

Examination of the Welwyn Hatfield Local Plan 2013-32

Reg 19 (Submitted Sites)

Northern Settlements

Policy SADM 27 Site HS 15

Land East of London Road, Woolmer Green

Gladman and the Landowners of HS 15

Matter 4 – Green Belt



April 2020

Q32. Is the overall assessment of Moderate/High harm a sound interpretation of the contribution that this Site makes to the purposes of the Green Belt?

Q33. In that context, is the allocation of this site justified, effective, and consistent with national planning policy?

- 1.1 The Council's latest Green Belt Assessment is provided in Examination Document GB/05 and produced by LUC Consulting. GB/05 provides a thorough assessment of the Green Belt in Welwyn Hatfield, examining assessed parcels against the five purposes of the Green Belt as defined by Paragraph 80 of the NPPF, policies regarding Green Belt boundaries and Green Belt longevity contained within the NPPF (Paragraphs 83, 84, and 85), and with reference to wider guidance, case studies, and case law.
- 1.2 HS 15 forms part of Parcel P3 within the first stage of the Green Belt Assessment which is deemed to score "very high" in Green Belt functionality terms owing to the parcel being deemed as making a significant contribution to safeguarding the countryside from urban sprawl, and partial contribution to preventing the merging of neighbouring towns. Parcel P3 is however an extensive area of open land which relates to all undeveloped land located between the settlements of Woolmer Green and Knebworth. The overall findings made in this Stage 1 assessment therefore bare limited relevance to HS 15 which is much smaller and closely related to only Woolmer Green.
- 1.3 Sensibly in this case the Green Belt Assessment breaks down P3 into smaller sized areas through Stage 2 of the assessment. HS 15 is assessed through WGr1 (Parcel P3c) though this still doesn't reflect the boundaries of HS 15 which sits within and is smaller than WGr1. At Stage 2, the assessment concludes that whilst the parcel is open, opportunity exists to develop the south western part which is closely related to the urban edge of Woolmer Green. It also noted that the development of this land would not extend Woolmer Green further northwards and that a new boundary in this location would not represent a weakening of the Green Belt edge.
- 1.4 The proposed allocation at HS 15 is smaller than WGr1 with its boundaries defined to be responsive to the local context to respond to landscape considerations and to minimise effects on the green belt. The northern boundary does not extend as far as WGr1 ensuring that the development does not lead to the built-up area of Woolmer Green protruding any further towards Knebworth than the current boundary of the village. The boundary for HS 15 stops well short of the ridge line located to the north of the settlement between Woolmer Green and Knebworth therefore respecting the local pattern of development and minimising the visibility of the development from existing areas of Woolmer Green and Knebworth. This helps to limit any perception of sprawl or coalescence that the development might have otherwise caused with

Knebworth. The reduced area of HS 15 therefore helps to minimise effects on the Green Belt and secure a boundary to Woolmer Green and the Green Belt which is capable of enduring in the longer term (see NPPF Paragraphs 83 and 85).

1.5 The characteristics of HS 15 and requirements of Policy SADM 27 ensure that the harm caused to preventing coalescence of settlement and safeguarding the open countryside from urban sprawl associated with developing in this area is significantly reduced from the starting point set out in the Green Belt Appraisal for Parcel P3. This includes:

- HS 15 is well related to Woolmer Green with existing development located to the west and south of the Site.
- Only the proposed access road will be visible from London Road, the main route between Woolmer Green and Knebworth.
- Except for the proposed access, no development will take place further north than the existing built up extent of Woolmer Green. The proposed development will not therefore advance the built form of Woolmer Green any further northwards towards Knebworth resulting in a narrowing of the existing gap between these settlements.
- The boundaries of HS 15 stops well short of a ridge line located above Woolmer Green and between Knebworth. This helps to contain the site visually to a more limited area and means that the development will not be visible from Knebworth and most of Woolmer Green.
- The proposed landscape buffer required by Policy SADM will create a more robust edge to the settlement and strengthen the boundaries of the Green Belt in this location.
- The proposed landscape buffer will benefit the openness of the Green Belt, which in this location is currently adversely affected by highly prominent existing development.

1.6 These factors mean that the development would result in a much more moderate effect on Green Belt functionality than originally assessed through the Green Belt Assessment ensuring only a limited degree of harm. To gain a full understanding of the physical characteristics of the site and its relationship with the wider area, especially Woolmer Green and the existing gap to Knebworth we invite the Inspector to visit the Site during the course of the examination process.

