

# **Welwyn Hatfield Local Plan**

## **Employment Site Selection Background Paper 2016**

**June 2016**



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## 1. Introduction

- 1.1 The Council's Local Plan must seek to deliver sustainable development and be based on a sound evidence base.
- 1.2 The primary aim of this Employment Sites Selection Background Paper is to bring together key conclusions arising from the following strands of evidence and appraisals:
  - The Housing and Employment Land Availability Assessment (HELAA);
  - The Green Belt Study Review (Parts 1 and 2)
  - An appraisal of Green Belt boundaries
  - The Sustainability Appraisal
  - Flood Risk – Sequential Test; and
  - An appraisal of strategic advantages or disadvantages.
- 1.3 This Background Paper balances the key findings from the above and assesses whether sites should be considered for allocation in the Local Plan.
- 1.4 In doing so, consideration is given, where relevant, to any cumulative impacts, which may affect whether or not a site, or a group of sites, should go forward to allocation.
- 1.5 Consideration is also given to the key policy implications that would arise if a site were to be allocated.
- 1.6 Site level findings are also weighed against any known infrastructure constraints on a settlement basis.
- 1.7 It is important to note that the content of this Background Paper is proportionate to the task of informing the allocation of sites in a Local Plan. This means that whilst many issues have been considered, the Background Paper does not go to the level of detail expected with a planning application.
- 1.8 This Background Paper will be used to inform the Council's decisions on the most suitable sites to be allocated in the Local Plan.
- 1.9 It should also be noted that this Background Paper reflects circumstances as they are understood at this particular point in time. Going forward, it is possible that new information may become available that would lead the Council to a different understanding of the development potential of a site or group of sites.

## 2. Spatial Context

- 2.1 Welwyn Hatfield borough is located centrally within Hertfordshire and covers an area of approximately 130 square kilometres. It is bordered by Hertsmere to the southwest, St Albans to the west, North Hertfordshire to the north and East Hertfordshire and Broxbourne to the east. The south of the borough borders the London Borough of Enfield. The borough has two main towns, Welwyn Garden City and Hatfield. Both are new towns and Welwyn Garden City is one of two garden cities in the UK. There are also a number of smaller settlements, which are excluded from the Green Belt - Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands and Mardley Heath, Welham Green, Welwyn and Woolmer Green. The borough also contains a number of small villages, hamlets and areas of sporadic or ribbon development, which are all located in the Green Belt.
- 2.2 The borough has good rail and road links, with the A1(M) passing through the borough, connecting with the M25 to the south. The east coast mainline railway runs through the borough with stations on this line at Brookmans Park, Welham Green, Hatfield, Welwyn Garden City and Welwyn North (located in the village of Digswell). Cuffley also has a station on the Hertford Loop Line, which runs from London to Stevenage via Hertford North.

**Figure 1: Welwyn Hatfield Borough**



### **3. National Policy Context**

- 3.1 To help achieve economic growth, the National Planning Policy Framework (NPPF) requires local planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century. The NPPF expects local authorities, in drawing up local plans to positively and proactively encourage economic growth by identifying strategic sites for local and inward investment to meet anticipated needs over the plan period.
- 3.2 Planning for employment growth and developing the county's inward investment offer also reflects the priorities and objectives of the Hertfordshire Local Enterprise Partnership (LEP).

### **4. Employment Growth**

- 4.1 The Council's evidence, set out in the Welwyn Hatfield Economy Study Update, December 2015, considered three different scenarios for job growth from 2013 to 2032. The scenario based on Experian employment projections forecast an increase of 15,960 total jobs. The East of England Forecasting Model (EEFM)-based scenario forecast an increase of 17,900 total jobs. So this suggests the need to plan for a range 15,960 to 17,900 total jobs from 2013 to 2032. There were significant differences in the structural make-up of the jobs growth figures for each of these scenarios with the Experian-based scenario predicting a substantially higher proportion of the growth would be in Class B8 (storage and distribution) than the EEFM-based scenario. Because it was difficult to predict which of these two scenarios would provide a more accurate projection of future changes, the Study recommended that a hybrid scenario be adopted taking the mean of the Experian- and EEFM-based scenarios. The hybrid scenario gives a total jobs growth figure of 16,900, but with a smaller land and floorspace requirements than the Experian scenario.
- 4.2 The hybrid scenario would require an increase in floorspace for offices, industry and warehousing of 138,000 square metres. Since 2013, substantial amounts of Class B floorspace have been allowed through the permitted development right enabling offices to be converted to residential without planning permission, with losses likely to continue. Although there is some new supply, it is only possible to plan for about 116,400 square metres of additional Class B floorspace from 2013 to 2032, assuming that the borough's best resources of existing office space have been protected, by the use of Article 4 Directions, from conversion to residential uses. Theoretically, this would constrain total jobs growth to 14,500 over the plan period. However, it is notable that provisional government estimates (Business Register and Employment Survey, Office for National Statistics, 2014 and 2015) indicate that the number of jobs in Welwyn Hatfield increased by 2,600 from 2013 to 2014. Adding the likely total number of jobs that could be accommodated in the supply of employment floorspace to the number of jobs that have already been created since 2013 gives a total jobs growth of about 16,800, which is very similar to the 16,900 total jobs figure recommended in the Economy Study Update.

