

Welwyn Hatfield Borough Council Local Plan Examination in Public 2018: Green Belt Study Stage 3

Representations prepared on behalf of Mariposa Limited and Homes England (formerly the Homes and Communities Agency)

Land to NE WGC

1.0 Introduction

- 1.1 This Statement responds to the Welwyn Hatfield Green Belt Study Stage 3 (August 2018).
- 1.2 Our clients, Mariposa Limited and Homes England (former Homes and Communities Agency), are the owners and promoters of Land to the North East of Welwyn Garden City (WGC4), Settlement Policy 18. Land within the ownership of Mariposa and Homes England falls within Green Belt Parcels P21b and P22 of the Green Belt Study.
- 1.3 We have reviewed and considered the Green Belt Study and provide our detailed comments below, in respect of Parcel P22 and its contribution to the five Green Belt purposes (paragraph 134, NPPF 2018).
- 1.4 In the first instance, the assessed Parcel 22 covers a larger area than the extent of land that would be likely to be developed, due to other constraints.

2.0 Purpose 1 ‘Checking the unrestricted sprawl of large built-up area’

- 2.1 The GBS states that site P22 has ‘limited or no contribution’ to Purpose 1. This is agreed.

3.0 Purpose 2 ‘Preventing the merging of neighbouring towns’

- 3.1 The GBS states that P22 has ‘partial contribution’ to Purpose 2. The detailed assessment states that the parcel lies indirectly between the settlements of Welwyn Garden City to the south and Stevenage to the north, approximately 6.6km of each other and approximately 3.7km between Welwyn Garden City and Hertford to the east. The report states that the “parcel extends beyond the urban edge of towards Hertford and makes a partial contribution to limiting the perception of merging of these settlements”.
- 3.2 We disagree with this assessment and do not consider that sensitive development on the land would harm the Green belt by way of merging these settlements. In this regard, it is noted that Parcel P20 is situated in a comparable location slightly west of P22. It is also noted that Parcel P20 is scored as ‘limited or no contribution’ to the Green Belt. The report states that Parcel P20 ‘is too contained by tree cover to make any significant contribution to the gap between the first tier settlements’. It is noted that Parcel P22 is similarly contained by tree cover which creates a natural boundary to the edge of the parcel and this can be enhanced through further planting.
- 3.3 It is also noted that Parcels P73, P74, P75 and P76 are situated in comparable locations between two Tier 1 towns but that they are scored as ‘limited or no contribution’ to the Green Belt.
- 3.4 The report states, under Parcel P73, that “the land plays a very limited role in maintaining separation between towns due to the significant distance between the Tier 1 towns” and for Parcel P75 that “there is significant distance between the settlements”. The report notes that “the settlements are located within approximately 4.5km of each other, at the closest point”, in comparison to 3.7km between Welwyn Garden City and Hertford. The distance over the

adjacent Parcels P73, P74, P75 and P76 is approximately 2.4km, in comparison to the 1.7km over Parcel P22.

- 3.5 On this basis, it is considered that Parcel P22 would have a lesser contribution (or no greater impact) than the merging of towns than Parcels P73, P74, P75 and P76. It is therefore proposed that P22 should be scored as 'limited or no contribution' in line with the comparable assessment for sites P19 and P20.

4.0 Purpose 3 'Safeguarding the countryside from encroachment'

- 4.1 The GBS states that P22 has 'significant contribution' to Purpose 3. The assessment acknowledges that the existing settlement edge of Panshanger is visible across the majority of P22 however states that the land contains "the characteristics of the open countryside and has limited urbanising development". The Inspector will note that the Parcel previously contained a grass runway with associated infrastructure including hard surfacing, hangars (now demolished) and café building (still in existence). Accordingly, whilst some of the northern most edges of the parcel could be considered open countryside (and land within P21a), land within P22 is perceived as the continuing edge of Panshanger and should be rated accordingly. In this regard it should also be considered that sensitive landscaping could mitigate or indeed enhance the current position.
- 4.2 Parcel P73 is situated in a comparable position to Parcel P22, with characteristics of open countryside and limited urbanising development. It is also noted that Parcel P73 has 'partial contribution' to safeguarding the countryside from encroachment. The report states that "the land plays a very limited role in maintaining the separation between towns as some development has already occurred to the south west of the A1000". This is comparable to Parcel P22, which adjoins development to the southwest at Panshanger and countryside to the north. It is noted that Parcel P73 is located to the north of the A1000 boundary, whereas Parcel P22 is contained by the natural boundary of the B1000.
- 4.3 It is considered that with contained development on part of this Parcel of land, that encroachment into the countryside could be safeguarded and, therefore, this should be rated as 'partial contribution' to Purpose 3.

5.0 Purpose 4 'Preserve the setting and special character of historic towns'

- 5.1 The GBS states that P22 has a 'partial contribution' to Purpose 4. The assessment states that "development encroaching on the valley would nonetheless be perceived as marking an expansion into a distinct landscape area that was conceived as forming part of Welwyn Garden City's wider rural setting". We disagree with this assessment.
- 5.2 The topography of P22 is such that development on the flat, former airfield land, before the land slopes down towards to Mimram valley, would not lead to encroachment on the valley nor lead to perceived expansion to the valley.
- 5.3 Parcel P17 is in a comparable location slightly to the north of Parcel P22. It is also noted that Parcel P17 is scored as 'limited or no contribution' to the Green Belt. The report states that 'the land forms little or no part of the setting of Welwyn Garden City'. The southern boundary of Parcel P17 is adjacent to Tewin Water Registered Park and Garden, which is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks

and Gardens by Historic England. Parcel P17 development would represent a similar expansion to Parcel P22 towards an area that forms part of Welwyn Garden City's wider setting.

5.4 Accordingly, we consider that P22 should be rated as 'limited or no contribution' to Purpose 4.

6.0 Purpose 5 'Assist the urban regeneration, by encouraging the recycling of derelict and other urban land'

6.1 In respect of Purpose 5, it is noted that LUC considered that all parcels of land within the GBS as making a 'significant contribution' to Purpose 5. It is well established that the Council have allocated all town centre, brownfield sites for development and therefore are required to explore development of sustainable green belt sites to help meet the objectively assessed housing need. In this regard, it is disproportionate to rate all sites with the maximum contribution.

7.0 Summary

7.1 In summary, it is acknowledged that the Council's consultant, LUC, has undertaken a detailed review of the Green Belt parcels.

7.2 However, Lichfields has reviewed the assessment of contribution to the Green Belt purposes and disagrees with the ratings applied to purposes 2, 3, 4 and 5. Overall, it is considered that, based on the above further assessment, Parcel P22 has a 'moderate to moderate-low release scenario'.