

**Examination of the Welwyn Hatfield
Local Plan**

**Council's Statement for the
Stage 4 Hearing on
Tuesday 26th June 2018**

Session 14

**SADM21 Housing allocations in Welwyn
Garden City, HS1 Bericot Way and
Waterbeach, HS2 Creswick, HS6 Land at
Gosling Sports Park, HS7 Land at
Waterside**



Policy SADM21 – Housing Allocations in Welwyn Garden City

13) Are the proposed dwelling capacities for the individual “other key housing sites” appropriate in their context within Welwyn Garden City?

14) If not, what is the justification for the departure(s)

Welwyn Hatfield Response

- a) There are nine “*other key sites*” listed in Policy SADM21. The estimated dwelling capacities for these sites are justified by the evidence base, which is proportionate to the preparation of a Local Plan. The Housing and Economic Land Availability assessment 2016 (HELAA) (HOU/19) sets out the overall HELAA methodology including the approach adopted for assessing capacities on urban housing sites (paragraphs 2.6.13 to 2.6.18).
- b) As noted in the HELAA, the assessed urban housing sites are located in a wide variety of existing development contexts. Both the NPPF and policies in the District Plan and (draft) Local Plan require development proposals to make effective use of urban land. However, recognising that characteristic density around the borough varies significantly, the HELAA used a range of density scenarios for urban sites.
- c) The Council’s earlier Strategic Housing Land Availability Assessment (SHLAA) work reported in separate documents on the assessment of urban sites and sites outside urban areas. The urban sites work had been informed by design case studies¹ which resulted in 18 dwelling capacity scenarios with densities that ranged from 30dph to 90dph to reflect their context whereas the non-urban SHLAA work had been informed by a different set of scenarios² with densities reducing as site sizes increased to provide for serving infrastructure and green space.
- d) The most recent assessment, the HELAA 2016, incorporated site assessments for both urban and Green Belt/ASR sites and in order to take a more consistent approach, a ‘baseline scenario’ was adopted as a starting point for all sites. Three additional scenarios for urban sites were devised based on the previous case studies – medium density (50dph), high density (70dph), and very high density (90dph) taking into account site context and size. In addition, account was taken of any pre-existing established position on dwelling capacity, e.g. as a result of progress through the planning application process or as a result of an adopted SPD. In such circumstances, ‘special case’ scenarios would be identified.
- e) Each site assessment template in the HELAA contains a *Site capacity* section. This sets out the relevant HELAA scenario used as a starting point. The comments section then explains where any adjustments (*departures*) were made from the starting point taking into account of the site’s context, any constraints or other site specific considerations. This level of sensitivity testing seeks to ensure that the estimates are a robust basis for allocation and reflect a site’s context within the

¹ Tribal Architects

² URBED/Llewellyn Davis derived scenarios – Tapping the Potential (1999)

varying characteristic parts of Welwyn Garden City (and other parts of the borough as relevant).

- f) The HELAA recognises that final dwelling capacities may vary once more detailed design considerations have been appropriately applied at the subsequent planning application stage³. In the context of Welwyn Garden City, relevant policies will include SP15 – *The Historic Environment of Welwyn Garden City*, which requires all development proposals, through their design and detailing, to demonstrate that they have responded to the key characteristics of the Garden City; and Policy SP9 – *Place Making and High Quality Design* which requires new development to respond to local character and context; and Policy SADM11 – *Amenity and Layout*.
- g) At the request of the Inspector, the Council has provided an additional Examination Document EX/69, which briefly sets out the delivery and density assumptions used for each of the sites proposed for allocation in the Plan.
- h) Specifically, for the nine ‘*other key sites*’ proposed for allocation in Welwyn Garden City (Policy SADM21), a summary of the matters taken into account when estimating dwelling capacity is set out in the table below. In accordance with Policy SADM21, proposals for all these sites will need to have regard to the site specific considerations set out in Table 9 of the Plan in addition to other relevant policies, objectives and material considerations.

