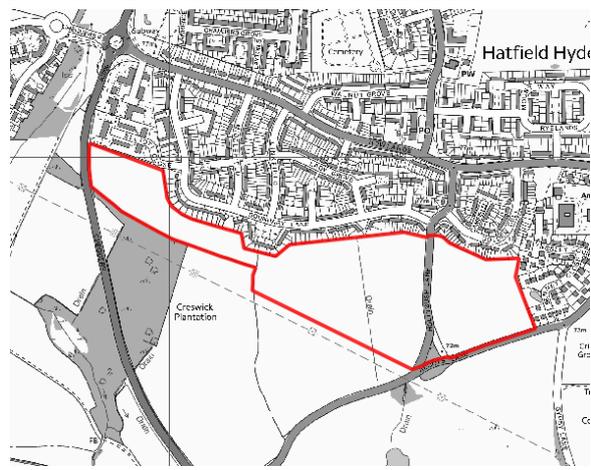


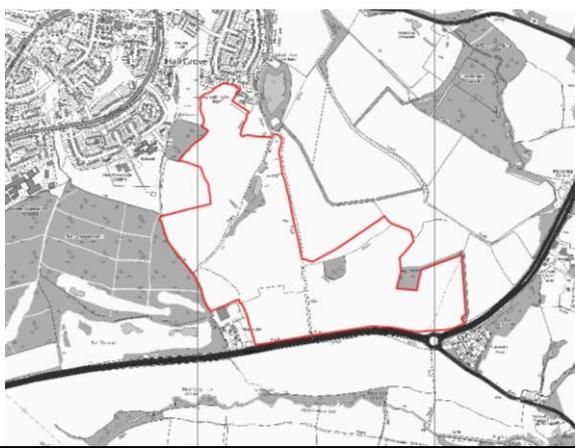
**Review of higher capacities promoted for sites already proposed for allocation
in the Draft Local Plan 2016**

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 this appendix.

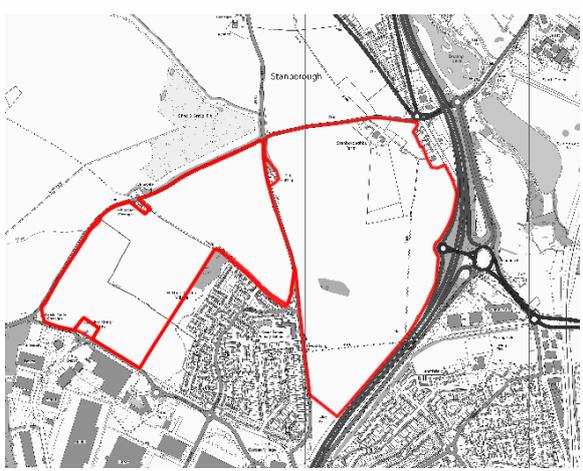
Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference		Site Address or Location		Town or Settlement	
	HS2 (WGC1)		Creswick		Welwyn Garden City	
	Urban / Green Belt		Capacity in Draft Local Plan 2016		Promoted capacity 2019	
	Green Belt		290 (300 agreed at hearing session)		320	
2019 Update	<p>This site was discussed at the Stage 4 Hearing session (June 2018). The estimated dwelling capacity in the DLP 2016 of 290 dwellings represents a relatively low density of 20dph(g)/32dph(n), but this reflects a number of constraints including the need to plan for a buffer to the adjacent Wildlife Site and clearance to HV overhead powerlines.</p> <p>A modification was proposed (and discussed) at the Hearing session to increase the capacity of site HS2 (WGC1) to 300 dwellings, agreeing with the promoter's 2016 representation, increasing the density slightly to 21 dph (g)/34dph (net). This is considered appropriate to a site that (once removed from the Green Belt) will be on the edge of the extended urban area with a direct interface with the Green Belt. This will provide for flexibility in layout, whilst responding sensitively to the wider landscape and any acknowledged constraints.</p> <p>No evidence has been submitted which currently persuades the Council at this plan making stage that an increase to the previously discussed modification of 300 dwellings would be appropriate.</p>					
Suitable	Yes	Available	Yes	Achievable	Yes	
Conclusion	<p>300 dwellings (a net increase in 10 dwellings as discussed at the Stage 4 Hearing session) is considered appropriate.</p>					

