

Housing and Economic Land Availability Assessment

December 2019

(Addendum to the HELAA 2016)



Front cover:

Illustration of the broad location of sites promoted through the Call for Sites 2019.

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1. Introduction

The Housing and Economic Land Availability Assessment 2019

- 1.1 In 2016, the council published its Housing and Economic Land Availability Assessment (HELAA). This formed part of the evidence base, which was used along with other technical work, to inform the allocation of sites in the Draft Local Plan Proposed Submission 2016.
- 1.2 The Draft Local Plan was submitted to the Secretary of State for examination in May 2017. An independent inspector was appointed to examine the soundness of the submitted plan. Hearing sessions commenced in September 2017 and several hearing sessions relating to the submitted plan, plus a joint hearing session with East Herts. District Council, have already been held.
- 1.3 Whilst the Draft Local Plan contains sufficient sites for around 12,000 additional homes in the borough, (equivalent to an average of 632 dwellings per annum), the housing need is acknowledged to be higher (800 dwellings per annum). As the submitted Plan does not meet the identified need for housing, the inspector asked the Council to investigate if there would be any scope for additional housing sites to be identified.
- 1.4 To assist in this, a 'Call for Sites' was held between 7th January and 4th February 2019. Over 140 sites were promoted for either housing, employment, mixed-use or other forms of development.
- 1.5 This iteration of the Housing and Economic Land Availability Assessment (the HELAA 2019) reviews the sites promoted through the Call for Sites in 2019. Some of these sites were previously assessed in the HELAA 2016. Other sites were newly promoted in 2019.
- 1.6 The primary aims of this document are to set out:
 - The assessment of the suitability, availability, achievability and deliverability of sites promoted through the Call for Sites 2019 with potential for housing (including any potential for Gypsy and Traveller related development), or employment (B class use) related development, or for a standalone primary school; and
 - The council's latest windfall assessment.
- 1.7 In addition, for ease of reference and to assist with the overall review of potential development capacity in the borough, Appendix 3 and 4 of this document set out:
 - Where any additional capacity has been promoted for sites already proposed for allocation in the submitted Draft Local Plan 2016 and the planning authority's conclusions on this; and

- Where more recent information has been provided, which may affect estimates of delivery for sites already proposed for allocation in the submitted Draft Local Plan 2016 and the planning authority's conclusions on this.
- 1.8 This 2019 HELAA does not replace the 2016 HELAA. This 2019 document should be read as an addendum to the 2016 HELAA, as not all parts of the 2016 HELAA are replicated in this document.
 - 1.9 However, the HELAA 2019 does contain an update on the latest windfall assessment and provides a summary of the council's latest evidence around delivery rates for housing development in the borough. This is referenced when considering delivery estimates for sites that are considered to be suitable, available and achievable in this HELAA.
 - 1.10 It is important to note that the HELAA does not determine which sites should be allocated in the Local Plan. It is the role of the HELAA to provide information on the range of sites which are (in principle) suitable, available, and achievable to meet development needs, but it is for the development plan process to determine which of those sites are the most suitable to meet those needs.
 - 1.11 Decisions on which sites will be taken forward as proposed site allocations in the Draft Local Plan will be informed by a Housing and Employment Sites Selection Background Paper. This takes forward the result of the HELAA to consider (inter alia) other strands of evidence, the outputs of the Sustainability Appraisal, and any key infrastructure constraints.
 - 1.12 It is also important to note that this is a high-level assessment and therefore, consistent with PPG advice (paragraph 005 reference ID 3-005-20140306), the level of assessment is proportionate to the plan-making process. This means that whilst multiple issues have been considered, the HELAA does not go to the level of detail that would be expected with a planning application. It is nevertheless, sufficiently thorough to identify whether there are any *in principle* reasons as to why a site would not be considered suitable to take forward to the next stage of the site selection process or to identify any matters which may limit the estimated development potential of a site in some way, e.g. the extent of a developable area, the capacity of a site or the timing of delivery.

2. Spatial context

- 2.1 Welwyn Hatfield borough is located centrally within Hertfordshire and covers an area of approximately 130 square kilometres. It is bordered by Hertsmere to the southwest, St Albans to the west, North Hertfordshire to the north and East Hertfordshire and Broxbourne to the east. The very south of the borough borders the London Borough of Enfield. The Metropolitan Green Belt currently

covers 79% of the borough. The borough has two main towns, Welwyn garden city and Hatfield. Both are new towns and Welwyn Garden City is one of two Garden Cities in the UK. There are also several smaller settlements, which are excluded from (not in) the Green Belt. They are Brookmans Park, Cuffley, Digswell, Little Heath, Oaklands & Mardley Heath, Welham Green, Welwyn, and Woolmer Green. The borough also contains some small villages, hamlets and areas of sporadic or ribbon development, which are all currently located in the Green Belt (washed over).

2.2 The HELAA 2016 provides further context on this.

3. National Policy context

- 3.1 Consistent with the National Planning Policy Framework (NPPF) 2019, *Annex 1: Implementation (paragraph 214)*, the policies in the previous NPPF (March 2012), apply for examining plans, where those plans were submitted on or before 24 January 2019.
- 3.2 As the Welwyn Hatfield Draft Local Plan 2016 was submitted prior to this date, the references that follow relate to the NPPF 2012¹ and the associated Planning Practice Guidance 2014² (unless otherwise stated).
- 3.3 To boost the supply of housing, paragraph 47 of the NPPF 2012 states that local planning authorities (LPAs) should use their evidence base to ensure that their local plan meets the full objectively assessed development needs, as far as is consistent with the policies set out in the Framework.
- 3.4 Consistent with the footnotes to paragraph 47 of the NPPF 2012, LPAs should identify a supply of specific deliverable³ sites (in summary, sites that are available and in a suitable location for development now, be achievable and viable, and with a realistic prospect that housing can be delivered within 5 years). They should also identify a supply of specific, developable sites (sites that are in a suitable location with a reasonable prospect that the site is available and could be viably developed at an envisaged point) or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
- 3.5 The definition of 'deliverable' was amended in NPPF (2) (Annex 2 – Glossary, 2019). The first part of the definition remains largely unchanged (sites for housing should be available and offer a suitable location for development now, be achievable with a realistic prospect that housing will be delivered

¹ NPPF 2012: Archived document:

<https://webarchive.nationalarchives.gov.uk/20180608213715/https://www.gov.uk/guidance/national-planning-policy-framework>

² Planning Practice Guidance: Housing and economic land availability assessment 2014: Archived document:

<https://webarchive.nationalarchives.gov.uk/20190607102654/https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

³ Full definition within footnote 1 to paragraph 47 of the NPPF

within 5 years) with the loss of the phrase “ *and in particular that development of the site is viable.*” The remaining part of the definition in footnote 1 has been replaced by sub-paragraphs (a) and (b) in the NPPF 2019 definition of ‘deliverable’. Sub-paragraph (b) includes within the definition that, where a site has been allocated in a development plan, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

- 3.6 Whilst the Draft Plan falls to be examined against the NPPF 2012, for decision making purposes, planning applications fall to be examined against the NPPF 2019. Further, on the point of adoption of the Plan, it is recognised that consistent with the NPPF 2019, there should be sufficient evidence to demonstrate the *clear evidence* that an allocated site is deliverable. With this in mind, at the Call for Sites Stage, the LPA requested information from promoters on their anticipated delivery rates and timescales. Further, the LPA has updated its evidence around delivery timescales, using a sample of just over 600 planning permissions. Section 4 of this HELAA explains more about this evidence, which has been taken into account when assessing the likely delivery timescales of sites that are found suitable, available, and achievable in the HELAA. This body of information combines to provide the evidence of where sites are considered to be deliverable.
- 3.7 In terms of windfall allowance, LPAs may make an allowance for windfall sites (including within their five year supply) if they have compelling evidence⁴.

The preparation of a land availability assessment

- 3.8 In order to help identify if it would be possible for the Council to meet its full assessed need for housing and to inform the development strategy over the plan period, it is therefore important that potential sites are identified and considered for their development potential.
- 3.9 In this respect, paragraph 159 of the NPPF 2012 states that a Strategic Housing Land Availability Assessment should be produced to ‘*establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.*’
- 3.10 Regarding employment land, paragraph 21 of the NPPF states that in drawing up local plans ‘*...local planning authorities should...set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*’. As part of the site selection process, the council will take account of recent economic forecasts in addition to the evidence around recent gains and losses of employment land, windfall trends and projections. Consideration will also be given to the need to balance employment provision with the supply of housing.

⁴ Paragraph 48 NPPF 2012

- 3.11 Planning Practice Guidance (PPG) 2014 sets out a broad methodology for undertaking a Housing and Economic Land Availability Assessment to identify a future supply of land which is suitable, available, and achievable for housing and economic development uses over the plan period.
- 3.12 It advises LPAs to take a stepped approach to the identification and assessment of possible development sites and how the conclusions of this assessment should be factored into the wider evidence base that informs the allocation of development sites, as illustrated in Figure 1.

