

Welwyn Hatfield Local Plan Examination

Stage 9 Hearings

***Further Sites for Housing Development,
submitted to the Examination by the Council***

EX237

Statement by Jed Griffiths MA DipTP FRTPI

On Behalf of

North Mymms District Green Belt Society

February 2021

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the North Mymms District Green Belt Society. It has been compiled in response by the Inspector to respond to a list of further sites for housing development which were submitted by Welwyn Hatfield Borough Council (WHBC) to the Examination in November 2020 (EX237).
2. The representations in this statement refer to five sites on which the Society has an interest, as follows:
 - Site WeG1 Welham Manor
 - Site WeG3a Station Road West
 - Site WeG10 North of Dixon's Hill Road
 - Site BrP1 Upper Bell Lane
 - Sites LHe4 and LHe5 Videne and Studlands, Hawkshead Road
3. In accordance with Inspector's guidance notes and the programme set out in EX237, the Society's comments address the matters, issues and questions in order. For all the sites, the Society has made earlier submissions, both to the Examination and to public consultations generated by WHBC. References will be made to previous representations where appropriate.

Matter 10 – Site WeG1, Welham Manor

Q41. Should the policy criteria contain parameters that seek to protect the integrity of the adjacent listed buildings?

4. According to Historic England, there are six listed buildings in Station Road near the site. These are as follows:
 - The "Hope and Anchor" public house.
 - 9 Station Road
 - Fairview, 15 Station Road
 - Woodbine Cottage, 27 Station Road
 - 31 Station Road
 - Crawford Cottages, 42-48 Station Road

The Society would support the insertion of policy criteria to protect the setting of these buildings.

Q42. Are there any robust highway reasons why this site should not be independently accessed from Welham Manor?

5. In its previous representations, the Society has referred to the unsuitability of the proposed access from Welham Manor, a narrow residential cul-de-sac. This seems to be acknowledged by the Borough Council which is now suggesting that vehicular access would be obtained from Station Road, via site WeG3a (see Matter 11 below). It would appear that, to a large extent, the development of WeG1 is dependent on the delivery of site WeG3a. Even if the latter were to be achieved, the Society would be concerned about excessive car parking and movements within the existing residential area of Welham Manor which make it inaccessible at times to emergency vehicles. Many concerns have been raised by local residents about highways capacity and road safety on Dixon's Hill Road. Development on this site would exacerbate these problems.

Q43. Are the job losses that would result from the redevelopment of this site justified?

6. The small industrial units on the site are in full use, and are providing local jobs and business activity. In terms of the contribution of these sustainable businesses to the local economy, their loss is not justified.

Q44. Should some or all of the trees on the site be retained and their retention be referred to in the policy criteria.

7. There are a number of mature trees on and around the site which contribute much to the character of the area and its setting on the edge of the village. Should the site be allocated, there should be a rigorous assessment of the trees, supported by policy criteria which indicate which specimens should be retained and protected. In these circumstances, the Society would advocate the use of Tree Preservation Orders.

Q45. If the site was to be independently developed, is it possible to provide a robust boundary to the Green Belt?

8. In its previous representations, the Society has pointed out that, in both Green Belt and landscape terms, there is no robust and defensible boundary on the southern edge of the site. Its development would clearly extend the edge of the village into the area of farmland, encroaching into the open countryside. The development would be visible from dwellings on the west side of Station Road, from Dixons Hill Road, Manor Close, and from footpaths to the west and south.

Q46. What is the planning status and development potential of the land of the north east?

9. The Society notes that a planning application has been made to WHBC for the development of this Green Belt land for housing (Reference 6/2021/0163/FULL). It was originally promoted for development (as WeG1) in the Call for Sites consultation in 2014, but was not included in the Submission Local Plan 2017. The Society intends to object to the current planning application.

Q47. Could this site be developed within five years of the adoption of the plan?

10. No comment.

Matter 11 – Site WeG3a, Station Road West

Q48. Is there any objective basis on which the assessed Green Belt harm could be challenged?

11. The Society notes that this site was assessed as “moderate harm” in terms of the potential impact of housing development on the Green Belt. In its response to the Call for Sites consultation in January 2019, the Society contested this assessment. Although the site is fairly level on its northern edge, it slopes downwards to the south, and is very open in appearance. Development of the site would therefore encroach severely onto the open countryside, which is enjoyed by the users of the footpaths which cross the area.

Q49. Would development on this site intrude into the gap between Brookmans Park and Welham Green?

12. The Society has pointed out that development of the site would be a prominent feature in the local landscape, especially when viewed from the south. In the Green Gap Assessment (EX160), the site is shown within an area proposed as a “Green Gap” policy area.

Q50. Is it possible to establish a permanent and robust boundary along the southern edge of this site?

