

Housing Background Paper

Part 2 Distribution Options

September 2012

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**WELWYN
HATFIELD**
BOROUGH COUNCIL



Welwyn Hatfield Borough Council

Housing Background Paper

Part 2 – Distribution Options

October 2012



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INTRODUCTION

- I Part 1 of the Housing Background Paper sets out an objective assessment of the future housing requirements for the borough. It is considered that a housing target of around 8,000 new homes for the twenty year period 2011 to 2031 would strike a positive balance between the future needs of the economy and housing growth. This is equivalent to an average completion rate of 400 dwellings per annum; **7,200 over the 18 year period 2011-2029**, i.e. continuing on from the adopted District Plan.
- II However, this is a significant level of growth that, due to insufficient opportunities within our urban areas, will require a strategic review of Green Belt boundaries in order to release land for development.
- III In order to test the deliverability of this (emerging) housing target, Part 2 of the Housing Background paper considers how the target could be delivered through alternative distribution options. Many of the alternatives explored are not considered to be reasonable options.
- IV. Two of the alternatives explored are considered to be reasonable options.
- V Whilst the Core Strategy will not allocate specific sites (as this will be carried forward through the Site Allocations development plan document or in Area Action Plans as appropriate), the assessment of the distribution options has inevitably been informed by our understanding of the availability and deliverability of suitable land in sustainable locations. As insufficient capacity for new housing exists from within our urban areas, a review of the suitability of the broad locations identified at the Issues and Options stage has taken place.
- VI The evidence relating to the availability, deliverability and suitability of sites is contained in the council's Strategic Housing Land Availability Assessment, phase 1 – sites in urban areas, and phase 2 –sites outside urban areas (the SHLAA) . Both of these documents are available to view on the council's website: <http://www.welhat.gov.uk/index.aspx?articleid=457>
- VII The Issues and Options Paper put forward the following distribution options.
 - A proportionate approach (PG31);
 - Growth focused around Welwyn Garden City (PG32a);
 - Growth focussed around Hatfield (PG32b);
 - Growth focussed around Welwyn Garden City and Hatfield ((PG32c); and
 - Growth focused around the towns and large scale expansion of one or more villages (PG39 to PG46)
- VIII A further option has subsequently been identified:
 - Growth mainly focussed on Welwyn Garden City and Hatfield with limited growth around the borough's large excluded villages.
- IX Urban capacity is a component of all of the options and is discussed in section 7 of this paper.

ALTERNATIVE DISTRIBUTION OPTIONS

1. OPTION 1: PROPORTIONATE DISTRIBUTION

1.1 This option was included in the Issues and Options Paper 2009 (option PG31). It put forward the option of housing growth being distributed towards the borough's two main towns and all the villages that are excluded from (i.e. not in) the Green Belt, on a broadly proportionate basis. The Issues and Options Paper gave an example of the scale of proportionate growth related to the size of population in each of the settlements listed. The Issues and Options Paper stated that this option would involve the use of both urban land and land currently within the Green Belt and that a Green Belt review would be triggered around most, if not all, of the following settlements:

- Welwyn Garden City, Hatfield, Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands and Mardley Heath, Welham Green, Welwyn, and Woolmer Green.

1.2 The borough's smaller villages and rural areas, which are all washed over by the Green Belt, were not included in this distribution option.

Consultation Responses

1.3 Consultation responses to the option of proportionate distribution raised the following issues:

1.4 In support of this option:

- Growth would still be focussed around Welwyn Garden City and Hatfield.
- It would widen the choice and mix of housing and provide affordable housing in areas that are currently lacking.
- It would support existing facilities and smaller more niche secondary economies in smaller towns and villages; providing new opportunities and benefits to local communities.
- It would spread infrastructure requirements.
- It would provide a choice of where, and how, people wish to live.

1.5 Against this option:

- The approach would have a disproportionate social effect on smaller communities.
- It would spread the impact of growth, rather than a few carefully selected sustainable locations.
- Whilst some large villages have shops, schools and rail access, the range of services varies between settlements and many are car dependant with limited rail and bus services.
- Smaller villages lack employment opportunities and are unsuitable for accommodating significant levels of housing.
- It would increase the extent of Green Belt review.
- An arithmetic approach related to existing population is unlikely to lead to good planning solutions.
- The approach would not necessarily lead to the most sustainable sites being identified.

1.6 Additional comments received raised the following issues:

- Options must deal with the level of detail required by national planning policy.
- An alternative option would be to examine the range of local services (existing and potential) rather than working from a population base.
- Sustainability criteria around accessibility (to services and amenities) and by means other than the car, infrastructure, environmental sensitivity, employment opportunities and local housing need should be of equal importance when allocating future growth.
- The need to consider the long-term sustainability of rural communities.
- A robust evidence base which considers a variety of factors including accessibility could be the basis of developing an option for housing distribution.
- The aim should be to improve affordability and supply of housing in all communities.
- New small villages should be created in areas where small clusters of housing already exist.

1.7 **Potential of this option to deliver the housing target:** An additional 7,200 dwellings between 2011 and 2029 would represent a 15.7% growth in the number of existing dwellings in the borough (45,850 at 2011¹). On this basis, proportionate growth in each of the settlements listed in the Issues and Options Paper 2009 (and the rest of the borough) would suggest the following targets for each settlement/area for the 18 year period 2011-2029.

Table 1: Option 1: Proportionate growth - Number and percentage of dwellings

Settlement	Proportionate growth of 15.7% - number of dwellings required (increase on existing dwelling stock)	% of growth within the borough
Welwyn Garden City	3192	44.33%
Hatfield	2058	28.58%
Brookmans Park	256	3.56%
Cuffley	317	4.40%
Digswell	105	1.46%
Little Heath	71	0.99%
Oaklands and Mardley Heath	207	2.88%
Welham Green	201	2.79%
Welwyn	240	3.33%
Woolmer Green	94	1.31%
Rest of the borough	457	6.35%
Total	7198*	100.00%

*Note: Total does not sum to 7,200 due to rounding

¹ 1. Source: Table 100 Dwelling Stock at

<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/stockincludingvacants/livetables/>

Advantages

- 1.8 It is considered that a proportionate distribution option would have a number of advantages.
- Around 73% of growth would be directed towards the borough's two main towns where development is likely to support economic growth, minimise the need to travel and provide access to jobs, services and facilities.
 - Distributing future housing development around the borough's existing urban areas (towns and excluded villages) would mean that all of these communities would contribute to meeting the borough's overall future housing requirements.
 - Each settlement would help to meet future demand for housing from newly forming households within the settlement itself, from elsewhere within the borough and from those wishing to move into the area.
 - The opportunity to deliver new housing in a number of settlements could help address the varied needs of an ageing population by extending choice through the provision of appropriately designed housing.
 - Provision could also be made for a percentage of affordable housing in a number of settlements, thus enabling those households who cannot afford housing on the open market to make their first step onto the housing ladder through shared ownership or shared equity options or where this option is not affordable, renting through a registered housing provider in a range of locations where people want to live.
 - A proportionate amount of housing growth could help sustain a range of local services and facilities. This may be particularly relevant in village locations. (Forecasts suggest that over time, the average size of households will become smaller and without housing growth, local populations may decrease. In such circumstances, some services and facilities may fall into decline or be lost if they are no longer viable to retain at a local level).

Disadvantages

- 1.9 It is considered that a proportionate approach to housing distribution has a number of disadvantages:
- A purely numerical approach to distributing housing growth does not take into account the varying levels of accessibility that each of the towns and excluded villages listed in the Issues and Options Paper has to jobs, public transport and the services and facilities that communities need to be sustainable.
 - The borough's small excluded villages of Digswell, Oaklands and Mardley Heath, and Woolmer Green have small service centres, a limited range of local facilities and very few local job opportunities, and are generally not quite as well served by public transport as the towns and larger villages. These are not the most sustainable locations for housing growth.
 - The "rest of the borough" includes the borough's smallest villages, hamlets, areas of ribbon development and other rural areas. All are washed over by the Green Belt. Communities in these areas look towards the borough's larger villages and towns for jobs, shops, services and other facilities. They are locations where households tend to be largely car dependant. A dispersed pattern of development in unsustainable locations has

the potential to affect many rural parts of the borough, resulting in the encroachment of development into the countryside.

- Whilst distributing growth towards all the borough's towns and excluded villages would spread the demands on infrastructure, there may be a risk that viable local solutions may not be achievable in all instances. For example, proportionate development in the villages will increase the demand for primary school places. Primary schools in the borough are generally at or near capacity with limited opportunities to expand to accommodate additional forms or half forms of entry. In the absence of a local viable solution, young children may need to travel to distant towns or villages for their education. This could create more traffic at peak hours, increasing the potential for congestion on the highway network.
- Due to the limited amount of identified capacity for housing within the borough's defined urban areas, distributing growth on a proportionate basis would result in the need for Green Belt reviews affecting the majority of the settlements listed in the Issues and Options Paper. Development around this number of settlements could have a profound effect on the purposes of including land within the Green Belt and in many locations, allowing urban areas to encroach into the countryside, would have a significant effect on the openness of the Green Belt.

1.10 In addition:

- The council's Strategic Housing Land Availability Assessment (phase 1 - urban areas and phase 2 - sites outside urban areas) indicates that there is not a sufficient spread of suitable and available sites in sustainable locations to deliver proportionate growth in all settlements and parts of the borough. This is, to one degree or another, a particular issue for Welwyn Garden City, for the villages of Cuffley, Digswell, Little Heath, Oaklands and Mardley Heath, and Woolmer Green, and for smaller settlements elsewhere in the borough.
- The options for identifying locations for further housing growth beyond the plan period are limited and would not result in a proportionate distribution of housing growth.

Uncertain effects

1.11 It is considered that an effect that could arise as a result of this option is uncertain.

- Whilst distributing growth on a proportionate basis should help to sustain local services and facilities, it is difficult to predict with certainty how service providers, who are under pressure to reduce spending, will manage their services in the future. An increase in households and population may not always guarantee that services or facilities will be retained or improved, especially if re-organisation plans move towards more centralised service provision in other locations.

Alternative suggestions

1.12 In response to the to the representation received to the Issues and Options Paper suggesting that new small villages should be created around existing clusters of housing as an alternative to a proportionate pattern of distribution; this is not considered to be a reasonable option for the following reasons:

- In order to take forward this alternative suggestion, Green Belt reviews would be required in rural areas which do not adjoin an existing urban boundary. The borough's rural areas

are vital to maintaining the openness of the Green Belt and preventing urban sprawl. Such an approach would not safeguard the countryside from encroachment and would not assist with urban regeneration.