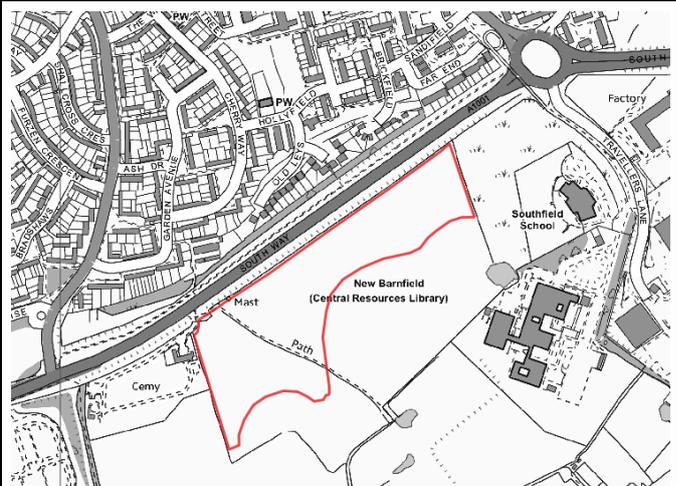
Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference	Site Address or Location	Town or Settlement		
	SDS2 (WGC5)	South east of Welwyn Garden City	Welwyn Garden City		
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019		
	Green Belt	1,200	1,400		
2019 Update	The site has an estimated dwelling capacity of 1,200 dwellings in the DLP 2016. Delivery is estimated across years 1–15, given the scale of development, the need for master planning and upgrading of waste water infrastructure. The capacity of the site takes account of the need to avoid Flood Zones 2 and 3, mitigate ecological (the proximity of The Commons Local Nature Reserve and Wildlife Sites) and heritage impacts (on the significance of various designated heritage assets in the area) and noise and air pollution arising from adjoining roads and land uses. The proposed mixed use housing led allocation (Policy SP19), together with land allocated in the adopted East Herts Local Plan forms the proposed Birchall Garden Suburb (BGS), an urban extension to the south east of Welwyn Garden City. The promoter has suggested that the capacity of WGC5 should be higher at 1,400 dwellings on the basis that, at an average net density of 30dph, this is below the 35dph assumed for that part of BGS within East Herts District and, as the two parts of BGS contain a similar balance between urban edge and semi-rural elements, it would be appropriate for the average net densities to be similar. The promoter has not, however, submitted any evidence to demonstrate how a higher capacity on site WGC5 could be accommodated, given the identified environmental impacts and the need for significant mitigation measures to address these. However, work commissioned by the Council to inform a future Supplementary Planning Document for this site, indicates that it would be possible to achieve a slightly higher density around the new neighbourhood centre located on the southern part of the site. As a result, the Council acknowledges that it may be possible to deliver an additional 100 dwellings at WGC5.				
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	An increase in capacity of 100 above the DLP 2016 estimated capacity is considered achievable taking the capacity of WGC5 to 1,300 dwellings				