Site	Location	Dwelling Capacity	Comments (g=gross density, n=net density)
HS1 (Pan01b)	Land at Bericot Way and Waterbeach	28	The estimated dwelling capacity represents a <i>baseline</i> urban density of 40dph (g/n) on a <i>small</i> site. A higher density was <u>not</u> considered appropriate for this urban site due to the adjacency of lower density housing and previous planning application history. Outline planning permission has recently been granted for 21 dwellings (a lower density of 30dph). The Council’s response to Q15 provides further detail on this site.
HS2 (WGC1)	Creswick	290	This site is currently located in the Green Belt. The estimated dwelling capacity represents a relatively low density of 20dph(g)/32dph(n), reflecting a number of constraints. The low density is appropriate to a site on the edge of the (extended) urban area and the interface with the Green Belt to the south. A modification has been proposed to Table 9 in response to a representation from Historic England. The Council’s response to Q16 provides further detail on this site.

³ paragraph 2.4.48 of the HELAA

Site	Location	Dwelling Capacity	Comments (g=gross density, n=net density)
HS3 (Pea08)	80 Bridge Road East	32	The estimated dwelling capacity represents a <i>high</i> urban density of 70dph (g/n) on a <i>small</i> site and reflects the site's relatively dense and commercial surroundings in this part of WGC. The site is currently in employment use (but not in an employment area) and is located between commercial and residential areas. Whilst a lower density scheme of 51 dph (flats and town houses) has recently completed to the east, site HS3 lies opposite a car dealership and diagonally opposite a retail warehouse at a road junction, and a slightly higher dwelling capacity could be achievable in this context.
HS4 (Hal03)	Railcliff Tail Lift site, Bessemer Road	110	The estimated dwelling capacity represents a <i>high</i> urban density on a <i>medium</i> sized site of 50dph(g)/71dph(n). The site is currently in employment use (but not in an employment area) and is located between commercial areas (to the southern radius) and residential areas (to the northern radius). Given the size of the site, the density estimate allows for open space provision.
HS5 (Hol19)	Hyde Valley House, Hyde Valley	17	The estimated dwelling capacity represents a <i>high</i> urban density on a <i>small</i> site of 70dph(g/n). Existing character is mixed, the site being located near a neighbourhood centre, community buildings, flats, houses and bungalows in an area punctuated by green spaces.
MUS1 (Han40)	Town centre North Site	98 (Proposed mod. amends this to 100)	The estimated dwelling capacity represents a density of 70dph(g)/19dph(n). This is a town centre site, the development of which will be guided by an adopted SPD. This ' <i>special case</i> ' estimated urban dwelling capacity recognises that the site will also deliver retail floor space. The dwelling capacity has already been subject to extensive consultation and master-planning.
HS6 (Han91)	Land at Gosling Sports Park, Stanborough Road	250	The estimated dwelling capacity represents a <i>baseline</i> urban density of 25dph(g)/40dph(n) on a <i>large</i> site. This relatively low density for an urban site reflects a number of constraints, and the interface with the adjoining conservation area. A modification to Table 9 has been proposed in response to a representation from Historic England: " <u>Development will need to preserve or enhance the character and appearance of the Conservation Area and its setting</u> ".

Site	Location	Dwelling Capacity	Comments (g=gross density, n=net density)
HS7 (Hal02)	Land at Waterside	20	The estimated dwelling capacity represents a <i>baseline</i> urban density of 40dph(g/n). The site is located on the edge of WGC with residential properties and a community use adjoining the site to the north and further residential development beyond to the north and west. The site is also adjacent to open space including parkland and leisure uses (in the Green Belt) to the east. Whilst commercial uses are present to the south, a denser form of development is not considered appropriate in this location given the tight relationship with dwellings to the north and the overall context of the site. The Council's response to Q20 expands further on this site.
HS8 (Pea24)	St Michael's House, Holwell Road	22	The estimated dwelling capacity represents a <i>medium</i> urban density of 52dph(g/n) on a small site, which lies in a residential area comprising a mix of flats and housing, with a primary school and playing fields to the west. Within this overall context, the estimated dwelling capacity is considered appropriate for this previously developed urban site in this part of WGC.

- i) In conclusion, the Council considers that the estimated dwelling capacities for the proposed '*other key housing sites*' in Welwyn Garden City are based on a robust evidence base which has taken account of the context of these sites and justifies the estimates in the Plan.
- j) It is recognised that once a planning application is received, dwelling capacities may change from these estimates (either up or down). Proposals may for example come forward for flatted schemes with very high densities, which may be appropriate in the most sustainable locations. At the planning application stage, detailed layout, design matters are taken into account as it is appropriate to do so at that stage. Nevertheless, the estimates in the Plan are considered to be reasonable, based on the methodology in the HELAA, which has taken into account site context.