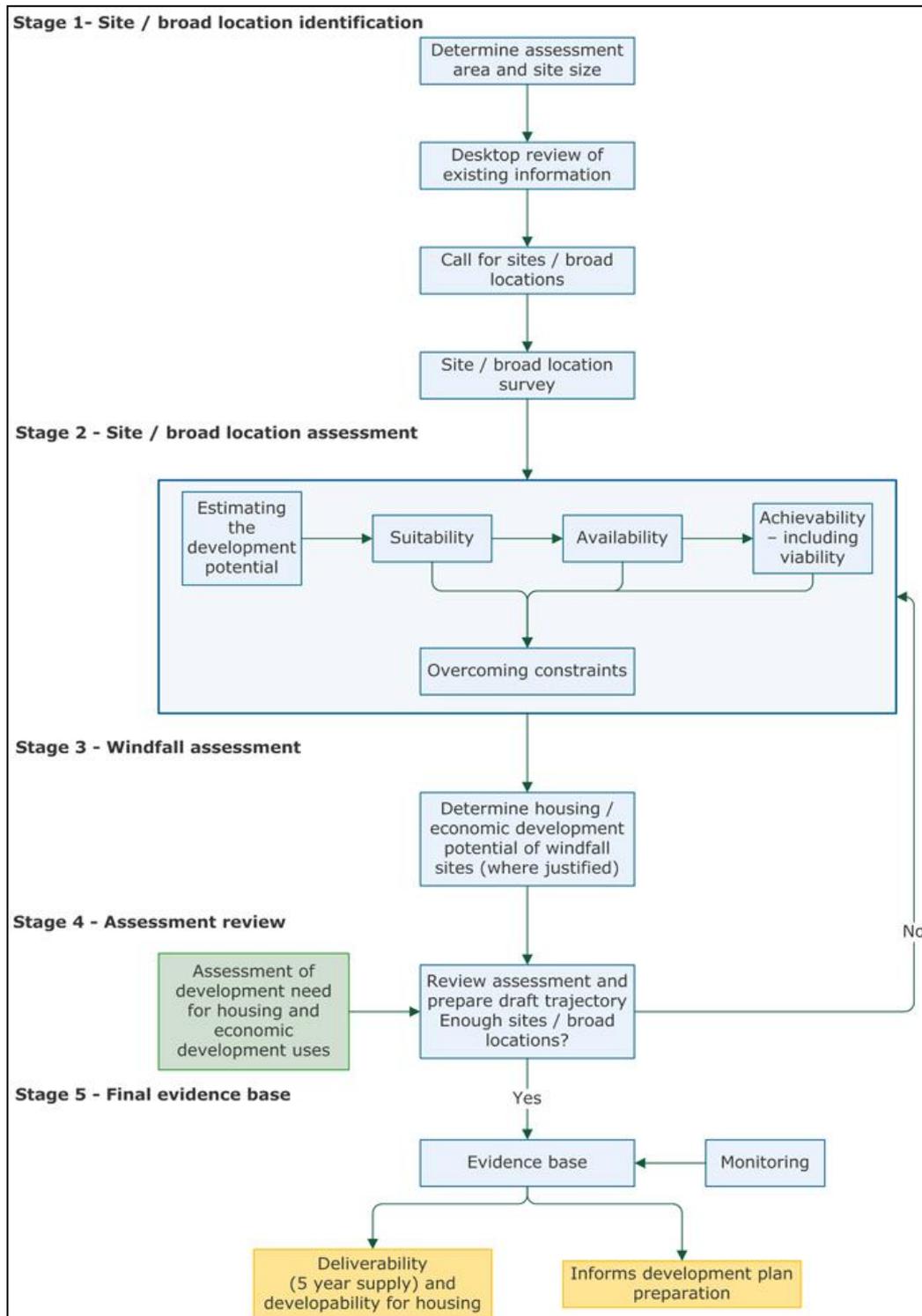
Gypsy and Traveller sites

- 3.13 National Planning Policy for Traveller Sites (PPTS) August 2015 states that LPAs should set pitch targets for gypsies and travellers to address the likely site accommodation needs of travellers in their area, and (in summary):
- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
 - identify a supply of specific, developable sites, or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
 - relate the number of pitches or plots to the circumstances of the specific size and location of the site;
 - protect local amenity and environment;
 - ensure that traveller sites are sustainable (economically, socially and environmentally); and
 - when assessing the suitability of sites in rural or semi-rural settings, ensure that the scale of such sites does not dominate the nearest settled community
- 3.14 The submitted Draft Local Plan 2016 makes provision for the level of need identified at the time of submission to 2032. The evidence base will need to be reviewed during the plan-period and delivery beyond 2027 will be informed by any relevant update. However, there is a possibility that an additional need for pitches may arise as a result of the need to revise the plan period. Further, planning applications have been received for two sites, which would in combination, and if approved, result in a slightly lower pitch delivery (by 2 pitches) than that proposed for allocation. In addition, the deliverability of one small site (for 1 pitch) is now not certain. This could potentially lead to a shortfall of three pitches before 2022. As a result of this, the LPA has considered the one site promoted for Gypsy and Traveller development through the Call for Sites 2019.

4. Methodology

- 4.1 The previous HELAA 2016 was based on the methodology set out in Planning Practice Guidance (PPG), which uses a stepped approach. This 2019 HELAA is based on the same broad approach.

Figure 1: Methodology flow chart in PPG



How our methodology differs from Planning Practice Guidance

- 4.2 As in the 2016 HELAA, this 2019 HELAA assesses sites at the Welwyn Hatfield Borough level, not across the whole housing market area defined in the Council's SHMA.
- 4.3 Further, no broad location survey or assessment has been carried out. The Inspector's letter to the Head of Planning dated 24 October 2018 (EX91B) commented on this potential scenario (to accommodate some development needs beyond 10 years). Whilst this approach would be Framework compliant, it was not considered by the Inspector to "*be as easy to undertake or justify as the release of sites to meet a specific identified need*".
- 4.4 The Council's Cabinet Planning and Parking Panel subsequently agreed on 6th December 2018, to undertake a new Call for Sites, to publish the sites for public comments, and to undertake the appropriate analysis of such sites before taking a decision on whether any additional sites would be submitted to the examination. The HELAA forms part of this analysis.

Differences between the 2019 and the 2016 methodology

- 4.4 Recognising the shortfall between the housing target in the Draft Local Plan 2016 and the assessed level of the need for housing in the borough, in this 2019 HELAA, the methodology has been updated to take account of the need to consider a wider potential pool of sites than was previously considered in the 2016 HELAA.
- 4.5 Updates include allowing for the assessment (at Stage 2 of the HELAA), of sites which fall within a designated or proposed Employment Area and sites in some of the borough's washed over villages or settlements. (In 2016, such sites would have failed at Stage 1 of the HELAA). Such changes mean that the HELAA considers the capacity for development from a broader range of sites than previously considered in 2016, to help explore the potential for increasing housing land supply alongside any opportunities for employment (B class use) development, or for a standalone primary school site (the level of additional housing growth being considered, may give rise to the need for additional school site provision).
- 4.6 The methodology applied in 2019 is set out on the following pages.

Step 1 – Identification of assessment area and sites

- 4.7 The assessment area comprises the Borough of Welwyn Hatfield. Sites referred to in this HELAA 2019 are those promoted through the most recent Call for Sites event, which was held between the 7th January and 4th February 2019. Over 140 sites were promoted, some of which had previously been promoted at an earlier stage in the plan-making process. Other sites were promoted for the first time in 2019.
- 4.8 Sites that were promoted for the first time in 2019, have been subject to the staged HELAA process as described in the methodology below. Sites that were previously reviewed in the 2016 HELAA and re-promoted in 2019, have been reviewed in this 2019 HELAA to take account of any key changes relating to the methodology, the nature of the promotion in 2019 (e.g. a change in site area), or comments received from key technical consultees. Depending on the nature of any changes to the methodology or any other matters noted, this may result in a change to an earlier conclusion around suitability, availability, achievability, or deliverability.
- 4.9 In addition, several promoters of sites which are already proposed for allocation in the Draft Local Plan 2016, have suggested higher capacities (or alternative delivery estimates) should be considered. Where this is relevant, conclusions are presented in Appendix 3 and Appendix 4 of this document.

Step 2 – Site Assessment

Sites that fail at Stage 1 of the assessment process

- 4.10 In the 2019 HELAA, any site which falls into one of the categories below is assessed as having **failed** the Stage 1 Assessment and is not carried through to the Stage 2 assessment:
- a. The site is smaller than 0.25ha and has not been promoted for 5 or more dwellings (the minimum dwelling capacity required for allocation in the Local Plan outside the two main towns), or has not been promoted for employment (B use class) uses or for a standalone primary school site.
 - b. The site is not located within or adjoining an existing urban boundary of a settlement that is excluded from the Green Belt⁵. Exceptions to this are made:
 - i. For sites capable of forming a new settlement in a sustainable location, with a minimum estimated capacity of 1,000 or more new dwellings;

⁵ In order to direct growth to the most sustainable locations within the borough, consistent with the objectives of the NPPF.

- ii. For sites promoted for Gypsy and Traveller development - national policy (Planning Policy for Traveller Sites) allows for the inseting of sites within the Green Belt.
 - iii. Where a site lies within or adjoins the villages and settlements of Bell Bar, Essendon, Lemsford, Newgate Street, Northaw, Stanborough, and Swanley Bar (i.e. those village and settlement areas identified in the LUC Green Belt Study Stage 3 Report EX88A, B, C, D); and
 - iv. For sites that adjoin another site that by itself adjoins a settlement that is already excluded from the Green Belt and which is found suitable, available and achievable in the Stage 2 HELAA assessment.
- c. All, or the majority, of the site is designated as a Special Area for Conservation or Special Protection Area, Site of Special Scientific Interest, Registered Historic Park and Garden, Local Nature Reserve, and/or Local Wildlife Site: This reflects the approach set out within the NPPF and emerging local planning policy to protect nature conservation or historic assets of national or local importance.
- d. The entire site is designated as Flood Zone 3: This reflects the NPPF and local planning policy to protect the functional floodplain and avoid locating development in areas of high flood risk.

Stage 2 site assessments

- 4.11 Consistent with the methodology in the PPG, the suitability, development potential, availability, and achievability of sites which pass the Stage 1 Assessment have been considered in the HELAA. This constitutes the Stage 2 Assessment, which is described below.

Site suitability

- 4.12 When assessing the suitability of a site a number of policy constraints, physical constraints, and potential environmental impacts have been taken into account.

Policy constraints

- 4.13 PPG advises that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy. At the national level, the NPPF and PPG include a number of provisions, criteria, and guidance on matters such as nature conservation, heritage, and flood risk. Key sections of the NPPF have been cited within the 'policy constraints' section of the HELAA site assessments where these are applicable.
- 4.14 Current and emerging development plan policy, including any policy designations (such as Urban Open Land), has also been considered when assessing sites within the HELAA. This principally consists of:

- Saved policies from the Welwyn Hatfield District Plan (April 2005);
- Policies within the Draft Local Plan Proposed Submission 2016;
- Hertfordshire Minerals Local Plan 2002 to 2016 (2007) and, if relevant, the Hertfordshire Proposed Submission Minerals Local Plan 2019;
- Hertfordshire Waste Development Framework (Core Strategy 2012 and Site Allocations 2014);
- Site specific SPDs where they exist; and
- Local Transport Plan 4 (2018-2031).

4.15 In practice, consideration is given to a wide range of policy constraints and objectives. In the HELAA, the emphasis is on a proportionate evidence base to inform the local plan and matters may be identified which, whilst not an absolute constraint to development, may need further review and consideration at the planning application stage.

4.16 However, two policy considerations are given significant weight when assessing the suitability of a site in Stage 2 of the HELAA, and ultimately considering if the site is a potential candidate for allocation within the local plan. These are whether the site provides a community facility or is designated as Urban Open Land.

- Community facility: If the site provides a leisure or community facility, and it has not been demonstrated at this stage that the facility is no longer needed, can be relocated elsewhere, or that partial redevelopment is required to safeguard the facilities future, then the site (or the relevant part of the site) is considered to be unsuitable.
- Urban Open Land: If a site would result in the loss of Urban Open Land (whole or partial) then the site is considered to be unsuitable, unless it can be demonstrated why the designation is no longer valid or how the loss of the Urban Open Land could be overcome or mitigated.

4.17 For clarification, Green Belt policy is 'switched off' for the purposes of the HELAA. Green Belt matters are taken into account at later stages of the site selection process.

Physical and environmental constraints and impacts

4.18 A number of issues are taken into account when assessing the suitability of a site and when considering whether mitigation measures such as landscaped buffer zones, reduced developable areas, and certain design approaches can be implemented if a site is taken forward for future development. The issues may vary from site to site but typically include a consideration of the following:

- Access: the opportunity for and suitability of vehicular and pedestrian access to the site.
- Noise and air pollution: whether healthy internal and external environments are likely to be achieved taking account of sources of noise and air pollution, such as roads, railways, and land uses.
- Contaminated land: whether a site is contaminated and if remediation is considered to be feasible (and viable as part of achievability considerations).
- Land stability: whether a site has known land stability issues and if remediation and engineering solutions are considered to be feasible (and viable as part of achievability considerations).
- Topography: Whether a site is notably steep or undulating and whether the topography would prevent or constrain the opportunity for development to take place; or whether development on all or part of the site would, due to the site's topography, be likely to have an undue impact on adjoining land uses.
- Flooding: Whether the majority of the site is subject to significant fluvial or surface water flood risk, considering the vulnerability of the proposed use, and whether flood risk could be mitigated and managed to an acceptable level.
- Site-specific infrastructure: Any known infrastructure problems associated directly with the site, such as wastewater.
- Hazardous risks: If there are any known hazardous risks to human health.
- Groundwater protection: Whether, without appropriate measures in place, development would result in unavoidable and unacceptable risk of groundwater pollution.
- Landscape (features and characteristics of the site): Impact on notable landscape features or characteristics within or adjoining a site.
- Nature conservation: Impact of development on a designated nature conservation site or habitat(s) or species in general.
- Heritage: Impact on designated heritage assets.
- Residential amenity: If the site would give rise to or be subject to impacts upon residential amenity.
- Impact on other land uses: If the development of a site for residential purposes may give rise to operational issues for pre-existing land uses adjoining a site.

