
Air quality		
<p>Measured air quality in Welwyn Hatfield currently meets the national standards. However, the percentage of deaths attributed to particulate air pollution is above the average for Hertfordshire County.</p> <p>Localised junctions and sections of busy roads may negatively affect local habitats and national and locally designated wildlife sites.</p>	<p>Although there are no AQMAs in Welwyn Hatfield, there are in neighbouring authorities, and the increase in traffic in the Borough could lead to air quality issues without timely intervention. Without action from the Local Plan to direct development to sustainable locations and increase provision of sustainable transport infrastructure, the trend for increasing car ownership and travel is likely to continue with associated emissions of air pollutants are likely to increase, affecting the health and wellbeing of local residents and visitors to the Borough.</p> <p>Paragraph 17 of the NPPF states that one of the core planning principles that should underpin plan making and decision making includes action to <i>“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”</i>.</p>	<p>SA objective 1.1</p> <p>SA objective 4.2</p> <p>SA objective 4.3</p> <p>SA objective 4.6</p>
Water resources and water quality		
<p>A number of water bodies in the Borough have been significantly modified, and the Main Rivers in the Borough do not have ‘good ecological status’ as required by the Water Framework Directive.</p> <p>The agricultural, urban transport and the water industry are all identified as the main sectors affecting the quality of the water throughout the Borough.</p> <p>There is significant water management issues that limit the uses and potential benefits of managing the water environment in the river basin district in a sustainable way.</p> <p>Rye Meads sewage treatment works is at/near capacity and</p>	<p>The Environment Agency manages water resources through the Catchment Abstraction Management Strategy (CAMS) process along with abstraction licensing strategies. This provides the approach and framework within which water resources will be managed in the Borough.</p> <p>The production of a Surface Water Management Plan, may offer further management priorities and tasks in relation to the adequate safeguarding and management of surface water.</p> <p>The Local Plan offers the opportunity to ensure that the allocation of development takes into account the CAMS to ensure that water resources in Welwyn Hatfield continue to provide adequate water and</p>	<p>SA objective 4.7</p> <p>SA objective 4.8</p>

Key issues	Likely evolution without the Local Plan	Relevant SA objective
<p>could have adverse impacts on water quality, and the Lee Valley SPA, if it is overloaded.</p>	<p>are of a high quality, while also meeting conservation targets. The Local Plan can also set out development management policies to minimise the risk that development will cause deterioration in downstream water quality.</p> <p>Issues regarding Rye Meads sewage treatment works, and related Lee Valley SPA, would continue to be addressed by the Environment Agency, Thames Water and other local authorities through their planning processes.</p> <p>Pollution from agricultural land uses (e.g. fertiliser use) is beyond the remit of the Local Plan, and is therefore likely to continue without intervention by another means.</p>	
<p>Flood risk</p>		
<p>Although the Borough has relatively few areas within the Environment Agency's medium and high flood risk zones, some areas are still prone to flooding.</p> <p>There will be a need for the Borough to develop suitable flood risk management schemes in coordination with strategic development in the next plan period.</p> <p>Climate change is likely to exacerbate frequency and severity of flooding events.</p>	<p>All development needs to take account of national policy on flood risk, including the NPPF requirement that <i>"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere"</i> (paragraph 100).</p> <p>The severity and likelihood of flooding is likely to increase with climate change. Catchment flood management plans (CFMPs) consider all types of inland flooding (rivers, ground water, surface water and tidal flooding). Hertfordshire County Council's Local Flood Risk Management Strategy (LFRMS) is also a key strategy underpinning flood risk management in the Borough. The Council's own Strategic Flood Risk Assessment assessed the nature of flood risk in the Borough in a more detailed way, including the promoted development sites. The CFMP, LFRMS and SFRA will be used to plan and agree the most effective way to manage flood risk and development in the future.</p> <p>Local authorities are required to take flood risk into account during the plan making and development processes. Without a Local Plan, it will be more difficult to meet the flood risk-related requirements of the NPPF, CFMP and LFRMS.</p>	<p>SA objective 2.2</p>

Key issues	Likely evolution without the Local Plan	Relevant SA objective
Soil		
<p>The Borough has a high proportion of land which is identified as being the best and most versatile agricultural land that has the greatest potential for local food security. Pressure for development of such land could result in the loss of this natural resource.</p>	<p>Continued population growth and economic growth are likely to continue to increase the pressure to develop greenfield sites, with the risk of loss of high quality agricultural land.</p> <p>The NPPF affords some protection to best and most versatile agricultural land, but Local Plan policies can ensure that development on the best and most versatile agricultural land is, where possible, avoided or required to be temporary and reversible. It can also encourage the re-use of previously developed land.</p>	SA objective 4.10
Minerals		
<p>There are significant sand and gravel deposits in the Borough that could be sterilised by development.</p> <p>Welwyn Hatfield contains the mineral safeguarding area Preferred Area 1, which is located at land at the former British Aerospace, Hatfield and buffer zones protecting the amenity, landscape and local communities.</p>	<p>Hertfordshire County Council has a statutory requirement to plan for mineral resources, including the safeguarding of land for mineral extraction. Therefore, in the absence of a Local Plan, minerals planning would still take place.</p> <p>However, a Local Plan provides the opportunity for the Borough to ensure that mineral deposits are not sterilised by development and that new development does not adversely affect essential mineral workings and processes.</p>	SA objective 6.5
Waste		
<p>The level of household waste recycling has reduced from 49.9% in 2011/12 when it was one of the top 10 Local Authorities with the largest increase in recycling to 46.63% in 2013/14. While it has recovered to 48% in 2014/15, there is a need to keep reducing the rate in order to ensure the County continues to meet the 2020 target of 50%.</p> <p>The Borough has one of the highest levels of collected household waste per person in the County and although the latest figures show that this has decreased in recent years from 384 kg in 2011/12 to 381 kg per head in 2014/15, it is still amongst the highest collected household waste per person levels within the County.</p>	<p>Hertfordshire County Council has a statutory requirement to plan for waste facilities, including the safeguarding of land for waste management and recycling. Therefore in the absence of a plan, waste planning would still take place.</p> <p>However, a Local Plan provides the opportunity for the Borough to ensure that it is helping to meet the objectives and targets set at a County level. For example, it could include policies on the design of new housing and employment facilities to ensure waste generation is minimal and there is adequate storage and recycling facilities available, and to ensure that development proposals do not adversely affect essential waste management facilities and proposals.</p>	SA objective 4.9

4 SA Framework

The SEA Regulations, Schedule 2(6) require the Environmental Report to consider:

The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects, on issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the inter-relationship between the issues referred to in sub-paragraphs (a)–(l).

- 4.1 The development of a set of SA objectives is a recognised way in which the likely environmental and other sustainability effects of a plan can be described, analysed and compared. The SA has therefore taken an 'objectives-led' approach to the assessment i.e. the Welwyn Hatfield Local Plan policies and allocations have been assessed in relation to a framework of sustainability objectives and supporting assessment criteria (known as the 'SA Framework').
- 4.2 The SA Framework was first developed using information derived from the policy, plan and programme review, and the analysis of the baseline economic, social and environmental conditions of the Borough as described in **Chapter 3**. A check was also made against Schedule 2 of the SEA Regulations to ensure that all SEA topics were covered.
- 4.3 For the over-arching SA objectives, LUC used the six long term objectives of the Borough's Corporate & Community Plan 2015 originally published in 2007⁸. This was because the Corporate & Community Plan had already been the subject of public consultation, and was an agreed statement of what the Borough aims to achieve in sustainability terms. Although the Corporate & Community Plan has since been withdrawn and replaced by the Sustainability Community Strategy⁹ and the Business Plan¹⁰, it was considered that for the purposes of SA the six long term objectives remained relevant.
- 4.4 For the SA criteria or sub-objectives, a series of questions were developed under each of the SA objectives. These questions were used to as reference points to determine whether the Local Plan strategy, policy and proposal options are likely to be achieved.
- 4.5 The SA Framework was tested at an SA Scoping Workshop in February 2008, and as a result a number of amendments, additions and deletions were made. As a result of suggestions at the Workshop, it was decided that the criteria/questions needed to be made as simple and understandable as possible. It was agreed that the criteria/questions should focus on sustainable outcomes (i.e. where we want to get to) rather than the processes and mechanisms for achieving sustainable outcomes (i.e. how we get there). This was because it is for Local Plans to decide how to achieve sustainable outcomes, and it is the role of the SA to determine whether the Local Plan is likely to achieve the sustainable outcomes or not.
- 4.6 The SA Scoping Report was formally consulted upon in from March to May 2008, and has been kept up-to-date to reflect changes in policy and baseline context, including a further consultation in August 2014.
- 4.7 The current SA Framework is shown in **Table 4.1**. The SA objectives and questions in Column 1 of the SA Framework have remained the same throughout the Local Plan preparation process for consistency purposes and because they have remained relevant throughout the SA. There is no evidence to suggest that any changes needed to be made to the SA objectives and consultees have agreed that it has remained fit for purpose.
- 4.8 Key changes to the questions (Column 2) have included:

⁸ Welwyn Hatfield 2015: The Borough's Corporate and Community Plan (Welwyn Hatfield Borough Council, 2007)

⁹ Welwyn Hatfield Sustainable Community Strategy 2015-2020

¹⁰ Welwyn Hatfield Business Plan 2015-2018

- Deletion of references to the East of England Plan (because it has been revoked) and replaced with reference to the Borough's objectively assessed housing need, a requirement of the NPPF.
 - Deletion of reference to the Code for Sustainable Homes, which was withdrawn by the Government in April 2015, and replaced by new national technical standards.
- 4.9 When applying the SA Framework to potential housing and employment land allocations, a series of assumptions were set out for each SA objective to show how the effects will be identified and evaluated for each site option appraised. These were consulted upon the additional Scoping Report (August 2014), and consultees' responses taken into account in making refinements to the assumptions. The SA assumptions are presented in **Appendix 2**.
- 4.10 Each policy and site allocation option, including the overall spatial strategy and levels of growth, was assessed against each SA objective, and a judgement will be made as to the likely effect of the option on the objective using the assumptions listed in the SA Framework. These judgements differentiated between significant effects and other more minor effects through the use of colour coded symbols, as shown in the key below. Mixed effects were recorded for an SA objective where there is potential for positive effects in relation to one sub-objective but potential for negative effects in relation to another.
- 4.11 Each policy option was assessed against each SA objective, and a judgement was made with regards to the likely effect that the option would have on that objective. These judgements were recorded as a colour coded symbol, as shown below in **Figure 4.1** below.

Figure 4.1: 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 ¹¹
?	Likely effect uncertain
N/A	Policy is not relevant to SA objective

¹¹ There may be a need to distinguish further between mixed effects which will be addressed in the appraisals

Table 4.1: Welwyn Hatfield SA Framework

Will the plan, policy or proposal...	What will the SA look for in the Local Plan? * Questions of particular relevance to the statement on equalities and diversity	SEA Topic
Long-term Objective 1: Health improvement		
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	<p>[This should be achieved through positive assessments against criteria 2.1, 2.2, 3.1, 4.1 to 4.6, 4.8, 4.9, 5.1, 6.1 to 6.4, and 6.6.]</p> <ul style="list-style-type: none"> In particular, the SA will look for proposals that will improve opportunities for non-car access to jobs, education, formal sport facilities, informal recreation especially green space and play areas, community facilities for young people, health and cultural facilities, and that lead to improvements in the built and natural environment of those communities most characterised by poor health. 	<ul style="list-style-type: none"> Human health Population
...lead to improved health for all? (1.2)	<ul style="list-style-type: none"> As above, but also taking into account the needs of particular sectors of the community, such as the increasing elderly population, people with disabilities, ethnic minority groups, and young people including the growing number of students*. 	<ul style="list-style-type: none"> Human health Population
Long-term objective 2: Safer communities		
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	<ul style="list-style-type: none"> Policies and development proposals that design out crime. Policies and proposals that provide for an appropriate mix of uses. Policies and proposals that increase community, leisure and recreational facilities, particularly for young people, and especially in more deprived parts of the Borough*. 	<ul style="list-style-type: none"> Population Human health
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	<p>[Flooding is not a major issue in the Borough, but could increase with climate change and pressure on surface water drainage systems.]</p> <ul style="list-style-type: none"> Avoidance of inappropriate development in flood risk areas. Avoidance of development that will increase flood risk elsewhere. Promotion of sustainable drainage systems including where necessary strategic flood storage areas. That the capacity of the surface water drainage systems is capable of accommodating more development. 	<ul style="list-style-type: none"> Population Human health
Long-term Objective 3: Good citizenship		
...encourage involvement of the public in the planning	<ul style="list-style-type: none"> Encouragement for local people to engage effectively in development plan preparation (e.g. in Area Action Plans), especially underrepresented or 'hard to reach' groups, identified in the Statement of Community Involvement as young people, ethnic minorities, and sections 	<ul style="list-style-type: none"> Population

Will the plan, policy or proposal...	What will the SA look for in the Local Plan? * Questions of particular relevance to the statement on equalities and diversity	SEA Topic
process? (3.1)	<p>of the community living in the rural areas or more deprived areas of the Borough *.</p> <ul style="list-style-type: none"> • Encouragement for developers to consult at an early stage local people who may be affected (beneficially or otherwise) by development to ensure community concerns are taken into account during the planning and design stages. 	
Long term objective 4: Improving the environment		
...significantly reduce greenhouse gas emissions from built development? (4.1)	<ul style="list-style-type: none"> • Promotion of energy efficiency in housing development. • Promotion of energy efficiency in non-housing development, energy efficiency to be achieved through a combination of use of materials and design, orientation, etc. • Clear guidelines and support for renewable energy sources, such as wind, micro-generation, ground sourcing, biomass, combined heat and power, district heating. 	<ul style="list-style-type: none"> • Climatic factors
...significantly reduce greenhouse gas emissions from transport? (4.2)	<ul style="list-style-type: none"> • Delivery of housing close to existing and proposed employment and vice versa, based on a good understanding of travel to work patterns. • Promotion of car free development, home zones, car clubs, more energy efficient choices of transport, and restraints on unnecessary car use. • Distance to, and ease of non-car access to schools, colleges, health facilities, shops, sports, places of worship, pubs, cultural and other community services and facilities (including integrated facilities), plus concentration of facilities on public transport corridors, and integrated with walking and cycling networks, and provision of home services. • Promotion of tele-working, travel plans, and reduced parking at business premises. • The right type of retail and community facilities in the right locations according to identified need and settlement role and function. • Promotion of significantly improved east/west sustainable modes of transport. 	<ul style="list-style-type: none"> • Climatic factors
...avoid and reduce air pollution? (4.3)	<p>[Air quality is not a major issue in Welwyn Hatfield, but could become so if traffic continues to increase, – therefore look for the same sort of issues as for criterion 4.2. It is also a topic in the SEA Directive and for the regional as a whole has been identified as a potential issue with respect to biodiversity, especially Natura 2000 sites]</p> <ul style="list-style-type: none"> • Policies that encourage tree planting (as natural cleanser of air). 	<ul style="list-style-type: none"> • Air
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	<ul style="list-style-type: none"> • Positive design policies for built development that respect village character (including use of local materials/vernacular). • Avoidance of 'sub-urbanisation'. • Support for employment linked to land management. • Meeting Natural England's accessible natural greenspace standards, including provision of a network of greenspace in settlements in close proximity to where people live, with green corridors and woodland, and links to surrounding countryside (green infrastructure). • Minimisation of noise and light pollution from development. 	<ul style="list-style-type: none"> • Landscape • Cultural heritage including architectural and archaeological heritage

Will the plan, policy or proposal...	What will the SA look for in the Local Plan? * Questions of particular relevance to the statement on equalities and diversity	SEA Topic
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings? (4.5)	<ul style="list-style-type: none"> • Development and policies that safeguard archaeological sites (including scheduled ancient monuments), conservation areas, historic settlement cores, listed buildings, parks and gardens, etc., including their setting, improving access and interpretation, and promotion of heritage-led regeneration. • Positive design policies for built development that respect town character (including use of local materials/vernacular), for example where relevant to the 'garden city'. • Reassurance that development will be adapted to deal with extreme weather events. • Improvements to the public realm including green infrastructure, greenspace, tree planting/shading, safe walking and informal recreational areas, especially in more deprived neighbourhoods*. 	<ul style="list-style-type: none"> • Landscape • Cultural heritage including architectural and archaeological heritage
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	<ul style="list-style-type: none"> • Protection for internationally, nationally, regionally and locally designated sites and species. • Positive proposals for achieving biodiversity action plan targets, taking into account the need to link habitats to allow species to migrate (e.g. wildlife corridors, etc.). • Ensure in particular that the integrity of the Special Protection Area at Rye Meads is not compromised by development proposals affecting the treatment works. 	<ul style="list-style-type: none"> • Biodiversity • Flora • Fauna
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	<ul style="list-style-type: none"> • Promotion of water efficiency (e.g. above the minimum standards required within the Building Regulations in accordance with National Planning Practice Guidance advice), including re-use and recycling. 	<ul style="list-style-type: none"> • Water
...avoid water pollution? (4.8)	<ul style="list-style-type: none"> • Ensuring there is sufficient capacity in the sewage treatment works and general water infrastructure to cope with additional development without adverse effects on the environment. • Use of natural treatment systems (e.g. reed beds). • Avoidance of development that could adversely affect groundwater sources. 	<ul style="list-style-type: none"> • Water
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be	<ul style="list-style-type: none"> • Maximum re-use of construction and demolition materials in construction, refurbishment rather than new build where in accordance with wider sustainability objectives (e.g. energy conservation, quality of built environment, etc.). • Provision for composting, re-use and recycling in new development, including easily accessible community facilities. 	<ul style="list-style-type: none"> • Material assets¹²

¹² 'Material assets' are not defined in the SEA Directive, but we understand this term to mean the value of past human investment in the built environment including major infrastructure – this would include, for example, housing, industry, transport infrastructure etc. So the SEA would need to consider whether the plan would affect such past investment (e.g. would it result in a loss of a major industrial site, or the demolition of a lot of housing, etc.).

Will the plan, policy or proposal...	What will the SA look for in the Local Plan? * Questions of particular relevance to the statement on equalities and diversity	SEA Topic
reduced? (4.9)		
...promote the conservation and sustainable use of productive agricultural land and maximise use of previously developed land? (4.10)	<ul style="list-style-type: none"> • Development of brownfield sites where these can support wider sustainability objectives (e.g. reduce travel by car, improve public realm, avoid loss of biodiversity interest, gardens, etc.). • Ensure necessary development of greenfield land fully takes into account existing or potential contribution for biodiversity, flood storage and management, aquifer recharge, sustainable food/biomass production, recreation and health, and mitigate, compensate, enhance as appropriate. • Avoidance of development on best and most versatile agricultural land (grades 1, 2 and 3a). 	<ul style="list-style-type: none"> • Soil • Material assets
Long-term Objective 5: Decent housing		
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	<ul style="list-style-type: none"> • Delivery objectively housing need. • Appropriate provision for affordable, social, intermediate and key worker housing, plus policies to ensure certainty of delivery. • Appropriate provision for students*. • Provision for lifetime homes to meet needs of an ageing population*. • Appropriate provision for Gypsies and Travellers*. 	<ul style="list-style-type: none"> • Population
Long-term objective 6: A thriving economy		
...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)	<ul style="list-style-type: none"> • Support in particular for knowledge-based sector (including high-tech and business services). • Also support for key public services (e.g. health, administration, education). • Encouragement for micro businesses, SMEs etc. • Support for local trading schemes. • Encouragement for greener business practices, such as reduced travel, reduced waste, environmental technologies, etc. • Economic activity that capitalises on links to London and King's Cross/St Pancras. • Allowing business expansion without compromising objectives of the Green Belt. 	<ul style="list-style-type: none"> • Population • Material assets • Biodiversity • Landscape • Climatic factors • Air • Water
...encourage economic investment in those areas most in need of regeneration, in a way that will benefit those most in need of rewarding	<ul style="list-style-type: none"> • Targeted regeneration and improvements to public realm and sustainable transport networks of particularly affected wards in Hatfield and Welwyn Garden City centres. 	<ul style="list-style-type: none"> • Population • Material assets

Will the plan, policy or proposal...	What will the SA look for in the Local Plan? * Questions of particular relevance to the statement on equalities and diversity	SEA Topic
employment? (6.2)		
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	<ul style="list-style-type: none"> • Provision for retail outlets as identified by technical research. • Improvements to the public realm of the town centres, including improved access by foot, cycle and public transport. • Policies and proposals that encourage living within the town centres. 	<ul style="list-style-type: none"> • Population • Material assets
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	<ul style="list-style-type: none"> • Support for economic development that is appropriate for rural locations, including small-scale or home-based. • Particular support for economic activity linked to land management, village services, etc. • Avoidance of economic activity that will generate large numbers of car trips, or that cannot be supported by alternative modes of transport. • Initiatives that add value to rural products, development of farmers' markets and small-scale rural craft businesses, re-use of redundant farm buildings. 	<ul style="list-style-type: none"> • Population • Material assets
...avoid the sterilisation of mineral resources? (6.5)	<ul style="list-style-type: none"> • Avoidance of development on mineral reserves (e.g. sand and gravel) that may be needed for future use. 	<ul style="list-style-type: none"> • Population • Material assets
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	<ul style="list-style-type: none"> • Close proximity of, and ease of access to, schools, colleges, libraries, etc, centres of excellence, particularly in relation to young people in parts of Welwyn Garden City and Hatfield, where skills levels are lowest*. 	<ul style="list-style-type: none"> • Population • Material assets

5 Evolution of the Local Plan

Regulation 12(2) of the SEA Regulations requires that:

“The report shall identify, describe and evaluate the likely significant effects on the environment of :

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”

Schedule 2(8) requires the Environmental Report to describe:

“An outline of the reasons for selecting the alternatives dealt with”

Introduction

- 5.1 This chapter of the SA Report provides a description of the evolution of the Local Plan, from Issues and Options to the Proposed Submission Local Plan. It sets out the key stages of plan preparation and includes a discussion of the strategic options considered in order to inform the Proposed Submission Local Plan. It focuses on the overall strategy of the Local Plan, the strategic policies intended to plan for and deliver an appropriate level of growth, and the spatial strategy which identifies the planned focus and distribution of development across the Borough.
- 5.2 The SA Findings for the Proposed Submission Local Plan follow in **Chapter 6**.

Key Stages of the Local Plan

- 5.3 Work on the Local Plan and SA began in 2007 with evidence based work and collaborative SA Scoping to agree the key sustainability issues and set the Framework for appraisal (see Chapter 2).
- 5.4 The main consultation stages of the Local Plan are set out below:
- **2009 Issues and Options Report** (incorporating SA). Key issues and options on which views were sought included how best to protect the environment and address climate change, how to raise quality of life and ensure communities are sustainable, and how to make provision for the required levels of growth (including 10,000 homes, the Regional Spatial Strategy (RSS) target). Strategic and more detailed policy options were put forward, along with potential broad locations for growth. The sustainability advantages and disadvantages of each option were reported within the Issues and Options Report. Consultation took place in March-May 2009¹³.
 - **2011 Housing Targets Consultation: How Many Homes?** This consultation sought views on five high level housing targets. It followed the deletion of the RSS housing target in relation to Welwyn Hatfield, and the move to revoke RSS. The consultation was accompanied by a SA of Alternative Housing Targets (Spring 2011), a high level appraisal of the five housing targets, setting out the sustainability advantages and disadvantages of each target. Consultation took place in June-July 2011¹⁴.
 - **2012 Emerging Core Strategy**, accompanied by a SA Report (September 2012). The overall strategy for the Emerging Core Strategy (ECS) was based on planning for a level of

¹³ <http://www.welhat.gov.uk/article/763/Core-Strategy-Issues-and-Options>

¹⁴ <http://www.welhat.gov.uk/homes>

growth which it was considered met the needs of the Borough but recognised environmental and infrastructure constraints. It sought to protect areas of highest environmental value and community facilities and services and promoted good design which incorporates sustainability measures. The ECS set out a spatial strategy for the period of 2001-2029 and 20 strategic policies. The ECS included a housing target of 6,800 homes to be delivered through two 'Broad Locations for Growth', one north west of Hatfield, and one north east of Welwyn Garden City, and additional sites to be allocated through a Site Allocations document. Policies CS1 to CS4 set out the overall strategy for growth and its distribution and the approach to growth in the Green Belt. Policies CS5 to CS12 set out the approach for retailing, community, facilities, housing, employment, design, and the protection of historic and environmental assets. The spatial policies set out specific policies for different parts of the Borough - Policies CS13 to CS15 for Welwyn Garden City, Policies CS16 to CS19 for Hatfield and CS20 set out the approach for the villages and rural areas. Consultation took place in November 2012-January 2013¹⁵.

- **2012 Land for Housing Outside Urban Areas Consultation.** This consultation took place alongside the Emerging Core Strategy consultation. It identified opportunities for potential housing allocations around Welwyn Garden City and Hatfield, and sought views on whether the identified sites would be the most suitable locations when compared with reasonable alternatives. This would inform a forthcoming Site Allocations Document. Opportunities for potential allocations included smaller sites than the proposed broad locations (and reasonable alternatives) considered in the SA of the ECS, and would be subject to SA as the Site Allocations DPD progressed. Consultation took place in November 2012-January 2013¹⁶.
- **2015 Local Plan Consultation Document** accompanied by SA Findings (SA Report December 2014). Following publication of the NPPF, the Council decided to progress a Local Plan instead of a Core Strategy. The 2015 Local Plan Consultation Document explained that the Local Plan would combine the strategic policies of the ECS with site allocations and development management policies. A review of the evidence for growth, and the identification of a higher objectively assessed need for housing (around 12,500 homes over 20 years) meant some major changes were required to strategic policies, both in terms of how much growth would be accommodated, and its distribution, and these were set out in the consultation. The consultation sought views on additional housing sites, and sites for Gypsies and Travellers. Sites were categorised as 'more favourable', 'finely balanced' and 'less favourable'. New site allocation options were also included for employment land, cemeteries and a major developed site in the green belt, as well as protective designations for retail centres and urban open land. A list of the proposed development management policies setting out the intent and general criteria for assessing planning applications was also provided in the consultation. Consultation took place in January – March 2015¹⁷.

5.5 Consultation comments on the ECS and subsequent stages of the plan have tended to focus on the overall level of growth, spatial strategy, individual broad locations for growth and potential site allocations. There was broad support for the overall strategy of the plan, and for strategic topic based policies, which have been taken forward into the Local Plan Consultation Document.

5.6 Consultation comments received on the SA Reports, and how they have been responded to, are included in **Appendix 1**.

5.7 Reference is made in this chapter to the SA Reports accompanying the earlier stages of the plan, which can be found at the links to the plan consultations in the footnotes below:

- SA Report September 2012, which accompanied the 2012 Emerging Core Strategy Consultation.
- SA Report December 2014, which accompanied the 2015 Local Plan Consultation Document.

¹⁵ <http://www.welhat.gov.uk/article/4616/Emerging-Core-Strategy>

¹⁶ <http://www.welhat.gov.uk/article/4616/Emerging-Core-Strategy>

¹⁷ <http://www.welhat.gov.uk/localplan>

The Proposed Submission Local Plan

5.8 The Proposed Submission Local Plan comprises:

- An Overarching Strategy comprising the Vision and Objectives; Strategic Policies SP 1 to SP 3 on Delivering Sustainable Development, Targets for Growth, and Settlement Strategy and Green Belt Boundaries; a Development Management Policy for Windfall Development (SADM 1); and a Key Diagram.
- Topic Specific strategic and development management policies covering Transport and Travel; Centres, Services and Facilities; Housing; Economy; Quality of New Development; Environmental Assets; and Infrastructure (Strategic Policies SP 4 to SP 14; Development Management Policies SADM 2 to SADM 18).
- Settlement Policies are provided for Welwyn Garden City and Hatfield, the larger villages, proposed new village and rural areas (SP 14 to SP 26 and SADM 19 to SADM 35).
- The Proposed Submission Local Plan also includes a section on Implementation and Monitoring.

Vision and Objectives

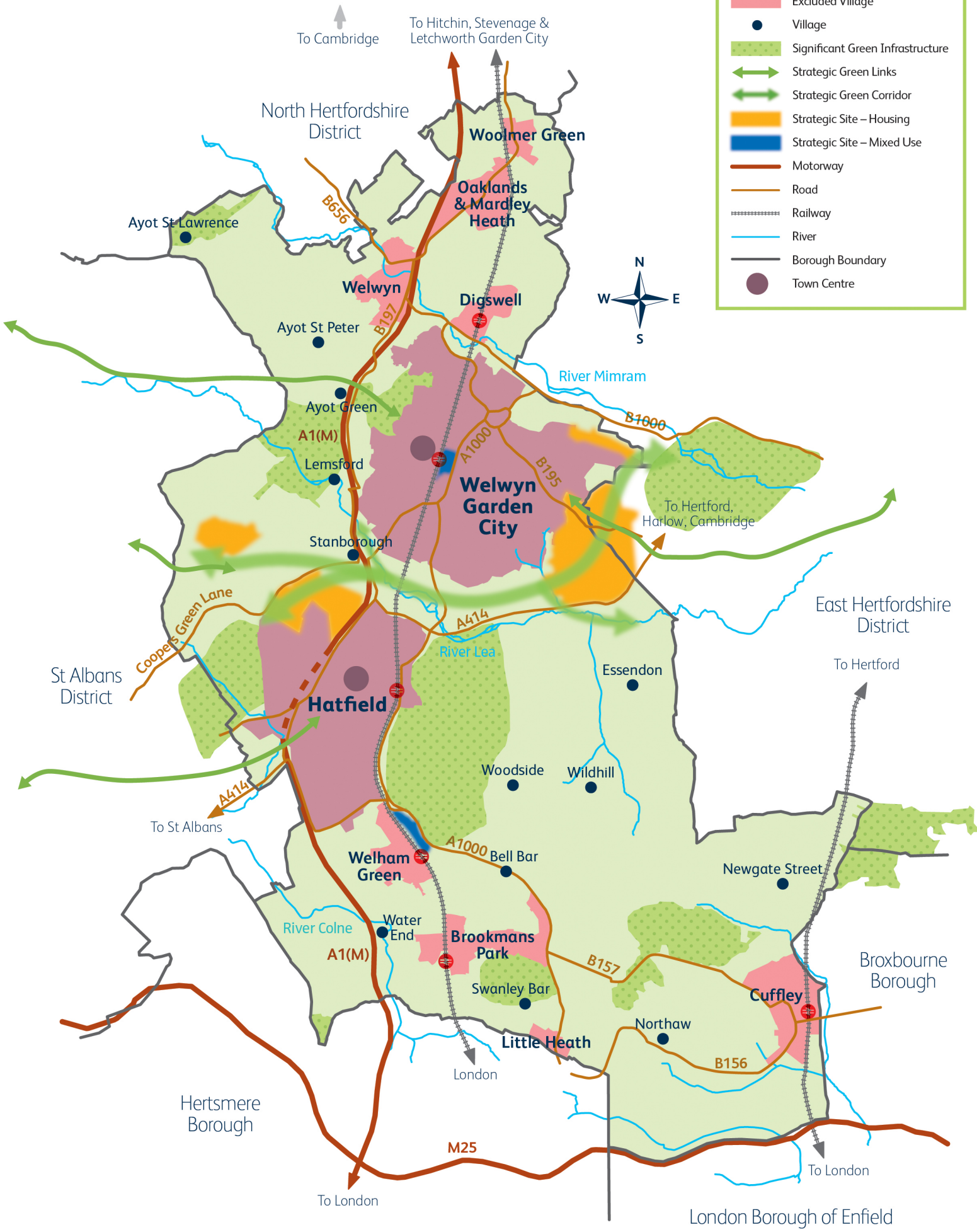
5.9 The Vision for the Proposed Submission Local Plan is summarised below:

- In 2032 Welwyn Hatfield will be a vibrant and culturally rich place where people choose to live, work and spend their leisure time.
- Welwyn Garden City and Hatfield will continue to be the main focus for shopping, leisure, housing and employment opportunities with the larger villages will continue to be the centres for local shops, services and community facilities for their parish areas. The Borough will have a prosperous local economy, which makes best use of its links to London and Cambridge and the benefits associated with being the centre for higher education in the county.
- Two thirds of the approximately 12,000 new homes will be provided within and around Welwyn Garden City and Hatfield, with a new village of 1,100 homes proposed to the north west of Hatfield, and more limited development within and around the villages (with a focus on the larger villages). Planned Green Belt releases will provide for 6,200 homes which cannot be accommodated within existing settlements.
- Employment land will be provided within existing employment areas and at a new life sciences park at Marshmoor, Welham Green.
- Partnership working will ensure the delivery of the necessary supporting infrastructure, including new and improved strategic green infrastructure, to improve access and biodiversity and reinforce the role of the Green Belt between Hatfield and Welwyn Garden City and surrounding towns.
- Partnership working will also support the economy of the main towns, ensuring Welwyn Garden City continues to be an attractive centre for shopping, business and investment, and that Hatfield town centre is regenerated.
- The Garden City and New Town heritage, attractive spaces, and patterns of land use will be supported and reinforced, along with the distinctive character of the villages, in bringing forward well designed developments, with strategic sites masterplanned along garden city principles.
- The quality and attractiveness of the countryside for farming, recreation and as a habitat for wildlife will be reinforced. The natural and historic environment in both urban and rural areas will be protected, maintained and enhanced.
- The Borough will play its part in addressing climate change by improving opportunities for travelling by public transport, walking and cycling, using natural resources more efficiently, securing high quality sustainable design and managing the risk of flooding.

Key Diagram Welwyn Hatfield

KEY

- Green Belt
- Town
- Excluded Village
- Village
- Significant Green Infrastructure
- Strategic Green Links
- Strategic Green Corridor
- Strategic Site – Housing
- Strategic Site – Mixed Use
- Motorway
- Road
- Railway
- River
- Borough Boundary
- Town Centre



- 5.10 The Vision is translated into Borough-wide Objectives for the Local Plan:
1. *To provide for the Borough's development needs over the plan period, in a form which maintains the existing settlement pattern, protects areas of highest environmental value, prevents coalescence of our towns and villages and releasing a limited amount of land from the Green Belt to ensure that its boundaries will not need reviewing before 2032.*
 2. *To deliver a sustainable pattern of development by directing the majority of new development to the main towns and limited development to the excluded villages where it can be supported by appropriate infrastructure, the need to travel is minimised and opportunities for redevelopment on previously developed land can be maximised.*
 3. *Working in partnership with service providers and others to deliver mixed and sustainable communities which are well planned, healthy, active, inclusive and safe, environmentally sensitive, accessible, culturally rich, vibrant and vital, well served, built to high design standards reflecting local character and fair for everyone.*
 4. *To support and reinforce the role of the Borough's villages and neighbourhoods and create new sustainable neighbourhoods.*
 5. *To reduce people's impact on the environment by reducing the need to travel, through the prudent use of natural resources, through minimising waste, by managing the risk of flooding and by designing development to take into account future changes to the climate.*
 6. *To maximise the opportunities to travel by sustainable transport modes and manage parking demand.*
 7. *To provide an adequate supply and mix of housing types and tenures.*
 8. *To protect, maintain and where possible enhance the Borough's historic and natural environment, its cultural assets and network of open spaces, urban and rural landscapes.*
 9. *To enhance opportunities for and access to recreation, heritage, arts and cultural activities and improve green links both within and between urban and rural areas.*
 10. *To sustain the vitality of our villages and the rural economy, maintaining a supply of land for agriculture and for other uses appropriate to the countryside.*
 11. *To maintain and enhance the vitality and viability of our town, neighbourhood and village centres.*
 12. *To enable Welwyn Garden City and Hatfield to fulfil their role as the main centres of economic activity in the Borough, working in partnership with relevant bodies to support growth in the local economy and lifting areas out of deprivation by providing opportunities to improve training, education, health and economic prosperity.*
 13. *To work with and support locally established companies, employers and higher education providers to encourage new investment in the Borough.*
- 5.11 At Issues and Options stage for the Emerging Core Strategy (2012), no alternative visions were put forward. However, consultees were invited to suggest any alternatives to the vision proposed. WHBC state within the Proposed Submission Local Plan that in developing the vision they have had regard to the Council's aspirations set out in its Business Plan, the Strategic Economic Plan produced by the Local Enterprise Partnership and the results of previous consultations.
- 5.12 For the Borough-wide strategic objectives, the Issues and Options for the Emerging Core Strategy did not put forward any alternative objectives but, as with the Vision, invited consultees to suggest any additions, deletions or amendments to those proposed. The Spatial Vision in the Proposed Submission Local Plan is more detailed than that set out within the Emerging Core Strategy, including numerical values for new homes.
- 5.13 At Issues and Options stage, the SA tested the proposed Strategic Objectives for consistency with the SA Objectives. Areas of potential synergy or inconsistency between the SA Framework Objectives and the Emerging Core Strategy Objectives were identified and summarised in the Emerging Core Strategy SA Report (2012).

How Much Growth and Alternative Growth Scenarios

Growth Options and Alternatives

- 5.14 The Proposed Submission Local Plan supports levels of employment, housing and retail growth as set out in Policy SP 2 which are consistent with the vision and objectives and the principles of sustainable development set out in Policy SP 1.
- 5.15 This section considers the evolution of the plan with reference to the strategic alternatives considered in relation to the amount of housing, employment and retail growth. There is a particular focus on housing, as it is the need to accommodate growth in housing (aligned with employment growth), and decisions on how much growth to plan for, which has determined the spatial strategy for the plan.

How Much Housing Growth

Issues and Options Stage 2009

- 5.16 The focus here is on the alternative growth scenarios for housing, but this is interlinked with the need for growth in other land uses, in particular, employment uses (as explored in *Housing Background Paper Part 1 – Objective Assessment of Housing Requirements*), and commercial/retail uses. However, the identified need for employment land at the Issues and Options Stage could be accommodated on existing sites without the need for a Green Belt review, so the main focus was on the need to accommodate housing growth, as this had a spatial implication which went beyond the current urban areas and, therefore, wider implications for the SA.
- 5.17 At the Issues and Options Stage, the housing target was derived from the East of England Plan (10,000 homes to 2031). However, following a legal challenge, the part of the East of England Plan identifying a housing target for Welwyn Hatfield was quashed. Subsequently, the government announced its intention to revoke all Regional Strategies. A local target was therefore sought to replace the regional target.

'How Many New Homes?' Housing Targets Consultation, June-July 2011

- 5.18 In June and July 2011, the Council invited views on how many new homes should be built in the Borough between 2011 and 2031. Five alternative targets were set out in a consultation leaflet, together with a summary of the advantages and disadvantages of each target identified through a sustainability appraisal. These were supported by published matrices for each alternative, which had been subject to a high level appraisal against the SA framework.
- 5.19 The sustainability of housing developments depends much on where they are located, how they are combined with complementary land uses, and how developments are implemented. The 'high level' appraisal of the Housing Scenarios considered the strategic issues rather than those relating to specific sites. It assumed that increased investment in housing would be accompanied by investment in employment site delivery, supporting infrastructure including public transport, retail and other commercial development and the increased availability of employment opportunities.
- 5.20 The consultation was informed by a paper setting out, amongst other things, the Council's review of research on sustainable neighbourhood planning, in particular the number of homes required to support the provision of new services (concluding that 1,500 dwellings was a reasonable assumption in this respect), along with the capacity of broad locations for growth around the towns and villages and referred to in the Issues and Options consultation¹⁸.
- 5.21 The consultation sought views on five alternative targets for housing growth between 2011-2031:
- (1) 2,925 (focus on urban capacity).
 - (2) 5,800 (a continuation of the Borough's provisional housing target and the Option 1 target from the Draft review of the East of England Plan >2031).

¹⁸http://consult.welhat.gov.uk/portal/planning_policy/core_strat/csht?tab=files

- (3) 7,600 (a continuation of the long term delivery trend).
 - (4) 10,000 (the pre-legal challenge East of England Plan 2008 target and the basis for the Issues and Options Paper in 2009).
 - (5) 14,400 to reflect government estimates for household growth.
- 5.22 The summary SA commentaries are provided for each target, in Section 7 of the 2012 SA Report (para. 7.9-7.29) followed by the main reasons why each option was taken forward or rejected.

Alternative Target Scenarios

- 5.23 Further technical work was carried out following the publication of the 'How many new homes?' consultation to establish the evidence base for a locally derived target, based on a range of scenarios relating to demographic projections, economic forecasting, affordability indicators, previous delivery trends, the regional spatial strategy and urban capacity estimates, as well as infrastructure considerations. A total of 24 scenarios were reported in *Housing Background Paper Part 1* to the ECS¹⁹.
- 5.24 The 24 scenarios included five scenarios consulted upon in the 'How Many Homes?' Growth Scenarios Consultation, June-July 2011 (see above for target figures).
- 5.25 Other scenarios considered comprised demographic scenarios based on the East of England Forecasting Model and Greater Essex Demographic Forecasts, economic or employment based scenarios, and affordability based scenarios.

Emerging Core Strategy 2012: Emerging Policy CS2 and SA Findings

- 5.26 Policy CS2 of the Emerging Core Strategy (ECS) aimed to meet the needs for growth in relation to housing, employment land and retail floorspace, which were consistent with the Core Strategy's vision, objectives and the principles of sustainable development (CS1). The policy aimed to support economic growth and maintain the current balance between jobs and homes in the Borough, stating that 308ha employment land would be identified, along with opportunities to deliver 7,200 net additional dwellings over a 18 year period from 2011 to 2029 (8,000 over 20 years, 6,000 over 15 years), and 19,228 square metres (gross) additional retail floorspace by 2029 to meet predicted expenditure growth. The council would also resist any net loss in the stock of existing dwellings, allocated employment land and retail floorspace in the Borough's towns, neighbourhood and village centres.
- 5.27 The SA found that both significant positive and significant negative effects were likely to result from ECS Policy CS2 (see SA Report 2012, para. 7.42-7.49).

Reasons for Choice of Housing Target for the ECS

- 5.28 The housing target that was selected by the Council in the ECS was at the lower end of the range of scenarios considered. It therefore risked not delivering the amount of housing (including affordable housing) that was needed in the Borough, although the Council was of the view that economic uncertainties required a cautious approach to be adopted, whilst ensuring that the current alignment between jobs and homes is maintained. The Council considered such a scale of housing and related development not to be insignificant. It would have resulted in an increase of 15.7% in the housing stock of the Borough over the 18 year period (17.4% over the 20 year period). This in turn would be likely to have environmental impacts and place demands on infrastructure and community facilities, such as schools and hospitals. It would also require some revisions to the Green Belt.
- 5.29 Taking all these factors into account, providing for an additional 8,000 dwellings between 2011 and 2031 (7,200 over the 18 year period to 2029), was considered by the Council to be a cautious but realistic approach in social and economic terms, and one that sought to give environmental factors and the concerns of local people due weight.

¹⁹ http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_november_2012/ecs?tab=files

Local Plan Consultation Document 2015

- 5.30 Following the Emerging Core Strategy consultation and the decision to progress a Local Plan, a further review of the evidence for growth in relation to housing need was undertaken, along with a review of the distribution strategy.

Policy Intention CS2: Meeting the Needs for Growth

- 5.31 Policy Intention CS2 updated ECS Policy CS2. It referred to the Borough's updated objectively assessed housing need (OAN) of 12,500 dwellings²⁰, but stated that a new housing target was to be set following consultation on the site options, further transport modelling and viability testing. The policy intention stated that the overall housing target for the plan period was likely to be below the objectively assessed housing need. It would include a target for new Gypsy and Traveller pitches and care home accommodation for elderly people. For the SA appraisal it was assumed that the target would be well above that set out in the ECS (7,200 dwellings).

SA findings

- 5.32 Significant positive effects were predicted in relation to meeting housing needs, and supporting the economy through maintaining a supply of employment land. The policy intention scored negatively with regard to the environmental outcomes as significant negative effects were likely for SA objectives 4.1, 4.2, 4.3, 4.7, 4.8, 4.10 and significant mixed effects were identified for objective 4.4 (enhancing / creating green infrastructure).
- 5.33 The SA scores for policy intention CS2 were consistent with the previous Emerging Core Strategy Policy CS2 appraised in the 2012 Sustainability Appraisal.
- 5.34 The SA commentary noted in its conclusions (Section 5 of the 2014 SA Report) that Policy intention CS2 did not provide a housing target, as this would be established following consultation on the site options and there was therefore uncertainty as to whether the Borough's OAN could be met. It concluded that while a higher target to meet the OAN for housing in the Borough would come with an increased risk of negative effects, there were other strategic policies in the Local Plan which were subject to SA in 2012, that would help to ensure that, where possible, negative effects were reduced and mitigated.

Proposed Submission Local Plan 2016

Policy SP 2 Targets for Growth – Reasons for choice of housing target

- 5.35 The Objectively Assessed Need (OAN) for housing was reviewed as part of the 2015 Partial Update of the Strategic Housing Market Assessment (SHMA)²¹, which recommended a figure of 12,616-13,433 homes over the 19 year period from 2013-2032. The OAN was reviewed again by Turleys, as part of the update to the Economy Study²², and they concluded it remains appropriate. This range is broadly similar to the OAN of 12,500 homes which was considered in the Draft Local Plan Consultation Document and accompanying SA.
- 5.36 Since the ECS there has been increasing recognition that Welwyn Hatfield needed to plan to accommodate more of the OAN for housing within the Borough, and could not rely on sites within the existing built up areas coupled with strategic sites on safeguarded land, and the limited release of land from the Green Belt around Welwyn Garden City and Hatfield.
- 5.37 Due to the significant shortfall between the capacity of sites within the built up area (urban capacity sites), other non-Green Belt sites (including safeguarded land), and the OAN, and the recommendations of the SA of the ECS which highlighted that a focus on the two main towns may not meet the needs of the villages, the Council decided to undertake a Green Belt review, and to consider releasing land from the Green Belt around the larger villages, and as a new settlement.
- 5.38 The housing target has been informed both by the OAN, and by consideration of potential allocations (strategic sites plus smaller key sites), and the deliverability of these sites. This has included the impact of allocating land on environmental, economic and social policy objectives, as

²⁰ Welwyn Hatfield Strategic Housing Market Assessment 2014 <http://www.welhat.gov.uk/article/5501/Housing>

²¹ Strategic Housing Market Assessment Partial Update 2015 <http://www.welhat.gov.uk/article/5501/Housing>

²² Welwyn Hatfield Economy Study Final Report Dec 2015 <http://www.welhat.gov.uk/article/5500/Employment>

informed by the SA. There has therefore been a combination of a site based (suitability and deliverability of sites) and need based (OAN) approach to identifying the housing target. The housing target is intrinsically linked to the settlement strategy which is considered further below.

- 5.39 The Proposed Submission Local Plan includes a housing target of around 12,000 homes within Welwyn Hatfield Borough, as part of Strategic Policy SP 2 Targets for Growth. This is a considerable increase on the ECS target of 7,200 and a more realistic reflection of local need, both for market and affordable housing, including the new requirement for starter homes. The policy also includes provision for residential or nursing care bed-spaces.
- 5.40 Taking into account the proposed allocations, there remains a shortfall in relation to the OAN of around 600-1,430 homes. The shortfall relates to the later part of the plan period, beyond 2027. Policy SP 2 also supports the delivery of a strategic site in East Herts as a sustainable extension to the east of Welwyn Garden City which would accommodate a further 1,350 homes, and would go towards meeting the need for housing within East Herts and within the Welwyn Hatfield Housing Market Area.
- 5.41 Overall, the Council considers the housing target will positively support the potential for growth in the economy, helping to maintain a good relationship between jobs and homes in the Borough, and meeting local needs for market and affordable housing.
- 5.42 The SA Findings for Policy SP 2 can be found in Chapter 6.

How Much Employment Growth

- 5.43 This section provides a summary of options considered in relation to the amount of employment land required, based on the number (and type) of jobs which the Borough is predicted to accommodate over the plan period.

Issues and Options 2009

- 5.44 Issues and Options alternatives PG1-PG10 relate to the part of Policy SP 2 which provides for employment land. The sustainability advantages and disadvantages of the options were reported on in the SA commentary which was included in the Issues and Options Consultation. The 2012 SA Report which accompanied the ECS reproduces the SA commentary for these options at para. 10.49-10.50 under Policy CS8 Economy (see SA Report 2012).
- 5.45 The options comprised:
- Option PG1: Choose to keep roughly the same number of jobs in the Borough as we have now to create a match between jobs and housing?
 - Option PG2: Allow the number of jobs in the Borough to rise to reflect the number of new homes to be built?
 - Option PG3: Provide jobs for people in neighbouring areas as a way of promoting the Hatfield and Welwyn Garden City as a Key Centre for Development and Change?
 - Options PG4-PG10 relating to the type (and location) of employment land to be provided comprised: focusing on knowledge based industries (e.g. close to the university), providing new sites focused on warehousing and distribution, regenerating existing employment areas, providing new employment development close to existing and proposed homes, protecting employment provision in villages and rural areas, remodelling existing employment sites to include other uses, retaining existing employment sites (Options PG4-PG10). Choices in relation to these options would influence the total amount of employment land / floorspace required and allocated.
- 5.46 In relation to the number of jobs the Borough should provide for, the strategy taken forward to the Emerging Core Strategy combined options PG2 and PG3 as the two towns will continue to provide jobs for those who live outside the Borough. However the strategy also sought to maintain current levels of alignment of jobs to housing based on the forecast in the Autumn 2010 run of the East of England Forecasting Model and the average of seven EEFM model runs between Autumn 2007 and Spring 2012. This would allow capacity for the local economy not to be

constrained by the lack of a local workforce and would maintain Welwyn Hatfield's role as a centre for employment for the surrounding area by enabling the ratio of jobs to resident population of working age to continue.

Emerging Core Strategy 2012

- 5.47 ECS Policy CS2 therefore aimed to support economic growth and maintain the current balance between jobs and homes in the Borough: 308ha employment land would be identified (to meet requirements for c. 12,200 jobs to be created between 2011-2029), and 19,228 square metres (gross) additional retail floorspace by 2029 to meet predicted expenditure growth. The Council would also resist any net loss in the allocated employment land and retail floorspace in the Borough's towns, neighbourhood and village centres.
- 5.48 The identified need for employment land of 308ha could be accommodated on existing sites without the need for a Green Belt review (ECS, supporting text to Policy CS8). The SA Findings in relation to ECS Policy CS2 can be found in the SA Report 2012, paragraphs 7.42-7.48.

Local Plan Consultation Document 2015

- 5.49 Since consultation on the Emerging Core Strategy finished, a further Economy Study²³ was commissioned, which considered a number of different scenarios for the local economy. It concluded that the Council should plan for an increase of 9,800 to 12,000 jobs in the Borough from 2013 to 2031. It also identified that less land may be required due to the trend towards more efficient use of office space and a reduction in manufacturing, identifying a potential surplus may be available. While noting that existing sites were generally of good quality, it also noted, with reference to vacancy rates, that existing space may not all be suitable for business needs.
- 5.50 Meanwhile, the Hertfordshire Local Enterprise Partnership's March 2014 Strategic Economic Plan (SEP) for the county was published. This was more aspirational in its approach to economic growth than the Economy Study, emphasising the importance of the A1(M) corridor for the pharmaceutical and bioscience sector, and advanced engineering.
- 5.51 The Local Plan Consultation Document, considering the options and whether to increase the job creation target (from around 12,000) notes: *"The council's objectively assessed need for housing is predicated on achieving a net increase of 12,000 jobs in the Borough from 2013 to 2031. If an approach involving significantly higher jobs numbers were to be pursued, there would be some major consequences. To achieve an alignment between jobs and housing, the objectively-assessed need for housing would increase commensurately, probably exceeding what would be deliverable. Jobs growth without aligned housing growth would mean that inward commuting would have to increase because not all of the extra people working in the Borough would be able to live in the Borough. This would have a knock-on effect on transport links, adding strain to existing infrastructure. So the council's intended approach is to plan for an increase of about 12,000 jobs whilst seeking to attract investment in the bioscience sector in line with the aspirations of the SEP, but without the disadvantages that would occur if the alignment between jobs and homes were not maintained."*
- 5.52 Policy Intention CS2B therefore stated: *Policy CS2 will be amended to plan for an increase of about 12,000 jobs from 2013 to 2031 whilst maintaining a supply of approximately 308 hectares of employment land to provide a range of job opportunities. In order to support Hertfordshire's Strategic Economic Plan the council will seek to ensure it provides opportunities for investment in life sciences and advanced engineering and will prepare development briefs for its key vacant employment sites. As part of the preparation of the Local Plan the council will review the appropriateness of its designated employment areas to meet this strategy and invited comments as part of the consultation, including whether existing employment sites should be re-allocated for other uses, and alternative sites identified which may be more attractive to businesses (e.g. to attract life sciences / advanced engineering close to rail links from London to Cambridge).*
- 5.53 The policy intention also set out the Borough's employment land target of 308 hectares (the same as the ECS), but sought to consult on whether more suitable or attractive employment land in the Green Belt should be sought to attract business investment.

