

Welwyn Hatfield Local Plan Examination

Stage 9 Hearings

***Potential Additional sites, for Housing
Development, at Villages excluded from the
Green Belt (EX238)***

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 to an invitation by the Examination Inspector to comment on a list of potential additional sites for housing development in the Welwyn Hatfield Local Plan (EX238).
2. All of the sites listed are in the Green Belt. Although they have been promoted in the Call for Sites consultations in 2015 and 2019, none have been submitted by Welwyn Hatfield Borough Council (WHBC) to the Examination for inclusion in the Local Plan. The representations in this statement refer to six sites in which the Society has an interest, as follows;
 - Site WeG6 Skimpans Farm
 - Site WeG12 Land North of Pooley's Lane
 - Site WeG15 Land at Potterells Farm
 - Site WeG17 Land South of Dixon's Hill Road
 - Site BrP12a Land North of Peplins Way
 - Site BrP34 Brookmans Park Transmitting Station
3. In accordance with the Inspector's guidance notes and the draft programme set out in EX238, the Society's comments address the matters, issue, and questions in the order of the agenda. For all the above listed sites, the Society has lodged objections in response to the Call for Sites and other consultations. Reference will be made to previous submissions where appropriate.

Matter 3 – Site WeG6, Skimpans Farm

Q36. Is there any objective basis on which the assessed Green Belt harm could be challenged, or the weight given to the findings reduced?

4. The assessment of "moderate" harm is noted, but Bulls Lane, at the northern boundary of the site, forms a very robust edge to the built-up area of Welham Green. In the earlier Stage 2 Green Belt Study, the site was assessed as "significant" against Green Belt purposes, particularly in terms of prevention of encroachment into the countryside. The open nature of the site is a very important consideration.

Q37. Would the site's boundary with the Green Belt require any further strengthening?

5. As shown on the site map, the northern boundary is described by Bulls Lane, and the eastern boundary is adjacent to the railway embankment. To the south, if the area were to be developed, strengthening would be required along the Skimpans Brook. To the west, there are open views from Station Road into site, which would need some degree of screening.

Q38. Would development at this site impact upon the open break between Brookmans Park and Welham Green and, if so, would this be harmful? Either way, give a reasoned justification.

6. Development of this site would have a harmful impact on the gap between Welham Green and Brookmans Park, as recognised in the Green Gaps Assessment. Promoters of the site have mentioned the presence of woodland to the south, which in their view would provide a landscape screen. Nevertheless the wood does form a very important part of the gap and its character must not be threatened by housing development.

Q39. Should some or all of the trees on the site be retained and their retention referred to in the policy criteria?

7. The site is mainly open but there are some trees and hedgerows which should be retained and mentioned in policy criteria.

Q40. What impact would the proposed development have on ecological assets within or adjacent to the site and to what extent could this be mitigated or compensated for?

8. The main area of the site is composed of pasture land of low interest, but the southern and eastern fringes are much richer in terms of biodiversity. Beyond the Skimpans Brook, the area of woodland is of some interest, with a wider range of flora and fauna.

Q41. In the context of the site's proximity to retail and community facilities and frequent public transport, to what extent can this be considered as a sustainable location for development?

9. The site is near to the Welham Green Community Hall and the doctors' surgery and there is a bus service on Station Road. It is on the edge of the village, however, and is further away from the village centre, the local primary school, and the railway station.

Q42. Are there any perceived infrastructure constraints that are incapable of resolution within the plan period?

10. In previous discussion on this site and others in Welham Green, there has been some uncertainty about sewage and drainage capacity. Thames Water has determined that these issues can only be resolved when all the allocations in the Local Plan have been confirmed. The Society understands that there are particular problems of capacity in the area to the south of Hatfield.

Q43. What is the nature of the alleged flood risk and is it capable of being resolved through mitigation?

11. Part of the site is located, towards the Skimpans Brook, is located within Flood Zones 2/3. There is also a history of surface water flooding on the site. There are well-recorded instances of flooding on properties adjacent to the site in Station Road, which Thames Water has been unable to resolve. To the east, Bulls Lane frequently floods and is often impassable as a result. There is some doubt as to whether the problems of flooding can be resolved without a comprehensive approach.