- The creation of new villages would result in development taking place in locations which are not served by rail services and are likely to be poorly served by bus services. Development in such locations is therefore likely to be highly dependent upon the use of the car. This is likely to add to congestion on the highway network and add to greenhouse gas emissions as new communities would need to travel to reach the schools, jobs, shops, services and community facilities they will need.
- As set out in the supporting paper to the “How Many Homes” housing targets consultation in 2010, the provision of at least 1,500 new homes is likely to be required in order to create a sufficient population catchment to support a basic range of services and facilities, such as a two form entry primary school, a day nursery/pre-school nursery and a small range of local shops to support the creation of a new sustainable neighbourhood, (such as a new village). A new village of 1,500 homes would not be small; it would be a similar size to the village of Welwyn, one of the borough’s larger villages.
- No suitable locations have been promoted which would result in the creation of a small sustainable new village.

Conclusion

- 1.13 This option explores whether or not it would be possible to make provision for housing growth across the borough on an equitable basis so that no one town, village or the rural area absorbs a disproportionate amount of housing growth compared to current dwelling stock levels.
- 1.14 It is however a numerical scenario which then needs to be informed by the council’s SHLAA to test the deliverability of the option.
- 1.15 A review of all the potential broad locations set out in the Issues and Options Paper 2009 has been carried out and a summary of our assessment of these locations, together with a summary of the responses received to consultation in connection with these potential broad locations submitted at the Issues and Options stage, can be found at Appendix A to this paper. The SHLAA also identifies other opportunities that have been assessed as being suitable and available for future housing growth.
- 1.16 Table 2, on the following page, sets out the capacity to deliver housing growth for each of the excluded settlements and for the ‘rest of the borough’, compared to the level of growth when applied on a proportionate basis (15.7%).
- 1.17 In practice, as Table 2 demonstrates, it has not been possible to identify sufficient deliverable sites or broad locations for growth that have been assessed in the SHLAA as suitable and deliverable in sustainable locations across the borough on this proportionate basis. Neither could this option deliver the overall housing target between 2011 and 2029.

Table 2: Option 1: Proportionate growth – Opportunities to deliver within the borough by settlement/location (2011 – 2029)

A	B	C	D	E	F	G
Settlement	Existing no of dwellings	Dwelling target on the basis of proportionate (15.7%) growth	Estimated Capacity**	% increase (D as a percentage of B)	Scale of change***	Relationship to proportionate growth (15.7%)
Welwyn Garden City	20,328	3192	2747	13.5%	Moderate	Below
Hatfield	13,105	2058	3226	24.6%	Major	Above
Brookmans Park	1,633	256	260	15.9%	Moderate	Broadly equivalent
Cuffley	2,019	317	212	10.5%	Moderate	Below
Digswell	671	105	50	7.5%	Minor	Below
Little Heath	454	71	13	2.9%	Minor	Below
Oaklands and Mardley Heath	1,319	207	40	3.0%	Minor	Below
Welham Green	1,278	201	215	16.8%	Moderate	Above
Welwyn	1,529	240	306	20.0%	Moderate	Above
Woolmer Green	600	94	9	1.5%	Minor	Below
Rest of the borough	2,913	457	69	2.4%	Minor	Below
Totals	45,850	7,198*	7,147			
Allowance for non- implementations			(- 40)			
Total capacity			7,107	-	-	-

*Note: Total does not sum to the target of 7,200 due to rounding, ** Estimated capacity refers to all suitable opportunities within and outside existing urban areas, ***Minor growth < 10%, Moderate growth 10.1 to 20%, Major growth.>20.1%

- 1.18 Applying a non-implementation rate of 5.2% to planning permissions would reduce the capacity of this option to **7,107**. Even if it were possible to identify a sufficient spread of suitable and deliverable sites/locations across the borough on the basis of proportionate growth, there are a number of advantages and disadvantages associated with this option.
- 1.19 A particular concern is around growth that may be associated with the excluded villages with small service centres and the ‘rest of the borough’ which contains even smaller villages and hamlets. These are not considered to be sustainable locations for growth. They are all predominantly car dependent, with communities having to travel to other locations for the jobs, services and facilities that they need to access on a regular basis. **The option of proportionate growth is not considered to be a reasonable alternative.**

2. **OPTION 2: GROWTH MAINLY FOCUSED TOWARDS WELWYN GARDEN CITY**
- 2.1 Responses to consultation considered that options for growth around Welwyn Garden City (PG32a in the Issues and Options Paper 2009) would be constrained by capacity issues at Rye Mead Sewage Treatment Works. Welwyn Garden City, as the world's second garden city, is built to a low density and is sensitive to change. The A1(M) forms a key boundary to expansion to the west. Expansion to the north is problematic due to the river valley, quality of landscape and potential for coalescence. Locations to the east are poorly related to the urban structure and integration would be difficult.
- 2.2 **Potential of this option to deliver the housing target:** The Issues and Options paper described the sustainability advantages and disadvantages of focussing growth towards the town. The council's Strategic Housing Land Availability Assessment, Phase 1 - urban areas and Phase 2 – outside urban areas, includes our current estimates of dwelling capacity on a range of sites, some of which fall within the broad locations described in the Issues and Options Paper. The SHLAA considers whether sites are suitable and available for housing.
- 2.3 Table 2, set out in the proportionate growth option above, indicates the maximum capacity identified for all settlements including land currently within the Green Belt. (A review of all broad locations is set out in Appendix A together with a summary of responses received to consultation on the potential broad locations at the Issues and Options stage).
- 2.4 Under this option, growth would mainly directed towards Welwyn Garden City, the best use would be made of urban capacity in all settlements (3297²), together with sites with planning permission in our rural areas (25) and the redevelopment of a Major Developed Site in the Green Belt (180). A Green Belt boundary review within the borough would be limited to an urban extension and a broad location for growth assessed as suitable and deliverable around Welwyn Garden City only (900).
- 2.5 This option would be capable of delivering a total of 4,402 new dwellings. Applying a non-implementation rate of 5.2% on planning permission adjusts the total capacity of this option to **4,362**.
- 2.6 Clearly, this option would not be capable of delivering the housing target of 7,200 over 18 years from 2011 to 2029. The shortfall in this option means that insufficient housing would be delivered to meet the likely housing requirement arising from natural change within the population (as described in background paper 1). This levels of growth would limit opportunities to secure affordable housing and could constrain opportunities for economic growth, which if realised could then result in a significant increase in in-commuting adding congestion to the transport network.
- 2.7 **Option 2 (PG32a) is not considered to be reasonable alternative.**

² 3,297 comprises all completions (294), 2011/12 plus capacity of 3003.

3. OPTION 3: GROWTH MAINLY FOCUSSED TOWARDS HATFIELD

- 3.1 Responses to consultation considered that urban extensions would be suitable around Hatfield (PG32b in the Issues and Options Paper 2009). The town has a train station, good cycle links, community/support services such as schools and leisure facilities. Large scale development would lead to investment in the town and regeneration of the town centre. Hatfield has significant sources of employment. Growth to the west of Hatfield can complement recent development at Hatfield Aerodrome. Development to the north or south does not impact on the Country Park and would not result in coalescence with St Albans or Welwyn Garden City. Expansion west of A1(M) provides an opportunity to invest in the public transport network connecting with employment sites. Hatfield doesn't have much character to preserve.
- 3.2 **Potential of this option to deliver the housing target:** Under this option, growth would mainly be directed towards Hatfield, the best use would be made of urban capacity in all settlements (3,297), together with sites with planning permission in our rural areas (25) and the redevelopment of a Major Developed Site in the Green Belt (180). A Green Belt boundary review within the borough would be limited to an urban extension and a broad location for growth assessed as suitable and deliverable around Hatfield only (2115).
- 3.3 This option would be capable of delivering a total of 5,617 new dwellings. Applying a non-implementation rate of 5.2% on planning permission adjusts the total capacity of this option to **5,577**.
- 3.4 Clearly, this option would not be capable of delivering the housing target of 7,200 over 18 years from 2011 to 2029. The shortfall in this option means that insufficient housing would be delivered to meet the likely housing requirement arising from natural change within the population (as described in background paper 1). This levels of growth would limit opportunities to secure affordable housing and could constrain opportunities for economic growth, which if realised could then result in a significant increase in in-commuting adding congestion to the transport network.
- 3.5 **Option 3 (PG32b) is not considered to be reasonable alternative.**

4. **OPTION 4: GROWTH FOCUSED MAINLY TOWARDS WELWYN GARDEN CITY AND HATFIELD**

- 4.1 The option of directing growth mainly towards the borough's two towns was included in the Issues and Options Paper 2009 as option PG32c. This was put forward as an alternative to the option of proportionate growth (PG31), alongside options for growth around either Welwyn Garden City, PG32a, or, growth around Hatfield, PG32b (all described above). The Issues and Options Paper described the sustainability advantages and disadvantages of directing growth towards the two towns.
- 4.2 Consultation responses the option of distributing growth mainly towards Welwyn Garden City and Hatfield (PG32c) raised the following issues:
- This approach would be consistent with their status as a Key Centre for Development and Change and in general conformity with the Regional Spatial Strategy (policies SS3 and LA3), which is a requirement of PPS12. Growth here would provide an opportunity to create sustainable communities. Agree that concentrating growth creates economies of scale to deliver sustainable communities but this could be through a combination of one or more strategic extensions coupled with smaller urban extensions, strategically located on communication routes where economic growth is favourable. Both towns have a successful track record as New Towns.
- 4.3 Other Comments received raised the following issues:
- In the absence of a full evidence base it is not possible to select an option.
 - Selection should be based on a criteria based approach and whether options are deliverable in accordance with PPS1.
 - Needs to be based on an assessment of urban capacity and deliverability followed by the selection of urban extension opportunities based on performance against sustainability, and other, criteria such as the strategic function of the Green Belt rather than a theoretical model of distribution. The results of the SHLAA and the SHMA were not available.
 - The Green Belt should not be turned into a new Greater London area. It would make more sense to build around the outside of the green belt or within the existing London area.
 - Options do not take account of local objections to the East of England Plan.
- 4.4 The County Council indicated that from a schools planning standpoint, it would prefer fewer larger developments to validate the construction of new schools. There is limited potential to expand schools in urban areas. Significant growth would lead to the need for additional primary school sites either within or on edge of settlements.
- 4.5 **Potential of this option to deliver the housing target:** Directing growth mainly towards Welwyn Garden City and Hatfield is considered to have the potential to deliver the housing target of 7,200 between 2011 and 2029 as set out below.