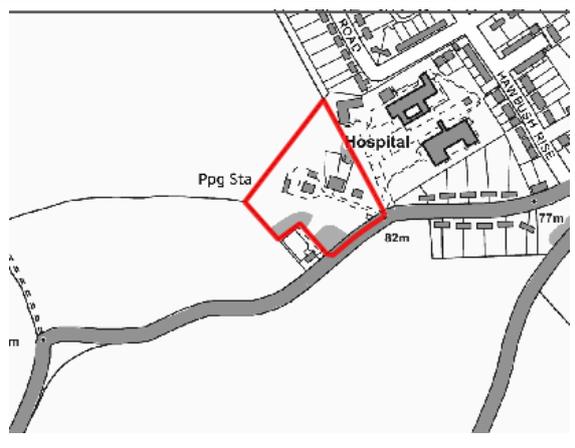
Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference	Site Address or Location	Town or Settlement		
	SDS5 (Hat1 and 13)	Land north west of Hatfield	Hatfield		
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019		
	Green Belt	1,650	1,850 dwellings		
2019 Update	<p>This site was discussed at the Stage 4 hearings in June 2018. It has an estimated capacity of 1,650 dwellings in the DLP 2016. Delivery is estimated across years 0-15 given the scale of development, the need for master planning, the need to extract minerals from the majority of the site before commencement, and the need for upgrading of waste water infrastructure to serve later phases. The capacity of the site takes account of the need to mitigate heritage impacts (on the setting of the listed building Old Cottage and on the historic park of the Brocket Estate) and noise and air pollution arising from adjoining roads, including the A1(M). The site is also required to accommodate a secondary school of up to 10FE, new and extended primary schools, a neighbourhood centre, employment area, community facilities, sustainable drainage features and substantial green space for both formal and informal recreation. The landowner is now promoting a capacity increase of 200 dwellings on this site, taking the total to 1,850. In terms of density, and with a net developable area for housing estimated at 61ha, the current 1,650 allocation is at a density of 12.8dph (g) / 27dph (n). Because of the large size of the site the Council considers that there may be the flexibility to allow some higher density development in those central parts of the site which adjoin facilities or transport nodes, to counter-balance lower densities at the new urban edge adjoining countryside. This will need to be explored in further detail as part of the masterplanning work to ensure that any increase in dwelling numbers does not compromise the amount of land available for the necessary on-site infrastructure which is noted above. Account will also need to be taken of the results of the most recent relevant transport modelling work, and to any additional traffic demand on Coopers Green Lane, Hatfield Avenue and the nearby A1(M) junction 4 not giving rise to severe impacts. However, at this stage, it is considered that the opportunity exists to increase capacity by an additional 100 dwellings, resulting in a net density of 29dph.</p>				
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	<p>An increase in capacity of 100 above the DLP 2016 estimated capacity is considered achievable taking the capacity of Hat1 to 1,750 dwellings</p>				

Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference	Site Address or Location	Town or Settlement		
	HS11 (Hat11)	Land at South Way (A1001)	Hatfield		
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019		
	Green Belt	120 dwellings	140 dwellings plus primary school		
2019 Update	This site is due to be discussed at the village site examination sessions in 2020, due to its position in the Green Belt gap between Hatfield and Welham Green. The site was included in the 2016 DLP following a decision of members at Cabinet Housing and Planning Panel in June 2016 to accord significant weight to the opportunity for bringing forward land in the same private ownership as an extension to the existing Lawn Cemetery. Since its inclusion in the DLP, discussions with HCC as education authority concerning future provision of primary education capacity for southern Hatfield have identified that the site could also accommodate a new 2FE primary school, partly to serve Local Plan housing growth and partly to remedy other shortfalls in school places. Whilst the originally promoted 120 dwellings could reasonably still be accommodated in addition to the school (whose playing fields would be outside the HS11 allocation, within the remaining Green Belt), it is not considered that sufficient evidence exists at present to justify an increase in proposed dwelling capacity.				
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	At present the estimated capacity of this site should remain at the 2016 DLP figure of 120 dwellings (in addition to a new 2 FE primary school as noted above).				