Development potential

- 4.19 The approach taken to the development potential of sites is set out in the HELAA 2016. Examination Document EX69 also provides more detail on gross/net density assumptions. For ease of reference, the density assumptions for Green Belt and Urban housing sites (as applied in the 2016 HELAA and again in 2019 as a starting point) are set out in the tables below:

Table 1: Housing sites density assumptions - Green Belt sites

Site size (hectares)	Gross density (dph)	Net density (dph)
Less than 2ha	40 dwellings per ha	40 dwellings per ha
Between 2 and 6ha	30 dwellings per ha	40 dwellings per ha
More than 6ha	25 dwellings per ha	40 dwellings per ha

Table 2: Housing sites density assumptions – Urban sites

Site size (hectares)	Density scenarios (dph)			
	Baseline	Medium	High	Very high
Less than 2 ha	40dph	50dph	70dph	90dph
Between 2 and 6 ha	30dph	40dph	50dph	70dph
More than 6 ha	25dph	30dph	40dph	50dph

- 4.20 The council may not always agree with a promoted level of capacity, and the assessment of sites may result in a moderated net developable area and capacity assessment. Conversely, the council may consider that should a site be taken forward for allocation, the promoted capacity would fail to make efficient use of land. The site template for each HELAA explains any adjustments where these have been made.

Employment sites

- 4.21 As set out in the HELAA 2016, the HELAA applies (as a starting point) the plot ratios that were set out within the Deputy Prime Minister’s Employment Land Reviews – Guidance Note (2004)⁶:

Table 3: Employment land plot ratio assumptions

Use Class	Plot ratio (floor space to site area)
B1a/b	75% of site area
B1c	40% of site area
B2	40% of site area
B8	50% of site area

⁶ ODPM Employment Land Reviews – Guidance Note (2004)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7722/147540.pdf

- 4.22 For example, a 10 hectare site promoted for B1 a/b use would have a potential employment floor space of 7.5 hectares or 75,000m². However, plot ratios are highly specific to site circumstance and proposed development type and mix, e.g. employment-related development (B class use), may be promoted as part of a residential-led mixed-use scheme for a site. Therefore, the HELAA assessment of potential for employment development may be indicative only depending on the level of information available at the time of assessment. The site template for each HELAA explains the approach taken for each site.

Gypsy and Traveller sites

- 4.23 Previous practice guidance published by the Department of Communities and Local Government (DCLG)⁷ was withdrawn in 2015, but nevertheless provided useful guidance on the design of Gypsy and Traveller sites. It advised that there are no one-size-fits-all measurements of a 'standard' pitch or site and account should be taken of the accommodation needs of different sized households.
- 4.24 The HELAA 2016 provides more background on the work the planning authority has carried out in this respect, but in summary, an average gross pitch size of 678m² (500m² net) is applied (as a starting point) in order to assess pitch potential. This is broadly equivalent to 15 pitches per hectare gross. Any variation on a site by site basis is explained in the HELAA site assessments.

Adjusting the development potential of a site

- 4.25 The methodology for assessing the development potential of sites provides a good starting point. However, in some cases the development potential of a site may need to be adjusted to take of account a relevant site-specific policy, physical, or environmental constraints. This may result in a reduction to the developable area and/or a reduction to the applied density for the site to a level deemed more appropriate based upon the information and advice available to the LPA.
- 4.26 Conversely, on certain sites, particularly for urban sites in highly accessible locations, a higher capacity may be deemed more appropriate, particularly where this can be reasonably benchmarked to other recent developments or where notable progress has been made towards making a planning application, which illustrates that a higher capacity could be achieved.

⁷ DCLG Designing Gypsy and Traveller Sites - Good Practice Guide (2008), <https://www.gov.uk/government/publications/designing-gypsy-and-traveller-sites-good-practice-guide>

Availability

- 4.27 In the HELAA, a site is considered available for development provided, and in light of the information available, there is sufficient confidence that there are no absolute impediments (such as legal or ownership problems), which would prevent development taking place at some point during the plan period. Details relating to land ownership, and leaseholders with an interest in a site, are requested at site promotion stage. Where site ownership information is missing, unclear or potential issues become apparent, land registry searches are undertaken by the LPA.
- 4.28 Where potential problems are identified, e.g. multiple landowners exist and it is unclear if all landowners are willing to bring the site forward, restrictive rights, covenants, agreements or ransom strips, long leases, or operational requirements relating to the land are evident, then these matters are taken into account. It may be that further information can be provided by promoters or interested parties, or that certain restrictions mean that a site is unlikely to become available until later in the plan period. Such matters are reflected in the HELAA site templates where relevant.

Achievability

- 4.29 A site is considered achievable for development where there is a reasonable prospect that development will take place on the site at a particular point in time⁸. Essentially this is a test of economic viability, which is dependent on two factors: market values and the cost of developing the site; and the capacity of a developer to deliver a scheme that will be attractive to the market. A body of evidence⁹ supports the council's understanding that, subject to allowing for flexibility in the application of local plan policy (e.g. sustainability measures, affordable housing, and infrastructure delivery), and the need for landowners and developers to achieve competitive returns; sites across the borough are able to be developed viably and facilitate growth throughout economic cycles.
- 4.30 In addition to this strategic level viability assessment work, the costs associated with developing a particular site can also impact on achievability. Most costs are to be expected as part of the normal development process but there may be certain circumstances where the possibility of abnormal costs could arise. Where there is reasonable cause to suggest that an abnormal cost may arise, this has been noted and taken into account as part of the achievability considerations. Any site-specific circumstances which may potentially affect market attractiveness are also noted.

⁸ Planning Practice Guidance, Housing and Economic Land Availability Assessments, Paragraph: 021 Reference ID: 3-021-20140306, <http://planningguidance.communities.gov.uk/blog/guidance/>

⁹ VIB/1: Development Economics Study 2010; VIB/2: WH Combined Policy Viability Study 2014; VIB/5: WH Combined Policy Viability Update 2016; VIB/7: WH Strategic Sites Viability Testing 2016.

Delivery timescales

- 4.31 The PPG advises that planning authorities should use information on site suitability, availability and achievability, constraints to assess the timescale within which each site is capable of being developed. They may also take account of lead-in times and build-out rates.
- 4.32 At site promotion stage, promoters were asked to indicate wherever possible, estimated delivery rates and timescales. The information provided is taken into account along with the planning authority's assessment of suitability, availability and achievability, (e.g. if a site is not available until years 6-10 or if infrastructure upgrades are required ahead of development, delivery timescales will be adjusted accordingly).
- 4.33 In addition, since the HELAA 2016, the planning authority has updated its evidence around delivery timescales. In summary, this updated evidence has used a sample of just over 600 planning permissions over the period 2000 to 2015. The analysis examined the length of time sites have taken to complete – from the planning application being received to construction completing.
- 4.34 The analysis indicates that the length of time for an application to be granted was somewhat longer for applications subject to S106 agreements. This has been factored in for sites of 10+ dwellings (which would require a S106 agreement) and is reflected in the later initial delivery for developments of these sizes, as illustrated in the table below.

Table 4: Delivery timescales by size of site

Expected Completions	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
	1-5 years					6-10 years					11-15 years				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
0-4 dwellings															
5-9 dwellings															
10-25 dwellings															
26-100 dwellings															
101-250 dwellings															
251 - 500 dwellings															
500+ dwellings															

- 4.35 The analysis also illustrates that build-out length increases as the size of the development increases, with estimated delivery timescales shown below. (For this purpose of assessing delivery timescales, the year of adoption of the Local Plan has been taken as 2020/21).
- 4.36 Variations to these timescales may occur if a site is policy compliant before the adoption of the plan and progress towards a planning application may have already been made. When making this assessment within the HELAA, and where there is any element of doubt around delivery timescales, a more cautious approach may be taken.

Site references and site scenarios

- 4.37 Please note that in 2019, and to assist in the identification of site to a particular settlement, a number of sites have been assigned new site numbers compared to a previous version of either the HELAA 2016 or a predecessor Strategic Housing Land Availability Assessment (SHLAA). (This was not possible in all cases, however, without re-numbering a large number of other sites, so a minor number of anomalies exist). Sites affected are as follows:
- LHe3 - forms part of a much larger (10.7ha) site, BrP7, which was previously reviewed in the 2016 HELAA. Part (3.3ha) of that BrP7 site is proposed for allocation in the Draft Local Plan 2016. In 2019, an extension of approximately 1.58ha to the proposed site allocation HS24/BrP27 has been promoted. The promoted site extension has been given a site reference of LHe3, as the site is located to the north-west of Little Heath. (Note: In 2016, the HELAA site reference LHe3 was assigned to a site in Swanley Bar - see SB1 below).
 - NS1 - located at Newgate Street. (This site was previously referenced in the HELAA 2016 as BrP15);
 - NS2 - located at Newgate Street. (In 2019, a larger site than one previously referenced in the HELAA 2016 as BrP19, has been promoted);
 - NS3a, NS3b, NS3c - located at Newgate Street. (In 2019, three scenarios involving different site areas have been promoted, all of which are larger than the site previously referenced as BrP20 in the HELAA 2016);
 - SB1, SB1a, SB1b - located at Swanley Bar. (SB1, the larger of the three promoted scenarios in 2019, was previously referenced as LHe3 in the HELAA 2016); and
 - WGC11 - located on the northern edge of Welwyn Garden City. (This site incorporates part of a site referenced as WGC8 in the HELAA 2016).

Site reference anomalies

- BrP17 – a (Brookmans Park) site reference assigned in an earlier version of the HELAA. However, this site is located within the Rural South area (as presented in the 2019 consultation document). Not assigned a new number in 2019; and
- Nor2 – a (Northaw) site reference assigned in earlier versions of the HELAA/SHLAA. Included in the Cuffley section of the 2019 consultation document, being located opposite site Cuf13.

Site reference updates

4.38 Further, since the consultation document on sites promoted through the Call for Sites 2019 was published, a small number of updates have been made:

- StL17 now has a sub-reference of GTLAA10 (to reflect that the site has been promoted for Gypsy and Traveller development, consistent with all other similar sites previously assessed in the HELAA); and
- WGC4 is now referenced as WGC4a (to distinguish the site promoted in 2019 from that part of WGC4 which is already proposed for allocation in the Draft Local Plan 2016).

Site scenarios

4.39 It should also be noted that in 2019, a number of sites were promoted with alternative scenarios (typically, but not always a variation on site size, e.g. sub-parcels of a larger site). Where promoted sites involve different site areas, these are counted as separate sites within the relevant tables reported in this document. The sites where site scenarios/variations were promoted in 2019 were:

- BrP9 and BrP9a (BrP9a is a sub-parcel of BrP9);
- BrP12 and BrP12a (BrP12a is a sub-parcel of BrP12);
- Cuf17, Cuf17a, Cuf17b (Cuf17a and Cuf17b are sub-parcels of Cuf17);
- Nor13 and Nor13a (Nor13 is a sub-parcel of Nor13a);
- NS3a, NS3b, NS3c (NS3c is the larger of three site scenarios, NS3a is the smallest of the three scenarios);
- RS1 and RS1a (RS1a is a sub-parcel of RS1);
- RN3 and RN3a (not counted as separate sites as the alternative scenarios promoted apply to the same site area);
- SB1, SB1a, SB1b (SB1 is the larger of three site scenarios, SB1b is the smallest of the three scenarios);

- WeG3 and WeG3a (WeG3a is a larger scenario than WeG3);
- Wel14, Wel14a, Wel14b (a series of adjoining sites, but not sub-parcels);
- Wel15 and Wel15a (Wel15a is the larger of two separately promoted site scenarios);
- WGC6 and WGC6a (WGC6a is a sub-parcel of WGC6); and
- WGr7 and WGr7a (WGr7a is a sub-parcel of WGr7).