HS1 Land at Bericot Way and Waterbeach

15) Is the suggested density for the development of this site consistent with the Garden City principles?

Welwyn Hatfield Response

- a) In the list of 'other key sites' Site HS1 is identified for residential development in the list of 'other key sites' in SADM21, with an estimated capacity of 28 dwellings.
- b) Dwelling capacities are justified by a proportionate evidence base to the Local Plan. The Housing and Economic Land Availability assessment 2016 (HELAA) (HOU/19) sets out the overall HELAA methodology including the approach adopted for assessing capacities on urban housing sites (paragraphs 2.6.13 to 2.6.18). As explained in response to Q13, the HELAA 2016 adopted a 'baseline scenario' as a starting point for all sites, with densities reducing as site sizes increased to provide for infrastructure and green space. Three additional scenarios for urban sites were devised based on the previous case studies – medium density (50dph), high density (70dph), and very high density (90dph) taking into account site context and size.
- c) HS1 (Pan01b) is part of a former reserve school site that the Local Education Authority has decided is too small for modern education needs. It has an indicative capacity of 28 dwellings in the HELAA, which is the baseline density of 40dph based on its size (0.70ha). The HELAA concludes that the baseline density is considered the highest that would be acceptable in this location, given the relatively low density of surrounding houses and previous planning application history¹.
- d) In response to the 2016 Submission Local Plan consultation, several representors raised concern that the proposed density is too high for the location. However, the Council consider that the 40dph baseline is a reasonable assumption in an urban area balancing the local context with the efficient use of land. This approach is considered consistent with the Garden City principles which promote high-quality, planned and integrated development. These principles are recognised as a basis for good planning in the Local Plan, but should not be used to simply replicate the low densities of the past.
- e) The HELAA recognises that final dwelling capacities may vary depending on the type and size of building proposed and taking into account more detailed design considerations at the subsequent planning application stage. In the context of Welwyn Garden City, relevant policies will include SP15 – *The Historic Environment of Welwyn Garden City*, which requires all development proposals, through their design and detailing, to demonstrate that they have responded to the key characteristics of the Garden City; and Policy SP9 – *Place Making and High Quality Design* which requires new development to respond to local character and context; and Policy SADM11 – *Amenity and Layout*.
- f) In this case, in January 2018 outline planning permission was granted for 21 dwellings at HS1 based on an illustrative layout characterised by detached, semi-

¹ A previous application for the adjoining site was refused in part due to overdevelopment. Subsequent to this refusal the land to the south has now been developed as a 75 bed care home.

detached and terraced dwellings, landscaping and SUDs. This indicates a slightly reduced site capacity than indicated in the Local Plan. However, this was an outline application and a future application with full details to be determined could include a different mix of housing type. This may result in a dwelling capacity closer to that estimated for the purposes of the Local Plan in the HELAA.

Policy SADM21 – Housing Allocations in Welwyn Garden City

Site HS2 Creswick

- 16) **Is the development of this amenity green space for housing fully justified and consistent with specific policy guidance in place to ensure that such proposals will preserve the relationship between the Garden City and the Green Belt?**