Table 3: Option 4 - Distribution by settlement and type of capacity 2011 - 2029 (excluding windfall allowance)

Settlement/Location	Urban Capacity*	Release of Green Belt in Welwyn Hatfield	Release of Safeguarded Land	Major Developed Site in the Green Belt	Release of Green Belt in East Herts/St Albans	Total	% by settlement /location
Welwyn Garden City	1847	200	700	0	400	3147	45.1%
Hatfield	1111	2115	0	0	60	3286	47.1%
Welwyn	96	0	0	180	0	276	4.0%
Brookmans Park	30	0	0	0	0	30	0.4%
Welham Green	5	0	0	0	0	5	0.1%
Cuffley	62	0	0	0	0	62	0.9%
Oaklands & Mardley Heath	30	0	0	0	0	30	0.4%
Digswell	50	0	0	0	0	50	0.7%
Little Heath	13	0	0	0	0	13	0.2%
Woolmer Green	9	0	0	0	0	9	0.1%
Rest of borough	69	0	0	0	0	69	1.0%
Totals	3322	2315	700	180	460	6977	100.0%
Percentages	47.6%	33.2%	10.0%	2.6%	6.6%	100.0%	-

* Urban capacity includes all completions (294) 2011/12 and capacity on urban and sites in the Green Belt with planning permission

- 4.6 The components of this option include the completions achieved in 2011/12, the council's estimates of urban capacity in the towns and excluded villages, known capacity on small sites in the Green Belt with planning permission and the redevelopment of a previously developed site in the Green Belt which lies in close proximity to an excluded village with a large service centre where development would not require a review of Green Belt boundaries. This option would also include two Broad Locations for Growth within the borough; one to the north east of Welwyn Garden City through the use of Safeguarded Land and one to the north west of Hatfield which would require a review of Green Belt boundaries. It also includes an allowance for two smaller urban extensions; one each around Welwyn Garden City and Hatfield (one of which would involve some land within the adjoining district of St Albans); both of which would require a review of Green Belt boundaries. Finally, it includes an allowance for housing to be delivered at a broad location on land within East Herts as an extension to Welwyn Garden City. These components combined result in a housing supply figure of 6,977.
- 4.7 The capacity shown in table 3 is supplemented by an allowance for windfall development (of 290 dwellings). A deduction (of 40 dwellings) has been applied to reflect the non-implementation of planning permissions (at a monitored rate of 5.2%). This increases the overall capacity of this option to **7,227**.

Table 3a: Option 4 -Total housing supply

Capacity from table 3	6977
Windfall allowance	290
Allowance for non-implementations	(- 40)
Total capacity	7,227

4.9 Table 4 below compares the distribution pattern by type of settlement or location between this option and what would be theoretically required under a proportionate growth approach. (This is theoretical because as Option 1 above explains, it has not been possible to identify a spread of suitable and deliverable sites on the basis of proportionate growth for each of the settlements listed).

Table 4: Option 4 - Distribution by type of settlement or location 2011 – 2029 compared to proportionate growth (option 1) – excluding windfall allowance

Location	Option 4 - % of overall growth	Comparison to Option 1 - proportionate growth
Growth directed towards Welwyn Garden City	45.1%	44.3%
Growth directed towards Hatfield	47.1%	28.6%
Growth directed towards the four large excluded villages	5.3%	14.1%
Growth directed towards the four small excluded villages/settlement	1.5%	6.7%
Growth in the 'rest of the borough'	1.0%	6.3%
(May not sum to 100% due to rounding)	100%	100%

Beyond the plan period

- 4.10 In order to ensure that Green Belt boundaries can endure beyond the plan period, at 2029, land within the borough, to the west of Hatfield (PG36), could be safeguarded for future housing provision, subject to certain caveats around the extraction of strategic mineral reserves and the re-provision of strategic green infrastructure. This means that land here is unlikely to be available before the end of the plan period. The land could only be released for development following a review of the Green Belt. Estimated capacity here is currently for 1,400 dwellings, around 280 dwellings per annum over a five year period.
- 4.11 This would be 120 p.a. below the 400 p.a. that would be required to maintain housing land supply at plan period levels. This underscores the need to explore the option to deliver housing growth on land in East Herts which would represent an extension to Welwyn Garden City (both within and beyond the plan period). An allowance has already been made for 400 additional dwellings to the east of Welwyn Garden City within the plan period but this could only proceed on the basis that this was part of a much larger development at a broad location which would be of a sufficient scale to deliver a sustainable new neighbourhood including primary and secondary schools provision, and would connect well to the existing urban area.

Advantages

- 4.12 It is considered that this option, which would direct most development towards the borough's two towns of Welwyn Garden City and Hatfield and limit development elsewhere to that which is compatible with a continuation of Green Belt restraint, has a number of advantages.
- It would make best use of existing estimates of urban capacity in the two towns and all excluded villages, thereby minimising the amount of land that will need to be released from the Green Belt to meet long term housing requirements.
 - It takes into account the opportunity to secure the delivery of housing through the redevelopment of a Major Developed Site in the Green Belt which lies in close proximity to a large village and would not require a review of Green Belt boundaries in order to come forward.
 - It would direct further growth that cannot be accommodated within existing defined urban areas, towards two key broad locations; one around Welwyn Garden City and one around Hatfield, where development would best support economic growth, minimise the need to travel and provide access to jobs, services and facilities.
 - It would make use of a large area of Safeguarded Land to the north-east of Welwyn Garden City.
 - The opportunity exists with this option to create a sustainable new neighbourhood to the north west of Hatfield as the land available in this location is of sufficient size to generate the population necessary to support the delivery of new facilities and services.
 - Green Belt reviews would be restricted to the two main towns, thereby minimising the impact of development on the landscape and the purposes of including land in the Green Belt to a few locations.
 - It would leave the Green Belt boundaries around all the borough's villages intact.
 - The large amount of development to be directed towards Hatfield will help increase the population catchment for Hatfield Town Centre which is in need of regeneration.
 - It would make an allowance for land to be safeguarded for future development beyond the plan period to ensure that Green Belt boundaries would not need to be altered at the end of the plan period in accordance with national planning policy.

Disadvantages

- 4.13 It is considered that a number of disadvantages could arise as a result of this option.
- This option demonstrates that there are limited suitable opportunities for housing growth within the borough that would deliver the housing target and be consistent with the borough's vision and objectives. It will be necessary to work with other local authorities and key stakeholders to deliver some growth outside borough boundaries where this would result in growth at broad locations or at an urban extension to the borough's towns. This approach may mean that it could be challenging to maintain a flexible supply of housing land throughout the plan period.
 - With growth directed mainly towards Welwyn Garden City and Hatfield, with no planned growth directed towards the borough's villages, then residents of villages and other rural

areas may have to look towards these two towns, or towards other locations outside the borough, if the existing housing stock in villages and rural areas fails to meet their future housing requirements, e.g. smaller homes to meet demand arising from newly forming single person and other small households, affordable homes to meet the needs of those who cannot afford to rent or buy on the open market, adaptable or specialist housing to meet the needs of an ageing or disabled population.

- Population and household forecasts point to decreasing household sizes in the future. As a result, without housing growth, village populations may decline and villages may become more vulnerable to the loss of facilities such as post offices, shops, pubs and bus services as they became unviable to retain (representations from a local parish council to the “How Many Homes” consultation in 2010 highlighted the collapse in village infrastructure - shops, post offices and public transport networks – over the last 20 years).
- Hatfield would absorb a disproportionate amount of growth within the plan period. Excluding the allowance for windfalls (because by their very nature, their precise location is currently unknown), over 47% of all future housing growth in the borough would be directed towards Hatfield (compared to a current dwelling stock of just under 29%) and just under 93% of all housing growth would be directed towards the two towns.
- Taking into account the use of safeguarded land to the west of Hatfield and land to the east of Welwyn Garden City within East Herts for the five years beyond the plan period, the amount of housing growth in and around Hatfield increases to 49.6% of all growth, with 45% in and around Welwyn Garden City and 5.4% in the rest of the borough (including villages).
- The A1(M) and the junctions serving the A1(M) will come under significant pressure to accommodate increased amounts of traffic as a result of such high levels of development in its vicinity.
- The opportunity to create a sustainable new neighbourhood on land in East Herts, as an extension to Welwyn Garden City, will be dependent upon successful joint working arrangements being established and maintained between local authorities, landowners, developers, and infrastructure and service providers. If this could not be achieved, then the council’s ability to meet the overall housing target may be compromised.
- An urban extension around Hatfield may require joint working with St Albans City and District Council. If this could not be achieved, then capacity may be reduced.
- The strategy provides little room for flexibility. (An allowance for windfall development is included in this option). Whilst more windfall sites may come forward than allowed for in this option, this has to be balanced against the possibility that some known sites may not come forward as anticipated.

Uncertain effects of this option

4.14 It is considered that a number of effects that could arise as a result of this option are uncertain.

- It is difficult to say precisely to what extent the possible loss of services and facilities in villages would be attributable to decreasing household sizes and how much will be down to personal choice. The borough’s households are characterised by high rates of car ownership, providing access to large supermarkets and shopping centres elsewhere. The use of the internet for communication, purchasing goods and accessing services may also

have a future impact on the provision of local services and facilities. However, for those without a car, accessibility to some services and facilities could be affected if populations remain static or fall.

- The regeneration plans for Hatfield Town Centre have been affected by poor market conditions and are unlikely to be carried forward in full until the economy shows signs of improvement. Whilst the large amount of development directed towards Hatfield will help increase the population catchment for Hatfield Town Centre, investment is likely to be required in transport, walking and cycling links to minimise car based journeys to encourage visitors to the town centre, as there is no guarantee that shoppers will not favour other nearby town centres such as St Albans or Welwyn Garden City or out of centre locations.

Conclusion

- 4.15 Distribution option 4 would involve making the best use of urban capacity in the towns and excluded villages, known capacity on small sites in the Green Belt with planning permission, the redevelopment of a previously developed site in the Green Belt which lies in close proximity to Welwyn village where development would not require a review of Green belt boundaries, and an allowance for windfall development.
- 4.16 In addition broad locations and urban extensions would need to be brought forward for development within the borough. The SHLAA has identified suitable opportunities within the following broad locations identified at Issues and Options as follows:
- North East of WGC (PG33) as a broad location for growth for around 700 new dwellings.
 - North of Hatfield (PG35) as a broad location for growth for around 2000 new dwellings.
 - Whilst insufficient land was considered suitable to be identified as a strategic broad location for growth within (PG37) sufficient opportunities within the plan period are identified for an urban extension to Hatfield (PG37) for around 175 dwellings (60 of which would be within St Albans).
- 4.17 Additional land has been promoted for development, which did not form part of the broad locations set out in the issues and Options Paper. All locations have been assessed through the council's Strategic Housing Land Availability Assessment. One location around Welwyn Garden City has been assessed as being suitable and available for housing within the plan period. This comprises one of the components of this distribution option:
- An urban extension to Welwyn Garden City for around 200 dwellings.
- 4.18 No more suitable opportunities for development outside the borough's existing defined urban areas have been identified to ensure that there would be a continuing delivery of housing towards the end of the plan period to meet the objectively assessed housing requirement within the borough. As a consequence, it will be important to explore the opportunity for development to the east of Welwyn Garden City on land within East Herts. An allowance has been made for development coming forward in this location within the plan period which would help meet the housing requirements of Welwyn Garden City:
- Land to the east of Welwyn Garden City within East Herts for around 400 dwellings.
- 4.19 The opportunity to bring forward land for housing in this location will also be important beyond the plan period. However, as land in this location lies outside the borough, it is not land that can be allocated in the Welwyn Hatfield Local Plan and it is not yet clear if East Herts is minded to take this location forward.