- 4.3 Using this total jobs figure as a starting point, and taking into account the supply of employment land from existing designated employment areas, the council's evidence indicates that, by 2032, there would be a shortfall of 5.4ha of land for Class B uses if new sites are not identified.

## **5. Local Policy Context**

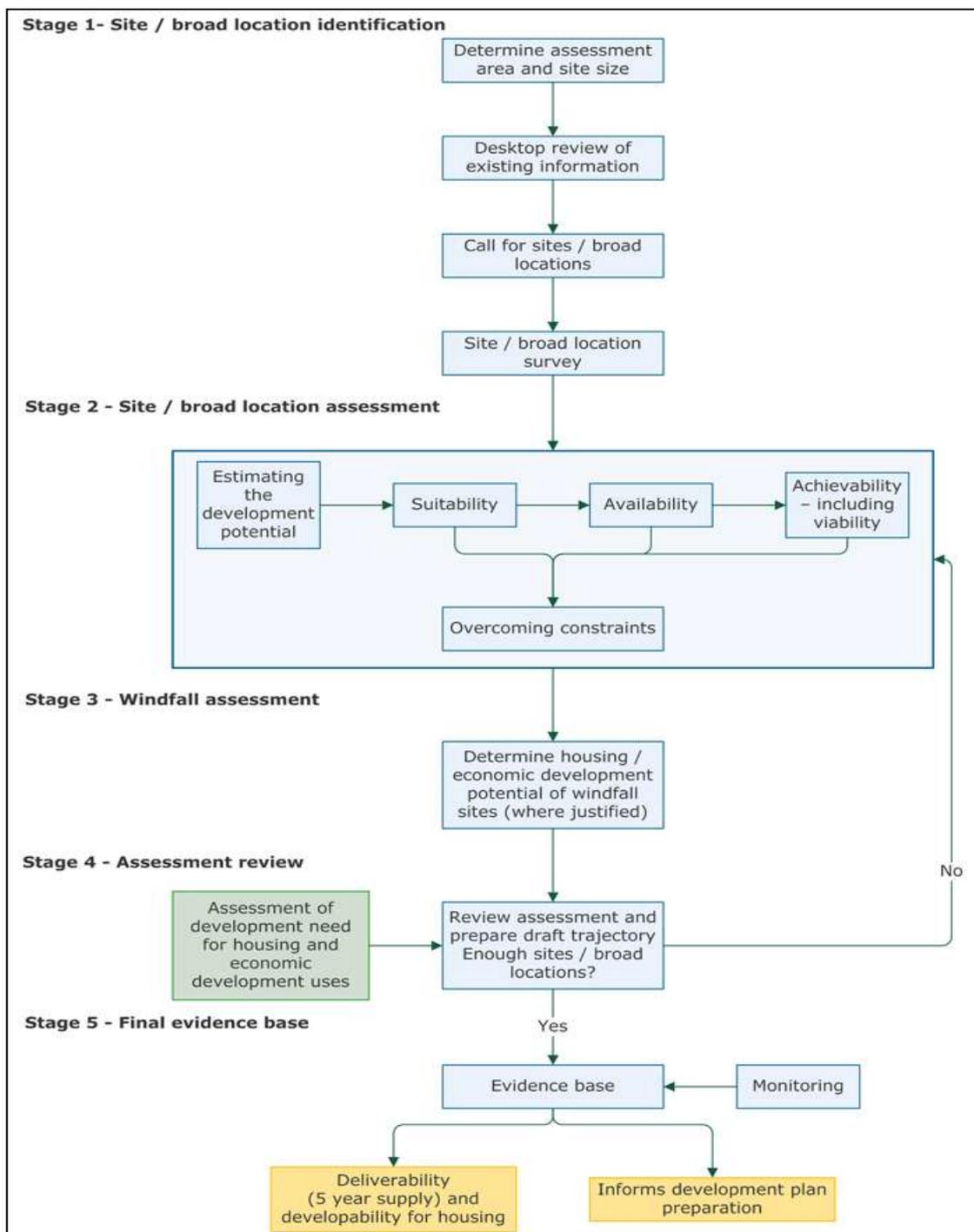
- 5.1 The Council is currently updating its local planning policy. From 12<sup>th</sup> November 2012 to 31<sup>st</sup> January 2013, the Council consulted on its Emerging Core Strategy.
- 5.2 The Emerging Core Strategy set out the Plan's emerging strategic policies. A key strategic policy of the Local Plan will be to deliver a sustainable pattern of development; applying a set of overarching principles including planning positively for growth in a manner which minimises the need to travel by directing growth towards those areas with good transport networks and which are well served by jobs, services and facilities; protecting areas of highest environmental value and avoiding areas of high flood risk.
- 5.3 In April 2014 the Council decided to move away from the production of a series of separate development plan documents (Core Strategy, Site Allocations and Development Management policies) in favour of producing a combined Local Plan. A draft of the Local Plan was published for consultation in early 2015, which identified sites around all the borough's excluded settlements (towns and villages).
- 5.4 A number of new or amended sites were submitted too late to be included in the Local Plan Consultation 2015, or were submitted in response to that consultation, or were submitted subsequently up until August 2015, and these have been assessed in the HELAA 2016. Two events were held to publicise the promotion of these new sites.
- 5.5 This Site Selection Background Paper will inform the production of the Local Plan Proposed Submission 2016.