Welwyn Hatfield Response

- a) Site HS2 (WGC1) Creswick is one of the nine “*other key sites*” listed in Policy SADM21. It has an estimated dwelling capacity of 290 dwellings in the submitted Plan.
- b) **Amenity green space:** Other than the Green Belt, no land use designations apply to the proposed housing site. The site is well screened by vegetation and is formed of a series of arable fields with areas of ‘set-aside’. A public Right of Way (RoW) (nos. 66/68) crosses the eastern part of the site, cutting across the field parcel to the west of Hollybush Lane. The RoW would need to be retained in any development. Other informal pathways skirt the edges of fields and in some places, cross fields connecting to the residential area to the north. There would be scope within the development area to incorporate similar connections to the existing residential area, as indicated on the submitted masterplan (Dlpps2196).
- c) The site lies within Landscape Character Area (LCA) 45 (Welwyn Hatfield Landscape Character Area report, ENV/1). The report describes this large sweeping LCA as ‘urban fringe’ with a wide range of land uses including recreation, arable cultivation and mineral extraction. The proximity to large settlements is obvious by way of the main road transport network and the presence of land uses. Distinctive features in the landscape include pylons (HV power-lines and pylons run parallel to the southern boundary of the site). Visually, this LCA is described as “... *a rather bleak forgotten area ...*” that “... *lacks coherence ...*” and, “*on the southern edge of Welwyn Garden City ...*” has “...*lost any rural character*”.
- d) The site cannot be described as intrinsically beautiful, historically significant, tranquil or rich in wildlife. Its recreational value is mainly limited to the use of informal footpaths and a ROW and it is not considered to meet the criteria set out in paragraphs 76 or 77 of the NPPF on Local Green Space.
- e) The site promoter has indicated in their Reg.19 submission that the existing right of way will be maintained as part of the scheme and public access will be further enhanced by the creation of new grassland, informal and more formal recreation areas including a new cricket ground. This green infrastructure will be beneficial both to existing and new residents and will become part of the wider Strategic Green Corridor proposals.
- f) A **modification** to Table 9 is proposed as follows: ~~*easements of*~~ ***retain public rights of way and enhance public access to areas of recreation.***
- g) **Justified use for housing:** The site’s value as *amenity green space* is limited to a series of informal paths and a RoW which cuts across part of the site. The acute need for housing and the shortage of suitable, available and deliverable sites, justifies the allocation of this site in the Plan for housing. The site was assessed as

being suitable, available and achievable in the HELAA (HOU/19). In the Housing Sites Selection Background Paper (HOU/20 and 20a) it was noted the Sustainability Appraisal had assessed the site with three times as many significant positives as negatives, which was afforded significant weight in favour of the site.

- h) The site is located in an accessible location and a proposed minor modification to Table 9 will be consistent with the promoters stated objective of improving public access to areas of recreation.
- i) **Is development consistent with specific policy guidance in place to preserve the relationship between the Garden City and the Green Belt:** Land to the south of site HS2 (WGC1) Creswick, is to be retained in the Green Belt so that development will not encroach into the gap between Welwyn Garden City and Hatfield any further south than the existing overhead HV powerline and pylons, which already form a distinctive and detracting visual break in the landscape. The gap would not be any narrower than the existing gap between Welwyn Garden City and Hatfield, and the area of land to be retained within the Green Belt will contribute to wider green infrastructure objectives.
- j) Historic England has advised that whilst no adverse impact on designated heritage assets is likely to arise, as the southern edge of the site would form the new boundary of Welwyn Garden City with the Green Belt, careful consideration would need to be given to this edge condition as part of any development proposals. A **modification** to the plan is proposed to add a further bullet point to **Table 9** to this effect, stating that **'Careful consideration needs to be given to the boundary treatment with the Green Belt'**.
- k) In addition, the Council would highlight that other policies of the Plan will also be engaged during the master-planning and planning application processes, e.g. Policy SP15 – *The Historic Environment of Welwyn Garden City*, which requires all development proposals, through their design and detailing, to demonstrate that they have responded to the key characteristics of the Garden City. For development proposals of between 100 and 499 dwellings, applicants will need to demonstrate how consideration of the historic character and significance of the town has been taken into account at an early stage in the design process. Policy SP9 – *Place Making and High Quality Design* requires new development to respond to local character and context.
- l) Representation dlpps2196 has suggested an alternative Green Belt boundary, which would enable 1ha of land to be retained in the Green Belt whilst delivering 10 additional dwellings, based on the representor's submitted masterplan. However, it is noted that the submitted masterplan does not demonstrate a sufficiently wide buffer zone along the northern edge of the Wildlife Site. Whilst the Council agrees that a slightly higher capacity involving an additional 10 dwellings could be achieved, given the need to plan for a buffer to the adjacent Wildlife Site and clearance to HV power lines, it is considered appropriate to maintain the slightly larger site area proposed for allocation. This will provide for flexibility in layout, whilst responding sensitively to the wider landscape and any acknowledged constraints.
- m) A modification is proposed to increase the capacity of site HS2 (WGC1) to 300. This would increase the density slightly from a relatively low 20dph(g)/32dph(n), to 21

dph(g)/34dph(net). This is considered appropriate to a site that will be on the edge of the extended urban area with a direct interface to the Green Belt to the south.