Q44. Are there any issues affecting highway safety and/or the free flow of traffic along Bulls Lane that are incapable of satisfactory resolution?

12. Access to the site would appear to be from Bulls Lane, which is a narrow unclassified route connecting Welham Green with Bell Bar to the east. The bulk of traffic using the site would use Station Road, which is particularly busy at peak hours. To the west of the site, there are dangerous bends in Station Road where it descends to cross the Skimpans Brook. In its representations, the Society has also referred to the cumulative impact of this and other proposals on highway capacity and safety on Dixon's Hill Road.

13. The Society has raised concerns about the additional traffic that would be using Bulls Lane, which connects with Bell Lane to the east. Both these lanes are signed by Hertfordshire County Council as a "Recommended Route for Pedal Cycles" and promoted as part of the aim to promote and manage the enjoyment of the countryside. The routes are also used by horse riders. Bulls Lane has been extensively damaged by increases in traffic which would be compounded by development at this site. It cannot be looked at in isolation – the cumulative effects of other potential developments in Welham Green would have to be assessed, as well as the proposal at Bell Lane (BrP1). The last-mentioned, if implemented, would present a real challenge for recreational users of Bell Lane.

Q45. Could noise or air pollution be an issue that precluded development of this site?

14. Noise from the main railway, which is raised on an embankment, would be an issue to the east of the site.

Q46. To what extent (if any) could development on the site harm heritage assets?

Q47. Could any of this be significant?

Q48. Can any perceived harm be appropriately mitigated?

15. In its previous representations, the Society has raised considerable concerns about the impact of the development on the Grade II listed Skimpans Farm and Granary, and its setting. Archaeological data suggest that there have been buildings on the site dating back to the early 14th century. The existing building is the only period farmhouse left in Welham Green and is of great historical importance. The openness of the adjacent land is an important component of its setting. The Hertfordshire Gardens Trust have provided evidence of a park and pleasure garden that existed on the site in the 18th and 19th centuries and have objected to the development of the wider area for housing.

Q49. Would the proposal be clearly within the first five years following adoption?

16. It is doubtful whether the development could be delivered within the first five years, mainly because of the uncertainty about drainage capacity.

Q50. Are there any other issues that weigh against this site being proposed for development?

17. See above.

Matter 4 – Site WeG12, Land to the north of Pooley’s Lane.

Q51. Is there an objective basis on which the assessed Green Belt harm could be challenged, or the weight given to the findings reduced?

18. The Society has previously objected to this site on Green Belt grounds. The harm rating of “moderate” does not fully take into account the very open nature of the site. It is noted that the Green Gap Assessment (EX160) included the land as part of the important gap between the south of Hatfield and Welham Green.

Q52. Is it possible to provide a permanent and robust boundary to the Green Belt along the northern and western boundaries of this site?

19. The site is part of a very open tract of countryside to the north and west. In view of this, it is difficult to envisage a new boundary which would not harm this essential character.

Q53. Would development of this site impact on the open break between Hatfield and Welham Green? If so, would this be harmful? Either way, give a reasoned justification.

Q54. Has there been a comprehensive assessment of the need for an open break between Southern Hatfield and Welham Green?

Q55. If such an assessment concluded in the positive, what is considered to be the most appropriate location for such a break in the context of all the existing development in this area between Pooley's Lane and South Way?

20. As suggested by the comprehensive Green Gap Assessment, the site does occupy part of the important gap between Hatfield and Welham Green. Pooley's Lane does provide a firm and robust boundary on the southern edge of the site and is entirely appropriate as part of the open break.

Q56. If this site were to be developed, what would be the most appropriate long term Green Belt boundary to be located to the north?

Q57. Would this require any strengthening such as additional planting or earth mounding?

21. If this site were to be developed, the most appropriate boundary to the north would be on the ridge line. Consideration would have to be given to the possible development of site HS11 and its relationship to this site and to New Barnfield. Additional planting would be essential, but not any physical features.