²³ Welwyn Hatfield Economy Study Final Report July 2014 <http://www.welhat.gov.uk/article/5500/Employment>

Proposed Submission Local Plan 2016

- 5.54 Since the Local Plan Consultation Document 2015 was produced, there have been further updates to the evidence base. As the economy has recovered, the density of jobs to workers in the Borough has increased, meaning that there are more jobs in the Borough than workers (Proposed Submission Local Plan para. 10.2). The Economy Study Update 2015²⁴ has informed the strategy for employment land in the Proposed Submission Local Plan. This considered three scenarios for job growth between 2013 and 2032, which predicted increases ranging from 15,960-17,900 jobs, with variations in the type of jobs predicted (e.g. one scenario considered higher levels of jobs in the warehousing and distribution sector would occur). Due to the variations in the predictions, the Economy Study Update recommended taking a hybrid approach, arriving at a predicted increase of about 16,900 jobs over the plan period.
- 5.55 Informed by the updated evidence base, the Council's strategy is to ensure that the Borough remains an attractive place for investment for existing and new businesses, helping to create opportunities for jobs and training, and that land is identified to maintain a sufficient supply of jobs, and to provide flexibility so as not to constrain the local economy.
- 5.56 Translating the increase in jobs into a land requirement, the Economy Study Update identified a shortfall of employment land of 5.4ha by 2032. As such, it recommended protecting existing sites in employment use.
- 5.57 Policy SP 2 states that 294ha of employment land has been identified to maintain a sufficient supply of jobs, and provide for growth over the plan period. This land will include for at least 116,400 sqm of floorspace for Class B uses, and is located on existing employment sites and new mixed use sites including Marshmoor in Welham Green: SDS7 (WeG4b), and areas allocated as part the strategic housing sites at South East Welwyn Garden City (SDS2), Broadwater Road West, Welwyn Garden City (SDS3 & SDS4), and SDS5 (Hat1), North West Hatfield. Existing employment sites are designated as employment areas through the Proposed Submission Local Plan, to protect them (Policies SP 8 and SADM 10).
- 5.58 The combination of provision is intended to meet the needs of different sectors of the economy, in sustainable locations which are close to where people live and new houses are planned.
- 5.59 Overall, the Proposed Submission Local Plan states that identification of employment land would accommodate for an increase of around 14,500 jobs. While this is lower than the predicted requirement for the increase in jobs over the plan period (and could theoretically constrain growth), the shortfall is made up for by the increase in jobs of 2,600 which occurred between 2013-2014, giving a total of 17,100 (Proposed Submission Local Plan para. 5.5).
- 5.60 Policy SP 2 also continues the protective stance towards existing employment floorspace and land. However, changes to the permitted development regime have resulted in a loss of office space with conversions to residential use. While the Plan assumes some further losses will take place, it is intended that the use of Article 4 directions in relation to the protection of the best quality office space to minimise further conversions to residential.
- 5.61 While the growth in jobs is now predicted to be higher than during the previous stages of plan preparation, with the recovery of the economy, the amount of land required has reduced slightly. The difference in the likely impacts will therefore relate more to the numbers of people working in the Borough, how they travel to work, than the land required for employment development. The economic benefits will be greater, in terms of local spend, and opportunities for training and employment for both local people and those living outside the Borough.

How Much Retail Growth

- 5.62 The Council's intention has been to meet the need for additional retail floorspace to meet predicted expenditure growth. Changes in the amount of retail floorspace to be provided have generally related to the predicted levels of growth in expenditure, based on the latest findings of the Council's Town Centre and Retail Needs Assessment. However, changes in retail practices,

²⁴ Welwyn Hatfield Economy Study Final Report Dec 2015 <http://www.welhat.gov.uk/article/5500/Employment>

including the rise of internet shopping, have also influenced the amount of space to be provided, and have increased the uncertainty associated with forecasts in demand for floorspace. Therefore the alternative amounts of floorspace have been linked to meeting the needs identified by the most up to date needs assessment.

- 5.63 The needs assessment has also identified the location for floorspace demand, and as such, the alternatives considered, and the strategy chosen also incorporate a spatial element. The Council's focus has been on supporting Welwyn Garden City town centre as a retail centre, and seeking to regenerate Hatfield town centre, rather than increasing the role and size of out of town retail provision, such as Hatfield Galleria.

Issues and Options 2009

- 5.64 At the Issues and Options Stage, no further need for out of town growth was identified. The strategy for retail focused on supporting the town centres (rather than the out of town Hatfield Galleria), including the regeneration of Hatfield town centre (see SA Report 2012, para. 10.3), and meeting at least the minimum need identified in the latest Town Centre and Retail Needs Assessment, primarily in Welwyn Garden City (See Option PG14; SA Report 2012, p. 94). The SA Findings can be found at SA Report 2012, p. 94-98, and identified likely positive economic effects for options which sought to increase the amount of retail floorspace in line with the identified need.

Emerging Core Strategy 2012

- 5.65 Policy CS2 of the ECS included provision for around 19,200 square metres (gross) additional floor space by 2029 to meet predicted expenditure growth, along with protection of existing retail floorspace in the towns, neighbourhood and village centres.
- 5.66 The SA Findings for the retail elements of Policy CS2 were positive (see SA Report 2012, para. 7.44): *"...the policy also has the potential for significant positive effects on the vitality and attraction of Welwyn Garden City and Hatfield retail centres, taking into account planned increases in retail floorspace, although these are uncertain, being dependent on the particular locations chosen for development."*

Local Plan Consultation 2015

- 5.67 No changes to the approach to retail growth were set out in the Local Plan Consultation in 2015.

Proposed Submission Local Plan 2016

- 5.68 The Council's strategy continues to be to maintain and enhance the vitality, viability and economic prosperity of the Borough's town, neighbourhood and village centres. In this way, it seeks to ensure economic activity is concentrated in the most sustainable locations, which are accessible by sustainable (non-car) modes of transport.
- 5.69 Strategic Policy SP 2 states that retail floorspace of 12,500 square metres to meet the predicted growth in expenditure to 2026 will be accommodated within existing centres, and at an appropriate scale to support strategic development sites. This is a smaller allocation than proposed at the ECS, but reflects the evidence base.
- 5.70 The policy is informed by the evidence base, primarily the Retail and Town Centre Needs Assessment Update (May 2016)²⁵. A growth horizon of 2026 is used as beyond this points forecasts are less accurate, and there is increasing uncertainty about future forms of retail (including the level of increase in internet shopping) and the levels of floorspace these will require. The evidence base will therefore be kept under review.
- 5.71 As in the ECS, the loss of existing retail space in town, neighbourhood and villages centres will be resisted, unless it is otherwise in accordance with other plan policies.
- 5.72 The SA Findings for Policy SP 2 are provided in Chapter 6.

²⁵ Welwyn Hatfield Retail and Town Centre Needs Assessment Update (May 2016) <http://www.welhat.gov.uk/article/5504/Retail>

- 5.73 The proposed quantity and location of retail development is described in more detail with reference to the retail hierarchy in Policy SP 5.

Settlement Strategy and Alternative Spatial Options

- 5.74 The settlement strategy options considered in the preparation of the Local Plan focused on the alternatives for the distribution of housing growth, as the primary requirement for identifying broad locations for development which would need to be released from the Green Belt. Other land uses, such as schools, shops and community facilities, would be accommodated alongside housing, as part of sustainable neighbourhoods, and proximity to employment areas was a key consideration. Some of the strategic sites also include allocations for employment uses.
- 5.75 Alternatives to the settlement strategy were considered at four main stages: at the Issues and Options Stage, during the preparation of the Emerging Core Strategy, the Draft Local Plan Consultation Document, and in preparing the Proposed Submission Local Plan. This section provides a 'timeline' to show the progression from the Issues and Options stage through to the Emerging Core Strategy.

Core Strategy Issues and Options 2009

- 5.76 The Issues and Options Report 2009 set out the relevant issues around the need to identify land for housing on p.243-244 (in the 'Issues' text box): while Welwyn Hatfield had been successful and planned to continue making best use of previously developed land, to meet the housing target land would need to be released from the Green Belt. The amount of land required would depend on the number of dwellings which could be accommodated on urban capacity sites (at that time estimated at around 3,100), and the density of development on urban capacity and greenfield land, and the other land uses which would need to be provided alongside new homes. The consultation sought views on three main issues: density of development (with a view to informing how much Green Belt land would be required), coalescence of settlements (to inform possible broad locations for development) and the broad approach to distributing housing growth based on a series of high level options. This was followed by questions seeking views on where growth might be best located, considering a series of broad locations for growth around the main towns of Welwyn Garden City and Hatfield, and around the large and small inset villages. For each option it was implicit (based on the approach described on p.243-244) that urban capacity sites would provide the first source of supply for housing development (brownfield or greenfield sites within urban areas), while land outside existing settlements on Green Belt or safeguarded land, would provide the remainder.
- 5.77 The following options were put forward for the distribution of housing growth in the Issues and Options Report, with text from the Report shown in italics.

- Option PG31 Proportionate Distribution

Should the main focus for housing growth be in and around Welwyn Garden City and Hatfield with the large villages of Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands and Mardley Heath, Welham Green, Welwyn and Woolmer Green also having to accommodate some limited housing growth? In the example set out below, a potential pattern of housing distribution could be broadly proportionate to the size of population. This option could involve the use of both urban land, and land that is currently in the Green Belt, and would be likely to trigger a green belt review around most, if not all, such settlements. (See table on p.254 of the Issues and Options Report)

OR

- Option PG32 Growth concentrated in urban extensions

If growth is not proportionately distributed between all of the Borough's towns and larger villages, should it be located in areas of large scale urban expansion focused around either, or both, Welwyn Garden City and Hatfield?

If this growth were to be concentrated in one or two large extensions, subject to the scale of development, this should enable the creation of new neighbourhoods including shops and other key facilities (and possibly including employment).

- 5.78 For Option PG32, respondents were asked indicate which of the following options they would prefer:
- a) *Growth focused mainly around Welwyn Garden City; OR*
 - b) *Growth focused mainly around Hatfield; OR*
 - c) *Growth focused mainly around both Welwyn Garden City and Hatfield.*
- 5.79 Broad locations for growth around Welwyn Garden City and Hatfield were included in the Issues and Options Report, and sustainability advantages and disadvantages set out from work on the SA (Options PG33-34 around Welwyn Garden City and PG35-38 around Hatfield).
- 5.80 An additional option PG36A was included, for growth to the west of the redeveloped part of Hatfield Aerodrome, to include land within St Albans District (through a co-ordinated or joint development plan document in accordance at that time with the East of England Plan, which was subsequently amended).
- 5.81 Options for large scale expansion around one or more of the Borough's villages (Options PG39-46) were also included in the Issues and Options Report in the event that Options PG31 and PG32 were found not to deliver sufficient growth, even though the Issues and Options Paper stated (at paragraph 6.244) that the major expansion of one or more village would be contrary to the Regional Spatial strategy and to the vision for the Borough.
- 5.82 The SA considered the sustainability advantages and disadvantages of growth at each settlement, and at each broad location for growth (including around the villages) rather than for Options PG31, PG32 and PG39-46, as a whole. This approach was chosen because the sustainability advantages and disadvantages would be *'dependent upon the locations where that development takes place'.... .. and they... 'therefore provide a broad overview of the relative pros and cons of focusing development at Welwyn Garden City, Hatfield, and other settlements in strategic terms.'* A commentary for each option was provided in the Issues and Options Report.
- 5.83 This approach also allowed for the sustainability advantages and disadvantages of a combination of the options to be considered.
- 5.84 A summary commentary of the sustainability advantages and disadvantages of the three main options for housing distribution considered in the Issues and Options Report is provided in the SA Report 2012 (p.46-52). This provided an overview of each main option, drawing on the sustainability commentary provided in the Issues and Options Report. Reference was also made to the *Housing Background Paper Part 2 – Distribution Options*²⁶, which provided a review of spatial distribution strategy options.

Emerging Core Strategy 2012

- 5.85 Six Distribution Options were considered by the Council to inform the Emerging Core Strategy (ECS), and set out in *Housing Background Paper Part 2* which supported the ECS:
- Urban Capacity (also one of the housing target options referred to above).
 - Option 1 - Proportionate Distribution (Option PG31 of Issues and Options Report).
 - Option 2 – Growth mainly focused towards Welwyn Garden City (Option PG32a of Issues and Options Report).
 - Option 3 – Growth mainly focused towards Hatfield (Option PG32b of Issues and Options Report).
 - Option 4 (the preferred option) – Growth focused mainly towards Welwyn Garden City and Hatfield (PG32c of Issues and Options Report).

²⁶*Housing Background Paper Part 2 – Housing Distribution*, WHBC, 2012.
http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_november_2012/ecs?tab=files

- Option 5 - Growth focused on the two towns and the large-scale expansion of one or more of the Large Excluded Villages (draws on Options PG32c and PG39-46 of Issues and Options Report).
 - Option 6 - Growth mainly directed towards Welwyn Garden City and Hatfield with limited growth around Large Excluded Villages (combination and variation of Options PG31 and PG32c of Issues and Options Report).
- 5.86 The spatial distribution taken forward into the Emerging Core Strategy was **Option 4** – Growth focused mainly towards Welwyn Garden City and Hatfield. **Option 6** was considered to be a reasonable alternative by the Council. The SA also compared these options with **Option 1** (see SA Report 2012, p.59-68; and summary below).
- 5.87 As set out in the *Housing Background Paper Part 2*, Option 4 was selected by WHBC as the preferred option because it would:
- Improve housing supply.
 - Plan for growth in sustainable locations.
 - Concentrate growth at Welwyn Garden City and Hatfield which are located on communication routes where economic growth is favourable and build upon the success of the New Towns.
 - Direct most growth away from smaller settlements which have few or no employment opportunities.
 - Limit the extent of Green Belt review.
 - Increase population catchments, supporting investment in and regeneration of town centres.
 - Locate development close to significant sources of employment.
 - Take into account the strategic function of the Green Belt.
 - Avoid coalescence between settlements and maintain the separate identities of settlements.
 - Focus growth within settlements and only expand settlements where this needs to happen.
- 5.88 The preferred spatial distribution in the Emerging Core Strategy therefore comprised the following sources of housing land supply (numbers may be rounded):
- Urban capacity in the towns and excluded villages (estimated capacity **3,320**)²⁷.
 - A broad location to the north east of Welwyn Garden City through the use of Safeguarded Land 'BLG1' at Panshanger (estimated capacity **700**).
 - A broad location to the north west of Hatfield through the release of land from the Green Belt 'BLG2' (estimated capacity **2,000**).
 - Urban extension(s) to Welwyn Garden City and Hatfield through the release of Green Belt (**315**).
 - The re-development of a Major Developed Site in the Green Belt near Welwyn village (estimated capacity **180**).
 - Urban extension to Welwyn Garden City on land in East Herts district (**400** during the plan period).
 - Urban extension to Hatfield on land in St Albans district (**60** during the plan period).
 - An allowance for windfall development (**290**).
 - Safeguarded land to the west of Hatfield and in East Herts beyond the plan period.
- 5.89 Policy CS3 Settlement Strategy sought to direct growth to the most sustainable locations, with the primary focus for new development in and around the Main Town of Welwyn Garden City, and the Town of Hatfield (over 90% of growth would be located here). Four large inset villages were the secondary focus for new development at a scale compatible with the more limited range of job opportunities, services and facilities available in these locations. Small inset villages would

²⁷ Includes completions in 2011/12 and capacity on urban and Green Belt sites with planning permission

accommodate more minor infill development. Development in the large and small inset villages (those excluded from the Green Belt) was limited to urban capacity (brownfield) sites, with no expansion outside the villages.

5.90 From an SA perspective, it was considered that the preferred settlement strategy as set out in the ECS had a number of sustainability benefits including:

- An emphasis on making best use of previously developed land within the two main towns, to encourage regeneration and renewal of the town centres, minimise the need to travel, and minimise the amount of greenfield land required for development.
- A balanced approach identifying broad areas of growth and urban extensions around both Welwyn Garden City and Hatfield, to support the economies of both towns, support existing neighbourhoods, and ensure good accessibility to jobs and services. This should also help to minimise transport and other infrastructure capacity problems, although there is a risk that the distance of the extension from the town centre could result in an element of car use. While some landscape impacts are unavoidable, the strategy seeks to minimise landscape impacts by directing development wherever possible to less sensitive landscapes, and has been informed by a Landscape Capacity and Sensitivity Study (the draft of which was available to inform the SA).
- This approach, mitigated by other Core Strategy policies, should minimise the impact of growth on the character of the main towns and other settlements, and on the landscapes around settlements.
- Protecting the character of the villages, smallest settlements and rural areas by limiting development in these areas.
- A strategy that includes sufficient land and flexibility to deliver the identified need for housing over the plan period.

5.91 However, when compared with distribution options which would direct more growth to the larger, more sustainably located villages which are best served by shops, services and jobs (such as Option 6, including development around the larger villages, and Option 1, the Proportionate Approach, to which it was compared in the SA), the SA found that preferred Option 4 performed less well in terms of meeting the future need for housing generated from within the villages and was less likely to support the vitality of rural communities and viability of rural businesses and services.

5.92 The chosen strategy also relied on development coming forward outside the Borough, but which would contribute towards Welwyn Hatfield's OAN for housing.

Draft Local Plan Consultation Document 2015

5.93 The SA of the Emerging Core Strategy identified that the proposed focus of development on the two main towns of Welwyn Garden City and Hatfield could lead to some of the villages not being able to meet their needs. In response to the review of the evidence base for growth, along with the findings of the SA and greater support from consultation comments for a more proportionate distribution of housing, the Local Plan Consultation Document proposed a greater proportion of development at the villages, whilst still retaining an urban focus.

5.94 Table 1 Potential Distribution of Housing Growth, set out an estimate of the proportionate growth for each settlement based on current household numbers and the equivalent proportion of the OAN. Taking into account recent completions, remaining urban capacity sites, and potential greenfield sites a total potential capacity was identified for each settlement, with around 60% assigned to Welwyn Garden City and Hatfield. However, it was recognised that the potential capacity was not strictly proportionate as it related to the availability of suitable sites (albeit sites are not named in the Settlement Strategy).

Policy Intention CS3: Settlement Strategy

5.95 Policy intention CS3 therefore set out a more dispersed and proportionate approach to the distribution of development across the Borough than was proposed in the ECS. The distribution would continue to focus primarily on WGC and Hatfield, while also seeking to deliver a greater proportion of development in and around villages (i.e. greenfield as well as urban capacity),

combining Options 1 and 6 as described above. The intention to prioritise development of previously developed land remained.

SA findings

- 5.96 Policy intention CS3 was not considered to result in any significant negative effects and the majority of significant positive scores were with respect to economic objectives (see SA Report 2014, para. 4.36-4.53).
- 5.97 The scores for policy intention CS3 were consistent with the previous Emerging Core Strategy Policy CS3 appraised in the 2012 Sustainability Appraisal. The exceptions were in relation to SA objectives 4.2 and 4.3 (reduce greenhouse gas emissions from transport/reduce air pollution) which were predicted to have minor mixed effects rather than minor positive due to the more dispersed nature of development, SA objective 6.4 (protect rural character) which scored minor positive rather than uncertain in the ECS, and SA objective 5.1 (meet housing needs), which scored significant positive rather than significant mixed effects in the ECS. This reflected the increase in housing numbers to be provided, and its distribution to include more housing in and around the large excluded villages, meeting local housing needs and supporting these communities.

Reasons for the Settlement Strategy and Green Belt Boundaries in the Proposed Submission Local Plan

- 5.98 The settlement strategy put forward in the Local Plan Consultation Document, to follow a more proportionate approach, has been carried forward into the Proposed Submission Local Plan.
- 5.99 The consideration of strategic and key sites has also informed the settlement strategy as this has relied on the availability of suitable sites, as well as a strategic desire for all areas of the Borough to both benefit from and 'take their share' more proportionately of new development, and which has been broadly supported in consultation²⁸.
- 5.100 In addition NPPF paragraph 84 states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. The towns and the villages which are excluded from the Green Belt are the most sustainable settlements and are therefore considered to offer the best opportunity for a sustainable pattern of development. Consultation responses also asked the Council to consider the potential for a new settlement. A proposal for a new village at Symondshyde was submitted in response to the Local Plan Consultation Document 2015, and this has been appraised by the Council and as part of the SA.
- 5.101 The Housing Site Selection Background Paper 2016²⁹ considers the results of the Housing and Economic Land Availability Assessment (HELAA), the impact on the purposes of the Green Belt and the Green Belt boundary, the Sustainability Appraisal of sites, the Sequential Test and an analysis of strategic advantages and disadvantages associated with sites. It identifies sites which are considered to be selectable and sites where it is considered the harm outweighs the benefits associated with a site coming forward.
- 5.102 Further consideration of strategic sites and the reasons for their inclusion as proposed allocations is provided in the section below.
- 5.103 Policy SP 3 sets out the proposed Settlement Strategy and Green Belt Boundaries, and includes the Settlement Hierarchy. In line with the hierarchy the primary focus for development will be Welwyn Garden City and Hatfield, with the secondary focus in and around the excluded villages, and through development of a new village at Symondshyde. Elsewhere development will be restricted. Development will be resisted which would result in the disproportionate growth to any of the settlements, conflict with its function and position in the hierarchy, cannot be supported by necessary infrastructure or would result in a loss of services and facilities which are key to supporting local communities.

²⁸ Report to Cabinet Housing and Planning Panel 13.06. 16
<http://democracy.welhat.gov.uk/ieListDocuments.aspx?CId=165&MId=314&Ver=4>

²⁹ see footnote 23

- 5.104 The justification to Policy SP 3 and for the review and release of Green Belt land is set out at paragraphs 5.4, 5.7 and 6.2 of the Proposed Submission Local Plan and in the Council's Cabinet Housing and Planning Panel reports in June and July 2016 which accompanied the site selection work and the draft Proposed Submission Local Plan for the consideration of council members. In summary they state that:
- Land within urban areas is limited, and insufficient to meet the Borough's housing and employment needs over the plan period.
 - The shortfall [in urban land] to meet the OAN is considerable and justifies the review of Green Belt boundaries to potentially accommodate growth around Welwyn Garden City, Hatfield and some of the villages, and via a new village at Symondshyde to the north-west of Hatfield.
 - Without releasing land from the Green Belt, opportunities within the Borough for growth would be significantly constrained, and there would be an insufficient supply of land for housing and employment growth. The social, environmental and economic benefits of releasing Green Belt land are considered to outweigh the harm to Green Belt purposes in certain parts of the Borough, and thus exceptional circumstances exist for the release of Green Belt land in certain locations to accommodate housing and employment growth.
 - Growth is proposed in line with the settlement strategy and directed to the most sustainable locations: Welwyn Garden City, Hatfield, the larger excluded villages and a new village to the north-west of Hatfield. Safeguarded land at Panshanger, to the north-east of Welwyn Garden City is also allocated for development.
- 5.105 Welwyn Garden City and Hatfield are accessible by road and rail, and contain the Borough's main employment areas, town centres, services and community facilities, supported by neighbourhood centres and infrastructure. Adding to the critical mass of the main towns would make best use of existing infrastructure, and the opportunities to improve this, as well as maximise opportunities for regeneration. Growth is also directed to the most sustainable villages. As service centres, the large excluded villages play an important role in serving the day to day needs of village communities and for those living and working in surrounding rural areas. They are served by mainline railway stations, bus services, or both. Small excluded villages have a more limited range of employment and services, and only one is served by a railway station. A proposed new village at Symondshyde will have the same place within the hierarchy as the existing small excluded villages reflecting the limited range of employment opportunities, services and facilities likely to be delivered in a small service centre alongside new homes. It is located close to employment areas within north west Hatfield.
- 5.106 The identification of strategic and key sites within the Borough, alongside an allowance for windfall development, and a small allowance for the non-implementation of permitted sites, will provide around 12,000 dwellings over the plan period. These sites are not identified in the settlement strategy.
- 5.107 The proposed distribution of housing growth by settlement is provided in Table 3 of the Proposed Submission Local Plan. Around two thirds of the housing target would be provided in and around Welwyn Garden City (around 5,000 homes) and Hatfield (around 3,000 homes) (numbers rounded up), with a further 1,500 homes in and around the larger excluded villages, and 1,175 homes in the rural areas (numbers rounded up). Development in the rural areas would mainly comprise a new village at Symondshyde, but also allows for limited infill development within Green Belt villages and designated Major Developed Sites in the Green Belt, and as conversions from existing buildings (all windfall sites).
- 5.108 The SA Findings in relation to Policy SP 3 are provided in Chapter 6 below.

Strategic Site Selection

- 5.109 From a broad consideration of strategic distribution options around one or both of the main towns at Issues and Options stage, through Broad Locations for Growth in the ECS, to Strategic and Key Sites at the Local Plan Proposed Consultation Stage, the approach to sites has become more specific. This has been a result of the change in approach from a Core Strategy to a Local Plan

including site allocations, the change in strategy to plan for a more proportionate distribution which involved smaller sites in and around the excluded villages, and the scale of the OAN.

- 5.110 Options and Broad Locations for Growth (BLG) were subject to SA at the Issues and Options and ECS stages (see SA Report 2012). Since then more specific sites have been identified and subject to appraisal. A summary of the strategic options and alternatives for broad locations and strategic sites is provided below. There are a number of strategic and key sites which are proposed within the urban areas of Welwyn Garden City, Hatfield, which aim to regenerate key areas of the main towns. However, the main focus for discussion is those locations and sites which lie outside the existing built up areas of the Borough, as these have more implications for the SA.

Issues and Options 2009 and Emerging Core Strategy 2012

- 5.111 The locations of the Options for Broad Locations for Growth considered at the Issues and Options and Emerging Core Strategy stages around Welwyn Garden City and Hatfield are shown in **Figure 5.1** (reproduced from p.74 of SA Report 2012). The reference PG refers to an option consulted on during the Issues and Options Consultation, and BLG refers to Broad Locations for Growth proposed for allocation in the Emerging Core Strategy (indicated by stars).

Growth around Welwyn Garden City

- 5.112 The Issues and Options Report identified broad locations for growth around Welwyn Garden City and Hatfield, based on the early indications of the Strategic Housing Land Availability Assessment (SHLAA). These are discussed below, along with those locations which were identified following the Issues and Options stage.

Issues and Options Stage

- 5.113 Two options for broad locations for growth around Welwyn Garden City were identified in the Issues and Options Report, and subject to SA at that stage:
- PG33, North East of Welwyn Garden City focused on the Panshanger Area.
 - PG34 South East of Welwyn Garden City north of the A414.

Alternative Locations in the Green Belt around Welwyn Garden City

- 5.114 A number of alternative locations in the Green Belt were identified through the consultation responses to the Issues and Options Report, but were not taken forward for further consideration having been considered through the SHLAA (Phase 2 – Land outside urban areas) process for a variety of reasons, including being poorly located in relation to urban settlement boundaries, poorly serviced by existing services and not large enough to support new services, poorly accessed, designated wildlife sites, within flood zone 3, would threaten the purpose of the Green Belt, or were no longer available. These locations were therefore not considered to be reasonable alternatives, and have not been subject to further appraisal through the SA.
- 5.115 However, one other reasonable alternative broad location within the Green Belt around Welwyn Garden City was considered suitable for consideration. This is addressed below.
- Land in East Hertfordshire (east of Welwyn Garden City)
- 5.116 A longer term option (as minerals would take at least 10 years to extract), and outside Welwyn Hatfield Borough in East Hertfordshire, this option was appraised as part of the Emerging Core Strategy as a potential option for a future extension of Welwyn Garden City to the east, meeting some of the Borough's need for housing towards the end of the plan period and beyond. It was suggested as an option by East Hertfordshire District Council in its Issues and Options Consultation in 2010 (see *Housing Background Paper Part 2* Appendix B).

Further detailed appraisal work following Issues and Options stage

- 5.117 Following the consultation on the Issues and Options, officers carried out more detailed assessment of the potential broad locations for development around Welwyn Garden City, as described in *Housing Background Paper Part 2*. These were also subject to further SA.

Welwyn Hatfield Core Strategy

Options for Broad Locations for Growth



5.118 Detailed appraisal matrices for each of these alternative broad locations are included in **Appendix A3** of the 2012 SA Report and a summary of the sustainability scores is provided in **Table 5.1** below.

Table 5.1: Summary of sustainability scores for alternative broad locations around Welwyn Garden City

SA Question: Will the policy...	PG33: North East of Welwyn Garden City	PG34: South-east of Welwyn Garden City	Land in East Herts - East of Welwyn Garden City
Long-term Objective 1: Health Improvement			
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	+	+/-?	+
...lead to improved health for all? (1.2)	0	0	0
Long-term Objective 2: Safer Communities			
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	0	0	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	++	++	++
Long-term objective 3: Good Citizenship			
...encourage involvement of the public in the planning process? (3.1)	0	0	0
Long-term objective 4: Improving the environment			
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	+/-	+/-	+/-
...avoid and reduce air pollution? (4.3)	+/-	+/-	+/-
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	--	--	--/?
...protect and enhance the Borough's character, sense of place and local distinctiveness, historic and cultural assets? (4.5)	?	?	?/?
...protect and enhance biodiversity, taking into account the impacts of climate change? (4.6)	-	-	-

SA Question: Will the policy...	PG33: North East of Welwyn Garden City	PG34: South-east of Welwyn Garden City	Land in East Herts - East of Welwyn Garden City
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0
...avoid water pollution? (4.8)	-	-	-
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	++	++	?
Long-term Objective 5: Decent Housing			
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	++	++	0
Long-term objective 6: A thriving economy			
...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)	0	0	0
...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)	0	0	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	+	+	+
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	0	0	0
...avoid the sterilisation of mineral resources? (6.5)	0	++	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	?	+	+

- 5.119 On the basis of the more detailed work undertaken, and informed by the SA, Broad Locations for Growth were selected for inclusion in the Emerging Core Strategy.

Reasons for selecting Locations for Growth around Welwyn Garden City

- 5.120 This section summarises the reasons for taking forward certain options to the Emerging Core Strategy and rejecting others. It draws on the *Housing Background Paper Part 2*, including Appendix A: 'Responses to Consultation and the Council's Review of Broad Locations Set Out in the Issues and Options Paper 2009'.

Options Taken Forward to Emerging Core Strategy

- 5.121 Option PG33 to the north east of Welwyn Garden City on safeguarded land was taken forward into the Emerging Core Strategy as Broad Location for Growth 1 (BLG1, Policy CS4 & CS15), for the following reasons: The landowners are willing to work together and the land would be available in the early years of the plan period. The land adjoins an existing neighbourhood, with parts of the area accessible to existing shops and facilities including a neighbourhood centre with GP surgery and a primary school (at capacity). While not large enough to create a new neighbourhood, it would contribute to the provision of improved local facilities comprising at least a corner shop, and would need to provide for increased primary school places locally. Structural landscaping would be required to mitigate the visual impact of development on the Mimram valley, which the Council considers would be achievable. As safeguarded land this location has already been released from the Green Belt although policies of restraint currently apply, and has been identified to deliver around 700 homes.
- 5.122 The Emerging Core Strategy identifies that urban extensions of around 315 homes would be released from the Green Belt around Welwyn Garden City and Hatfield (Policy CS4), but does not specify where this would be. The preferred option(s) would be identified in a Site Allocations Development Plan Document.
- 5.123 Finally, land in East Hertfordshire (east of Welwyn Garden City) is taken forward as a long term option for growth through joint working with East Herts District Council. This location could be planned as an extension to Welwyn Garden City including new infrastructure such as a primary and secondary school and neighbourhood centre, and would meet some of the Borough's housing requirements (see *Housing Background Paper Part 2*, p.14).

Options Rejected

- 5.124 Option PG34 to the south east of Welwyn Garden City was rejected for the reasons set out in the *Housing Background Paper Part 2* (Appendix A, Location B), including its location within a sensitive landscape, with adjacent nature conservation designations creating uncertainty about the area of land available for development, a poor relationship with existing development (which would be a barrier to connectivity), too small to create a neighbourhood centre, and as development would result in an incoherent boundary between the urban area and the Green Belt.
- 5.125 The SA found that there would be few material differences in the effects of developing housing south east of Welwyn Garden City compared to developing housing north east of Welwyn Garden City. In terms of significant effects identified, both would avoid areas of high flood risk (significant positive effect on SA objective 2.2), avoid productive agricultural land (significant positive effect on SA objective 4.10) and make a significant positive contribution to meeting housing need (SA objective 5.1). Both locations have the potential for significant adverse effects on open space and landscape character (SA objective 4.4), although in both instances this would be dependent upon how the development is delivered in design terms.
- 5.126 However, the SA found that development south-east of Welwyn Garden City could have some advantages. The mineral resource south-east of Welwyn Garden City has already been extracted, whereas north-east of Welwyn Garden City any such resource would need to be worked out first (SA objective 6.5). The larger potential scale of development south-east of Welwyn Hatfield (potential to accommodate 1,200 dwellings as opposed to 700 dwellings north-east of Welwyn Garden City) means that it offers a slightly greater opportunity to support local community services and facilities although both locations are judged too small to support a new neighbourhood centre. Conversely, there is the potential for adverse health risks from the landfill (SA objective 1.1) although it is likely that this could be mitigated.

Growth around Hatfield

Issues and Options Stage

- 5.127 The following options were identified in the Issues and Options report and appraised at that stage, with the sustainability advantages and disadvantages identified set out in the tables within the Issues and Options Report, and reproduced at p.81-82 of the 2012 SA Report.
- PG35: North west of Hatfield. Flat area to the north of Hatfield Garden Village and to the west of the A1(M).
 - PG36: West of the redeveloped part of the Hatfield Aerodrome.
 - PG36a: Land Partially in St Albans at Smallford An alternative to Option PG36.
 - PG37: West of Ellenbrook and Roehyde. Land to the north and south of the A414 and separated from the rest of Hatfield by the A1(M). Originally identified with a capacity for 2,100-2,900 homes, most of the area lies outside the Borough in St Albans District).
 - PG38: South of Hatfield. South of the A1001 and north of Welham Green. This location (with a capacity for around 900-1,300 dwellings) was appraised at the Issues and Options stage.

Further detailed appraisal work following Issues and Options stage

- 5.128 Following the consultation on the Issues and Options, officers narrowed down the potential broad locations for development around Hatfield for more detailed assessment, as described in *Housing Background Paper Part 2*. Four alternatives were considered:
- 5.129 Detailed appraisal matrices for each of these alternative broad locations are included in **Appendix A3** and a summary of the sustainability scores is provided in **Table 5.2**.

Table 5.2: Summary of sustainability scores for alternative broad locations around Hatfield

SA Question: Will the policy...	PG35: North West of Hatfield	PG36: Land West of Hatfield Aerodrome	PG37: West of Ellenbrook and Roehyde	PG38: South of Hatfield
Long-term Objective 1: Health Improvement				
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	-	-?	-	+
...lead to improved health for all? (1.2)	0	0	0	0
Long-term Objective 2: Safer Communities				
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	0	0	0	0

SA Question: Will the policy...	PG35: North West of Hatfield	PG36: Land West of Hatfield Aerodrome	PG37: West of Ellenbrook and Roehyde	PG38: South of Hatfield
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	++	++	-?	++
Long-term objective 3: Good Citizenship				
...encourage involvement of the public in the planning process? (3.1)	0	0	0	0
Long-term objective 4: Improving the environment				
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	--	--	--	+/-
...avoid and reduce air pollution? (4.3)	--	--	--	+/-
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	--	--	--/?	--/?
...protect and enhance the Borough's character, sense of place and local distinctiveness, historic and cultural assets? (4.5)	?/--?	--/?	-?/-	?
...protect and enhance biodiversity, taking into account the impacts of climate change? (4.6)	-	-	-	--?
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0	0
...avoid water pollution? (4.8)	-	-	-	-

SA Question: Will the policy...	PG35: North West of Hatfield	PG36: Land West of Hatfield Aerodrome	PG37: West of Ellenbrook and Roehyde	PG38: South of Hatfield
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0	0	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	--	--	--?	++
Long-term Objective 5: Decent Housing				
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	++	?	++	+
Long-term objective 6: A thriving economy				
...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)	0	0	0	0
...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)	+	0	0	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	+	-	-	+
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	0	0	0	+
...avoid the sterilisation of mineral resources? (6.5)	0	0	0	0

SA Question: Will the policy...	PG35: North West of Hatfield	PG36: Land West of Hatfield Aerodrome	PG37: West of Ellenbrook and Roehyde	PG38: South of Hatfield
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	++	++	-	-

5.130 On the basis of the more detailed work undertaken, and informed by the SA, Broad Locations for Growth and Safeguarded Land were selected for inclusion in the Emerging Core Strategy.

Reasons for selecting Broad Locations for Growth around Hatfield

5.131 The Emerging Core Strategy identifies Broad Locations for Growth in Policy CS4: Green Belt Boundaries and Safeguarded Land. This section summarises the reasons for taking forward the preferred locations to the Emerging Core Strategy, and rejecting other options. It draws on the *Housing Background Paper Part 2*, including Appendix A: 'Review of Broad Locations set out in the Issues and Options Paper (2009)'.

Options Taken Forward to Emerging Core Strategy

5.132 Option PG35: North west of Hatfield, a flat area to the north of Hatfield Garden Village and to the west of the A1(M), was taken forward to the Emerging Core Strategy as Broad Location for Growth 2 (BLG2) for the following reasons: Potential to create a sustainable community of 2,000 homes and a full range of local facilities, with good connectivity with recent new development in this part of Hatfield. Landowners are willing to work together and development would be phased to allow for mineral reserves to be worked first. Development would come forward in phases and would need to address road network and junction capacity, sewerage, and schools capacity, with careful planning required to avoid coalescence with Stanborough and to manage visual and noise intrusion from the A1(M).

5.133 Option PG36: West of the redeveloped part of the Hatfield Aerodrome was taken forward to the Emerging Core Strategy as a proposal for safeguarded land (for development only beyond the plan period) for the following reasons. While this location has a number of issues to overcome (detached from Hatfield, poor relationship to existing development, junction capacity at A1(M), sewage, transport and education capacity, phasing for minerals extraction, high landscape sensitivity and potential loss of green infrastructure, and intention to seek to develop further west in the future), some of these issues relate particularly to the plan period and it could potentially deliver around 1,500 homes with supporting infrastructure (primary school, a neighbourhood centre, and transport improvements) in the future (See *Housing Background Paper Part 2, Appendix A, p.31*). It is considered by the Council to be the best available option at present for longer term development beyond the plan period.

5.134 Each of these options was appraised as part of the Emerging Core Strategy (see appraisals of Policy CS18 and Policy CS19 in the SA Report 2014).

Options Rejected

5.135 Option PG36a: Land Partially in St Albans at Smallford was rejected, due to concerns around potential for coalescence between St Albans and Hatfield, the impact on Smallford, and loss of high quality agricultural land, as well as the potential for a major impact on J3 of the A1(M). In addition, the regional plan policy which provided for some of Welwyn Hatfield's growth to be provided in St Albans District no longer applies (see *Housing Background Paper Part 2 Appendix A, p.32*). Option PG36a was not subject to further detailed appraisal as it was not considered to be a reasonable alternative.

5.136 Option PG37: Most land within the broad location West of Ellenbrook and Roehyde was not considered suitable by Welwyn Hatfield BC to take forward into the Emerging Core Strategy for the reasons set out in *Housing Background Paper Part 2 Appendix A, p.32*): large areas are

severed from Hatfield by the A414 and the A1(M), it would not make a coherent extension to Hatfield, lies partly within Flood Zone 3, and has access and sewerage capacity issues, poor accessibility to schools, GP services and shops. However, one small part of this broad location was considered suitable as a possible urban extension but this would be taken forward in a Site Allocations DPD.

- 5.137 The appraisal of Option PG37 did not find any particular advantages of development at this location compared to the two options taken forward into the Emerging Core Strategy. Parts are potentially at risk of flooding (SA objective 2.2). It could significantly increase the Borough's contribution to greenhouse gas emissions and air pollution from traffic (SA objectives 4.2 and 4.3). It could have a significant effect on open space and landscape character (SA objective 4.4), although it is less likely to affect historic assets. It would have the potential to lead to the loss of best and most versatile agricultural land (SA objective 4.10). The size of development (estimated by WHBC to be of the order of 700 dwellings) that could be accommodated at this location would be less able than the preferred options to support investment in education facilities and the A414 and A1(M) would create a barrier to accessing existing shops, GP services, schools and the University of Hertfordshire (SA objective 6.6).
- 5.138 Option PG38: Land South of Hatfield was not taken forward as delivery for housing was in doubt due to a number of factors including the uncertainty that land would be available within the plan period due to plans for a strategic waste facility in this location, potential alternative use for a secondary school and road capacity. A large area adjacent Welham Green village is a Wildlife Site (see *Housing Background Paper Part 2, Appendix A, p.33*).
- 5.139 The appraisal of PG38 found that its main advantage over the other options considered for Hatfield was that it would not result in the loss of best and most versatile agricultural land (SA objective 4.10). However, much of the broad location is designated as a Wildlife Site and this means that the scale of development (WHBC estimate that 340 dwellings could be accommodated) would make less of a contribution to the Borough's housing need than the other options for Hatfield (SA objective 5.1). It performs slightly better with respect to health (SA objective 1.1) because it would be easier to encourage cycling and walking. It is also less likely than the other options to make a significant contribution to greenhouse gas emissions and air pollution from traffic due to its easier sustainable access to existing facilities and potential to encourage use of more sustainable modes of transport (SA objectives 4.2 and 4.3). As with the other options, the impact on open space and the landscape, including the character of Welham Green, could be significant (SA objective 4.4). The close proximity of the location to two locally designated wildlife sites brings with it the potential for significant adverse effects (SA objective 4.6).

Land for Housing Outside Urban Areas (LFHOUA) document in 2012

- 5.140 A consultation on potential site allocations ran in parallel to the ECS consultation, and included a call for sites, intended to inform a subsequent Site Allocations Development Plan Document. The identified sites were not subject to SA at that stage.

Local Plan Consultation Document 2015

- 5.141 Following the decision to prepare a local plan, smaller sites were considered alongside more strategic sites. The Council's regular Strategic Housing Land Availability Assessment reports provided updates on urban capacity sites.
- 5.142 Sites were identified in the Local Plan Consultation Document as more favourable, finely balanced and less favourable following consideration against a range of site assessment criteria applied by the Council; all were also subject to SA.
- 5.143 Members were minded to take forward the more favourable sites for allocation in the Local Plan. However, both the more favourable and finely balanced sites were required to meet the OAN as identified at the ECS stage.
- 5.144 The sites categorised as finely balanced and less favourable were included in an Appendix to the Local Plan Consultation Document.

5.145 The 2014 SA Report included at its Appendix 7, the Council's Statement of the reasons for the inclusion or exclusion of sites. The reasons for including or excluding strategic housing sites are provided below:

Reasons for including Strategic Sites: Favourable

- 5.146 WGC4 Panshanger Aerodrome – This site featured in the Emerging Core Strategy as a Broad Location for Growth (BLG1) and the Land for Housing Outside Urban Areas Consultation (LFHOUA) in 2012, and has been designated safeguarded land (i.e. safeguarded to meet future development needs) since 1993. Submissions from Sport England state that the site is of strategic regional importance for air sports. Now that the airfield has closed and given that the site has been safeguarded to meet future development needs, the council consider it appropriate to include the site in the consultation.
- 5.147 WGC5 Land to South East of Welwyn Garden City – Although WGC5 was also included in the LFHOUA consultation, it was not considered suitable at that time. Since then, technical information has been submitted to show that there is some development potential. The northern half of the site is included for consultation – it is closest to the town and existing facilities. There is insufficient evidence at the current time to demonstrate that the southern half of the site can be developed and therefore is not included.
- 5.148 Hat1 North West Hatfield – This site featured in the Emerging Core Strategy as a Broad Location for Growth (BLG2) and the LFHOUA consultation capable of delivering new facilities for the community. The site's capacity has now been reduced from 2,000 homes to 1,350, in order to reduce the impact on the strategic gap between Hatfield and Welwyn Garden City.
- 5.149 Hat2 West Hatfield – This site featured in the Emerging Core Strategy but as new safeguarded land to meet future development needs and the LFHOUA. In response to the Borough's increased housing need and longer plan period the site was included in the Local Plan Consultation Document, but its capacity has been reduced from 1,430 homes to 1,100 in order to reduce the impact on Ellenbrook Fields Country Park and the Green Belt.

Alternative Strategic Sites: Finely Balanced

- 5.150 The finely balanced sites included the following strategic sites:
- 5.151 Hat4 South of Ellenbrook – The site lies within a narrow, fragile gap between St Albans and Hatfield which would be further reduced and contributes to the national and local Green Belt purpose. Access to the site would be across flood zones 2 and 3 so a level 2 SFRA would be required.
- 5.152 Hat5 North of Roehyde – Hat5 has the same assessment as Hat4, to the north.
- 5.153 The less favourable sites were not considered to provide reasonable alternatives.
- 5.154 SA Appraisals for all sites considered in the Local Plan Consultation Document can be found at Annex 1 to the 2014 SA Report. Site summaries are provided at p.33 to p.54.

Proposed Submission Local Plan 2016

- 5.155 The Report to the Cabinet Housing and Planning Panel for the meeting on 13th June 2016 sets out the approach to the choice of sites for allocation in the Proposed Submission Local Plan, with detailed consideration for housing sites provided by the Housing Site Selection Background Paper 2016³⁰. It brings together the findings of the following evidence base studies to inform the proposed allocations in the Proposed Submission Local Plan:
- The Housing and Economic Land Availability Assessment (HELAA)
 - The Green Belt Study Review (Parts 1 and 2);
 - An appraisal of Green Belt boundaries;
 - The Sustainability Appraisal;
 - Flood Risk – all sites pass the Sequential Test;

³⁰ Housing Site Selection Background Paper 2016 <http://democracy.welhat.gov.uk/ieListDocuments.aspx?Cid=165&Mid=314&Ver=4>




- An appraisal of strategic advantages or disadvantages.
- Strategic infrastructure and cumulative impacts of allocating groups of sites (e.g. highway capacity/modelling findings, schools' capacity and their ability to expand).
- Site capacity and planning permissions.

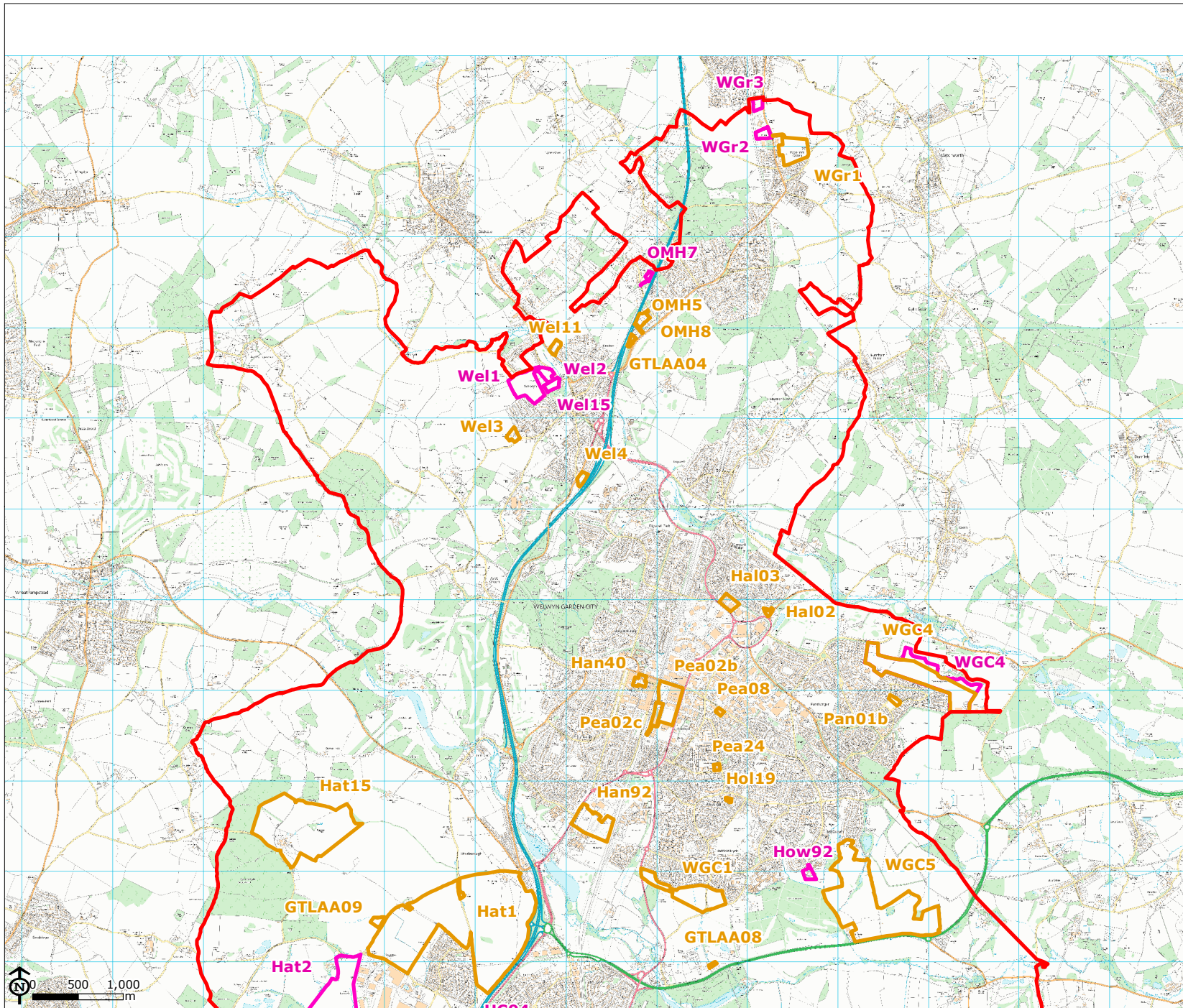
5.156 The proposed allocated sites and reasonable alternatives are shown in **Figures 5.2** and **5.3**.

5.157 The SA Findings for allocated sites and reasonable alternatives can be found in Chapter 6, with matrices at **Annex 1**.