- n) In conclusion, the Council considers that the allocation of this site is justified. The borough has an acute need for housing and for affordable housing. There is a shortage of a sufficient supply of suitable, available and deliverable sites within non-Green Belt locations to meet the assessed need for housing. The amenity value of this site is limited and in Green Belt terms, a suitable gap will be maintained between the two towns of Hatfield and Welwyn Garden City so as to avoid coalescence. Urban sprawl can be contained within a new urban boundary. The relatively low density envisaged will allow for a sympathetic treatment along the southern edge of the site and an appropriate layout design and which recognises the interface between the remaining area of Green Belt and an area of new development.

Policy SADM21 – Housing Allocations in Welwyn Garden City

Site: HS6 Land at Gosling Sports Park, Stanborough Road

- 17) In an era of increasing leisure time and sports participation how can the loss of sports facilities at this location be seen to be in accordance with National Policy at Section 8 of the National Planning Policy Framework?**
- 18) In the absence of any assessment for community requirements for dry skiing and golf driving within the evidence base, how is the loss of these sports/recreation facilities justified?**
- 19) What complementary proposals are in place to relocate the lost facilities, for which there is a community need, elsewhere?**

Welwyn Hatfield Response

- a) The council's response addresses these three questions together.
- b) Section 8 of the NPPF sets out that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Paragraph 70 sets out that to deliver social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
 - Plan positively for the provision and use of community facilities (such as sports venues) to enhance the sustainability of communities and residential environments
 - Guard against the unnecessary loss of valued facilities
 - Ensure that established facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community
- c) Paragraphs 73 and 74 provide specific guidance in respect of sport and recreation. Paragraph 73 sets out that access to high-quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. It provides that planning policies should be based on robust and up-to-date assessments of the needs for sport facilities. Paragraph 74 sets out that existing sports and recreational buildings and land should not be built on unless:
 - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss
- d) A key goal of the Plan is to enable communities to be successful by making sure that they are well served by a range of services and facilities. Gosling Sports Park is the borough's main indoor sports facility and also houses facilities for athletics, tennis and cycling as well as the dry ski slope and golf driving range.

- e) Gosling Sports Park is however in need of substantial investment. Many of the existing facilities are ageing and are understood to require major investment to meet current/future needs and expectations with a growing risk to the long term future of the whole sports park if such investment does not take place. Sport England is familiar with the situation at Gosling and has acknowledged in previous representations to the emerging Plan the need to raise finances to secure the future sustainability of the site.
- f) Gosling Sports Park has developed into a key sports hub over a period of 50 to 60 years. Rather than being delivered in a comprehensive, coordinated fashion, it has grown in a sporadic, unplanned way and consequently the spatial configuration is sub-optimal and the mix and distribution of uses present significant operational challenges.
- g) In accordance with paragraph 70 of the NPPF the Council has sought to plan positively for the future of Gosling Sports Park. The southern part of the site which comprises a dry ski slope and a golf driving range has a poor relationship with the main part of the sports park to the north and is under-utilised with low usage reported by the operator GLL. The Council has identified an opportunity to bring this land forward for development of approximately 250 homes. The sale of the land for housing will generate a significant capital receipt which in turn will enable substantial investment in the remainder of the Sports Park to deliver major improvements to the existing facilities and help ensure the facility is developed and modernised in a way that is sustainable, and retained for the benefit of the community. The principle of the proposal, a form of enabling development, is therefore fully consistent with Paragraph 70 of the NPPF.
- h) Sport England has raised an objection to the proposal on the basis that it is not consistent with Paragraphs 73 and 74 of the NPPF. Sports England is correct that the Council's existing Sports Facility Study (document reference OSC/3) does not assess the community's need for skiing or golf. Since the Plan was submitted the Council has commissioned a new sports facilities strategy that will include an assessment of needs for these facilities. When completed the study will inform whether these facilities need to be re-provided or whether they are surplus to requirements. The strategy will also consider the needs for other facilities at Gosling Sports Park and make recommendations for the future of these facilities.
- i) The new sports study and strategy is under preparation but the assessment of needs is unlikely to be completed during the examination as there will need to be consultation on its initial findings.
- j) It should be noted that there is no standard methodology relating to the assessment of community needs for skiing or golf. Need for these facilities at Gosling or indeed within the borough will therefore be a question of judgement having regard to a range of relevant factors and in consultation with key stakeholders including Sport England, National Governing Bodies and local clubs/users.
- k) There is a wide choice of golfing facilities in the borough and also nearby in surrounding boroughs. The golf driving range at Gosling Sports Park is one of seven golf related facilities in the borough, and one of four driving ranges. Three local ranges other than Gosling offer pay and play driving range facilities (Knebworth,