## 6. Methodology

### Planning Practice Guidance (PPG)

- 6.1 Guidance on Housing and Economic Land Availability Assessments is set out in national PPG. The Welwyn Hatfield HELAA reports on stages 1 to 3 of the methodology as set out in the flow chart below.

**Figure 2: Methodology flowchart – extract from national Planning Practice Guidance on Housing and Economic Land Availability Assessments**



- 6.2 The HELAA also forms part of stage 4 (Assessment Review). However, at this stage, and in order to inform the Council's decision on what sites should be selected for allocation in the Local Plan, the Council has also considered other strands of evidence or appraisals.
- 6.3 These additional strands are:
- The Green Belt Study Review (Parts 1 and 2);
  - An appraisal of Green Belt boundaries;
  - The Sustainability Appraisal;
  - Flood Risk – Sequential Test; and
  - An appraisal of strategic advantages or disadvantages.
  - Planning permissions
- 6.4 It should be noted that Green Belt and other considerations such as Landscape Capacity and Sensitivity and infrastructure constraints, were previously set out in the 2014 Strategic Housing Land Availability Assessment (SHLAA) but the Council received a number of representations in response to the Local Plan Consultation 2015 that greater clarity would be welcomed in explaining why sites were considered more favourable than others.
- 6.5 Responding to such comments, matters such as the contribution that sites make to the purposes of the Green Belt and Landscape Capacity and Sensitivity (which is dealt with in the Sustainability Appraisal) have been removed from the HELAA 2016 (the updated version of the 2014 SHLAA) and included in this Background Paper.
- 6.6 This Background Paper sets out how the key findings from all the above have been weighted and balanced on a site by site basis and indicates whether sites should be considered for allocation.
- 6.7 Consideration is also given, where relevant, to any cumulative impacts or reasons, which may affect whether or not a site, or a group of sites, goes forward to allocation.
- 6.8 Site level findings are also weighed against any known infrastructure constraints on a settlement basis.
- 6.9 Consideration is given to the key policy implications that would arise if a site were to be allocated.
- 6.10 The potential capacity of sites is reported.
- 6.11 Findings are presented on a settlement by settlement basis (or rural areas as appropriate) in the main body of this Paper. The appendices set out templates for the sites considered at this stage.

## 7. Strands of Evidence and Appraisals

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

- 7.1 The Welwyn Hatfield HELAA 2016 considers a large number of sites that have put forward for development at various stages of the plan making process. This includes sites that were:
- Previously put forward (but not allocated) as part of the District Plan Public Inquiry which was held in 2003;
  - Within potential Broad Locations identified in the Core Strategy Issues and Options 2009 document; or as more defined in the Emerging Core Strategy and Land for Housing Outside Urban Areas consultation in 2012;
  - Promoted through the original call for sites in 2007 or as suggested by the Council's consultants at that time; or
  - Subsequently promoted either through a consultation event such as the Local Plan Consultation 2015 or direct to the Council at any time until August 2015
- 7.2 The HELAA 2016 can be found on the Council's website<sup>1</sup>.
- 7.3 The Council has published various versions of the Strategic Housing Land Availability Assessment (SHLAA): SHLAA Phase 1 (Urban Capacity) 2009; SHLAA Phase 2 (Sites Outside Urban Areas) 2012; SHLAA Phase 3 (Potential for Windfall Development) 2012. A review of the Phase 1 SHLAA (Urban Capacity) was published in December 2013 and a further review of the Phase 1 SHLAA was published in November 2014, reflecting the continuing submission of additional sites. An update of the Stage 3 SHLAA (Windfall) was published in November 2014 and an update of the Stage 2 SHLAA (Sites outside Urban Areas) was published in December 2014. In 2016, the Council brought together all three strands of the SHLAA (urban sites, land outside urban areas and windfall potential) into one comprehensive document; the Housing and Economic Land Availability Assessment (HELAA) 2016.
- 7.4 A sieving process is used in the HELAA to decide whether or not a site is considered unsuitable for allocation. Sites are considered unsuitable at the first stage of sieving because (in summary) they are subject to a key policy or environmental constraint (such as a wildlife or heritage asset), because all of a site is located within flood zone 3, or because there is a significant physical barrier to development (for example, no suitable access). The HELAA 2016 explains this in greater detail.
- 7.5 Sites that are not contiguous with an urban settlement boundary or where the opportunity does not exist to redefine Green Belt boundaries are also sieved out at the first stage of assessment as they would not direct growth to the most sustainable locations within the borough consistent with the objectives of the NPPF. This means that sites located within remote rural areas, or in villages that are washed over by the Green Belt are not carried forward to the second stage of assessment in the HELAA.

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<sup>1</sup> HELAA 2016: <http://www.welhat.gov.uk/article/5501/Housing>

- 7.6 The exception to this is if sites are large enough to create a sustainable new settlement or in the case of Gypsy and Traveller sites, as national planning policy allows such sites to be inset within the Green Belt and these do not necessarily need to adjoin an existing urban boundary in order to be considered suitable for allocation.
- 7.7 The second stage of HELAA assessment considers whether sites are suitable, available and achievable. Eight sites are considered in this Background Paper.