1.7 The assessment of Green Belt functionality however forms only part of the factors to be considered through the site selection process. The Site Selection Paper (HOU/20a) and Sustainability Appraisal (SA/02) both confirm that the Site, on balance, provides for a highly

sustainable and suitable location for new housing, where the benefits of the development significantly outweigh its adverse effects. Gladman and the landowners of HS 15 are therefore confident that the allocation of HS 15 is justified, effective, and consistent with national planning policy.

Q34. Do exceptional circumstances exist to release this site from the Green Belt and if so, (other than Welwyn/Hatfield's housing need), what are they?

- 2.1 The significant housing need and pressure for housing within Welwyn Hatfield has already been concluded on a District wide basis as providing the exceptional circumstances required in national planning policy to justify the release of land from within the Green Belt. Policy SP3 confirms, the role that excluded villages, inclusive of Woolmer Green, has in meeting this housing need, and as such sites are needed in Woolmer Green are needed to meet the objectively assessed housing needs of the District in full.
- 2.2 The Site Selection Methodology Paper (HOU/20) shows that there is a need for between 160 and 172 dwellings in Woolmer Green for the plan period based on the assessed OAN of 664 to 707 dwellings per annum. The OAN for Welwyn Hatfield has however since been accepted to have increased to 800 dwelling per annum, with the local housing need figure for Welwyn Hatfield (applying 2019 NPPF) even higher at 875 dwellings per annum. Applying the Council's methodology for distributing housing need, Woolmer Green would be required to accommodate at least 195 dwellings to meet the assessed OAN of 800 dpa.
- 2.3 However, noting limited capacity for development elsewhere in Woolmer Green it is prudent to plan above this requirement for flexibility (in line with the Guildford High Court Judgment¹). This approach will both secure the deliverability of planned requirements and provide additional head room in supply to ensure that Green Belt boundaries defined in this Local Plan are capable of enduring beyond the plan period (see NPPF Paragraph 83) noting the further increase in housing need for the District based on Standard Methodology.
- 2.4 The approach outlined above is however based on a simplistic assessment of localised housing need based on an overall proportion of existing households and the Council acknowledge that this is not the only factor in deriving how the housing requirement should be distributed. There is need to consider how new homes might support existing facilities, services and employers.

¹ See Compton Parish Council & Ors vs Guildford Borough Council & Anor [2019] EWHC 3242 (Admin) (04 December 2019)

There is also a need to consider how settlements function collectively and consider plan wide issues such as infrastructure capacity and the need to secure the deliverability of the Local Plan.

2.5 Appendix F and G of the Council's 2016 HELAA (examination document HOU19) and 2019 Brownfield Register collectively illustrate that the availability of none-Green Belt land in Woolmer Green is in short supply with only the development at Entech House, allowed on appeal and now under construction for 72 dwellings, identified. The absence of reasonable alternatives means that the District Council is faced with a choice of meeting this need at other settlements or reviewing and allocating land within the Green Belt. The former would conflict with the spatial strategy defined in Policy SP3 and would fail to support the vitality and vibrancy of existing services located in Woolmer Green. Other settlements in Welwyn Hatfield are similarly constrained and further growth in these areas could adversely affect infrastructure capacity. The Council has opted to meet its housing needs in full review and release land from within the Green Belt at Woolmer Green. A decision supported by Gladman and the landowners of HS 15 and one which is fundamentally sound when looked at in the context of the NPPF.

2.6 Key benefits specific to the allocation and development of Site HS 15 include:

- The development of up to 150 new high-quality family dwellings inclusion of a range of housing types, sizes and tenures responsive to District wide and local housing need and demand.
- 35% of new homes provided on-site will be affordable housing. This will assist in a District-wide response to the significant affordable housing needs that the District faces, including providing opportunity for a new home for some of the 1,150 households recorded on the Council's housing waiting list.
- 20% of new homes built on-site will be built to lifetime home standard ensuring that the development is responsive to the housing needs of the elderly.
- The Site will deliver in the short term, assisting the Council in maintaining housing delivery and demonstrating a five-year supply of housing land consistent with the requirements of the NPPF.
- The location of the Site accords to sustainability criteria to promote access by non-car modes, being located within walking range to a wide range of existing services and facilities, accessible to local sources of employment, and well served by existing public transport services.

