

Our ref: MA/STL5/L002

Your ref:



Date: 01 November 2019

Louise St John Howe
Programme Officer
re Welwyn Hatfield Local Plan
PO Services
PO Box 10965,
Sudbury
Suffolk
CO10 3BF

Dear Louise,

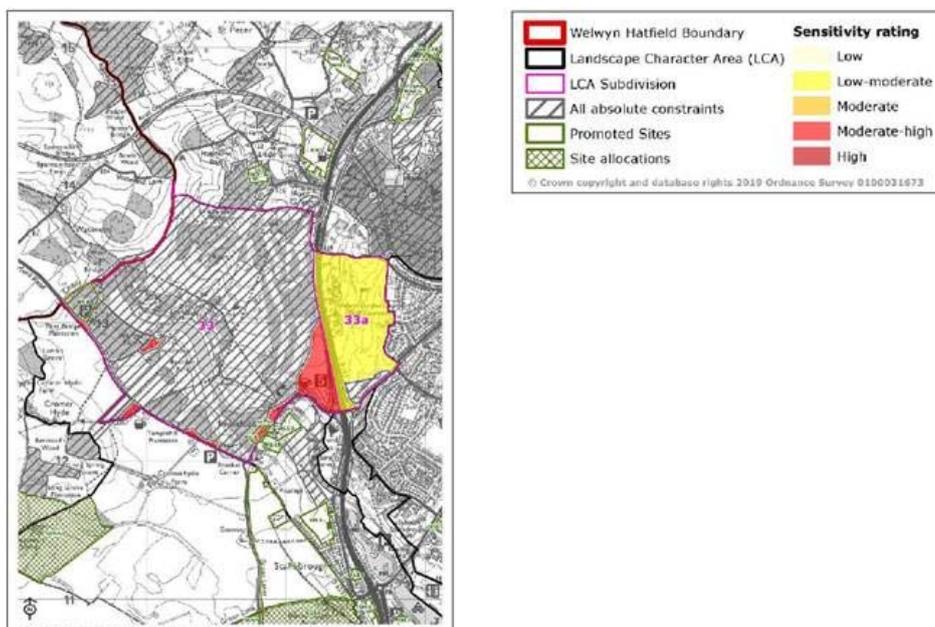
Site ID StL5- Lemsford Archery, Lemsford Village.

Consultation Response in respect of documents EX156 and EX160 and considerations re proposed release of site StL5 for residential-led uses

ATP is instructed by the Trustees of the Brocket Estate to respond to the consultation exercise identified by email on 06/10/19 in relation to a number of published Examination Documents. This response is specifically concerned with Examination Documents EX156 and EX160, insofar as they relate to this site.

[EX156: Landscape Sensitivity Assessment](#)

LUC's Landscape Sensitivity Assessment (July 2019) examines land north of Lemsford Village, Lemsford ("StL5" and "StL5a") as part of Landscape Character Area 33, 'Upper Lea Valley'. We would also note that the site lies extremely close to the boundaries of LCA65 and LCA45.



The Lemsford Archery site ("StL5"), adjoins Lemsford Village to the south and the Registered Park and Garden to the west. It is noted that the entirety of the promoted site ("StL5" and "StL5a") is identified alongside a much more open parcel of land to the north (close to junction 5 of the A1(M) and all designated "Moderate-High" sensitivity to residential development, which LUC justifies on the basis that:

*"Lemsford retains a historic character, with many listed buildings within the LCA, and has a distinct riverside setting alongside the Brocket Hall parkland. There is little open space within the LCA on the north side of the road through Lemsford, so sensitivity to residential development is **moderate-high**. The same rating applies to the field to the north which, although contained and affected by traffic noise from the A1(M), is visually prominent from the south with a strong distinction from Lemsford, for which it forms a backdrop."*

We are surprised that the LUC analysis seeks to include consideration of the open land parcel near junction 5 with the existing built form of Lemsford and the land to its immediate west which comprises StL5. Through the earlier LUC Green Belt Study (August 2018) the existing built form of Lemsford was considered under a number of scenarios (in respect of Green Belt release) and it was self-evident that the assessment of relative harm was very sensitive to boundary choices. The release of land necessary to inset the existing built form to the west of Lemsford Village was said to represent no more than Moderate harm.

Whilst we of course agree that Green Belt harm caused by inseting and landscape sensitivity are not necessarily aligned in each instance, we draw this parallel to show that areas around Lemsford demonstrate very different characteristics in terms of sensitivity to change.

We would however note that the analysis of site StL5 appears excessively cautious, especially given the opportunity for defensible development 'containment' offered by absolute constraints to the west of StL5 and the substantial boundary screening to Lemsford Village- please see image below.