Wheathampstead and Mill Green). The driving range at Gosling is in need of investment and suffers from being disconnected from other facilities on the sports park e.g. changing rooms and toilets. It is considered to be a specialist facility which would be more sustainable under the management of a specialist operator or as part of a specialist golf complex.

- l) The dry ski slope at Gosling Sports Park is the only outdoor slope in Hertfordshire and one of only a handful in the region. The nearest outdoor slope which is currently open is located at Brentwood Park Ski and Snowboard Centre in Essex. There is another outdoor slope at Bassingbourn Snowsports Centre in South Cambridgeshire. The slope at Bassingbourn is currently closed but is expected to re-open in 2020. Based on the distribution of outdoor ski slopes it is clear that they meet a regional need. In the first instance therefore it is apparent that Gosling outdoor ski slope is not meeting a specific Welwyn Hatfield need. It is understood that the main user of the ski slope at Gosling Sports Park is the Bassingbourne Ski Club which has been required to relocate on a temporary basis. The operator of the Gosling Sports Park, GLL, has advised the Council that it doesn't think the ski slope works efficiently in operational terms.
- m) It is the case that most ski slopes form part of a dedicated ski/Snowsports complex. Gosling is not a dedicated facility which consequently poses major management challenges. In the same way as the driving range, the ski slope also lacks nearby infrastructure on site (changing rooms/toilets etc). It is also the case that the slope needs significant investment to ensure it remains fit for purpose.
- n) Having regard to the limited usage of the slope and the indication from Bassingbourn Ski Club that they wish to relocate back to their home when it re-opens it appears unlikely that the major required investment could be justified against the level of likely future use. Indeed the operator of Gosling Sports Park, GLL, has advised that they have no plan to invest in the ski slope given the low usage and its poor viability. It is considered that the outdoor ski slope is unlikely to be sustainable in the long-run and the Council considers there is limited evidence to justify that the facility is needed at Gosling or should be re-provided within the borough itself.
- o) In advance of the full assessment, the Council is therefore of the view that there is a strong case that the dry ski slope and golf driving do not need to be retained or re-provided, at Gosling or elsewhere within the borough. Nevertheless, the Council recognises that any future loss of facilities at Gosling will need to be fully justified at the application stage. A modification has therefore already been proposed to Table 9 – Site Specific considerations: Welwyn Garden City. With respect to the allocation of land at Gosling (site HS6) it is proposed to insert an additional bullet point under site specific consideration as follows:
 - **Any potential loss of sports facilities will need to be justified in accordance with Policy SADM7.**
- p) The above bullet point recognises the need to justify the loss of existing sports facilities on the site, and will ensure that any future planning decision involving loss of facilities is compliant with paragraphs 73 and 74 of the NPPF.

q) Having regard to the representations put forward by Sport England, the Council also proposes a further modification to Table 9 – Site Specific considerations: Welwyn Garden City. It is proposed to insert additional bullet points under site specific consideration as follows:

- A masterplan will be required to support the planning application, setting out how the development will support enhancements to the remainder of Gosling Sports Park and help sustain it for future use by the community;
- A positive relationship will be achieved between existing/new sports facilities and new residential uses having particular regard to potential noise and lighting issues.

r) The above modifications taken together will ensure that the concerns raised by Sport England are addressed.

HS7 (Hal02) Land at Waterside

20) Is the proposed development of this amenity green space for housing consistent with Policies SP11, SP12 and SADM 17?