Q58. Should some or all of the trees on the site be retained and their retention be referred to in the policy criteria?

22. There are no significant trees on this site.

Q59. What impact would the proposed development have on ecological assets within or adjacent to the site and to what extent could this be mitigated or compensated for?

23. There is a designated wildlife site (WS100) to the east of the proposed development, which is valued for its grassland species and habitat. It is believed that Great Crested newts have been observed on the site. There would undoubtedly be a harmful impact arising from housing on adjacent land.

Q60. In the context of the site's proximity to retail and community facilities and frequent public transport, to what extent can this be considered to be a sustainable location for development?

24. In terms of the village community, this site is remote from the central shops and is not served by any public transport. As such, it is not a sustainable location for housing development.

Q61. Are there any perceived infrastructure constraints that are incapable of resolution before the end of the plan period?

25. The site is within the area to the south of Hatfield which does have problems of sewage and drainage capacity. Thames Water has not expressed a willingness to deal with the issues until the final allocation of sites in the Local Plan.

Q62. Are there any issues affecting highway safety and/or the free flow of traffic within Welham Green that are incapable of satisfactory resolution?

26. The site is not easily accessible by road, and is currently reached by a narrow track leading from Parsonage Lane. Parsonage Lane and Pooley's Lane have limited capacity, which is exacerbated by the numbers of parked vehicles. The increased volume of traffic generated by the site would cause more congestion and accessibility problems, not only adjacent to the site but also to the centre of Welham Green.

Q63. What is the nature of the alleged flood risk and is it capable of resolution through mitigation?

27. There are frequent problems with surface water flooding associated with the site. The southern edge of the site is most affected, together with Pooley's Lane and the bottom of Huggins Lane.

Q64. Could noise or air pollution be an issue that precluded development at this site?

28. The site is adjacent to the very large Welham Green industrial estate to the east and a distribution centre to the north. There may be issues of noise and fumes.

Q65. Would the proposal clearly be deliverable within the first five years following adoption?

29. Owing to the difficulties outlined above, it is doubtful whether development could be delivered within the first five years following adoption.

Q66. Are there any other matters that weigh against this site being proposed for development?

30. As outlined by the Society in its previous submissions, the site does have footpaths crossing it, which are well used by local residents. It is also used by horse riders, and there is stabling on the site. It is also on the route of the Great North Cycleway.

Matter 5 – Site WeG15, Land at Potterells Farm

Q67. Is there any objective basis on which the assessed Green Belt harm could be challenged?

31. The Society notes the assessment of the site as “moderate-high harm”, but considers that it should rightly be categorised as “high”. The site is very open in nature and this has been recognised in the Stage 3 Green Belt Review. Development in this location would clearly compromise the openness of the Green Belt and encroach onto the tract of countryside to the west of Welham Green.

Q68. Is it possible to provide a permanent and robust boundary to the Green Belt along the southern and western boundaries of this site?

32. As described above, the site is extremely open, and slopes upward from the southern edge. It would therefore be extremely difficult to provide a satisfactory boundary.

Q69. Would development at this site impact on the open break between Brookmans Park and Welham Green in a harmful way? Either way, give reasoned justification.

33. The development would have a considerably harmful effect on the open gap between Welham Green and Brookmans Park, and the more strategic gap between Hatfield and Potters Bar. This is confirmed by the Green Gaps Assessment (EX160), which also suggests that the site should be included in a Green Gap Policy Area.

Q70. Are there any perceived infrastructure constraints that are incapable of resolution before the end of the plan period?

34. See answer to Question 42 (paragraph 10 above).

Q71. Are there any issues affecting highway safety and/or the free flow of traffic along Station Road that are incapable of satisfactory resolution?

35. Access to the site would be on a particularly difficult and dangerous place on Station Road, near its junction with Bulls Lane. To the south, as Station Road descends towards the Skimpans Brook, there is a sharp bend, within a 40 mph speed limit, where there are problems with fast-moving vehicles. It is probable that the majority of trips associated with the development would be by car, which would exacerbate the problems which exist.