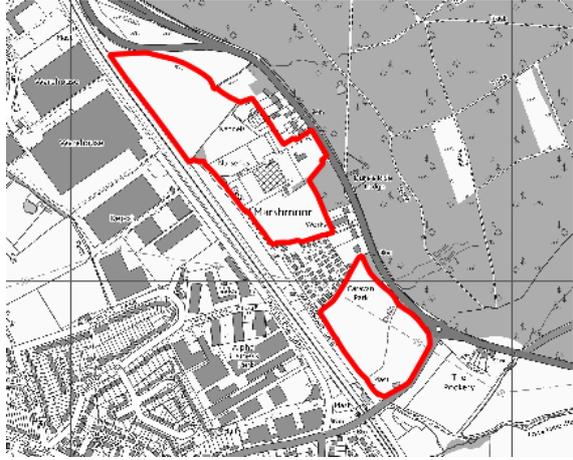
Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference	Site Address or Location	Town or Settlement
	HS20 (Wel3)	School Lane	Welwyn
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019
	Green Belt	7 dwellings (net)	10 to 20 dwellings
2019 Update	<p>The site adjoins Welwyn village and contains three existing dwellings in addition to a pumping station. A large electricity sub-station adjoins the site's south-western boundary. The estimated site capacity of 7 dwellings (10 gross) in the DLP 2016 reflected the promoter's intention at that time to retain the existing pumping station, to allow for the retention of trees and respond to the Highway Authority's view that a limited amount of development would be appropriate given the highways constraints of School Lane and in the interests of the users of the wider highway network. Whilst all of the site lies within Flood Zone 1 (lowest risk of fluvial flood risk), in the HELAA 2016, it was noted that a surface water flow route runs east-west through the site. Surface water flood risk affects 7% of the site (1:30yr), 12% (1:100yr), and 31% (1,000yr). This risk will need to be considered as part of a site specific Flood Risk Assessment (FRA) and this may affect the design and layout of a detailed scheme at planning application stage.</p> <p>In 2019, the site has been promoted for an increased capacity of between 10 and 20 dwellings with (or possibly without) the removal of the pumping station. Neither Whitehill or Ayot St Peters Road, which are rural roads, are suitable to accommodate any increase in traffic, meaning that School Lane would serve as the main route for access and egress to the wider highway network. School Lane has a capacity issue with a pinch point that cannot be widened (listed building constraint). The acceptability of any further development which utilises School Lane for access needs to be demonstrated through an appropriate assessment to include consideration of the impact of development on the High Street/School Lane junction. For transport modelling purposes an assessment (associated with another promoted site) has previously considered the effect of 95 additional dwellings – this was considered to present no absolute constraint in highway terms. Nearby promoted site Wel16 has been found suitable for 65 dwellings and on this basis, a small uplift to capacity at Wel3 could be accommodated within the scope of existing modelled outputs.</p>		

Review of higher capacities promoted for sites already proposed for allocation
in the Draft Local Plan 2016

HS20 (Wel3)		School Lane			
	The estimated net developable area takes account of the possible removal/retention of the existing pumping station and the need to retain the existing trees on site, which provide bordering features and a beneficial screen around the electricity sub-station to the south-west and help to mitigate the impact of development in the wider landscape. Assuming retention of pumping station (net developable area: 0.6ha) at 20dph = 12 dwellings gross/9 dwellings net. Assuming removal of pumping station (net developable Area: 0.74ha) at 20dph = 15 dwellings gross/12 dwellings net.				
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	Opportunity for a small net increase of 2 to 5 dwellings over and above DLP 2016 proposed allocation				

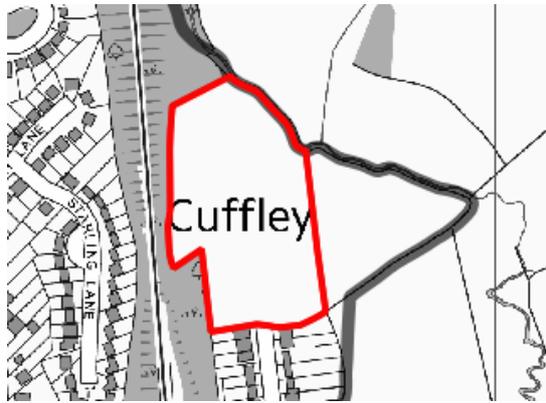
Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference	Site Address or Location	Town or Settlement		
	SDS7 (WeG4b)	Land at Marshmoor	Welham Green		
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019		
	Green Belt	80 dwellings (as part of a mixed use policy area)	120 dwellings (as part of a mixed use policy area)		
2019 Update	<p>The estimated site capacity of 80 dwellings reflected concerns raised by Historic England at previous consultation stages that development of the site could potentially have an impact on Hatfield House (Grade I Registered Park and Garden) on the opposite side of the A1000, and noting that the land in its largely undeveloped current state acts as a barrier between the registered park and garden and the existing built up area of Welham Green. It was considered that an appropriate landscape-led development could mitigate these issues, and that any proposals should retain existing trees, hedgerows or other natural landmarks, or compensate for them in the event that any could not be retained. Whilst the site promoters responded to the concerns raised as part of the Regulation 19 Consultation, no additional information has been provided for this submission to explain why a higher number of residential units would be appropriate, but notes that “any outstanding issues would be capable of resolution via the production of the Supplementary Planning Document envisaged by the Borough Council and the planning application process”.</p> <p>At this stage, no increase in dwellings above the 80 previously assessed, though more detailed assessment of some of the identified issues through a Supplementary Planning Document or through the planning application process may enable a higher number of dwellings to be delivered on the site.</p>				
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	At present the estimated capacity of this site should remain at the 2016 DLP figure of 80 dwellings				

Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference	Site Address or Location	Town or Settlement		
	HS22 (BrP4)	Land west of Brookmans Park	Brookmans Park		
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019		
	Green Belt	250 dwellings	400 to 450 dwellings plus a 2FE primary school		
2019 Update	<p>The HELAA 2016 indicated that the site was suitable for 300 dwellings - the maximum number of dwellings that can be served by a single major point of access. The estimated site capacity of 250 dwellings in the DLP 2016 reflected the position set out in the Site Selection background paper 2016 on primary school provision at that time.</p> <p>In 2019, the promoter suggests that between 400 and 450 dwellings plus a 2FE primary school could be achieved on this site. However, the Highway Authority advises that any level of housing (or equivalent) over 300 dwellings would require a secondary point of access. Any primary or secondary point of access onto Bradmore Lane would only be supported if its design is carefully considered such that it does not encourage vehicles to arrive/depart from the west, and ensures that the junction of Bradmore Lane/Station Road is improved. Bradmore Lane is a narrow country lane and any proposals that would affect the nature of this road and encourage vehicles to route along it would result in considerable conflict and would be contrary to the rural roads policy. An emergency only access and/or measures along the length of Bradmore Lane to discourage rat running may be acceptable.</p> <p>At the current time, an indicative capacity in excess of 300 dwellings has not been found to be suitable in highway terms. Whilst further work, which could be carried out at a planning application stage, may be capable of overcoming concerns, this is not evidential at the plan making stage. (A secondary access onto Bradmore Lane may be acceptable, provided it can be shown that such an access would maintain the rural character of the road, comply with relevant highway safety standards and provide necessary mitigation measures).</p>				
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	An increase of 50 dwellings from the 250 indicated in the DLP 2016 to 300 dwellings is considered acceptable (consistent with the findings of the 2016 HELAA).				