4.20 This distribution option therefore includes a further location within the borough. It is not considered that land at this location would be available for housing within the plan period (hence the importance of exploring opportunities in adjoining areas). It has been identified as suitable to be safeguarded for development beyond the plan period but this will be subject to a number of significant concerns and constraints being addressed:

- Safeguarded Land - West of Hatfield (PG36) for around 1,400 dwellings

4.21 The approach responds to views submitted in response to consultation. This distribution of development 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;
- 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;
- 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.

4.22 Overall, and taking into account the responses to consultation, our review of the potential broad locations, the advantages, disadvantages and uncertain impacts set out above, **this is considered to be a reasonable option.**

- 5. OPTION 5: Growth focussed on the two towns and the large-scale expansion of one or more of the large Excluded villages.**
- 5.1 This draws upon options explored in the Issues and Options Paper 2009. It considers any potential options for the large scale expansion of the boroughs excluded villages.
- 5.2 The Issues and Options Paper in 2009 made it clear (paragraph 6.244) that the council considers the major expansion of the borough's villages would be contrary to the regional spatial strategy and the vision for the borough. However, the Issues and Options Paper explored (paragraph 6.245) the issue of village growth, which could arise if the options for either proportionate growth across all the borough's urban areas or concentrated growth around Hatfield and/or Welwyn Garden City proved to be undeliverable or cumulatively failed to meet the minimum housing requirement.
- 5.3 At the time of the Issues and Options Paper in 2009, indications were that opportunities for large scale village expansions may exist around all the borough's excluded villages and settlements. However, only potential broad locations around Brookmans Park and Cuffley were estimated to have sufficient capacity to create a sustainable new neighbourhood with at least 1,500 new homes, creating a sufficient catchment population to sustain a range of new services and facilities. Other opportunities around other villages at that time still suggested a potential for major village expansion but none would be of sufficient size to create a sustainable new neighbourhood.
- 5.4 Views were sought on a number of potential broad locations (i.e. PG39 – 46). The responses received to consultation are set out in Appendix A to this paper.
- 5.5 A new neighbourhood of around 1,500 new dwellings would increase the number of dwellings in Brookmans Park by around 92% and Cuffley by around 74%. Growth at this scale would have a disproportionate impact on the scale and character of these villages. Such large scale development would have a significant impact on the setting of the villages within the wider rural landscape and on the openness of the Green Belt. This level of growth around these villages would run contrary to the settlement hierarchy which identifies Welwyn Garden City and Hatfield as the principal focus for development. It would place a significant amount of development in locations that are remote from major areas of employment. Cuffley does not have its own secondary school and whilst Brookmans Park does have a secondary school, there would be concerns around its capacity to accommodate large scale growth. There are also concerns that primary schools will not have the capacity to expand to accommodate a significant increase in child population. Development on this scale in these locations would inevitably increase the level of car based journeys on the road network so that communities can access the range of jobs, services and facilities they need.
- 5.6 **Potential of this option to deliver the housing target:** A subsequent review has been carried out of all the broad locations around the villages set out in the Issues and Options paper. The results of this review are set out in Appendix A to this paper. For Brookmans Park and Cuffley, the review indicates that only smaller areas of land would be considered suitable for future development, with a revised capacity of 230 around Brookmans Park and 130 around Cuffley. Clearly, opportunities are no longer considered to exist to create large scale sustainable new neighbourhoods around either village.
- 5.7 **The large scale growth of one of the borough's villages is not considered to be a reasonable alternative.**

6. **OPTION 6: GROWTH MAINLY DIRECTED TOWARDS WELWYN GARDEN CITY AND HATFIELD WITH LIMITED GROWTH AROUND LARGE EXCLUDED VILLAGES**

- 6.1 This distribution option is a variant of (and a combination of) the Proportionate Distribution option (PG31 in the Issues and Options Paper and option 1 in this paper) and Growth directed mainly towards Welwyn Garden City and Hatfield (PG32c in the Issues and Options Paper and option 4 in this paper).
- 6.2 Option 6 varies from distribution Option 1 (Proportionate distribution) because:
- It does not seek to distribute any housing growth around any of the borough's excluded villages with small service centres (i.e. Digswell, Oaklands and Mardley Heath, and Woolmer Green) or the "rest of the borough" as these locations are not considered to represent sustainable locations for housing growth. In addition, no growth is directed towards Little Heath, as no suitable or available sites have been identified.
- 6.3 Option 6 varies from distribution Option 4 (growth mainly directed towards Welwyn Garden City and Hatfield) because:
- It makes an allowance for limited growth around large excluded villages (option 4 does not), where growth is limited to suitable and deliverable sites in sustainable locations which would either not require a review of Green Belt boundaries or, where a Green Belt review would be required, would restrain growth to a level that would be broadly equivalent to or below levels for proportionate growth;
 - It does not include an allowance for windfall development (option 4 does); and
 - It does not include an urban extension around Hatfield (option 4 does).
- 6.4 Since the publication of the Issues and Options Paper 2009, the potential Broad Locations for growth have been reviewed. Appendix A contains a summary of the council's current assessment of their suitability for housing.
- 6.5 This review concludes that suitable opportunities around the villages are limited. In total, it is estimated that provision could be made for 770 additional dwellings around the four excluded villages with large service centres. A Green Belt review would be required to deliver 590 of these dwellings around (and distributed between) Brookmans Park, Cuffley and Welham Green.
- 6.6 **Potential of this option to deliver the housing target:** Directing growth mainly towards Welwyn Garden City and Hatfield together with limited growth around the excluded villages with large service centres is considered to have the potential to deliver a housing target of 7,200 between 2011 and 2029.
- 6.7 The components of this option would include the completions achieved in 2011/12, the council's estimates of urban capacity in the towns and excluded villages and known capacity on small sites in the Green Belt with planning permission (with a deduction made for a non-implementation rate of planning permissions at 5.2%) and the redevelopment of a previously developed site in the Green Belt which lies in close proximity to an excluded village with a large service centre where development would not require a review of Green Belt boundaries.
- 6.8 This option would also include two Broad Locations for Growth within the borough; one to the north east of Welwyn Garden City through the use of Safeguarded Land and one to the north

of Hatfield which would require a review of Green Belt boundaries. It includes an allowance for one urban extension around Welwyn Garden City which would require a review of the Green Belt boundary. It also includes an allowance within (and beyond) the plan period for housing to be delivered at a broad location on land within East Herts as an extension to Welwyn Garden City.

- 6.9 In this option, limited growth would also be directed towards the excluded villages with large service centres on a broadly proportionate basis to the number of dwellings in those villages, where suitable and available opportunities exist. In the case of Brookmans Park, Cuffley and Welham Green, due to the limited opportunities for housing within existing defined urban areas, land would need to be released from the Green Belt where suitable and available sites can be identified in sustainable locations from within the broad locations set out in the Issues and Options Paper or, as otherwise identified in the council's SHLAA as being suitable and available for housing. In the case of Welwyn village, an opportunity has arisen to deliver housing through the redevelopment of a Major Developed Site in the Green Belt in close proximity to the village. Land would not need to be released from the Green Belt to bring this site forward. Together with known urban capacity, sufficient opportunities would exist in and around Welwyn village to accommodate development on a proportionate basis. No changes to Green Belt boundaries would be required around Welwyn village.
- 6.10 Unlike option PG31, no growth is directed towards excluded villages with small service centres (Digswell, Oaklands & Mardley Heath, Woolmer Green), which are considered to be less sustainable locations, or to Little Heath (where no suitable and available sites have been identified in the council's SHLAA).
- 6.11 This option has the potential to deliver 7392 new dwellings as shown in Table 5 below.

Table 5: Option 6 - Distribution by settlement and type of capacity 2011 – 2029

Settlement Focus	Urban Capacity	Release of Green Belt in Welwyn Hatfield	Release of Safeguarded Land	Major Developed Site in the Green Belt	Release of Green Belt in East Herts	Total	%
Welwyn Garden City	1847	200	700	0	400	3147	42.57%
Hatfield	1111	2000	0	0	0	3111	42.09%
Welwyn	96	0	0	180	0	276	3.73%
Brookmans Park	30	230	0	0	0	260	3.52%
Welham Green	5	210	0	0	0	215	2.91%
Cuffley	62	150	0	0	0	212	2.87%
Oaklands & Mardley Heath	30	0	0	0	0	30	0.41%
Digswell	50	0	0	0	0	50	0.68%
Little Heath	13	0	0	0	0	13	0.18%
Woolmer Green	9	0	0	0	0	9	0.12%
Rest of borough	69	0	0	0	0	69	0.93%
Sub-totals	3322*	2790	700	180	400	7392	100.00%
Percentage	44.94%	37.74%	9.47%	2.44%	5.41%	100.00%	-
Allowance for non-implementations						(-40)	
Total capacity						7,352	-

* Urban capacity includes all completions (294) 2011/12 and capacity on urban and sites in the Green Belt with planning permission

- 6.12 Table 6 below compares the distribution pattern by type of settlement or location between this option and what would be theoretically required under a proportionate growth approach. (This is theoretical because as Option 1 above explains, it has not been possible to identify a spread of suitable and deliverable sites on the basis of proportionate growth for each of the settlements listed). It also compares the distribution pattern for option 4.

Table 6: Distribution by type of settlement or location, 2011 – 2029 comparison between options 1 (proportionate distribution), 4 (growth directed towards Welwyn Garden City and Hatfield) and 6 (growth mainly directed towards Welwyn Garden City and Hatfield with limited growth towards villages) – excluding windfall allowance

Location	Option 6 - % of overall growth	Option 4 - % of overall growth	Option 1 - proportionate growth
Growth directed towards Welwyn Garden City	42.6%	45.1%	44.3%
Growth directed towards Hatfield	42.1%	47.1%	28.6%
Growth directed towards the four large excluded villages	13.0%	5.3%	14.1%
Growth directed towards the four small excluded villages/settlement	1.4%	1.5%	6.7%
Growth in the 'rest of the borough'	0.9%	1.0%	6.3%
(Note: May not sum to 100% due to rounding)	100%	100%	100%

- 6.13 Taking into account a non-implementation rate on planning permissions of 5.2%, this option has the potential to deliver around **7,352** new dwellings. This is slightly above the housing target of 7,200. An additional allowance for windfall developments of 290 dwellings would take this capacity to **7,642** and would allow for flexibility in housing supply to allow the market to respond to changing circumstances over the plan period. This would represent a 6.1% allowance over and above the housing target.