- New development will help support the vitality and vibrancy of existing services, facilities, and businesses located in both Woolmer Green and Knebworth.
- The proposed development will benefit with the setting of Woolmer Green creating a new boundary to the village from the north.
- The proposed development will reduce the urbanising effect of Woolmer Green on the landscape to the north and help safeguard the integrity of the existing gap between Woolmer Green and Knebworth.
- Buffer areas proposed to mitigate effects of the development on Payne Farmhouse and to provide for a more robust boundary to Woolmer Green will also provide opportunity for a net benefit for biodiversity to be achieved on the Site.
- New greenspaces available for recreational use accessible to the local community.
- Drainage provided through the Site's development will provide for a betterment in off-site flood risk.

2.7 Gladman and the landowners of HS 15 consider that these benefits add to the exceptional circumstances for the release of the Site from the Green Belt which is principally formed by the District-wide level housing needs. The benefits cited above, significantly outweigh the limited harm and adverse effects brought by developing the land for housing. It is considered that the necessary exceptional circumstances required by national planning policy therefore do exist for the release of this site from the Green Belt.

Q35. Does the Site infringe upon the existing gap in built development between Knebworth and Woolmer Green?

3.1 The Site is acknowledged to be formed of undeveloped land located between Knebworth and Woolmer Green. The proposed development would not however result in any further extension of Woolmer Green further north than existing development located in the village on London Road and as such would not act to close the existing gap between Woolmer Green and Knebworth. This is recognised and concluded by the Council in their Strategic Gap Assessment (See Examination Document EX160) which was consulted upon last year and the general conclusion reached that "all draft allocation sites could be accommodated without physical coalescence of settlements".

3.2 It is both Gladman's and the landowners of HS 15 view that the proposed development of HS 15 could serve to enhance the integrity of the gap between these settlements by strengthening the

boundary edge to Woolmer Green. The existing boundary to Woolmer Green in this location is weak with employment land and residential dwellings along this boundary highly visible to the wider open countryside resulting in an urbanising effect. The proposed development provides the opportunity for this boundary to be significantly strengthened through its naturalising reducing the existing urban influence without resulting in a narrowing of the current gap between settlements further northward than existing development on London Road.

Q36. Table 11 suggests the implementation of a landscape buffer along the northern boundary.

Q37. In the context of the Site boundaries on the proposals map, where is this buffer to be?

Q38. How wide is this buffer expected to be?

4.1 The proposed landscape buffer is proposed to be along the northern boundary of the proposed allocation outwith (but adjoined to) the proposed allocation itself. The extent of this buffer has yet to be defined although the current illustrative masterplan for the Site submitted at Reg 19 stage shows a boundary as wide as 50m, narrowing to between 8-13m at the Site access.

4.2 This boundary will be subject to refinement through the planning application stage in consultation with the Council, key stakeholders and the community. Whilst the buffer is outside of the proposed allocation, the land required for this buffer is with the ownership of the landowners of HS 15 and subject to the promotional area contracted by Gladman. As such, the buffer to the north of the Site is deliverable consistent with the requirements of Policy SADM 27 and could be secured in perpetuity and tied to the delivery of the development through a signed Section 106 agreement for any planning application to bring the Site forwards.

Q39. Once established, what impact would the landscape belt have on the openness of the Green Belt?

Q40. Is the proposed new boundary to urban development as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

5.1 It is considered that the proposed landscape belt will benefit Green Belt openness by removing the significant urbanising effect that the current boundary has upon the Green Belt. The current boundary of Woolmer Green is highly visible from the wider open countryside detracting from its rural character and sense of openness. The built form present in this location is not sensitive to its settlement edge location and is comprised of existing employment and three-storey apartments. This is shown by photomontages provided within Appendix 14 of the Stage 2 Landscape Sensitivity and Capacity Study (Examination Document ENV/09) in relation to WGr1.

- 5.2 The allocation and development of Site HS 15 provides the opportunity to secure a new boundary to Woolmer Green to the north, which will be in a naturalised state removing the urban influences that the current boundary has on the surrounding landscape. The boundary will provide for a robust and defined edge to Woolmer Green which is capable of enduring in the longer term and provide for a substantial edge to the northern boundary of Woolmer Green.