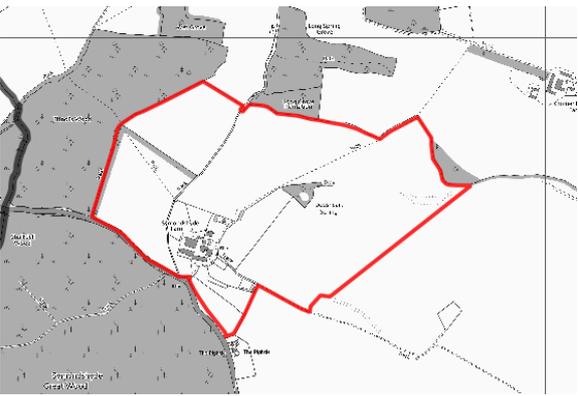
Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan/HELAA reference	Site Address or Location	Town or Settlement
	HS27 (Cuf1)	Land north of The Meadway	Cuffley
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019
	Green Belt	30	60+
2019 Update	<p>In the HELAA 2016, the site was considered suitable for development with an estimated delivery timescale of 0-5/6-10years (dependent upon the timely delivery of waste water network upgrades). The capacity was estimated at 30 dwellings in light of highways access issues and to allow for a buffer to the Cuffley Brook (north-east) and the railway line (west). In 2019, additional information has been submitted, suggesting a higher yield of 60+ dwellings could be achieved. The Highway Authority has reviewed this and advises that it would not be unreasonable to consider that the width of The Meadway could be rationalised along its length (there being sufficient verge/footway that the minor realignment necessary would be negligible in terms of impact). Parking controls displace much of the potential for on-street parking and residents of this site would have good access to rail and bus services. Hence, a higher capacity may now be considered. The operation of the junction of The Meadway/Station Road would need to be explored, but it is considered that this could be addressed at a planning application stage.</p> <p>The site proposed for allocation in the Draft Local Plan measures 2.9ha with the proposed Green Belt boundary not extending further east from the property boundaries of The Meadway. (However, not all of this area is considered suitable for development with an estimated net developable area of circa. 1.8ha addressing the presence of a Flood Zone, an easement for overhead powerlines and a buffer to the western boundary with the railway).</p> <p>In 2019 the potential for a larger gross site area of approximately 4.3ha has been promoted. However, at the plan making stage, it is not yet evidential that a detailed design and layout that adapts to the presence of the overhead powerlines, which dissect the site from north to south, would result in an acceptable form of development in excess of the 30 dwellings estimated for the site proposed for allocation in the Draft Local Plan.</p>		

Review of higher capacities promoted for sites already proposed for allocation
in the Draft Local Plan 2016

HS27 (Cuf1)		Land north of The Meadway			
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	Site HS27 (Cuf1) is proposed for allocation in the Draft Local Plan 2016 for 30 dwellings. A review of highway matters concludes that a higher capacity could be considered. However, should HS27 be carried forward, due to a number of site constraints, it is not evidential that a capacity in excess of 30 dwellings could be achieved. No change.				

Review of higher capacities promoted for sites already proposed for allocation in the Draft Local Plan 2016

	Local Plan (HELAA) reference	Site Address or Location	Town or Settlement		
	SDS6 (Hat15)	Symondshyde (new village)	Rural Areas		
	Urban / Green Belt	Capacity in Draft Local Plan 2016	Promoted capacity 2019		
	Green Belt	1,130	1,180 to 1,200		
2019 Update	<p>This site is due to be discussed at the hearings scheduled for November/ December 2019. It has an estimated capacity of 1,130 dwellings in the DLP 2016. Delivery is estimated across years 5-15, given the need for substantial highways and sewerage infrastructure to be put in place before development can be built and occupied. There is also a question of the phasing of development alongside that of sites Hat 1 and 13 which are within a 1km distance of the site. Development is constrained by the need to protect the setting of the listed Symondshyde Farmhouse and the historic park of the Brocket Estate. The site immediately adjoins Symondshyde Great Wood, Titnol's Wood and Long Spring Grove which are local wildlife sites and there is likely to be a need for buffer areas of landscape between the site and these woodlands. The site is also required to accommodate a small neighbourhood centre, community facilities, a new 2FE primary school, sustainable drainage measures, existing rights of way corridors, and both formal and informal open space.</p> <p>The landowner is now promoting an increase in capacity to between 1,180 and 1,200 dwellings on the site – an increase of between 50 and 70 dwellings. The justification for this is set out in the Call for Sites form and supporting statement, although there is little by way of detailed evidence. At 1,130 dwellings and a net developable area for housing of 42ha, development would be at a density of 20 dph (g) and 27 dph (n). There is concern that the net developable area may reduce due to possible ground stability issues in parts of the site. Any increase in numbers is also subject to the results of the July 2019 transport modelling work, and to any additional traffic demand on Coopers Green Lane, Green Lanes and the nearby A1(M) junction 4 not giving rise to severe impacts. The transport modelling work is testing 1,140 units at Symondshyde.</p>				
Suitable	Yes	Available	Yes	Achievable	Yes
Conclusion	<p>At this stage the estimated capacity of this site should not be increased above the 2016 figure of 1,130 dwellings. Any increases need to await the next stage of masterplanning work, to firm up on the net area available for housing development.</p>				