13. Bearing in mind the topography and the open nature of the site, particularly on its southern edge, the Society believes that it would be extremely difficult to establish a permanent and robust Green Belt boundary.

Q51. What is the planning status and development potential of the land to the north east of the site?

14. See the answer to Question 46 above.

Q52. Are there any issues affecting highway safety and the free flow of traffic along Station Road that are incapable of satisfactory resolution?

15. In its response to the 2019 Call for sites, the Society referred to the difficulties of providing a satisfactory vehicular access to the site. From the Council's plans of the site, it would appear that the access from Station Road would be extremely narrow. The increase in traffic arising from an additional 70 dwellings would impact on Station Road, and would need to be addressed at the junction with the site access road. It is submitted that the main impact on traffic flow and highway safety would be at the junction of Station Road and Dixons Hill Road, in the centre of the village. As a general point, the Society has commented that no account has been taken of the possible cumulative impact of all the sites being considered in Welham Green, including those listed in EX238. There should also be an assessment of the potential traffic and highways impact of the potential large-scale developments in Colney Heath and around London Colney which have been promoted sites in the Local Plans for St. Albans and Hertsmere.

Q53. Should some or all of the trees on the site be retained and their retention referred to in the policy criteria?

16. The mature trees on and around the site which should be retained and protected – this should be addressed in policy criteria. Tree Preservation Orders should be used to ensure long-term protection.

Q54. Should the policy criteria make reference to a requirement for the working of any suitable sand and gravel reserves found on the site?

17. The Society is not aware of any suitable sand and gravel deposits on this site.

Q55. Has the site's capacity for residential development been objectively assessed?

18. The capacity of the site for 70 dwellings would appear to be in line with the density assumptions made in the Local Plan.

Q56. Should the policy criteria contain parameters that seek to protect the setting of the adjacent listed buildings?

19. There are six listed buildings on Station Road, the protection of which should be addressed in policy criteria – see answer to Q41 (paragraph 4) above.

Q57. Could this site be developed within five years of the adoption of then plan?

20. In the view of the Society, development of the site within five years of adoption would be difficult.

Matter 12 – Site WeG10, North of Dixons Hill Road

Q58. Is there any objective basis on which the assessed Green Belt harm could be challenged?

21. In Table WeG10 of the site allocations consultation document of January 2020, the Borough Council consider that the potential harm to the Green Belt would be “moderate”. The Society disagrees with this assessment – this is a very open site on the edge of the village, forming a very distinctly distinctive transition between the existing built-up area the countryside beyond. The Green Gap Assessment (EX160) considered that the site was in the potential “Green Gap Policy Area” to the south of Hatfield and the west of Welham Green.

Q59. Would the proposal adversely affect ancient woodland? And, if so, could a suitable compensatory strategy be developed?

22. Development on this site would have an adverse impact on Bush Wood on the northern edge of the site. This is an ancient woodland and wildlife site (WS88) and is important not only for its biodiversity and wildlife value, but also as a strong landscape feature on the edge of Welham Green. It also managed and much used by local residents, and is essential for outdoor recreation, with benefits for health and well-being.

Q60. Should some or all of the trees on the site be retained and their retention be referred to in policy criteria?

23. There are some hedgerow trees on the edge of the site. If the site were to be allocated, their retention and protection should be included in policy criteria.

Q61. Is it necessary to provide a permanent and robust boundary to the Green Belt along the western boundary of this site?

24. As stated in the Society’s response to EX223, the western boundary of the site is very open. If it were allocated for housing, the definition and reinforcement of this boundary would be critically important.

Q62. Would the development of this site give rise to severe impacts on highway safety and the free flow of traffic?

25. Many concerns have been raised by local residents about highways capacity and road safety, particularly along Dixons Hill Road. The road has become increasingly busy over the years, as it provides a direct link to the A1(M) to the west of the village. There are issues with speeding traffic, despite traffic calming measures in the centre of the village. When the M25 is closed or congested, traffic tends to use Dixons Hill Road as a diversionary route both from junctions 22 and 23, as well as the A1(M). These movements cause considerable congestion on local roads.

Q63. Should the policy criteria make any reference to a requirement for the working of any suitable sand and gravel reserves found on the site?

26. The Society is not aware of any suitable sand and gravel deposits on this site.

Q64. Has the site's capacity for residential development been objectively assessed?

27. No regard has been taken of the frequent surface water flooding that occurs at the south eastern part of the site, which in severe weather conditions floods Dixons Hill Road. The proximity of the site to the Water End SSSI has not been fully recognised.

Matter 13 – Site BrP1, Bell Lane

28. The Society has been strong in its resistance to the development of this site. Bell Bar is a distinctive settlement, “washed over” by the Green Belt. It has no direct road connection with Brookmans Park. Development of this site would add an isolated development onto the edge of Brookmans Park, extending into the surrounding Green Belt. The proposed changes to the Green Belt boundary would include existing properties to the north, west, and south of the site, and would lead to pressures for further infilling.