Figure 5.2

Proposed Submission Local Plan: Allocated Sites and Reasonable Alternatives (North)

-  Welwyn Hatfield Borough
-  Allocated Site
-  Reasonable Alternative Site






Source: Ordnance Survey, WHBC

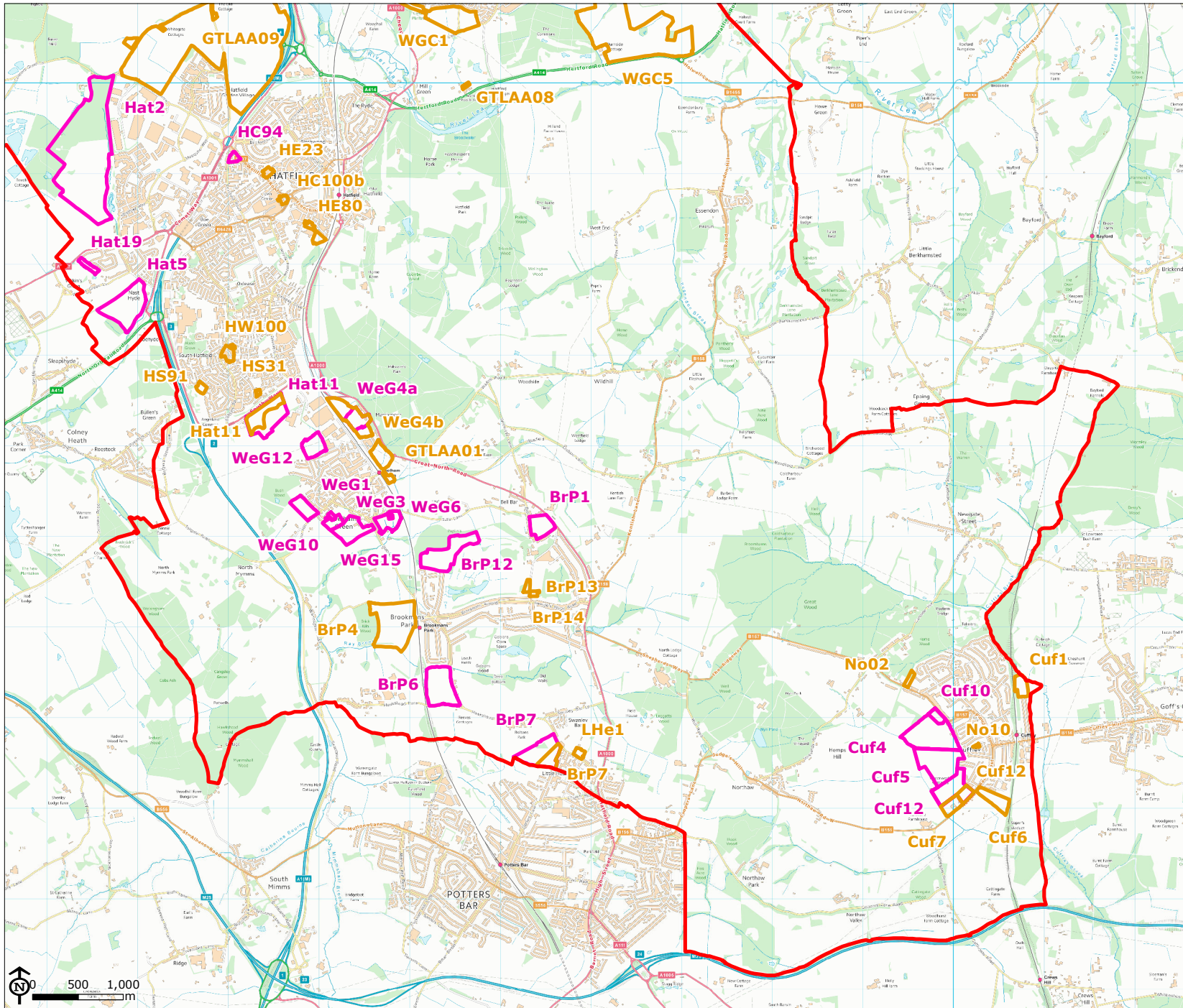
Map Scale @ A4: 1:60,000



Figure 5.3

**Proposed Submission Local Plan:
Allocated Sites and Reasonable Alternatives
(South)**

-  Welwyn Hatfield Borough
-  Allocated Site
-  Reasonable Alternative Site



Source: Ordnance Survey, WHBC

Map Scale @ A4: 1:60,000



Welwyn Garden City

- 5.158 The Housing Site Selection Background Paper 2016 states at para. 10.1 that a proportionate approach to distributing growth to the Borough's towns, excluded villages and rural areas suggests that Welwyn Garden City would need to accommodate between 5,652 and 6,018 additional dwellings between 2013 and 2032. Including housing completions since 2013, existing planning permissions, and proposed allocated sites, the total housing target in the Proposed Submission Local Plan for Welwyn Garden City is around 5,000 homes.
- 5.159 Two strategic sites within the urban area are proposed as allocations:
- SDS3 (Pea02b) Broadwater Road West SPD Site (North) (850 homes).
 - SDS4 (Pea02c) Broadwater Road West SPD Site (West) (171 homes; strategic employment site).
 - Together the two sites will provide 17,700 sqm employment space.
- 5.160 The following sites around Welwyn Garden City, which are either currently designated as Green Belt, or as an Area of Special Restraint, are proposed as strategic allocations:
- SDS1 (WGC4/7 Scenario 2) North East of Welwyn Garden City (Panshanger Area of Special Restraint) (650 homes)
 - SDS2 (WGC5) South east of Welwyn Garden City (1,200 homes).
 - A third large site, WGC1 Creswick (290 homes) is also allocated (this is identified as a 'key site' rather than a 'strategic site' but is mentioned here due to its size).
- 5.161 One strategic reasonable alternative site is identified for Welwyn Garden City: WGC4 (Scenario 3), the Panshanger Area of Special Restraint with the adjoining Green Belt Land (725 homes). However, Scenario 2 is preferred as Scenario 3 does not allow the possibility for air sports to return to the location at a future date in line with Sport England's concerns and recommendations.

Hatfield

- 5.162 Using a proportionate approach to distributing suggests that Hatfield would need to accommodate between 3,855 and 4,105 additional dwellings between 2013 and 2032 (Housing Site Selection Background Paper 2016, para. 11.1). Taking account completions since 2013 and sites with planning permission, this leaves a shortfall of 3,035-3,285.
- 5.163 The Council considers that the following sites around Hatfield within the Green Belt are suitable for allocation for development within the plan period, and have been identified as an allocation:
- SDS5 (Hat1/Hat13) North-west of Hatfield incorporating Astwick Manor Farm (1,650 homes).
 - HS11 (Hat11 Scenario 1) Land at Southway (120 homes)
- 5.164 A further strategic site is considered suitable for development beyond the plan period, but is not allocated this time for the reasons below (it is considered a reasonable alternative):
- Hat2 West of Hatfield (1,130 homes): Appendix B to the Housing Site Selection Background Paper 2016 states: *"The site could form a sustainable extension to the town of Hatfield as it is of sufficient size to provide a primary school and small neighbourhood centre, is accessible to a major Employment Area, and can be linked to the town by public transport and walking/cycle routes. It does however present the problem of significant encroachment into the Green Belt with a partially weaker new Green Belt boundary and the loss of a substantial part of Ellenbrook Fields Country Park as it currently exists. Furthermore the likely extraction of minerals will result in large parts of the remaining country park being largely inaccessible to the public for the plan period. Delivery of the site could also be delayed by the need to vary the existing S106 agreement relating to Ellenbrook Park and there is uncertainty as to whether all parties will agree to its variation. Accordingly, although the landowner has advised that earlier delivery could be possible, it is considered that whilst the site could be identified as safeguarded land to potentially be considered for housing beyond the plan period there is a degree of uncertainty over its deliverability."* In summary, Hat2 provides opportunity to safeguard the land to meet longer term needs but there is uncertainty as to whether the legal issues relating to the S.106 could be overcome. Taking the summary of benefits and impacts

into account, and the uncertainty relating to delivery, the Council decided not to allocate the site for development, or to identify it as safeguarded land.

5.165 The following sites were not considered suitable for allocation, but are considered to be reasonable alternatives:

- Hat11 (Scenario 2: 6ha employment site) Land at Southway: Scenario 1 for the site was preferred to Scenario 2 as Scenario 1 makes a contribution towards the OAN for housing for which there is a shortfall, and the need for employment land had been met by other more sustainable sites within the Borough.
- Hat11 (Scenario 3: 12.5ha mixed use site) Land at Southway: Scenario 1 for the site was preferred to Scenario 3 as Scenario 1 makes a contribution towards the OAN for housing for which there is a shortfall whilst also leaving a greater amount of land (in contrast to Scenario 3) in the south to create a substantial landscape buffer.
- Hat5 North of Roehyde (140 homes): on balance, the Council considered that the site's minor benefits do not outweigh the adverse impact on Green Belt purposes or the creation of an irregular Green Belt boundary.

Rural Areas and Villages

5.166 Proportionately the **rural areas** could be expected to accommodate around 606-645 additional homes over the plan period (Housing Site Selection Background Paper 2016, section 20).

5.167 The following strategic site is identified as a housing allocation in the rural areas (see Housing Site Selection Background Paper, section 20 and Appendix K):

- SDS6 (Hat15) Symondshyde – new village (1,130 homes). This site is located north west of Hatfield, between Hatfield and Wheathampstead. It was proposed by the landowner in 2015. The development would come forward within 6-15 years following minerals extraction, and the provision of sewerage and transport infrastructure (including a package of sustainable transport measures). The SA identified six significant positive effects and three significant negative effects. The site has constraints relating to its high landscape sensitivity (although views are largely contained by woodland to the south, west and north, and a ridge line following the western most public right of way) adjacent nature conservation and heritage assets, and the potential weakness of future Green Belt boundaries (care would be needed to avoid merging with Hatfield in the future). While not located close to a railway station, the site was found to have some positive benefits including being located within walking distance of an employment area and existing education establishments, and being able to provide a large number of homes (alongside a primary school, shop and community building). On balance, the Council supported its allocation, for the following reason: Opportunity to deliver a free-standing village and make a significant contribution to the need for housing alongside community infrastructure.

5.168 While it would more than meet the proportionate requirement for homes in the rural areas, this site is located close to Hatfield, and would assist in meeting the needs attributed to Hatfield.

5.169 While no strategic sites are identified within or adjacent to the **villages** for housing, the 'key sites' include several large allocations, of a similar size to some of the strategic sites in Hatfield and Welwyn Garden City. There is also a strategic employment site which includes a significant element of housing. These sites are listed below, as they are a key part of the settlement strategy to identify proportionate growth across the Borough, including around the larger villages which are excluded from the Green Belt.

5.170 The following allocations are identified in the Proposed Submission Local Plan:

- Woolmer Green: HS15 (WGr1) – Land east of London Road (150 homes). Reason for suitability (Appendix C of the Housing Site Selection Background Paper 2016): Potential adverse impacts on heritage assets can be overcome by suitable mitigation measures, as can potential impacts on residential amenity from noise arising from adjoining employment uses. The SA found many significant positive effects, and few significant negative effects. On balance, the site's benefits are considered to outweigh the adverse impacts on the purposes of the Green Belt, which could be minimized by reducing the northern extent of the site to align with the northern edge of the existing settlement boundary and allow for access.

- Welwyn: no larger sites, but two sites of 30 dwellings each (HS18/Wel11 & HS19/Wel4). The Council found that HS18's benefits were considered to outweigh the impact on the Green Belt. On balance, HS19's benefits are considered to outweigh the marginal impact of moving the Green Belt boundary within this fragile gap.
- Welham Green: SDS7 (WeG4b) – Marshmoor (strategic site for employment of 4.1ha, plus 80 homes). The SA found many positive effects and few negative effects. On balance, the provision of much needed employment land and its other benefits are considered to outweigh the adverse impacts on the Green Belt.
- Brookmans Park: HS22 (BrP4) – Land west of Brookmans Park Railway station (250 homes). The SA found few negative effects (the site has high landscape sensitivity and there are ecological sites nearby), and many positive effects, including proximity to the railway station, and is one of three sites which could deliver a new primary school for the village, enabling growth. On balance, the benefits of the site are considered by the Council to outweigh the adverse impact on the purposes of the Green Belt.
- Little Heath: HS24 (BrP7) – Land south of Hawkshead Road (100 homes). This is a finely balanced site and has been reduced to lessen the effect on maintaining the gap between Little Heath and Swanley Bar. The SA identified many more positive than negative effects. On balance, the Council considers the site's benefits marginally outweigh the adverse impacts on the Green Belt.
- Cuffley: six sites providing a total of around 300 homes, with the larger sites comprising:
 - HS28(Cuf6) – Land south of Northaw Road East (108 homes). The SA identified seven positives and no significant negative effects. The Council considers the site's benefits outweigh the harm to the purposes of the Green Belt.
 - HS29 (Cuf12) – Land north of Northaw Road East Wells Farm (73 homes). The SA identified three times more significant positive effects than significant negative effects. On balance, the adverse impact on the Green Belt and weak boundaries weigh against allocating the whole of the Cuf12 for development. However, restricting development to the frontage with the B156 as an infill site between Cuf7 and the existing urban boundary with Cuffley would have much less impact and on this restricted basis only, the council considered the site should be allocated.
 - HS30 (Cuf7) – Wells Farm (75 homes). This site is currently separated from the settlement boundary but is considered to form an acceptable site alongside Cuf12. The SA identified no significant negative effects, and many positive effects. On balance, the council considered that the benefits of the site were considered to support this allocation, provided Cuf12 is developed alongside it.

5.171 The SA findings for these sites, and the reasonable alternative sites around the villages are discussed in more detail in Chapter 6.

Topic Specific Policies

- 5.172 Topic specific strategic and development management policies are criteria based and cover: Transport and Travel, Centres, Services and Facilities, Housing, Economy, Quality of New Development, Environmental Assets and Infrastructure. Options and alternative approaches to these topics were outlined in the Issues and Options Consultation and the sustainability advantages and disadvantages presented. The strategic policies were developed further in the Emerging Core Strategy, and appraised again at this stage; some new policies were added which have also been subject to SA. This is discussed in more detail in Chapter 6. The intent of the topic specific policies in the ECS was largely supported.
- 5.173 The intention to include development management policies to sit below the strategic topic specific policies was referred to in the implementation section of the ECS. A list of the proposed policies was included in the Local Plan Consultation Document. The SA findings for the policies included in the Proposed Submission Local Plan are presented in Chapter 6.

Settlement Policies

- 5.174 The proposed settlement policies reflect the overall spatial strategy and distribution of development and identify strategy and key site allocations for Welwyn Garden City, Hatfield and the large excluded villages.
- 5.175 Settlement policies are provided for Welwyn Garden City and Hatfield, the larger villages, proposed new village and rural areas. Site specific policies are provided for strategic sites. Spatial policies list the allocated sites and cross refer to site specific considerations which are listed in tables within the supporting text.

Influence of the SA on the Plan

- 5.176 The SA Consultants (LUC) worked closely with the Borough Council officers throughout the plan preparation process. This has enabled the SA to play an influential role throughout, from influencing the overall strategy to the selection of sites for inclusion in the Proposed Submission Local Plan.
- 5.177 The SA Report of the Emerging Core Strategy recommended a more proportionate approach to the distribution of housing development, with allocations on the edge of the larger sustainably located villages to provide housing for local communities and support local services. It also highlighted the risk that seeking to deliver housing at levels significantly lower than the OAN would not meet local housing need, or assist with existing affordability problems.
- 5.178 The Proposed Submission Local Plan used the SA findings to inform the site selection process, alongside other evidence based studies, to identify suitable sites for allocation.

6 Sustainability Appraisal Findings

Regulation 12(2) of the SEA Regulations requires that:

“The report shall identify, describe and evaluate the likely significant effects on the environment of :

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”

Schedule 2(6) of the SEA Regulations requires the Environmental Report to consider:

“The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects, on issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the inter-relationship between the issues referred to in sub-paragraphs (a)–(l).”

Schedule 2(7) of the SEA Regulations requires the Environmental Report to consider:

“The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.”

Introduction

- 6.1 This section describes the findings of the SA of the Welwyn Hatfield Proposed Submission Local Plan, where relevant making reference to changes made since the Emerging Core Strategy (2012) and Local Plan Consultation Document (2015) were published.

Policy appraisal matrices

- 6.2 Each of the policies in the Proposed Submission Local Plan has been subject to SA. The SA matrices are included in **Annex 1**. It should be noted that not every policy has its own policy appraisal matrix. For those policies the primary purpose of which is to allocate sites for development, each individual site has its own site appraisal matrix.

Mitigation

- 6.3 The SA of the policies and the sites has been carried out using the SA Framework presented in **Chapter 4** of this SA Report. For sites, the assumptions used for each of the SA objectives in the SA Framework are presented in **Appendix 2**. The SA ‘likely effects’ scores for each policy or site are prior to mitigation provided by policies with the Proposed Submission Local Plan. The appraisal matrices set out those policies within the Proposed Submission Local Plan that will be used to avoid or reduce any significant negative effects identified, and these are also summarised below.

Reasonable alternatives

- 6.4 **Chapter 5** of this SA Report describes the evolution of the Local Plan, and the process by which the Council examined reasonable alternatives at each stage of the plan preparation process which were subject to SA. Not all of the policies have had reasonable alternatives identified. The focus has been on the Strategic Policies (the ‘SP’ policies), and in particular the level and distribution of growth and the specific sites where development is planned to come forward.

- 6.5 Where relevant, the reasonable alternatives considered in the SA are summarised in the text below. The detailed findings of the SA of reasonable alternatives can be found in the Core Strategy Issues & Options Report (2009), and the SA Reports for the Emerging Core Strategy (2012) and the Local Plan Consultation Document (2015).

Vision and objectives

- 6.6 The Vision and Borough-wide objectives provide the overall context for the Proposed Submission Local Plan policies, setting out the overarching aims for Welwyn Hatfield by 2032.

Alternatives considered

- 6.7 At the Issues and Options stage the following questions were asked of the draft strategic objectives:
- Option O1: Do you agree that the following could comprise the strategic objectives for the Local Development Framework?
 - Option O2: Would you suggest that any objectives should be deleted or amended? If yes, please comment accordingly.
 - Option O3: Would you suggest any new objectives? If yes, please comment accordingly.

SA findings

- 6.8 A large number of the effects identified are positive because of the aspirational nature of the vision and objectives. In particular, positive effects are likely in relation to SA objectives 1, 2, 3, 5 and 6. No significant positive effects are identified, however, because the vision and objectives are generally high level aspirations as opposed to the more specific policies elsewhere in the Proposed Submission Local Plan that will implement those objectives.
- 6.9 A number of mixed effects have also been identified, particularly in relation to SA objective 4 (improving the environment). This is because some of the Proposed Submission Local Plan objectives advocate development of a type and scale which could have a negative effect on the environment, e.g. as a result of increased greenhouse gas emissions. In this way, some of the objectives can be seen as potentially conflicting. A minor negative effect is identified in relation to SA objective 4.9 (minimising waste generation) because the extent of development encouraged through the vision and objectives means that there will inevitably be increases in waste generation. However, it is recognised that all development will be subject to other Local Plan policies which could provide mitigation for some of the potential negative effects identified in relation to the vision and objections, for example Policies SP 9: Place Making and High Quality Design and SP 11: Protection and Enhancement of Critical Environmental Assets.
- 6.10 The Proposed Submission Local Plan states that the Borough-wide objectives have been developed using national guidance, the findings of the Council's own evidence, and the responses received during consultation.

Delivering sustainable development

Alternatives considered

- 6.11 None. This is a standard policy that all Local Plans are required to incorporate under advice from the Planning Inspectorate.

Policy SP 1: Delivering Sustainable Development

- 6.12 This policy sets out overarching principles for sustainable development within Welwyn Hatfield, which will apply to development that comes forward under other Local Plan policies. It incorporates most of the 'model policy' suggested by the Planning Inspectorate, encouraging a proactive approach to planning positively for development.

- 6.13 In addition to the principles which were included in the equivalent policy of the Emerging Core Strategy, Policy CS1, the policy in the Proposed Submission Local Plan includes the principle of prioritising previously developed land when considering the location of new development.

SA findings

- 6.14 All of the likely effects identified are either positive or significantly positive, and no mixed or negative effects (minor or significant) have been identified.
- 6.15 A number of significant positive effects were identified in relation to SA objective 4: Improving the Environment, as the policy makes provision for ensuring that the natural environment is protected from the potential negative impacts of development. It aims to achieve a balance between environmental and economic concerns, and requires plans for growth to recognise environmental constraints and ensure that new development is environmentally sensitive. As such, significant positive effects have been identified in relation to conserving and enhancing local character and biodiversity (SA objectives 4.5 and 4.6). Further significant positive effects were identified in relation to the reduction of greenhouse gas emissions (SA objectives 4.1 and 4.2) because the policy requires new development to be located so as to minimise the need to travel and enable the use of public transport networks.
- 6.16 No mitigation is required, as there are no negative (minor or significant) effects associated with this policy. In fact, the policy has been identified as potentially providing mitigation for the likely effects of other Local Plan policies.

How much growth

Alternatives considered

- 6.17 For this section of the Proposed Submission Local Plan, the following Issues and Options alternatives SC31-SC35 and PG1-PG3 are relevant:
- Option PG1: Choose to keep roughly the same number of jobs in the Borough as we have now to create a match between jobs and housing?
 - Option PG2: Allow the number of jobs in the Borough to rise to reflect the number of new homes to be built?
 - Option PG3: Provide jobs for people in neighbouring areas as a way of promoting the Hatfield and Welwyn Garden City as a Key Centre for Development and Change?
- 6.18 Further SA work on the alternative levels of growth within the Borough over the plan period was carried out on the separate consultation on 'How Many Homes' (June-July 2011), Policy CS2: Meeting the Needs for Growth in the Emerging Core Strategy (May 2012), and a revised Policy CS 2: Meeting the Needs for Growth in the Local Plan Consultation Document (2015). This is summarised in Chapter 5 of this SA Report.

Policy SP 2: Targets for Growth

- 6.19 Policy SP 2 aims to meet the needs for growth in relation to housing, employment land and retail floorspace, which are consistent with the Local Plan's vision, objectives and the principles of sustainable development (Policy SP 1). The policy aims to support economic growth and maintain the current balance between jobs and homes in the Borough by identifying that 294.1ha of employment land between 2013 and 2032, including provision for 116,400 sq.m of new floorspace for industry, offices and warehousing over the plan period from designated employment areas and mixed use sites. Policy SP 2 states that opportunities have been identified to deliver a Borough-wide housing target of around 12,000 homes, between 2013 and 2032. The policy also identifies the delivery of around 1,350 new dwellings on land to the east of Welwyn Garden City but within the administrative area of East Herts, which would act as an extension to Welwyn Garden City and help to meet the need for housing within East Herts and within the Welwyn Hatfield Housing Market Area.
- 6.20 The policy sets out a target for the provision of a net increase of around 330 bed-spaces for specialist (Class C2) residential or nursing care between 2013 and 2032. It also identifies

opportunities to facilitate the provision of 12,500 sqm of retail floorspace to meet predicted expenditure growth in the Borough to 2026 through the allocation of sites and existing permissions.

- 6.21 Further to the above, the policy sets out that the council will resist any net loss in the borough's stock of dwellings, authorised permanent gypsy and traveller sites and the travelling showpeople site, allocated employment land, and retail floorspace in the Borough's town, neighbourhood and village centres.

SA findings

- 6.22 In relation to housing (SA objective 5.1), it is judged that this policy will make a significant positive contribution and a real step to delivering the required amount of housing to meet demand and need. However, as the target is around 600 homes below the lower end of the OAN range, a mixed significant positive and minor negative effect is identified, with uncertainty also attached to achieving the required build rates.
- 6.23 The Proposed Submission Local Plan identifies 294ha of employment land, with a shortfall of 5.4ha to be met through the allocation of a greenfield site at Marshmoor. It should be noted, however, that the Proposed Submission Local Plan is planning for about 22,000 sqm short of the 138,000 sqm of employment floorspace recommended in the Economy Study Update, which means that SA objective 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) receives a mixed (significant positive/minor negative) score. Minor positive effects are predicted in relation to increased access to training opportunities (such as apprenticeships) associated with growth in employment (SA objective 6.6), and indirect positive effects are predicted in relation to the health of those living in areas of deprivation which would benefit from regeneration, such as Hatfield town centre (SA objective 1.1). A significant positive score is identified for town centre vitality (SA objective 6.3) as the policy states new retail floorspace will be located within existing centres, and new centres as part of strategic allocations, and the supporting text refers to the Council's strategy to maintain and enhance the vitality and viability of the Borough's town, neighbourhood and village centres. The policy also includes provision for development in and around villages excluded from the Green Belt which is expected to have a positive effect in sustaining rural communities and their economies. However this is uncertain as the protection of rural character will depend on the location of development and this is dealt with under the appraisals of other policies.
- 6.24 However, planning for growth on this scale could potentially lead to significant negative effects in relation to SA objectives which seek to reduce greenhouse emissions from built development and transport (SA objectives 4.1, 4.2), and to reduce air pollution from traffic (SA objective 4.3) and water consumption (SA objective 4.7). Mitigation will include other Proposed Submission Local Plan policies (e.g. SP 10: Sustainable Design and Construction) and technological improvements which may reduce air pollution from traffic. A significant negative effect, but with some uncertainty, may occur in relation to avoidance of water pollution (SA objective 4.8). Mitigation is provided by policies requiring provision of SuDS and upgrades to sewerage infrastructure but uncertainties exist as not all locations are suitable for SuDS and WwTW upgrades may face technical challenges in meeting required discharge quality standards.
- 6.25 Potentially significant negative effects from this policy on landscape character (SA objective 4.4) could arise, given the loss of greenfield land for housing and associated infrastructure. The scale of new housing development has the potential to significantly alter the landscape setting of existing towns and villages and the wider countryside and will require investment in masterplanning to avoid negative impacts on landscape character. This results in significant negative / uncertain effects on landscape character from this policy, the effects of development in particular locations being separately assessed. Potential negative effects are likely to be reduced by Policy SADM 16: Ecology and Landscape, and site specific policies. Positive effects that could incur include the potential for development on this scale to fund the creation and enhancement of green infrastructure to serve the growing population.
- 6.26 Uncertain effects are predicted in relation to settlement character, sense of place and historic / cultural assets (SA objective 4.5). The large scale of new development proposed has the potential to significantly alter the character of some of the larger existing settlements and historic and cultural assets associated with them. Potential negative effects are likely to be reduced by

Policies SP 9: Place Making and High Quality Design, SP 11: Protection and Enhancement of Critical Environmental Assets, SADM 15: Heritage, SP 15: The Historic Environment of Welwyn Garden City and policies for locations of growth, SP 16: Welwyn Garden City Town Centre Strategy and SADM 19: Town Centre North Development Site (MUS1). Effects on character and sense of place from Policy SP 2 in isolation are therefore uncertain as they will depend on location, masterplanning / layout and design quality of new development and how these respond to existing character. The effects on character and sense of place of particular development locations are assessed separately under the relevant policies.

- 6.27 Significant negative effects are predicted in relation to the conservation and use of productive agricultural land (SA objective 4.10) however the effect is uncertain as it depends on the location of developments. Mitigation measures will be implemented through Local Plan policies (e.g. SP 10: Sustainable Design and Construction, SP 11: Protection and Enhancement of Critical Environmental Assets, and requirements for landscaping in spatial policies). Potential minor negative effects are predicted in respect of the SA objective on flood risk (SA objective 2.2) due to the possibility of increased run-off, although the requirement for SuDS in policy SADM 14 should ensure that effects are minor. Biodiversity is predicted to experience mixed uncertain effects, with the potential for negative effects through loss and fragmentation of habitats as a result of development potentially compensated for by positive effects through habitat enhancement / creation delivered as part of new development (SA objective 4.6).
- 6.28 All other scores identified were either negligible or non-applicable to the assessment of this policy.

Settlement Strategy and Green Belt Boundaries

Alternatives considered

- 6.29 Issues and Options alternatives PG4-PG8 and PG29-PG32 relate to the development of the policies in this section of the Proposed Submission Local Plan.
- Option PG4: PG4. Locating new employment provision where it has the best chance of fitting with the Borough's role as a key economic driver in the East of England. Should we do this by:
 - (a) Focusing on expansion in knowledge-based industries, perhaps by encouraging further development of such industries close to the University of Hertfordshire's existing facilities for innovation in knowledge based industries (one option for this could be west of Hatfield, potentially in St Albans district).
 - OR
 - (b) Focusing on strategic distribution warehousing on new sites for employment use.
 - Option PG5: Ensuring that there is a range of types of job in the Borough to meet the needs of local people in close proximity to where they already live. For example, by making provision for smaller businesses to help maintain a mix of types of employment offer and to ensure that larger businesses can be serviced locally? This would imply continuing the existing approach of encouraging the recycling of sites in existing employment areas for new employment and also providing new employment opportunities as part of new neighbourhoods located in urban extensions. Part of this strategy would involve aligning the number of jobs in the Borough with the number of economically-active residents.
 - Option PG6: Focusing our efforts on regenerating employment provision in declining areas to address the needs of people living in deprived areas. Part of this approach could involve encouraging the provision of training facilities within existing employment areas to enable on-the-job training to take place.
 - Option PG7: Protecting employment provision in villages and other rural parts of the Borough to provide job opportunities for people living in those areas.
 - Option PG8: A mixture of strands a, b, c and d above.
 - Option PG29: Do you consider that preventing the coalescence of our towns and smaller settlements, in order to maintain their distinct character and identity, should be a priority?

- Option PG 30: Do you consider that the coalescence of towns and smaller settlements need not be a barrier to housing growth and should be planned for?
- Option PG31: Should the main focus for housing growth be in and around Welwyn Garden City and Hatfield with the large villages of Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands and Mardley Heath, Welham Green, Welwyn and Woolmer Green also having to accommodate some limited housing growth?
- Option PG32: If growth is not proportionately distributed between all of the Borough's towns and larger villages, should it be located in areas of large scale urban expansion focused around either, or both, Welwyn Garden City and Hatfield?

6.30 Following on from the above, detailed SA work was carried out with respect to draft policy including Policy CS 3: Settlement Strategy, alternative spatial options strategies, plus broad locations for growth at the Emerging Core Strategy stage (2012), followed by SA of a range of alternative sites at the Local Plan Consultation Document stage (2015). The work carried out is described in more detail in Chapter 5 of this SA Report.

Policy SP 3: Settlement Strategy and Green Belt Boundaries

- 6.31 The Settlement Strategy sets out the approach to the distribution of development over the plan period. Consistent with the settlement hierarchy, the primary focus for new development will be in and around Welwyn Garden City and Hatfield where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities, and to create new neighbourhoods with supporting infrastructure.
- 6.32 The secondary focus for development will be in and around the excluded villages at a more limited scale, compatible with the more limited range of job opportunities, shops, services and other facilities available in these locations. A location for a new village at Symondshyde to the north-west of Hatfield has been identified on the Policies Map.
- 6.33 A new neighbourhood for around 1,300 new dwellings plus associated development is also supported on land to the east of Welwyn Garden City but within the administrative area of East Herts, provided development here is supported by efficient levels of social, physical and green infrastructure and is successfully connected to and integrated with Welwyn Garden City.
- 6.34 In villages and other rural areas of the Borough that lie within the Green Belt, development will be restricted so as to be consistent with the type of development envisaged in national planning policy and other policies of this plan.
- 6.35 Development that would result in disproportionate growth to any of the settlements, conflict with the function and position of a settlement within the hierarchy, which cannot be supported by the necessary infrastructure or result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted.

SA findings

- 6.36 Several significant positive effects have been identified for Policy SP 3. The more proportionate distribution of development is likely to have positive impacts on housing supply and on the supply and quality of sites for business uses across the Borough and should help to meet the needs of more urban and rural businesses for sites and premises. The more proportionate distribution of development will also support investment in the excluded villages supporting their services and employment opportunities, and encourage living within the town centres and will support the function of the retail centres. Therefore a significant positive effect is expected for SA objective 5.1 (housing), SA objective 6.1 (supply, location and quality of employment sites), SA objective 6.2 (encourage economic investment in those areas most in need of regeneration) and SA objective 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres).
- 6.37 Neither of the existing urban areas of Welwyn Garden City and Hatfield are generally subject to fluvial flood risk so development within the existing urban areas should help to avoid increasing flood risk resulting in a significant positive for SA objective 2.2 (flood risk). A more proportionate distribution of development is also likely to lead to greater access to, and the potential for investment in, health and education facilities and services throughout the Borough, resulting in a

minor positive effect for SA objective 1.1, SA objective 1.2 (health) and SA objective 6.6 (provide access to training, skills development).

- 6.38 A more proportionate distribution of development is considered to have mixed impacts on SA objective 4.2 (greenhouse gas emissions from transport) and 4.3 (air pollution). Directing development to Welwyn Garden City and Hatfield is likely to continue to lead to positive impacts as accessibility to strategic transport and public transport is good and the greatest potential exists to integrate different modes of transport in the main towns, and reduce reliance on the car. However, directing a greater proportion of development to smaller settlements in the Borough (and the creation of a new settlement) may create additional car dependent developments.
- 6.39 With the majority of development directed to sites in and around Welwyn Garden City and Hatfield, the effect on landscape character and local distinctiveness (SA objective 4.4) is likely to be positive, although the need for urban extensions to accommodate development would potentially result in significant negative impacts on landscape and open space. The policy states that development that would result in disproportionate growth to any of the settlements in the settlement hierarchy will be resisted, minimising the risk of negative impacts on the existing settlement pattern and character. The focus for development will be 'in and around' the towns and villages, which signals that the use of previously developed land has been prioritised in devising the settlement strategy.
- 6.40 A mixed effect is also expected for heritage assets (SA objective 4.5). A greater proportion of development directed towards the excluded villages could have a significant negative impact on their sense of place and local distinctiveness, although there will be a requirement for good quality design to respond to local character so the potential for impact would be limited. Furthermore, directing development towards Welwyn Garden City and Hatfield would help to minimise potential negative impacts on biodiversity and geodiversity (SA objective 4.6), but with an increased housing target and with a number of nationally and locally designated sites in the Borough located in close proximity to many of the excluded villages and rural areas, a more proportionate distribution of development is considered to have a negative impact on this objective. However, the degree of the impact will depend on the scale, location and design of development and so remains an element of uncertainty.
- 6.41 An uncertain minor positive effect is expected for SA objective 4.9 (minimising waste generation) and objective 4.10 (conservation and sustainable use of land). Directing development to Welwyn Garden City and Hatfield, and allocating previously developed sites in both towns and in the larger villages has the potential to make efficient use of previously developed land. Buildings may also be re-used and materials recycled, but this will depend on site characteristics.
- 6.42 An uncertain effect is expected in relation to SA objective 4.8 (avoid water pollution). The additional development that will need to take place on greenfield land could lead to increased urban run-off and if not managed well, runs the risk of pollution to sensitive watercourses in the borough. The Proposed Submission Local Plan seeks to address such risks, however there is an element of uncertainty regarding delivery.
- 6.43 The policy allows for more growth in the excluded villages than previously, resulting in greater support for rural communities and a minor positive effect for SA objective 6.4 (sustain rural communities), however development that comes forward will need to be compatible with the scale and character of the villages, so an element of uncertainty remains.
- 6.44 All other scores identified were either negligible or non-applicable to the assessment of this policy.

Policy SADM 1: Windfall Development

- 6.45 This policy permits planning permission for residential development on unallocated sites provided that certain criteria are met. The majority of the Borough's housing land supply is expected to come forward on allocated sites, however windfall development can make a valuable contribution towards the Borough's housing and other land-use land supply.

SA findings

- 6.46 The policy facilitates the delivery of housing development on unallocated sites resulting in a significant positive effect for SA objective 5.1 (housing). Planning permission for this windfall development will only be granted provided the site is previously developed, or is a small infill site

within a town or excluded village. Therefore a significant positive effect is also expected for SA objective 4.10 (conservation and sustainable use of land).

- 6.47 A minor positive effect is expected for SA objective 4.2 (greenhouse gas emissions from transport) and 4.3 (air pollution). Windfall development will only be granted provided the development will be accessible to a range of services and facilities by transport modes other than the car. This is likely to reduce the reliance and need to travel by private car, and this would reduce the associated greenhouse gas emissions and air pollution. By ensuring that housing on unallocated sites will be confined to previously developed sites, or small infill sites within a town or excluded village, the policy helps to protect the characteristics of the existing countryside resulting in a minor positive effect for SA objective 4.4 (landscape character).

Summary of SA scores

- 6.48 The SA scores for the Proposed Submission Local Plan Vision, Objectives, Growth and Settlement Strategy are shown in **Table 6.1**.

Table 6.1: Summary SA scores for the Proposed Submission Local Plan Vision, Objectives, Growth and Settlement Strategy

SA Question: Will the policy...	Vision and Objectives	SP1	SP2	SP3	SADM 1
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	+	+	+	+	0
...lead to improved health for all? (1.2)	+	+	0	+	0
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	+?	+	0	0	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	+	+	-	++	0
...encourage involvement of the public in the planning process? (3.1)	+	+	0	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	+/-	++	--	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	+/-?	++	--	+/-	+
...avoid and reduce air pollution? (4.3)	+/-?	+	--	+/-	+
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+/-?	++	--/--?/+	++/--?	+
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	+	++	?	+/-	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	+	++	-/?/+	+/--?	0

SA Question: Will the policy...	Vision and Objectives	SP1	SP2	SP3	SADM 1
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	+	++	--	0	0
...avoid water pollution? (4.8)	+	+	--?	?	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	-?	+	0	+?	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	+	+	--?	+?	++
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	+	0	++/-?	++	++
...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)	+	+	++/-?	++	0
...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)	+	+	0	++	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	+	+	++	++	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	-/+	+	+/?	+/?	0
...avoid the sterilisation of mineral resources? (6.5)	+?	+	0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	+	0	+	+	0

Movement

Alternatives considered

- 6.49 Issues and Options alternatives PG21 and PG22 relate to the development of policies in this section of the Proposed Submission Local Plan.
- Option PG21: Should our strategy seek to maximise opportunities to reduce the adverse impacts of travel as much as possible? This would require a major shift in travel patterns away from car dependency to more sustainable modes of travel including walking, cycling, bus, coach and train.
 - Option PG22: Taking into account other sustainability objectives and the likely availability of resources to invest in necessary infrastructure, should our strategy seek to introduce a package of measures to conform with national and regional requirements whilst seeking to provide solutions to current problems.
- 6.50 SA work was subsequently carried out on a draft Strategic Movement policy that was included in the Local Plan Consultation Document (2015).

Policy SP 4: Transport and Travel

- 6.51 This policy seeks to support development with appropriate transport infrastructure, with the emphasis on promoting the use of sustainable modes of travel and improving safety for all highway users.

SA findings

- 6.52 The policy is considered to have a significant positive effect on SA objectives 1.1 and 1.2 as it intends to emphasise the promotion of sustainable modes of travel, with the policy justification for the policy referencing the provision of new or improved cycling and walking routes which will in turn promote more active, and therefore healthier, communities.
- 6.53 A significant positive effect is likely for SA objective 4.2 (reduce greenhouse gas emissions from transport) and SA objective 4.3 (avoid and reduce air pollution) as improved opportunities for and an emphasis on sustainable modes of transport could reduce greenhouse gas emissions and air pollution from vehicle transport.
- 6.54 The justification for the policy set out in the Proposed Submission Local Plan stipulates that the growth strategy should promote the use of rail and bus services where appropriate, as well as providing for new or improved cycling and walking routes. Whilst this policy does not specifically require development proposals to make provisions for sustainable transport modes, it is acknowledged that such requirements are set out in the development management policies such as Policy SADM 3: Sustainable Travel for All. A reduction in greenhouse gases could therefore be achieved and as such the policy is considered likely to have a minor positive effect on SA objective 4.1 (reduce greenhouse gas emissions from built development).
- 6.55 For SA objective 4.4 (protect and enhance open space, landscape character and local distinctiveness) the policy is likely to have an uncertain minor positive effect as the provision of green infrastructure in the form of walking/cycle routes could increase the amount of publicly accessible open space.
- 6.56 The policy is likely to have a mixed effect on SA objective 4.6 (protect and enhance biodiversity and geodiversity, taking into account the effects of climate change) as the provision of any green infrastructure as a result of the promotion of sustainable transport through new walking and cycling routes should have a positive effect on biodiversity, however the increase in the use of any green space for recreation could result in habitat degradation.
- 6.57 Although the policy does not relate directly to employment development it does provide criteria that also relate to employment sites and therefore a minor positive effect is likely for SA objective 6.1 (supply, location and quality of employment sites).
- 6.58 A minor positive effect is also likely for SA objective 6.3 (town centre vitality) as the policy aims to provide sustainable transport/access to new developments which applies to all development

within the Borough including the town centres. The policy is not expected to have a direct impact on objective 6.4 (sustain rural communities). However, a minor positive effect is expected as it supports economic growth in general.

Policy SADM 2: Highway Network and Safety

- 6.59 The purpose of this policy is to manage the growth in traffic on the highway network resulting from development in the interests of highway safety and maintaining highway capacity. Development which is likely to generate significant movement and travel demand must be assessed comprehensively in terms of its impact on the transport network.

SA findings

- 6.60 A minor positive effect is expected for health (SA objective 1.1 and SA objective 1.2). The policy seeks to manage the growth of traffic on the highway network, which should help to address traffic emissions. This would provide opportunities for more sustainable modes of transport such as walking and cycling which would help to promote more active, and therefore healthier, communities. It also aims to ensure no negative impacts on highway safety. Measures to reduce car use will also benefit levels of greenhouse gas emissions and reduce air pollution, resulting in a minor positive SA objective 4.2 (greenhouse gas emissions from transport) and 4.3 (air pollution).

Policy SADM 3: Sustainable Travel for All

- 6.61 This policy encourages sustainable means of transport. Development proposals should make provision for cyclists, pedestrians, public transport, community transport, servicing and emergency vehicles, and facilities for charging plug in and other low emission vehicles. The policy also states that all developments at or above the thresholds set out in Hertfordshire County Council's Hertfordshire Travel Plan Guidance will be required to submit a Travel Plan as part of a planning application. This should outline the way in which the transport implications of new development will be managed in order to ensure that there is minimal environmental, social or economic impact.

SA findings

- 6.62 A significant positive effect is expected for SA objective 4.2 (greenhouse gas emissions from transport) and 4.3 (air pollution). This policy is likely to reduce the reliance and need to travel by private car, which would reduce the associated greenhouse gas emissions and air pollution.
- 6.63 Minor positive effects are expected for SA objectives 1.1 and 1.2 (health). This policy is likely to encourage people to lead more active lifestyles through promoting the use of sustainable modes of transport such as walking and cycling as an alternative to private cars. This would also have benefits on health through reduced traffic emissions. A minor positive effect is expected for SA objectives 6.2 (encourage economic investment in those areas most in need of regeneration), 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres), 6.4 (sustain rural communities and their economies) and 6.6 (provide access to training, skills development). An enhanced and better integrated transport network across the Borough will improve equality of access to transport for everyone, including those in rural locations and in areas in need of regeneration. It will also improve connectivity to retail centres and services and facilities.

Summary of SA scores

- 6.64 The SA scores for the Proposed Submission Local Plan section Movement are shown in **Table 6.2**.

Table 6.2: Summary SA scores for Movement

SA Question: Will the policy...	SP4	SADM 2	SADM 3
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	++	+	+
...lead to improved health for all? (1.2)	++	+	+
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	0	0	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0	0
...encourage involvement of the public in the planning process? (3.1)	0	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	+	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	++	+	++
...avoid and reduce air pollution? (4.3)	++	+	++
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+	0	0
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	0	0	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	+/-	0	0
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0
...avoid water pollution? (4.8)	0	0	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	0	0	0
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	0	0	0
...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)	+	0	0
...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)	0	0	+
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	+	0	+
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	+	0	+
...avoid the sterilisation of mineral resources? (6.5)	0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	0	0	+

Centres, services and facilities

Alternatives considered

- 6.65 Issues and Options alternatives SC10-SC14, PG17-PG20 and PG23-PG24 relate to the development of policies in this section of the Proposed Submission Local Plan.
- Option SC10: As a general principle in developing these standards will it be appropriate to reduce the size threshold for teenage provision so that a more comprehensive network of provision can be made
 - Option SC11: Should the FIT space standards set out in Table 4 above be a guiding principle so that provision for teenagers is only made in the larger areas of open space
 - Option SC12: Use the recommended standards for outdoor sports facilities identified in table 5 as the basis for future provision?
 - Option SC13 Set a higher standard of 2.12 ha per 1000 people reflecting the current level of provision in the Borough
 - Option SC14 Can you suggest any alternative standards?
 - Option PG17 Taking opportunities to improve existing nearby neighbourhood centres where significant amounts of new housing are provided in an area.
 - Option PG18: Providing new neighbourhood centres with shops and community facilities, even where this results in an existing neighbourhood centre closing down and its catchment being served by the new neighbourhood centre.
 - Option PG19: The Council pursue a strategy of improving the evening economy of both Hatfield and Welwyn Garden City town centres?
 - Option PG20: If yes, do you think we should have a strategy to identify specific areas of the town centres for the evening economy?
 - Option PG23 Should provision for additional burial space be made within the Borough to meet the estimated demand for burial space beyond 2018 until 2038?
 - Option PG24 Should no further provision be made for burial space within the Borough beyond 2018, meaning that burials beyond this date would have to take place outside the Borough?
- 6.66 Subsequent SA work was carried out with respect to draft policies in the Emerging Core Strategy (2012):
- Policy CS5: Retail Development.
 - Policy CS6: Community Services and Facilities.
- 6.67 Two options for cemetery sites were put forward at the Local Plan Consultation Document stage (2015), one at Southway, Hatfield and one West of Welwyn Garden City. Both site options were expected to have significant positive effects on reducing greenhouse gases and air pollution and creating open space. All other effects were considered to be minor.
- 6.68 The only difference in the scores for the site were in relation to SA objective 4.5 (heritage) with the site west of Welwyn Garden City having mixed effects due to the proximity of heritage assets and the site at Southway, Hatfield having negligible effects. Because of this, the site at Southway, Hatfield performed slightly better than the site west of Welwyn Garden City.

Policy SP 5: Quantity and Location of Retail Development

- 6.69 Policy SP 5 provides for retail development at appropriate scales according to the retail hierarchy which accompanies the policy, and encourages a mix of other town centre uses (such as restaurants and pubs) to support a balanced evening economy. A sequential approach is set out which favours in-centre locations. Neighbourhood centres will be developed and regenerated.

SA findings

- 6.70 Policy SP 5 is expected to have significant positive effects on the SA objectives which seek to support the vitality and attraction of Welwyn Garden City and Hatfield town retail centres (SA objective 6.3), and sustain rural communities (SA objective 6.4).
- 6.71 No significant negative or uncertain effects are predicted in relation to Policy SP5.

Policy SADM 4: Development in Designated Centres

- 6.72 This policy states that within the defined boundaries of centres, proposals for new development or changes of use will be supported, subject to them not having a detrimental impact on the vitality and viability of that centre. Proposals will be resisted where they result in the loss of a use or a facility which can attract people to the centre or which directly serves the centre, unless it can be demonstrated that there is no longer any need for that use or facility. It is important to have a vibrant mix of retail, service and leisure facilities to support both the Borough's economy.

SA findings

- 6.73 A significant positive effect is expected for SA objectives 6.1 (ensure the supply, location and quality of business and employment sites), 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres), and 6.4 (sustain rural communities and their economies). The policy will help to support the delivery of a vibrant mix of retail, service and leisure facilities to support the economy in designated centres, which may also help to regenerate and renew disadvantaged areas.
- 6.74 A minor positive effect is expected for SA objective 2.1 (crime and anti-social behaviour) as the policy is likely to reduce the number of empty buildings which could otherwise encourage antisocial behaviour. The use of vacant units, and the possible employment options they might offer, might also help to regenerate and renew disadvantaged areas within the town centre resulting in a minor positive effect for SA objective 6.2 (encourage economic investment in those areas most in need of regeneration). This policy seeks to ensure the vitality and viability of town centres, which should help to improve the urban landscape and ensure the character of the town centre is protected. Therefore a minor positive effect is expected for SA objective 4.4 (landscape character) and SA objective 4.5 (heritage assets). A minor positive is also expected for SA objective 4.10 (conservation and sustainable use of land) as the policy will permit a change in use to ensure that the existing facility is reused should it be found to be no longer viable.
- 6.75 A mixed effect is expected for SA objective 4.2 (greenhouse gas emissions from transport) and 4.3 (air pollution). The policy may result in an increase in traffic around town centres, which could lead to an increase in congestion and vehicle emissions. However, by concentrating commercial uses within existing town centres, it can be argued that they will be readily accessible through the use of more sustainable modes of transportation. However, in both cases the mixed effect is uncertain as it will depend primarily on travel choices made by residents.

Policy SADM 5: Development outside Designated Centres

- 6.76 This policy states that proposals which result in the loss of individual convenience shops outside designated centres will be resisted. In addition, proposals for new retail development in out-of-centre locations (including the extension of existing retail stores) will be resisted, except for Individual Convenience Shops below 280sq.m. In rural parts of the Borough which are further from the designated retail centres, individual convenience shops fulfil an important day-to-day retail role. These shops remain easily accessible to the communities they serve, reducing the need to make avoidable trips by car to other centres elsewhere.

SA findings

- 6.77 A significant positive effect is expected for SA objective 6.4 (sustain rural communities and their economies). By resisting the loss of convenience shops, the policy is supporting an important day-to-day retail role meeting the needs of the local community. Having these services within the community reduces the need to make avoidable trips particularly by car to other centres elsewhere, reducing greenhouse gas emissions and air pollution. Therefore a minor positive effect is expected for SA objective 4.2 (reduce greenhouse gas emissions from transport), and SA objective 4.3 (air pollution). A minor positive effect is also expected for SA objective 4.10 (conservation and sustainable use of land) due to the policy permitting a change in use to ensure

that the existing facility is reused when the original use is no longer viable. Benefits for the economy are expected due to the policy helping to maintain the role and functionality of the town centres and local centres. Therefore minor positive effects are likely for the following economy related SA objectives: 6.1 (ensure the supply, location and quality of business and employment sites), 6.2 (encourage economic investment in those areas most in need of regeneration) and 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres).

Policy SADM 6: Shopfronts, Adverts and Signage

- 6.78 This policy requires all proposals for advertisements, signs, new and altered shopfronts, canopies, blinds, shutters and other security measures to be of a high standard of design and incorporate the design principles and policies in the Plan and the Council's Supplementary Design Guidance. The policy will seek to ensure that proposals will not detrimentally affect the character and appearance of an area. Furthermore, well designed shopfronts, adverts and signs can have a positive impact on the character and appearance of the Borough's retail areas.

SA findings

- 6.79 A minor positive effect is expected for SA objective 4.4 (protect and enhance open space and landscape character) and SA objective 4.5 (heritage assets) as the policy seeks to protect and enhance cultural heritage features, and the townscapes of the Borough. The policy should help improve the public realm and character of commercial areas, adding to the interest and vibrancy of town centres. Therefore a minor positive effect is also expected for SA objective 6.2 (encourage economic investment in those areas most in need of regeneration) and SA objective 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres).

Policy SP 6: Community Services and Facilities

- 6.80 Policy SP 6 aims to ensure communities can easily access a range of community services and facilities (including community centres and village halls, facilities for sport, leisure and play, shops, libraries, cultural facilities, etc.) by protecting and enhancing existing facilities and promoting new facilities where these are required.

SA findings

- 6.81 Policy SP 6 is expected to have significant positive effects on health (SA objective 1.2) as it seeks to ensure that communities can easily access a range of community services and facilities (which includes healthcare facilities) through a range of measures such as guarding against the loss of facilities, expansion and enhancement etc. The policy also includes additional measures specifically for sport and recreation, recognising these facilities as important for enabling people to live healthy and active lifestyles. It also seeks to upgrade sport and recreation facilities, provide new facilities and facilitate schemes to open up private or restricted facilities to the public.
- 6.82 No significant negative or uncertain effects are predicted from this policy.

Policy SADM 7: New Community Services and Facilities and Losses of Community Services and Facilities

- 6.83 This policy supports the retention of existing, and the provision of new, community services and facilities. Where there is a proposal for a facility to be lost and not replaced, it will be necessary to demonstrate that there is no prospect of demand for that facility arising with a reasonable timescale.

SA findings

- 6.84 A significant positive effect is expected for SA objectives 1.1 1.2 (health). The provision of new or improved facilities, with increased accessibility would encourage greater use of facilities, helping to improve the health and wellbeing of the Borough's residents.
- 6.85 Minor positive effects have been identified in relation to SA objective 2.1 (crime and anti-social behaviour), as the retention and creation of community facilities is important for social well-being and could contribute to a reduction in crime, especially amongst young people. The policy is likely to reduce the reliance and need to travel by private car, particularly if access to services and facilities is made easier, and this would reduce the associated greenhouse gas emissions and air pollution resulting in a minor positive effect for SA objective 4.2 (reduce greenhouse gas emissions from transport) and SA objective 4.3 (air pollution).

- 6.86 If community facilities are tailored to the needs of the area in this way then it is likely that more disadvantaged areas will be renewed through the provision of improved facilities. Therefore a minor positive effect is expected for SA objective 6.2 (encourage economic investment in those areas most in need of regeneration). A minor positive effect is also expected for SA objective 6.6 (provide access to training, skills development) as the policy seeks to retain local facilities which would include schools and other educational establishments and ensure they are well connected to services and facilities through the accessibility to public transport services.

Policy SADM 8: Cemetery Extension at Southway, Hatfield

- 6.87 The policy supports the allocation for an extension to the existing cemetery south of Southway, Hatfield. Development within the allocated cemetery site will need to take account of safe and satisfactory vehicular, pedestrian and cyclist access and routes, maintaining the openness of the site and surrounding areas of countryside and Green Belt and protection of groundwater.