Beyond the plan period

- 6.14 In order to ensure that Green Belt boundaries can endure beyond the plan period, at 2029, land within the borough, to the west of Hatfield (PG36), could be safeguarded for future housing provision, subject to certain caveats around the extraction of strategic mineral reserves and the re-provision of strategic green infrastructure. This means that land here is unlikely to be available before the end of the plan period. The land could only be released for development following a review of the Green Belt. Estimated capacity here is currently for 1,400 dwellings, around 280 dwellings per annum over a five year period.
- 6.15 This would be 120 p.a. below the 400 p.a. that would be required to maintain housing land supply at plan period levels. This underscores the need to explore the option to deliver housing growth on land in East Herts which would represent an extension to Welwyn Garden City (both within and beyond the plan period). An allowance has already been made for 400

additional dwellings to the east of Welwyn Garden City within the plan period but this could only proceed on the basis that this was part of a much larger development at a broad location which would be of a sufficient scale to deliver a sustainable new neighbourhood including primary and secondary schools provision, and would connect well to the existing urban area.

Advantages

6.16 It is considered that this option, which directs most development towards Welwyn Garden City and Hatfield, with limited growth directed towards the large excluded villages, making use of urban capacity within small excluded villages and limiting development elsewhere to that which is compatible with Green Belt restraint so that development is located in the most sustainable locations has a number of advantages.

- It would facilitate and promote sustainable and inclusive patterns of urban and rural development, bringing forward sufficient land for housing in appropriate locations in balance with economic, social and environmental objectives;
- It would direct development towards existing centres and near to public transport interchanges with good access to jobs and key services;
- New development would support existing communities; each of the towns and villages with large service centres would help to meet future demand for housing from newly forming households within the settlement itself, from elsewhere within the borough as well as from those wishing to move into the area.
- New housing could help address the varied needs of an ageing population by extending choice in a number of settlements through the provision of appropriately designed housing.
- Provision could also be made for a proportion of affordable housing to be delivered in both towns and villages through shared ownership or shared equity options or where this option is not affordable, renting through a registered housing provider in a range of locations. This would introduce a mix of tenure options and extend housing choice in many of the borough's villages where there are usually few opportunities to secure affordable housing options.
- Most development would be directed towards the two towns where it can best support opportunities for economic growth in those locations.
- It would make use of a large area of Safeguarded Land to the north-east of Welwyn Garden City.
- New development would be guided to locations where services and facilities can be accessed on foot, bicycle or public transport rather than having to rely on access by car; encouraging accessible public transport provision to secure sustainable patterns of transport development; and
- A broadly proportionate amount of housing growth (where suitable and available sites can be identified) could help sustain local services and facilities in village locations.

6.17 No allowance has been made for windfall development in this option. There is compelling evidence of a trend in the borough for windfall sites to come forward over time for development. A reasonable assumption can be made that over the plan period, a further 290 dwellings will come forward on such sites, 17 p.a. This will allow for additional flexibility in housing delivery, allowing for choice and competition in the market.

Disadvantages

6.18 The main disadvantages associated with this option are:

- Green Belt boundary reviews would need to take place around Welwyn Garden City, Hatfield, Brookmans Park, Cuffley and Welham Green therefore spreading the impact of development in hitherto Green Belt locations, across the borough, rather than a more concentrated approach, such as option 4, where growth would be directed mainly towards the two towns.
- With one or two exceptions, existing village schools are on tightly constrained sites. These either have no potential to expand further or there are significant feasibility and viability issues associated with their expansion. Additional housing development around the villages may lead to primary school age children needing to travel to other towns or villages for their education. This could lead to more traffic on the highway network, increasing congestion and emissions.

Conclusion

6.19 The option responds to views submitted in response to consultation. The distribution of development would:

- Plan for growth at the most sustainable locations;
- Focus most growth towards Welwyn Garden City and Hatfield;
- Improve housing supply in places where people want to live, providing new opportunities for existing communities;
- Bring potential benefits to larger villages, providing opportunities for wider housing choice such as starter homes, homes designed for older people, affordable/low cost homes, ideally on previously developed land but where this cannot take place, on land adjacent to villages;
- Widen the mix of housing and provide the opportunity to deliver affordable housing in areas that currently have limited or no such provision;
- Support existing facilities in smaller settlements;
- Spread infrastructure requirements;
- Direct most growth away from the smaller settlements which lack employment opportunities and a good range of local services which makes them unsuitable for accommodating significant levels of housing;
- 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;
- 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;
- Take into account the strategic function of the Green Belt.
- Avoid coalescence between settlements and maintain the separate identities of settlements.

6.20 Taking into account the responses to consultation, our review of the potential broad locations, the advantages, disadvantages and uncertain impacts set out above, **this is considered to be a reasonable option.**

7. URBAN CAPACITY

- 7.1 **Urban capacity:** Estimates of urban capacity are subject to regular review and updating. Our current estimates for the towns and excluded villages indicates that there is the capacity for around 3000 dwellings to be delivered in the plan period, most of which would be available in the early to mid part of the plan period. (This estimate excludes completions in 2011/12 and would reduce slightly once a non-implementation rate of planning permissions, at 5.2%, has been applied).
- 7.2 **Potential to deliver the housing target:** Restraining development to urban capacity only would mean that the borough would be planning for new housing at a level that would be significantly below projections for household growth likely to arise as a result of natural growth in the borough's population. Migration into the area will add further pressure on the demand for housing. With demands on the housing stock exceeding supply, households would then need to consider moving to other areas to seek alternative housing options, assuming that a suitable supply exists elsewhere, potentially increasing commuting distances and costs and congestion.
- 7.3 An average annual delivery rate of around 167 per annum (2011/12 – 2028/29), would be significantly lower than long term past delivery rates in the borough. At this level, there would be extremely limited opportunities to deliver affordable housing as a proportion of overall supply. The local economy could be constrained if it does not have a sufficient workforce to retain and attract investment from existing businesses and companies new to the area.
- 7.4 Whilst responses to the "How Many Homes" consultation in 2011 indicate that local residents favour restraining future housing targets to urban capacity opportunities; mainly because this would obviate the need for any Green Belt boundary reviews, this option would clearly result in an insufficient supply of new housing which would have social and economic consequences for local communities.
- 7.5 Increasing capacity further within urban areas might be possible if higher densities could be achieved but the difference between existing estimates of total urban capacity and the housing target is significant (around 4,000) and it is difficult to see how this gap could be bridged given that reasonable capacity estimates have already been made. Increasing densities would imply a high proportion of flats in new development. Not only would this have a significant impact on the character of existing urban areas, it would also not deliver a range of housing types and sizes to meet the housing requirements of different households.
- 7.6 This option would maintain the borough's existing Green Belt boundaries. The role of the Green Belt is highly valued by local residents and for many years, it has played a significant role in maintaining the character and setting of the borough's settlements and rural areas. However, this option does not positively plan for housing and economic growth.
- 7.7 **Urban capacity is not considered to be a reasonable distribution option but it is an important component of all other options considered.** It seeks to make best use of previously developed sites in sustainable urban locations and helps to minimise the loss of land from the Green Belt, which would otherwise need to be allocated for housing growth in order to meet the target.

REVIEW OF BROAD LOCATIONS SET OUT IN THE ISSUES AND OPTIONS PAPER (2009)

i. BROAD LOCATIONS FOR GROWTH AROUND WELWYN GARDEN CITY

Consultation responses

Representations made in response to the Issues and Options consultation raised the following issues in relation to the potential broad locations for growth around Welwyn Garden City.

A: North East of WGC (PG33): A petition was submitted objecting to this broad location on the grounds that there would be insufficient infrastructure (such as schools, hospitals, GP surgeries, dentists and community facilities) to support new residents, traffic generation, reduced quality of life for new and existing residents, insufficient water supply and sewerage, increased run-off and the current lack of facilities and amenities particularly for young people. Other responses received also raised concerns around the insufficient scale of development to support new services, the remoteness of the location to local facilities, the prominence of the area in the wider landscape in relation to the Mimram valley and associated SSSIs and wildlife sites, potential contamination of the SSSI by run-off from the new development and poor access to public transport walking and cycling networks. The education provider considered that there was insufficient capacity at the existing primary school and the scale of development would be insufficient to support the provision of an additional primary school. Objections were also submitted to the loss of an active pilot training school. Alternative locations would be too far away and have limited capacity to house displaced aircraft.

In support of this location, the following matters were raised: Most of the area is not designated as Green Belt and is previously-developed land. Development would result in a reduction in aircraft noise and would offer scope to increase services in Panshanger. It would be relatively easy to link development here into the highway network.

B: South-east of Welwyn Garden City (PG34): The main concerns about this broad location were: The potential adverse impact on the Commonswood Local Nature Reserve through increased use and the impact on wildlife sites (including those at Commonswood and Holwell Park including vulnerable species and habitats; the location's prominence in the Lea Valley, the impact on the openness of the Green Belt; the presence of an important area of archaeological significance; the lack of links to the rest of Welwyn Garden City and its distance from the town centre exacerbating the town's "lopsidedness" and making it difficult to incorporate into existing public transport networks; the impact of development on local hydrology and limited sewerage capacity.

In support of this location, the following matters were raised: It would be a logical extension of Welwyn Garden City being well-located in relation to the road, walking and cycling networks with opportunities to improve public transport access as well as being of a size that could create a viable new neighbourhood or a series of new Garden Villages with an opportunity to improve damaged land and the feasibility for providing a district heat and power system. Development here was considered to pose less of a threat of coalescence than other potential locations and the scale of development would be sufficient to create the capacity to support the provision of primary education.

³ Site references from the Strategic Housing Land Availability Assessment (SHLAA) – Phase 2, land outside urban areas, have been included to aid interpretation where relevant to the broad location. The SHLAA forms part of the council's evidence base and can be viewed on the council's website at: <http://www.welhat.gov.uk/index.aspx?articleid=457>

The council's review of the broad locations around Welwyn Garden City

A: North East of WGC (PG33): Originally identified in the Issues and Options Paper as having an estimated capacity for 600 to 1,000 new homes. This location incorporates an airfield and adjoins a residential area. Most of the area promoted for future development is currently designated as an Area of Special Restraint (i.e. it is not in the Green Belt) in the District Plan. The rest of the land promoted is in the Green Belt and designated a Structural Landscaping Area in the adopted District Plan. Land would be available relatively quickly and is currently estimated by the promoter to be capable of accommodating 900 homes alongside a local shop, an on-site decentralised energy centre and possibly workspace, although it is considered that **700** dwellings may be a more realistic figure. This scale of development should support the delivery of a mix of housing types and tenures, including making provision for Gypsy and Traveller pitches. Land owners have indicated a willingness to work together to bring forward development in this location. Local primary schools are at capacity and this matter would have to be addressed as part of any development proposal.

An urban expansion of 700 dwellings would not be sufficient to create a new neighbourhood because it is below the critical mass needed to provide a full range of new facilities including a new neighbourhood centre, schools etc. However, the western end of the site is close to existing shops, a community centre and a surgery at Moors Walk. Proposers are mindful of the need to provide at least a 'corner shop' and some employment opportunities and feel that this could help address some of the accessibility issues of existing development in the eastern part of the Panshanger neighbourhood area.