Q72. What is the nature of the alleged flood risk and is it capable of resolution through mitigation?

36. As stated by the Society in its previous representations, the main concern about flood risk and drainage is related to the Skimpans Brook, which is beyond the southern boundary of the site. Any surface run-off from the site would run into the Skimpans Brook and the Mimms Hall Brook which runs directly into the Water End Swallow Holes SSSI. The proposals by the site promoters would be insufficient to prevent major flooding and hydrological damage at the Water End.

Q73. Could noise or air pollution be an issue that precluded development at this site?

37. There are no known pollution problems associated with the site.

Q74. To what extent (if any) could development on the site harm heritage assets?

Q75. Could any of this be significant?

Q76. Could any perceived harm be appropriately mitigated?

38. There is one listed building in the vicinity of the site "Walled Gardens and Adjoining House at Potterells, which is Grade II. The effect of the proposed development would not be significant.

Q77. What effect would the proposed development have on ecological assets within or close to the site and to what extent could be mitigated or compensated for?

39. The main effect would be on the nearby Water End SSSI, the surroundings of which include an important wetland habitat.

Q78. In the context of the site's proximity to retail and community facilities and frequent public transport, to what extent can this site be considered to be a sustainable location for development?

40. See answer to Question 41 (paragraph 9 above).

Q79. Would it be possible to independently develop the north-western part of this site?

41. No comments.

Q80. What evidence is there to confirm that this proposal could deliver dwellings within the first five years following adoption?

42. There is no evidence to confirm whether the site could be delivered within the first five years. The difficulties about drainage make this unlikely.

Q81. Are there any other matters that weigh against this site being proposed for residential development?

43. The bulk of the site is arable farmland which should be protected from development in accordance with paragraph 112 of the NPPF 2012.

Matter 6 – Site WeG17, Land south of Dixon’s Hill Road

Q82. Is there any objective basis on which the assessed Green Belt harm could be challenged, or the weight given to the findings be reduced?

44. The Society notes the “moderate-high” harm rating, but considers that this should be elevated to “high”. As described by the Society in its previous submissions, this is a very open site, part of an extensive tract of countryside to the south west of Welham. Development on this site would severely encroach on this rural landscape. In the Green Gaps Assessment (EX160), the land was part of the gap between Hatfield and Potters Bar. It was suggested that it should be included in a Green Gap Policy Area.

Q83. How much additional capacity does the existing school have>

Q84. To what extent could it be extended?

Q85. What is the rationale behind the need for a new primary school at Welham Green?

Q86. Would it replace the existing school or supplement it?

Q87. Which alternative sites have been considered as possible sites for a new school and what were the outcomes of the assessments?

Q88. Could highway safety issues on Dixon’s Hill Road preclude the development of the site for a new school?

Q89. Could noise or air pollution be an issue that precluded the development of this site for a new school?

45. The Society understands that the existing primary school is at capacity. Discussions have been had at previous hearings about the education provision and whether additional places could be provided in connection with housing developments by way of a legal agreement. In the Society's view, extra school places should not be delivered at the expense of the Green Belt and the cumulative pressures on local services and facilities.

46. The practical aspects of school provision are questions that can only be addressed by Hertfordshire County Council (Questions 83-87). With regards to highway safety issues, the Society has in other responses referred to the problems that would occur on Dixon's Hill Road in relation to additional housing development. It is clear that additional schools places can only be provided by means of additional housing – this in turn would exacerbate the problems of highway safety and the free flow of traffic on Dixon's Hill Road.

Q90. Are there any perceived infrastructure constraints that are incapable of resolution before the end of the plan period?

47. There are issues relating to sewage and drainage capacity -see answer to Q43 (paragraph 11) above.

Q91. What is the nature of the alleged flood risk and is it capable of resolution through mitigation?

48. Surface water flooding does occur at the northern edge of the site adjacent to Dixon's Hill Road (see answer to Site WeG10).