SA findings

- 6.88 This location of this site is likely to have significant positive effects on SA objective 4.2 (reduce greenhouse gas emissions from transport), and SA objective 4.3 (air pollution) as it is in close proximity to either bus stops or a rail station which could therefore encourage the use of public transport reducing greenhouse gas emissions and air pollution. The policy also requires that safe and satisfactory vehicular, pedestrian and cyclist access and routes are provided.
- 6.89 The site is likely to have an uncertain minor positive effect on objective 4.6 (biodiversity) due to the distance of the site from designated sites and the potential for biodiversity enhancements associated with cemetery development.
- 6.90 A mixed uncertain effect is considered for the cemetery site option for SA objective 4.4 in relation to landscape character as it depends on the extent of design and landscaping. A minor positive effect is likely on open space due to the creation of new public open space, with negligible and uncertain effects on previously developed land and local distinctiveness respectively. The policy offers mitigation by requiring developments to take account of "*maintaining the openness of the site and surrounding areas of countryside and Green Belt*".
- 6.91 A minor negative impact is likely the sites with regards to SA objective 4.10 (conservation and sustainable use of land) as the cemetery sites both contain grade 2 and 3 agricultural land.
- 6.92 All other scores identified were either negligible or non-applicable to the assessment of this site.

Summary of SA scores

- 6.93 The SA scores for the Proposed Submission Local Plan section on Culture, Services and Facilities are shown in **Table 6.3**.

Table 6.3: Summary SA scores for Culture, Services and Facilities

SA Question: Will the policy...	SP5	SADM 4	SADM 5	SADM 6	SP6	SADM 7	SADM 8
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	0	0	0	0	+	++	N/A
...lead to improved health for all? (1.2)	0	0	0	0	++	++	N/A
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	+	+	0	0	+	+	N/A
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0	0	0	0	0	0
...encourage involvement of the public in the planning process? (3.1)	0	0	0	0	+	0	N/A
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0	0	0	0	0	N/A
...significantly reduce greenhouse gas emissions from transport? (4.2)	+/-?	+/-?	+	0	+	+	++
...avoid and reduce air pollution? (4.3)	+/-?	+/-?	+	0	+	+	++
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+/-?	+	+	+	0	0	+
							+/-?
							0
							?
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	+/-?	+	+	+	+	0	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	0	0	0	0	0	0	+?
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0	0	0	0	N/A

SA Question: Will the policy...	SP5	SADM 4	SADM 5	SADM 6	SP6	SADM 7	SADM 8
...avoid water pollution? (4.8)	0	0	0	0	0	0	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0	0	0	0	0	N/A
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	+/-?	+	+	0	0	+	-
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	0	0	0	0	0	0	N/A
...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)	+	++	+	0	0	0	N/A
...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)	+	+	+	+	0	+	N/A
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	++	++	+	+	0	0	N/A
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	++	++	++	0	+	0	N/A
...avoid the sterilisation of mineral resources? (6.5)	+/-?	0	0	0	0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	0	0	0	0	+	+	N/A

Type and mix of housing

Alternatives considered

6.94 Issues and Options alternatives SC17-SC35 relate to the development of policies in this section of the Proposed Submission Local Plan.

- Option SC17: Reduce our current thresholds, i.e. the point at which we seek a proportion of affordable housing to be provided on sites, across all the Borough's urban areas from 25 new dwellings to 15 new dwellings, which would be in line with the national indicative rate as set out in Planning Policy Statement 3;.
- Option SC18: Introduce thresholds, which could vary from settlement to settlement, below the national indicative rate of 15 new dwellings, especially where this would help to meet housing needs and extend housing choice in our large and small villages?
- Option SC19: SC19. Seek a financial contribution from small sites, towards the provision of affordable housing off-site, in lieu of on-site provision of affordable housing, so that all residential development generally makes a contribution towards meeting an overall target?
- Option SC20: SC20. Not expect small sites below an agreed threshold, i.e. below a certain number of dwellings, to contribute towards the provision of affordable housing at all?
- Option SC21: Make provision to release sites solely for affordable housing in or around our large and small villages where this would meet an identified local need and extend housing choice?
- Option SC22: Make provision to release sites for a mix of both market and affordable housing around our large and small villages where this would meet an identified local need and extend housing choice?
- Option SC23: Require the provision of extra care housing and other supported housing as part of the overall requirement for affordable housing?
- Option SC24: Require the provision of extra care housing and other supported housing in addition to the overall requirement for affordable housing?
- Option SC25: Make no special policy requirement for extra care housing and other supported housing to be provided?
- Option SC26: Require all new homes to be built to the lifetime homes standard until such time as it becomes a regulatory requirement for all types of housing?
- Option SC27: Only require a percentage of new homes to be built to lifetime homes standards?
- Option SC28: Limited alterations to the green belt boundary where no green belt alternatives are available.
- Option SC29: A 'rural exception site policy' to allow for the allocation and release of small sites to meet local need.
- Option SC30: Provision for new Gypsy and Traveller sites within areas identified for urban expansion.
- Option SC31: Because of the need for Travelling Showpeople to store and maintain large vehicles and show equipment, provision for new sites could be made in areas that may be identified as being surplus to employment use.
- Option SC32: Provision for additional plots could be made as an extension to the existing site in the Borough.
- Option SC33: Limited alterations could be made to the green belt boundary where no green belt alternatives are available.

- Option SC34: A 'rural exception site policy' to allow for the allocation and release of small sites.
- Option SC35: Provision could be made for new sites within areas identified for urban expansion.

6.95 At the Emerging Core Strategy stage, draft policy CS 7: Type and Mix of Housing was subject to SA.

Policy SP 7: Type and Mix of Housing

6.96 Policy SP 7 sets out that all proposals for 11 or more dwellings will need to demonstrate how the mix of tenure, type and size of housing proposed meets the Council's evidence of housing need. The policy gives specific requirements and guidance relating to affordable housing, rural exceptions sites, self-build and custom houses, housing for older people, specialist housing, accessible and adaptable dwellings, meeting the need for pitches for the Gypsy and Traveller community, houses in multiple occupation, and purpose built student accommodation.

SA findings

- 6.97 This policy is very specific, and as such a large number of the SA objectives are not expected to be affected. Of those that are, mostly positive effects have been identified. In particular, a significant positive effect on objective 5.1, as the primary purpose of the policy is to ensure that the right amount, type and tenure of housing is provided to meet local housing need. The affordable housing targets should help to ensure that developments include a reasonable proportion of housing that is affordable to younger people and those on lower incomes. A minor positive effect on SA objective 5.1 (reducing health inequalities) is also likely as the policy requires all developments of over five homes to ensure that at least 20% of new homes meet standards for 'accessible and adaptable dwellings'. The policy also sets a target for 5% of all new housing delivered at Strategic Development Sites to make provision for housing which is specially designed for older people.
- 6.98 A mixed effect has been identified in relation to SA objective 6.4 (sustain rural communities and their economies) because, although the policy will help to retain the viability and vitality of the Borough's rural communities by allowing for small-scale affordable housing development on Rural Exceptions Sites where there is particular local need, thereby enabling younger people and those on lower incomes to remain in these areas where house prices are high, this also poses a risk to rural character as development could therefore occur where it would not normally be permitted, including within the Green Belt. However, it is recognised that other Proposed Submission Local Plan policies such as those relating to the quality of new development (SP 9) and the protection of critical assets (SP 11) would apply to housing development coming forward at rural exceptions sites, and so should protect the landscape and local (rural) character, thereby providing mitigation for the potential negative effect.

Policy SADM 9: Loss of Residential

6.99 This policy states that proposals which would result in the loss of one or more dwellings will only be permitted provided certain criteria are met. The policy seeks to protect residential housing supply. A shortfall of housing could occur if there are losses to the existing housing stock. The policy will help make the best use of existing resources and minimise the pressure for further development by effectively managing the stock of housing in the Borough.

SA findings

6.100 The policy is likely to have a significant positive effect for SA objective 5 (housing) as the policy seeks to resist the loss of residential development. The policy is expected to have negligible effects on all other objectives.

Summary of SA scores

6.101 The SA scores for the Proposed Submission Local Plan section on Type and Mix of Housing are shown in **Table 6.4**.

Table 6.4: Summary SA scores for Type and Mix of Housing

SA Question: Will the policy...	SP7	SADM 9
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	+	0
...lead to improved health for all? (1.2)	0	0
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	0	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0
...encourage involvement of the public in the planning process? (3.1)	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	0	0
...avoid and reduce air pollution? (4.3)	0	0
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	0	0
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	0	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	0	0
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0
...avoid water pollution? (4.8)	0	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	0	0
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	++	++
...ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy? (6.1)	0	0
...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)	0	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	0	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	+/-?	0
...avoid the sterilisation of mineral resources? (6.5)	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	0	0

Economy

6.102 Issues and Options alternatives PG1-PG12 relate to the development of policies in this section of the Proposed Submission Local Plan.

- Option PG1: Choose to keep roughly the same number of jobs in the Borough as we have now to create a match between jobs and housing?.
- Option PG2: Allow the number of jobs in the Borough to rise to reflect the number of new homes to be built?
- Option PG3: Provide jobs for people in neighbouring areas as a way of promoting the Hatfield and Welwyn Garden City as a Key Centre for Development and Change?
- Option PG4: PG4. Locating new employment provision where it has the best chance of fitting with the Borough's role as a key economic driver in the East of England. Should we do this by:
(a) Focusing on expansion in knowledge-based industries, perhaps by encouraging further development of such industries close to the University of Hertfordshire's existing facilities for innovation in knowledge based industries (one option for this could be west of Hatfield, potentially in St Albans district).

OR

(b) Focusing on strategic distribution warehousing on new sites for employment use.

- Option PG5: Ensuring that there is a range of types of job in the Borough to meet the needs of local people in close proximity to where they already live. For example, by making provision for smaller businesses to help maintain a mix of types of employment offer and to ensure that larger businesses can be serviced locally? This would imply continuing the existing approach of encouraging the recycling of sites in existing employment areas for new employment and also providing new employment opportunities as part of new neighbourhoods located in urban extensions. Part of this strategy would involve aligning the number of jobs in the Borough with the number of economically-active residents.
- Option PG6: Focusing our efforts on regenerating employment provision in declining areas to address the needs of people living in deprived areas. Part of this approach could involve encouraging the provision of training facilities within existing employment areas to enable on-the-job training to take place.
- Option PG7: Protecting employment provision in villages and other rural parts of the Borough to provide job opportunities for people living in those areas.
- Option PG8: A mixture of strands a, b, c and d above.
- Option PG9: The remodelling of existing employment areas to enable them to compete better with other business areas by allowing in other types of activity such as small-scale shops (of less than 280 square metres relevant floorspace), cafes, health and fitness and childcare? This would be consistent with the strategy of ensuring that there is a range of types of job in the Borough to meet the needs of local people in close proximity to where they already live.
- Option PG10: Retain existing employment sites to accommodate our own job growth needs This would be consistent with either strand (b) or strand (c) above.
- Option PG11: The redevelopment of sites which currently cause environmental nuisance, the redevelopment of sites that are of poor quality with high vacancy rates and the redevelopment of sites that are currently difficult for goods vehicles to access?
- Option PG12: The redevelopment of sites on the edge of employment areas that can easily be integrated into neighbouring communities?

6.103 At the Emerging Core Strategy, SA was undertaken of draft Policy CS 8: Economy.

Policy SP 8: Local Economy

6.104 Policy SP 8 supports economic prosperity and encourages inward investment and the creation of a range of jobs by resisting the loss of land from Class B uses, retaining a stock of good quality employment land and premises, ensuring provision is made to meet the needs of existing

business sectors and those looking to invest, maintaining a balance of types of employment, ensuring that a range of provision is made in terms of sites and premises, and by recognising the important role played by non-Class B uses in providing employment and contributing to the local economy.

- 6.105 The policy goes on to provide specific guidance to a range of relevant factors such as designated employment areas, high value employment uses, small and medium sized businesses, business diversification in rural areas, childcare facilities, and facilities for training and upskilling of the workforce.

SA findings

- 6.106 The likely effect of Policy SP 8 on the SA objectives is mixed. Significant positive effects and other broadly positive effects are likely in relation to long-term SA objective 6 (a thriving economy) as the purpose of the policy is to encourage inward investment and better training and education opportunities by providing employment sites within the Borough to accommodate a range of business types and sizes. It should be noted, however, that the Proposed Submission Local Plan is planning for about 22,000 sqm short of the 138,000 sqm of employment floorspace recommended in the Economy Study Update, which means that SA objective 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) receives a mixed (significant positive/minor negative) score. Despite this, the Council anticipates that the number of total jobs growth recommended in the Economy Study Update will be met.
- 6.107 Potential minor negative effects on a number of the sub-objectives relating to long-term SA objective 4 (improving the environment) have been identified, as the economic development encouraged by the policy is likely to lead to overall increases in emissions from built development and transport, increased water consumption and potentially increases in air pollution from traffic within the Borough. However, it is recognised that all development coming forward under the policy will be subject to other Local Plan policies such as those relating to design quality (policy SP 9) and the protection of critical assets (policy SP 11), which should provide some mitigation for these potential negative impacts.
- 6.108 Various uncertainties exist with regards to the potential impacts of the development that is likely to come forward under this policy, as they will depend largely on the exact location of development and the nature of the businesses which are encouraged to invest in the Borough.

Policy SADM 10: Employment Development

- 6.109 This policy lists areas of land that are designated as employment areas for Class B and associated land uses. The policy will help prevent the likely continued loss of employment land through permitted development rights for converting offices to houses.
- 6.110 Most of the sites listed in the policy are existing employment areas. New employment areas for Class B uses are designated through the Proposed Submission Local Plan being EA10 London Road, Woolmer Green, and EA11 Cole Green Lane, Welwyn Garden City. These are existing employment sites rather than proposed allocations and so have not been subject to further SA.
- 6.111 In addition, land is also being allocated for Class B1 use as part of a mixed-use development at Marshmoor.

SA findings

- 6.112 The land being allocated for Class B1 use as part of a mixed-use development at Marshmoor (this is appraised under **Policy SP 23: Marshmoor Policy Area (SDS7 and Wider Area)**). The provision of employment land at Broadwater Road West is covered in the appraisal of **Policy SP 17: Mixed Use Development Site at Broadwater Road West (SDS3 and SDS4)**.
- 6.113 For those sites that are already operating as employment areas, a significant positive effect is expected for ensuring the supply, location and quality of business and employment sites (SA objective 6.1), with negligible effects on all other SA objectives beyond those already occurring. The approach in the Proposed Submission Local Plan is to protect all of its designated employment land as far as possible, including land within designated employment areas that has yet to be developed.

Summary of SA scores

6.114 The SA scores for the Proposed Submission Local Plan section Economy are shown in **Table 6.5**.

Table 6.5: Summary SA score for Economy

SA Question: Will the policy...	SP8	SADM 10
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	+?	0
...lead to improved health for all? (1.2)	0	0
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	+?	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0
...encourage involvement of the public in the planning process? (3.1)	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	-?	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	-?	0
...avoid and reduce air pollution? (4.3)	-?	0
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+/-?	0
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	+/-?	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	?	0
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	-?	0
...avoid water pollution? (4.8)	-?	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	+/-?	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	+/-?	0
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	0	0
...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)	++/-	++
...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)	++	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	+	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	+	0
...avoid the sterilisation of mineral resources? (6.5)	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	++	0

Quality of new development

Alternatives considered

- 6.115 Issues and Options alternatives E8-E17, SC6-SC8, SC10-SC11, SC15, PG25-PG26, PG29-PG30 relate to the development of policies in this section of the Proposed Submission Local Plan.
- Option E8: Setting ambitious local targets which exceed the minimum regional targets for the percentage of energy delivered from decentralised and renewable or low-carbon energy sources, and / or setting lower thresholds than those set out in RSS policy ENG1?
 - Option E9: Seek to reflect the minimum regional targets, so that where practical and viable, new development of more than 10 dwellings and 1000m² of non-residential floorspace should secure at least 10% of their energy from decentralised and renewable or low-carbon energy sources, either on-site or in the locality.
 - Option E10: Seek to achieve greater harmonisation between private sector new build housing and affordable housing built with grant funding, so that, regardless of tenure, housing is built to the same Code for Sustainable Homes levels at the same time?
 - Option E11: Should private housing only be required to comply with the Code for Sustainable Homes when the building regulations require it to do so?
 - Option E12: Require new non-residential development to meet any other standard, such as the BREEAM standards?
 - Option E13: Should new non-residential development not be required to meet any other standards apart from the Building Regulations?
 - Option E14: Promote sustainable design and building practice through the provision of local guidance on energy efficiency measures, renewable and low carbon energy technologies for new and existing development?
 - Option E15: Should we rely on national and or regional sustainable design guidance as it becomes available, rather than produce our own local guidance?
 - Option E16: Require water efficiency measures to be integrated into new housing development to help achieve a usage target of 105 litres/head/day, i.e. Level 3 and 4 of the Code for Sustainable Homes.
 - Option E17: Require water efficiency measures to be integrated into new housing development to help achieve a usage target of 80 litres/head/day, i.e. Level 5 and 6 of the Code for Sustainable Homes.
 - Option SC6: Be guided by a reflection of the character and identity of the settlement that it adjoins.
 - Option SC7: Embody the key design principles of the original 'Garden City', in terms of layout, landscaping and architectural styles, regardless of its location.
 - Option SC8: Seize the opportunity to create a defining and ambitious new sense of character and identity based on 21st Century sustainable design principles that will endure for future generations.
 - Option SC10: As a general principle in developing these standards will it be appropriate to reduce the size threshold for teenage provision so that a more comprehensive network of provision can be made.
 - Option SC11: Should the FIT space standards set out in Table 4 above be a guiding principle so that provision for teenagers is only made in the larger areas of open space.
 - Option SC15: Do you consider we should use the recommended standards for allotments, amenity green spaces, natural green spaces and parks or gardens identified in table 6 as a guide for setting our standards of future provision?
 - Option PG 25: Should we continue with our existing approach of requiring developments to be built at densities of 30 to 50 dwellings per hectare (dph), but allow densities of more than 50

dph in locations such as town centres where there is good accessibility by modes of transport other than the car?

- Option PG26: Should we plan for higher densities than those currently applied in the Borough?
- Option PG29: Do you consider that preventing the coalescence of our towns and smaller settlements, in order to maintain their distinct character and identity, should be a priority?
- Option PG 30: Do you consider that the coalescence of towns and smaller settlements need not be a barrier to housing growth and should be planned for?

6.116 At the Emerging Core Strategy stage (2012), the following draft policies were subject to SA:

- Policy CS 9: Good Quality Design.
- CS 10: Sustainable Design and Construction.

Policy SP9: Place Making and High Quality Design

6.117 Policy SP 9 sets out the principles that the Council will apply when considering development proposals. The principles require developments proposals to respond to the character and context of the location where the development is proposed, be legible, permeable and well connected, incorporate high quality public space and landscaping, allow space for nature, offer vibrancy and diversity, be safe and secure, and be of appropriate built function and form. Specific guidance is given to proposals for taller buildings.

SA findings

6.118 The likely effects of Policy SP 9 on the SA objectives are broadly very positive, as this policy outlines criteria which will apply to all new development coming forward within the Borough and which aims to directly address a number of the potential negative impacts of development on the SA objectives such as local character, space for nature, security and accessibility. As such, the policy should provide mitigation in relation to the potential negative effects of other Local Plan policies.

6.119 In particular, significant positive effects have been identified in relation to SA objective 4.5 (protect and enhance the character of the Borough). The high quality design standards required by Policy SP 9 should have significant positive effects in terms of ensuring that new development enhances local character, as it requires developments to reflect local character and incorporate high quality landscaping.

Policy SADM 11: Amenity and Layout

6.120 This policy requires all proposals to create and protect a good standard of amenity for buildings and external open space in line with the Council's Supplementary Design Guidance.

SA findings

6.121 A minor positive effect is expected for decent housing (SA objective 5.1) as the policy relates to the incorporation of good design into all development proposals in the Borough, including housing.

6.122 The policy requires that new development must not be overbearing upon existing buildings or open spaces. This will help protect local character and open space resulting in a minor positive on SA objective 4.4 (landscape character). The amenity requirements of this policy such as natural lighting, ventilation, and a reasonable degree of private spaces etc. is likely to have benefits for health resulting in a minor positive effect for SA objective 1.1 and SA objective 1.2.

Policy SADM 12: Parking, servicing and refuse

6.123 This policy sets out more detailed criteria in relation to parking, and servicing and refuse that will support the delivery of a high quality built environment.

SA findings

6.124 A minor positive effect is expected for SA objective 4.9 (minimising waste generation) as the policy seeks to encourage appropriate provision of service areas, access routes and refuse storage and collection areas.

6.125 Whilst the provision of car parking at new developments may encourage people to drive resulting in increased greenhouse gas emissions, the policy also requires that new developments should

make provision for parking for more sustainable forms of transport, including cycling which may encourage a reduction in car use, and thus a reduction in emissions with additional benefits for health as people engage in more active travel. Therefore a mixed effect is expected for SA objective 1.1 and SA objective 1.2 (health), SA objective 4.2 (reduce greenhouse gas emissions from transport), and SA objective 4.3 (air pollution).

Policy SP 10: Sustainable Design and Construction

- 6.126 Policy SP10 supports proposals that adopt sustainable design and construction principles within an integrated design solution, as demonstrated via a Sustainable Design Statement and associated plans. The principles relate to the use of materials and management of waste, water sensitive design, energy and climate change, and landscape and biodiversity.

SA findings

- 6.127 The likely effects of Policy SP 10 on the SA objectives are broadly very positive, as this policy outlines criteria which will apply to all new development coming forward within the Borough and which aims to directly address a number of the potential negative impacts of development on the SA objectives such as greenhouse gas emissions, adaptation to climate change and waste minimisation. As such, the policies should provide mitigation in relation to the potential negative effects of other Local Plan policies.
- 6.128 In particular, significant positive effects have been identified in relation to SA objectives 4.1 (reduce greenhouse gas emissions from built development), 4.6 (protect and enhance biodiversity, taking into account the impacts of climate change), 4.7 (reduce water consumption, and provide for reliable sources of water supply even in drought conditions), 4.8 (avoid water pollution), and 4.9 (minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced). The policy specifically aims to reduce carbon emissions from built development, promote ecological principles and biodiversity in the landscape design of development, encourage water sensitive design, and support the reuse and recycling of materials.

Policy SADM 13: Sustainability Requirements

- 6.129 This policy sets out clear targets for improving the environmental sustainability of new buildings, in terms of energy and water.

SA findings

- 6.130 A significant positive effect is expected for SA objectives 4.1 (reduce greenhouse gas emissions from built development) and 4.7 (reduce water consumption) as the policy directly relates to reducing greenhouse gas emissions from built development and reducing water consumption.
- 6.131 The policy may result in a minor positive result for housing (SA objective 5.1) as it may lead to dwellings being of a particularly high standard. A minor positive effect is also expected for health (SA objective 1.1) as the policy aims to achieve energy efficient housing stock, which would help to address fuel poverty.

Policy SADM 14: Flood Risk and Surface Water Management

- 6.132 This policy sets out the approach to evaluating and, where acceptable, managing flood risk to and arising from development proposals in a way which provides additional benefits to people and the natural environment.

SA findings

- 6.133 A significant positive effect is expected for flood risk (SA objective 2.2) as the policy directly relates to reducing, evaluating and managing flood risk. A minor positive effect is expected for health (SA objectives 1.1 and 1.2) as the risk of people's physical and mental health and wellbeing being affected by flooding should be reduced. The policy seeks to ensure that flood risk is managed which is likely to help avoid the potential negative effects of flooding to assets such as Listed Buildings resulting in a minor positive effect for heritage assets (SA objective 4.5). A reduced risk of flooding can also have benefits to the natural environment in terms of reduced habitat fragmentation/erosion etc. Therefore a minor positive effect is also expected for biodiversity (SA objective 4.6). A minor positive effect can also be expected for water pollution (SA objective 4.8) due to the requirement to use Sustainable Urban Drainage Systems. SuDS can

improve water quality by filtering out contaminants. A minor positive effect is expected for decent housing and for ensuring the supply, location and quality of business and employment sites (SA objective 5.1 and 6.1) as reduced flood risk would lead to an increase in the overall quality and safety of the housing and employment stock and would ensure development is appropriately located.

Summary of SA scores

- 6.134 The SA scores for the Proposed Submission Local Plan section Quality of New Development are shown in **Table 6.6**.

Table 6.6: Summary SA scores for Quality of New Development

SA Question: Will the policy...	SP9	SADM 11	SADM 12	SP10	SADM 13	SADM 14
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	+	+	+/-	+	0	+
...lead to improved health for all? (1.2)	0	+	+/-	0	0	+
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	+	0	0	0	0	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0	0	+	0	++
...encourage involvement of the public in the planning process? (3.1)	0	0	0	0	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	+	0	0	++	++	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	+	0	+/-	0	0	0
...avoid and reduce air pollution? (4.3)	+	0	+/-	+	0	0
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+	+	0	+	0	0
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	++	0	0	0	0	+
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	+	0	0	++	0	+
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0	++	++	0
...avoid water pollution? (4.8)	0	0	0	++	0	+
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0	+	++	0	0

SA Question: Will the policy...	SP9	SADM 11	SADM 12	SP10	SADM 13	SADM 14
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	0	0	0	+	0	0
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	0	+	0	0	+	+
...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)	+	0	0	+	0	+
...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)	+?	0	0	+?	0	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	+	0	0	+	0	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	+	0	0	+	0	0
...avoid the sterilisation of mineral resources? (6.5)	0	0	0	0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	0	0	0	0	0	0

Environmental assets

Alternatives considered

- 6.135 Issues and Options alternatives E1-E7 relate to the development of policies in this section of the Proposed Submission Local Plan.
- Option E1 Protection and enhancement of the natural landscape character of the Borough – the land use, fields, woodlands, trees and hedgerows, river valleys etc. i.e. what makes the area locally distinctive.
 - Option E2: Protection of historic assets, including historic buildings, parks and gardens, and their settings.
 - Option E3: Protection of the landscape setting of the Borough's towns and villages.
 - Option E4: Protection of publicly accessible open space.
 - Option E5: Protection of high quality agricultural land and soils.
 - Option E6 Protection of mineral deposits that may be needed for future use.
 - Option E7: Protection of habitats and areas of wildlife conservation importance at a local level, e.g. non statutory County wildlife sites.
- 6.136 At the Emerging Core Strategy stage (2012), draft Policy CS 11: Protection of Critical Assets was subject to SA. At the Local Plan Consultation Document stage (2015), a new draft policy intention CS 19; Strategic Green Infrastructure was subject to SA.

Policy SP 11: Protection and Enhancement of Critical Environmental Assets

- 6.137 Policy SP 11 sets out the approach in the Proposed Submission Local Plan to the protection of the environmental, ecological and historic assets of the Borough, including best and most versatile agricultural land, the water environment and flood plains, new areas of urban open land.

SA findings

- 6.138 The likely effects of Policy SP 11 are mainly positive or significantly positive, as this policy provides considerable mitigation for the potential impacts of other Local Plan policies, due to the criteria that it sets out for development to adhere to. Significant positive effects are likely in relation to reducing water consumption (SA objective 4.7) and avoiding water pollution (SA objective 4.8), as well as promoting the conservation of high quality agricultural land (SA objective 4.10) as these issues are directly addressed by the policy. Further minor positive effects are likely in relation to most of the other criteria considered under SA objective 4 (improving the environment).

Policy SP 12: Strategic Green Infrastructure

- 6.139 This policy has evolved from policy intention CS19 which in turn proposed to replace Emerging Core Strategy Policy CS19 (*Ellenbrook Fields Country Park and Safeguarded land*). It seeks to promote and secure a network of strategic Green Infrastructure through masterplanning of strategic sites and CIL/S106 contributions. The policy is for a network of strategic Green Infrastructure to provide connected open spaces, access to natural green space, enhance biodiversity and help to mitigate the impacts of development.

SA findings

- 6.140 The policy is considered to have a significant positive effect on SA objectives 1.1 and 1.2 as a network of green infrastructure linking communities and open spaces will have health benefits.
- 6.141 The policy is not expected to have an effect on SA objectives 2.1 (reduce opportunities for crime and anti-social behaviour, and reduce fear of crime), 3.1 (encourage involvement of the public in the planning process) and 5.1 (provide the right amount, type and tenure of housing to meet identified local needs).

- 6.142 It is considered that connected green and open spaces could help to reduce flood risk therefore a significant positive effect is likely for SA objective 2.2.
- 6.143 A significant positive effect is considered for SA objective 4.4 as the creation of a network of open spaces will have a significant effect on open space and landscape character and maintain local distinctiveness. The Green Corridor east to west across the Borough between Welwyn Garden City and Hatfield will be particularly important in this regard.
- 6.144 A significant positive effect is likely for SA objective 6.5 as land of strategic value for minerals will not be developed as a result of this policy, and minerals could be extracted at a later date if required.
- 6.145 The policy is likely to have a significant mixed effect on SA objective 4.6 (protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change) as a network of green open spaces will enhance biodiversity, however there it is possible that increased access to open spaces for recreation could negatively affect biodiversity.
- 6.146 A minor positive effect is likely for SA objective 4.2 as a network of green infrastructure linking communities could encourage walking and cycling and reduce greenhouse gas emissions from vehicle transport. The policy also scored a minor positive in relation to avoiding and reducing air pollution (SA objective 4.3) as it could encourage more sustainable modes of transport (walking and cycling).
- 6.147 In relation to SA objective 4.5 (conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings) an uncertain minor positive effect is predicted, as the effect on this objective depends on the location of development, however the policy does include specific reference to the delivery of a Green Corridor east to west across the Borough between Welwyn Garden City and Hatfield.
- 6.148 A network of GI including sustainable urban drainage systems and 'buffer zones' would have potential to reduce water pollution therefore a minor positive effect is likely in relation to avoiding water pollution (SA objective 4.8).
- 6.149 An uncertain minor positive effect is likely for SA objective 4.10 (sustainable use of agricultural and previously developed land) depending on whether the open space to be created or incorporated into the network is greenfield land or best and most versatile agricultural land.
- 6.150 The policy therefore scores positively for the majority of the objectives it is expected to have an effect on. There were no significant negative effects considered for the policy and significant positive score were obtained with regards to health benefits (1.1 and 1.2), flood risk (2.2), open space, landscape character and local distinctiveness (4.4) and avoidance of the sterilisation of mineral resources (6.5).

Policy SADM 15: Heritage

- 6.151 This policy will support the conservation and preservation of the Borough's heritage assets. It sets out the factors that should be considered for proposals that affect designated heritage assets and the wider historic environment, the use of Heritage Statements, Heritage Impacts Assessments and/or Archaeological Assessments, and the approach to making decisions on proposals where harm to the significance of heritage assets is likely to occur.

SA findings

- 6.152 Policy SADM 15 is unlikely to have a significant effect on the majority of the SA objectives. A significant positive effect has been identified in relation to protecting and enhancing the Borough's character, sense of place and local distinctiveness, historic and cultural assets (SA objective 4.5). This in turn is likely to make a positive contribution to local character and distinctiveness of the Borough resulting in a significant positive for landscape character (SA objective 4.4).
- 6.153 Although the policy could prevent some development coming forward that would otherwise harm heritage assets, it is unlikely that this will have a significant effect on the delivery of development needed in the Borough.

SADM 16: Ecology and Landscape

- 6.154 This policy requires proposals to protect and wherever possible enhance biodiversity the integrity of ecological network. It sets out the approach to the hierarchy of biodiversity designations, from

international, through national to local. Proposals are also required to help conserve and enhance the Borough's natural and historic landscape.

SA findings

- 6.155 A significant positive effect is expected for SA objective 4.4 (landscape character) and SA objective 4.6 (biodiversity) as the policy directly relates to protecting and enhancing the Borough's biodiversity and landscapes.
- 6.156 The policy will have further minor positive effect for health (SA objective 1.1 and SA objective 1.2) and crime and anti-social behaviour (SA objective 2.1) on account of the Borough's natural assets being utilised for a range of recreational activities, many of which may contribute to improving the physical and mental health of Borough's residents and social inclusion. The policy requires proposals to help conserve and enhance the Borough's natural and historic landscape and for proposals to sit comfortably within the wider landscape setting. This should help protect the historic environment and the local distinctiveness of the area resulting in a minor positive effect for heritage assets (SA objective 4.5).

Policy SADM 17: Urban Open Land

- 6.157 This policy sets out criteria for when proposals for development within Urban Open Land will be supported, and states that the same level of protection will be given to new areas of open space that meet the criteria for designation as Urban Open Land as designated Urban Open Land on the Policies Map.

SA findings

- 6.158 The likely effects of the policy on the SA Objectives are mainly minor positive with some negligible effects. No significant effects have been reported. The policy will have a minor positive effect for health (SA objectives 1.1 and 1.2) and crime and anti-social behaviour (SA objective 2.1) on account of the Borough's urban open land being utilised for a range of recreational activities, many of which may contribute to improving the physical and mental health of Welwyn Hatfield's residents and social inclusion. Minor positive effects are expected for flood risk (SA objective 2.2) as protecting and creating new open land is likely to contribute to improving the Borough's resilience to flooding. Retaining and creating urban open land is also likely to contribute to the appearance of developments and their setting within the wider landscape and to supporting biodiversity and habitat creation resulting in a minor positive effect for landscape character (SA objective 4.4) and biodiversity (SA objective 4.6).

Policy SADM 18: Environmental Pollution

- 6.159 This policy sets out an approach to ensure that pollution does not have an unacceptable impact on critical environmental assets, general amenity, human health, or quality of life. The policy refers to contaminated land and soil pollution, air quality, noise and vibration, and light pollution.

SA findings

- 6.160 The likely effects of the policy are mainly positive or significantly positive, as the policy provides considerable protection from the potential impacts of pollution. A significant positive effect is expected for health (SA objectives 1.1 and 1.2), and a significant positive effect is also expected for air pollution (SA objective 4.3) and conservation and sustainable use of land (SA objective 4.10) as the policy directly relates to the achievement of air quality standards and reducing risks associated with contaminated land, including soil pollution.
- 6.161 A minor positive effect is expected for reducing greenhouse gas emissions from transport (SA object 4.2) on account of the indirect ancillary beneficial effect of addressing air pollution. Biodiversity (SA objective 4.6) and water pollution (SA objective 4.8) are also expected to have minor positive effects as the policy seeks to protect critical environmental assets from pollution.

Summary of SA scores

- 6.162 The SA scores for the Proposed Submission Local Plan section on Environmental Assets are shown in **Table 6.7**.

Table 6.7: Summary SA scores for Environmental Assets

SA Question: Will the policy...	SP11	SP12	SADM 15	SADM 16	SADM 17	SADM 18
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	0	++	0	+	+	++
...lead to improved health for all? (1.2)	+	++	0	+	+	++
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	0	0	0	+	+	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	+	++	0	0	+	0
...encourage involvement of the public in the planning process? (3.1)	0	0	0	0	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0	0	0	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	+?	+	0	0	0	+
...avoid and reduce air pollution? (4.3)	+	+	0	0	0	++
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+	++	++	++	+	0
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	+	+?	++	+	0	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	+	++/-	0	++	+	+
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	++	0	0	0	0	0
...avoid water pollution? (4.8)	++	+	0	0	0	+
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0	0	0	0	0

SA Question: Will the policy...	SP11	SP12	SADM 15	SADM 16	SADM 17	SADM 18
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	+	+?	0	0	0	++
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	0	0	0	0	0	0
...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)	0	0	0	0	0	0
...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)	0	0	0	0	0	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	0	0	0	0	0	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	0	0	0	0	0	0
...avoid the sterilisation of mineral resources? (6.5)	0	++	0	0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	0	0	0	0	0	0

Infrastructure

Alternatives considered

- 6.163 Issues and Options alternatives SC10-SC14 relate to the development of policies in this section of the Proposed Submission Local Plan.
- Option SC10: As a general principle in developing these standards will it be appropriate to reduce the size threshold for teenage provision so that a more comprehensive network of provision can be made
 - Option SC11: Should the FIT space standards set out in Table 4 above be a guiding principle so that provision for teenagers is only made in the larger areas of open space
 - Option SC12: Use the recommended standards for outdoor sports facilities identified in table 5 as the basis for future provision?
 - Option SC13 Set a higher standard of 2.12 ha per 1000 people reflecting the current level of provision in the Borough
 - Option SC14 Can you suggest any alternative standards?
- 6.164 At the Emerging Core Strategy stage (2012), draft Policy CS 12: Infrastructure was subject to SA.

Policy SP 13: Infrastructure Delivery

- 6.165 Policy SP 13 seeks to ensure that the growth identified in the Proposed Submission Local Plan, and development proposals coming forward, are supported by new or improved infrastructure, as set out in the Council's Infrastructure Delivery Plan. The policy sets out the mechanisms that will be used to deliver the required infrastructure, such as Community Infrastructure Levy (CIL) and planning obligations.

SA findings

- 6.166 The likely effects of Policy SP 13 by itself are in many cases uncertain, although the type of infrastructure that is required to deliver the Local Plan is set out in the Council's Infrastructure Delivery Plan. A number of positive effects are likely - the provision of green infrastructure through this policy could have positive impacts on public health (SA objective 1.2) and on reduced greenhouse gas emissions from transport (SA objective 4.2) and air pollution (SA objective 4.3) as, if the provision of green infrastructure includes facilities such as walking and cycle routes (which the supporting text to the policy and the Infrastructure Delivery Plan both indicate will be the case), this will encourage healthier and more active lifestyles and could contribute to reduced car use. However, the opposite effect could result if highways infrastructure is provided (which the Infrastructure Delivery Plan also indicates will be necessary); therefore uncertain mixed effects have been identified in relation to SA objectives 4.2 and 4.3.
- 6.167 Further positive effects have been identified in relation to achieving safer communities (SA objective 2.1), due to the intention to incorporate a new policing facility into a new urban extension, and in relation to landscape character and local distinctiveness, as the green infrastructure to be provided (including through the Community Infrastructure Levy) will help to enhance local character.
- 6.168 A number of possible minor negative effects have been identified as the development of infrastructure across the Borough in general could potentially result in an increase in flood risk (SA objective 2.2) due to an increase in the extent of impermeable surfaces, waste generation (SA objective 4.9) and land take (SA objective 4.10). However, all of these potential effects are currently uncertain, without more detailed information about the type and location of infrastructure developments that are likely to come forward under the policy.

Policy SP 14: New Schools

- 6.169 Policy SP 14 ensures the proper provision for secondary education within the Borough. New development of this type should preferably be located within the existing urban area or the proposed strategic housing allocations to be sustainable and to avoid unnecessary additional impacts on the openness of the Green Belt.

6.170 The appraisal of the strategic development allocations and the school provision they incorporate are appraised separately. The primary purpose of this policy is to provide criteria for selecting a site for a third secondary school to serve Welwyn Garden City, should it be required.

SA findings

6.171 A significant positive effect is expected for SA objective 6.6 (provide access to training, skills development) as the policy will ensure sufficient school places are available for an increasing population.

6.172 It is likely that the provision of school places, would help to improve the health and wellbeing of the Borough's residents and promote social inclusion resulting in minor positive effects for SA objectives 1.1 and 1.2 (health) and SA objective 2.1 (crime and anti-social behaviour). The policy requires that the identification of the secondary site should follow a sequential approach with development preferably located within the existing urban area resulting in a minor positive effect for SA objective 4.10 (conservation and sustainable use of land). The policy wording should also ensure that unnecessary additional impacts on the openness of the Green Belt are avoided where possible, resulting in a minor positive effect for SA objective 4.4 (landscape character). However, as the exact locations are unknown the effect is uncertain. Locating new secondary schools close to the populations they are intended to serve would reduce the need to travel, which would reduce greenhouse gas emissions from transport and have benefits for air pollution. This would result in a minor positive effect for SA objective 4.2 (greenhouse gas emissions from transport) and 4.3 (air pollution). However, the effect is uncertain pending the exact location of the school provision.

Summary of SA scores

6.173 The SA scores for the Proposed Submission Local Plan section on Infrastructure are shown in **Table 6.8**.

Table 6.8: Summary SA scores for Infrastructure

SA Question: Will the policy...	SP13	SP14
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	0	+
...lead to improved health for all? (1.2)	+	+
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	+	+
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	-?	0
...encourage involvement of the public in the planning process? (3.1)	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	-?	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	+/-	+?
...avoid and reduce air pollution? (4.3)	+/-	+?
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+	+?
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	0	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	+/-?	0
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	+	0

SA Question: Will the policy...	SP13	SP14
...avoid water pollution? (4.8)	0	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	-?	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	-?	+
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	+	0
...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)	0	0
...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)	0	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	0	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	0	0
...avoid the sterilisation of mineral resources? (6.5)	-?	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	+	++

Welwyn Garden City

Alternatives considered

6.174 Issues and Options alternatives SC6-SC8, PG13-PG14, PG19-PG20, PG33-PG34 relate to the development of policies in this section of the Proposed Submission Local Plan.

- Option SC6: Be guided by a reflection of the character and identity of the settlement that it adjoins;
- Option SC7: Embody the key design principles of the original 'Garden City', in terms of layout, landscaping and architectural styles, regardless of it's location;
- Option SC8: Seize the opportunity to create a defining and ambitious new sense of character and identity based on 21st Century sustainable design principles that will endure for future generations.
- Option PG13: Do you agree with the council's proposed strategy of using an Area Action Plan to provide a master planning framework for Welwyn Garden City town centre to deliver improvements so that it can continue to fulfil its role as a major town centre?
- Option PG14: Do you think our strategy should be to identify the town centre as a strategic site allocation in the Core Strategy, setting out the broad uses and criteria that would be applied for its development rather than leaving the future detailed planning of the town centre to an Area Action Plan? ...
- Option PG19: The Council pursue a strategy of improving the evening economy of both Hatfield and Welwyn Garden City town centres?
- Option PG20: If yes, do you think we should have a strategy to identify specific areas of the town centres for the evening economy?
- Option PG33: Possible broad directions of growth - North east of Welwyn Garden City

- Option PG34: Possible broad directions of growth - South east of Welwyn Garden City

- 6.175 A range of growth locations for Welwyn Garden City were appraised by the SA at both the Emerging Core Strategy stage (2012), and the Local Plan Consultation Document stage (2015). These are reported upon in Chapter 5 of this SA Report.
- 6.176 In addition, at the Emerging Core Strategy stage (2012) draft Policy CS 13: The Historic Environment of Welwyn Garden City, and draft Policy CS 14 Welwyn Garden City Town Centre were subject to SA.
- 6.177 Further detailed consideration of the reasonable alternative site allocations for Welwyn Garden City appraised at the Proposed Submission stage is provided below.

Policy SP 15: The Historic Environment of Welwyn Garden City

- 6.178 Policy SP 15 recognises the 'Garden City' heritage and 'Mark One new Town' status of Welwyn Garden City. It requires development proposals to protect, conserve and where appropriate enhance these attributes, responding to the key characteristics of a Garden City.
- 6.179 To help achieve this, the policy sets out the requirements for larger developments. Developments of 100 to 499 dwellings will require the preparation of masterplans or development briefs, and developments of 500 dwellings or more will require a Supplementary Planning Document to be prepared by the Council.

SA findings

- 6.180 Policy SP 15 is unlikely to have a significant effect on the majority of the SA objectives. Significant positive effects have been identified in relation to protecting and enhancing the Borough's character, sense of place and local distinctiveness, historic and cultural assets (SA objective 4.5). The policy encourages new development to protect, conserve and where appropriate enhance Welwyn Garden City's heritage assets. The policy also sets out a number of requirements for development proposals to demonstrate how heritage assets have been considered in the design process in accordance with the Good Quality Design policy.
- 6.181 No significant negative or uncertain effects are predicted in relation to this policy.

Policy SP 16: Welwyn Garden City Town Centre Strategy

- 6.182 Policy SP 16 seeks to maintain and enhance the commercial, social and environmental success of the town centre.

SA findings

- 6.183 The likely effects of the policy on the SA objectives are mainly positive although some mixed effects were also identified.
- 6.184 Significant positive effects are likely in relation to enhancing the vitality and attraction of Welwyn Garden City retail centre (SA objective 6.3) as the policy primarily seeks to support development of the town centre as the Borough's primary comparison shopping retail destination and enhancement of the quality of the town centre environment. It also supports improved movement and access, giving priority to pedestrians, cyclists and public transport and seeks to provide opportunities for shopping, community and leisure events to encourage people to visit the town centre.
- 6.185 No significant negative or uncertain effects are identified in relation to this policy.

Policy SADM 19: Town Centre North Development Site (MUS1)

- 6.186 Policy SADM 19 relates to the allocation of an area of land at Town Centre North for major retail-led mixed-use development of around 6,000 sqm of comparison goods and 100 dwellings. The development is required to be in accordance with a Supplementary Planning Document (April 2015), but the policy sets down criteria to be taken into account for any development on the site.

SA findings

6.187 The SA findings of the development of this site are reported in the SEA³¹ of the Supplementary Planning Document and its accompanying Addendum³², and for the purposes of the Proposed Submission Local Plan, the SA findings are presented along with the SA findings of other site allocations under **Policy SADM 21: Housing Allocations in Welwyn Garden City**.

Policy SADM 20: Acceptable uses outside the Welwyn Garden City Core Retail Zone (The Campus, Parkway and Church Road)

6.188 This policy outlines acceptable uses outside the Welwyn Garden City Core Retail Zone (The Campus, Parkway and Church Road). The retention of and provision of new civic, cultural, community and leisure uses will be encouraged at The Campus. Where an existing use is no longer required the policy will allow a change of use or development for office, hotel, leisure, cultural, community, education and residential uses provided that the proposal meets certain criteria. On the western side of Parkway and the south side of Church Road, the policy allows for changes of use or development for office, community, cultural and residential uses provided that the proposal meets certain criteria. Proposals for new cultural or community facilities or to modernise or extend existing facilities will be supported along with the retention of such facilities.

SA findings

6.189 The likely effects from the policy are either minor positive or negligible. The policy will have a minor positive effect for health (SA objectives 1.1 and 1.2) and crime and anti-social behaviour (SA objective 2.1) on account of the policy supporting a range of local facilities, many of which may contribute to improving the physical and mental health of Borough's residents and social inclusion. The retention of such uses will also help retain local distinctiveness resulting in a minor positive for SA objective 4.4 (landscape character). A specific criterion of the policy is to preserve and enhance the character of the Conservation Area resulting in a minor positive effect for SA objective 4.5 (heritage assets). Where an existing use is no longer required the policy will allow proposals for certain changes of use or development in each area. The reuse of units in general should have would have a minor positive effect for SA objective 4.10 (conservation and sustainable use of land), while the reuse of units for residential purposes would have a minor positive effect for SA objective 5.1 (housing). Benefits for the economy are expected due to the policy helping to maintain the role and functionality of this area. Therefore minor positive effects are likely for the following economy related objectives: SA objectives 6.1 (ensure the supply, location and quality of business and employment sites), 6.2 (encourage economic investment in those areas most in need of regeneration) and 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres).

Summary of SA scores

6.190 The SA scores for the Proposed Submission Local Plan non-site allocation policies for Welwyn Garden City are shown in **Table 6.9**.

Table 6.9: Summary SA scores for non-site allocation policies for Welwyn Garden City

SA Question: Will the policy...	SP15	SP16	SADM20
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	0	+	+
...lead to improved health for all? (1.2)	0	+	+
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	0	+/-?	+

³¹ Welwyn Hatfield Borough Council (December 2013) Welwyn Garden City Town Centre North Draft Supplementary Planning Document Strategic Environmental Assessment Report

³² Welwyn Hatfield Borough Council (February 2015) Welwyn Garden City Town Centre North Supplementary Planning Document Addendum to the Strategic Environmental Assessment Report December 2013




SA Question: Will the policy...	SP15	SP16	SADM20
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0	0
...encourage involvement of the public in the planning process? (3.1)	0	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	0	+/-	0
...avoid and reduce air pollution? (4.3)	0	+/-	0
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+	+	+
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	++	+	+
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	0	+	0
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0
...avoid water pollution? (4.8)	0	0	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	+?	0	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	+?	0	+
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	0	+	+
...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)	0	+	+
...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)	0	+	+
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	+	++	+
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	0	0	0
...avoid the sterilisation of mineral resources? (6.5)	0	+	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	0	+	0

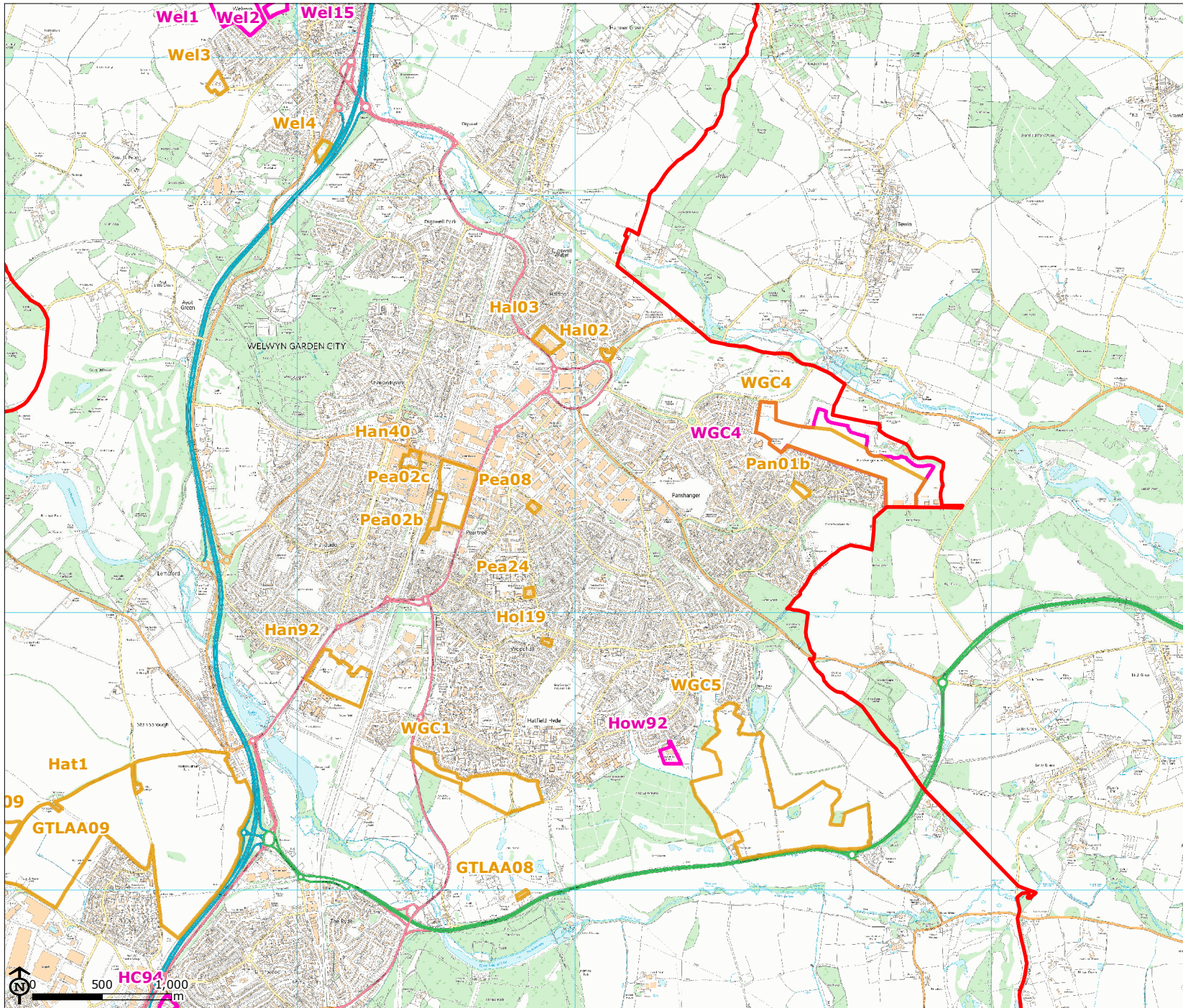
Policy SADM 21: Housing Allocations in Welwyn Garden City

6.191 At the Proposed Submission Local Plan stage, a total of fourteen sites including reasonable alternatives were considered for residential development in Welwyn Garden City (see **Figure 6.1**). Four were chosen for strategic allocation, and nine for other allocated key sites. These form **Policy SADM 21**, and are summarised in **Table 6.10** below. Combined, these will contribute to the delivery of 3,740 new homes in the Borough.