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

- 7.8 The Stage 1 Green Belt Review (November 2013) is a Strategic Review of the Green Belt, jointly commissioned by Welwyn Hatfield, St Albans and Dacorum Borough and District councils. It provides an assessment of how land in the Green Belt in these local authority areas, contributes to national and local purposes of including land within the Green Belt. It classifies settlements into three tiers; primary settlements/towns are defined as 1<sup>st</sup> tier, secondary settlements/large villages are categorised as 2<sup>nd</sup> tier, and other settlements/small villages within the Green Belt are categorised as 3<sup>rd</sup> tier.
- 7.9 For Welwyn Hatfield, 1<sup>st</sup> tier settlements are Welwyn Garden City and Hatfield, 2<sup>nd</sup> tier settlements are the eight excluded villages (Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands and Mardley Heath, Welham Green, Welwyn and Woolmer Green). 3<sup>rd</sup> tier settlements include the smaller Green belt villages of Essendon, Lemsford, Newgate Street and Northaw as well as the smaller hamlets and areas of ribbon development which are all located within the Green Belt.
- 7.10 The Review considered four of the national purposes of including land within the Green Belt as set out in the National Planning Policy Framework (NPPF):
- To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns from merging into one another;
  - To assist in safeguarding the countryside from encroachment; and
  - To preserve the setting and special character of historic towns.
- 7.11 The fifth purpose (to assist urban regeneration) was screened out as it was already apparent at the time of the Green Belt Review that there was a limited supply of available or unallocated brownfield land in the three local authority areas and that, hitherto, the Green Belt had served a successful purpose. All parcels of land within the Green Belt Review were therefore considered to perform equally well against this purpose and any attempt to differentiate was considered to be meaningless.
- 7.12 In addition to preventing towns merging (one of the NPPF purposes), the Green Belt has also been successful in maintaining the existing settlement pattern within Hertfordshire by providing a range of spaces and gaps between villages and towns and between villages, preventing them from merging into one another.
- 7.13 In addition to preventing towns merging (one of the NPPF purposes), the Green Belt has also been successful in maintaining the existing settlement pattern within Hertfordshire by providing a range of spaces and gaps between

villages and towns and between villages, preventing them from merging into one another.

- 7.14 The Hertfordshire Structure Plan Review 1991-2011 (paragraph 118) established a strategy that sought to broadly maintain the general settlement pattern in Hertfordshire, concentrating development within the main urban areas which were listed in Policy 6.
- 7.15 *To maintain the existing settlement pattern* is still considered relevant and the Green Belt Study Stage 1, also assesses the contribution that land makes to this Local Purpose.
- 7.16 For the purposes of the Stage 1 Review, the Green Belt was subdivided into 66 strategic parcels of land. All parcels were then assessed against each of the four national Green Belt purposes and the local Green Belt purpose. The assessment classified the contribution that each parcel makes as: a significant contribution; a partial contribution; or limited or no contribution.
- 7.17 Assessments also considered at a strategic level the existing level of built development in the Green Belt, visual openness and countryside character.
- 7.18 The Stage 1 Green Belt Review 2013 can be found on the website<sup>2</sup>. Parcels GB34, 35, 36, 41, 42, 43A, 43B, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59 and 60 are the parcels assessed in Annex 1.3 for Welwyn Hatfield.

### **Green Belt Review Stage 2**

- 7.19 The Stage 2 Green Belt Review (October 2014) brought together key findings of the Stage 1 Green Belt Review with site level assessments of sites identified in the SHLAA and the Gypsy and Traveller Land Availability Assessment. It considered the contribution that each site makes towards the four national Green Belt purposes and one local Green Belt purpose. A similar classification was used to the Stage 1 assessment so that levels of contribution have been classified as either 'significant', 'partial' or 'limited or no'.
- 7.20 An initial assessment was also made of site boundaries. However, the strength of the existing Green Belt boundary was not considered and the Stage 2 Review acknowledged that a more detailed boundary assessment would need to be undertaken. The Stage 2 Green Belt Review (October 2014) can be found on the website<sup>3</sup>

### **Green Belt Boundaries**

- 7.21 As part of the Site Selection process, an appraisal was made of Green Belt boundaries comparing, on a site by site basis, the relative strength of existing and proposed boundaries. The strength of each boundary was considered on the following basis:

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<sup>2</sup> Green Belt Review Stage 1 November 2013: <http://www.welhat.gov.uk/article/5488/Green-Belt-Review>

<sup>3</sup> Stage 2 Green Belt Review (October 2014): <http://www.welhat.gov.uk/greenbeltreviewstage2>

**Table 1: Strength of Green Belt boundaries**

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

7.22 The Site Selection process also considered if a site fell within a fragile gap of around 1km between settlements (towns to towns, villages to villages or villages to towns) and if so, whether a site would have a marginal or significant effect on such a fragile gap.