HELAA Results

4.40 In total, 144 potential sites for housing (including mixed-use), employment, Gypsy and Traveller or other forms of development were promoted through the Call for Sites 2019 and have been considered at the relevant stages of this HELAA. The following table sets out the results of the HELAA in the settlement order of the consultation document on the sites promoted through the Call for Sites 2019. Main towns are listed first and then the smaller settlements are listed from north to south across the Borough.

Table 5: Summary of all sites recorded within the HELAA 2019

Settlement	Failed Stage 1	Failed Stage 2	Passed Stage 2	Withdrawn	Total
Welwyn Garden City	1	7	11	1	20
Hatfield	2	6	8	1	17
Potters Bar	0	1	0	0	1
Woolmer Green	0	0	4	0	4
Oaklands & Mardley Heath	0	1	2	0	3
Welwyn	2 ¹⁰	3	6	0	11
Digswell	2	2	0	0	4
Lemsford	0	2	2	0	4
Stanborough	1	0	4	0	5
Rural North	5	0	0	0	5
Essendon	0	1	0	0	1
Welham Green	0	2	8	1	11
Bell Bar / Brookmans Park	0	7	10	0	17
Swanley Bar	1	1	3	0	5
Little Heath	0	0	3	0	3
Newgate Street	2	0	5	0	7
Cuffley	6	2	5	0	13
Northaw	3	1	2	0	6
Rural South	7	0	0	0	7
Total	32	36	73	3	144

¹⁰ One promoted site in Welwyn was not included in the consultation document. With the agreement of the promoter, it fell below the site size and dwelling capacity threshold. It is therefore not mapped in the HELAA.

- 4.41 Of the 144¹¹ sites that were promoted through the Call for Sites 2019, 32 failed at Stage 1 of the assessment process. Three sites were withdrawn, leaving 109 sites, which were assessed or reviewed as part of the Stage HELAA process. Thirty seven sites then failed the Stage 2 HELAA. Seventy two sites passed the Stage 2 HELAA. The HELAA results for all sites can be found in a table at **Appendix 1**.
- 4.42 For sites that passed the Stage 1 HELAA, the Stage 2 site assessments and the review of those sites that were previously assessed in 2016, together with settlement maps, can be found at **Appendix 2**.
- 4.43 Of the 73 sites assessed or reviewed that passed Stage 2 of the HELAA, 24% (17) are located in existing urban areas and (76%) 55 are currently located within the Green Belt.

Table 6: Number of urban and Green Belt sites that passed the Stage 2 HELAA (for housing, employment and primary school)

Settlement	Urban sites that pass Stage 2	Green Belt sites that pass Stage 2	Total
Welwyn Garden City	10	1	11
Hatfield	6	2	8
Potters Bar	0	0	0
Woolmer Green	1	3	4
Oaklands & Mardley Heath	0	2	2
Welwyn	0	6	6
Digswell	0	0	0
Lemsford	0	2	2
Stanborough	0	4	4
Rural North	0	0	0
Essendon	0	0	0
Welham Green	0	8 ¹²	8
Bell Bar / Brookmans Park	0	10	10
Swanley Bar	0	3	3
Little Heath	0	3	3
Newgate Street	0	5	5
Cuffley	0	5	5
Northaw	0	2	2
Rural South	0	0	0
Total	17	56	73

¹¹ The 144 includes the small site at Welwyn noted in footnote 6. (Please note: In addition to the 144 sites, an additional site was promoted late and one small site was not pursued as it fell below the relevant thresholds. A third party suggested a further site but the landowner confirmed this was not available and it was not considered any further).

¹² Includes one site promoted solely for a primary school

Development potential

- 4.44 A breakdown of development potential by settlement and type of site (Urban/Green Belt) from the 73 sites that pass the Stage 2 HELAA is set out in Table 7. These sites have a potential combined maximum development potential of 5,105 dwellings (including up to 5 Gypsy and Traveller pitches on one site). For sites with multiple scenarios, the highest assessed development potential is reflected in the figures below, so as to avoid the potential for double/triple counting (in such circumstances where more than one promoted scenario passed the Stage 2 HELAA). It should be noted that the potential dwelling capacity set out below does not take account of Green Belt considerations. This is taken into account at subsequent stages of the site selection process, together with the conclusions from the HELAA, the Sustainability Appraisal, infrastructure issues and other matters.

Table 7: Dwelling potential from sites which passed the 2019 Stage 2 HELAA

Settlement	Dwelling potential		
	Urban sites	Green Belt sites	Total
Welwyn Garden City	1068	75	1153
Hatfield	295	20	315
Potters Bar	0	0	0
Woolmer Green	34	157	191
Oaklands & Mardley Heath	0	14	14
Welwyn	0	331	331
Digswell	0	0	0
Lemsford	0	41	41
Stanborough	0	499 ¹³	499
Rural North	0	0	0
Essendon	0	0	0
Welham Green	0	500	500
Bell Bar / Brookmans Park	0	934	934
Swanley Bar	0	159	159
Little Heath	0	110	110
Newgate Street	0	85	85
Cuffley	0	763 ¹⁴	763
Northaw	0	10	10
Rural South	0	0	0
Total	1,397	3,698	5,095
%	27%	73%	100%

¹³ Includes one site for up to (4 to) 5 Gypsy and Traveller pitches

¹⁴ Assumes housing only, no primary school

- 4.45 The development potential from urban sites is significantly lower than the potential from promoted Green Belt sites (28% urban/72% Green Belt sites). Further, at a settlement level, the potential for urban capacity is limited to three settlements only: Welwyn Garden City, Hatfield and Woolmer Green.
- 4.46 Other promoted land uses considered in this HELAA were employment (B class uses) and sites promoted solely for primary school provision (to serve household growth in the borough). Table 8 below illustrates that the capacity for such land uses arises in limited parts of the borough only.

Table 8: Development potential for employment (B class uses) and primary school sites which pass the 2019 Stage 2 Assessment

Settlement	Employment fs/ primary school potential		
	Urban sites	Green Belt sites	Total
Welwyn Garden City	1,653m ² (B1a)	0	1,653sqm (B1a) as part of a mixed use scheme
Hatfield	0	B1a/b (61,725m ²) or B1c (32,920m ²), or a mix of B1 class uses, or a mix of B1 and B2	B1a/b (61,725m ²) or B1c (32,920m ²), or a mix of B1 class uses, or a mix of B1 and B2
Potters Bar	0	0	0
Woolmer Green	0 ¹⁵	0	0
Oaklands & Mardley Heath	0	0	0
Welwyn	0	0	0
Digswell	0	0	0
Lemsford	0	0	0
Stanborough	0	0	0
Rural North	0	0	0
Essendon	0	0	0
Welham Green	0	Primary school	Primary school
Bell Bar / Brookmans Park	0	10,623m ² (B1a/b) net	10,623m ² (B1a/b) net as part of a mixed use scheme
Swanley Bar	0	0	0
Little Heath	0	0	0
Newgate Street	0	0	0
Cuffley	0	0	0
Northaw	0	0	0
Rural South	0	0	0

- 4.47 In Welwyn Garden City, potential employment floor space capacity is limited to one urban site (forming part of a promoted mixed-use scheme for housing / employment, within a designated employment area and involving a loss of B2

¹⁵ Promotion for a 'modest' but unspecified level of employment use on one site. The lack of any detail means this was not possible to assess further in the HELAA, but if taken forward, may result in a reduction of the estimated dwelling capacity.

employment and a sui generis use). Green Belt sites around Hatfield and Bell Bar/Brookmans Park present the potential for further employment (B class use) land uses. Recognising the proportionate level of assessment possible at this HELAA stage, employment floor space potential should be viewed as indicative of what may be possible to achieve, depending on the precise nature of a scheme and the balance of uses that may be brought forward at a future point in time. One promoted site around Welham Green presents the opportunity to deliver a 1 or 2 FE primary school on a standalone site.

Delivery timescales

- 4.48 For sites with housing capacity potential that passed the Stage 2 HELAA, an assessment of delivery timescales has been undertaken.

Table 9: Delivery timescales - sites with housing capacity potential that pass the Stage 2 HELAA, by number of sites and settlement (includes multiple site scenarios)

Settlement	Delivery (by number of sites)					Total no. of sites
	1-5yrs	1-5 / 6-10yrs	6-10yrs	6-10 / 11-15yrs	11-15yrs	
Welwyn Garden City	6	1	3	0	1	11
Hatfield	4	3	0	0	0	7
Potters Bar	0	0	0	0	0	0
Woolmer Green	1	3	0	0	0	4
Oaklands & Mardley Heath	2	0	0	0	0	2
Welwyn	0	2	3	1	0	6
Digswell	0	0	0	0	0	0
Lemsford	1	1	0	0	0	2
Stanborough	1	1	1	1	0	4
Rural North	0	0	0	0	0	0
Essendon	0	0	0	0	0	0
Welham Green	7	0	0	0	0	7
Bell Bar / Brookmans Park	6	2	1	1	0	10
Swanley Bar	3	0	0	0	0	3
Little Heath	1	1	1 ¹⁶	0	0	3
Newgate Street	5	0	0	0	0	5
Cuffley	2	3	0	0	0	5
Northaw	2	0	0	0	0	2
Rural South	0	0	0	0	0	0
Total	41	17	9	3	1	71¹⁷

¹⁶ Delivery of this site is assessed as uncertain in the HELAA as it could only come forward in conjunction with another site (delivery in years 1-5). For estimating purposes, this site is noted in years 6-10 in this table.

¹⁷ One site is excluded from this table for Hatfield as it was found suitable for employment uses and not for housing or for a residential-led mixed use scheme. One site is excluded from this table for Welham Green as it was found suitable for a primary school. Hence no dwelling capacity arises from these two sites.

4.49 Where relevant, delivery timescales and delivery rates referenced in site promotions were taken into account. However, account was also taken of the planning authority's updated evidence on delivery timescales alongside other relevant matters such as land availability or the need for infrastructure upgrades, which could result in a delay to delivery. Table 9 indicates that forty sites are considered to be deliverable within the first 5 years following the adoption of the Plan. The delivery estimate for 17 sites straddles years 1-5 and 6-10, with estimated delivery for a further nine sites within years 6-10. Very few sites have a delivery estimate for the latter parts of the plan period. Table 10 illustrates that 38% of potential dwelling capacity arises in years 1-5 of the plan period, with a further 36% straddling years 1-5 or 6-10.

Table 10: Summary of potential housing capacity by delivery timescales¹⁸

Settlement	Potential housing capacity by delivery timescale					Potential capacity
	1-5yrs	1-5 / 6-10yrs	6-10yrs	6-10 / 11-15yrs	11-15yrs	
Welwyn Garden City	526	260	351	0	16	1153
Hatfield	148	167	0	0	0	315
Potters Bar	0	0	0	0	0	0
Woolmer Green	34	157	0	0	0	191
Oaklands & Mardley Heath	14	0	0	0	0	14
Welwyn	0	85	232	14	0	331
Digswell	0	0	0	0	0	0
Lemsford	14	27	0	0	0	41
Stanborough	5 ¹⁹	90	8	396	0	499
Rural North	0	0	0	0	0	0
Essendon	0	0	0	0	0	0
Welham Green	500	0	0	0	0	500
Bell Bar / Brookmans Park	341	269	24	300	0	934
Swanley Bar	159	0	0	0	0	159
Little Heath	51	47	12	0	0	110
Newgate Street	85	0	0	0	0	85
Cuffley	36	727	0	0	0	763
Northaw	10	0	0	0	0	10
Rural South	0	0	0	0	0	0
Total capacity	1,923	1,819	627	710	16	5,095
% (rounded)	38%	36%	12%	14%	0%	100%

¹⁸ Where multiple site scenarios are relevant, the highest estimated capacity has been applied for illustrative purposes, and to avoid the potential for double/triple counting estimated dwelling capacity where more than one scenario passed the Stage 2 HELAA.