The Area of Special Restraint has been assessed as having a landscape with medium sensitivity to change and medium capacity to accommodate change. Development could be accommodated provided its impact on the landscape is mitigated. Of critical importance would be the visual impact of any development on the Mimram valley directly to the north east of the site, so structural landscaping on the summit of the valley side would play an important role. The Proposer is suggesting that green infrastructure, such as allotments, could be incorporated into any structural landscaping. The Proposer sees development at this location providing the opportunity to create a long term defensible Green Belt boundary, better than that which currently exists. Landowners have yet to investigate whether or not there might be chalk swallow holes in the area.

This location (SHLAA reference: WGC4) offers some scope for a neighbourhood extension that could be delivered in the early-mid part of the plan period. Most of the area being promoted is not in the Green Belt although it is currently subject to policies of restraint.

Land in this location is considered suitable to take forward as a broad location for housing growth.

B: South-east of Welwyn Garden City (PG34): Originally identified in the Issues and Options Paper as having an estimated capacity for 3,400 to 5,000 new homes. (This location is considered by the proposer to be part of a larger development opportunity encompassing land in East Hertfordshire). Around 30% of the location which falls within Welwyn Hatfield could be developed for housing. All of the land concerned is located in the Green Belt. Around 30% of the location which falls within Welwyn Hatfield is currently considered capable by the landowner of delivering a much lower number of dwellings (about **1,200**) than originally described in the Issues and Options Paper.

Housing in this location could be delivered alongside an extensive area of parkland on land which was previously used for mineral extraction and subsequently land-filled. The proposer considers there is a possibility of a small neighbourhood centre, some employment and a primary school

being provided but this is not certain and no evidence to substantiate this has been provided to suggest this would be deliverable. The promoter considers that development could start within three or four years; with completion within 15 years, in the style of a Garden Suburb to respect the design of Welwyn Garden City.

The area being promoted for housing has been assessed as having a medium capacity to accommodate change within the landscape. Mitigation measures would be required to manage the impact of development on the landscape particularly to the south, which is an area assessed as being highly sensitive to change.

An urban extension on this scale would not be sufficient to create a sustainable new neighbourhood, because it would be below the critical mass needed to provide a range of new facilities. This location has poor connectivity to the existing residential areas on the edge of Welwyn Garden City. The potential for impact on the Commonswood Nature Reserve is a concern and the area of developable land would therefore have to be further reduced resulting in a further reduction to housing numbers. The area available for housing would result in an incoherent Green Belt/settlement boundary beyond the existing urban envelope. There are considerable uncertainties about the extent of previous land uses and mitigation which may or may not be necessary. It is not clear if any of the land in this location is, in reality, developable for housing. (SHLAA reference: WGC5)

Land in this location is not considered suitable to take forward as a broad location for housing growth.

ii. BROAD LOCATIONS FOR GROWTH AROUND HATFIELD

Consultation responses

Representations made in response to the Issues and Options consultation raised the following issues in relation to the potential broad locations for growth around Hatfield.

C: North West of Hatfield (PG35): Concerns about this broad location focussed on the potential impact of development on local infrastructure, particularly roads, and the associated knock-on effects for Wheathampstead and Sandridge.

The education provider owns land [in the Green Belt] which could be a reserve secondary school site serving pupils generated by this option and recapturing pupils from Hatfield, Welwyn Garden City and Wheathampstead who currently travel to schools in St Albans.

D: West of the redeveloped part of Hatfield Aerodrome (PG36): Concerns about this broad location focussed on the loss of Green Belt and the potential for coalescence between settlements. Further concerns were that some of the land is adjacent to old landfill sites, the water table is high with the potential for flooding, housing in this location could be further taken up by student lets, development would be a threat to the habitat of protected species, loss of the village identity of Smallford, the long distance from a railway station, the possible loss of the Ellenbrook Country Park as well as its impact on the Watling Chase Community Forest. Extracting mineral reserves from this location could take ten years and would undermine its allocation for housing until a firm decision about mineral extraction has been made.

In support of this location, the following matters were raised: It is highly deliverable, building on the success of the existing Aerodrome site development. It is of sufficient size to give rise to wider physical and social infrastructure benefits which could include a link road, potential for improvements to more sustainable forms of transport, the potential for improvements to infrastructure capacity including water, sewerage, waste and community infrastructure, as well as

the possibility of achieving a sustainable community. The education provider considered development in this location, if combined with development proposed in option PG35, as supporting the possibility of providing a new secondary school in the locality.

D (variation): West of the redeveloped part of the former Hatfield Aerodrome (PG36a):

Concerns raised about this broad location included the loss of identity for Smallford, which would be “swallowed up” by development, coalescence between Hatfield and St Albans, the impact on the purposes of including land in the Green Belt, the separation by green infrastructure between new housing and Hatfield, the loss of high grade agricultural land and the impact on Junction 3 of the A1(M). St Albans District Council considered that development here would be contrary to the East of England Plan and that any new housing built could not be counted towards Welwyn Hatfield’s housing requirements.

E: West of Ellenbrook and Roehyde (PG37): General concerns about this broad location referred to the loss of green belt land, coalescence between Hatfield, St Albans and Sleapshyde, the loss of the identity of Smallford, existing infrastructure deficits regarding health, education and local retail, loss of habitats, poor public transport, congestion, poor drainage. Other matters raised were non-conformity with the East of England Plan, the severance of Roehyde from Hatfield, existing serious congestion on the A414 and A1057, development being contrary to the objectives of the Watling Chase Community Forest, the location being too far from Hatfield town centre and Hatfield railway station and that the area is a flood zone.

In support of this location, the following matters were raised: Development here could help to achieve the objectives of the Watling Chase Community Forest, it has good highway access, it would lend itself to mixed use development including employment and is of sufficient size to deliver community benefits, affordable housing and infrastructure improvements such as helping to support an east-west public transport system along the A414. The education provider considered that if development was of an appropriate scale, it could generate the requirement for a primary school, which could address the existing deficiency in school provision at Ellenbrook.

F: South of Hatfield (PG38): Concerns about this broad location focussed on the level of development being insufficient to make this a sustainable neighbourhood. Development here would reduce the amount of accessible green space to Hatfield and Welham Green residents and lead to coalescence between Hatfield and Welham Green. Development could exacerbate run-off, causing flooding elsewhere and it is close to busy roads (the A1001 and A1(M)). There were also concerns that there are ponds with associated wildlife habitats that could constrain the amount of developable land. There are very few facilities within walking distance. High grade agricultural land would be lost and nearby schools have insufficient capacity to accommodate growth. Although Welham Green has a railway station, it is only served by slow trains, so commuters could be tempted to drive to stations elsewhere with a faster service.

In support of this location, the following matters were raised: The area has the potential to form an urban extension and the Green Belt boundary should be reviewed. A waste facility in this location could provide the potential opportunity for achieving combined heat and power to enhance the sustainability of neighbouring development. Development on the scale envisaged could create the capacity for an additional form of primary school entry.

The council's review of the broad locations around Hatfield

C: North West of Hatfield (PG35): Originally identified in the Issues and Options Paper as having an estimated capacity for 2,000 to 2,900 new homes. This location is currently considered by the proposers to be capable of accommodating about **2,000** dwellings. More than one landowner is involved and these are willing to work together.

Development at this location (SHLAA reference: Hat1) would have to be planned carefully to avoid coalescence with Stanborough and also to manage intrusion (noise and visual) relating to the A1(M). Sewage and transport capacity, A1(M) junction 4 and local road network will be key considerations for this location. There is a possibility that minerals would be extracted on part of the site before housing could be delivered, which would influence the phasing of housing development. Otherwise, proposers have indicated that phasing could be adjusted to suit the council's housing land supply requirements.

The landscape has been assessed as having medium sensitivity to change and medium capacity for change. Areas of Archaeological Significance are present and some high grade agricultural land could be lost as a result of development in this location.

The landowner is committed to maintaining an influence over the standard of design. This scale of development should support the delivery of a mix of housing types and tenures including making provision for new Gypsy and Traveller pitches. The scale of the proposed development should be sufficient to provide a full range of local facilities to create a sustainable new neighbourhood. New facilities could also be accessible to residents in the adjacent Garden Village neighbourhood area and development in this location would have good connectivity to recent new development in this part of Hatfield. ***Land in this location is considered suitable to take forward as a broad location for housing growth.***

D: West of the redeveloped part of Hatfield Aerodrome (PG36): Originally identified in the Issues and Options Paper as having an estimated capacity for 3,300 to 4,800 new homes involving more than one landowner. One landowner no longer wishes to proceed with development in this location. The location is currently considered to be suitable for around **1,400** dwellings.

The proposer envisages improvements to walking, cycling, and public transport and highway networks. Development could be phased allowing for minerals at the southern end of the site to be worked first. The scale of development would be sufficient to support the delivery of a mix of housing types and tenures including making provision for new Gypsy and Traveller pitches. The proposer has suggested that some housing could be purpose built for the buy-to-let market.

The Green Belt boundary being proposed would be artificial. Development here raises concerns about the potential loss of part of Ellenbrook Fields Country Park. Clarity would be required about the re-provision of green infrastructure for this area if part of the Country Park was lost.

The landscape in this location has been assessed as being highly sensitivity to change with a low capacity to accommodate development. Its poor relationship to existing development would be a barrier to good connectivity between existing and new communities. Development here would need to address issues of capacity at both junctions 3 and 4 of the A1M, sewage, transport and primary and secondary schools capacity. Its distance from town and neighbourhood centres would make the provision of a neighbourhood centre important to ensure that a new community would not have to travel for all of its day to day needs. It is a Preferred Area for Mineral extraction and development could not take place until minerals have been extracted. Land in this location (SHLAA reference: Hat2) offers less potential than some other locations and ***should only be***

considered suitable as a broad location for housing growth beyond the plan period if the issues identified could be satisfactorily addressed.