Figure 6.1

**Allocated and Reasonable
Alternative Sites in and
around Welwyn Garden
City**

-  Welwyn Hatfield Borough
-  Allocated Site
-  Reasonable Alternative Site



Source: Ordnance Survey, WHBC

Map Scale @ A4: 1:39,200



Table 6.10: Site allocations in Welwyn Garden City

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
SDS1	WGC4/7	North East of Welwyn Garden City	650	N/A
SDS2	WGC5	South East of Welwyn Garden City	1,200	N/A
SDS3	Pea02b	Broadwater Road West SPD Site (North)	850	6,370 sqm
SDS4	Pea02c	Broadwater Road West SPD Site (West)	171	11,500 sqm
MUS1	Han40	Welwyn Garden City Town Centre North SPD site	100	5,000 sq m retail
HS1	Pan01b	Land between Bericot Way and Waterbeach	28	N/A
HS2	WGC1	Creswick	290	N/A
HS3	Pea08	80 Bridge Road East	32	N/A
HS4	HaI03	Ratcliff Tail Life Site, Bessemer Road	110	N/A
HS5	Hol19	Hyde Valley House, Hyde Valley	17	N/A
HS6	Han91	Land at Gosling Sports Park	250	N/A
HS7	HaI02	Land at Waterside	20	N/A
HS8	Pea24	St Michaels House, Holwell Road	22	N/A

6.192 See **Table 6.12** for a summary of the appraisal scores.

6.193 The summary of the assessment of these sites begins with a summary of the findings of the SA of the strategic allocations, followed by the SA findings for the other allocated sites in Welwyn Garden City.

Policy SP 17: Mixed Use Development Site at Broadwater Road West – Strategic Allocations SDS3 (Pea02b) and SDS4 (Pea02c)

6.194 Land at Broadwater Road West is allocated for residential led mixed-use development. This brings together two sites – SDS3 Broadwater Road West SPD site (North), and SDS4 Broadwater Road West SPD site (West). The combined development will accommodate approximately 1,020 new homes, and 17,650 sqm employment. **Policy SADM 21** and **SP 17** provide guidance for development at the site. Development on this site will also need to comply with the **Broadwater Road West Supplementary Planning Document**, December 2008.

SA findings - social objectives (1.1, 1.2, 5.1)

6.195 This site is considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as they are all in reasonable walking distance of a range of services such as GP surgeries, convenience stores, post offices, hospitals, open space etc. Although these sites score positively, Policy SP 17 supports measures that enable the community to be active and healthy by ensuring the site includes community uses, fitness / leisure facilities. Furthermore, Policy SADM 21 states that site specific considerations include noise levels from the adjacent railways and commercial industries and the remediation of potentially contaminated land.

6.196 The two sites taken together are considered to have a significant positive effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people). Although **SDS3 (Pea02b)** meets this SA objective on its own, **SDS4 (Pea02c)** does not and is only

considered to have a minor positive effect. To reinforce the positive effects of housing delivered on this site, Policy SP 17 and SP 7 require the site to meet the delivery of 30% affordable housing and ensure that there is a wide mix of housing types, sizes and tenures including housing for older people.

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

- 6.197 This site is considered to have a significant positive effect on SA objective 4.2 (Reduce greenhouse gas emissions from transport) and SA objective 4.3 (Avoid and reduce air pollution) due to its proximity to public transport (bus stops and train stations), employment and services. To reinforce these effects, Policy SP 17 supports applications which establishes strong connections between the east side of town, the site and through to the town centre. Both sites are located on previously developed land and are therefore considered to have a significant positive effect on this element of SA objective 4.4 (Protect and enhance open space and landscape character) and in turn a minor positive effect on SA objective 4.10 (Conservation and sustainable use of land) by maximising the sustainable use of previously developed land. Both Broadwater sites are identified as having a negligible effect on open space and uncertain on landscape character site as they were not assessed as part of the Landscape Sensitivity and Capacity Study 2012. Policy SP 17 requires proposals to use the industrial heritage as a cue for form, character and identity. Further requirements relating to urban design principles are set out in the Broadwater Road West SPD, which could address and mitigate against the uncertainty.
- 6.198 In relation to the conservation of the historic environment (SA objective 4.5), a mixed significant positive and significant negative effect was identified. Both sites include the re-use of nearby Listed Buildings (Nabisco Shredded Wheat Factory and buildings 1 to 4 office block to Roche Products Factory) and redevelopment of other buildings. Furthermore, the SPD supports proposals which incorporate the '*Listed Buildings as landmarks in the overall structure of development*'. Therefore, while not at risk, the development of this site could help secure the future of the Listed Buildings through re-use and considerate design that is sensitive to its setting, which could result in a significant positive effect. This site is also within 250m of Welwyn Garden City Conservation Area, and was therefore considered to have a potentially significant adverse effect on the Conservation Area. However, as noted above, Policy SP 17 requires proposals to use the industrial heritage as a cue for form, character and identity and there is further guidance provided in the SPD, which will provide mitigation against the negative impacts and help deliver the predicted positive effects. Given that the site will deliver over 500 dwellings, Policy SP 15 The Historic Environment of Welwyn Garden City requires the Supplementary Planning Document to "*take[s] account of the unique heritage of the town and sets out a design framework and detailed guidance within which sites should come forward for development*".
- 6.199 Twentieth Mile Bridge Allotments Local Wildlife Site is located within 250m of both component sites that make up Policy SP 17. Requirements in Policy SP 17 to incorporate open space on the site will help to mitigate the effects of the development, supported by requirements set out in the SPD. Mitigation is also provided by Policy SADM 16, which provides further safeguards regarding biodiversity.
- 6.200 A negligible effect on flood risk (SA objective 2.2) as it is not located in the Environment Agency's flood zone 1 (lowest risk) or only a very small proportion of the site is in flood zones 2 or 3. A negligible effect is also identified in relation to water pollution (SA objective 4.8). Policy SADM 21 and Policy SP 17 requires development to include upgraded wastewater infrastructure and take into account noise from the railway and adjacent commercial activities as well as the potential for contaminated land.

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

- 6.201 Both sites are within an existing employment area and would result in some loss of employment land; therefore, a minor negative effect was identified. However, as this site is identified for mixed use including 6,400 sqm of employment floorspace, both sites were also considered to have a significant positive effect on the supply and location of employment land (SA objective 6.1). On the enhancement, vitality and attraction of Welwyn Garden City centre (SA objective 6.3), both sites were also considered to have a significant positive effect. A significant but uncertain positive effect was also identified in relation to access to education (SA objective 6.6) as the site is in reasonable walking distance of an educational establishment which has been assumed to have existing or future capacity to accommodate more students. The employment

uses on the site could provide opportunities for training and skills development but this is uncertain. However, this uncertainty is addressed in Policy SP 17, which require proposals to contribute towards school provision off-site in the immediate vicinity.

- 6.202 Both sites are also within reasonable walking distance of an area within the 20-40% most deprived areas within the Borough, which could encourage economic investment in those areas most in need of regeneration (SA objective 6.2) and therefore both sites were considered to have a minor positive effect.
- 6.203 In relation to the protection of mineral resources (SA objective 6.5), this site is considered to have a negligible effect.
- 6.204 All other scores identified were either negligible or not applicable.

Policy SP18: North East of Welwyn Garden City – Strategic Allocation SDS1 (WGC4)

- 6.205 SDS1 (WGC4) is a strategic site allocated for residential led mixed use development which will provide approximately 650 homes, sufficient land for six Gypsy and Traveller pitches, plus a range of community facilities including a small convenience shop and community hall to augment the existing neighbourhood centre at Moors Walk, a 2 form entry primary school, sustainable transport measures and formal and informal open spaces for leisure and recreation. **Policy SP 18** supports the development of the site.

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.206 This site is considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as it is within reasonable walking distance of a range of services such as GP surgeries, convenience stores, post offices, hospitals, open space etc. Although this site scores positively, Policy SP 18 supports measures that enable the community to be active and healthy by ensuring the site includes suitable pedestrian and cycle paths, formal and informal open spaces for leisure and recreation, including play areas, sports fields, allotments and community orchards.
- 6.207 This site is also considered to have a significant positive effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people). This site will deliver over 5% of the Borough's target for new housing, which should result in a significant positive effect in terms of its contribution to meeting the Borough's housing target. To take full advantage of the benefits of housing delivered on the site, Policy SP 18 and SP 7 require this site to provide at least 30% affordable housing (subject to robust viability tests) and ensure that there is a wide mix of housing types, sizes and tenures including housing for older people. It also provides for six Gypsy and Traveller pitches.

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

- 6.208 This site is considered to have a significant positive effect on SA objective 4.2 (Reduce greenhouse gas emissions from transport) and SA objective 4.3 (Avoid and reduce air pollution) due to its proximity to bus stops, employment areas and services. To reinforce these effects, Policy SP 18 requires applications to incorporate sustainable transport measures including the improvement of pedestrian links, cycle paths, passenger transport and community transport initiatives. The policy also requires proposals to bring forward wider strategic and local highway mitigation measures.
- 6.209 This site is located on the former Panshanger Aerodrome, which is be considered by the Council to be previously developed land, and was therefore considered to have a significant positive effect on SA objective 4.4 (Protect and enhance open space and landscape character) and in turn a minor positive effect on SA objective 4.10 (Conservation and sustainable use of land) by maximising the sustainable use of previously developed land. Although considered in planning terms to be previously developed land, the site has an open character, and therefore was considered to have a significant (uncertain) negative effect on open space (also SA objective 4.4). Panshanger Aerodrome was a facility for air sports, highly valued for this purpose by users and some local residents, as evidenced by earlier consultation responses. Although the Aerodrome closed in 2014, this facility and its open character would be lost as a result of development of this site. However, the Council believes the boundary to the allocated site allows the possibility for air sports to return to the location at a future date, although the compatibility of air sports with new

housing on the allocated site and surrounding sensitive environmental assets would need to be investigated.

- 6.210 As mentioned above, Policy SP 18 requires future applications to incorporate formal and informal open spaces. These should contribute to the wider strategic green infrastructure corridor from St Albans through to Hertford. In the Landscape Capacity Study, this site was assessed as having medium landscape sensitivity and therefore development of the site was considered to have a minor negative effect on landscape character. To address this, Policy SP 18 requires proposals to implement a landscape and planting strategy, particularly towards the northern edge of the site to minimise its visual impact on the surrounding landscape and long distance views including views from and across the Mimram valley. As this site is not within the Green Belt, a negligible effect on the retention of local distinctiveness was considered appropriate.
- 6.211 Although the site would be screened from several listed buildings within between 250m and 1km of the site, there are a number of Listed Buildings in both Welwyn Hatfield and East Hertfordshire Districts whose setting could be affected by intervisibility with the site, giving rise to significant (uncertain) negative effects on heritage assets (SA objective 4.5). The landscaping proposals in Policy SP 18 mentioned above should help to mitigate these effects. However, to provide further safeguards, the policy also requires the protection and enhancement of heritage assets, both on-site and in the wider area through appropriate mitigation measures. Given that the site will deliver over 500 dwellings, Policy SP 15 The Historic Environment of Welwyn Garden City requires the Supplementary Planning Document to *"take[s] account of the unique heritage of the town and sets out a design framework and detailed guidance within which sites should come forward for development"*.
- 6.212 Tewinbury Site of Special Scientific Interest in East Hertfordshire District is within 500m of site SDS1 (WGC4), which means that the development could have a significant negative effect on biodiversity (SA objective 4.6). In addition, Birchall Wood Ancient Woodland is adjacent to the south eastern boundary of the site. Requirements to incorporate informal open space on the site to contribute to wider ecological networks and to provide safe routes for wildlife, protecting and enhancing wildlife assets, will help to mitigate the effects of the development, but in Policy SP 18 also requires that these proposals balance the need of recreation and nature by providing animal infrastructure and undisturbed areas. Mitigation is also provided by Policy SADM 16, which provides further safeguards regarding biodiversity.
- 6.213 A negligible effect is considered likely for flood risk (SA objective 2.2) as it is located in the Environment Agency's flood zone 1 (lowest risk). The site is located within outer impact zones of a source protection zone, resulting in a potential minor negative effect on water pollution (SA objective 4.8). To mitigate against this, under Policy SP 18, future proposals will need to incorporate new utilities including SuDs which could help improve and enhance local water quality.
- SA findings - economic objectives (6.1, 6.2, 6.3, 6.4, 6.5, 6.6)*
- 6.214 All strategic sites are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6) as they are in reasonable walking distance of an educational establishment which has been assumed to have existing or future capacity to accommodate more students.
- 6.215 Although SDS1 (WGC4) is not an existing employment area, it does contain jobs related to the current airfield uses, some of which may be replaced in a future development (e.g. cafe/ community use) but it is unlikely that the specific types of airfield jobs will be replaced within the Borough. Therefore, an uncertain effect was identified, with respect to SA objective 6.1 (Ensuring the supply, location and quality of business and employment sites). Policy SP 18 also seeks to ensure that future proposals incorporate a new small convenience shop in an accessible location to meet the day-to-day convenience shopping needs of new residents and to include community facilities, including a community hall.
- 6.216 In relation to the protection of mineral resources (SA objective 6.5), this site is considered to have a negligible effect.
- 6.217 The effects of SDS1 on other SA objectives were considered either to be negligible or not applicable.

Policy SP 19: South East of Welwyn Garden City – Strategic Allocation SDS2 (WGC5)

- 6.218 SDS2 (WGC5) is a strategic site allocated for residential led mixed use development. Land at Birchall Garden Suburb is allocated for development in both the Welwyn Hatfield Local Plan and the East Herts District Plan to accommodate approximately 2,550 new homes over the Plan-period, of which 1,350 will be in East Herts District and, 1,200 in Welwyn Hatfield Borough. The site will also provide an employment area (understood to be up to 12.20ha of land), and 15 Gypsy and Traveller pitches, of which 11 will be to meet Welwyn Hatfield's needs. **Policy SP 19** supports the site's development of the site and the development of a joint Masterplan setting out the quantum and distribution of land uses, access, and sustainable design and layout principles will be prepared by Welwyn Hatfield Borough Council and East Herts District Council.
- 6.219 The focus of the SA has been on the component of the site that falls within Welwyn Hatfield Borough, with the component of the site falling with East Herts being covered by the SA of the East Herts District Plan. References to the East Herts component are included in the SA where relevant to the achievement of SA objectives for the Welwyn Hatfield Local Plan. It should be noted that the combined development will give rise to cumulative effects that are likely to reinforce many of the effects identified in the SA of the Welwyn Hatfield component of the development.

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.220 This site is considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as they are all in reasonable walking distance of a range of services such as GP surgeries, convenience stores, post offices, hospitals, open space etc. Although this site already scores positively, Policy SP 19 requires future proposals to include healthcare (in the East Herts part of the development), which would benefit residents in Welwyn Hatfield as well recreation and leisure spaces to help encourage an active and healthy lifestyle.
- 6.221 This site is also considered to have a significant positive effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people). This site is proposing to deliver over 5% of the Borough's target for new housing, which should result in a significant positive effect in terms of contribution to Welwyn Hatfield's housing target. Policies SP 19 and SP 7 require this site to meet the delivery of 30% affordable housing and ensure that there is a wide mix of housing types, sizes and tenures including housing for older people and Gypsy and Traveller pitches, leading to a significant positive effect on SA objectives 5.2 and 5.3.

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

- 6.222 This site is considered to have a significant positive effect on SA objective 4.2 (Reduce greenhouse gas emissions from transport) and SA objective 4.3 (Avoid and reduce air pollution) due to its proximity to bus stops, employment areas and services. To strengthen these effects, Policy SP 19 requires applications to incorporate sustainable transport measures including the improvement of pedestrian links, cycle paths, passenger transport and community transport initiatives. The policy also requires proposals to incorporate strategic and local highway mitigation measures, including addressing impacts on the A414 in Hertford, the B195 and the A1(M).
- 6.223 SDS2 (WGC5) is considered to have significant negative effects on retaining local distinctiveness as the site is located on the edge of Welwyn Garden City, close to or within the Green Belt (SA objective 4.4). It was considered to have a minor negative effect on the landscape character and a negligible effect on open space (also SA objective 4.4). To address these negative effects, Policy SP 19 requires future applications to contribute to the wider strategic green infrastructure corridor from St Albans through to Hertford, through the incorporation of informal open spaces, landscaping and planting, which could create a buffer between the site and the wider countryside setting. This site is identified as a greenfield site and although it is located on non-agricultural land, it was considered to have a minor negative effect on SA objective 4.10 (Conservation and sustainable use of land).
- 6.224 This site is adjacent to Holwellhyde Farmhouse Listed Building, and development could have a significant negative effect on the setting of this heritage asset (SA objective 4.5). The landscaping proposals in Policy SP 19 that have been mentioned above should help to overcome this, but the policy also supports future applicants proposals to protect and enhance heritage assets. Given that the site will deliver over 500 dwellings, Policy SP 15 The Historic Environment

of Welwyn Garden City requires the Supplementary Planning Document to “take[s] account of the unique heritage of the town and sets out a design framework and detailed guidance within which sites should come forward for development”.

- 6.225 The site is adjacent to the Commons Local Wildlife Site and Local Nature Reserve designated sites, which could give rise to a significant negative effect on biodiversity (SA objective 4.6). Requirements to incorporate informal open space on the site to contribute to wider ecological networks and to provide safe routes for wildlife, protecting and enhancing wildlife assets, will help to mitigate the effects of the development, but in Policy SP 19 also requires that these proposals balance the need of recreation and nature by contributing to the wider ecological network and create safe routes for wildlife. Mitigation is also provided by Policy SADM 16, which provides further safeguards regarding biodiversity.
- 6.226 With respect to flood risk (SA objective 2.2), the site is located in the Environment Agency’s flood zone 1 (lowest risk) although the Strategic Flood Risk Assessment indicates a very small proportion of the site is in flood zones 2 or 3 due to an ordinary watercourse in the site. The site is located within outer impact zones of a source protection zone, resulting in a potential minor negative effect on water pollution (SA objective 4.8). To mitigate against this, under Policy SP 18, future proposals will need to incorporate new utilities including SuDs and flood mitigation, which could help improve and enhance local water quality.

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

- 6.227 As a mixed use site, which includes some employment uses, development of the site is considered likely to have a significant positive effect on the supply and location of employment land (SA objective 6.1). As the site is located in an area classified as being within an area between 20%-40% of the most deprived areas nationally, this site is considered to have a minor positive effect on encouraging economic investment in an area most in need of regeneration (SA objective 6.2). An uncertain significant positive effect was also identified in relation to access to education (SA objective 6.6) as the site is in reasonable walking distance of an educational establishment which has been assumed to have existing or future capacity to accommodate more students. The employment uses on the site could provide opportunities for training and skills development but this is uncertain. Policy SP 19 seeks to ensure that development of the site includes education facilities, including an all-through school in East Herts (primary and secondary).
- 6.228 In relation to the protection of mineral resources (SA objective 6.5), this site is considered to have a negligible effect.
- 6.229 All other scores identified were either negligible or non-applicable to the assessment of this site.

Other sites considered in Welwyn Garden City

- 6.230 Ten other sites including reasonable alternatives were considered for allocation in Welwyn Garden City and of these nine were allocated comprising HS1 (Pan01b), HS2 (WGC1), HS3 (Pea08), HS4 (Hal03), HS5 (Hol19), HS6 (Han91), HS7 (Hal02), HS8 (Pea24) for residential development and MUS1 (Han40) a retail led mixed use site. How92 was the only alternative site allocation in Welwyn Garden City. Combined, these sites will deliver up to 869 new homes. **The Welwyn Garden City Town Centre North Supplementary Planning Document and Policy SADM 19** Town Centre North Development Site, provides specific information on how site MUS1 (Han40) should be developed, while **Policy SADM 21** provides specific recommendations relating to the development of the other allocated sites in Welwyn Garden City.

Allocated sites

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.231 All other key sites in Welwyn Garden City are considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as they are all in reasonable walking distance of a range of services such as GP surgeries, convenience stores, post offices, hospitals, open space etc. Although positive, Policy SADM 21 includes recommendations, which could provide further help improve health. This includes recommendations to address air, noise and contaminated land issues at site HS3 (Pea08), HS4 (Hal03), HS6 (Han91), HS7 (Hal02) and HS8 (Pea24).

6.232 Sites HS1 (Pan01b), HS3 (Pea08), HS4(Hal03), HS5(Hol19) and MUS1 (Han40) are all considered to have a negligible effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people). These sites are expected to deliver between 17 and 110 new homes, which is less than 5% of the Objectively Assessed Housing Need. At sites HS2 (WGC1) and HS6 (Han91), it is proposed that there will be a delivery of enough dwellings (between 1-5% of the Borough's housing target) to result in a minor positive effect. HS2 (WGC1) has the largest capacity of up to 290 new homes. All sites allocated within Welwyn Garden City will provide enough dwellings to exceed the 11 new dwellings on site threshold, for the delivery of affordable housing.

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

6.233 All of the other key sites are considered to have a significant positive effect on SA objective 4.2 (Reduce greenhouse gas emissions from transport) and SA objective 4.3 (Avoid and reduce air pollution) due to their proximity to public transport (bus stops and train stations), employment and services. Policy SADM 21 includes recommendations which seek to address air quality issues across a number of sites. It also recommends the rationalisation of access arrangements and bus stop upgrades at HS1 (Pan01b), access arrangements and queuing traffic on Bridge Road East at HS3 (Pea08), acceptable vehicular and pedestrian access arrangements at HS4 (Hal03) and a rationalisation of access arrangements at HS7 (Hal02) and HS8 (Pea24). The SPD and Policy SADM 19 which cover MUS1 (Han40) require proposals to improve vehicle movement on surrounding roads, providing adequate parking and improving public transport.

6.234 With regards to protecting and enhancing open space and landscape character (SA objective 4.4), **MUS1 (Han40)** and **HS6 (Han91)** were identified as having a significant (uncertain) negative effect on open space, owing to their locations on existing open space. MUS1 (Han40) includes an area of amenity land known as Anniversary Gardens, which could be lost as a result of development, but in relation to this space, the SPD specifically states that *"the site currently incorporates an area of amenity land known as Anniversary Gardens which is a well-used landscaped area. Whilst the council would encourage the efficient use of land it is considered that any development must include an area of open space to ensure that any enhancements to the public realm incorporate an element of soft landscaping and to provide a replacement to the gardens."* Policy SADM 19 also supports this by requiring development to enhance the public realm and landscape and within the town centre.

6.235 In the case of **HS6 (Han91)**, the site is in an area associated with the ski slope and driving range which would be lost as a result of development, resulting in a significant negative effect on these facilities, but there are no specific mitigation recommendations regarding this in policy. All the other key sites in Welwyn Garden City were located outside an area of existing open space and therefore scored a negligible effect. Although HS2 (WGC1) was not considered to score negatively with respect to open space and amenity, Policy SADM 21 recommends that applicants consider easing Public Rights of Way across the site.

6.236 **HS2 (WGC1)** was the only site that is considered to have significant negative effects on retaining local distinctiveness according to the Green Belt Study (2014). All other sites are considered to have negligible, uncertain or minor negative effects on the open space, landscape character and retaining local distinctiveness. Most sites including **HS3 (Pea08)**, **HS4 (Hal03)**, **HS5 (Hol19)**, **MUS1(Han40)**, and **HS8 (Pea24)** are located on previously developed land and therefore were considered to have a significant positive effect on that element of SA objective 4.4, and in turn a minor positive effect on SA objective 4.10 (Conservation and sustainable use of land). Sites HS1 (Pan01b), HS2 (WGC1), and HS7 (Hal02), are all greenfield land and therefore considered to have negligible effect on SA objective 4.4, and in turn a minor negative effect on SA objective 4.10 (Conservation and sustainable use of land). HS6 (Han91) was the only site to be considered to have a negligible effect on SA objective 4.4 and a mixed minor positive and minor negative effect in relation to SA objective 4.10.

6.237 The majority of sites including HS1 (Pan01b), HS2 (WGC1), HS3 (Pea08), HS5 (Hol19) and HS8 (Pea24) were considered to have a negligible effect in relation to heritage assets and/or Conservation Areas (SA objective 4.5). Although they were often within 250m and 1km of a Listed Building, it was considered that barriers such as large road networks e.g. the A1(M) or railway lines and existing settlements would reduce their impact upon nearby heritage assets and their setting. Sites **MUS1 (Han40)** and **HS6 (Han91)** were considered to have an (uncertain)

significant negative effect owing to their location within Welwyn Garden City Conservation Area. To address this issue Policy SADM 21 recommends that future proposals consider the location of the site in relation to the Conservation Area and Listed Buildings at HS6 (Han91), while Policy SADM 19 requires future proposals to be designed with respect to the preservation and enhancement of the character of the Conservation Area.

- 6.238 Sites HS7 (Hal02) and a HS4 (Hal03) were considered to have an (uncertain) minor negative effect due to the presence of an Area of Archaeological Significance and the uncertainty around the development's potential impact upon the setting of the Conservation Area. To mitigate against negative effects occurring, Policy SADM 21 recommends that development takes account of the site's location within an Area of Archaeological Interest. All sites will need to ensure that they meet the requirement to protect, conserve and where appropriate enhance its heritage assets through design and detail which demonstrates cohesiveness with the key characteristics of a Garden City as set out in Policy SP 15. Due to the site capacity of HS4 (Hal03) "*applicants will be required to demonstrate how consideration of the historic character and significance of the town has been taken into account at an early stage in the design process through the preparation of masterplans or development briefs*".
- 6.239 The majority of sites were identified as having a minor negative effect upon biodiversity (SA objective 4.6) because they were found to be between 250m and 500m of Local Wildlife Sites or Ancient Woodland. Sites **HS2 (WGC1)** and **HS7 (Hal02)** were considered potentially to have significant negative effects on biodiversity. In the case of HS2 (WGC1), Creswick Plantation and The Commons Local Wildlife Sites were found to be within 250m of the site. Policy SADM 21 seeks to address this by recommending that ecological impacts need to be mitigated. For HS7 (Hal02), the Policy also recommends that development should take into account Blackfan Valley Local Wildlife Site and Tewinbury Sites of Special Scientific Interest in East Hertfordshire District. **HS5 (Hol19)** was the only site to score a negligible effect in relation to its potential impact upon biodiversity. The policy also recommends that applicants take into consideration habitat loss at HS1 (Pan01b), the proximity of Tewinbury Sites of Special Scientific Interest in East Hertfordshire District at HS4 (Hal03), ecological impacts at HS6 (Han91) and protected species at HS8 (Pea24). Mitigation is also provided by Policy SADM 16, which provides further safeguards regarding biodiversity.
- 6.240 None of the sites are considered to have significant or minor effects on flood risk (SA objective 2.2) as they are either located in the Environment Agency's flood zone 1 (lowest risk) or only a very small proportion of the site is in flood zones 2 or 3. Policy SADM 21 recommends that sustainable urban drainage is considered to address possibility of surface water flooding at HS2 (WGC1). HS2 (WGC1) is the only site located within outer impact zones of a source protection zone, resulting in a potential minor negative effect on water pollution (SA objective 4.8), while the other two sites were not located in any impact zone and therefore considered to have a negligible effect on this SA objective. In relation to the effects at HS2 (WGC1), Policy SADM 21 recommends that applications for the site consider wastewater infrastructure improvements. The policy also recommends that wastewater infrastructure improvements are made at sites, HS3 (Pea08), HS4 (Hal03) and HS6 (Han91).

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

- 6.241 **MUS1 (Han40)** is expected to provide 6,000 sqm retail floor space in Welwyn Garden City, which is in accordance with the identified need in the Welwyn Hatfield Retail Needs Study Update (2012). Therefore, a significant positive effect was identified, with respect to ensuring the supply, location and quality of business and employment sites (SA objective 6.1) and proximity to Welwyn Garden City (SA objective 6.3). The SPD and Policy SADM 19 require future development to provide a range of retail units, which would enhance the quality of the retail provision in the town.
- 6.242 The redevelopment of **HS6 (Han91)** would result in the loss of jobs associated with the ski slope and driving range. Re-provision of these facilities in the Borough is unlikely and therefore it was considered that a minor negative effect would be likely with respect to ensuring the supply, location and quality of business and employment sites (SA objective 6.1). However HS6 (Han91) was considered to have a minor positive effect on enhancing the vitality and viability of Welwyn Garden City town centre (SA objective 6.3).
- 6.243 None of the sites are considered to have significant or minor effects on or the sterilisation of mineral resources (SA objective 6.5).

6.244 The majority of other sites allocated in Welwyn Garden City scored a minor positive effect for SA objective 6.3 and negligible or were not applicable in the assessment of other economic objectives.

Reasonable alternatives

6.245 Two reasonable alternative sites for Welwyn Garden City were identified at the Proposed Submission Local Plan stage as shown in **Table 6.11**. One strategic alternative was identified, at WGC4 (Scenario 3) comprising the safeguarded land at Panshanger plus adjacent Green Belt land, and one site within Welwyn Garden City, How92.

Table 6.11: Reasonable alternative sites for Welwyn Garden City

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
N/A	How92	Woodside Centre, The Commons	22	N/A
N/A	WGC4 (Scenario 3)	Panshanger safeguarded land plus Green Belt land	725	N/A

SA findings - social objectives (1.1, 1.2, 5.1)

6.246 As with the allocated sites, sites How92 and WGC4 are considered to have a minor positive effect on SA objectives 1.1 and 1.2 (health). However, WGC4 (Scenario 3) would deliver 725 homes (as opposed to 650 homes in the proposed allocation for this location), which is over 5% of the Borough's target for new housing, and would result in a significant positive effect in terms of its contribution to meeting the housing target. How92 is considered to have a negligible effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people), because it is only expected to deliver up to 22 new homes.

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

6.247 **WGC4** is considered to have a significant positive effect on SA objective 4.2 (Reduce greenhouse gas emissions from transport) and SA objective 4.3 (Avoid and reduce air pollution) due to its proximity to public transport (bus stops and train stations), employment and services. **How92** scored a significant positive effect in relation to SA objective 4.2 (Reduce greenhouse gas emissions from transport) and SA objective 4.3 (Avoid and reduce air pollution) due to its proximity to (bus stops), employment areas and services. However, unlike the strategic sites and other key sites in Welwyn Garden City, the site was found to be beyond a reasonable walking distance to an employment centre and therefore considered to have only a minor positive effect in relation to SA objectives 4.3 and 4.4.

6.248 Although a significant proportion of **How92** includes amenity green space, it was assumed in the calculation of housing provision by WHBC that this would be retained. Therefore, with regards to protecting and enhancing open space and landscape character (SA objective 4.4) a negligible effect on open space was identified. The site was also considered to have a negligible and uncertain effect on the retaining local distinctiveness and landscape character. How92 is located on previously developed land and therefore considered to have a minor positive effect on that element of SA objective 4.4. However, in relation to SA objective 4.10 (Conservation and sustainable use of land), the site consists of a mixture of previously developed land and greenfield land therefore a mixed minor positive (maximising the sustainable use of previously developed land) and minor negative (loss of greenfield land) was also considered appropriate.

6.249 **WGC4** (Scenario 3) is predominantly located on the former Panshanger Aerodrome, which is defined by the Council as previously developed land, and was therefore considered to have a significant positive effect on SA objective 4.4 (Protect and enhance open space and landscape character) and in turn a minor positive effect on SA objective 4.10 (Conservation and sustainable use of land) by maximising the sustainable use of previously developed land. Although

considered in planning terms to be previously developed land, the site has an open character, and therefore was considered to have a significant (uncertain) negative effect on open space (also SA objective 4.4). In the Landscape Capacity Study, this site was assessed as having medium landscape sensitivity and therefore development of the site was considered to have a minor negative effect on landscape character. The WHBC Green Belt Review also identified **WGC4** (Scenario 3) as having a 'partial' effect in relation to maintaining the existing settlement pattern and therefore this site was considered to have a minor negative effect against this specific issue.

- 6.250 There are a number of Listed Buildings in both Welwyn Hatfield and East Hertfordshire Districts whose setting could be affected by intervisibility with **WGC4** (Scenario 3), giving rise to significant (uncertain) negative effects on heritage assets (SA objective 4.5). Tewinbury Site of Special Scientific Interest in East Hertfordshire District is within 500m of **WGC4** (Scenario 3), which means that the development could have a significant negative effect on biodiversity (SA objective 4.6). Similarly, **How92** was found to be adjacent to the Commons Local Nature Reserve and Local Wildlife Site and therefore was also considered to have a significant negative effect on biodiversity (SA objective 4.6).

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

- 6.251 Similar to the allocated sites, **both sites** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6). Although **WGC4** (Scenario 3) is not an existing employment area, it does contain jobs related to the current airfield uses, some of which may be replaced in a future development, but it is unlikely that the specific types of airfield jobs will be replaced within the Borough. Therefore, an uncertain effect was identified, with respect to SA objective 6.1 (Ensuring the supply, location and quality of business and employment sites). **How92** was considered to have a negligible effect on the supply and location of employment land (SA objective 6.1). As neither of the sites are within reasonable walking distance of Welwyn Garden City town centre, they were both considered to have to also have a negligible effect upon the enhancement and attraction of town centres (SA objective 6.3).
- 6.252 Neither of the sites are considered to have any effect on the sterilisation of mineral resources (SA objective 6.5).

Summary of SA findings for site allocations in Welwyn Garden City

- 6.253 The likely sustainability effects of the Welwyn Garden City sites are generally consistent and positive across all sites with regards to the economic and social objectives. The effects for the environmental objectives are less consistent and generally less positive with sites located on the edges of the town more likely to give rise to significant negative effects on biodiversity and landscape objectives, and sites closer to the town centre more likely to score positively for the re-use of previously developed land. Minor and significant negative effects identified in the appraisal will require mitigation. It is assumed that this will be realised through adherence to relevant strategic policies, such as **SADM 16 Ecology and Landscape**, **SP 9 Place Making and High Quality Design**, **SP 10 Sustainable Design and Construction**, **SP11 Protection and Enhancement of Critical Environmental Assets**, **SP 12 Strategic Green Infrastructure**, **SADM 15 Heritage**, **SADM 16 Ecology and Landscape**, **SP 15 The historic Environment of Welwyn Garden City**, **SP 16 Welwyn Garden City Town Centre**, and **SADM21, SP17, SP18 and SADM19 site specific policies**.
- 6.254 Taking the SA objectives as a whole, the reasonable alternative site **How 92** and **WGC4** (Scenario 3) did not perform more positively than the allocated sites.

Table 6.12: SA scores for the allocated and reasonable alternatives sites in and around Welwyn Garden City

SA Objectives		Likely Effects													
		Allocated Sites												Reasonable Alternatives	
		Strategic Sites				Other key sites									
		SDS1 (WGC4) ³³	SDS2 (WGC5)	SDS3 (Pea02b)	SDS4 (Pea02c)	HS1 (Pan01b)	HS2 (WGC1)	HS3 (Pea08)	HS4 (Hal03)	HS5 (Hol19)	MUS1 (Han40)	HS6 (Han91)	HS7 (Hal02)	HS8 (Pea24)	WGC4 ³⁴
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?		+	+	+	+	+	+	+	+	+	+	+	+	+	+
2.2 Ensure there is no increase in flood risk to people or property, taking into account climate change?		0	0	0	0	0	0	0	0	0	0	0	0	0	0
4.2 Significantly reduce greenhouse gas emissions from transport?	Proximity to employment and services	++	++	++	++	++	++	++	++	++	++	++	++	++	+
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++	++
4.3 Avoid and reduce air pollution	Proximity to employment and services	++	++	++	++	++	++	++	++	++	++	++	++	++	+

³³ Scenario 2 – 650 dwellings.

³⁴ Scenario 3 – 725 dwellings.

SA Objectives		Likely Effects														
		Allocated Sites													Reasonable Alternatives	
		Strategic Sites				Other key sites										
		SDS1 (WGC4) ³³	SDS2 (WGC5)	SDS3 (Pea02b)	SDS4 (Pea02c)	HS1 (Pan01b)	HS2 (WGC1)	HS3 (Pea08)	HS4 (Hal03)	HS5 (Hol19)	MUS1 (Han40)	HS6 (Han91)	HS7 (Hal02)	HS8 (Pea24)	WGC4 ³⁴	How92
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
4.4 Protect and enhance open space and landscape character, retaining local distinctiveness?	Open Space	--?	0	0	0	0	0	0	0	0	--?	--?	0	0	--?	0
	Landscape character	-?	-?	?	?	?	-?	?	?	?	?	?	?	?	-?	?
	Previously Developed Land	+++?	0	+++?	+++?	0	0	+++?	+++?	+++?	+++?	0	0	+++?	+++?	+?
	Retaining local distinctiveness	0	--	0	0	0	--	0	0	0	0	0	0	0	0	0
4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?	--?	--?	-- ?/+++ ?	-- ?/+++ ?	0	0	0	-?	0	--?	--?	-?	0	--?	0	
4.6 Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?	--?	--?	--?	--?	-?	--?	-?	-?	0	-?	-?	--?	-?	--?	--?	

SA Objectives		Likely Effects														
		Allocated Sites												Reasonable Alternatives		
		Strategic Sites				Other key sites										
		SDS1 (WGC4) ³³	SDS2 (WGC5)	SDS3 (Pea02b)	SDS4 (Pea02c)	HS1 (Pan01b)	HS2 (WGC1)	HS3 (Pea08)	HS4 (Hal03)	HS5 (Hol19)	MUS1 (Han40)	HS6 (Han91)	HS7 (Hal02)	HS8 (Pea24)	WGC4 ³⁴	How92
4.8 Avoid water pollution		-?	-?	0	0	0	-?	0	0	0	0	0	0	0	-?	-?
4.10 Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land		+?	-	+?	+?	-	-	+?	+?	+?	+?	+/-	-	+?	+?	+/-
5.1 Provide the right amount, type and tenure of housing to meet identified local needs?	Amount of housing	++	++	++	+	0	+	0	0	0	0	+	0	0	++	0
	Affordable housing	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
	Dwellings for older people	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
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	-/++	-/++	0	0	0	0	0	++?	-	0	0	?	0

SA Objectives	Likely Effects														
	Allocated Sites													Reasonable Alternatives	
	Strategic Sites				Other key sites										
	SDS1 (WGC4) ³³	SDS2 (WGC5)	SDS3 (Pea02b)	SDS4 (Pea02c)	HS1 (Pan01b)	HS2 (WGC1)	HS3 (Pea08)	HS4 (Hal03)	HS5 (Hol19)	MUS1 (Han40)	HS6 (Han91)	HS7 (Hal02)	HS8 (Pea24)	WGC4 ³⁴	How92
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?	N/A	N/A	+	+	N/A	N/A	N/A	N/A	N/A	+	N/A	N/A	N/A	N/A	N/A
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	0	0	++	++	0	0	+	+	+	++	+	+	+	0	0
6.4 Sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character?	N/A	N/A	0	0	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A
6.5 Avoid sterilisation of mineral resources	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?

Hatfield

Alternatives considered

- 6.255 Issues and Options alternatives SC6-SC8, PG15-PG16, PG19-PG20, PG35-PG38 relate to development of the policies in this section of the Proposed Submission Local Plan.
- Option SC6: Be guided by a reflection of the character and identity of the settlement that it adjoins;
 - Option SC7: Embody the key design principles of the original 'Garden City', in terms of layout, landscaping and architectural styles, regardless of its location;
 - Option SC8: Seize the opportunity to create a defining and ambitious new sense of character and identity based on 21st Century sustainable design principles that will endure for future generations.
 - Option PG15: If the regeneration project starts on time and is successfully delivered, do you agree that the Council should pursue a strategy aimed at securing a further phase of regeneration to achieve the extra floor space identified in the Retail and Town Centre Needs Assessment going forward to 2021?
 - Option PG16: On the assumption that the regeneration project is significantly delayed because of economic circumstances, do you agree that we should review the Council's strategy for Hatfield town centre, update previous evidence and, if appropriate, prepare an Area Action Plan (AAP) to bring forward proposals to meet the need for a more a vital town centre for Hatfield...
 - Option PG19: The Council pursue a strategy of improving the evening economy of both Hatfield and Welwyn Garden City town centres?
 - Option PG20: If yes, do you think we should have a strategy to identify specific areas of the town centres for the evening economy?
 - Option PG35: Possible broad directions of growth - North west of Hatfield
 - Option PG36: Possible broad directions of growth - West of the redeveloped part of Hatfield Aerodrome
 - Option PG37: Possible broad directions of growth - West of Ellenbrook & Roehyde
 - Option PG38: Possible broad directions of growth - South of Hatfield
- 6.256 A range of growth locations for Hatfield were appraised by the SA at both the Emerging Core Strategy stage (2012), and the Local Plan Consultation Document stage (2015). These are reported upon in Chapter 5 of this SA Report.
- 6.257 In addition, at the Emerging Core Strategy stage (2012) draft Policy CS 16: Hatfield Town Centre and draft Policy CS 17: University of Hertfordshire were subject to SA.
- 6.258 Further detailed consideration of the reasonable alternative site allocations for Hatfield appraised at the Proposed Submission stage is provided below.

Policy SP 20: Hatfield Town Centre Strategy

- 6.259 Policy SP 20 promotes the regeneration of Hatfield Town Centre and supports development within the town centre boundary. It sets out the objectives that the policy seeks to achieve and the criteria that will apply to larger scale development (over 1,000 sqm floorspace).

SA findings

- 6.260 The likely effects of the Policy on the SA Objectives are mainly positive although some mixed effects have also been identified.
- 6.261 Significant positive effects were identified in relation to encouraging economic investment in those areas most in need of regeneration (SA objective 6.2) and enhancing the vitality and attraction of Hatfield town retail centre (SA objective 6.3). The policy supports the regeneration of the town

centre as well as development within the town centre boundary that makes a positive contribution to improving the town centre's viability and vitality. The policy also seeks to enhance the quality of the town centre environment and public realm and seeks to provide long term management and maintenance which should improve its attractiveness, in turn helping to encourage economic investment. Further positive effects on these SA objectives are expected from the policy's support for improved access for pedestrians and cyclists and the better integration of public transport facilities as well as ensuring provision for the town centre markets and other events. The policy also seeks to support both new and existing community facilities.

- 6.262 Mixed effects have been identified in relation to SA objectives 4.2 (reduce greenhouse gas emissions from transport) and 4.3 (reduce air pollution) as the policy allows for the provision of car parking – although it is recognised the policy also has the objective of improving access for pedestrians and cyclists and enhancing and better integrating public transport facilities. Depending on the detailed parking requirements for new development within the Town Centre, additional parking provision may indirectly encourage ongoing car use within the Town Centre and routes into it.
- 6.263 No significant negative or uncertain effects are predicted in relation to this policy.

Policy SADM 22: Development within Hatfield Town Centre Core Retail Zone

- 6.264 Policy SADM 22 relates to development of the Council owned site at the eastern end of the town centre. The proposals are for high density, mixed use development comprising approximately 1,200 sqm of retail and 66 dwellings. The policy sets down the design and land use principles that will apply to development coming forward in this location.

SA findings

- 6.265 The findings of the SA of the site at 1 Town Centre and 3-9 Town Centre (MUS2) are presented along with other site allocations in the SA of **Policy SADM 26: New Dwellings in Hatfield**. The SA findings of the remainder of the policy text of SADM 22 are presented below.
- 6.266 A significant positive effect has been identified for SA objective 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres) as the policy seeks to reinforce the vitality and viability of the town centre through a mix of land uses.
- 6.267 Minor positive effects are expected for a number of objectives. The policy will have minor positive effect for health (SA objectives 1.1 and 1.2) and crime and anti-social behaviour (SA objective 2.1) on account of the policy supporting a range of local facilities, many of which may contribute to improving the physical and mental health of the Borough's residents and social inclusion. The policy ensures the vitality and viability of the town centre with benefits for the urban landscape and local identity resulting in minor positive effects for SA objective 4.4 (landscape character) and SA objective 4.5 (heritage assets).
- 6.268 The policy supports residential uses and an efficient use of land through the use of decked/multistorey parking resulting in minor positive effects for SA objective 5.1 (housing) and SA objective 4.10 (conservation and sustainable use of land) respectively. The policy will help contribute to the employment land supply and encourage a mixed economy resulting in a minor positive effect for SA objective 6.1 (ensure the supply, location and quality of business and employment sites). This might offer possible employment options, and will help to regenerate and renew disadvantaged areas resulting in a minor positive effect for SA objective 6.2 (encourage economic investment in those areas most in need of regeneration).
- 6.269 A mixed effect is expected for SA objective 4.2 (greenhouse gas emissions from transport) and 4.3 (air pollution). The policy encourages development elsewhere within the core retail zone to consider multistorey or decked car parking arrangements. This could lead to an increase in congestion and vehicle emissions. However the policy also requires consideration of opportunities to improve pedestrian and cycle connectivity to the wider network and to improve public transport connections. This would help to reduce emissions associated with a reliance on private car. However the effect is uncertain as it will depend primarily on travel choices made by residents.

Policy SADM 23: Acceptable uses outside the Core Retail Zone (The Common and Queensway Opportunity Areas)

- 6.270 This policy outlines acceptable uses outside the primary shopping area (The Common and Queensway). The Council will allow proposals for changes of use or development for office, hotel, residential, leisure, community or education uses provided that the proposal meets certain criteria. Proposals for new civic, cultural, community or leisure facilities or to modernise, extend or re-provide the existing facilities will be supported along with the retention of such facilities.

SA findings

- 6.271 One of the primary purposes of this policy is to support the regeneration of Hatfield town centre and its vitality and viability, which should give rise to a significant positive effect on SA objective 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres).
- 6.272 Other likely effects from the policy are either minor positive or negligible. The policy will have minor positive effect for health (SA objectives 1.1 and 1.2) and crime and anti-social behaviour (SA objective 2.1) on account of the policy supporting a range of local facilities, many of which may contribute to improving the physical and mental health of the Borough's residents and social inclusion. The policy ensures the vitality and viability of the town centre with benefits for the urban landscape and local identity resulting in minor positive effects for SA objective 4.4 (landscape character) and SA objective 4.5 (heritage assets).
- 6.273 Where an existing use is no longer required the policy will allow proposals for changes of use or development for office, community, cultural and residential uses. The reuse of units in general would have would have minor positive effect for SA objective 4.10 (conservation and sustainable use of land), while the reuse of units for residential purposes would have a minor positive effect for SA objective 5.1 (housing) and the reuse of units for education would have a minor positive effect for SA objective 6.6 (provide access to training, skills development).
- 6.274 Benefits for the economy are expected due to the policy helping to maintain the role and functionality of this area. Therefore minor positive effects are likely for the following economy related objectives: SA objectives 6.1 (ensure the supply, location and quality of business and employment sites), and 6.2 (encourage economic investment in those areas most in need of regeneration).

Policy SADM 24: Acceptable uses outside the Core Retail Zone (Lemsford Road Opportunity Area)

- 6.275 This policy outlines acceptable uses outside the Primary Shopping Area (Lemsford Road Opportunity Area). The policy will allow proposals for changes of use or development for retail, office, hotel, residential, leisure or community uses provided that the proposal would meet certain criteria. Proposals for new leisure facilities or to modernise, extend or re-provide the existing facilities will be supported along with the retention of the Swim Centre.

SA findings

- 6.276 A significant positive effect has been identified for SA objective 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres) as the policy seeks to reinforce the vitality and viability of the town centre through a mix of land uses.
- 6.277 Other likely effects from the policy are either minor positive or negligible. The policy will have minor positive effect for health (SA objectives 1.1 and 1.2) and crime and anti-social behaviour (SA objective 2.1) on account of the policy supporting a range of local facilities, many of which may contribute to improving the physical and mental health of the Borough's residents and social inclusion.
- 6.278 The policy ensures the vitality and viability of the town centre with benefits for the urban landscape and local identity resulting in minor positive effects for SA objective 4.4 (landscape character) and SA objective 4.5 (heritage assets).
- 6.279 Where an existing use is no longer required the policy will allow proposals for changes of use or development for retail, office, hotel, residential, leisure or community uses. The reuse of units in general would have would have minor positive effect for SA objective 4.10 (conservation and sustainable use of land), while the reuse of units for residential purposes would have a minor positive effect for SA objective 5.1 (housing).

6.280 Benefits for the economy are expected due to the policy helping to maintain the role and functionality of this area. Therefore minor positive effects are likely for the following economy related objectives: SA objectives 6.1 (ensure the supply, location and quality of business and employment sites), 6.2 (encourage economic investment in those areas most in need of regeneration) and 6.3 (enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres).

Policy SADM 25: High View Neighbourhood Shopping Centre (MUS3)

6.281 This policy identifies land at High View for mixed use development comprising residential, retail, service and community uses in accordance with the High View Supplementary Planning Document (April 2011).

SA findings

6.282 The findings of the SA of this site are presented along with other site allocations in the SA of **Policy SADM 26: New Dwellings in Hatfield.**

Policy SP21: University of Hertfordshire

6.283 This policy guides the future development and management of the University of Hertfordshire, which is a major employer in the area as well as a provider of sports and cultural facilities. The policy seeks to maximise the benefits of the University whilst balancing the accommodation needs of students with the needs of the resident community.

SA findings

6.284 A significant positive effect is expected for SA objective 6.6 (provide access to training, skills development) as the policy will ensure education facilities will continue to be supported.

6.285 The policy is anticipated to have a minor positive effect on crime and anti-social behaviour (SA objective 2.1) on account of the University being utilised for a range of recreational and leisure activities, many of which may contribute to improving the physical and mental health of Borough's residents and social inclusion.

6.286 The policy will support proposals for the enhancement of the University's campus provided that the proposals address the impact on the surrounding area in terms of traffic, noise, pollution, car parking and visual appearance. This will result in minor positive effects for SA objective 4.2 (greenhouse gas emissions from transport) SA objective 4.3 (air pollution) and SA objective 4.4 (landscape character).

6.287 A minor positive effect is expected for SA objective 5.1 (housing) as the policy seeks to provide new student accommodation on campus. The University is a major employer in the area as well as a provider of sports and cultural facilities providing valuable economic benefits to the area resulting in a minor positive effect for SA objective 6.1 (ensure the supply, location and quality of business and employment sites)

Summary of SA scores

6.288 The SA scores for the Proposed Submission Local Plan non-site allocation policies for Hatfield are shown in **Table 6.13.**

Table 6.13: Summary SA scores for non-site allocation policies for Hatfield

SA Question: Will the policy...	SP20	SADM 22	SADM 23	SADM 24	SP21
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	+	+	+	+	0
...lead to improved health for all? (1.2)	+	+	+	+	0
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	+	+	+	+	+
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0	0	0	0
...encourage involvement of the public in the planning process? (3.1)	0	0	0	0	0
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0	0	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	+/-	+/-?	0	0	+
...avoid and reduce air pollution? (4.3)	+/-	+/-?	0	0	+
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+	+	+	+	+
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	+	+	+	+	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	+	0	0	0	0
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0	0	0
...avoid water pollution? (4.8)	0	0	0	0	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	+	0	0	0	0

SA Question: Will the policy...	SP20	SADM 22	SADM 23	SADM 24	SP21
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	+	0	+	+	0
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	+?	+	+	+	+
...ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy? (6.1)	+	+	+	+	+
...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)	++	+	+	+	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	++	++	+	+	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	0	0	0	0	0
...avoid the sterilisation of mineral resources? (6.5)	0	0	0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	+	0	+	0	++

Policy SADM 26: New Dwellings in Hatfield

6.289 At the Proposed Submission Local Plan stage, fourteen site options including reasonable alternatives were considered in Hatfield (see **Figure 6.2**) and of these one strategic allocation and eight other key sites were selected for inclusion in the Proposed Submission Local Plan and these form **Policy SADM 26**, as shown in **Table 6.14**. Combined, these will contribute to the delivery of 2,097 new homes in the Borough.

Table 6.14: Site allocations in Hatfield

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
SDS5	Hat1	North West Hatfield	1,650	13,900 sqm
MUS2	HC100b	1-9 Town Centre	66	c 500 sq m retail
MUS3	HW100	High View SPD site	87	N/A
HS9	HE80	Land at Onslow St Audrey's School, Howe Dell	61	N/A
HS10	HS31	Garages at Hollyfield	14	N/A
HS11	Hat11 (Scenario 1)	Land at Southway	120	N/A
HS13	HS91	Land rear at Filbert Close	37	N/A
HS14	HE23	L Kahn Manufacturing Site, Wellfield Road	62	N/A

6.290 See **Table 6.16** for a summary of the appraisal scores.

6.291 The summary of the results of the assessment of these sites begins with a review of the strategic allocation at **SDS5 (Hat1)** before combining the review of the summary of results for sites across Hatfield.