¹⁹ This capacity relates to a site considered suitable, available and achievable for up to 5 Gypsy and Traveller pitches

4.50 When looking at the potential dwelling capacity from those sites that passed the 2019 Stage 2 HELAA in the borough's urban areas, Table 11 below illustrates that half of the estimated capacity could be delivered within the first 5 years of the plan period with a further 29% straddling the 1-5/6-10 year delivery estimate period.

Table 11: Potential housing capacity by delivery timescales – Urban Sites

Settlement	Potential housing capacity by delivery timescale – Urban sites					
	1-5yrs	1-5 / 6-10yrs	6-10yrs	6-10 / 11-15yrs	11-15yrs	Potential capacity
Welwyn Garden City	526	390	276	0	16	1078
Hatfield	148	147	0	0	0	295
Potters Bar	0	0	0	0	0	0
Woolmer Green	34	0	0	0	0	34
Oaklands & Mardley Heath	0	0	0	0	0	0
Welwyn	0	0	0	0	0	0
Digswell	0	0	0	0	0	0
Lemsford	0	0	0	0	0	0
Stanborough	0	0	0	0	0	0
Rural North	0	0	0	0	0	0
Essendon	0	0	0	0	0	0
Welham Green	0	0	0	0	0	0
Bell Bar / Brookmans Park	0	0	0	0	0	0
Swanley Bar	0	0	0	0	0	0
Little Heath	0	0	0	0	0	0
Newgate Street	0	0	0	0	0	0
Cuffley	0	0	0	0	0	0
Northaw	0	0	0	0	0	0
Rural South	0	0	0	0	0	0
Total capacity	708	407	276	0	16	1397
% (rounded)	51%	28%	20%	0%	1%	100%

4.51 However, the data in Tables 10 and 11 above illustrates capacity potential, which at this stage is unrefined by subsequent stages of the site selection process. A number of the sites for which capacity is illustrated here may not be taken forward for allocation in the Draft Local Plan, e.g. because of the level of harm that would arise to the Green Belt or for other material reasons. Therefore the data presented here should be treated as indicative in nature and not as a set of any conclusions on site selection or final capacity.

4.52 An up to date trajectory will be produced once conclusions are reached around which of the sites that passed the Stage 2 HELAA should be considered for allocation in the Draft Local Plan.

Promoted capacity increases for sites already proposed for allocation in the Draft Local Plan 2016

- 4.53 As part of the Call for Sites in early 2019 (and in certain cases as part of the consultation event held later in 2019), a number of site promoters have submitted further information promoting higher capacities for sites which are already proposed for allocation in the Draft Local Plan 2016. These sites have been reviewed and the LPA's conclusions can be found (in summary) in Table 12 below and in more detail in **Appendix 3**. An increase in capacity for five sites is considered suitable.

Table 12: Promoted additional capacity for Draft Local Plan 2016 sites

DLP 2016 (HELAA) site ref	Location	Settlement	DLP 2016 capacity	Capacity promoted 2019	LPA concluded capacity 2019	Net change
HS2 (WGC1)	Creswick	Welwyn Garden City	290	320	300	10
SDS2 (WGC5)	South East of Welwyn Garden City	Welwyn Garden City	1,200	1,400	1,300	100
SDS5 (Hat1/13)	Land north west of Hatfield	Hatfield	1,650	1,850	1,750	100
HS11 (Hat11)	Land at Southway	Hatfield	120	140	120	0
HS20 (Wel3)	School Lane	Welwyn	7 (net)	10 to 20 gross (3 to 13 net)	9-12 (net)	2 to 5 (net)
SDS7 (WeG4b)	Land at Marshmoor	Welham Green	80	120	80	0
HS22 (BrP4)	Land west of Brookmans Park	Brookmans Park	250	400-450 plus a 2 FE primary school	300	50
HS27 (Cuf1)	Land north of The Meadway	Cuffley	30	60+	30	0
SDS6 (Hat15)	Symondshyde	Rural North	1,130	1,180 to 1,200	1,130	0
Total net increase in capacity						262 to 265

Updated deliverability information for sites already proposed for allocation in the Draft Local Plan 2016

- 4.54 As part of the Call for Sites in early 2019, a number of site promoters submitted further information around deliverability of sites which are already proposed for allocation in the Draft Local Plan 2016. These sites have been reviewed and the conclusions can be found at **Appendix 4**. The review indicates where the council considers the delivery estimates could be amended.

5. Step 3 – Windfall assessment

5.1 Whilst the HELAA makes every endeavour to identify suitable development sites throughout the plan period, it is inevitable that other sites will come forward unexpectedly. Such sites are referred to as ‘windfall’ and can arise for various reasons, e.g.

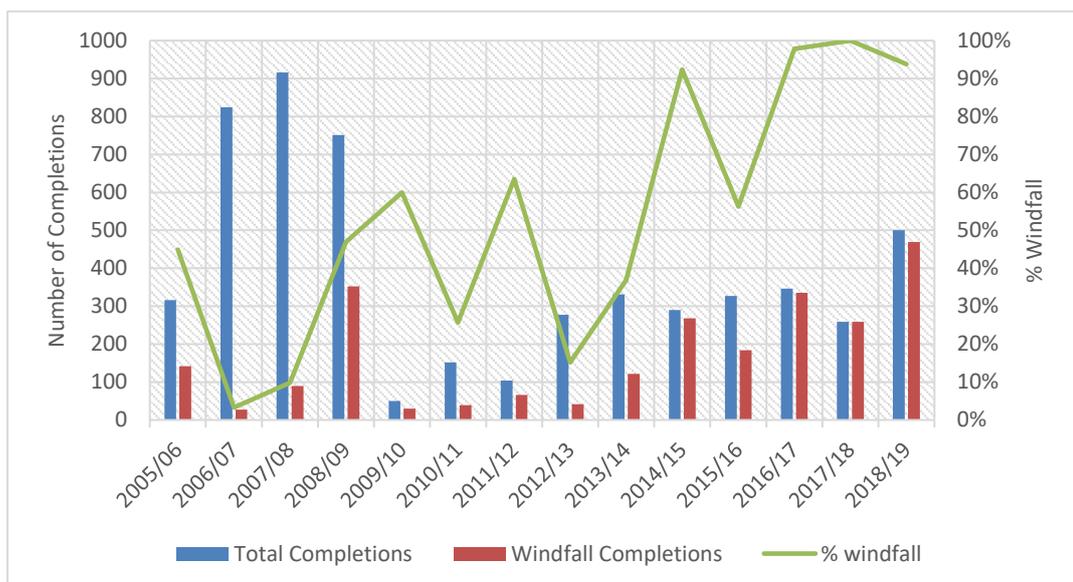
- Landowners may not have been aware of the Local Plan process or known that they could promote their sites as part of it;
- Landowners who knew about the Local Plan process may not have considered it timely, necessary or worthwhile to promote their site;
- Sites may not be allocated, for example because they are too small, but nevertheless could be developed at some point over the plan period;
- Changes in circumstances may result in sites which were never previously considered for development coming forward over time.

5.2 The NPPF allows planning authorities to include windfall sites in their land supplies (including within the 5 year supply²⁰), where there is ‘compelling evidence that such sites will provide a reliable source of supply’²¹. This section establishes what that supply is likely to be.

Updated windfall evidence - dwellings

5.3 Over the 14 years since the District Plan was adopted in 2005, the average proportion of dwelling completions classed as windfall was 44.7%. This varied considerably from year to year, although followed an upward trend as the District Plan became older and allocated sites were completed.

Figure 2: Windfall dwelling completions as a % of total completions

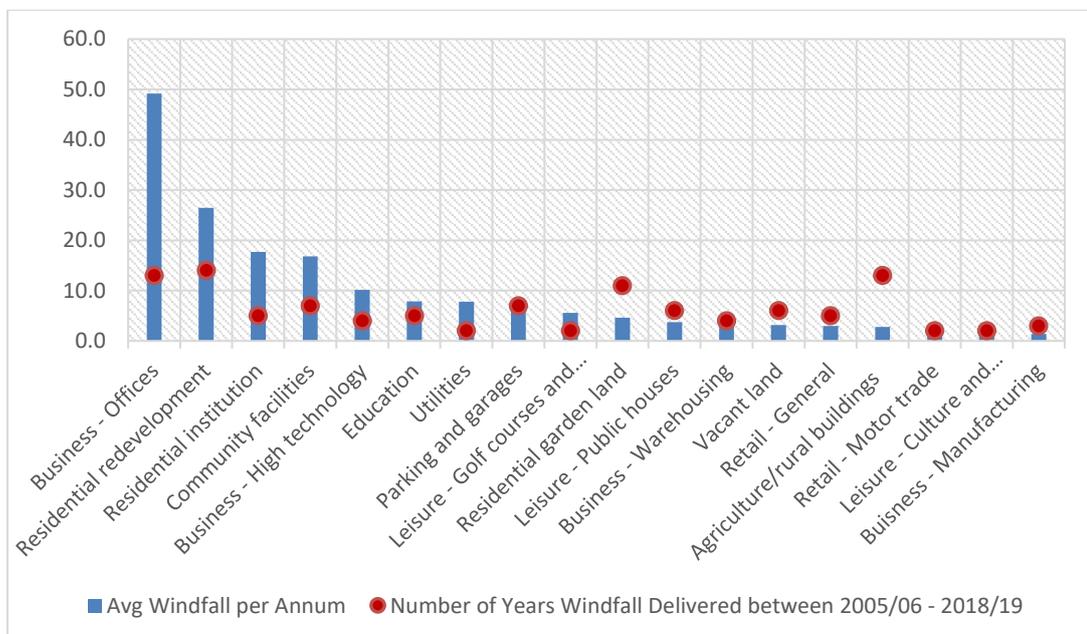


²⁰ Paragraph: 24 Reference ID: 3-24-20140306: PPG 2014

²¹ Paragraph 48 of the NPPF 2012

- 5.4 In the first three years of the District Plan, windfall accounted for just 13% of total completions. In the next five years, this increased to 40%, and 80% in the years since. The last allocated site to come forward was in 2016/17 and, as sites identified in the Draft Local Plan 2016 are not yet being developed, windfall has accounted for almost all completions over the last three years.
- 5.5 On average there were 173 windfall completions each year from a number of previous land uses. The chart on the next page shows the average annual windfall from 2005/06 to 2018/19 by former land use, as well as the number of years which windfall delivered across this 14 year time frame.
- 5.6 Windfall from offices accounts for the largest proportion and this has increased considerably in recent years following the introduction of permitted development rights in 2014. Residential redevelopment also makes up a large share of windfall and is a consistent source of supply delivering in all 14 of the years assessed.
- 5.7 While residential institutions also delivered a reasonable supply of sites, delivery was from a small number of large sites and not as regular.
- 5.8 Other consistent sources of supply - although delivering somewhat lower numbers of completions - were agriculture/rural buildings and residential garden land. However, as the National Planning Policy Framework states: *“plans should consider the case for setting out policies to resist inappropriate development of residential gardens”*²² this source of supply has not been included in the windfall allowance.