Q92. What impact would the development have on ecological assets within or close to the site and to what extent could this be mitigated or compensated for?

49. There would be some localised impact on the hedgerows on the northern boundary of the site. In the wider area, there would be some limited impact on Bush Hill Wood and the Water End SSSI to the south west.

Q93. Are there any other matters that weigh against this site being prosed for residential development?

50. The bulk of the site area is arable farmland, which should be protected under paragraph 112 of the NPPF.

Matter 7 – Site BrP12a, Land North of Peplins Way

Q94. Is there any objective basis on which the assessed Green Belt harm can be challenged, or the weight given to the findings reduced?

51. The Society notes the assessment of harm as “moderate-high”, but considers that this should be raised to a “high” ranking. It is an elevated and very open site and makes a major contribution to the purposes of the Green Belt. Its development would project beyond the settlement edge of Brookmans Park, which forms a strong and robust Green Belt boundary.

Q95. Would development on this site impact on the open break between Brookmans Park and Welham Green in a harmful way? Either way, give reasoned justification.

52. In its previous submissions, the Society has pointed out the role of this site in maintain the gap between Brookmans Park and Welham Green. The site promoters have argued that the development would be contained by Peplins Wood, which would define a new Green Belt boundary. In the Society’s view, this misses the point about the role of a gap, which is not only visual but also environmental in that it provides space for wildlife and recreation. The importance of the gap in this area was acknowledged in the Green Gaps Assessment (EX160).

Q96. Should some or all of the trees on the site be retained and their retention be referred to in the policy criteria.

53. The Society agrees with this suggestion. It should be subject to a detailed tree survey and the use of Tree Preservation Orders for future protection.

Q97. What impact would the proposed development have on ecological assets within or adjacent to the site and to what extent could this be mitigated or compensated for?

54. To the north of the site is Peplins Wood, which is a designated Ancient Woodland and Wildlife Site (WS146). Because of its close proximity the development would have an adverse effect on the woodland habitat and species. In previous consultations, Herts Ecology has pointed out that the bulk of the site is an Ecosite (Meadow South of Peplins Wood (78/063) an adjacent to Peplins Wood (78/021) and Brookmans Park Golf Course (78/064).

Q98. In the context of the site’s proximity to retail and community facilities and frequent public transport, to what extent can this site be considered to be a sustainable location for development?

55. The site is located to the north of the Brookmans Park village centre and its range of facilities and services and the local railway station. The local primary school is in Bradmore Way. There is no public transport at the site, however.

Q99. Are there any perceived infrastructure constraints that are incapable of resolution through mitigation?

56. There are no known infrastructure constraints, apart from highways issues (see below).

Q100. What is the nature of the alleged flood risk and is it incapable of being resolved through mitigation?

57. Surface water flooding occurs on part of the site, but has not been raised as an issue.

Q101. Are there any issues affecting highway safety and/or the free flow of traffic along Peplins Way that are incapable of satisfactory resolution?

58. There are major problems with highways and access which, in the Society's view, are incapable of being resolved. A detailed account of these issues was submitted to the Council by the Society in its response to the Local Plan Consultation Document in 2015. There are severe existing problems of congestion and conflicts in Peplins Way and Bradmore Way, even during off-peak periods. The site promoters have stated that this is due to resident's car parking, but the carriageway itself is too narrow at 4.3 metres. There are particular problems when parents and pupils are accessing the primary school. It is clear that the addition of over 65% additional dwellings in this area, plus a care home, would breach the capacity of the area to absorb further traffic movements.

Q102. Could noise or air pollution be an issue that precluded development at this site?

59. Noise from the East Coast main railway line could be an issue, as it is exposed on an embankment to the west of the site.

Q103. To what extent could development on the site harm heritage assets?

Q104. Could any of this be significant?

Q105. Could any perceived harm be appropriately mitigated?

60. There no heritage asset on or near this site.

Q106. Would the proposal be clearly deliverable within the first five years following adoption?

61. The proposal would not be deliverable within five years of the adoption of the Local Plan, mainly because of the insurmountable problems associated with highways and access.