Policy SP 22: North West Hatfield – Strategic Allocation Hat1 (SDS5)

6.292 Hat1 (SDS5) is a residential-led mixed use site which will deliver up to 1,650 new homes, 11 on-site Gypsy and Traveller pitches, new primary and secondary schools and a small neighbourhood shopping centres including convenience retail floorspace. **Policy SP 22** supports development of the site. This policy also supports the preparation of a Masterplan and a Supplementary Planning Document.

SA findings - social objectives (1.1, 1.2, 5.1)

6.293 This site is considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as it is in reasonable walking distance of a range of services such as GP surgeries, convenience stores, post offices, hospitals, open space etc. Although this site scores positively, Policy SP 22 seeks to ensure the future community is able to maintain an active and healthy lifestyle by ensuring the site includes community facilities, including healthcare and leisure facilities and sustainable transport links including cycle paths and improved pedestrian paths. The site is expected to deliver over 5% of the Borough's Objectively Assessed Housing Need, and deliver a range of housing to meet different needs. To maximise the benefits of housing to be delivered on the site, Policy SP 22 and SP 7 seek to deliver 25% affordable housing and ensure that a wide mix of housing types, sizes and tenures including housing for older people. As a result, it is considered to have a significant positive effect in relation to SA objective 5.1 (Provide the right amount, type and tenure of housing to meet identified local needs).

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

- 6.294 This site was considered to have a significant positive effect on SA objective 4.2 (Reduce greenhouse gas emissions from transport) and SA objective 4.3 (Avoid and reduce air pollution) due to its proximity to bus stops, employment areas and services. Although positive, Policy SP 22 requires proposals to sustainable transport measures including the improvement of pedestrian links, cycle paths, passenger transport and community transport initiatives, which will help to reinforce the benefits of existing public transport links. In addition, the policy also requires proposals to consider suitable access arrangements and any necessary wider strategic and local highway mitigation measures, which may help improve local air quality. Policy SP 22 also requires that the development of the site brings forward a new neighbourhood centre in an accessible location to meet local retail needs.
- 6.295 In relation to the protection and enhancement of open space and landscape character (SA objective 4.4) a significant negative effect was identified in relation to retaining local distinctiveness because the Green Belt Review scored the site as making a significant contribution in relation to maintaining the existing settlement pattern. This site was assessed as having medium landscape sensitivity and therefore considered to have a minor negative effect on landscape character. As a significant proportion of the site is located within Grade 2 land according to the agricultural land classification, a significant negative effect was also identified in relation to SA objective 4.10 (Conservation and sustainable use of land).
- 6.296 In addition to the creation of informal open spaces, Policy SP 22 requires proposals to include landscaping and planting, which could reduce the impact of the site on the local landscape, while also preventing development on the most arable land. A negligible effect was identified in relation to open space and previously developed land. Policy SP 22 requires proposals to include formal and informal open spaces for leisure and recreation, general play, sports, allotments and community orchards, which will help to ensure that future communities have access to open space. The policy also seeks to ensure that new open spaces contribute to the wider strategic green infrastructure corridor which is being created from St Albans through to Hertford. This will help secure resident's access to open space both within and outside the development.
- 6.297 Owing to the proximity of the site to The Old Cottage, Green Lanes (a Listed Building), SDS5 (Hat1) is considered to have a potentially significant adverse effect upon the Borough's historic environment (SA objective 4.5). To overcome this, Policy SP 22 requires proposals to protect and enhance the setting of the Listed Building. In relation to the protection and enhancement of local biodiversity (SA objective 4.6), SDS5 (Hat1) was considered to have a minor negative effect. As well as the additional informal and formal open space provision for recreational uses and landscaping and planting proposals, Policy SP 22 also requires applications to ensure that these measures contribute to the wider ecological network through ensuring that they provide safe routes for wildlife, protecting and enhancing wildlife assets.
- 6.298 Development of the site is likely to have a negligible effect in relation to the increase in flood risk to people or property (SA objective 2.2) and water pollution (SA objective 4.8) because it is outside flood zones 2 or 3 and not located within an inner or outer impact source protection zone. In addition, Policy SP 22 requires proposals for the site to include necessary new utilities infrastructure, including flood mitigation, upgrades to the local sewerage network and SuDs, which could help prevent any future development from increasing flood risk on the site and elsewhere as well as protect and enhance the quality of local water.

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

- 6.299 As a mixed use site, which includes some employment uses, it is considered to have a significant positive effect on the supply and location of employment land (SA objective 6.1). As the site is located in an area classified as being within 20% of the most deprived areas nationally, this site is also considered to have a significant positive effect on encouraging economic investment in an area most in need of regeneration (SA objective 6.2). An uncertain significant positive effect was also identified in relation to access to education (SA objective 6.6) as the site is in reasonable walking distance of an educational establishment. The employment uses on the site could provide opportunities for training and skills development but this is uncertain. Policy SP 22 seeks to ensure that development of the site includes education facilities.

- 6.300 This site was considered to have a negligible impact upon the sterilisation of mineral resources (SA objective 6.5).
- 6.301 All other scores identified were either negligible or non-applicable to the assessment of this site.

Other sites in Hatfield

- 6.302 A total of fourteen sites including reasonable alternatives were considered across Hatfield. Of these one was identified as a strategic allocation (discussed above). A further seven sites were allocated across Hatfield and these are MUS2 (HC100b), MUS3 (HW100), HS9 (HE80), HS10 (HS31), HS11 (Hat11 Scenario 1), HS13 (HS91) and HS14 (HE23). Six reasonable alternative sites were considered at Hat2, Hat5, Hat11 (Scenario 2), Hat11 (Scenario 3), Hat19 and HC94. Development of Site MUS2 (HW100b) will be guided by **Policy SADM 22** and MUS3 (HW100), which will be guided by **Policy SADM 25** and **High View Supplementary Planning Document (2011)**. Development of all other sites will be guided by **Policy SADM 26** and other policies in the Proposed Submission Local Plan.

Allocated sites

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.303 **All sites** are considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as they are all in reasonable walking distance of a range of services. Although these results are positive, Policy SADM 26 recommends the assessment and mitigation of air and noise pollution at all sites covered in the policy. It is also recommended that potential contamination and remediation strategies are considered by future Applicants at HS10 (HS31) and HE23 (HS14). In relation to HW100 (MUS3), one of the key aspirations of the SPD is to provide a new purpose built health centre as part of the re-development, to accommodate the existing GP surgery on Northdown Road, dentist and a pharmacy that are currently based in the shopping parade at High View.
- 6.304 **All sites** were also considered to have a significant positive effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people). All sites except HS11 (Hat11) are expected to have a negligible effect on housing delivery, as these sites will be delivering between 14 and 120 new homes, contributing to less than 1% (below 120 homes) of the overall housing target for the Borough. HS11 will deliver 120 homes. In relation to HW100 (MUS3), the SPD provides detailed information on housing types, size and design.

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

- 6.305 Due to their proximity to employment and services and transport services **all allocated sites** in Hatfield are considered likely to have a significant positive effect on both SA objective 4.2 (reduce greenhouse gas emissions from transport) and 4.3 (avoid and reduce air pollution). At sites HE80 (HS9) and Hat11 Scenario 1 (HS11) Policy SADM 26 recommends preferred access routes and junction upgrades, which could help to reduce air pollution around the site.
- 6.306 In relation to the increase in flood risk to people or property (SA objective 2.2) all sites are likely to have a negligible effect and the majority of sites are also considered to have a negligible effect on the avoidance of water pollution (SA objective 4.8) with the exception of HW100 (MUS3). This site is considered to have minor negative effects because a proportion of the site is located within inner or outer impact zones. Neither Policy SADM 26 nor the SPD for MUS3 (HW100) provide specific mitigation proposals to tackle these minor negative effects. However Policy SADM 26 recommends waste water infrastructure upgrades at HE80 (HS9), HS11 (Hat11) and HE23 (HS14).
- 6.307 In terms of the protection and enhancement of open space and landscape character and retaining local distinctiveness (SA objective 4.4) sites MUS2 (HC100b), MUS3 (HW100), HS31 (HS10) and HE23 (HS14) are all located on previously developed land and therefore considered to have uncertain significant positive effects in relation to the sustainable use of land. All other sites were identified on greenfield land and therefore considered to have a negligible effect on the assessment of the efficient use of land. In relation to landscape character, all sites were considered to have an uncertain effect, except for HS11 (Hat11 Scenario 1), which is considered to have a minor negative effect on landscape character (SA objective 4.4). HS11 (Hat11 Scenario

1) was also considered to have a significant negative impact on retaining local distinctiveness, with all other sites considered to have a negligible effect.

- 6.308 HS9 (HE80) and HS13 (HS91) are both located on existing open space and therefore considered to have a significant positive effect on open space. More than 25% of the southern half of HS9 (HE80) includes Onslow St. Audrey's Secondary School playing, which would be lost as a result of development. Similarly, a large proportion of HS13 (HS91) is within the Hazel Grove JMI School playing field, however according to Council Officers, this site has not been used as playing fields for over ten years. Nonetheless, the site is still designated as UOL (urban open land), which would be lost as a result of development at this site. A small proportion of HC100b (MUS2) was found to be classified as civic open space and therefore considered to have a minor negative effect on this element of this SA objective. All other sites were considered to have a negligible effect in relation to this issue. No specific mitigation has been recommended in relation to the loss of open space at these specific sites, however at HS11 (Hat11 Scenario 1), Policy SADM 26 recommends that Applications to develop the site consider the easement of Public Rights of Way.
- 6.309 Furthermore, the SPD for HW100 (MUS3) includes the provision of play space including a Local Equipped Area for Play' or 'LEAP' in the masterplan for the site. In relation to conservation and sustainable use of productive agricultural land (SA objective 4.10); **HS13 (HS91)** was the only site to be considered to have a significant negative effect. A significant proportion of HS9 (HE80) designated as grade 2 and 3 agricultural land, while the HS11 (Hat11) was on greenfield site and therefore both sites were considered to have a minor negative effect on the conservation and sustainable use of land (SA objective 4.10). All other sites were considered to have a minor positive effect.
- 6.310 The majority of Hatfield sites are considered likely to have a negative effect on biodiversity sites as they are in close proximity of designated nature sites. **MUS3 (HW100)**, **HS9 (HE80)**, **HS10 (HS31)** and **HS11 (Hat11 Scenario 1)** are located close enough to nature conservation sites to potentially have significant negative effects on this objective (SA objective 4.6). Sites MUS2 (HC100b) HS91 (HS13) were considered to have a minor negative effect on this SA objective. One site (HS14/HE23) was considered to have a negligible effect on biodiversity. All effects on biodiversity are currently uncertain as there may be opportunity to offer enhancements to green infrastructure and/or create new habitats as part of the new developments, but details are unknown at this stage. Policy SADM 28 recommends various mitigation strategies for sites in Hatfield including a bat survey at HS9 (HE80) and HS14 (HE23). An assessment of ecological effects and potential mitigation is also recommended at sites HS13 (HS91) and HS11 (Hat11 Scenario 1). Consideration of the potential impacts and mitigation is also recommended at HS11 (Hat11 Scenario 1), in relation to Water End SSSI.
- 6.311 Due to proximity to heritage assets and/or conservation areas, half the sites allocated in Hatfield are considered likely to have significant or minor (uncertain) negative effects on heritage assets (SA objective 4.5), with **MUS2 (HC100b)** and **MUS3 (HW100)** in particular considered to have significant (uncertain) effects. Sites HS9 (HE80) and HS11 (Hat11 Scenario 1) are likely to have a minor (uncertain) negative effect. All other sites were considered to have a negligible effect. These sites were found to be within 250m and 1km of a Listed Building, however it was considered that barriers such as large road networks e.g. the A1 (M) or railway lines and existing settlements would reduce their impact upon nearby heritage assets and their setting. Policy SADM 26 provides specific recommendations to reduce the impact of development on the Registered Park and Garden at HS9 (HE80).

SA findings - economic objectives (6.1, 6.3, 6.6)

- 6.312 **All sites** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6) as they are in reasonable walking distance of an educational establishment which is likely to have existing or future capacity to accommodate more students.
- 6.313 All of the sites are likely to have a negligible effect on the supply and location of employment land (objective 6.1) as they are not located within an employment area. **MUS3 (HW100)** is a mixed use site with retail space in Hatfield and was therefore considered to have a significant positive effect on the vitality and attraction of Hatfield Town centre (SA objective and 6.3). Furthermore as the site is within an area within the 20% most deprived areas within the district, it could also

help to encourage economic investment in those areas most in need of regeneration (SA objective 6.2).

- 6.314 None of the sites were considered to have a minor or significant negative effect upon the sterilisation of mineral resources (SA objective 6.5).

Reasonable alternatives

- 6.315 Six reasonable alternative sites for Hatfield were identified at the Proposed Submission Local Plan stage, with Hat11 and HC94, being considered for alternative uses, as shown in **Table 6.15**. One site, Hat 2 Land West of Hatfield, was a reasonable alternative strategic site.

Table 6.15: Reasonable alternative sites for Hatfield

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
N/A	Hat2	Land west of Hatfield	1,130	N/A
N/A	Hat5	Land north of Roehyde (south of Eillenbrook Lane)	140	N/A
N/A	Hat19	Land west of Bramble Road	20	N/A
N/A	Hat11 (Scenario 2)	South of Hatfield, 6 Hectares	N/A	6ha
N/A	Hat11 (Scenario 3)	South of Hatfield, 12.5 Hectares mixed use	Up to 300	Unspecified area
N/A	HC94	Hatfield Fire Station, Wellfield Road	33	N/A

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.316 Similar to the allocated sites, all sites are considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) and the provision of affordable housing and dwellings for older people). Two sites (Hat19 and HS94) are likely to have a negligible effect on the amount of housing (as they would each provide less than 1% of the Borough's housing target) while Hat5 and Hat11 (Scenario 3) are expected to deliver between 1-5% of the new homes and therefore considered to have a minor positive effect. **Hat2** has a capacity for 1,130 dwellings and therefore was considered to have a significant positive effect. Hat11 (Scenario 2) was not assessed against SA objective 5.1, because it was being considered for employment use only.

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

- 6.317 Similar to the allocated sites, all reasonable alternatives considered in Hatfield are considered likely to have a significant positive effect on both SA objective 4.2 (reduce greenhouse gas emissions from transport) and 4.3 (avoid and reduce air pollution). Hat11 (Scenario 3) was not assessed for its proximity to services as this is for employment uses only.
- 6.318 In relation to retaining local distinctiveness (landscape impacts) assessed in SA objective 4.4, **all reasonable alternative sites with the exception of reasonable alternative HC94** were considered to have a significant negative effect. With the exception of HC94, negative effects were also identified in relation to landscape character for all sites with significant negative effects identified for **Hat2**, and **Hat11 (Scenario 3) site options**. All other assessments considered in relation to landscape matters were considered negligible, except HC94 which was assessed as having an uncertain significant positive effect for the re-use of previously developed land. In relation to conservation and sustainable use of productive agricultural land (SA objective 4.10), all sites were considered to have minor or significant negative scores with **Hat2**, **Hat5** and **Hat19** considered to have potentially significant negative effects.

- 6.319 Owing to the proximity of heritage sites/ Conservation Areas and biodiversity assets all sites except HC94 are considered to have minor or significant negative effects with **Hat2** and **Hat5** considered to have significant negative effects upon heritage (SA objective 4.5) and **Hat2**, **Hat5** and **both Hat11 scenarios** were considered to have significant negative effects upon biodiversity (SA objective 4.6).
- 6.320 In relation to the increase in flood risk to people or property (SA objective 2.2) with the exception of Hat 2, all sites are likely to have a negligible effect. Additional modelling work undertaken for the Level 2 SFRA 2015 showed that 5% of Hat 2 is within FZ3 and 9.1% in FZ2. Therefore it is assumed to have a minor negative effect all sites are likely to have a negligible effect. With respect to the avoidance of water pollution (SA objective 4.8) Hat2, Hat5, Hat19 and HC94 were all considered to have minor negative effects because a proportion of these sites are located within an inner or outer impact zones.

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

- 6.321 **All sites** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6) as they are in reasonable walking distance of an educational establishment which is likely to have existing or future capacity to accommodate more students.
- 6.322 **HC94** was considered to have a significant positive effect on the vitality and attraction of Hatfield town centre (SA objective 6.3). Both Hat11 scenarios are within reasonable walking distance of two areas within the 20-40% most deprived areas within the Borough and therefore considered to have a minor positive effect, as they could also help to encourage economic investment in those areas most in need of regeneration (SA objective 6.2). Both Hat11 scenarios are also located within reasonable walking distance of Welham Green and therefore considered to have minor positive effects in helping to sustain the rural economy and business in the village (SA objective 6.4).
- 6.323 Hat2 was the only site within a preferred area for mineral extraction, according to the Minerals Local Plan 2007, and was therefore considered to have an uncertain minor negative effect on SA objective 6.5. All other sites were considered to have a negligible effect upon the sterilisation of mineral resources.
- 6.324 All other effects assessed for the economic objectives were either negligible or non-applicable to the assessment of these sites.

Summary of SA findings for site allocations in Hatfield

- 6.325 The likely sustainability effects of the Hatfield sites are generally consistent and positive across all sites with regards to the economic and social objectives with HC100B particularly contributing towards town centre vitality and health. The effects for the environmental objectives are less consistent and generally less positive with all but half of the sites expected to have a negative effect on heritage and/or conservation areas with the majority of the sites located around or close to the outskirts of Hatfield likely to have the most significant impacts. The majority of sites are likely to have a negative impact on biodiversity.
- 6.326 Minor and significant negative effects identified in the appraisal will require mitigation. It is assumed that this will be realised through adherence to relevant strategic and development management policies, such as SADM 16 Ecology and Landscape, SP 9 Place Making and High Quality Design, SP 10 Sustainable Design and Construction, SP11 Protection and Enhancement of Critical Environmental Assets, SP12 Strategic Green Infrastructure, SADM 15 Heritage, and SADM 16 Ecology and Landscape. In addition, the Hatfield specific policies provide further guidance on delivery of development that should help to address significant negative effects, including in Policies SP 20: Hatfield Town Centre Strategy, SADM 22: Development within the Core Retail Zone. SADM 23: Acceptable Uses outside the Core Retail Zone (The Common and Queensway Opportunity Areas), SADM 24: Acceptable Uses outside the Core Retail Zone (Lemsford Road Opportunity Area), SADM 25: High View Neighbourhood Shopping Centre, SADM 26: New Dwellings in Hatfield and SP 22: North West Hatfield.
- 6.327 Taking the SA objectives as a whole, the reasonable alternative sites did not perform more positively than the allocated sites, with the exception of HC94, which performed well with respect to previously developed land, and its potential contribution to the vitality of Hatfield town centre,

and because the effects it would have on biodiversity and heritage are likely to be less than some of the allocated sites. With respect to the reasonable alternative strategic site Hat 2, many of the effects were similar. In terms of significant effects Hat2 did not perform as well as the allocated strategic site Hat1 (SDS5) with respect to landscape character (SA objective 4.4) and biodiversity (SA objective 4.6).

Table 6.16: SA scores for the allocated and reasonable alternative sites in and around Hatfield

SA Objectives		Likely Effects												
		Allocated Sites								Reasonable Alternatives				
		Strategic Sites	Other key sites											
		SDS5 (Hat1)	MUS2 (HC100b)	MUS3 (HW100)	HS9 (HE80)	HS10 (HS31)	HS11 (Hat1) ³⁵	HS13 (HS91)	HS14 (HE23)	Hat2	Hat5	Hat1 ³⁶	Hat11 ³⁷	Hat19
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?		+	+	+	+	+	+	+	+	+	+	+	+	+
2.2 Ensure there is no increase in flood risk to people or property, taking into account climate change?		0	0	0	0	0	0	0	0	-	0	0	0	0
4.2 Significantly reduce greenhouse gas emissions from transport?	Proximity to employment and services	++	++	++	++	++	++	++	++	++	++	++	++	++
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++
4.3 Avoid and reduce air pollution	Proximity to employment and services	++	++	++	++	++	++	++	++	++	++	N/A	++	++

³⁵ Scenario 1 – 120 dwellings

³⁶ Scenario 2 - 6ha of employment.

³⁷ Scenario 3 – 12.5ha mixed use site combining residential and employment.

SA Objectives		Likely Effects													
		Allocated Sites								Reasonable Alternatives					
		Strategic Sites	Other key sites												
		SDS5 (Hat1)	MUS2 (HC100b)	MUS3 (HW100)	HS9 (HE80)	HS10 (HS31)	HS11 (Hat11) ³⁵	HS13 (HS91)	HS14 (HE23)	Hat2	Hat5	Hat11 ³⁶	Hat11 ³⁷	Hat19	HS 12 (HC94)
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++	++
4.4 Protect and enhance open space and landscape character, retaining local distinctiveness?	Open Space	0	-?	0	--?	0	0	--?	0	--?	0	0	0	0	0
	Landscape character	-?	?	?	?	?	-?	?	?	--?	-?	-?	--?	-?	?
	Previously Developed Land	0	+++?	+++?	0	+++?	0	0	+++?	0	0	0	0	0	+++?
	Retaining local distinctiveness	--	0	0	0	0	--	0	0	--	--	--	--	--	0
4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?		--?	--?	--?/+	-?	0	-?	0	0	--?	--?	-?	-?	-?	0
4.6 Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?		-?	-?	--?	--?	--?	--?	-?	0	--?	--?	--?	--?	-?	-?

SA Objectives		Likely Effects													
		Allocated Sites								Reasonable Alternatives					
		Strategic Sites	Other key sites												
		SDS5 (Hat1)	MUS2 (HC100b)	MUS3 (HW100)	HS9 (HE80)	HS10 (HS31)	HS11 (Hat11) ³⁵	HS13 (HS91)	HS14 (HE23)	Hat2	Hat5	Hat11 ³⁶	Hat11 ³⁷	Hat19	HS 12 (HC94)
4.8 Avoid water pollution		0	0?	-?	0	0	0	0	0	-?	-?	0	0	-?	-?
4.10 Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land		--	+?	+?	-	+?	-	--	+?	--	--	-	-	--	+?
5.1 Provide the right amount, type and tenure of housing to meet identified local needs?	Amount of housing	++	0	0	0	0	0	0	0	++	+	N/A	+	0	0
	Affordable housing	++	++	++	++	++	++	++	++	++	++	N/A	++	++	++
	Dwellings for older people	++	++	++	++	++	++	++	++	++	++	N/A	++	++	++
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	++	0	0	0	0	0	++	++	0	?

SA Objectives	Likely Effects													
	Allocated Sites								Reasonable Alternatives					
	Strategic Sites	Other key sites												
	SDS5 (Hat1)	MUS2 (HC100b)	MUS3 (HW100)	HS9 (HE80)	HS10 (HS31)	HS11 (Hat11) ³⁵	HS13 (HS91)	HS14 (HE23)	Hat2	Hat5	Hat11 ³⁶	Hat11 ³⁷	Hat19	HS 12 (HC94)
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?	++	++	+	N/A	N/A	N/A	N/a	N/A	N/A	N/A	+	+	N/A	N/A
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	0	++	+	+	0	0	0	+	+	+	0	0	0	++
6.4 Sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character?	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+	+	N/A	N/A
6.5 Avoid sterilisation of mineral resources	0	0	0	0	0	0	0	0	-?	0	0	0	0	0
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	N/A	+++?	+++?	+++?

The Villages North of Welwyn Garden City

Alternatives considered

- 6.328 Issues and Options alternatives PG44, PG43, PG42 relate to development of the policies in this section of the Proposed Submission Local Plan.
- Option PG44: Possible broad directions of growth - North of Woolmer Green.
 - Option PG43: Possible broad directions of growth - Oaklands and Mardley Heath.
 - Option PG42: Possible broad directions of growth - South and north west of Welwyn.
- 6.329 A number of potential village allocation sites were appraised at both the Emerging Core Strategy stage (2012) and the Local Plan Consultation Document stage (2015), as reported upon in Chapter 5 of this SA Report.
- 6.330 At the Proposed Submission Local Plan stage, twelve site options for residential development were considered for allocation in the villages of Oaklands and Mardley Heath, Woolmer Green and Welwyn which are located to the north of Welwyn Garden City. Of these, seven were allocated for development comprising HS20 (Wel3), HS19 (Wel4) and HS18 (Wel11) in Welwyn, HS15 (WGr1) in Woolmer Green, HS17 (OMH5), HS16 (OMH8) and a Gypsy Traveller site at HS32 (GTLAA04). Combined these will deliver a total 242 new homes plus six pitch extensions for Gypsy and Travelling Communities, as shown in **Table 6.17**.
- 6.331 **Policy SADM 27** supports development of the allocated sites at Woolmer Green, **Policy SADM 28** supports development of the allocated sites at Oaklands and Mardley Heath and **Policy SADM 29** supports development of the allocated sites at Welwyn.




Table 6.17: Site allocations at the villages north of Welwyn Garden City

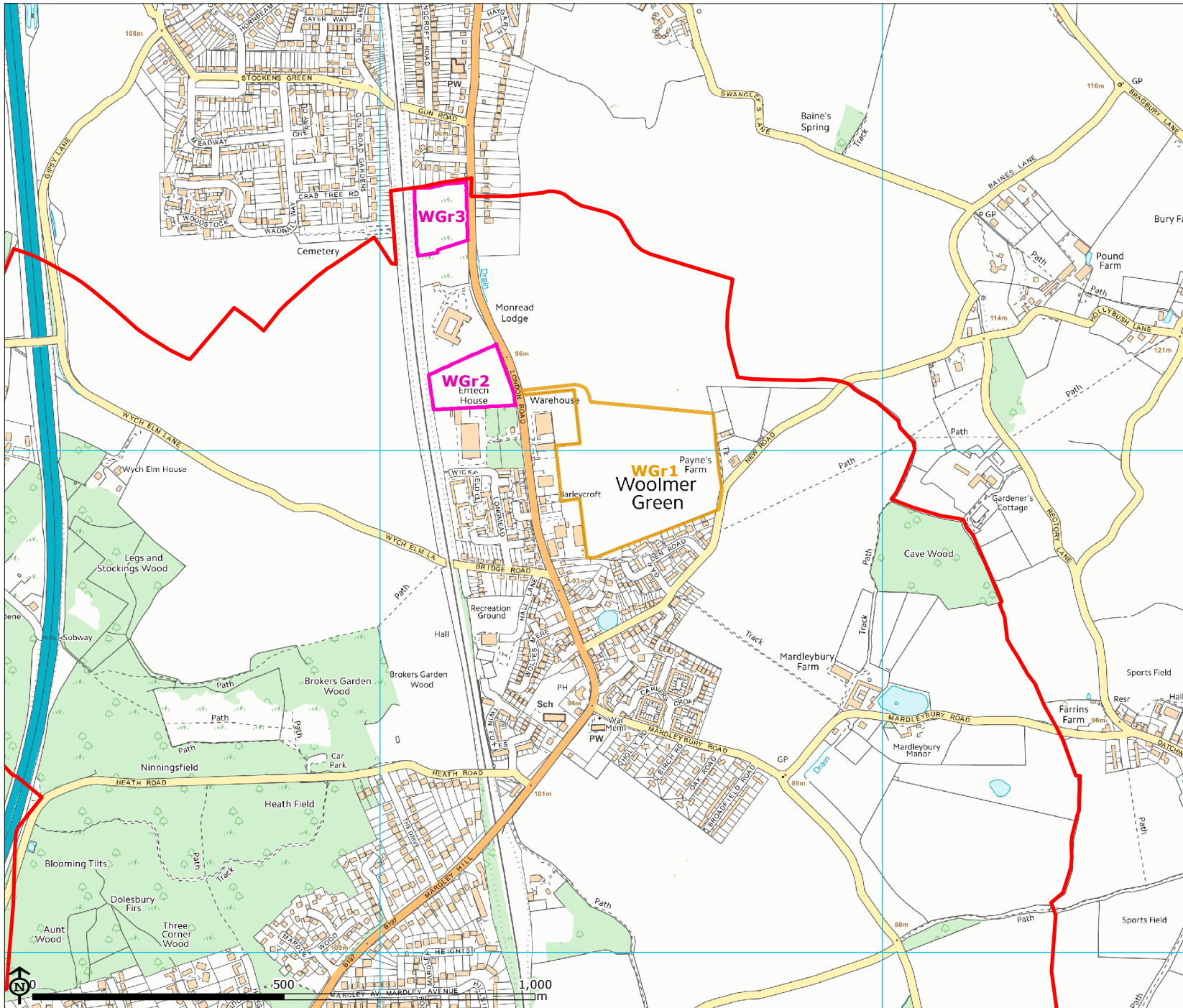
Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
HS15	WGr1	Land east of London Road, Woolmer Green	150	N/A
HS16	OMH8	2 Great North Road, Oaklands & Mardley Heath	5	N/A
HS17	OMH5	Land Rear of 2-12 Great North Road, Oaklands & Mardley Heath	20	N/A
HS18	Wel11	The Vineyards, Codicote Road, Welwyn	30	N/A
HS19	Wel4	Sandyhurst, The Bypass, Welwyn	30	N/A
HS20	Wel3	Land at School Lane, Welwyn	7	N/A
HS32	GTLAA04	Four Oaks, Great North Road, Oaklands & Mardley Heath	6	N/A

- 6.332 See **Table 6.19** for a summary of the appraisal scores.
- 6.333 The other sites, Wel1, Wel2 and Wel15 in Welwyn, WGr2 and WGr3 in Woolmer Green and OMH7 in Oaklands and Mardley Heath were identified as reasonable alternatives. See **Figures 6.3 – 6.5**. The main findings of the effects of development of these sites in relation to the social, environment and economic objectives used to provide a framework for assessment are summarised below.

Figure 6.3

Allocated and Reasonable Alternative Sites in and around Woolmer Green

-  Welwyn Hatfield Borough
-  Allocated Site
-  Reasonable Alternative Site



Source: Ordnance Survey, WHBC

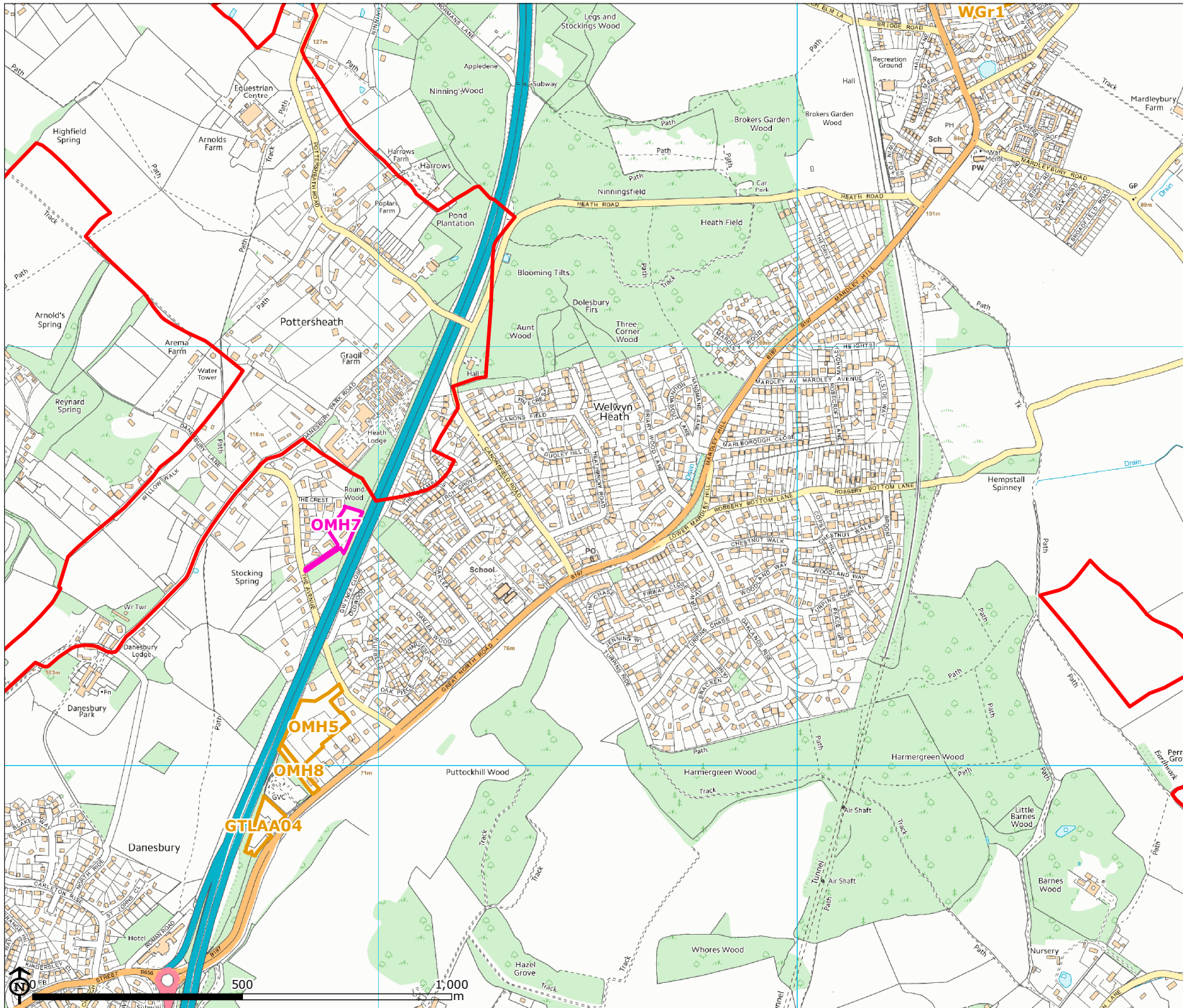
Map Scale @ A4: 1:10,830



Figure 6.4

Site Allocations and Reasonable Alternatives in and around Oaklands and Mardley Heath

- Welwyn Hatfield Borough
- Allocated Site
- Reasonable Alternative Site



Source: Ordnance Survey, WHBC

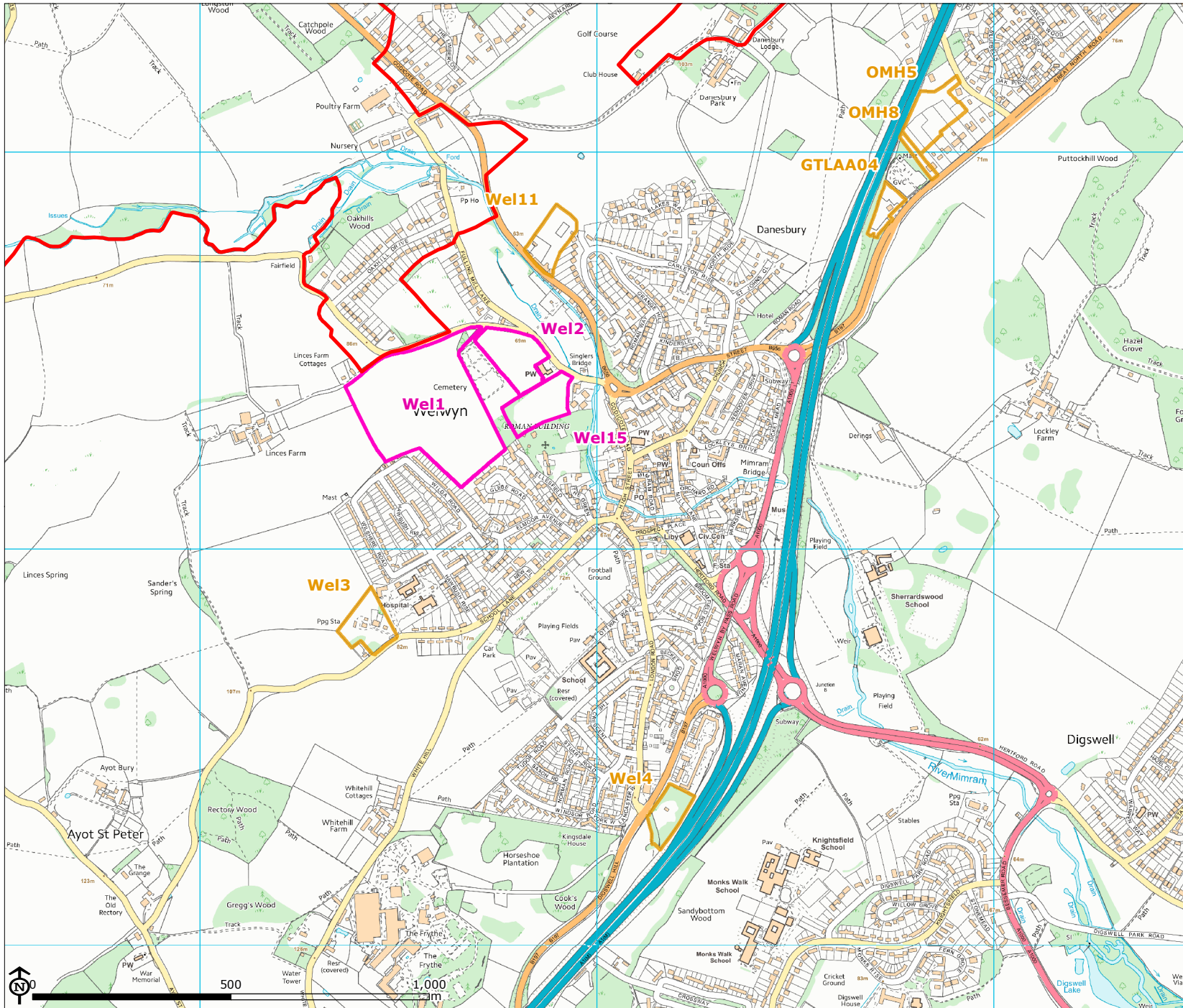
Map Scale @ A4: 1:12,980



Figure 6.5

Allocated and Reasonable Alternative Sites in and around Welwyn

- Welwyn Hatfield Borough
- Allocated Site
- Reasonable Alternative Site



Source: Ordnance Survey, WHBC

Map Scale @ A4: 1:13,710



Policy SADM 27: Woolmer Green

Policy SADM 28: Oaklands and Marley Heath

Policy SADM 29: Welwyn

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.334 All the allocated sites were considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as they are all in reasonable walking distance of a range of services such as GP surgeries, open space etc. Policy SADM 28 (covering the Oaklands and Mardley Heath sites) recommends that proposals mitigate air and noise pollution, while SADM 29 (covering Welwyn sites) require proposals to incorporate assessment and design measures to deliver satisfactory noise and air quality. Both Policies SADM 28 and SADM 29 also recommend that proposals consider the use of enhanced visibility splays which will improve pedestrian safety around busy roads.
- 6.335 All the allocated sites were also considered to have a significant positive effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people), except for HS20 (Wel3), which was considered to have a negligible effect and the Gypsy and Traveller site HS32 (GTLAA04). **HS32 (GTLAA04)** was the only site considered to contribute significantly to the supply of homes, as it is expected that the site will deliver more than 5% of the Borough's Gypsy and Travellers needs and therefore is assumed to have a significant positive effect. The site at Woolmer Green, HS15 (WGr1), is expected to deliver between 1-5% of the Borough's housing target and therefore scored a minor positive effect. All other sites are only expected to deliver between 5 and 30 new homes and were therefore considered to have a negligible effect on meeting the Borough's housing need.

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

- 6.336 **HS15 (WGr1)** in Woolmer Green was the only site considered to have significant positive effects for both the proximity to employment and services and public transport services for SA objectives 4.2 and 4.3. Sites **HS20 (Wel3)**, **HS19 (Wel4)** and **HS18 (Wel11)** and **HS16 (OMH5)** were all found to be within 720m of food/convenience stores which can help to minimise travel distances and car use related greenhouse gases (SA objective 4.2) and avoiding and reducing air pollution (SA Objective 4.3) and were therefore considered to have a minor positive effect. All other sites were considered to have a negligible effect in relation to this SA objective. **HS20 (Wel3)** was the only site to score a negligible effect in relation to the proximity to transport services for SA objectives 4.2 and 4.3.
- 6.337 Regarding landscape character (SA objective 4.4), **HS16 (OMH5)** and **HS16 (OMH8)** were considered to have a significant (uncertain) negative impact according to the Landscape Sensitivity and Capacity Study. It is expected that these impacts will be reduced, through adherence to Policy SADM 28 which recommends that proposals to retain and protect the northern wooded area and avoid and mitigate impacts on the amenity of adjacent properties. This should improve screening of the site, and help reduce negative landscape effects. HS32 (GTLAA04) is considered to have an uncertain effect on landscape character (SA objective 4.4) as it was not assessed as part of the Landscape Sensitivity and Capacity Study. All other sites are likely to have a minor negative effect. Policies SADM 27 and SADM 29 will expect proposals to address landscape impacts either through landscape buffers (suggested for the site in Woolmer Green) as well as compensatory planting and design measures (suggested at sites in Welwyn), which could provide some mitigation.
- 6.338 Sites **HS20 (Wel3)**, **HS19 (Wel4)**, **HS16 (OMH8)** and **HS32 (GTLAA04)** are all identified as previously developed land therefore it is considered they will have a significant positive impact on this component of SA objective 4.4 and in turn a minor positive effect on SA objective 4.10 (Conservation and sustainable use of land). All other sites were identified as greenfield sites and therefore a negligible effect was recorded with respect to the use of brownfield land and a minor negative effect on SA objective 4.10 (Conservation and sustainable use of land).
- 6.339 **HS18 (Wel11)** was the only site identified in the WHBC Green Belt Review as having a significant effect in relation to maintaining the existing settlement pattern (SA objective 4.4) and therefore is likely to have a significant negative effect. Mitigation is provided through policy SADM 29, which recommends that proposals consider opportunities to retain and protect trees, which could reduce

the impact upon the landscape as well as provide an element of mitigation for the effects of the development upon local biodiversity. The remaining sites are considered to have either minor negative or a negligible impact on retaining local distinctiveness. With regards to protecting and enhancing open space (SA objective 4.4), all of the sites are considered to have a negligible impact.

- 6.340 With the exception of **HS15 (WGr1)**, the majority of the sites are within 250m and 1km of a Listed Building, it was considered that barriers such as large road networks e.g. the A1(M) or railway lines and existing settlements would reduce their impact upon heritage assets and their settings. Therefore, **HS18 (Wel11)** and all sites in Oaklands and Mardley Heath were considered to have a negligible effect for SA objective 4.5 (Conservation of heritage and cultural assets). In the case of **HS15 (WGr1)**, the site is adjacent to Paynes Farmhouse Listed Building. Therefore, this site has the potential for a significant negative effect on the setting of those assets. Although there are barriers separating sites **HS20 (Wel3)** and **HS19 (Wel4)** from heritage assets, it was considered that there will still be some effect and therefore a minor negative effect was identified.
- 6.341 Due to the proximity of designated nature sites, the majority of allocated sites at the villages north of Welwyn Garden City are considered to have a minor (uncertain) impact on biodiversity (SA objective 4.6). However, **HS18 (Wel11)**, **HS17 (OMH5)** and **HS32 (GTLAA04)** were all considered to have a significant negative effect owing to their close proximity to local biodiversity sites including Danesbury Park Local Nature Reserve and Old North Road and Central Reservation and Lockleys Local Wildlife Site. As mentioned above, some mitigation has been incorporated into SADM 29 to reduce the impact of site **HS18 (Wel11)**. Mitigation is also provided by Policy SADM 16, which provides further safeguards regarding biodiversity in the Borough.
- 6.342 In relation to the increase in flood risk to people or property (SA objective 2.2), all sites are likely to have a negligible effect. Policy SADM 28 recommends that proposals consider sewage and drainage improvements at **HS32 (GTLAA04)**. In addition, SADM 29 (covering Welwyn sites) recommends that proposals incorporate SuDS across to prevent the pollution of groundwater. This could also prevent flooding elsewhere from surface water run-off.
- 6.343 All sites in Welwyn are located within the inner or outer impact zones of a source protection zone, resulting in a potential minor negative effect on water pollution (SA objective 4.8). Mitigation is potentially provided in policy SADM 29, which recommends that proposals consider the incorporation of SuDS for surface run-off, with the requisite number of treatment stages to prevent the pollution of groundwater. All other sites scored a negligible effect.
- SA findings - economic objectives (6.1, 6.2, 6.3, 6.4, 6.5, 6.6)*
- 6.344 **All the sites** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6) as they are in reasonable walking distance of an educational establishment which has been assumed to have existing or future capacity to accommodate more students. All allocated sites are likely to have a negligible effect on the supply and location of employment land (SA objective 6.1) and on the vitality of the Welwyn Garden City town centre (SA objective 6.3).
- 6.345 None of the sites are considered to have significant or minor effects regarding the sterilisation of mineral resources (SA objective 6.5).

Reasonable alternatives

- 6.346 Six reasonable alternative sites for the villages north of Welwyn Garden City were subject to SA at the Proposed Submission Local Plan stage, as shown in **Table 6.18**.

Table 6.18: Reasonable alternative sites for the villages north of Welwyn Garden City

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
N/A	WGr2	Land south of Monread Lodge, Woolmer Green	N/A	11,250 sqm

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
N/A	WGr3	Land adjacent to 52 London Road, Woolmer Green	40	N/A
N/A	OMH7	Land at 22 The Avenue, Oaklands & Mardley Heath	12	N/A
N/A	Wel1	Land at Kimpton Road, Welwyn	178	N/A
N/A	Wel2	Land east of Welwyn Cemetery, Welwyn	40	N/A
N/A	Wel15	Fulling Mill Lane, Welwyn	14	N/A

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.347 Similar to the allocated sites, all the reasonable alternative sites were considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) and a significant positive effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people), except for the employment site WGr2.

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

- 6.348 All sites in Woolmer Green (**WGr2** and **WGr3**) were considered to have significant positive effects for both the proximity to employment and services and transport services for SA objectives 4.2 and 4.3. The sites in Welwyn (**Wel1**, **Wel2** and **Wel15**) were only considered to have significant positive effects for proximity to public transport services for SA objectives 4.2 and 4.3. All other scores for the sites in Welwyn and OMH7 in Oaklands and Mardley Heath were identified as having a minor positive or negligible effect.
- 6.349 With the exception of the site in Oaklands and Mardley Heath, all reasonable alternative sites were considered to have an (uncertain) minor negative impact on landscape character (SA objective 4.4). OMH7 was recorded as having an uncertain effect as it was not assessed as part of the Landscape Sensitivity and Capacity Study. **OMH7** was the only site identified as previously developed land therefore it was considered to have a significant positive impact on this element of SA objective 4.4 and in turn a minor positive effect on SA objective 4.10 (Conservation and sustainable use of land). All other sites were identified as using greenfield land and therefore a negligible effect was recorded with respect to the use of brownfield land and a minor negative effect on SA objective 4.10 (Conservation and sustainable use of land).
- 6.350 Four sites (**Wel2**, **Wel15**, **WGr2** and **WGr3**) were identified in the WHBC Green Belt Review as having a significant effect in relation to maintaining the existing settlement pattern (SA objective 4.4) and therefore likely to have a significant negative effect. Wel1 and OMH7 were considered to have minor negative and negligible effects respectively. With regards to protecting and enhancing open space (SA objective 4.4), all of the sites were considered to have a negligible impact.
- 6.351 Similar to the allocated sites in the northern villages, the reasonable alternatives were considered to have a minor or significant (uncertain) impact on biodiversity (SA Objective 4.6). All reasonable alternatives in Welwyn (**Wel1**, **Wel2** and **Wel15**) were considered to have a significant negative effect upon the conservation of heritage and cultural assets (SA Objective 4.5). For the remaining sites, WGr2 was identified as having a minor negative effect, while sites WGr3 and OMH7 were considered to have a negligible effect for SA objective 4.5 (Conservation of heritage and cultural assets).
- 6.352 All reasonable alternatives in Welwyn are located within the inner or outer impact zones of a source protection zone, resulting in a potential minor negative effect on water pollution (SA objective 4.8). All other sites scored a negligible effect.

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

- 6.353 With the exception of WGr2 (reasonable alternative site for employment) **all reasonable alternative sites** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6). **WGr2** would have contributed to at least 5% (11,250 sq m) of the required net increase of 138,000 sq m of employment space between 2013 to 2032 according to the Economy Study Update (2015) and therefore was considered to have an (uncertain) significant positive effect on ensuring the supply, location and quality of business and employment sites (SA objective 6.1). This site would help to sustain the Woolmer Green economy and was therefore considered to have an (uncertain) minor positive effect on the rural economy and small businesses (SA objective 6.4).
- 6.354 None of the sites were considered to have significant or minor effects on or the sterilisation of mineral resources (SA objective 6.5). One site (**WGr2**) was considered to have a minor positive effect on sustaining rural communities and their economies (SA Objective 6.4).

Summary of SA findings for site allocations in the villages north of Welwyn Garden City

- 6.355 The likely sustainability effects of the site allocations in the villages north of Welwyn Garden City are generally consistent and positive across all sites with regards to the economic and social objectives. The effects for the environmental objectives are less consistent and generally less positive. For biodiversity the majority of the sites were considered to have minor or significant negative impacts, although for heritage, the majority of impacts, were thought to be negligible. The sites located towards the west of the group were considered to have a greater potential to impact on water pollution as they are located within an inner or outer impact groundwater source protection zone (with potential risk of contamination of groundwater resources from certain activities).
- 6.356 When comparing the allocated sites with the reasonable alternatives, for many SA objectives there is often not a marked difference between the two sets of sites, but for a few SA objectives some notable differences were identified.
- 6.357 Two of the allocated sites at Oaklands and Mardley Heath were considered to have the potential to have significant adverse effects on landscape character, whereas none of the reasonable alternative allocations were considered to have significant negative effects on this component of SA objective 4.4. Conversely, three of the five reasonable alternatives were considered to have potentially significant negative effects on local distinctiveness (also a component of SA objective 4.4), whereas only one allocated site did, being HS18 (Wel11). Two of the reasonable alternative sites were considered likely to have a significant effect on heritage (SA objective 4.5), whereas none of the allocated sites would. In contrast, three of the allocated sites have the potential before mitigation to have a significant effect on biodiversity (SA objective 4.6) due to their proximity to designated wildlife sites, whereas only one reasonable alternative was considered to have a potential significant effect.
- 6.358 Minor and significant negative effects identified in the appraisal for the allocated sites will require mitigation through adherence to relevant strategic and development management policies, including SADM 16 Ecology and Landscape, SP 11 Protection and Enhancement of Critical Environmental Assets, SP 12 Strategic Green Infrastructure, SADM 15 Heritage, and SADM 16 Ecology and Landscape, and site specific policies including SADM 27, SADM 28 and SADM 29.

Table 6.19: SA scores for the allocated and reasonable alternative sites in and around the villages north of Welwyn Garden City

SA Objectives		Likely Effects												
		Allocated Sites						Reasonable Alternatives						
		Welwyn			Woolmer Green	Oaklands and Mardley Heath			Welwyn			Woolmer Green		Oaklands and Mardley Heath
		HS20 (Wel3)	HS19 (Wel4)	HS18 (Wel11)	HS15 (WGr1)	HS17 (OMH5)	HS16 (OMH8)	HS32 (GTLAA04)	Wel1	Wel2	Wel15	WGr2	WGr3	OMH7
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?		+	+	+	+	+	+	+	+	+	+	+	+	
2.2 Ensure there is no increase in flood risk to people or property, taking into account climate change?		0	0	0	0	0	0	0	0	0	0	0	0	
4.2 Significantly reduce greenhouse gas emissions from transport?	Proximity to employment and services	+	+	+	++	+	0	0	+	+	+	++	++	+
	Proximity to transport services	0	++	++	++	++	++	++	++	++	++	++	++	0
4.3 Avoid and reduce air pollution	Proximity to employment and services	+	+	+	++	+	0	0	+	+	+	N/A	++	+

SA Objectives		Likely Effects												
		Allocated Sites							Reasonable Alternatives					
		Welwyn			Woolmer Green	Oaklands and Mardley Heath			Welwyn			Woolmer Green	Oaklands and Mardley Heath	
		HS20 (Wel3)	HS19 (Wel4)	HS18 (Wel11)	HS15 (WGr1)	HS17 (OMH5)	HS16 (OMH8)	HS32 (GTLAA04)	Wel1	Wel2	Wel15	WGr2	WGr3	OMH7
	Proximity to transport services	0	++	++	++	++	++	++	++	++	++	++	++	0
4.4 Protect and enhance open space and landscape character, retaining local distinctiveness?	Open Space	0	0	0	0	0	0	0	0	0	0	0	0	0
	Landscape character	-?	-?	-?	-?	--?	--?	?	-?	-?	-?	-?	-?	?
	Previously Developed Land	+++?	+++?	0	0	0	+++?	+++?	0	0	0	0	0	+++?
	Retaining local distinctiveness	-	-	--	-	-	0	-	--	--	--	--	--	0
4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?	-?	-?	0	--?	0	0	0	--?	--?	--?	-?	0	0	
4.6 Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?	-?	-?	--?	-?	--?	-?	--?	--?	--?	--?	-?	0	-?	