Q65. Is there any objective basis on which the assessed Green Belt harm could be challenged?

29. Although development of the site has been assessed as “moderate harm”, the Society would point out that it is of vital importance in that it separates Bell Bar from Brookmans Park. The Society has challenged the assessment of “moderate harm” on the basis of the openness of the site, in particular the extensive views it offers over the Hertfordshire countryside to the north-west. In the earlier Green Belt Review of 2015, the Borough Council acknowledged that the site was “significant” against the local objective of maintaining the settlement pattern. Its essential openness is of fundamental importance in terms of its contribution to local character. In the Stage 3 Green Belt Review, all of the adjacent parcels have been assessed as “moderate/high harm” and it is perverse this field has been given a lower rating.

Q66. Should the policy criteria contain any parameters that seek to protect the setting of any adjacent listed buildings?

30. There are listed buildings within Bell Bar. The Society agrees that this should be recognised in any policy criteria.

Q67. In the context of the site's proximity to retail and community facilities and frequent public transport, is this a sustainable location for housing development?

31. The claim that this is a sustainable site is nonsensical. Although the Chancellors Secondary School is nearby, the site is not within walking distance of the Brookmans Park village centre and its range of facilities and services, including the railway station. It is also remote from the local primary school in Bradmore Way. Public transport at the site is virtually non-existent. It is clear that housing development at the site would generate larger than average trips by car.

Q68. Should all of the trees on the site be retained and referred to in the policy criteria?

32. There are mature trees on the edge of the site and their retention and protection should be included in policy. Equally important are the mature hedgerows on the site boundary, which are important for biodiversity and landscape conservation.

Q69. Should the policy criteria make reference to a requirement for the working of any suitable sand and gravel reserves found on the site?

33. The Society is not aware of any suitable sand and gravel reserves on this site.

Matter 14 – Site LHe4/5, Videne and Studlands, Hawkshead Road

Q70. Is there any objective on which the assessed Green Belt harm could be challenged?

34. In the Stage 3 Green Belt Study, the site was assessed as part of Parcel P80, with a harm rating of "high". It was also considered as a part of sub-parcel P79/80, with a rating of "moderate". The later conclusion, however, was based on the assumption that Swanley Bar would be inset from the Green Belt, but that has not been proposed. According to the Green Gaps Assessment (EX160), the area is part of a "most essential" area of Green belt. The decision to recommend these sites for allocation is not soundly based.

Q71. In the context of the site's proximity to retail and community facilities and frequent public transport – is this a sustainable location for housing development?

35. The sustainability credentials of these sites are challengeable. Although Hawkshead Road is on a bus route, the area is not within walking distance of the nearest shopping centres in Potters Bar – the nearest railway station is at Darkes Lane, Potters Bar. The local primary school is at capacity – the problems of education provision were exposed at the Stage 6 hearings, in the session on Site BrP7.

Q72. Are there any perceived infrastructure constraints that are incapable of being resolved before the end of the plan period?

36. There are none.

Q73. Should the policy criteria contain any parameters that seek to protect the setting of the adjacent listed buildings?

37. There should be some recognition in the policy parameters.

Q74. Should some or all of the trees on the site be retained and their retention referred to in the policy criteria?

38. There are some mature trees on and adjacent to the site, the retention and protection of which should be included in the policy criteria. There should be a comprehensive tree survey of the area – Tree Preservation Orders should be used appropriately.

Q75. Has the site's capacity for residential development been objectively assessed?

39. The Society notes the Council's justification for the development of these sites, but they appear to have been introduced as an afterthought, to make up the housing supply numbers.

Q76. Is the suggested new Green Belt boundary in the most appropriate location?

40. The suggested new boundary for the Green Belt is too tightly drawn to the eastern boundaries of the sites, and is irregular in its shape. This is contrary to the advice in the NPPF 2012. As suggested in the Society's response to EX223, more thought needs to the treatment of the boundary as a whole, including the provision of extensive tree planting.

Q77. Is there scope to extend the development area or the Green Belt boundary to the north or north-east?

41. There is no scope to extend the development area. As stated by the society in its previous submissions, the development of these sites would result in a continuous strip of housing to the north of Hawkshead Road, effectively joining Little Heath and Swanley Bar. The openness of the Green Belt would be severely compromised.

SUMMARY

42. In accordance with the Inspector's guidance, this statement has addressed the issues and questions as set out in the agenda. The Society will take the opportunity to elaborate on the issue at the Stage 9 hearings. Any of the points made in this statement are **without compromise** to the Society's previously stated objections to the development of the sites.

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Hertford

11th February 2021