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

7.23 The Council is required to consider wider social, environmental and economic effects when preparing plans and it is a legal requirement for local plans to be subject to SA and SEA throughout their preparation. The Council has commissioned specialist consultants to undertake a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan. An SA Report has informed each stage of Local Plan preparation, setting out the potential sustainability effects of sites and policies for inclusion in the Welwyn Hatfield Local Plan. The SA Report also reports on the summary conclusions of the Habitat Regulations Assessment.

7.24 The SA methodology appraises sites and policy intentions against 6 long-term SA objectives (health improvement; safe communities; good citizenship; improving the environment; decent housing; and a thriving economy) and a set of 22 associated sub-objectives. Scores are attributed in the SA to each of the sub-objectives indicating the likely sustainability effects as follows:

**Table 2: Sustainability Appraisal scoring**

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

- 7.25 Sites that have been referred to in earlier stages of consultation have already been subject to sustainability appraisal. A number of new or amended sites were submitted too late to be included within, in response to, or subsequent to the Local Plan Consultation 2015. These have been assessed in the HELAA 2016 and where sites have passed the Stage 1 sieving process and are considered in the HELAA to be suitable, available and achievable. These sites have also been subject to SA.
- 7.26 The SA will however, need to be reviewed to consider policies in the Local Plan Proposed Submission version. As a result, some SA scores may need to be reviewed and amended as appropriate. Therefore the reference to the SA in this Sites Selection Background Paper should be viewed as an interim position as part of the iterative process of carrying out the SA.

## **Flood Risk**

- 7.27 As part of the preparation of the Local Plan, the Council commissioned Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2. Published in December 2015 (and amended in May 2016), this updates and replaces the 2009 SFRA. The 2015 study assesses flood risk from all types of flooding in the borough, taking into account climate change, in line with current national policy and guidance. The Level 2 SFRA assesses flood risk associated with a number of specified sites in more detail.
- 7.28 The SFRA can be found on the website<sup>4</sup>.
- 7.29 Where part of a site falls within Flood Zones 2, 3a or 3b, and a sequential approach to layout that restricts development to Flood Zone 1 within a site is feasible, the site passes the Sequential Test and an Exception Test does not need to be applied.
- 7.30 All sites in this Background Paper pass the sequential test.

## **Strategic Advantages or Disadvantages**

- 7.31 Consideration is also given to whether there are any strategic advantages or disadvantages that may set a particular site apart from other sites, e.g. the on-site or associated off-site provision (or loss) of community or other infrastructure that would not otherwise be provided on other sites.

## **Strategic infrastructure and cumulative impacts**

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

## **Indicative site capacities**

- 7.33 Indicative site capacities are based on evidence that is proportionate to a strategic level assessment carried out as part of the plan making process.
- 7.34 A relatively cautious approach has generally been applied in light of known constraints and whilst the approach taken is considered to have resulted in a robust measure, these are not intended to be definitive. Once planning applications are received, it should be noted that the indicative capacities may vary slightly (either upwards or downwards).

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<sup>4</sup> SFRA December 2015: <http://www.welhat.gov.uk/article/5503/Environment-and-Climate-Change>

## **8. Weighting**

- 8.1 Appendices A-D contain an assessment of each of the sites considered in this paper. Each site is considered in light of:
- The HELAA;
  - The Green Belt Review Stages 1 and 2;
  - An appraisal of Green Belt boundaries;
  - The Sustainability Appraisal (significant positive and negative effects);
  - Flood Risk; and
  - Strategic Advantages and Disadvantages.
- 8.2 Where relevant, weighting is applied to each of part of the assessment and a summary conclusion is provided at the end of each assessment table together with any policy implications should the site be allocated.
- 8.3 The following sections describe how weightings have been applied. Variations may be applicable on a site by site basis, where the circumstances of a particular site vary slightly from the general weighting definitions. These should therefore be viewed as a set of guidelines for weighting purposes to aid decision making and not definitive in description.

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

- 8.4 The HELAA involves a thorough strategic level assessment of whether a site is considered suitable, available and achievable during the plan period. Only sites that are considered suitable in the HELAA have been included in this Site Selection Background Paper (if they are considered unsuitable, then the HELAA sets out the reasons why this conclusion has been reached).
- 8.5 Many sites have a number of constraints that need to be overcome before development can proceed. The HELAA considers whether such constraints can be overcome, whether constraints may reduce or limit the quantum of development in any way, whether any further assessments may need to be carried out either before or in association with a planning application and whether such constraints may affect achievability.
- 8.6 Having considered all of this, the HELAA concludes whether or not, even with the acknowledged constraints, development is considered to be achievable and if so, at what point in the plan period are sites likely to be delivered. So, if for example there are infrastructure constraints which require a lead-in time in advance of development taking place, this is taken into account in the HELAA.
- 8.7 The delivery estimate is therefore a key conclusion as it takes into account known constraints. All sites where there is a reasonable prospect of delivery within the plan period have a positive weight afforded to them. Sites that have greater certainty, and are expected to be delivered in the early to mid-parts of the plan period are given a more favourable weighting than sites that carry a degree of uncertainty (due to the need to overcome noted constraints) and are not expected to come forward until the later part of the plan period or beyond the plan period.