D (variation): West of the redeveloped part of the former Hatfield Aerodrome (PG36a). The majority of this broad location would fall within the district of St Albans and it is not within the power of Welwyn Hatfield borough council to bring forward land outside of its administrative boundaries. However, at the time the Issues and Options Paper was published in 2009, the East of England Plan provided a strategic policy framework which would have allowed for some of Welwyn Hatfield's growth to be delivered in the neighbouring district of St Albans, if this were to emerge as a preferred option. An option to this effect was set out in the Issues and Options Paper. The relevant part of the East of England Plan, which referred to the possibility of some of Welwyn Hatfield's housing requirements being met within the administrative area of St Albans, was struck out following a decision in the High Court in 2009. In July 2007, St Albans District Council carried out an Issues and Options consultation. This included eight areas of search including Area of Search 5 (East of St Albans) and Area of Search 6 (Smallford). In its emerging Core Strategy in 2009, it stated that it would not pursue Area 6 (Smallford). It has subsequently decided not to pursue Area 5. This location does not adjoin the existing urban boundary of Hatfield and would be separated from Hatfield by the Ellenbrook Fields Country Park. ***Land in this location is not considered to be suitable to take forward as a broad location for housing growth.***

E: West of Ellenbrook and Roehyde (PG37): This location was originally identified in the Issues and Options Paper as having an estimated capacity for 2,100 to 2,900 new homes. However, most of the area being promoted for housing lies outside Welwyn Hatfield, being within the administrative area of St Albans District Council. This location would be severed from Hatfield by the A414 and A1(M) and there are known highway constraints with access to sites from the A414. Landowners have latterly proposed a number of smaller sites within the broad location. Three areas (SHLAA references: Hat6, Hat7 and a combined area of Hat8, Hat9 and Hat10) with an estimated capacity of 290 were assessed as unsuitable in the initial sieving stage of the Strategic Housing Land Availability Assessment. Three other areas (SHLAA references: Hat3, Hat4 and Hat5) have also been promoted. Development within part of this broad location would have poor accessibility to schools, shops or GP services. Access to two of these areas may be difficult to achieve. The three sites (with a combined capacity of 695 dwellings, 60 of which would not be within the borough) are not connected to each other and would not create sufficient capacity to deliver a sustainable new neighbourhood. ***This majority of the land in this location is not considered suitable to take forward as a broad location for housing growth.***

However, a small area of land to the south of St Albans Road West (SHLAA reference: Hat3) has potential to accommodate housing development. Land in this location has good access to Hatfield Road and is well served by public transport, making it more accessible to local services and facilities than other land within the rest of the broad location. A small part of the site is within St Albans District Council, but if this land was developed alongside land within Welwyn Hatfield, a defensible Green Belt boundary could be created to the west. The landscape in this area has been assessed as having medium sensitivity to change and medium capacity to accommodate change. There are sewerage capacity problems in this area, so upgrades will be required. Also, local primary schools are at capacity so this matter would have to be addressed as part of any development proposal. The landowner proposes 230 dwellings, however, a figure of 175 dwellings is considered to be more realistic in order to avoid adversely affecting the setting of a grade 2 listed building located to the south east of the site. This total includes **115** dwellings on land in Welwyn Hatfield borough and **60** in St Albans district. ***Land in only one part of this***

broad location is considered suitable to take forward for housing growth as an urban extension to Hatfield.

F: South of Hatfield (PG38): Originally identified in the Issues and Options Paper as having an estimated capacity for 900 to 1,300 new homes. Two landowners have promoted sites within this location. The existing urban boundary is located to the south of the A1001. The northern most part of the broad location would be separated from existing residential development in Hatfield by the A1001. The broad location lies to the west of an employment area to the north of Welham Green village.

Options explored more recently by one landowner suggest that land could be released from the Green Belt for development, retaining a swathe of land, which is a wildlife site (WS100) (SHLAA reference: WeG9), to the north of Welham Green and a gap between the northern most part of the location and the A1001. Three development options have been suggested with an estimated capacity of 500 to 800 dwellings (although a capacity of **340** dwellings is considered to be a more realistic estimate by the local planning authority) (SHLAA reference: WeG8). Two options include a proposal for a waste treatment facility. Two options assume that an existing school will remain in situ. Opportunities for housing would be constrained by access arrangements and would be dependent upon whether or not a proposed waste facility is built. However, the indications are that if the waste facility were to be built, the road serving this location would be unlikely to have sufficient capacity to accommodate housing as well; hence the capacity for housing could be zero. If the waste facility is not built, the major landowner has indicated that they would consider using this area for the provision of a secondary school to meet an increasing need for school places in Hatfield.

The landscape at this broad location has been assessed as having medium sensitivity to change and medium capacity to accommodate change. A second landowner would consider putting land within their ownership forward if there was a willing development partner. However, this area, which adjoins a residential area of Welham Green village to the south, is a designated wildlife site and is not considered suitable for development.

Discussions with the major landowner have thrown considerable doubt on whether or not housing could be achieved in this location, particularly if the waste treatment facility were to be built. Currently there is considerable uncertainty as to whether this potential broad location would be available or deliverable for housing.

Even if it were to become available over the plan period, part of the broad location is designated as a Wildlife Site and the remaining part of this broad location would be detached from both Welham Green and Hatfield resulting in an incoherent Green Belt boundary and the estimated number of dwellings would not create sufficient capacity to deliver a sustainable new neighbourhood. ***Land in this location is not considered suitable to take forward as a broad location for housing growth.***

iii. **BROAD LOCATIONS FOR GROWTH AROUND THE EXCLUDED VILLAGES**

Consultation responses: Representations made in response to the Issues and Options consultation raised the following issues in relation to the potential broad locations for growth around the borough's excluded villages.

G: Welham Green (PG39): The area was noted as being prone to flooding, it would be segregated from Welham Green by the railway, the railway only has a slow service, so commuters would be tempted to drive to Potters Bar and Potters Bar is likely to be more attractive as a place to shop than Hatfield town centre. The scale of development proposed may discourage mixed-use development.

H: Brookmans Park (PG40): There was a general feeling that extensions to Brookmans Park would result in much travel being generated to reach shops, jobs and services located in nearby towns. Concerns were raised about run-off, with the potential to cause flooding elsewhere, the need to provide additional physical and social infrastructure (for example, local schools are all full) and part of the broad location is severed from the village by the railway line.

I: Cuffley (PG41): Objections centred on the lack of public transport or jobs in Cuffley and lack of capacity at schools. There were also concerns that roads flood, that the character of the village would be spoiled and that attractive countryside would be lost.

Support for development here centred on the view that land was available and that Cuffley already has a good range of services, employment and transport links. Some respondents thought that Cuffley would be better suited to minor growth rather than major growth.

I: South and north-west of Welwyn (PG42): Objections focussed on the impact on the unique character of Welwyn and the importance of the role of the Green Belt in this location. There was support for the development of various sites in this broad location.

K: Oaklands and Mardley Heath (PG43): Estimated capacity of 200-300 new dwellings.

Concerns raised included the availability of limited public transport, no natural centre, the lack of services and the impact on wildlife designations. Breaching the Green Belt boundary to the west of the A1(M) was not supported.

L: North of Woolmer Green (PG44): Estimated capacity of 100-200 new dwellings. Concerns were expressed about the potential for coalescence with Knebworth, the ability of local roads, sewers and community facilities to cope with additional housing; that further housing growth would not be sustainable and that recent development has led to the loss of land previously in employment use.

M: Little Heath (PG45): Estimated capacity of 100-200 new dwellings. There were 1,118 objections submitted on standard response forms to development in this broad location. Concern was raised about coalescence between Potters Bar and Little Heath as well as the adequacy of existing local sewerage and water pressure and the area being too far from Potters Bar town centre to be easily accessible on foot. The potential loss of habitats, a sports pitch and agricultural land together with a lack of capacity at the local primary school was also raised.

N: Digswell (PG46): Estimated capacity of 100-200 new dwellings. Concerns here related to limited amenities, overcrowded trains, congestion, new homes at higher density would spoil the character of the village, loss of countryside and amenity for walkers, visual impact on the Mimram valley, encroachment, impact on the setting of Tewin Water House, increased run-off, impact on wildlife sites and SSSI and disproportionate growth to the size of the village.

The council's review of the broad locations around the excluded villages

G: Welham Green (PG39): Originally identified in the Issues and Options Paper as having an estimated capacity for 600 to 900 new homes. Two sites within this broad location are currently being promoted but the landowners involved are not currently working together.

One area, in the centre of the broad location is being promoted for 150 to 170 dwellings. A more realistic capacity would be **80** dwellings (at 30 dph). The location is well served by the local road, rail and bus network, but access arrangements will need to be resolved. Much of this area would be a considerable walking distance from the village centre, e.g. 1 mile in parts, which could lead to a reliance on car based journeys. The proposer indicates that development here can make contributions to education provision (although the village primary school is at capacity) and

deliver between 30 and 35% affordable housing. Part of the landscape has been assessed as having medium sensitivity to change and medium capacity to accommodate change, whilst other parts of the landscape have been assessed as having a low degree of sensitivity and a high capacity to accommodate development. On its own, the release of this area from the Green Belt would result in an incoherent Green Belt boundary and housing development which would be severed from Welham Green by the railway line. A more coherent Green Belt/settlement boundary would only occur if this site came forward with adjacent land to the south. Landowners are not currently working together.

The second area of land is located further south, closer to the village and is also well served by the local road, rail and bus network, but the suitability of access arrangements would need to be resolved. This area suffers from poor ground conditions and drainage, and is susceptible to surface water flooding. Upgrades may be needed to increase capacity at the relevant waste water treatment works and other associated infrastructure. The diversion of overhead HV cables and the provision of new substations may be required or desirable. This is too small an area to provide new facilities and development here would therefore rely upon existing village facilities. The area has an estimated capacity for around **120** dwellings. This landowner has also promoted the idea of a larger area of land being removed from the Green Belt which would include both of the sites mentioned here but this larger area would represent major growth, disproportionate to the size of the existing village. ***Two areas of land at this location are considered suitable to take forward for housing as a village extension***, although it may prove challenging to define a new Green belt boundary and there are accessibility and site constraints to overcome (SHLAA references: WeG4a and WeG4b).