Figure 3: Average windfall per year by former land use (2005/6-2018/19)



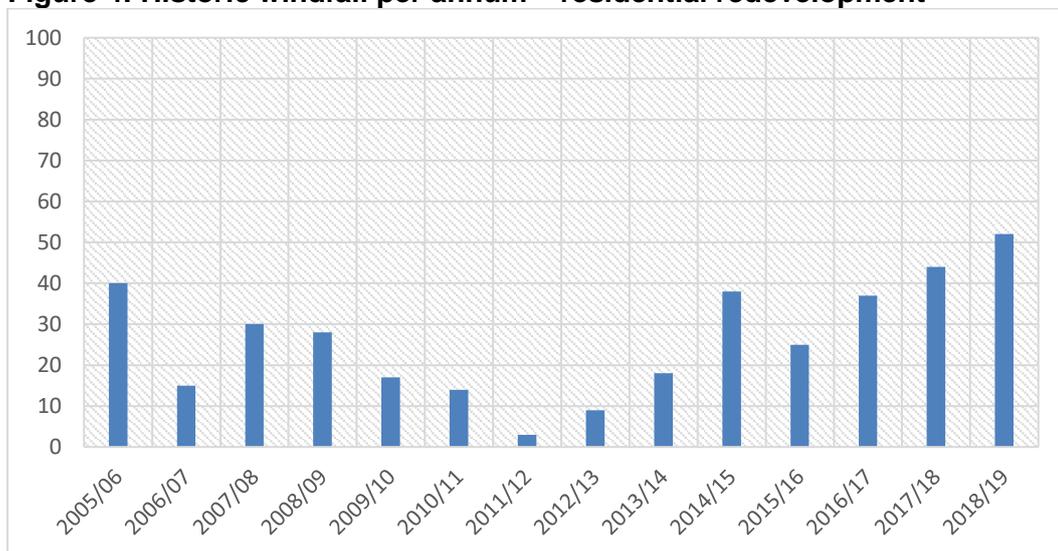
²² Paragraph 70, July 2018, National Planning Policy Framework

Sources of Future Windfall Supply

Residential redevelopment

- 5.9 Residential redevelopment provides the most consistent supply of windfall sites, contributing a large number of small completions every year. While windfall from other former land uses was lower following the adoption of the development plan and then increased as the plan became older, windfall from residential redevelopment remains reasonably consistent. As the NPPF considers previously developed sites as acceptable development in the Green Belt, this has resulted in additional windfall from this settlement type as well as towns and villages. Windfall from this land use is expected to continue at the historic rate of 26 dwellings per annum across the plan period.

Figure 4: Historic windfall per annum – residential redevelopment



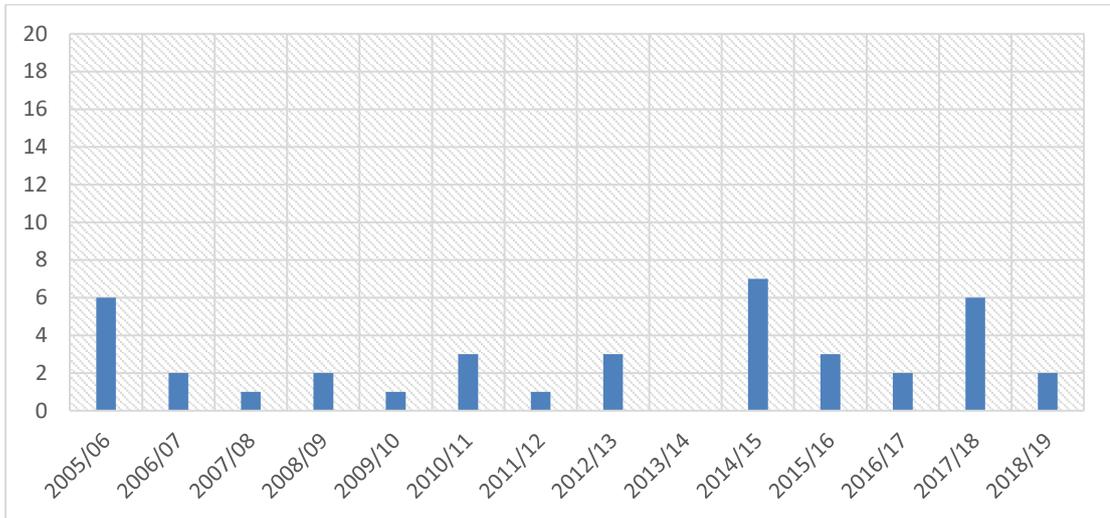
Agriculture and Rural Buildings

- 5.10 Land from agriculture and rural buildings has provided a consistent source of windfall historically, with completions from this use across 13 of the last 14 years. The average level of windfall has been relatively low at 2.8 dwellings per annum.
- 5.11 Permitted development rights, introduced in April 2014, mean that planning permission is not required to convert agricultural buildings to dwellings. In addition, the NPPF classes previously developed land as acceptable development in the Green Belt in certain cases, such as where it will not cause substantial harm to the openness of the Green Belt²³. Both of these factors have given rise to further opportunity for this type of development. The average level of windfall from the time permitted development rights were introduced in 2014 is 4 dwellings per annum. As this is expected to continue,

²³ Paragraph 145, July 2018, National Planning Policy Framework

future windfall is projected in line with this - 4 dwellings per annum across the plan period.

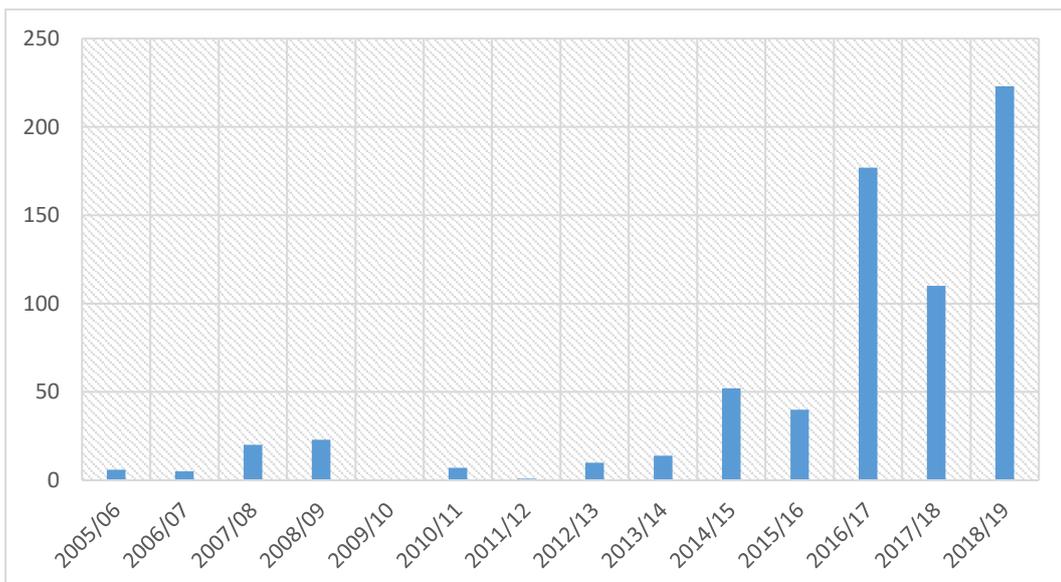
Figure 5: Historic windfall per annum – agricultural and rural buildings



Business - Offices

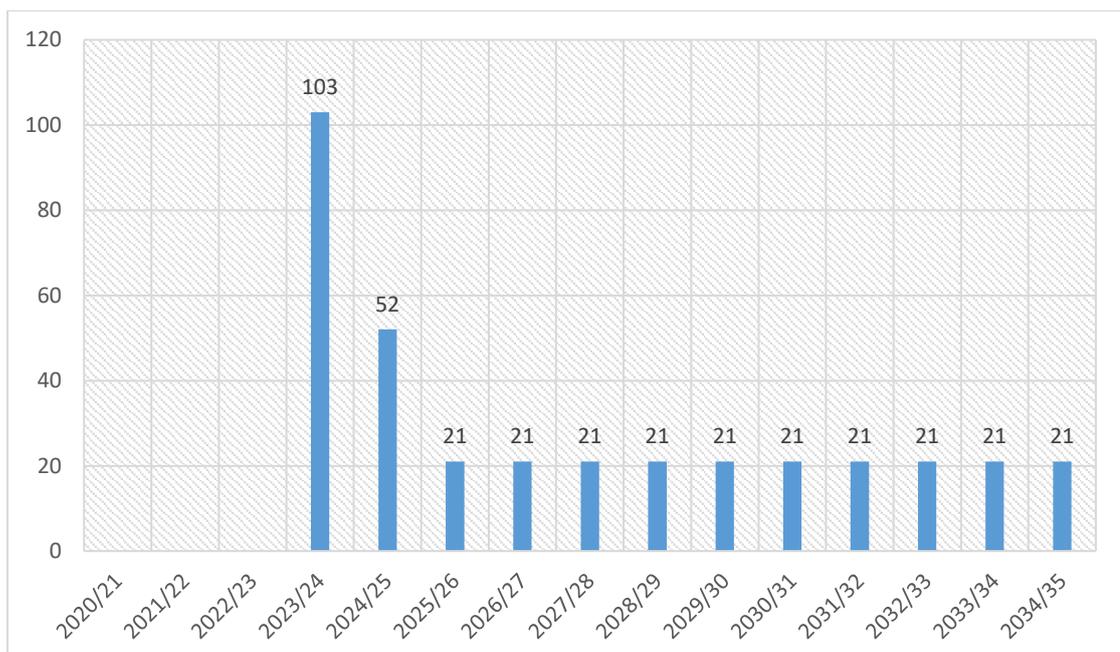
5.12 Permitted development rights, allowing the conversion of offices to dwellings without the need for planning permission, were temporarily introduced in 2013 and made permanent in 2016. This has resulted in large increases in windfall from this use in recent years – the average level of windfall before this introduction was 9 dwellings per annum, in the years since this has increased to an average of 103.7 dwellings per annum.

Figure 6: Historic windfall from business – offices



- 5.13 An Article 4 Direction is currently being proposed to remove these permitted development rights in four of the key employment areas in the borough. This would mean that planning permission would again be required for change of use from B1 office to C3 residential. The Article 4 direction would not come into effect until 12 months after it is adopted – therefore, if approved, it has been assumed that the Direction would take effect from October 2020.
- 5.14 It would be expected that this would have a significant impact on windfall from office use, with permitted development applications remaining high or even increasing in the months leading up to the implementation of the Article 4 Direction. As applications are usually valid for three years, and usually take between 2-3 years to complete, a higher level of windfall would be expected early on as these applications progress to completion.
- 5.15 No windfall allowance is made for the first three years of the plan period as the majority of homes completed in this time are likely to already be known about and already factored into the supply. In 2023/24 supply from former office use has been forecast at 103 dwellings (in line with the historic annual rate seen since the introduction of permitted development rights). This is then expected to drop off in the following year as the last of these sites complete – therefore windfall supply for 2024/25 is estimated at half the historic rate of 52 dwellings.
- 5.16 Looking at the level of windfall from planning applications only since 2013/14 (i.e. excluding prior notifications), supply from former office use has averaged 21 dwellings per annum. This is also in line with the higher levels seen in the years before permitted development rights were introduced. Windfall from 2025/26 to the end of the plan period has been forecast in line with this.