**Table 3: HELAA weighting**

<b>Delivery timeframe</b> (from plan adoption of plan)	<b>Weighting</b>
0-5 years	Significant in favour
0-10 years	Moderate in favour
6-10 years	Moderate in favour
11-15 years	Minor in Favour
16 + years	Minor against

### **Green Belt Study Review Stages 1 and 2**

- 8.8 Greater weight is afforded to the contribution a site makes to national Green Belt purposes in recognition of the importance afforded to them by the NPPF. However, recognition is also given to the local Green Belt purpose where a site makes a significant or partial contribution to maintaining settlement pattern; providing gaps between smaller settlements and preventing coalescence.

**Table 4: Contribution to Green Belt purposes weighting**

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

### **Green Belt Boundaries**

- 8.9 Consistent with the NPPF, account has been taken of the need to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. A comparison has also been made with the strength of the existing Green Belt boundary. The weighting applied is as follows.

**Table 5: Green Belt boundary weighting**

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

- 8.10 Some sites also fall within an existing fragile gap (defined in this Background Paper as being less than 1km). In these instances the impact on the reduction in the gap as a result of a site forming a new Green Belt boundary has also been considered.
- 8.11 Greater weight has been given to the impact on a fragile gap between 1<sup>st</sup> tier settlements (towns to towns) than to the impact on a fragile gap between villages and villages or villages to towns, reflecting the importance afforded by the NPPF to preventing neighbouring towns from merging into one another.
- 8.12 Where sites fall within a fragile gap, weighting has been applied as follows.

**Table 6: Green Belt boundary weighting where sites fall within a Fragile Gap**

Fragile gap	Weighting
Site would marginally reduce an existing fragile gap between towns and villages (1 <sup>st</sup> tier to 2 <sup>nd</sup> or 3 <sup>rd</sup> tier settlements) or villages to villages (2 <sup>nd</sup> or 3 <sup>rd</sup> tier settlements)	Minor against
Site would marginally reduce an existing fragile gap between towns (1 <sup>st</sup> tier settlements), or significantly reduce an existing fragile gap between towns and villages (1 <sup>st</sup> tier to 2 <sup>nd</sup> or 3 <sup>rd</sup> tier settlements) or villages to villages (2 <sup>nd</sup> or 3 <sup>rd</sup> tier settlements)	Moderate against
Site would significantly reduce an existing fragile gap between 1 <sup>st</sup> tier settlements (towns to towns)	Significant against

### **Sustainability Appraisal**

- 8.13 The Sustainability Appraisal (SA) attributes scores to a set of 22 sub-objectives, such as avoiding or reducing air pollution (4.3), protecting and enhancing open space and landscape character, retaining local distinctiveness (4.4) etc. The SA indicates the likely sustainability effects on each sub-objective and whether any mitigation may be required.
- 8.14 It is not the place of the Site Selection process to revisit any of those scores but the Site Selection process does take the balance of scores into account.
- 8.15 For the purposes of Site Selection, weight has been given to the relative balance between the significant positive and significant negative effects associated with the SA assessment of each site. The SA of course identifies a wide range of other potential effects, minor positive/negative etc but it is the most significant effects that are considered in this paper.

**Table 7: Sustainability Appraisal – weighting of significant positive and negative effects**

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

### **Flood Risk**

- 8.16 Development potential has been excluded from areas Flood Zones 2 and 3. All of the sites in this Background Paper pass the Sequential Test, and as a result no weighting is given in the Site Selection process to any one site over another as they are all equal in this respect.
- 8.17 However, note may be made on a site by site basis where certain measures or further assessments may be considered appropriate.

### **Strategic Advantages or Disadvantages**

- 8.18 This section considers whether a site is likely to result in any strategic advantages that would not normally be delivered on other (e.g. smaller) sites.
- 8.19 For example, a site may present the opportunity to deliver important community infrastructure such as a secondary or primary school, strategic Green Infrastructure that forms part of a strategic planned network of sites, or a large or small neighbourhood centre, which can only be delivered in association with a significant level of growth. Without such sites, essential community infrastructure is unlikely to be delivered alongside growth in the borough and this is considered important to take into account. Alternatively, a site may provide an opportunity to deliver employment floor space to contribute towards the borough's economic growth strategy or make a direct contribution towards regeneration priorities.
- 8.20 A site may also provide an opportunity to provide enhanced facilities for an adjoining community use. However, whilst these may be viewed as a wider community benefit (beyond what is absolutely necessary for a development to be considered suitable in principle), they are unlikely to be essential to the overall delivery of growth in the borough and are afforded less weight than the need to deliver strategic infrastructure alongside growth in the interests of sustainable development.
- 8.21 Conversely, this part of the Site Selection process notes if the development of certain sites may result in any strategic disadvantages, such as the loss of existing community or other infrastructure, with or without an opportunity for replacement during the plan period.
- 8.22 The greater the strategic advantage or disadvantage, the greater the weight is afforded along the following lines.

**Table 8: Strategic advantages or disadvantages weighting**

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

### **Vacant Sites, Planning Permissions and Completions since 1<sup>st</sup> April 2013**

8.23 It is estimated that outstanding planning permissions for Class B uses in the borough have a total floorspace of 70,100 square metres. Completions since 1<sup>st</sup> April 2013 have provided a further 25,300 square metres and vacant sites at Shire Park and Chequersfield provide a further supply of approximately 29,600 square metres. This means that the total supply of floorspace excluding development sites is 125,000 square metres.