A further area has also been promoted (SHLAA reference: WeG5). This small area has a capacity for around **20** dwellings and does not adjoin an urban boundary. ***This area of land is not considered suitable to take forward as a village extension.***

H: South and west of Brookmans Park (PG40): This is a very large broad location to the west and south of Brookmans Park involving more than one landowner with an estimated capacity for 2,600 to 3,900 new homes at the time of the Issues and Options Paper in 2009. The location (SHLAA references: BrP3, BrP4, BrP5, BrP6, BrP7, BrP8, BrP16) contains wildlife sites and land to the west is close to an SSSI (Water End Swallow Holes). Parts of the broad location are adjacent to an historic park and garden and parts fall within Flood Zones 2 and 3. A major landowner has more recently promoted a smaller amount of development on two areas of land; one, immediately to the west of the village (BrP4) with an estimated capacity of around **550** dwellings (at 25 dph) and the other, smaller area of land, immediately to the south of the village (BrP6). The landowner sees expansion to the west and south as logical extensions to the village. The area to the west would be separated from the rest of the village by the railway and only accessible via a narrow road over a bridge on a tight bend. The landscape in this area has been assessed as having medium to high sensitivity to change and low capacity to accommodate new development. Development to the west of the railway line would result in urban encroachment into the countryside and have a significant impact on openness. Development on this scale would represent major growth, disproportionate to the size of the existing village. ***The area to the west of the railway line is not considered suitable to take forward as a village extension.*** (BrP4)

The smaller area to the south of the village (BrP6) would be accessible to the village centre. The village has a secondary school and a primary school, although capacity could be an issue. This area could be developed whilst creating a defensible Green Belt boundary with roads to the south and east and the railway line to the west, which would provide a defined limit to the expansion of the village. Account would need to be taken of the potential for flooding along the northern boundary of the site. The landscape in this area has been assessed as having medium sensitivity

to change and medium capacity to accommodate new development. This area has an estimated capacity of **230** dwellings. ***Land in this location is considered suitable to take forward as a village extension.***

Further land (SHLAA references: BrP9 and BrP10) involving two landowners, also to the south of Brookmans Park, has a combined estimated capacity for around **290** dwellings (190 and 100). One co-owner wishes to promote an element of self build housing on the site. Both landowners are prepared to investigate the provision of affordable housing and contribute to green infrastructure through the possible provision of a Jubilee Wood to the south and planting in the north to protect Gobions Wood. The landscape in this area has been assessed as having a high sensitivity to change and low capacity to accommodate new development. It is difficult to see how satisfactory development could be achieved in this location given its proximity to Gobions Historic Park and Garden (part of which contains Gobions Wood Wildlife Site) and Moffats Meadow wildlife site, which separates the site from the rest of the village. The development of this part of the broad location for housing would result in an unusually shaped urban form/Green Belt boundary with the wildlife site being surrounded on three sides. ***Land in this location is not considered suitable to take forward as a village extension.***

I: South and West of Cuffley (PG41): This is a very large broad location to the south and west of Cuffley involving more than one landowner with an overall estimated capacity for 1,700 to 2,500 new homes at the time of the Issues and Options Paper. Estimates have been reviewed (see below).

One part of this location is situated to the west of Cuffley. Estimated capacity is around **435** dwellings (SHLAA reference: Cuf4). It contains an Area of Archaeological Significance and is adjacent to a Wildlife Site. Part of the land in this location is within flood zones 2 and 3a and is subject to potential overland flow. The landscape has been assessed as highly sensitive to change with low capacity to accommodate development, with evidence of badger setts. Capacity issues for the foul sewer network would need to be explored. Parts of this location would be remote from the village centre/train station; likely to result in an increase in car journeys. Development here would lead to a large and incoherent expansion of a well defined and contained village. There are concerns over whether local primary school provision has the capacity to accommodate the increased demand for school places that could arise from this scale of development. There is no secondary school in this village. Development here would seriously compromise the openness of the Green Belt. The scale of development would represent a major expansion to the village. ***Land in this location is not considered suitable to take forward as a village extension.***

A second area lies to the west and south west of Cuffley with an estimated capacity for around **400** dwellings (SHLAA reference: Cuf5). Land would be available relatively quickly and the scale of development should support the delivery of a mix of housing types and tenures. Indications are that upgrades would be required to sewage infrastructure. The promoter considers the site to be a logical extension to the village. However, such an extension would in fact lead to a large and incoherent expansion of a well defined and contained village. There are concerns over whether local primary school provision has the capacity to accommodate the increased demand for school places that could arise from this scale of development. There is no secondary school in this village. Capacity issues for the foul sewer network would need to be explored. The landscape has been assessed as highly sensitive to change with a low capacity to accommodate development without extensive degradation of character. The local topography would mean that development would be highly visible from the west and south, representing a significant encroachment into the countryside and seriously compromising the openness of the Green Belt. The steep topography also gives rise to potential overland flooding. Badger setts have been identified on this site.

Development here is likely to increase car based journeys. The scale of development would represent a significant expansion to the village. ***Land in this location is not considered suitable to take forward as a village extension.***

A smaller area of land to the south of Cuffley (SHLAA reference: Cuf6) provides an opportunity for development in close proximity to existing village facilities and adjoins a primary school. It has good levels of accessibility, including for pedestrians to transport services. The landscape in this area has been assessed as having medium sensitivity to change and medium capacity to accommodate new development. Potential to create a defensible Green Belt boundary to the southern edge of the village, with limited impact on the wider landscape and the size of the village. It has a capacity for around **130** dwellings. ***Land in this location is considered suitable to take forward as a village extension.***

Two further areas of land, one to the north-west (SHLAA reference: Cuf8) and one to the south-west (SHLAA reference: Cuf7) of Cuffley, also fall into this broad location. One area is designated as a Wildlife Site and the other does not adjoin the existing settlement boundary and could only come forward as part of a much larger area, if this were considered suitable. ***These areas are not considered suitable to take forward as village extensions.***

J: South and north-west of Welwyn (PG42): This potential broad location was identified in the Issues and Options Paper as having an estimated capacity for 500 to 700 new homes. Six separate sites have been promoted within this broad location around Welwyn make up this broad location. Capacity estimates have been reviewed. A seventh site has subsequently emerged on a Major Developed Site.

(1) An area (SHLAA reference: Wel1) with the capacity to accommodate around **220** dwellings. This is an undulating, rural, site, rising to the west where the landscape is clearly visible from countryside to the west, although the site is not higher than housing to the north and south. It adjoins medium density housing, a cemetery, open countryside and a road. New access arrangements would be essential for this area to be developed as roads in the area are very narrow. A new bridge has been mentioned but it is not clear where this could be positioned and the landowners do not have control over land that would be needed to make such provision. A viable access route cannot be guaranteed to be secured. ***Land in this location is not considered suitable to take forward as a village extension.***

(2) An area (SHLAA reference: Wel2) with the capacity to accommodate around **70** dwellings. It adjoins a cemetery to the south and east, and a church to the west. It faces fairly low density housing. The landscape is lower than the ridge of housing to the north, but slopes to the south. Access would be difficult as roads in the vicinity are very narrow. ***Land in this location is not considered suitable to take forward as a village extension.***

(3) A small previously developed site (SHLAA reference: Wel3) located on a narrow lane with the capacity to accommodate around **10** dwellings. Land is available. This is a small site, which has been assessed as being suitable and deliverable but on its own could not be considered to be a broad location for growth and ***is considered suitable for development*** but only if small scale Green Belt releases around Welwyn is considered necessary as part of an overall strategy for growth in order to deliver housing in Welwyn village over and above any other suitable opportunities, which would not in themselves require an amendment to Green Belt boundaries.

(4) An area of land (SHLAA reference: Wel4) located between the A1(M) and B197 that slopes towards motorway, which it abuts. Development here would be affected by motorway noise. An estimated capacity of **20** dwellings takes into account the need to incorporate acoustic barrier measures. Such a small location could not be considered as a broad location for growth and

concerns remain about the proximity of this location to the A1(M) and the ability to create a healthy living environment for future residents due to the impact of noise pollution and whether an acoustic barrier would be an acceptable feature in the landscape given its highly visible location when viewed from the A1(M). ***This part of the potential broad location is considered suitable*** but only if small scale Green Belt releases around Welwyn is considered necessary as part of an overall strategy for growth in order to deliver housing in Welwyn village over and above any other suitable opportunities, which would not in themselves require an amendment to Green Belt boundaries.

(5) An area with the capacity to accommodate around **160** dwellings. The area (SHLAA reference: Wel5) adjoins fairly high density housing and backs onto a row of bungalows. There is a possible access point but this is not likely to be suitable for large scale development as the road is quite a narrow residential road. The alternative is a narrow country lane which would be unsuitable for vehicular access. The landscape is open and undulating, sloping up to the east. The site is very visible from the countryside to the west and north-west. The area closest to the tennis courts is more enclosed and less visible. A tree belt borders the site to the east and a footpath cuts across. Power lines cross the site and there is some road noise from the A1(M). ***Land in this location is not considered suitable to take forward as a village extension.***

(6) An area (SHLAA reference: Wel6) with capacity to accommodate around **96** dwellings. Half of the site is in the adjoining district of North Hertfordshire. The site sits low in the landscape relation to surrounding development. Access would be via a narrow lane and could not support access to this scale of development. ***Land in this location is not considered suitable to take forward as a village extension.***

K: Oaklands and Mardley Heath: This village has a small service centre with limited services and facilities. Potential opportunities in a number of locations have been reviewed (SHLAA references: OMH3, OMH4, OMH6) but are not considered to be suitable or deliverable because they are either not being promoted, are designated as a wildlife site, do not adjoin an existing urban boundary. A small location (SHLAA reference: OMH5) with an estimated capacity for around **20** dwellings is also being promoted on rear garden land in close proximity to the A1(M). Development could be limited by noise impact and deliverability may be affected by multiple ownerships. ***Development in this part of the broad location only is considered suitable*** but only if the release small scale Green Belt sites around Oaklands and Mardley Heath is considered necessary and appropriate as part of an overall strategy for growth around excluded villages with small service centres.

L: North of Woolmer Green: This village has a small service centre with limited services and facilities. A number of locations have been reviewed. One area is not being promoted (SHLAA reference: WGr2) and one area would result in coalescence between the villages of Woolmer Green and Knebworth (SHLAA reference: WGr3). A large area is being promoted which could be available quickly. If development were to be limited to the extent of frontage development to London Road, the area (SHLAA reference: WGr1) would have capacity for around **200** dwellings. This would comprise a large extension to a small village, expanding the scale of the village by a disproportionate 33%. ***Land in this location is not considered suitable to take forward as a village extension.***

M: East of Little Heath: Estimated capacity for around **140** dwellings (SHLAA reference: LHe2). Not being actively promoted. Access not demonstrated. ***This location is not considered suitable to take forward for housing growth.***

N: East of Digswell: Capacity for around **170** dwellings. Achieving access has not been demonstrated. Digswell has a limited range of facilities and new development would be of

insufficient size to generate new facilities. This location (SHLAA reference: Dig1) is not being actively promoted and is not considered to be suitable or deliverable. ***Land in this location is not considered suitable to take forward as a village extension.***

Appendix B

OTHER BROAD LOCATIONS OUTSIDE THE BOROUGH

Land to the east of Welwyn Garden City on land within East Herts: This location does not fall within Welwyn Hatfield but development in this location would effectively result in an extension to Welwyn Garden City.

This location comprised part of option E in the East Herts Issues and Options Paper in 2010. (The other part to option E was for housing growth to the east of Stevenage). East Herts officers' reported the responses to consultation to the East Herts Executive Panel on 7th July 2011. In respect of option E, the report states: "There was broadly equal support and objection to Option E (Towns, east of Stevenage and east of Welwyn Garden City) with respondents acknowledging the benefits of large scale urban extensions, but raising concerns with infrastructure (especially water), the relationship to the existing towns and impact on the Green Belt."

It is considered that land in this broad location would relate well to the eastern side of Welwyn Garden City and would help to support economic growth in the town. Should this location be identified in the East Herts Local Plan as a Broad Location for Growth, development here could contribute towards Welwyn Hatfield's housing target should there prove to be a shortfall in housing land opportunities in the borough, both during and beyond the plan period.

Welwyn Hatfield Core Strategy Options for Broad Locations for Growth