Welwyn Hatfield Response

- a) Welwyn Hatfield has a relatively high provision of amenity green space, with 1.36ha of amenity green space per thousand population compared to other Hertfordshire authorities¹. This trend reflects the concentration of amenity green space in Welwyn Garden City and Hatfield, which is as a result of the masterplanning of the design of the two New Towns.
- b) The 2009 Assessment of Open Space was undertaken to assess the provision of open space, sport and recreational facilities in Welwyn Hatfield. The Assessment was based on the criteria and typologies set out in PPG 17 at the time which included 'amenity green space'. Local standards were set to assess the quantity, accessibility and quality of open space in the borough and surpluses, deficiencies and needs identified. Amenity Green Space was defined in the Assessment of Open Space, Outdoor Sport and Recreation 2009 (**OSC/2**) as:
- 'Amenity green spaces include village greens, landscaped green space in and around housing and informal recreation spaces. Given their size and nature they tend to have local catchments, providing opportunities for passive recreation (e.g. reading) and informal children's play for residents in close proximity. Amenity green spaces do not always need to be used for informal recreation purposes; they can also enhance the character or appearance of an area.'*
- c) HS7 was not identified as amenity green space as it was considered to be 'land left over from development' rather than forming part of the 'landscaped setting around the housing' and therefore did not meet the definition. The adjoining open space is, however, considered to form part of the landscaped space around the housing and was identified in the 2009 Assessment as Amenity Green Space AGS37 Sloansway/Mundells and is also designated as Urban Open Land UOL25 as it 'provides a physical green break between the industrial and residential areas of this part of the town and is linked by the cycle network to the Black Fan Valley Park, contributing to a wider green chain' and therefore meeting the criteria for designation as Urban Open Land, as set out in paragraph 12:19 of the Draft Local Plan 2016.
- d) The Assessment of Open Space concludes that amenity green space is accessible in most areas of Haldens ward and that the key deficiencies in Haldens are community outdoor sports facilities and provision for children and teenagers, which this area of open land does not provide. The Local Distance threshold for proximity to amenity green space used in the Assessment is 400m or around a 5 minute walk. There are 8 amenity green spaces located in the ward, and also a further 5 amenity green spaces readily accessible from Haldens within this distance.

¹ Assessment of Open Space, Outdoor Sport and Recreation 2009. At a local level, other local authorities in Hertfordshire which also produced PPG17 Open Space studies, have a lower provision of amenity green space. Dacorum has 0.90 ha of amenity green space per 1000 population, Stevenage has 1.09ha, Broxbourne has 0.45ha and East Hertfordshire has 0.55.

- e) The proposed development of this greenfield site for housing is consistent with Policy SP11, as this policy seeks the protection and enhancement of critical environmental assets commensurate with their status, significance and international, national and/or local importance. This area of open land is not of sufficient significance, status or local importance, particularly in the context of the availability of extensive green space immediately adjacent to this site in the form of the 15 hectare Black Fan Valley Park, to warrant designation as Urban Open Land.
- f) Policy SP12 Strategic Green Infrastructure refers to a network of multi-functional green spaces, capable of delivering a wide range of environmental and quality life benefits for local communities, as defined on page 52 of the NPPF. This area of green space has not been identified as forming part of this network and the loss of this area of open land is therefore consistent with Policy SP12.
- g) Policy SADM 17 Urban Open Land, refers to areas of Urban Open Land which are designated on the Policies Map and sets out the circumstances under which proposals for development within Urban Open Land will be supported. The policy states that new areas of open space created during the plan period which meet the criteria for designation (set out in paragraph 12:19 of the Local Plan) will be given the same level of protection as land designated as Urban Open Land on the Policies Map. The policy applies to existing areas designated as Urban Open Land and to newly created areas of open space which meet the criteria. This is an existing area of open space that was not identified for designation following the original survey of areas of Urban Open Land published in January 2001, or included as Urban Open Land in the further revisions published in November 2001 and December 2002.
- h) HS7 (Hal02) has long been envisaged for development and was included in the Deposit version of the current Welwyn Hatfield District Plan in 2001. The site was subsequently withdrawn as a housing site from the Welwyn Hatfield District Plan Revised Deposit Version June 2002 as at that time, the Council had an oversupply of housing land available in the borough and it was a greenfield site, not because it was found to be unsuitable. The land was subsequently identified as a potential housing site in the SHLAA Phase 1 (2010) **(HOU/1)**.