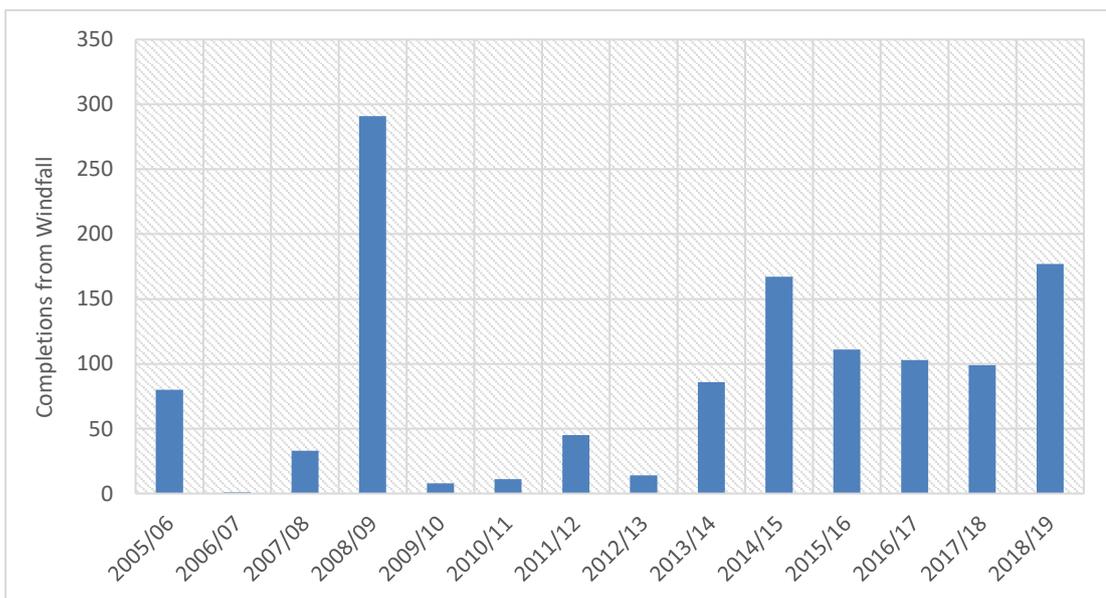
Figure 7: Forecast windfall from offices



Other Sources of Windfall and Windfall Phasing

- 5.17 The three sources detailed above (residential redevelopment, agriculture and rural buildings, and offices) have been a consistent source of supply and have therefore been included across the entire plan period – with the exception of the first three years. As explained, no windfall allowance is made for this period as the majority of homes completed in this time are likely to already be known about.
- 5.18 There are a number of other former land uses²⁴ which have contributed to windfall in the past. As supply from these sources has not been as constant, this makes windfall from these uses more difficult to forecast.
- 5.19 Figure 2 showed that the level of windfall is likely to be higher towards the end of the plan period as allocated sites are completed. Looking at historical delivery from these other uses, this increased in the years following the end of the District Plan. In 2008/09 three large developments were completed and not allocated which resulted in a spike in windfall for this year. For these other land uses, the annual average of 88 dwellings per year has been forecast in the last five years of the plan period.

Figure 8: Other sources of windfall



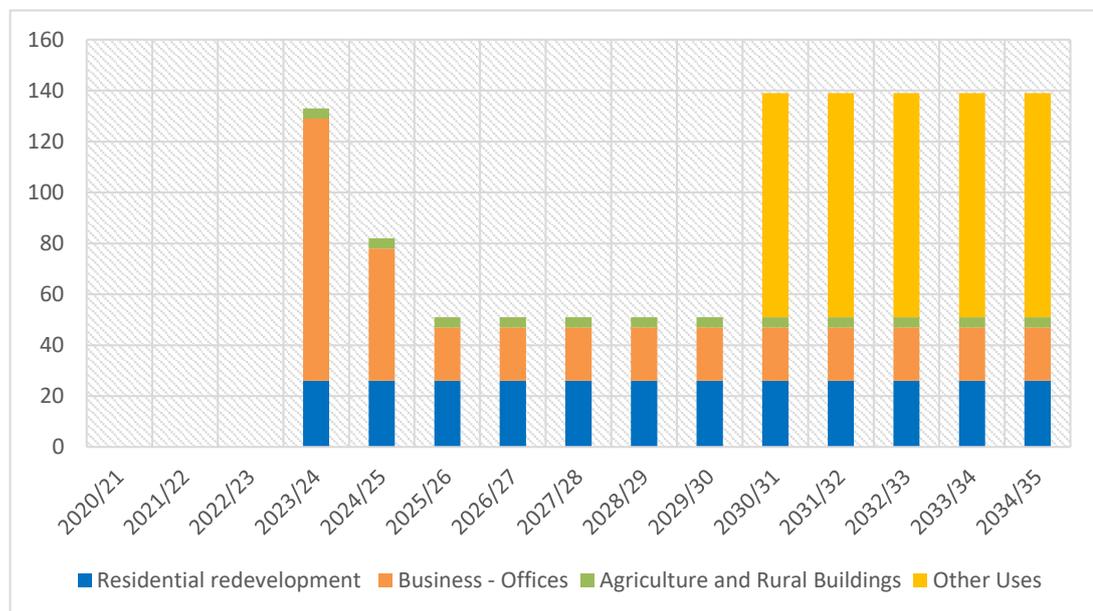
- 5.20 Figure 9 summarises the total allowance made for windfall across the plan period. There will be no windfall allowance in the first three years of the plan period (adoption is assumed to be in 2020/21). From 2023/24 windfall allowance has been made for former land uses which have showed consistent

²⁴ Including: community facilities, retail, business uses – excluding offices, education, residential institutions, utilities, leisure, parking and garages, public houses, warehousing and distribution, and motor trade.

windfall supply - residential redevelopment, offices and agricultural/rural buildings.

- 5.21 As the HELAA is only able to assess (and the local plan only able to allocate) sites which have been promoted at a specific point in time, it is likely that towards the end of the plan period the rate at which windfall arises will be higher. In the last 5 years of the plan period (from 2030/31), an additional supply is expected and has been forecasted in line with that seen historically. Total projected windfall for the 12 year period 2023/24 to 2034/35 would equate to **1,165 dwellings**. (If the plan period were extended to 2035/36, total projected windfall would increase to **1,304 dwellings across a 13 year period**).

Figure 9: Plan period total forecast windfall



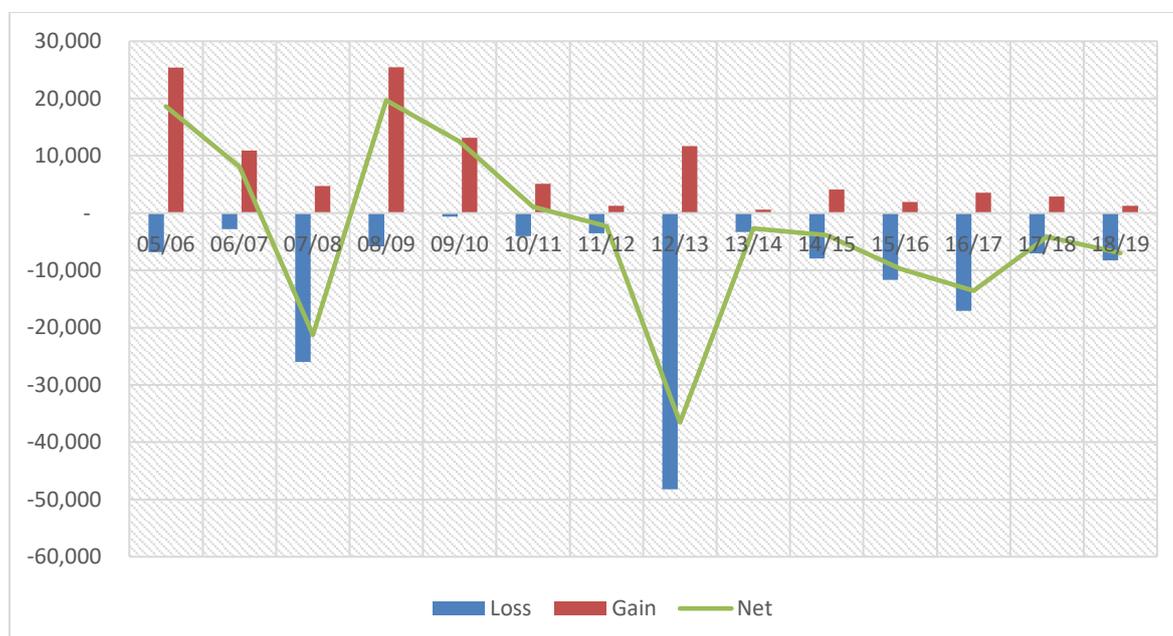
Windfall - Employment Land

- 5.22 The 2005 adopted District Plan identifies a number of designated employment areas within the borough. The former Hatfield Aerodrome site was identified as the largest planned opportunity to provide the majority of new floor space supply over the District Plan period.
- 5.23 For the purposes of this assessment, the windfall definition has been applied to employment related floor space gains and losses that were not specifically planned for within the adopted District Plan, even where these changes occurred within designated employment areas. For example, in terms of employment losses, some employment land was identified for residential development in the District Plan - the Broadwater Road West site, Mount Pleasant Depot, Knella Road Workshops, Former Dairy Depot. As these sites

were specifically identified for development in the adopted plan, related losses have not been counted as windfall.

- 5.24 Across the period 2005/06 to 2018/19, 69% of losses of employment land were windfall while 76% of gains in employment land were windfall.
- 5.25 The general trend in employment windfall trend has shown a net loss of employment floor space. On average, the **net annual change in windfall employment floor space was -2,900 m²**. While in earlier years there were some net gains in employment floor space, the net trend has been negative since 2011/12. The large loss in 2012/13 was a result of the residential redevelopment of the GSK research facility at the Frythe.

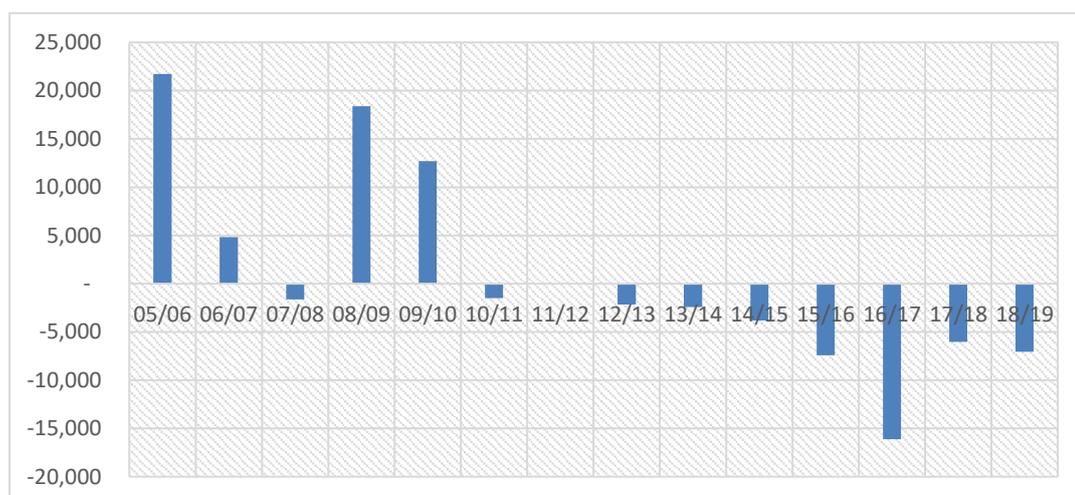
Figure 10: Employment floor space changes all B class uses (windfall only)



Changes in B1a (Office) floor space

- 5.26 Historically, there were some significant gains in B1a office floor space from windfall. These were mainly a result of redevelopments, although change of use from other business uses including storage and distribution (B8) and research and development (B1b) also accounted for a large proportion of gains. However, since the introduction of permitted development rights in 2013, the trend has been a net loss of office floor space with the vast majority of this being lost to residential use. Any small windfall gains have been offset by large losses of B1a floor space.

Figure 11: Net change in B1a floor space (windfall only)



- 5.27 The projected residential windfall allowance arising from former office use (as outlined in paragraph 5.12) has also been reflected in terms of loss of the borough's employment land supply. Office-to-residential developments within the borough have typically comprised of 1-bed and 2-bed flats. The space requirement outlined in the Nationally Described Space Standards for new homes of this size is between 39m² and 70m².
- 5.28 However, office-to-residential conversions are not required to comply with these standards. Looking at a sample of office-to-residential conversions granted via permitted development rights, the median dwelling size was 60m² (calculated using the gross internal area and the number of dwellings proposed). Applying this figure to the projected windfall of 365 dwellings across the 12 year period (2023/24-2034/35) the **projected loss of office floor space is expected to be around 21,900m²**. (If the plan period were extended to 2035/36, the **projected loss** of office floor space **would increase to 23,160m²**).