## 9. Settlement conclusions - Welwyn Garden City

### Key Infrastructure issues

- 9.1 There are no key infrastructure issues relating directly to the selection of sites for employment in Welwyn Garden City.

### Site Conclusions

- 9.2 Conclusions for sites in Welwyn Garden City are set out at Appendix A. These are in addition to individual site assessments contained in the HELAA.

### Urban sites

- 9.3 The following urban sites in Welwyn Garden City are considered suitable for allocation in the Local Plan.

**Table 9: Welwyn Garden City - Urban sites considered suitable for allocation in the Local Plan**

Site Ref	Site name	Indicative capacity (sq.m)
Pea02b	Broadwater Road West SPD Site (North)	17,700
Pea02c	Broadwater Road West SPD Site (West)	
<b>Total</b>		<b>17,700</b>

### Green Belt sites

- 9.4 The following Green Belt sites around Welwyn Garden City are considered suitable for allocation in the Local Plan because they already have planning permission or have been referred to the Secretary of State as a departure from Local Plan policy.

**Table 10: Welwyn Garden City – Green Belt sites considered suitable for allocation in the Local Plan**

Site Ref	Site name	Indicative capacity
WGC3 + Allocated Waste Site AS008	Cole Green Lane	5,200 (from WGC3 – the rest of the site is already in use)
<b>Total</b>		<b>5,200</b>

### Settlement Conclusion

- 9.5 Total potential capacity from urban and Green Belt sites is **22,900 square metres**.

## 10. Settlement conclusions - Hatfield

### Key Infrastructure issues

- 10.1 **Highways:** A high level growth scenario within the plan period, including Strategic Development Sites Hat1, Hat2 and Hat15 indicates that there will be impacts such as increased queuing at Junction 4 of the A1(M), and nearby junctions. However, Hertfordshire County Council as the highways authority advises that whilst forecast congestion at Junction 4 of the A1(M) would not be classed as a 'showstopper' at this stage, further work will need to be carried out to define mitigation schemes. At present, it is clear that housing from the Hat1, Hat2 and Hat15 sites would add additional pressure on the road network and whilst congestion could be eased to an extent with mitigation, it would be worse than at present. It is too early to say without further modelling if the residual impact of all three sites with appropriate mitigation would be acceptable but if there were other planning reasons for delivering one of the sites (most likely Hat2) later in the plan period (or beyond), this would provide additional time to consider the constraints in this location further and to drive a modal shift agenda.
- 10.2 **Utilities:** There are no known major constraints for utilities infrastructure with the exception of the need to deliver a new 33KV sub-station north of Hatfield or to seek contributions to an upgrade at an existing electricity sub-station site.

### Site Conclusions

- 10.3 Conclusions for sites in Hatfield are set out at Appendix B. These are in addition to individual site assessments contained in the HELAA.

### Urban sites

- 10.4 No urban sites are considered suitable for allocation for employment in the Local Plan.

### Green Belt sites

- 10.5 The following site adjoining Hatfield, which is currently designated as Green Belt, is considered suitable for allocation in the Local Plan.

**Table 11: Hatfield – Green Belt sites considered suitable for allocation in the Local Plan**

Site Ref	Site name	Indicative capacity, sq.m
Hat1/13	North-west of Hatfield (incorporating Astwick Manor Farm)	Estimated 13,900
<b>Total capacity</b>		<b>Estimated 13,900</b>

- 10.6 The following site adjoining Hatfield, which is currently designated as Green Belt, is not considered suitable for allocation for employment in the Local Plan.

**Table 12: Hatfield - Green Belt sites not considered suitable for allocation for employment in the Local Plan**

Site Ref	Site name	Reason for not allocating in the Local Plan	Indicative capacity, sq.m
Hat11 Scenario 2 (employment only)	Land at Southway	The site is located within a fragile gap between Hatfield and Welham Green although the gap is already partly compromised by the presence of existing development. The site provides a strong visual and physical barrier between the two settlements and development of this site would significantly reduce the gap between settlements. On balance this, alongside the adverse impacts upon the purposes of the Green Belt, are considered to outweigh the benefits of the site.	25,000 46,900
Hat 11 Scenario 3 (mixed use)	Land at Southway		Not established
<b>Total</b>			<b>Not established</b>

### Settlement Conclusion

- 10.7 Total potential capacity from urban and Green Belt sites is an estimated **13,900 square metres**.

## 11. Settlement conclusions - Woolmer Green

### Key Infrastructure issues

- 11.1 There are no key infrastructure issues relating directly to the selection of sites for employment in Woolmer Green

### Site Conclusions

- 11.2 Conclusions for sites in Woolmer Green are set out at Appendix C.

### Urban sites

- 11.3 The following urban sites are considered suitable for allocation for employment in the Local Plan:

**Table 13: Woolmer Green - Urban sites considered suitable for allocation in the Local Plan**

Site Ref	Site name	Indicative capacity (sq.m)
WE90* + two sites on the eastern side of London Road	Woolmer Green Employment Area	Sites already in use for Class B and sui generis purposes – no net additional floorspace
<b>Total</b>		No net additional floorspace

\*This site fails Stage 1 of the HELAA as a housing site, but is already in use for employment purposes.