Q107. Are there any other matters that weigh against this site being proposed for residential development?

62. There would be major difficulties with construction traffic using the narrow access roads, which in the view of the Society would preclude any major development.

Matter 8 – Site BrP34, Brookmans Park Transmitting Station

Q108. Is there any objective basis on which the assessed Green Belt harm could be challenged?

Q109. Is the harm to the Green Belt the same across the entire site?

Q110. If not, does the justification for the removal of this site from the Green Belt apply equally across the whole site?

63. The Society agrees with the assessment of harm on this site. But for part of the area being covered by buildings, the rating would be raised to “high”. As the Society has pointed out in its response to the Call for Sites, the site is located in a very important area of Green Belt and open countryside to the east of the A1000. It is very open in nature, particularly in long views from the east and north east, across extensive areas of agricultural land. In the Society’s view, the site should be considered as a whole.

Q111. Should the location of a new Green Belt boundary to the south-east of the site follow the site perimeter or does a more defensible and enduring boundary to the Green Belt exist outside of the site?

64. If the site were to be developed, it is important that the boundaries around it are drawn tightly and reinforced, particularly on the south-eastern edge. An open gap between the site and the properties in Kentish Lane should be maintained.

Q112. Should some or all of the trees on the site be retained and their retention referred to in the policy criteria?

65. The Society agrees with this suggestion, which should be determined by a comprehensive tree survey and the use of Tree Preservation Orders.

Q113. What impact would the proposed development have on ecological assets within or adjacent to the site and how could this be mitigated or compensated for?

66. Only a small part of the site is built-up – the rest is believed to be rich in wildlife but it has not been comprehensively surveyed. Should development occur, this should be addressed in policy criteria.

Q114. In the context of the site's proximity to retail and community facilities and frequent public transport, to what extent can this site be considered to be a sustainable location for development?

Q115. In the officer commentary, it is pointed out that any sustainability concerns could be dealt with in the same way as for BrP1.

Q116. How are they overcome at BrP1?

67. This is not a sustainable location for development – see the Society's response to Site BrP1. The issues cannot be overcome in the manner suggested by WHBC officers. If developed, its size and scale would be such that it would become a whole new area requiring its own services, thus creating more pressures on the local area.

Q117. Are there any perceived infrastructure constraints that are incapable of resolution before the end of the plan period?

68. The Society has referred elsewhere in these submissions to the general problem of sewage and drainage capacity to the south of Hatfield which has not been fully addressed by Thames Water.

Q118. What is the nature of the alleged flood risk and is it capable of resolution through mitigation?

69. The Society is not aware of any flood risk associated with this site.

Q119. Are there any issues affecting highway safety and/or the free flow of traffic along the A1000 that are incapable of satisfactory resolution?

70. In its previous representations, the Society has raised serious concerns about the cumulative impact of developments on the A1000. With the direct access to the site from the A1000, it is clear that the large-scale development of 300 dwellings and 10,000 square metres of employment space would have a considerable impact on the capacity of the highway. If development were to proceed at Site BrP1, this would be compounded.

Q120. Could noise or air pollution be an issue that precluded development at this site?

71 There are no known issues relating to air or noise pollution, apart from the increase in road traffic.

Q121. What is the justification for the extent and amount of development at this site?

72. There is no justification for the amount and scale of development at this site, compared to the low level of activity which exists. This proposal is an opportunistic response to the Call for Sites consultation.

Q122. What evidence is there to demonstrate that if the site were to be allocated for development, 300 dwellings and 10,000 square metres of employment floorspace could be delivered by the end of the plan period?

73. No evidence has been provided to show the development could be delivered by the end of the plan period.

Q123. Are there any other issues that weigh against this site being proposed for residential development?

74. There are no other issues which the Society would wish to raise.

SUMMARY

75. In summary, the Society fully supports the Borough Council's decision not to propose any of the above sites for development in the Local Plan. The Society welcomes the opportunity to elaborate at the Stage 9 hearings on the points made in this statement and at earlier stages of the Local Plan process.

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Hertford

12th February 2021