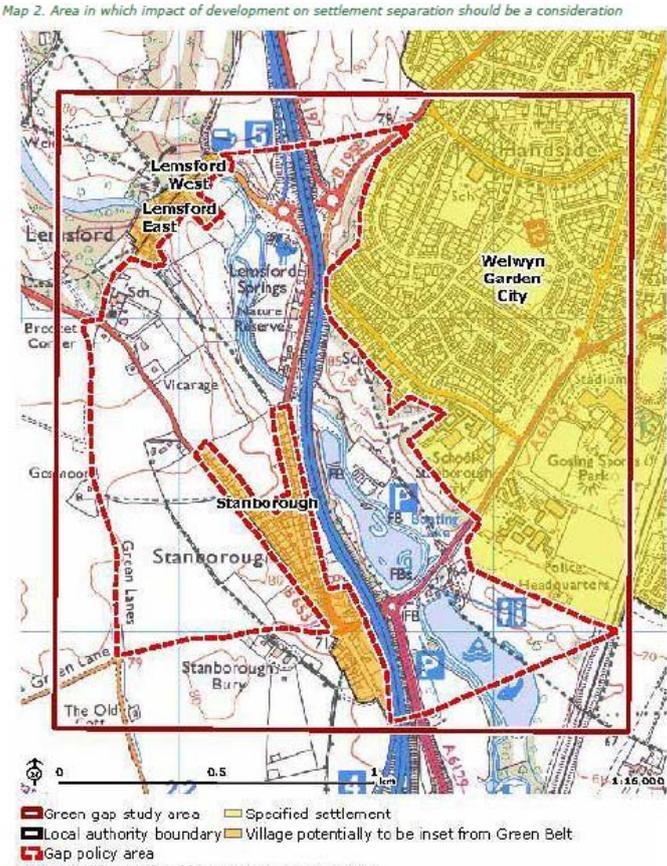
Whilst we do note that EX156 implies that the parcel on the north side of the road through Lemsford is sensitive, we would argue that the site is extremely well-screened and would confirm that the promoter is entirely committed to maintaining and strengthening this strong buffer to mitigate any perception of landscape harm in this respect.

We would therefore recommend that the LUC analysis of parcel LCA33 be reconsidered to provide a sub-parcel LCA33b which is solely comprised of the field to the north next to the A1(M) junction. This should also require reconsideration of the residual land within LCA33 that has greater reference to the previous conclusions about inseting existing built form and more contextual understanding that parcel StL5 has very strong screening to Lemsford Village and screening provided by an absolute constraint (therefore also providing permanence) on the far side.

The promoter is therefore compelled to **disagree** with the LUC analysis and rejects LUC’s conclusion that this area is as sensitive than the more exposed elements of the area currently shown as LCA33. We consider that this conclusion is reinforced by the defensible development ‘containment’ offered by the substantial hedgerow boundary to the roadside and absolute constraints to the west of StL5. The promoter is committed to maintaining the hedgerow and strengthening the boundary where appropriate and beneficial to do so. We would also point to the fact that it has been excluded from the proposed Green Gap Policy Area”.

EX160: Green Gap Assessment

Pages 83-88 of LUC’s Green Gap Assessment (August 2019) identifies a tile for consideration of a “policy gap area” to consider the relationship between the settlements of Welwyn Garden City, Lemsford and Stanborough. This initial tile analysis includes StL5. The Gap Policy Area which is identified uses the road of Lemsford Village as a boundary and by consequence StL5 does not fall within any recommended ‘policy gaps’, please see extracted plan below.



The policy approach outlined above clarifies that there would be no credible consequence of the release of the StL5 site in terms of safeguarding against the coalescence of Welwyn Garden City and Lemsford.

The Study goes on to confirm that the potential release of this site and other promotions close to Lemsford would expand the village but *"The sites would not affect the sense of separation between the villages and Welwyn Garden City."*

This conclusion is then restated within Table 4-3 which considers the potential effects of potential site allocations on settlement separation. In reality, it is therefore concluding that the potential for harm in relation to coalescence effects is very limited.

The promoter therefore **accepts** LUC's analysis.

Conclusion

The promoter is compelled to fundamentally **disagree** with the "Moderate-High" sensitivity rating assigned to StL5, Landscape Character Area 33. The land should be reconsidered separately from the much more open parcel to the north and with greater contextual understanding that the site benefits from strong screening to the roadside that will be maintained and strengthened to mitigate any small gaps as appropriate.

In addition, the promoter **accepts** the conclusions of LUC's Green Gap Assessment which confirms that there is no requirement to identify the site within any restraint area formed by a Green Gap Policy Area.

The promoter concludes that the release of StL5 could provide a sensible extension to the existing settlement which is recommended for inseting. Please feel free to contact me to clarify any matters raised above.

Yours sincerely

Mark Aylward

ATP

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