### Green Belt sites

- 11.4 No Green Belt sites around Woolmer Green are considered suitable for allocation in the Local Plan.
- 11.5 The following sites around Woolmer Green, which are currently designated as Green Belt, are not considered suitable for allocation for employment in the Local Plan.

**Table 14: Woolmer Green – Green Belt sites not considered suitable for employment allocation**

Site Ref	Site name	Reason for not allocating in the Local Plan	Indicative capacity / sq.m
WGr1	Land east of London Road	Because this is a mixed use site, any employment uses could only be Class B1. It is not considered that this site would be an attractive location for offices.	No floorspace defined
WGr2	South of Monread Lodge	Development of this site would significantly reduce the already fragile gap between settlements, resulting in a significant negative impact on settlement pattern and local distinctiveness. New Green Belt boundary would be weaker than existing. On balance, the significant harm to the Green Belt outweighs the benefits of the site. This site should not be considered for allocation.	6,000-11,250
Total			<b>6-11,250</b>

### Settlement Conclusion

- 11.6 No new potential employment capacity has been identified but three existing sites are considered suitable for allocation in the Local Plan so that they can be retained in employment uses.

## **12. Settlement conclusions - Oaklands and Mardley Heath**

### **Site Conclusions**

- 12.1 There are no sites listed for Oaklands and Mardley Heath as no sites were promoted for employment uses.

### **13. Settlement conclusions - Welwyn**

#### **Site Conclusions**

- 13.1 There are no sites listed for Welwyn as no sites were promoted for employment uses.

## **14. Settlement conclusions - Digswell**

### **Site Conclusions**

- 14.1 There are no sites listed for Digswell as no sites assessed in the HELAA were considered suitable for employment uses.

## 15. Settlement conclusions - Welham Green

### Key Infrastructure issues

- 15.1 Education issues are relevant to the provision of employment on this site because it is being promoted as a mixed use development including housing.
- 15.2 **Secondary Schools:** Children from Welham Green, Brookmans Park and Little Heath predominantly seek secondary school places in the Potters Bar planning area, mainly at Chancellors (in Brookmans Park). The education authority advises that feasibility is underway to review expansion potential and whilst assessment work has yet to conclude, it is expected to show that there is expansion potential at existing secondary schools in Potters Bar.
- 15.3 However, if Potters Bar schools cannot accommodate additional yield from these settlements, it may be necessary for Hatfield to accommodate further school capacity.
- 15.4 **Primary Schools:** There is one primary school in Welham Green which is a small 1 FE school and there is no opportunity to physically expand the school.
- 15.5 Limited growth of around 80 dwellings at Welham Green (in addition to GTLAA01) could be accommodated within existing schools.
- 15.6 Beyond this, additional primary school capacity will be required to address housing growth at Welham Green. The development potential on sites assessed as suitable, available and achievable in the HELAA would generate the need for around a further 1FE of primary school capacity.
- 15.7 Hertfordshire County Council as the education authority would not object to a new 2 FE primary school in Welham Green (replacing the existing primary school and increasing capacity by 1 FE) if a suitable site could be identified and delivered alongside housing growth.
- 15.8 No site has been identified in Welham Green and limited primary school capacity in Welham Green is currently a restraint on further housing growth.
- 15.9 **Highways:** The Highway Authority has identified the Dixons Hill Road/A1000 roundabout junction as a current congestion point. Capacity enhancements will be needed at this junction to enable development to take place and this is already being explored in connection with site WeG4b.

### Site Conclusions

- 15.10 Conclusions for sites in Welham Green are set out at Appendix D.

### Urban sites

- 15.11 There are no urban sites considered suitable for allocation in the Local Plan:

### Green Belt sites

- 15.12 The following site adjoining Welham Green, which is currently designated as Green Belt, is considered suitable for allocation in the Local Plan:

**Table 15: Welham Green – Green Belt sites considered suitable for allocation in the Local Plan**

<b>Site Ref</b>	<b>Site name</b>	<b>Indicative capacity (sq.m)</b>
WeG4b	Marshmoor	40,500
<b>Total</b>		<b>40,500</b>

### **Settlement Conclusion**

15.13 Total potential capacity from Green Belt sites is **40,500 square metres**.

## **16. Settlement conclusions - Brookmans Park**

### **Site Conclusions**

- 16.1 There are no sites listed for Brookmans Park as no sites were promoted for employment uses.

## **17. Settlement conclusions - Little Heath**

### **Site Conclusions**

- 17.1 There are no sites listed for Little Heath as no sites were promoted for employment uses.

## **18. Settlement conclusions - Cuffley**

### **Site Conclusions**

- 18.1 There are no sites listed for Cuffley as no sites assessed in the HELAA were considered suitable for employment uses.

## **19. Settlement conclusions - Rural Areas**

### **Key Infrastructure issues**

- 19.1 There are no key infrastructure issues relating directly to the selection of sites for employment in rural areas.

### **Site Conclusions**

- 19.2 There are no sites listed for rural areas as no sites assessed in the HELAA were considered suitable for employment uses.