SA Objectives		Likely Effects												
		Allocated Sites						Reasonable Alternatives						
		Welwyn			Woolmer Green	Oaklands and Mardley Heath			Welwyn			Woolmer Green	Oaklands and Mardley Heath	
		HS20 (Wel3)	HS19 (Wel4)	HS18 (Wel11)	HS15 (WGr1)	HS17 (OMH5)	HS16 (OMH8)	HS32 (GTLAA04)	Wel1	Wel2	Wel15	WGr2	WGr3	OMH7
4.8 Avoid water pollution		-?	-?	-?	0	0	0	0	-?	-?	-?	0	0	0
4.10 Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land		+	+	-	-	0	+	+	-	-	-	-	-	+
5.1 Provide the right amount, type and tenure of housing to meet identified local needs?	Amount of housing	0	0	0	+	0	0	++	+	0	0	N/A	0	0
	Affordable housing	0	++	++	++	++	++	0	++	++	++	N/A	++	++
	Dwellings for older people	++	++	++	++	++	++	0	++	++	++	N/A	++	++
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	0	0	0	0	0	0	0	0	0	++?	0	0

SA Objectives	Likely Effects												
	Allocated Sites							Reasonable Alternatives					
	Welwyn			Woolmer Green	Oaklands and Mardley Heath			Welwyn			Woolmer Green	Oaklands and Mardley Heath	
	HS20 (Wel3)	HS19 (Wel4)	HS18 (Wel11)	HS15 (WGr1)	HS17 (OMH5)	HS16 (OMH8)	HS32 (GTLAA04)	Wel1	Wel2	Wel15	WGr2	WGr3	OMH7
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?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	0	0	0	0	0	0	0	0	0	0	0	0	0
6.4 Sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+	N/A	N/A
6.5 Avoid sterilisation of mineral resources	0	0	0	0	0	0	0	0	0	0	0	0	0
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	N/A	+++	+++

The Villages South of Hatfield

- 6.359 Issues and Options alternatives PG39, PG40, PG45, 41 relate to development of the policies in this section of the Proposed Submission Local Plan.
- Option PG39: Possible broad directions of growth - East of Welham Green
 - Option PG40: Possible broad directions of growth - West and south of Brookmans Park
 - Option PG45: Possible broad directions of growth - East of Little Heath
 - Option PG41 Possible broad locations of growth - West and south-west of Cuffley
- 6.360 A number of potential village allocation sites were appraised at both the Emerging Core Strategy stage (2012) and the Local Plan Consultation Document stage (2015), as reported upon in Chapter 5 of this SA Report.
- 6.361 At the Proposed Submission Local Plan stage, twenty-five site options were considered at the villages south of Hatfield (see **Figures 6.6 – 6.9**) and of these thirteen site options for strategic mixed use, residential development and Gypsy Traveller sites have been allocated in the Proposed Submission Local Plan. These are located in Welham Green, Cuffley, Brookmans Park and Little Heath. Combined these site allocations should contribute up to 788 new homes in the Borough, plus 12 Gypsy & Travellers pitches, as shown in **Table 6.20**.
- 6.362 **Policy SADM 30** supports development of the allocated sites at Welham Green, **Policy SADM 31** supports development of the allocated sites at Brookmans Park, **Policy SADM 32** supports development of the allocated sites at Little Heath, and **Policy SADM 33** supports development of the allocated sites at Welwyn. **Policy SP 23** deals specifically with the Marshmoor Policy Area.

Table 6.20: Site allocations at the villages south of Hatfield

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
SDS7	WeG4b	Marshmoor, Welham Green	80	40,500 sqm
HS21	BrP13	Land west of Golf Club Road, Brookmans Park	14	N/A
HS22	BrP4	Land west of Brookmans Park Railway Station, Brookmans Park	250	N/A
HS23	BrP14	Land east of Golf Club Road, Brookmans Park	10	N/A
HS24	BrP7	Land south of Hawkshead Road, Little Heath	100	N/A
HS25	LHe1	Land north of Hawkshead Road, Little Heath	35	N/A
HS26	No02	36 The Ridgeway and land to the rear, Cuffley	8	N/A
HS27	Cuf1	Land at the Meadway, Cuffley	30	N/A
HS28	Cuf6	Land south of Northaw Road East, Cuffley	108	N/A
HS29	Cuf12	Land north of Northaw Road, Cuffley	73	N/A
HS30	Cuf7	Wells Farm, Cuffley	75	N/A
HS31	No10	Land West of St Martin de Porres Catholic Church, Cuffley	5	N/A

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
HS35	GTLAA01	Foxes Lane, Welham Green	12	N/A

6.363 The summary of the assessment of these sites begins with a review of the strategic allocation at WeG4b (SDS7) in Welham Green before combining the review of the summary of results across the southern villages.

Policy SP 23: Marshmoor Policy Area – Strategic Allocation WeG4b (SDS7)

6.364 WeG4b is a strategic site allocated for mixed use residential and employment uses, which will deliver approximately 4.1ha of Class B1 employment floor space and around 80 new homes. **Policy SP 23** supports the site's development in relation to 'Access and Movement', 'Heritage, Landscape, Ecology and Design' and 'Flood Risk and Drainage'. This policy also supports proposals set out in a Supplementary Planning Document for the Marshmoor Policy Area which is currently being prepared.

SA findings - social objectives (1.1, 1.2, 5.1)

6.365 This site is considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as it is in reasonable walking distance of a range of services such as GP surgeries, convenience stores, post offices, open space etc. Although this site scores positively, Policy SP 23 also seeks to improve accessibility and movement for pedestrians, wheelchair users and cyclists, which could encourage a more healthy and active lifestyle. It also seeks to define primary vehicular access to the site, which could ensure that the movement of heavy vehicles is sited away from homes and community facilities, which could improve local air quality, while also improving pedestrian safety.

6.366 In relation to SA objective 5.1 (the provision of affordable housing and dwellings for older people), this site is considered to have a significant positive effect on affordable housing and the supply of homes for older people. As this site is only expected to deliver between 1-5% of the Borough's Objectively Assessed Housing Need, it was considered to have a negligible effect with respect to meeting the housing need of the Borough.

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

6.367 Due to its proximity to employment and services and transport services, this site was considered to have a significant positive effect on both SA objective 4.2 (reduce greenhouse gas emissions from transport) and 4.3 (avoid and reduce air pollution). As well as the improvements to accessibility and movement mentioned above, Policy SP 23 will also help to reinforce these positive effects by ensuring that there are improvements to public transport facilities.

6.368 No significant negative or positive effects were identified for open space and landscape character, previously developed land or retaining local distinctiveness (SA objective 4.4). This site was identified as mixed greenfield and previously developed land and therefore scored a mixed minor positive and minor negative effect in relation to SA objective 4.10 (Conservation and sustainable use of land). However, the site was considered to have minor negative effects upon the landscape character and local distinctiveness according to the Landscape Sensitivity and Capacity Study. In the section on 'Heritage, Landscape, Ecology and Design' in Policy SP 23 recommendations are made to mitigate and improve the general appearance of a countryside setting, and maintain the perceived separation between the Marshmoor Area and Hatfield.

6.369 Marshmoor Lane Grassland Strip Local Wildlife Site is within the boundary of the site and Millward's Park Local Wildlife Site is within 250m of the site, therefore a significant (uncertain) negative effect was identified in relation to biodiversity (SA objective 4.6). Policy SP 23 recommends mitigation against this through the provision of appropriate protection, and where possible enhancement of these assets.

6.370 A mixed significant negative effect and minor positive effect were considered likely in relation to heritage assets (SA objective 4.5). The site is a substantial site and is opposite Hatfield House Registered Park and Garden and therefore could have direct significant negative effect, but the site may also give rise to opportunities to improve the setting of the Registered Park. Mitigation is recommended in Policy SP23, which states that the '*siting, layout, scale and overall design of*

development should be based on a Heritage Impact Assessment'. In addition, the section under 'Heritage, Landscape, Ecology and Design' also includes recommends other mitigation including significant planting of tree and shrub species.

- 6.371 In relation to flood risk to people or property (SA objective 2.2), WeG4b was the only site identified as having a proportion within a flood risk zone and therefore scored a minor negative effect. All other sites are likely to have a negligible effect because they are outside flood zones 2 or 3. The section on 'Flood Risk and Drainage' in Policy SP 23 includes various requirements including a Flood Risk Assessment and SuDs to manage surface water runoff, which could help prevent any future development from increasing flood risk on the site and elsewhere. Negligible effects were identified for the avoidance of water pollution (SA objective 4.8). Policy SP 23 requires the need to establish whether wastewater infrastructure upgrades are required and the feasibility and deliverability of solutions to support development in SDS7 and the wider Marshmoor Area.

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

- 6.372 WeG4b includes significant employment uses and therefore is considered to have a significant positive effect on the supply and location of employment land (SA objective 6.1). Significant but an uncertain positive effect was also identified in relation to access to education (SA objective 6.6) as the site is in reasonable walking distance of an educational establishment which has been assumed to have existing or future capacity to accommodate more students. The employment uses on the site could provide opportunities for training and skills development but this is uncertain.
- 6.373 WeG4b is also considered to have a minor positive effect on encouraging economic investment (SA objective 6.2) and sustaining the rural southern village economies (SA objective 6.4). All other scores identified were either negligible or non-applicable to the assessment of this site.
- 6.374 Negligible effects were identified for the sterilisation of mineral resources (SA objective 6.5).

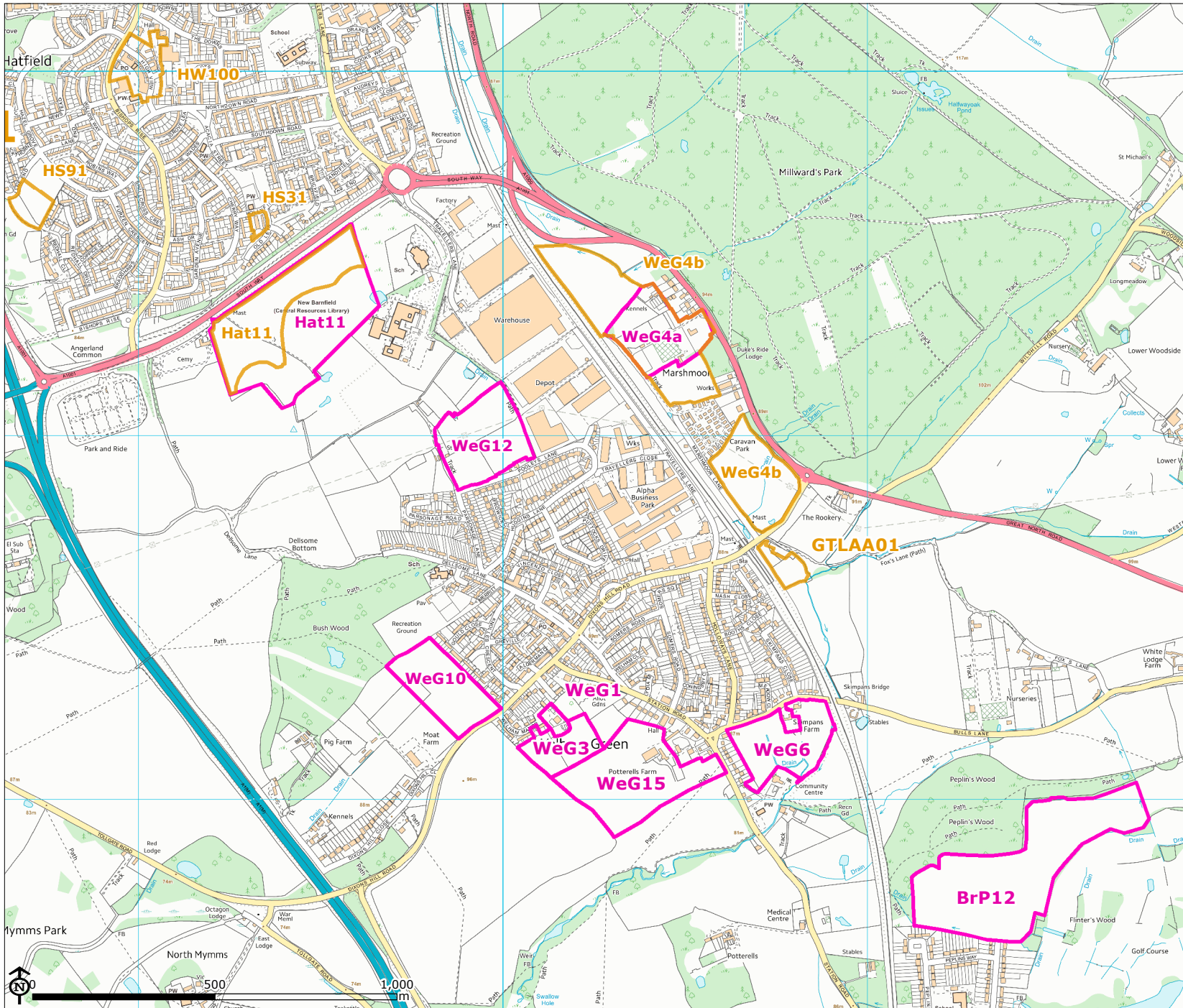
Other sites in the villages south of Hatfield

- 6.375 There are twelve other sites allocated across the southern villages. In Cuffley there were ten sites considered and of these six were allocated comprising HS29 (Cuf 12), HS30 (Cuf7), HS31 (No10), HS28 (Cuf6), HS27 (Cuf1) and HS26 (No02) and the other three (Cuf4, Cuf5 and Cuf10) were identified as alternative sites. **Policy SADM 33** provides specific recommendations relating to the development of the allocated sites in Cuffley. In Brookmans Park six sites were considered and of these three were allocated including HS21 (BrP13), HS23 (BrP14) and HS23 (BrP4) under **Policy SADM 31**, while the other three (BrP1, BrP6 and BrP12) were identified as reasonable alternatives.
- 6.376 In Little Heath three sites were considered and two were allocated for development HS25 (LHe1) and HS24 (BrP7), and BrP7 (with an increased housing provision) was identified as a reasonable alternative. **Policy SADM 32** provides specific recommendations relating to the development of the allocated sites in Little Heath. In Welham Green a total of nine sites were considered and of these two were allocated including HS35 (GTLAA01) a Gypsy Traveller site and a strategic site SDS7 (WeG4b), discussed above in paragraphs 1.50-1.57. The other sites (WeG1, WeG3, WeG6, WeG4a WeG10, WeG12 and WeG15) were identified as reasonable alternatives. **Policy SADM 30** provides specific recommendations relating to the development of HS35 (GTLAA01) for 12 Gypsy and Traveller pitches as an extension to an existing site.

Figure 6.6

Allocated and Reasonable Alternative Sites in and around Welham Green

- Welwyn Hatfield Borough
- Allocated Site
- Reasonable Alternative Site



Source: Ordnance Survey, WHBC

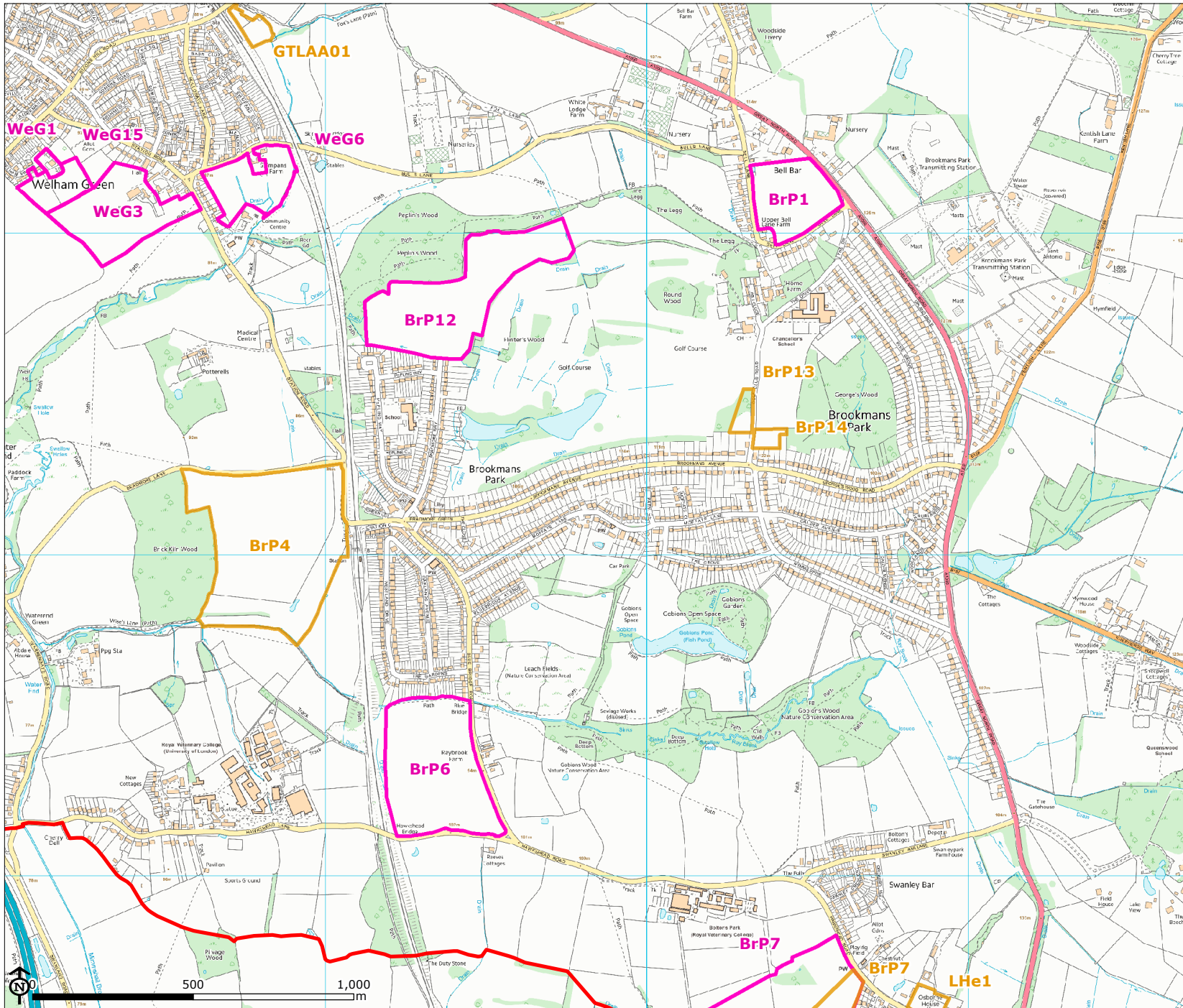
Map Scale @ A4: 1:14,930



Figure 6.7

Allocated and Reasonable Alternative Sites in and around Brookmans Park

- Welwyn Hatfield Borough
- Allocated Site
- Reasonable Alternative Site






Source: Ordnance Survey, WHBC

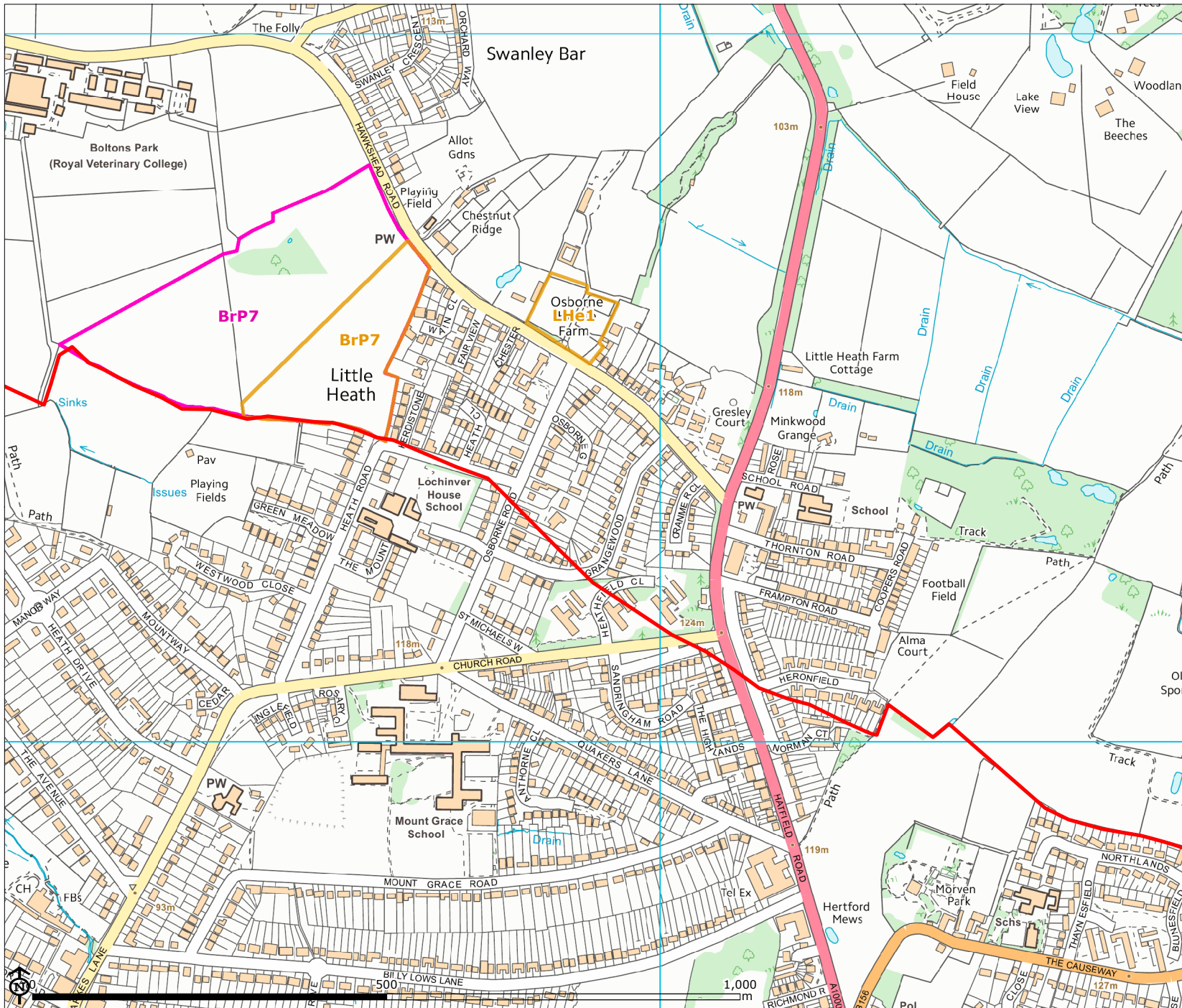
Map Scale @ A4: 1:16,930



Figure 6.8

**Allocated and Reasonable
Alternative Sites in and
around Little Heath**

-  Welwyn Hatfield Borough
-  Allocated Site
-  Reasonable Alternative Site






Source: Ordnance Survey, WHBC

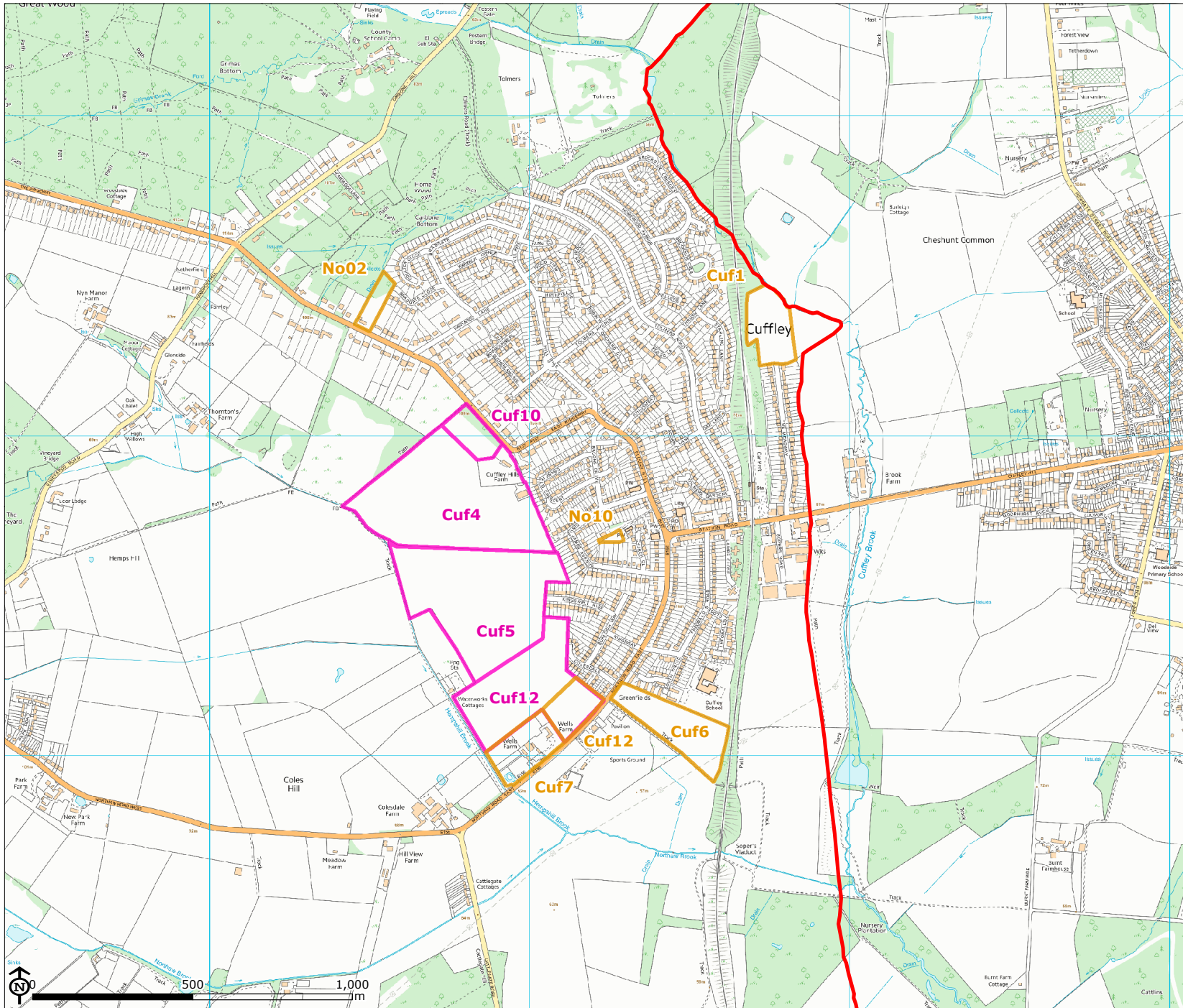
Map Scale @ A4: 1:7,680



Figure 6.9

**Allocated and Reasonable
Alternative Sites in and
around Cuffley**

-  Welwyn Hatfield Borough
-  Allocated Site
-  Reasonable Alternative Site



Source: Ordnance Survey, WHBC

Map Scale @ A4: 1:17,000



Policy SADM 30: Welham Green

Policy SADM 31: Brookmans Park

Policy SADM 32: Little Heath

Policy SADM 33: Cuffley

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.377 All sites were considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as they are all in reasonable walking distance of a range of services. Although these results were positive, Policy SADM 33 recommends that applications demonstrate that an accepted level of noise can be achieved for future residents at HS31 (No10), HS27 (Cuf1) and HS28 (Cuf6), while Policy SADM 31 also recommends mitigation against noise pollution and road safety improvements at HS23 (BrP4).
- 6.378 With the exception of HS23 (BrP14) and HS26 (No02), which scored a negligible effects, **all sites** were considered to have a significant positive effect on SA objective 5.1 (in relation to the provision of affordable housing and dwellings for older people. The Gypsy and Traveller site HS35 (GTLAA01), is not expected to contribute to affordable housing need. The majority of the sites are likely to have a negligible effect on the amount of housing (as they would each provide less than 1% of the Borough's housing target). Policy SADM 33 restricts the capacity of development at No10 (HS31) to 5 dwellings in the interests of highway safety. However, **HS35 (GTLAA01)** is likely to have a significant positive effect on this part of SA objective 5.1 as it has the potential to provide at least 5% of the Borough's need for Gypsy and Traveller pitches. HS23 (BrP4) and HS24 (BrP7) will deliver between 1 and 5% of the Borough's Housing Need and was therefore considered to have a minor positive effect.

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

- 6.379 Due to their proximity to employment and services and public transport services all of the **Welham Green, Cuffley** and **Little Heath** sites are considered likely to have a significant positive effect on both SA objective 4.2 (reduce greenhouse gas emissions from transport) and SA objective 4.3 (avoid and reduce air pollution). Although these effects are positive, Policy SADM 33 recommends consideration to a number of access and movement strategies at HS29 (Cuf12), which include pedestrian crossing facilities. The **Brookmans Park sites** are all likely to have a significant positive effect in relation to their proximity to transport and a minor positive or negligible effect in relation to the proximity to employment and services.
- 6.380 With the exception of HS21 (BrP13), all sites are considered likely to have a negligible effect on the open space component of SA objective 4.4. **HS21 (BrP13)** was considered to have a significant negative effect owing to site's location within Brookmans Park Golf Club (although it should be noted that the site is fenced off from the rest of the golf club). With regards to the landscape character component of SA objective 4.4, the majority of sites are likely to have minor negative effects although sites **HS29 (Cuf 12)** and **HS23 (BrP4)** are considered to have significant negative effects. The majority of the sites are assessed as being likely to have a minor or significant negative impact on retaining local distinctiveness (also SA objective 4.4) with three sites at **HS29 (Cuf 12), HS23 (BrP4) and HS24 (BrP7)** likely to have a significant negative effect. To mitigate against these effects, policy SADM 33 recommends that sites HS29 (Cuf12) and HS30 (Cuf7) come forward together in order to form a logical and defensible Green Belt boundary. Mitigation is also supported in policies SADM 31 in relation to sites HS22 (BrP4) and HS24 (BrP7), where the retention of gaps and enhancement of landscape buffers is recommended. Although the effect was assessed as uncertain, Policy SADM 33 recommends the protection of the semi-rural context and character at HS26 (No02).
- 6.381 **HS30 (Cuf7)** and **HS31 (No10)** are the only sites located on previously developed land and therefore considered to have a significant positive effect on that element of SA objective 4.4, while HS24 (LHe1) was the only site identified as being on mixed greenfield / previously developed site and therefore considered to have a minor positive effect. All other sites were considered to have negligible effects. Policy SADM 33 recommends consideration to the potential of contaminated land at HS27 (Cuf1) and HS31 (No10).

- 6.382 In relation to protecting and enhancing biodiversity the majority of sites have the potential to have a significant negative effect due to their close proximity to designated nature conservation sites, specifically in relation to sites **HS27 (Cuf1)**, **HS26 (No02)**, **HS21 (BrP13)**, **HS23 (BrP14)**, **HS23 (BrP4)** and **HS35 (GTLAA01)**. Sites HS31 (No10) and HS24 (BrP7) are considered to have a minor negative impact on biodiversity. The remaining sites, HS29 (Cuf 12), HS30 (Cuf7), HS28 (Cuf6) and HS24 (BrP7) are likely to have an uncertain effect on this SA objective as they are identified as being greenfield land. To address these negative and uncertain effects policies SADM 30- 35 covering villages South of Hatfield recommend various mitigation proposals including the provision of green infrastructure corridors to support ecology (SADM 30 and 33), woodland management proposals (SADM 32) and consultation with Natural England on the protection and licencing requirements for protected species (SADM 33).
- 6.383 Although the majority of the sites lie within 250m and 1km of a Listed Building, it was considered that barriers such as large road networks e.g. the A1(M) or railway lines and existing settlements would reduce their impact upon the heritage assets and their settings. Therefore, all sites in Cuffley, Brookmans Park and Welham Green (excluding the strategic allocation) were considered to have a negligible effect for SA objective 4.5 (Conservation of heritage and cultural assets). **HS25 (LHe1)** is adjacent to a Listed Building (Osborne House) on the opposite side of Hawkshead Road and, therefore, this site was considered to have a significant negative effect on the setting of this heritage asset. In response to this, Policy SADM 32 recommends that proposals give consideration to retaining and enhancing the landscape buffer along Hawkshead Road. HS24 (BrP7) was found to be between 250m and 1km of Gobions (Gubbins) Registered Park and Gardens and it is expected that there will be some intervisibility between the two sites, therefore this site was assessed as having a minor negative effect upon this SA objective. Policy SADM 32 recommends the use of a green buffer to help mitigate heritage impacts on the Historic Park and Garden and the Grade II* Listed Folly to mitigate against the negative effect at HS24 (BrP7). Policy SADM 33 recommends further investigation of Area of Archaeological Significance (AAS) at sites HS30 (Cuf7) and HS29 (Cuf12).
- 6.384 In relation to the increase in flood risk to people or property (SA objective 2.2) all sites are likely to have a negligible effect with the exception of HS30 (CUF7) which contained a significant proportion of land located within flood zones 2 or 3 and is therefore likely to have a minor negative effect. Potential mitigation has been identified in Policy SADM 33, which recommends that proposals include a flood risk assessment and the incorporation of SuDs to take specific account of topography of the area. At other sites Policy SADM 30 and Policy SADM 33 recommend a flood risk assessment on sites HS35 (GTLAA01), HS28 (Cuf6) and HS29 (Cuf12), while Policy SADM 3 requires consideration for the use of SuDs at HS24 (BrP7).
- 6.385 All sites in the villages to the south of Hatfield were identified as having a negligible effect on the avoidance of water pollution (SA objective 4.8). Policy SADM 30 recommends upgrades to the wastewater infrastructure at HS35 (GTLAA01).
- 6.386 All but two sites were considered to have a minor negative effect on the conservation and sustainable use of land (SA objective 4.10). HS31 (No10) has been identified as having a (uncertain) minor positive effect and HS25 (LHe1) was considered to have a mixed minor negative and minor positive effect. This is because although it was identified as a previously developed site, a significant proportion of the site has been designated as Grade 3 agricultural land.
- SA findings - economic objectives (6.1, 6.2, 6.3, 6.4, 6.5, 6.6)*
- 6.387 **All sites** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6) as they are in reasonable walking distance of an educational establishment which are assumed to have existing or future capacity to accommodate more students.
- 6.388 None of the sites are considered to have significant or minor negative effects on or the sterilisation of mineral resources (SA objective 6.5).
- 6.389 All other effects assessed for the economic objectives were either negligible or non-applicable to the assessment of these sites.

Reasonable alternatives

6.390 Fifteen reasonable alternative sites for the villages south of Hatfield were subject to SA at the Proposed Submission Local Plan stage, as shown in **Table 6.21**.

Table 6.21: Reasonable alternative sites for the villages south of Hatfield

Site ref	HELAA ref	Site name	Housing numbers	Employment floorspace
N/A	WeG1	Welham Manor house, Welham Manor, Welham Green	10	N/A
N/A	WeG3	Land south of Welham Manor, Welham Green	45	N/A
N/A	WeG6	Skimpans Farm, Bulls Lane, Welham Green	73	N/A
N/A	WeG10	Land north of Dixons Hill Road, Welham Green	120	N/A
N/A	WeG12	Land north of Pooley's Lane, Welham Green	59	N/A
N/A	WeG15	Potterells Farm, Station Road, Welham Green	140	N/A
N/A	WeG4a	Marshmoor	120	N/A
N/A	BrP1	Upper Bell Lane Farm, Bell Bear, Brookmans Park	100	N/A
N/A	BrP6	Land west of Bluebridge Road, Brookmans Park	234	N/A
N/A	BrP12	Peplins Wood, Peplins Way, Brookmans Park	110	N/A
N/A	BrP7	Land south of Hawkshead Road, Little Heath	150	N/A
N/A	Cuf4	Cuffley Hills Farm, The Ridgeway, Cuffley	220	N/A
N/A	Cuf5	Land north of Northaw Road East, Cuffley	440	N/A
N/A	Cuf10	Land adjacent to 1 The Ridgeway, Cuffley	33	N/A
N/A	Cuf12	Land at Northaw Road East, Cuffley	180	N/A

SA findings - social objectives (1.1, 1.2, 5.1)

6.391 Similar to the allocated sites, all reasonable alternative sites were considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) and the provision of affordable housing and dwellings for older people. However, the majority of the reasonable alternative sites are likely to have a negligible effect on the amount of housing (as they would each provide less than 1% of the Borough's housing target). However Cuf4, Cuf5, Cuf12, BrP6, Brp7 and WeG15 are likely to have a minor positive effect on the amount of housing to be delivered in the Borough.

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

6.392 Due to their proximity to employment and services and public transport services all of the Welham Green, Little Heath and Cuffley reasonable alternative sites were considered likely to have a significant positive effect on both SA objective 4.2 (reduce greenhouse gas emissions from transport) and 4.3 (avoid and reduce air pollution). The Brookmans Park sites are likely to have a negligible effect in relation to the proximity to employment and services.

- 6.393 All of the sites were considered likely to have a negligible effect on open space within SA objective 4.4. With regards to landscape character (also SA objective 4.4), the majority of sites were considered to have either a minor or a significant negative effect with sites **Cuf4, Cuf5, Cuf10, Cuf12** and **BRP12** considered to have significant negative effects. **WeG1** was the only site located on previously developed land and therefore considered to have a significant positive effect on that element of SA objective 4.4, while WeG15 is partly previously developed land and therefore considered to have a minor positive effect. The majority of the sites were assessed as being likely to have a minor or significant negative impact on retaining local distinctiveness with seven sites (**Cuf4, Cuf5, Cuf10, Cuf12, BrP1, BrP6 BrP12, WeG6** and **BrP7**) likely to have a significant negative effect, taking into account the findings of the Green Belt Review. WeG1 was the only site considered to have negligible effects according.
- 6.394 Similar to the allocated sites, the majority to the reasonable alternative sites have the potential to have a significant negative effect on biodiversity, due to the close proximity of designated nature conservation sites. Eleven sites (**Cuf4, Cuf5, Cuf10, BrP1, BrP6 BrP12, WeG4a, WeG6, WeG10, WeG12 and WeG15**) could have significant negative effects.
- 6.395 Over half of the sites from the villages south of Hatfield are expected to have minor or significant (uncertain) negative effects on heritage assets (SA objective 4.5), with **BrP1, BrP6** and **WeG6** expected to have significant negative effects. **WeG4a** was considered to have a mixed significant neagative and minor positive effect, while BrP7 was considered to have a mixed minor negative and minor positive effect. The rest of the sites scored a minor negative or negligible effect due to barriers limiting the impacts of development upon the setting of nearby heritage assets.
- 6.396 In relation to flood risk to people or property (SA objective 2.2) all sites are likely to have a negligible effect with the exception of WeG6 which contained a significant proportion of land located within flood zones 2 or 3 and therefore likely to have a minor negative effect. Over half of the reasonable alternative sites were considered to have a negligible effect on the avoidance of water pollution (SA objective 4.8) while the half including BrP6, BrP12, WeG1, WeG3 WeG6 and WeG15 are located within either an inner or outer impact zone (of the groundwater source protection zone) and are likely to have a minor (uncertain) negative effect.
- 6.397 All but two sites (WeG1 and WeG4a) were considered to have a minor negative effect on the conservation and sustainable use of land (SA objective 4.10). WeG1 was identified as previously developed land and likely to have a minor positive effect on this SA objective. WeG4a is spread across urban, non-agricultural and grade 3 agricultural according to the agricultural land classification, but it is a mixture of previously developed land and greenfield land and therefore considered to have a minor positive and minor negative effect.

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

- 6.398 Similar to allocated sites, **all reasonable alternatives** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6) as they are in reasonable walking distance of an educational establishment which has been assumed to have existing or future capacity to accommodate more students. All other effects assessed for the economic objectives were either negligible or non-applicable to the assessment of these sites.
- 6.399 None of the sites were considered to have significant or minor effects on or the sterilisation of mineral resources (SA objective 6.5).

Summary of SA findings for site allocations in the villages south of Hatfield

- 6.400 The likely sustainability effects of the allocated sites at the villages south of Hatfield sites are generally consistent and positive across all sites with regards to the economic and social objectives. The effects for the environmental objectives are less consistent and generally less positive for sites located in Brookmans Park, Cuffley and Little Heath. The majority of sites are likely to have a negligible or minor impact on heritage assets, although HS24 (LHe1) and SDS7 (WeG4b) have the potential for significant effects.
- 6.401 A number of the allocated sites could potentially have significant negative effects on biodiversity, specifically HS27 (Cuf1), HS26 (No02), HS21 (BrP13), HS23 (BrP14), HS23 (BrP4) and HS35 (GTLAA01). HS29 (Cuf12) and HS22 (BrP4) are both anticipated to have the potential for significant negative effects on landscape character and local distinctiveness with respect to the

Green Belt. HS25 (BrP7) also has the potential for significant negative effects on local distinctiveness.

- 6.402 Mitigation for the negative effects identified is set out in the site-specific considerations supporting Policies SADM 30-35 as well as relevant strategic and development management policies, especially SADM 16 Ecology and Landscape, SP11 Protection and Enhancement of Critical Environmental Assets, SP12 Strategic Green Infrastructure, SADM 15 Heritage, and SADM 16 Ecology and Landscape.
- 6.403 On the whole, the reasonable alternative sites did not perform more strongly than the allocated sites against the SA objectives. WeG1 and WeG3, both being sites near Welham Manor in Welham Green, were the only sites not to have significant effects recorded against them for one or more of the SA objectives relating to landscape, heritage and biodiversity. Several reasonable alternative sites performed markedly more poorly than the majority of the allocated sites.

Table 6.22: SA scores for the allocated sites in and around the villages south of Hatfield

SA Objectives		Likely Effects												
		Allocated Sites												
		Cuffley						Brookmans Park			Little Heath		Welham Green	
		HS29 (Cuf12)	HS30 (Cuf7)	HS31 (No10)	HS28 (Cuf6)	HS27 (Cuf1)	HS26 (No02)	HS21 (BrP13)	HS23 (BrP14)	HS22 (BrP4)	HS24 (LHe1)	HS25 (BrP7)	HS35 (GTLAA01)	SDS7 (WeG4b)
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?		+	+	+	+	+	+	+	+	+	+	+	+	
2.2 Ensure there is no increase in flood risk to people or property, taking into account climate change?		0	-	0	0	0	0	0	0	0	0	0	-	
4.2 Significantly reduce greenhouse gas emissions from transport?	Proximity to employment and services	++	++	++	++	++	++	0	0	+	++	++	++	++
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++
4.3 Avoid and reduce air pollution	Proximity to employment and services	++	++	++	++	++	++	0	0	+	++	++	++	++
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++

SA Objectives		Likely Effects												
		Allocated Sites												
		Cuffley						Brookmans Park			Little Heath		Welham Green	
		HS29 (Cuf12)	HS30 (Cuf7)	HS31 (No10)	HS28 (Cuf6)	HS27 (Cuf1)	HS26 (No02)	HS21 (BrP13)	HS23 (BrP14)	HS22 (BrP4)	HS24 (LHe1)	HS25 (BrP7)	HS35 (GTAA01)	SDS7 (WeG4b)
4.4 Protect and enhance open space and landscape character, retaining local distinctiveness?	Open Space	0	0	0	0	0	0	--?	0	0	0	0	0	0
	Landscape character	--?	-?	?	-?	-?	?	-?	-?	--?	-?	-?	-?	-?
	Previously Developed Land	0	++?	++?	0	0	0	0	0	0	+	0	0	+
	Retaining local distinctiveness	--	-	0	0	-	0	-	-	--	0	--	-	-
4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?		0	0	0	0	0	0	0	0	0	--?	--?	-?	--?/+?
4.6 Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?		?	?	-?	?	--?	--?	--?	--?	--?	-?	?	--?	--
4.8 Avoid water pollution		0	0	0	0	0	0	0	0	-?	0	0	0	0

SA Objectives		Likely Effects												
		Allocated Sites												
		Cuffley						Brookmans Park			Little Heath		Welham Green	
		HS29 (Cuf12)	HS30 (Cuf7)	HS31 (No10)	HS28 (Cuf6)	HS27 (Cuf1)	HS26 (No02)	HS21 (BrP13)	HS23 (BrP14)	HS22 (BrP4)	HS24 (LHe1)	HS25 (BrP7)	HS35 (GTAA01)	SDS7 (WeG4b)
4.10 Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land		-	-	+	-	-	-	-	-	-	-/+	-	-	+/-
5.1 Provide the right amount, type and tenure of housing to meet identified local needs?	Amount of housing	0	0	0	0	0	0	0	0	+	0	0	++	0
	Affordable housing	++	++	0	++	++	0	++	0	++	++	++	0	++
	Dwellings for older people	++	++	++	++	++	++	++	++	++	++	++	0	++
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	0	0	0	0	0	0	0	0	0	0	0	++
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?		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	+

SA Objectives	Likely Effects												
	Allocated Sites												
	Cuffley						Brookmans Park			Little Heath		Welham Green	
	HS29 (Cuf12)	HS30 (Cuf7)	HS31 (No10)	HS28 (Cuf6)	HS27 (Cuf1)	HS26 (No02)	HS21 (BrP13)	HS23 (BrP14)	HS22 (BrP4)	HS24 (LHe1)	HS25 (BrP7)	HS35 (GTAA01)	SDS7 (WeG4b)
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	0	0	0	0	0	0	0	0	0	0	0	0	++
6.4 Sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	++?
6.5 Avoid sterilisation of mineral resources	0	0	0	0	0	0	0	0	0	0	0	0	0
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?	+++?

Table 6.23: SA scores for the reasonable alternative sites in and around the villages south of Hatfield

SA Objectives		Likely Effects													
		Reasonable Alternatives													
		Cuffley				Brookmans Park				Welham Green					Little Heath
		Cuf4	Cuf5	Cuf10	Cuf 12	BrP1	BrP6	BrP12	WeG1	WeG3	WeG4a	WeG6	WeG10	WeG12	WeG15
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?		+	+	+	+	+	+	+	+	+	+	+	+	+	+
2.2 Ensure there is no increase in flood risk to people or property, taking into account climate change?		0	0	0	0	0	-	0	0	0	0	-	0	0	0
4.2 Significantly reduce greenhouse gas emissions from transport?	Proximity to employment and services	++	++	++	++	0	0	++	++	++	++	++	++	++	++
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++	++
4.3 Avoid and reduce air pollution	Proximity to employment and services	++	++	++	++	0	0	++	++	++	++	++	++	++	++

SA Objectives		Likely Effects														
		Reasonable Alternatives														
		Cuffley				Brookmans Park				Welham Green					Little Heath	
		Cuf4	Cuf5	Cuf10	Cuf 12	BrP1	BrP6	BrP12	WeG1	WeG3	WeG4a	WeG6	WeG10	WeG12	WeG15	Brp7
	Proximity to transport services	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
4.4 Protect and enhance open space and landscape character, retaining local distinctiveness?	Open Space	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Landscape character	--?	--?	--?	--?	-?	-?	--?	-?	-?	0	-?	-?	-?	-?	-?
	Previously Developed Land	0	0	0	0	0	0	0	+++?	0	++?	0	0	0	0	++?
	Retaining local distinctiveness	--	--	--	--	--	--	--	0	-	-	--	-	-	-	--?
4.5 Conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings?		-?	0	0	0	--?	--?	0	0	-?	--? /+?	--?	0	0	-?	-?-/++?
4.6 Protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?		--?	--?	--?	?	--?	--?	--?	-?	-?	--?	--?	--?	--?	--?	?

SA Objectives		Likely Effects														
		Reasonable Alternatives														
		Cuffley				Brookmans Park				Welham Green					Little Heath	
		Cuf4	Cuf5	Cuf10	Cuf 12	BrP1	BrP6	BrP12	WeG1	WeG3	WeG4a	WeG6	WeG10	WeG12	WeG15	Brp7
4.8 Avoid water pollution		0	0	0	0	0	-?	-?	-?	-?	0	-?	0	0	-?	0
4.10 Promote conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land		-	-	-	-	-	-	-	+?	-	+/-	-	-	-	-	-
5.1 Provide the right amount, type and tenure of housing to meet identified local needs?	Amount of housing	+	+	0	+	0	+	0	0	0	0	0	0	0	+	+
	Affordable housing	++	++	++	++	++	++	++	++	+	++	++	++	++	++	++
	Dwellings for older people	++	++	++	++	++	++	++	++	+	++	++	++	++	++	++
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	0	0	0	0	0	0	0	0	0	0	0	0	0	0

SA Objectives	Likely Effects														
	Reasonable Alternatives														
	Cuffley				Brookmans Park				Welham Green						Little Heath
	Cuf4	Cuf5	Cuf10	Cuf 12	BrP1	BrP6	BrP12	WeG1	WeG3	WeG4a	WeG6	WeG10	WeG12	WeG15	Brp7
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?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6.4 Sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6.5 Avoid sterilisation of mineral resources	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6.6 Provide access to training, skills development and lifelong learning to meet identified needs	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?	++?

New village

Alternatives considered

- 6.405 No reasonable alternative sites for a new village were identified by WHBC for the purposes of SA. However, the other reasonable alternative sites within or adjacent to Welwyn Garden City, Hatfield and the named villages could all be considered to be reasonable alternatives in their own right. The likely effects of developing these reasonable alternatives are reported earlier in Chapter 6 of this SA Report.

Policy SP 24: New Village – Symondshyde (SDS6)

- 6.406 Policy SP 24 provides for a new village of approximately 1,130 homes to be developed north west of Hatfield over the plan period. The policy sets out the requirements in terms of mix uses and design principles that should apply to the new village, and that it will be subject to a masterplan that will form the basis of a Supplementary Planning Document.

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.407 The site is considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as it is in reasonable walking distance of a range of services such as schools, open space etc. Although this site already scores positively, Policy SP 24 requires future proposals to include community facilities, including a community centre and leisure facilities, which would benefit residents in Welwyn Hatfield as well recreation and leisure spaces to help encourage an active and healthy lifestyle.
- 6.408 In relation to SA objective 5.1 (the provision of affordable housing and dwellings for older people), this site is considered to have a significant positive effect on affordable housing and the supply of homes for older people. The site is expected to deliver more than 5% of the Borough's Objectively Assessed Housing Need, and it is therefore considered to have a significant positive effect with respect to meeting the housing need of the Borough.

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

- 6.409 Due to its proximity to an employment area, the site is considered to have a significant positive effect on both SA objective 4.2 (reduce greenhouse gas emissions from transport) and 4.3 (avoid and reduce air pollution). Policy SP 24 will also help to reinforce these positive effects by ensuring that there are improvements to public transport facilities.
- 6.410 The site is considered to have a significant negative uncertain effect on the landscape character as the site was assessed as having high landscape sensitivity (SA objective 4.4). It is also considered to have a minor negative effect on retaining local distinctiveness as the WHBC Green Belt Review scored the site as having a partial effect in relation to maintaining the existing settlement pattern (SA objective 4.4). A negligible effect was expected in relation to open land. To address these negative effects, Policy SP 24 requires future applications to make provision for landscaping and planting. This site was identified as greenfield land and grade 3 agricultural land and therefore scored a minor negative effect in relation to SA objective 4.10 (Conservation and sustainable use of land).
- 6.411 This site is adjacent to Long Grove Plantation and Titnol's Wood Local Wildlife Sites and Long Spring Local Wildlife Site/ Ancient Woodland. Symondshyde Great Wood Local Wildlife Site/ Ancient woodland is within 10m of the site on the western side of Hammonds Lane and within 500m of Benstead's Wood, Wet Grove, Fletcher's Wick and Furzefield Wood (near Hatfield) Local Wildlife Sites. Therefore, an uncertain significant negative effect is assumed for this site in relation to biodiversity (SA objective 4.6). Policy SP 24 recommends mitigation against this through balancing the needs of recreation and nature, providing suitable animal habitats and undisturbed areas.
- 6.412 The site includes Symondshyde Farmhouse Grade II Listed Building and an Area of Archaeological Significance (AAS53). The site is also between 250m and 1km of six other Grade II Listed Buildings including Upper Cromer Hyde Farmhouse, 16 and 18, Cromer Hyde, 12, Cromer Hyde,

gates and screen of Brocket Park to the south-west of Brocket Hall, the Crooked Chimney Public House and Astwick Manor (British Aerospace Technical School). Brocket Hall Registered Park and Garden is 395m away in the north east. Overall, this site has the potential for a significant negative effect on the setting of heritage assets. Mitigation is recommended in Policy SP24, which states that the site must provide "*Protection and enhancement of heritage assets, in particular the setting of Symondshyde Farmhouse, which is a Grade II listed building*".