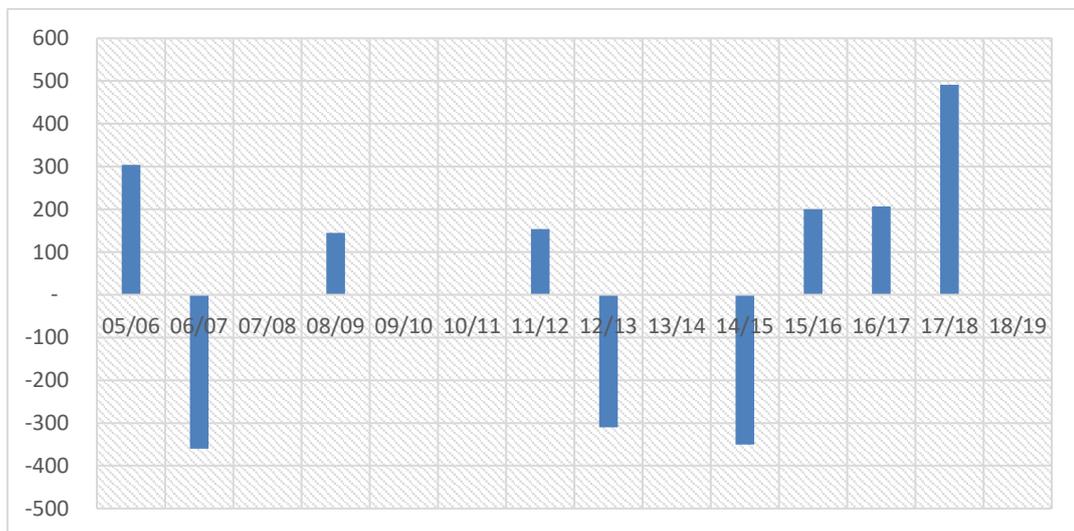
Changes in B1b (Research & Development) floor space

- 5.29 Changes in B1b floor space in Welwyn Hatfield have been much less frequent. As previously mentioned the large loss of B1b floor space in 2012/13 was a result of the residential redevelopment of the GSK research facility at the Frythe. This loss was not identified in the District Plan and therefore has been classed as windfall. There were two windfall gains in B1b floor space as a result of extensions/alterations to existing facilities in earlier years, however, due to the inconsistent and one-off nature of B1b floor space changes, it has not been considered realistic to forecast future changes based on the historic rate.

Changes in B1c (Industrial) floor space

5.30 The annual average net change in B1c floor space in the 14 years since 2005/06 was +34m², with gains balancing out any losses. Figure 12 shows variations between years with net losses recorded in three years and net gains recorded in six years. The changes in B1c floor space were generally quite low with the highest net gain recorded in 2017/18 at +490m² and the highest net loss of -360m² in 2006/07. Land lost was largely to residential use, whilst gains in B1c were the result of a mixture of redevelopments and extensions, as well as from former storage and distribution and agriculture & rural building uses. No windfall forecast has been made for B1c employment use as historically gains have balanced out any losses.

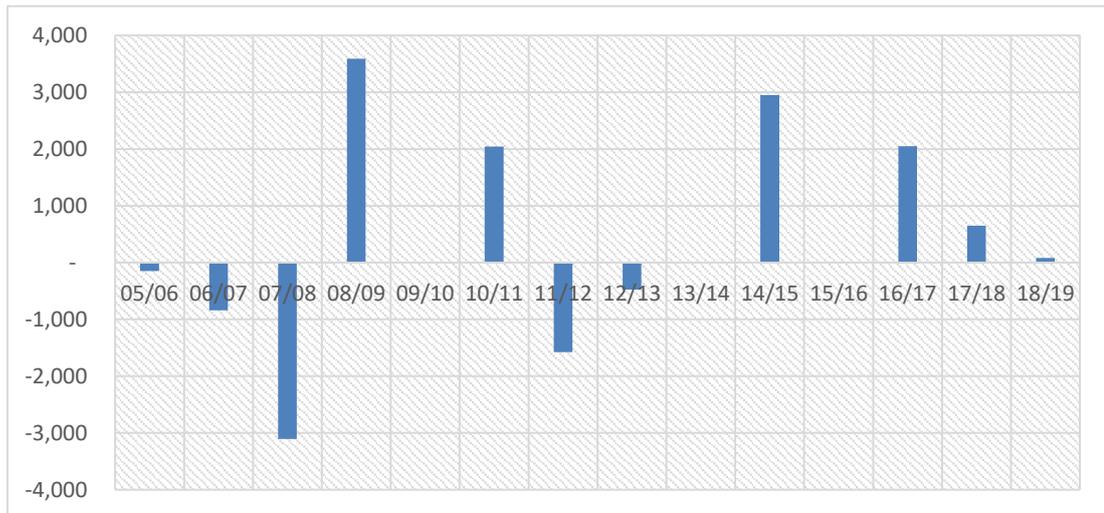
Figure 12: Net change in B1c floor space (windfall only)



Changes in B2 (General Industry) floor space

5.31 The net annual average employment windfall from B2 general industry across the time frame 2013/14 – 2018/19 was +373m². Gains and losses were largely from changes between business uses, specifically storage and distribution B8 use class as well as from sui generis uses. Whilst changes in floor space were reasonably consistent (being recorded in 11 of the 14 years) there was not a steady pattern to the changes in B2 floor space, with the annual average gain being reasonably minimal. Consequently no future windfall has been forecast.

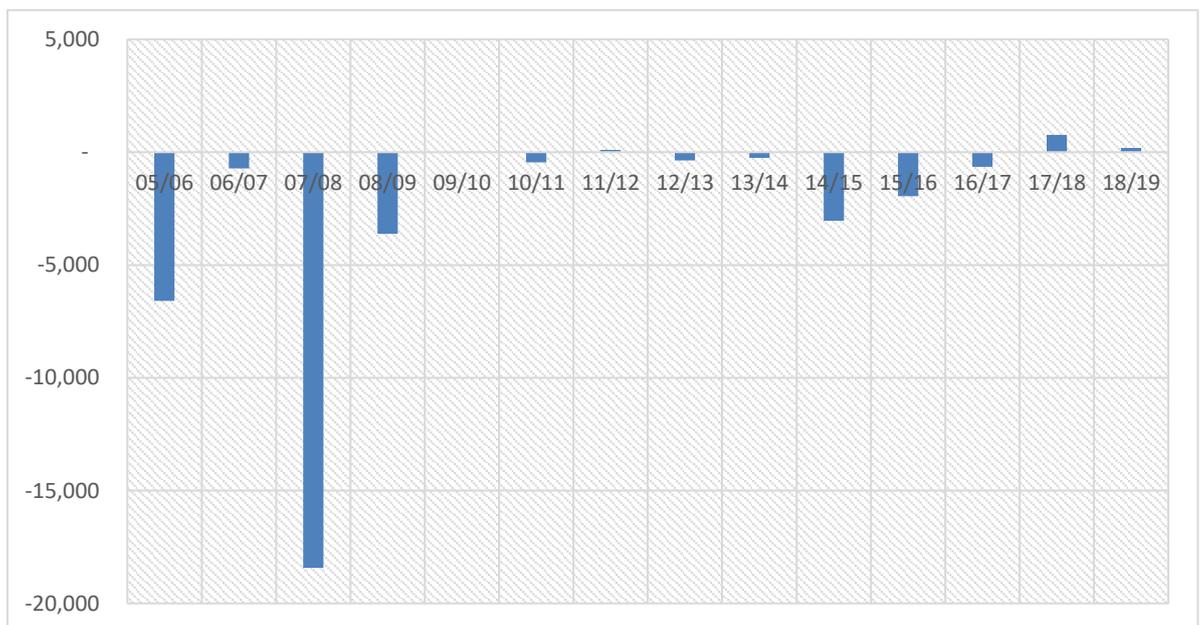
Figure 13: Net Change in B2 Floor Space (Windfall Only)



Changes in B8 (Storage and Distribution) floor space

5.32 Historically, the trend has been a net loss of B8 floor space with the annual average loss at -2,501m². However, this figure was driven down somewhat by a significant loss at a single site in 2007/08 (a change of use from storage and distribution to B1a offices). When this loss is excluded the average annual net change is -1,183 m². Losses of B8 have generally been to other business classes – B1a and B2, however, there have also been some noteworthy losses to residential uses. In terms of gains, these were largely from redevelopments or extensions to existing sites, though changes from other business classes also contributed to some gain. Whilst the general trend has been for a loss in B8 use, changes between use classes haven't been consistent and were generally the result of one-off developments.

Figure 14: Net change in B8 floor space (windfall only)



6. Step 4 – Assessment Review

- 6.1 The methodology flowchart in the Planning Practice Guidance describes Step 4 as the assessment review, i.e. a review of the conclusions of the HELAA process in the context of the need for housing and economic development uses; to consider whether sufficient sites can be identified to meet identified development needs (with a draft trajectory).
- 6.2 The HELAA illustrates that capacity exists on suitable, available and achievable sites for around 5,095 dwellings (including up to 5 Gypsy and Traveller pitches). Whilst in principle this indicates a level of potential capacity sufficient to address the shortfall between the housing target in the submitted Draft Local Plan 2016 and the assessed need for housing, it is notable that 73% of this capacity applies to sites that are currently within the Green Belt. The potential capacity on urban sites would not be sufficient to address the shortfall (even if all such sites were subsequently selected for allocation in the Plan, which may not be the case).
- 6.3 One site has been found suitable, available and achievable for a standalone primary school site (around Welham Green). A limited number of sites have the potential to deliver employment-related (B class use) e.g. as part of a mixed-use development.
- 6.4 However, decisions on which sites will be taken forward as proposed site allocations will be informed by subsequent stages of the site selection process.

7. Step 5 – Final evidence

- 7.1 The methodology flowchart in the Planning Practice Guidance, describes Step 5 as the final evidence base, with outputs informing the planning authority's position of the deliverability (a 5 year supply) and developability of sites, which informs development plan preparation. Should a stepped trajectory be necessary, then this needs to ensure that planned housing requirements are fully met within the plan period. As the HELAA is a high-level assessment of potential capacity and does not determine which sites should be allocated in the Local Plan, an up to date trajectory (for plan-making purposes) will be produced once the site selection process has concluded and decisions have been made on which sites to take forward. Further consideration will also be given to the continuing need for a stepped housing delivery target (as currently set out in the Draft Local Plan 2016), with reference to the NPPF definitions of *deliverable* and *developable* sites and the Council's evidence base on this, as described in earlier sections of his HELAA document.

8. Conclusion

- 8.1 This HELAA 2019 has considered over 140 sites promoted to the Council through the Call for Site 2019 and an assessment has been made of potential development capacity arising from sites that passed a Stage 2 assessment.
- 8.2 A further, more detailed, appraisal of sites will be carried out in a Housing and Employment Sites Selection background paper (a topic paper), as part of the site selection process. This paper will take account of matters such as the level of harm that would arise to the Green Belt, the opportunity to define amended Green Belt boundaries, the Sustainability Appraisal and any infrastructure constraints or opportunities.
- 8.3 This document supplements the HELAA 2016 and may, therefore, need to be read in conjunction with this earlier document. Any matters highlighted in the HELAA in relation to any particular site does not constitute formal planning advice but may be taken into account at future stages in the planning process.
- 8.5 For ease of reference, consideration has also been given within this document to promoted increases in capacity and updated delivery information for a number of sites that are already proposed for allocation in the Draft Local Plan 2016. The planning authority concludes that a limited amount of additional capacity is considered appropriate for these sites.