

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 5 - Sustainability



April 2020

Q27. Is Woolmer Green a sustainable location for development?

- 1.1 Woolmer Green is a sustainable location for development. The settlement features a large community centre, sports fields, play areas, a primary school, two public houses, a takeaway, veterinary surgery, a large café, allotments, and several employers. The village is served by a regular Bus service (the 300/301) providing a sustainable link to Knebworth, Hatfield, Welwyn Garden City, Stevenage, St Albans, and Hemel Hempstead. The sustainability of Woolmer Green is to be enhanced further by the construction of a convenience store.
- 1.2 Within walking distance of the Site is Knebworth which forms a higher order sustainable settlement located in neighbouring North Hertfordshire. Available services and facilities located in Knebworth include a doctor's surgery, dentist, library, supermarket, post office, pharmacy, as well as a small retail offer. There are also proposals for a new secondary school in Knebworth as part of the emerging Local Plan of North Hertfordshire (also at Examination in Public). Knebworth railway station is served by regular train services to London and Cambridge enabling access to a significant level of facilities, services, shops and sources of employment.
- 1.3 Footpath links provided between the Site and Knebworth along London Road and parallel to the East Coast Mainline means that accessing Knebworth and its services from the Site represents a feasible option. The accessibility of the Site to services and facilities available within both Woolmer Green and Knebworth helps to minimise the need to travel by car in line with national planning policy objectives. The accessibility of HS 15 to a large array of services and facilities is confirmed within the Council's SA (see examination document SA/6).
- 1.4 The sustainability of Woolmer Green and its suitability for residential development is rightly recognised within the spatial strategy of the submitted Local Plan. Woolmer Green is identified as a "small excluded village and settlement" within the settlement hierarchy of the Local Plan (the third tier of that hierarchy). Policy SP3 confirms that "the secondary focus for development (following the concentration of growth at Hatfield and Welwyn Garden City) will be in and around the excluded villages at a limited scale, compatible with the more limited range of job opportunities, shops, services, and other facilities available at these locations." The allocation of HS 15 through Policy SADM 27 is responsive to this context and is therefore consistent with the spatial strategy.

Q28. Are there opportunities for significant residential development within the existing settlement limits, thereby using brownfield land?

- 2.1 The Council has thoroughly assessed the capacity of its urban areas through its plan preparation process. This is evident through the iterations of its SHLAA that have been produced and submitted as part of the examination library (examination documents HOU/08 to HOU/12 and HOU/19), and further summarised through the Site Selection Paper (HOU/20) and the Housing Topic Paper (TPA/04). The latest of these, the 2016 HELAA (examination document HOU/19) confirms a highly limited capacity for further development the settlement boundaries of Woolmer Green. The 2019 Brownfield Register provides further evidence

of limited capacity in this regard with only the allowed development now under construction at Entech House identified.

Q29. What is the balance between local employment provision and economically active residents?

- 3.1 As submitted the proposed housing requirement of the Local Plan does not meet the full objectively assessed housing needs of the District, with an apparent 3,200-dwelling shortfall (based on Table 2 of the submission Local Plan). As confirmed in HOU/22, the implication of this shortfall means that population growth provided by the submission local plan is below that outlined by the 2014-based projections, with this shortfall resulting in the Local Plan providing fewer economically active workers than expected through the 2014-based projections. HOU/22 sets out that this is unlikely to be a problem in achieving the job requirements of the Local Plan as submitted.

Q30. Is the amount of employment land and the number of businesses in Woolmer Green disproportionate to the amount of housing, existing and proposed?

- 4.1 Historically a working village, the commercial base of Woolmer Green has been steadily eroded overtime as businesses left the village, restructured and closed, with former employment sites redeveloped for housing. The pressure on employment sites to redevelop for housing is still evident today, as seen with the recent redevelopment of Entech House, and proposed plan modification to use part of Site EA10 for housing. It is important to safeguard and support remaining viable employment sites located in the village from re-use in order to protect the economic role and functionality of the village.
- 4.2 Woolmer Green however does not sit in isolation and is well connected to nearby larger settlements which feature a wide variety of employment opportunities. This includes the settlements of Welwyn Garden City and Hatfield which are the District's two largest settlements, and both are accessible by bus and rail to HS 15 and Woolmer Green. Woolmer Green is also accessible to the north to Knebworth and Stevenage, the latter of which holds sub-regional importance for employment.
- 4.3 The need for new housing in Welwyn Hatfield is significant and must be met throughout the District in order to minimise effects on existing infrastructure and services, to enhance delivery through market choice, and to satisfy demand. The spatial strategy adopted by the Council through its submission Local Plan seeks to strike a balance between these issues, as well as accounting for environmental constraints in order to achieve a sustainable pattern of development.
- 4.4 It is not considered that the amount of housing proposed for Woolmer Green through the Local Plan is disproportionate. At submission, and taking into account existing commitments, a total of 226 dwellings will be delivered in Woolmer Green through the Local Plan period. This represents just under 2% of the proposed housing requirement, and therefore by no means represents an overallocation of growth relative to the settlement's position within the settlement hierarchy.

Q31. Has this site been appropriately assessed in the sustainability appraisal?

- 5.1 The SA is an iterative process and as such can alter over time as further new evidence becomes available and external influences change the assessment made. The Sustainability Appraisal follows a clear methodology adopting a standard assessment for each policy and site proposed. Conclusions made within the Sustainability Appraisal are clearly set out and supported with reference to the wider evidence base. The assessment made through the Sustainability Appraisal does however rely on planning judgement so it is inevitable that there will be a degree of disagreement about the outcome of the judgements made subject to links made to supporting evidence and the rationality of these judgements.
- 5.2 The assessment made for HS 15 is no different from other sites examined through this process with the same issues considered. The Sustainability Appraisal also examines reasonable alternatives concluding for what reason they do not form part of the Local Plan's proposals. The Sustainability Appraisal forms just one part of the site selection process, helping the Council to determine the contents of the Local Plan. It is nevertheless noted (and supported) that the SA scores the Site highly in terms of its locational sustainability and accessibility, supporting the delivery of housing need, and supporting local employers. Furthermore the SA does not take into account mitigation factors which will be brought about through the development of the Site which would reduce the assessed harm caused to the Green Belt, mitigate harm to Payne Farmhouse, and provide for betterment to Flood Risk.
- 5.3 Gladman's and the landowners of HS 15 concerns regarding the appropriateness of the SA stem from the references used to refer to the Site through its assessment. The SA refers to HS 15 as both HS 15 and WGr1 despite HS 15 covering a smaller area within WGr1. This difference is considered particularly relevant when examining how the Site responds to local distinctiveness and character in relation to landscape, and effects on the Green Belt where the boundaries of HS 15 respect the settlement form of Woolmer Green and avoid the ridgeline to the north which avoids perception of sprawl and coalescence. This clearly hasn't been taken into account through the SA given its reference to the WHBC Green Belt review which assesses only WGr1 and not HS 15. It is Gladman's and the landowners of HS 15 view that the differences between HS 15 and WGr1 are sufficiently material to result in a different outcome particularly in relation to these two sustainability measures. Whilst we consider the SA robust, clearly if HS 15 was reassessed to relate only to its boundaries it would only serve to underline the benefits of the Site and its suitability as an allocation.