- 6.413 In relation to flood risk to people or property (SA objective 2.2), this site is likely to have a negligible effect because it is outside flood zones 2 or 3. Policy SP 24 requires the provision of sustainable drainage and provision for flood mitigation, which could help prevent any future development from increasing flood risk on the site and elsewhere. Negligible effects were identified for the avoidance of water pollution (SA objective 4.8).

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

- 6.414 This site is not located within an Employment Area and is not within walking distance (1,400m) of Welwyn Garden City or Hatfield Town. Therefore it would have a negligible effect in relation to the supply and location of employment land (SA objective 6.1) and on the enhancement, vitality and attraction of Welwyn Garden City centre (SA objective 6.3). Negligible effects were identified for the sterilisation of mineral resources (SA objective 6.5).
- 6.415 An uncertain significant positive effect was identified in relation to access to education (SA objective 6.6) as the site is in reasonable walking distance of an educational establishment which has been assumed to have existing or future capacity to accommodate more students. Policy SP 24 seeks to ensure that development of the site includes education facilities, including two new form entry primary schools and associated play space, with provision for dual use of facilities for community purposes.
- 6.416 All other scores identified were either negligible or non-applicable to the assessment of this site.

Rural areas

Alternatives considered

- 6.417 Issues and Options alternatives PG27, PG28 relate to development of the policies in this section of the Proposed Submission Local Plan.
- Option PG27: Should we plan to maximise densities in any areas that are released from the Green Belt so as to minimise the amount of land that needs to be released?
 - Option PG28: Should we plan for densities in any areas that are released from the Green Belt, which reflect the density of any adjoining settlement, even if this would mean that more land would need to be released from the Green Belt?
- 6.418 At the Emerging Core Strategy stage (2012), draft Policy CS 20: Villages and Rural Areas was subject to SA, and an updated draft Policy CS 20: was also appraised at Local Plan Consultation Document stage (2015).

Policy SP 25: Rural Development

- 6.419 The policy seeks to ensure rural areas remain economically and socially viable in a manner which does not impact on the openness of the Green Belt or protection of critical assets. The policy supports sustainable farming and other countryside-based enterprises along with the retention of local facilities and the provision of new facilities and infrastructure.

SA findings

- 6.420 A significant positive effect is expected for SA objective 6.4 (sustain rural communities and their economies) as the policy directly relates to sustain rural communities and their economies.
- 6.421 The policy will have minor positive effect for health (SA objective 1.1 and SA objective 1.2) and crime and anti-social behaviour (SA objective 2.1) on account of the policy supporting a range of local facilities, many of which may contribute to improving the physical and mental health of

Borough's residents and social inclusion. A minor positive effect is expected for SA objective 4.3 (air pollution), SA objective 4.4 (landscape character), SA objective 4.5 (heritage assets), SA objective 4.6 (biodiversity) and SA objective 4.8 (water pollution) due to the policy recognising the importance of affording protection to the Borough's critical assets. The policy makes provision for limited infill development and the re-use or conversion of existing buildings. This will contribute to housing supply and efficiency of land use resulting in a minor positive effect for SA objective 4.10 (conservation and sustainable use of land) and SA objective 5.1 (housing).

Policy SADM 34: Development in the Green Belt

- 6.422 This policy makes provision for limited infilling or the partial or complete redevelopment of previously developed sites within the green belt. The policy also identifies a number of Major Developed Sites in the Borough where limited infill development or replacement buildings could occur.

SA findings

- 6.423 The likely effects of the policy are mainly positive or significantly positive, as this provides considerable mitigation for the potential impacts of development in the green belt, due to the criteria that it sets out for development to adhere to. A significant positive effect is expected for SA objective 4.4 (landscape character) due to the policy seeking to protect the openness and character of the Green Belt land by only permitting development when it complies with certain criteria.
- 6.424 Minor positive effects are expected in relation to SA objective 1.1 and SA objective 1.2 (health), as the policy will protect the countryside for people's enjoyment and will allow appropriate facilities for outdoor sport, outdoor recreation. Furthermore, protection of the countryside, along with the appropriate design and scaling of any developments that do occur, will have minor positive effects for SA objective 4.5 (heritage assets) and SA objective 4.6 (biodiversity). Replacement buildings will be permitted provided that the new building is not materially larger than the one it replaces. This will improve the efficiency of land use thereby having a minor positive effect for SA objective 4.10 (conservation and sustainable use of land). The policy will allow limited residential infill in the Borough's Green Belt resulting in a minor positive effect for SA objective 5.1 (housing). The policy will also allow for business expansion of four major developed sites in the greenbelt and for limited infill development and change of use proposals, sustaining both businesses and local communities resulting in a minor positive for SA objective 6.1 (the supply, location and quality of business and employment sites), and SA objective 6.4 (sustain rural communities and their economies). By only permitting development in certain circumstances, the policy indirectly encourages the recycling of previously developed, derelict and other urban land within existing settlements. This is likely to contribute to regeneration within the Green Belt and within the Borough's existing settlements. Therefore a minor positive effect is expected for SA objective 6.2 (encourage economic investment in those areas most in need of regeneration).

Policy SADM 35: Site allocations within the Rural Areas

- 6.425 Policy SADM 35 allocates site SDS6 Symonshyde (new village, appraised under SP24), HS33 Barbaraville, Mill Green (Gypsy and Traveller site) and HS34 Coopers Green Lane (Gypsy and Traveller site) for development within the rural area. The SA findings below for this policy relate solely to both of the gypsy and traveller sites. The SA findings for the new village are reported above under **Policy SP 24: New Village – Symondshyde (SDS6)**.

SA findings - social objectives (1.1, 1.2, 5.1)

- 6.426 **Both sites** were considered to have minor positive effects on SA objectives 1.1 and 1.2 (health) as they are all in reasonable walking distance of a range of services.
- 6.427 **Both sites** were considered to have a significant positive effect on SA objective 5.1 (in relation to amount of housing). HS33 provides capacity for 4 pitches and HS34 provides capacity for 11 pitches, both of which is above the 5% (3 pitches). Both sites are also likely to have a negligible effect on affordable housing and dwellings for older people (as a Gypsy and Traveller site and is not required to make provision for either).

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

- 6.428 Due to its proximity to employment and services and public transport services **Site HS34** is considered likely to have a significant positive effect on both SA objective 4.2 (reduce greenhouse gas emissions from transport) and SA objective 4.3 (avoid and reduce air pollution). **Site HS33** is all likely to have a significant positive effect in relation to their proximity to transport and a minor positive or negligible effect in relation to the proximity to employment and services.
- 6.429 **Both sites** are considered likely to have a negligible effect on the open space component of SA objective 4.4. With regards to the landscape character component of SA objective 4.4, **both sites** are likely to have uncertain minor negative effects as they were both assessed as having medium landscape sensitivity effects. **HS34** is assessed as having a negligible effect on retaining local distinctiveness (also SA objective 4.4) as the WHBC Green Belt Review scored the site as having a limited effect in relation to maintaining the existing settlement pattern. **HS33** is assessed as having an uncertain minor negative effect as the WHBC Green Belt Review scored the site as having a partial effect in relation to maintaining the existing settlement. Both sites are on greenfield land and so a negligible effect is expected for that element of SA objective 4.4
- 6.430 In relation to protecting and enhancing biodiversity sites **HS33** and **HS34** are considered to have an uncertain minor negative impact on biodiversity.
- 6.431 A registered Park and Garden is within 250m of **HS33** and a significant negative (uncertain) effect on the Registered Park is therefore assumed for SA objective 4.5 (Conservation of heritage and cultural assets). Due to the upward sloping character of the Registered Park and Gardens, it is possible that there may be views towards / from the proposed site. However, this effect should be mitigated by the context of the site, which is set back from the A414 (Hertford Road), screened by hedgerow and trees, and behind an existing mobile home site. It is also adjacent to the buildings associated with the sewage works and Groundworks, and as a small site of 4 pitches will not significantly add to the existing built development in this location. Mitigation may be possible through planting along its boundaries. An uncertain minor negative is therefore expected overall. Although **HS34** sites lie within 250m and 1km of a Listed Building, it was considered that trees, shrubbery and existing buildings would reduce their impact upon the heritage assets and their settings. Therefore, although there is a potential for an uncertain minor negative effect, it is likely that given the local setting, the effect is likely to be negligible for SA objective 4.5 (Conservation of heritage and cultural assets).
- 6.432 In relation to the increase in flood risk to people or property (SA objective 2.2) **both sites** are likely to have a negligible effect. The site-specific considerations for site **HS33** require a Flood Risk Assessment due to an ordinary watercourse running through the site, and states that mitigation via SuDS may be required.
- 6.433 Site **HS33** is located within the outer impact zone and therefore could have an uncertain minor negative effect on the avoidance of water pollution (SA objective 4.8). **HS34** scores a negligible effect for this objective.
- 6.434 **HS34** is expected to have a significant negative effect on the conservation and sustainable use of land (SA objective 4.10) as the site is located entirely on grade 2 agricultural land. **HS33** is considered to have an uncertain minor positive effect for this objective as the site is located on grade 3 agricultural land.

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

- 6.435 **Both sites** are likely to have a significant but uncertain positive effect on economic objectives in terms of access to education (SA objective 6.6) as they are in reasonable walking distance of an educational establishment which are assumed to have existing or future capacity to accommodate more students. However, for site **HS33**, the A414 (Hertford Road) limits access to The Ryde School and therefore the overall score has been reduced to a minor positive effect
- 6.436 None of the sites are considered to have significant or minor negative effects on or the sterilisation of mineral resources (SA objective 6.5).
- 6.437 All other effects assessed for the economic objectives were either negligible or non-applicable to the assessment of these sites.

Policy SP 26: Neighbourhood Planning

6.438 The policy requires neighbourhood plans to demonstrate how they contribute to the strategic objectives of the Local Plan and are in general conformity with its strategic policies; to clearly set out how they will promote sustainable development in accordance with the principles set out in Policy SP1; and to demonstrate that they have had regard to information on local need for new homes, jobs and facilities for their plan area.

SA findings

6.439 A significant positive effect is expected for SA objective 3.1 (involvement of the public in the planning process). Local communities have been empowered by the Localism Act 2011 to lead neighbourhood planning in their communities and neighbourhood planning allows communities to shape development in their areas. All other objectives are expected to a negligible effect.

Summary of SA scores

6.440 The SA scores for the Proposed Submission Local Plan non-site specific policies for Rural Areas are shown in **Table 6.24**.

Table 6.24: Summary SA scores for the non-site allocation policies for Rural Areas

SA Question: Will the policy...	SP25	SADM 34	SP26
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	+	+	0
...lead to improved health for all? (1.2)	+	+	0
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	+	0	0
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	0	0	0
...encourage involvement of the public in the planning process? (3.1)	0	0	++
...significantly reduce greenhouse gas emissions from built development? (4.1)	0	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	0	0	0
...avoid and reduce air pollution? (4.3)	+	0	0
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	+	++	0
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)	+	+	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	+	+	0
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions? (4.7)	0	0	0
...avoid water pollution? (4.8)	+	0	0
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	0	0	0
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)	+	+	0

SA Question: Will the policy...	SP25	SADM 34	SP26
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	+	+	0
...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)	0	+	0
...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)	0	+	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	0	0	0
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	++	+	0
...avoid the sterilisation of mineral resources? (6.5)	0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	0	0	0

6.441 The SA scores for the Proposed Submission Local Plan site specific policies for Rural Areas are shown in **Table 6.25**.

Table 6.25: Summary SA scores for site specific allocations for Rural Areas

SA Question: Will the policy...		SDS6 (SP24)	HS33 (SADM37)	HS34 (SADM37)
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)		+	+	+
...lead to improved health for all? (1.2)				
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)		0	0	0
...significantly reduce greenhouse gas emissions from transport? (4.2)	Proximity to employment and services	++	0	++
	Proximity to transport services	0	++	++
...avoid and reduce air pollution? (4.3)	Proximity to employment and services	++	0	++
	Proximity to transport services	0	++	++
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	Open Space	0	0	0
	Landscape character	--?	-?	-?
	Previously Developed Land	0	0	0
	Retaining local distinctiveness	-	-?	0
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings? (4.5)		--?	-?	0
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)		--?	-?	-?
...avoid water pollution? (4.8)		0	-?	0

SA Question: Will the policy...		SDS6 (SP24)	HS33 (SADM37)	HS34 (SADM37)
...promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land? (4.10)		-	-?	--
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	Amount of housing	++	++	++
	Affordable housing	++	0	0
	Dwellings for older people	++	0	0
...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)		0	0	0
...enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)		0	0	0
...avoid the sterilisation of mineral resources? (6.5)		0	0	0
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)		++?	+?	++?

Cumulative effects

Cumulative effects of the Proposed Submission Local Plan

- 6.442 The SA of policies and site allocations considered the likely effects of development in relation to the SA objectives before mitigation, and identified policies in the Local Plan which would assist in mitigating the effects identified. This section draws the findings together to consider the effects of the Local Plan as a whole in relation to each SA objective, taking into account mitigation.
- 6.443 A summary of the cumulative effects of all the policies in the Proposed Submission Local Plan is provided by SA objective below.

SA objective 1.1: Will the Proposed Submission Local Plan lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health?

- 6.444 The SA of the policies and site allocations indicate that the effects of the Proposed Submission Local Plan on addressing health inequalities are broadly positive. No significant negative effects were identified.
- 6.445 There is considerable emphasis in the Proposed Submission Local Plan on healthy activities such as walking and cycling, and the delivery of homes and employment land (and thus jobs) along with open space and green infrastructure should help to meet the essential needs of residents of Welwyn Hatfield, helping to address levels of stress. All of the site allocations were assessed as having minor positive effects, and Policy SP 4: Transport and Travel, SADM 7: New Community Services and Facilities and Losses of Community Services and Facilities, SADM 12: Parking, Servicing and Refuse, and SADM 18: Environmental Pollution were considered likely to have significant positive effects.
- 6.446 Overall, it is considered that the Proposed Submission Local Plan will have a **minor positive cumulative effect** on SA objective 1.1.

SA objective 1.2: Will the Proposed Submission Local Plan lead to improved health for all?

- 6.447 It was difficult to distinguish from the Proposed Submission Local material differences in the effects on SA objective 1.1, which addresses health inequalities, and SA objective 1.2, which addresses health more generally.
- 6.448 Similar conclusions on the cumulative effects are therefore anticipated, resulting in a **minor positive cumulative effect** on SA objective 1.2.

SA objective 2.1: Will the Proposed Submission Local Plan reduce opportunities for crime and anti-social behaviour, and reduce fear of crime?

- 6.449 The site allocations were not assessed against this SA objective as it was considered that the location of development would be unlikely to have a material effect on crime rates.
- 6.450 A number of other policies in the Proposed Submission Local Plan were considered to have minor positive effects but no significant effects were identified. Overall, it is considered that the Proposed Submission Local Plan will have a **minor positive cumulative effect** on SA objective 2.1.

SA objective 2.2: Will the Proposed Submission Local Plan ensure there is no increase in flood risk to people or property, taking into account climate change?

- 6.451 Very few effects were identified with respect to this SA objective from the Proposed Submission Local Plan. Most of the site allocations were considered to have a neutral effect, and no significant negative effects were identified. As a result, Policy SP 3: Settlement Strategy and Green Belt Boundaries was assessed as having a significant positive effect on this SA objective given that the overall strategy seeks to avoid areas at risk of flooding. Policies SADM 14: Flood Risk and Surface Water Management, and SP 12: Strategic Green Infrastructure, were considered likely to have significant positive effects given the primary purpose of SADM 14 is to manage flood risk sustainably, and green infrastructure can play a very useful role in providing sustainable drainage systems.
- 6.452 Overall, given that the site allocations are not in significant flood risk areas, it is considered that the Proposed Submission Local Plan will have a **neutral cumulative effect** on SA objective 2.2.

SA objective 3.1: Will the Proposed Submission Local Plan encourage involvement of the public in the planning process?

- 6.453 There were very few effects identified by the SA from the Proposed Submission Local Plan on this SA objective. Only one significant positive effect was identified, which was for Policy SP 26: Neighbourhood Planning.
- 6.454 The preparation process for the Proposed Submission Local Plan itself has involved extensive public consultation, and has generated a large volume of consultation responses. This, in itself, is an indication of public interest in future development in the Borough.
- 6.455 Neighbourhood Planning is an important new component of the planning system, which did not exist when the SA Framework was set up. This will go a long way to meeting the intention of SA objective 3.1.
- 6.456 Therefore, even though the majority of policies did not score any effects, the inclusion of Policy SP26: Neighbourhood Planning, together with public consultation on the Local Plan at all stages, suggests that a **minor cumulative positive effect** is warranted.

SA objective 4.1: Will the Proposed Submission Local Plan significantly reduce greenhouse gas emissions from built development?

- 6.457 The scale of development proposed in the Proposed Submission Local Plan will inevitably require energy in both construction on site and use of materials in the construction process, as well as in operation, through the need for heat and light. This will increase greenhouse gas emissions from built development for the Borough as a whole, as was recognised by the significant adverse effect identified by the SA of Policy SP 2: Targets for Growth.
- 6.458 However, the Proposed Submission Local Plan includes policies that seek to minimise greenhouse gas emissions. Policy SP 10: Sustainable Design and Construction, and Policy SADM 13: Sustainability Requirements, both scored significant positive effects in this regard.
- 6.459 Overall, therefore, it is considered that the Proposed Submission Local Plan is likely to have both a **significant cumulative positive effect** and a **significant cumulative negative effect** on this SA objective.

SA objective 4.2: Will the Proposed Submission Local Plan significantly reduce greenhouse gas emissions from transport?

- 6.460 The scale of development will inevitably give rise to increases in traffic volumes. This, by itself, is likely to give rise to a **significant negative cumulative effect**, as recognised in the SA of Policy SP 2: Targets for Growth.
- 6.461 However, the Proposed Submission includes a number of policies that seek to reduce the need to travel by car, most notably Policy SP4: Transport and Travel and Policy SADM 3: Sustainable Travel for All which both scored significant positive effects on this SA objective.
- 6.462 To reinforce the likelihood of Policy SP4 and Policy SADM 3 having the desired effect, the assessment of the allocated sites found that nearly all allocated sites are well located to services and facilities and/or employment areas, and have access to public transport, reducing the need to travel. The site allocations at the villages to the south of Hatfield tended to score better than those allocations at the villages north of Welwyn Garden City in this regard.
- 6.463 Therefore, despite the inevitable increase in greenhouse gas emissions arising from increased traffic, the Proposed Submission Local Plan has sought to ensure that cars are not needed for many journeys, resulting in a **significant positive cumulative effect** in terms of mitigation.

SA objective 4.3: Will the Proposed Submission Local Plan avoid and reduce air pollution?

- 6.464 The scores for this objective tended to mirror the scores for SA objective 4.2, as both are dependent upon traffic generated by development planned in the Proposed Submission Local Plan.
- 6.465 Therefore, both **cumulative negative effects** and **cumulative positive effects** are likely to arise with respect to SA objective 4.3.

SA objective 4.4: Will the Proposed Submission Local Plan protect and enhance open space and landscape character, retaining local distinctiveness?

- 6.466 The main effects on this SA objective will arise from the site allocations. The appraisal of Policy SP 3: Settlement Strategy and Green Belt Boundaries found that there would be a mix of significant positive and significant negative effects on landscape character and local distinctiveness.
- 6.467 A few of the sites around Welwyn Garden City were found by the SA potentially to give rise to significant adverse effects at least against some components of this SA objective, prior to mitigation, including SDS1, SDS2, HS2, MUS1 and HS6. However, a number of the sites in and around Welwyn Garden City scored well because they would include the re-use of previously developed land.
- 6.468 For the sites at Hatfield, potential significant negative effects were identified for some components of this SA objective including SDS5, HS9, HS11 and HS13, prior to mitigation. A number of the sites in and around Hatfield also scored well because they would include the re-use of previously developed land. Three of the allocated sites at the villages north of Welwyn Garden City and four of the allocated sites at the villages south of Hatfield, plus the proposed new village at Symondshyde, also had potential significant negative effects on components of this SA objective prior to mitigation.
- 6.469 The Proposed Submission Local Plan includes both within the site allocation policies and in other policies mitigation measures to avoid or reduce the likelihood of these effects occurring. In particular Policy SP 12: Strategic Green Infrastructure, Policy SADM 15: Heritage, and Policy SADM 16: Ecology and Landscape are likely to prove useful in ensuring that the effects are minimised.
- 6.470 In seeking to judge the cumulative effects of the Proposed Submission Local Plan as a whole on this SA objective is difficult. The scale of development and the sensitivity of some of the locations in landscape terms suggest a significant cumulative negative effect might result, as reflected in the appraisal of Policy SP 3, but the mitigation provided in the Proposed Submission Local Plan will help to reduce this potentially to a **minor cumulative negative effect** over the course of time, although this is a considerable element of uncertainty over this judgment.

SA objective 4.5: Will the Proposed Submission Local Plan conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets and their settings?

- 6.471 The scale of growth in the Proposed Submission Local plan has the potential to adversely affect the heritage interest of the Borough. Prior to mitigation all of the strategic site allocations for Welwyn Garden City, plus sites MUS1 and HS6 were considered to have the potential for significant adverse effects on this SA objective. For Hatfield, the strategic allocation and sites MUS2 and MUS3 were considered to have the potential for significant adverse effects. Site HS15 at Woolmer Green, Sites HS24 and HS25 at Little Heath, and the new village at Symondshyde were all considered to have potentially significant adverse effects. These effects were primarily based on their proximity to heritage assets, and in all instances the effects were uncertain depending upon the site context and mitigation.
- 6.472 The Proposed Submission Local Plan includes various policies that will help to mitigate the effects of development on the historic environment and character of the Borough. These include safeguarding criteria in the site specific policies in the Proposed Submission Local Plan, plus other strategic and development management policies, including Policy SP 9: Place Making and High Quality Design, Policy SADM 15: Heritage, and Policy SP 15: The Historic Environment of Welwyn Garden City, all of which were considered to have significant positive effects on this SA objective.
- 6.473 The Proposed Submission Local Plan has sought to avoid significantly affecting heritage assets and the settings of the assets, particularly those that are of such importance as to warrant designation. However, despite the strong mitigation included in the Proposed Submission Local Plan, it cannot be guaranteed that will not be any effects. As a result, it is considered that the Proposed Submission Local Plan as a whole will have a **minor negative cumulative effect** on this SA objective.

SA objective 4.6: Will the Proposed Submission Local Plan protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change?

- 6.474 As with SA objectives 4.4 and 4.5, the main effects on this SA objective will arise from the site allocations. The appraisal of Policy SP 3: Settlement Strategy and Green Belt Boundaries found that directing two thirds of development towards Welwyn Garden City and Hatfield would help to minimise potential negative impacts on biodiversity and geodiversity, but given Policy SP 2: Targets for Growth and a more proportionate distribution of development, it is considered that increased negative impacts on this objective would occur. This is due to the number of nationally and locally designated sites in the Borough, located in proximity to many of the excluded villages and rural areas.
- 6.475 Prior to mitigation, six of the allocated sites at Welwyn Garden City and four of the allocated sites at Hatfield have the potential to have significant negative effects on this SA objective. Similarly, ten of the sites allocated at the villages and the planned new village at Symondshyde have the potential to have significant adverse effects on biodiversity prior to mitigation.
- 6.476 Mitigation is provided within the site policies themselves, and also by Policy SP 10: Sustainable Design and Construction, SP 12: Strategic Green Infrastructure, and SADM 16: Ecology and Landscape. Taken together these should help to reduce the risk of significant cumulative negative effects occurring. It is also of note that the Habitats Regulations Assessment concluded that there would no adverse effects on the integrity of European sites as a result of the Welwyn Hatfield Proposed Submission Local Plan.
- 6.477 As with the landscape SA objective 4.4, it is difficult to be definitive about the cumulative effects of the Proposed Submission Local Plan but, once mitigation is taken into account, it could lead to potentially **minor cumulative negative effects**.

SA objective 4.7: Will the Proposed Submission Local Plan reduce water consumption, and provide for reliable sources of water supply even in drought conditions?

- 6.478 Welwyn Hatfield is an area classified as being 'water stressed' in that the current household demand forms a high proportion of the current effective rainfall that is available. The scale of housing and employment growth planned for with the Proposed Submission Local Plan is likely to

place further pressure on water resources. This is reflected in the significant negative effect given for SP 2: Targets for Growth for this SA objective.

6.479 The response of the Proposed Submission Local Plan is to encourage water efficiency in development and in the management of the water environment. This is directly addressed through SADM 13: Sustainability Requirements, which requires all newly constructed dwellings to achieve an estimated water consumption of no more than 110 litres day, which is well below current consumption levels. Other policies that indirectly should have significant positive effects are Policies SP 1: Delivering Sustainable Development, SP 10: Sustainable Design and Construction, and SP 11: Protection and Enhancement of Critical Environmental Assets. In addition, Policy SP 13: Infrastructure Delivery seeks to ensure that supporting infrastructure (which will include water supply infrastructure) is provided in advance of, or alongside development, unless there is sufficient existing capacity.

6.480 Although water consumption is likely to increase as a result of the Proposed Submission Local Plan, the mitigation provided in the Proposed Submission Local Plan reduces the potential significant negative cumulative effect to a **minor negative cumulative effect** on SA objective 4.7.

SA objective 4.8: Will the Proposed Submission Local Plan avoid water pollution?

6.481 The large scale of development planned for in the Proposed Submission Local Plan poses threats to water quality from contaminated surface run-off, and increased pressure on waste water treatment works.

6.482 To avoid such effects happening, the Proposed Submission Local Plan includes SP 10: Sustainable Design and Construction and Policy SP 11: Protection and Enhancement of Critical Environmental Assets, which encourage water sensitive design principles and protection and enhancement of the ecological status of water bodies. Both these policies were considered to have significant positive effects.

6.483 In addition, Policy SP 13: Infrastructure Delivery seeks to ensure that supporting infrastructure (which will include waste water treatment infrastructure) is provided in advance of, or alongside development, unless there is sufficient existing capacity. It should be noted that studies and planning for the upgrade of waste water treatment works are on-going between those local planning authorities including Welwyn Hatfield whose development is served by them, and the Environment Agency and water companies. The Hertfordshire Sub-Catchment Solutions study, which will provide an update to previous Water Cycle Studies is expected to be published in September 2016. Therefore any capacity issues are being carefully looked into and where possible addressed.

6.484 It is anticipated that a **cumulative neutral effect** on SA objective 4.8 will result.

SA objective 4.9: Will the Proposed Submission Local Plan minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced?

6.485 The influence of the Proposed Submission Local Plan is limited with respect to waste generation. More significant influences are waste regulations, and the work of the waste management and waste planning authority.

6.486 No significant negative effects were identified and Policy SP 10: Sustainable Design and Construction was the only policy identified to have a significant positive effect, because it includes a number of criteria relating to the re-use and recycling of land, buildings and materials, and the encouragement of lifecycle techniques, and space for recycling of domestic and commercial waste in development.

6.487 Overall, the Proposed Submission Local Plan is likely to have a **minor positive cumulative effect** on SA objective 4.9.

SA objective 4.10: Will the Proposed Submission Local Plan promote the conservation and sustainable use of productive agricultural land and maximise the sustainable use of previously developed land?

- 6.488 The planned growth in the Proposed Submission Local Plan means that a significant proportion of it will have to take place on greenfield land, which could include best and most versatile agricultural land. Where best and most versatile agricultural land is lost to development, this is irreversible. None of the sites allocated at Welwyn Garden City were considered to have significant negative effects on this SA objective, although two of the Hatfield site allocations were considered likely to have significant negative effects including the strategic allocation SDS5, North West Hatfield. None of the sites allocated at the villages were considered to have significant negative effects although one of the Gypsy and Traveller sites (HS34) was assessed as potentially having a significant negative effect.
- 6.489 A number of policies had minor positive effects, including Policy SP 11: Protection and Enhancement of Critical Environmental Assets, because it seeks to protect the best and most versatile agricultural land that has the greatest potential for local food security. SADM 18: Environmental Pollution was considered likely to have a significant positive effect because it addresses contaminated land and soil pollution. A small number of policies had minor negative effects.

- 6.490 The Proposed Submission Local Plan seeks to avoid the development of best and most versatile agricultural land and therefore, but to reflect the fact that there will nonetheless be loss of such land, it is considered that a **minor negative cumulative effect** is likely on SA objective 4.10.

SA objective 5.1: Will the Proposed Submission Local Plan provide the right amount, type and tenure of housing to meet identified local needs?

- 6.491 One of the primary purposes of the Proposed Submission Local Plan is to provide and plan for enough homes to meet housing need.
- 6.492 Although the Council has determined that it is likely to fall a little short of its full objectively assessed housing need, the number of homes to be delivered as a result of the Proposed Submission Local Plan will represent a step change, with an increase of 55% in annual delivery rates relative to the historical rate of development. This was reflected in the significant positive effect given in the appraisal of Policy SP 2: Targets for Growth. To increase delivery rates beyond this is likely to be a challenge, given the capacity of the construction industry and similar demands being placed upon it by a large number of local planning authorities through their Local Plans.
- 6.493 Then, housing delivery is to be achieved by a combination of strategic sites and smaller sites, some of which are of a large scale in their own right relative to the settlement where they will be located. Policy SP 3: Settlement Strategy and Green Belt Boundaries was appraised as having a significant positive effect on this SA objective. The strategic allocations all scored significant positive effects, as did the new village proposed at Symondshyde under Policy SP 24, because each contributes at least 5% of the Proposed Submission Local Plan housing target. It is of note that SADM 1: Windfall Development also scored a significant positive effect with respect to the amount of housing because it will represent more than 5% of the planned supply.
- 6.494 There a number of policies that aim to ensure the right type of housing, including Gypsy and Traveller pitches, are provided. These are often built into the site specific policies, but Policy SP 7: Type and Mix of Housing is also of note, because it is this policy that sets the requirements with respect to affordable housing and a range of other housing needs, for the Proposed Submission Local Plan as a whole.
- 6.495 The Proposed Submission Local Plan is likely to have a **significant positive cumulative effect** on SA objective 5.1.

SA objective 6.1: Will the Proposed Submission Local Plan ensure the supply, location and quality of business and employment sites reflects the needs of local businesses and encourages a mixed and greener economy?

- 6.496 The Proposed Submission Local Plan provides for enough employment land to meet the Borough's housing target as identified in the Economy Study Update, although in terms of floorspace there is potentially going to be shortfall in Class B provision. Despite this, the Council anticipates the growth in the number of jobs forecast in the Economy Study Update to be met. This was reflected in significant positive effect for Policy SP 2: Targets for Growth.
- 6.497 Policy SP 3: Settlement Strategy and Green Boundaries was also considered likely to result in a significant positive effect. A number of the sites allocated are anticipated to give rise to significant positive effects on this objective, including the Broadwater Road West sites at Welwyn Garden City (SDS3 and SDS4 as presented in Policy SP 17), and MUS1, and in Hatfield Hat1 (Policy SP 22: North West Hatfield) and MUS2 (Policy SADM 22: 1 Town Centre and 3 to 9 Town Centre) at Hatfield. Site SDS7 (Policy SP 23: Marshmoor Policy Area) at Welham Green is also considered to have a significant positive effect.
- 6.498 For the non site-specific policies, Policy SADM 4: Development in Designated Centres, Policy SP 8: Local Economy, and Policy SADM 10: Employment Development were all considered likely to have significant positive effects.
- 6.499 As a result, it is considered that the Proposed Submission Local Plan is likely to have a **significant positive cumulative effect** on SA objective 6.1.

SA objective 6.2: Will the Proposed Submission Local Plan encourage economic investment in those areas most in need of regeneration, in a way that will benefit those most in need of rewarding employment?

- 6.500 Policy SP 3: Settlement Strategy and Green Boundaries is considered likely to result in a significant positive effect on this SA objective, and two non site-specific policies in the Proposed Submission Local Plan were also found by the SA to have a significant positive effect on this SA objective. These were Policy SP8: Local Economy, and Policy SP 20: Hatfield Town Centre Strategy. In addition, two site of the site allocations at Hatfield, being Policy SP 22: North West Hatfield, and MUS 2 (1-9 Town Centre) in Policy SADM 22, were considered likely to have significant positive effects.
- 6.501 Although none of the other sites or policies were assessed as likely to have significant positive effects, the above policies in combination have the potential to make a material difference to the life opportunities for residents in the more deprived communities particularly in Hatfield.
- 6.502 As a result, it is considered that the Proposed Submission Local Plan will have a **significant positive cumulative effect** on SA objective 6.2.

SA objective 6.3: Will the Proposed Submission Local Plan enhance the vitality and attraction of Welwyn Garden City and Hatfield town retail centres?

- 6.503 The Proposed Submission Local Plan provides strong support for the two main town centres in the Borough, which was reflected in the significant positive effect given for Policy SP 3: Settlement Strategy and Green Belt Boundaries. This will be achieved through Policy SP5: Quality and Location of Retail Development, Policy SADM 6: Shopfronts, Adverts and Signage, Policy SP 16: Welwyn Garden City Town Centre Strategy, Policy SP 20: Hatfield Town Centre Strategy, and Policy SADM 22: Development Elsewhere within the Hatfield Town Centre Core Retail Zone.
- 6.504 A number of the site specific policies are also considered likely to have significant positive effects on the two town centres, including in Welwyn Garden City Policy SP 17: Mixed Use Development Site at Broadwater Road West, Policy SADM 19: Town Centre North Development Site (MUS1), and in Hatfield 1-9 Town Centre (MUS2 in Policy SADM 22).
- 6.505 It is therefore considered that the Proposed Submission Local Plan will have a **significant positive cumulative effect** on SA objective 6.3.

SA objective 6.4: Will the Proposed Submission Local Plan sustain rural communities and their economies, small business and other rural diversification, while protecting rural character?

- 6.506 The Proposed Submission Local Plan provides for over a fifth of the planned housing development to be at the villages in the Borough and in the Rural Areas. This should help to support rural services and facilities, although a large proportion of this will be at the new village at Symondshyde. Where development is focused, and particularly at the new village location, the rural character is likely to experience some changes.
- 6.507 Policy SP 5: Quantity and Location of Retail Development (because it addresses retail facilities within the villages as well as the main towns), Policy SADM 4: Development in Designated Centres (for similar reasons as Policy SP 5), Policy SADM 5: Development Outside Designated Centres (which addresses individual convenience stores), and Policy SP 25: Rural Development, all were considered to have significant positive effects on this SA objective.
- 6.508 Overall it is considered that a **minor positive cumulative effect** on SA objective 6.4 is likely to result.

SA objective 6.5: Will the Proposed Submission Local Plan avoid the sterilisation of mineral resources?

- 6.509 The Borough contains sand and gravel resources that are of importance to the economy. The main unworked resources are safeguarded from development through the Hertfordshire Minerals Local Plan. Policy SP 12: Strategic Green Infrastructure was considered to have a significant positive effect because of its reference to working with the County Council with respect to recreational access associated with mineral extraction at Ellenbrook Park.
- 6.510 None of the sites were found to have significant negative effects on this SA objective, although the Proposed Submission Local Plan recognises that minerals may have to be extracted before some of the sites are developed, thereby avoiding the sterilisation of the mineral resource.
- 6.511 Even though few policies and sites scored significant positive effects in relation to SA objective 6.5, the Proposed Submission Local Plan does avoid the sterilisation of Preferred Areas in the Minerals Local Plan (adopted 2007) for mineral extraction, and where minerals exist they will be extracted before development takes place.
- 6.512 Therefore, it is considered that the Proposed Submission Local Plan will have a **significant positive cumulative effect** on SA objective 6.5.

SA objective 6.6: Will the Proposed Submission Local Plan provide access to training, skills development and lifelong learning to meet identified needs?

- 6.513 Policy SP 8: Local Economy, Policy SP 14: New Schools, and Policy SP 21: University of Hertfordshire of the Proposed Submission Local Plan were all considered to have significant positive effects on this SA objective.
- 6.514 With respect to sites, those allocations that have good access to educational facilities were considered to perform well in the SA. Every single allocated site was considered to have a significant positive effect in this regard, although the SA assumed that there is capacity to expand the educational facilities as appropriate, therefore some uncertainty exists. The Council considered school capacity, and the ability to expand on site or on identified sites, to help inform the selection of allocated sites.
- 6.515 The planned development at the strategic sites includes provision for new or additional educational facilities as appropriate, including new secondary schools at SDS5 North West of Hatfield, and at Birchall Garden Suburb, east of Welwyn Garden City. Policy SP 14: New Schools provides for a third secondary school if required to serve Welwyn Garden City.
- 6.516 It is considered that the Proposed Submission Local Plan will have a **significant positive cumulative effect** on SA objective 6.6.

Cumulative effects with other planned development

- 6.517 Welwyn Hatfield Borough does not exist in isolation. Neighbouring boroughs and districts are also required to meet their objectively assessed needs. For example, the publication draft of the St

Albans Local Plan (2016) to the west of Welwyn Hatfield includes proposals for 8,720 additional homes between 2011 and 2031. To the east of Welwyn Hatfield, East Herts Local Plan Preferred Options (2014) seeks to provide for a minimum of 15,000 homes in the period 2011-2031. Of particular note, is the proposal to include land for development to the east of Welwyn Garden City within East Herts District, which is referenced in the Welwyn Hatfield Proposed Submission Local Plan. Other districts such as Broxbourne, Stevenage, North Herts and Hertsmere also are planning for more development.

- 6.518 It is not possible to be precise about the cumulative effects of the development proposed in the Welwyn Hatfield Proposed Submission Local Plan in combination with all the other plans for surrounding districts and boroughs, but it is safe to conclude that there will be additional cumulative effects with respect to impacts on the landscape and biodiversity through increased urbanisation, and increased traffic arising from development with its associated emissions.
- 6.519 On the more positive side, the plans should lead to a step change in the provision of housing where it is very much needed, and where house prices are far in excess of average incomes. Similarly, the development should enable support for the growth of the economies of the districts and boroughs, which are so closely inter-linked. This in turn should lead to job creation, which will be needed for a rising population.
- 6.520 Development on this scale will provide opportunities for a more strategic and coordinated approach to protecting, enhancing and managing the environment, including water resource management, green infrastructure and habitat creation, and the benefits these provide for the Borough's communities.

7 Monitoring

Regulation 17 of the SEA Regulations states that:

(1) “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”; and

(2) “the responsible authority’s monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1)”

Schedule 2(9) of the SEA Regulations requires the Environmental Report to include:

“a description of the measures envisaged concerning monitoring”

- 7.1 National Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan. This is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA framework. As the Local Plan is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.
- 7.2 The Council has not yet prepared a monitoring framework to monitor implementation of the policies in the Draft Local Plan. Therefore the indicators included in **Table 7.1** may change as the Council finalises its monitoring framework. The acronym AMR refers to indicators that the Council already uses for its Annual Monitoring Report or related reports. Other indicators are suggested as an output of this Sustainability Appraisal.

Table 7.1: Proposed monitoring framework for effects identified by the SA of the Welwyn Hatfield Proposed Submission Local Plan

Will the plan, policy or proposal...	Proposed monitoring indicators
Long-term Objective 1: Health improvement	
...lead to reduced health inequalities, and in particular improve the health of those living in communities characterised by relatively poor health? (1.1)	<ul style="list-style-type: none"> Number of deprived Lower Super Output Areas (LSOAs) (AMR) Borough health profile and life expectancy (AMR)
...lead to improved health for all? (1.2)	<ul style="list-style-type: none"> Borough health profile and life expectancy (AMR)
Long-term objective 2: Safer communities	
...reduce opportunities for crime and anti-social behaviour, and reduce fear of crime? (2.1)	<ul style="list-style-type: none"> Number of recorded incidences of crime (AMR)

Will the plan, policy or proposal...	Proposed monitoring indicators
...ensure there is no increase in flood risk to people or property, taking into account climate change? (2.2)	<ul style="list-style-type: none"> • Planning applications granted contrary to Environment Agency advice (AMR) • Spatial extent of flood zones 2 and 3 • Residential properties flooded from main rivers • Distance to 'Areas susceptible to surface water flooding' – EA Maps • Number or % of permitted developments incorporating SuDS
Long-term Objective 3: Good citizenship	
...encourage involvement of the public in the planning process? (3.1)	<ul style="list-style-type: none"> • Public perception on involvement in the planning process • Number of neighbourhood plans adopted • Extent of resident population of the Borough living in an area with an adopted neighbourhood plan
Long term objective 4: Improving the environment	
...significantly reduce greenhouse gas emissions from built development? (4.1)	<ul style="list-style-type: none"> • Renewable energy generation (AMR) • Carbon emissions by source (ONS/DECC)
...significantly reduce greenhouse gas emissions from transport? (4.2)	<ul style="list-style-type: none"> • Carbon emissions by source (ONS/DECC) • New development accessibility by public transport (AMR) • Travel to work modes and flows • Car ownership • Public transport punctuality and efficiency
...avoid and reduce air pollution? (4.3)	<ul style="list-style-type: none"> • AQMA designations • NO₂ emissions • PM₁₀ emissions
...protect and enhance open space and landscape character, retaining local distinctiveness? (4.4)	<ul style="list-style-type: none"> • New development in the Green Belt (AMR) • Amount of urban open land (AMR) • Open space with a Green Flag Award • Change in landscape character
...conserve and enhance the Borough's character, sense of place and local distinctiveness, historic environment, heritage and cultural assets, and their settings? (4.5)	<ul style="list-style-type: none"> • Changes to the historic built environment (AMR) • Heritage assets 'at risk' • Loss of or damage to designated heritage assets
...protect and enhance biodiversity and geodiversity, taking into account the impacts of climate change? (4.6)	<ul style="list-style-type: none"> • Condition of SSSIs (AMR) • Amount of urban open land (AMR) • Open space with a Green Flag Award (AMR) • Achievement of local biodiversity targets
...reduce water consumption, and provide for reliable sources of water supply even in drought conditions?	<ul style="list-style-type: none"> • Water use per household • Water pollution incidents recorded by Environment Agency

Will the plan, policy or proposal...	Proposed monitoring indicators
(4.7)	
...avoid water pollution? (4.8)	<ul style="list-style-type: none"> Percentage of water bodies at good ecological status or potential. Percentage of water bodies assessed at good or high biological status. Percentage of water bodies assessed at good chemical status.
...minimise the amount of waste generated and maximise the re-use, recycling or composting of waste that cannot be reduced? (4.9)	<ul style="list-style-type: none"> Non-recyclable waste generation per capita Recycling rates per capita Re-use of construction and demolition waste
...promote the conservation and sustainable use of productive agricultural land and maximise use of previously developed land? (4.10)	<ul style="list-style-type: none"> Dwelling completions on brownfield sites (AMR) Dwelling completions on greenfield sites (AMR) Employment completions on brownfield sites Employment completions on greenfield sites
Long-term Objective 5: Decent housing	
...provide the right amount, type and tenure of housing to meet identified local needs? (5.1)	<ul style="list-style-type: none"> New dwellings and progress against housing target (AMR) New specialist needs housing (AMR) HMO monitoring (AMR) New dwelling density (AMR) Future housing trajectory and five year housing land supply(AMR) House prices (AMR) Housing affordability (AMR) New affordable housing completions (AMR) New Gypsy and Traveller sites (AMR) Unauthorised Gypsy and Traveller sites (AMR)
Long-term objective 6: A thriving economy	
...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)	<ul style="list-style-type: none"> Changes in employment floorspace (AMR) New employment floorspace on PDL (AMR) Loss of employment land to non-employment uses (AMR) Employment land availability (AMR) Number of enterprises (AMR) Jobs and job density (AMR) Average earnings (AMR) Unemployment levels (AMR)
...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)	<ul style="list-style-type: none"> Unemployment rates in deprived wards Performance of deprived wards against index of multiple deprivation indicators
...enhance the vitality and	

Will the plan, policy or proposal...	Proposed monitoring indicators
attraction of Welwyn Garden City and Hatfield town retail centres? (6.3)	<ul style="list-style-type: none"> • Changes in retail floorspace (AMR) • Proportion of vacant retail floorspace (AMR) • Evening economy premises (AMR) • Changes in leisure floorspace (AMR) • Changes in community facility floorspace (AMR)
...sustain rural communities and their economies, small businesses and other rural diversification, while protecting rural character? (6.4)	<ul style="list-style-type: none"> • Changes in retail floorspace (AMR) • Proportion of vacant retail floorspace (AMR) • Changes in employment floorspace (AMR)
...avoid the sterilisation of mineral resources? (6.5)	<ul style="list-style-type: none"> • Number of minerals sites safeguarded for extraction.
...provide access to training, skills development and lifelong learning to meet identified needs? (6.6)	<ul style="list-style-type: none"> • Section 106 funds collected and held (AMR) • Educational attainment and skills (AMR)

8 Conclusions and Next Steps

Conclusion

- 8.1 The Welwyn Hatfield Proposed Submission Local Plan has been long in its gestation. Work originally commenced nearly ten years ago when Regional Spatial Strategies were in place to guide development at the local planning authority level, although the part of the East of England Plan that applied to Welwyn Hatfield Borough was removed from the East of England Plan following a court judgement.
- 8.2 Since then, Regional Spatial Strategies have been revoked and the suite of detailed national Planning Policy Guidance has been replaced by a streamlined National Planning Policy Framework. Separate Core Strategies, Site Allocations, and Development Management policy documents are now being replaced by single Local Plans. It is now for local planning authorities to decide, through detailed studies, how much growth is required to accommodate a rising resident population and increasing numbers of jobs. In doing so, local planning authorities are required to liaise with neighbouring authorities and other stakeholders through the Duty to Cooperate. Of critical importance is for local planning authorities to plan for objectively assessed housing and employment land needs, and to demonstrate that they have a five year supply of housing land.
- 8.3 The Local Plan preparation process is inevitably controversial, because it has the potential to affect everybody's lives in the area concerned. For those who own a home and have a job, the concern is often about over-development and in a local authority such as Welwyn Hatfield, loss of Green Belt land. For those who don't have their own home or a job, their primary concern may well be to have such opportunities afforded to them, with houses they can afford, and a range of jobs available to suit people with different skills, qualifications and experience.
- 8.4 Nearly everybody is concerned to maintain their quality of life, and in particular the character of the towns and villages in which they have chosen to live, and the surrounding countryside which provides a welcome antidote from everyday stresses and strains. At the same time, communities need essential services and facilities, such as shops, hospitals and health centres, schools and play areas, sports and leisure facilities, as well as supporting infrastructure such as water supply and waste water treatment, roads and energy.
- 8.5 There is also a responsibility on us now to think of future generations, and to allow reminders of the past. To be sustainable, development needs to take respect our landscapes, biodiversity, heritage and our best agricultural land, and we need to make sure that we do not generate unnecessary pollution or contributions to climate change, which in the longer term is the biggest threat of all.
- 8.6 It is within this challenging context that Welwyn Hatfield Council has had to prepare its Proposed Submission Local Plan. It is not an easy task, and in many ways it is not surprising that it has taken as long as it has, given the challenges involved. This is particularly the case given the close network of towns that characterise all districts and boroughs in Hertfordshire with no-one obvious centre upon which the county is focused, and with the substantial influence of London to the south.
- 8.7 The Sustainability Appraisal has been an integral component of the Local Plan preparation process. The local planning authority officers and the consultants from LUC have worked closely together throughout, with the same senior members of both teams involved from start to finish. This has enabled a very good understanding of Welwyn Hatfield to be gained by those carrying out the SA, and a good understanding of the benefit of SA by those preparing the Local Plan.
- 8.8 At every stage of the planning process, different options have been tested through SA, whether the scale of growth, the distribution of development and individual sites, or the policy criteria that should apply to the delivery of development. The SA has been there to help those with

responsibility for making decisions weigh up the choices – the SA Reports have always been made available to Council members alongside Local Plan consultation documents. It has also been available for the public to use and challenge, and the SA has reflected consultation comments in the process. The SA has been undertaken objectively and independently using the available evidence.

- 8.9 The result is a Proposed Submission Local Plan that has undergone thorough testing. To accommodate an increase in population of more than 20% over the Local Plan period inevitably requires difficult decisions that will not be welcomed by all. It necessarily requires release of Green Belt land and the creation of new strategic growth locations on the edge of the two main towns of Welwyn Garden City and Hatfield. It would be impossible to deliver the development needed without these. Alternative growth locations have been fully tested through the SA and, , none that have a good prospect of delivery perform more strongly against the SA objectives taken as a whole than those included in the Proposed Submission Local Plan.
- 8.10 The SA was instrumental in challenging the highly concentrated approach to development set out in the Emerging Core Strategy, and questioned whether this approach would really meet the needs of the villages in the Borough, including the shops and services they contain. The result is a more a proportionate approach in the Proposed Submission Local Plan, with the majority of development quite rightly in sustainability terms being focused on the two main towns, but with a larger proportion of development provided in the villages excluded from the Green Belt, which should provide for a more balanced pattern of development. The Proposed Submission Local Plan also includes a proposal for a new village at Symondshyde, which provides an opportunity for innovative approaches to addressing the challenge of accommodating the objectively assessed need, but one that reflects the heritage of new settlement planning of the Borough. The size of the village will not be big enough to be self-contained, and therefore its links with the two main towns will be important, but it will take pressure off ever-increasing the size of Welwyn Garden City and Hatfield. It is also of concern that the site of the village has been assessed as being in a location of high landscape sensitivity.
- 8.11 The Welwyn Hatfield Local Plan will give rise to a range of significant positive effects, for example with respect to meeting housing need and employment land, with provision for house building rates well in excess of recent housing delivery. Despite this, the Proposed Submission Local Plan still falls a little short in terms of the amount of housing indicated as being needed in the Strategic Housing Market Assessment Partial Update Addendum and also in the floorspace required for offices, industry and warehousing included in the Economy Study Update, although provision for employment land and growth in jobs should be met.
- 8.12 There will undoubtedly be impacts on the landscape, and potentially biodiversity, and there will be more traffic, and increased strains on services and facilities, such as schools, and on utilities such as water, but the Local Plan recognises this, and includes policies to ensure that development is well designed, respecting the character of the built heritage of the Borough, as sustainable as can reasonably be expected, and that any adverse effects are mitigated through contributions to enhanced existing or new services, and to open space and biodiversity. It aims to make sure that development is well located by walking, cycling and public transport without the need to use a car.
- 8.13 In summary, the Welwyn Hatfield Proposed Submission Local Plan is an ambitious plan that seeks a step change in growth to accommodate identified need. This will be achieved through significant amounts of development, met through a combination of urban capacity sites, strategic extensions to Welwyn Garden City and Hatfield, smaller although in some instances still quite sizeable extensions to some of the villages excluded from the Green Belt, a new village and an allowance for windfall development. The Proposed Submission Local Plan puts in place policy safeguards to mitigate the effects on the environment, and to ensure that the supporting infrastructure is delivered alongside the development. People will notice changes to Welwyn Hatfield as a result, but the true test is time. In the same way that the existing towns and villages have become an integral part of the communities and landscape of this part of Hertfordshire, each with their own character and identity, so this will evolve over the plan period and beyond.

Next steps

- 8.14 This SA Report will be available for consultation alongside the Proposed Submission Local Plan between August and October 2016.
- 8.15 Following this consultation, the Proposed Submission Local Plan and accompanying SA Report will be submitted to the Secretary of State for public examination, along with consultation responses received on the soundness of the Proposed Submission Local Plan.
- 8.16 Any proposed modifications to the Proposed Submission Local Plan arising out of this process may require SA, which will be consulted upon as necessary.

LUC
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