

Examination of the Welwyn Hatfield Local Plan 2013 – 2032

Regulation 19 (submitted Sites)

Welham Green

Policy SADM 30, Site SDS 7 (WeG4b), Marshmoor

Statement:

On Behalf of North Mymms District Green Belt Society

By Jed Griffiths MA DipTP FRTPI

April 2020

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the North Mymms District Green Belt Society. It has been compiled in response to an invitation by the Examination Inspector to submit supporting material to be considered at the Stage 8 hearings. This statement addresses the matters, issues, and questions in respect of land at Marshmoor, to the east of Welham Green. The area was allocated in the Draft local Plan for a mixture of up to 40,500 square metres of B1 business use and 80 dwellings under Policy SADM 30, Site SDS 7 (WeG4b).
2. Earlier representations, objecting to the allocation, were made by the Society at the Regulation 19 stage. Where appropriate, reference will be made to the original statement of objection, and to representations made at earlier hearing sessions. The main purpose of this statement, however, is to focus on the issues and questions set out by the Inspector in the schedule published on 17th March 2020. In addition to comments on Site SDS 7, the statement will also respond to the issues and questions raised by the Inspector with regard to site HS 35 (GTLA01) at Foxes Lane, Dixons Hill Road.

Matter 1 – Environmental Considerations (Questions 31 – 39)

3. Much of the site lies within Flood Zone 2, and the Society has previously expressed concerns as to how surface water drainage would be managed. In the Strategic Flood Risk Assessment of January 2015, the Level 2 report contained a comprehensive of the whole Marshmoor area. The primary flood risk to the area was described as fluvial, from unnamed water courses in the northern and southern part of the area. For site SDS 7 (WeGr4b), the main risk would be from surface water flooding. A flood risk assessment should therefore be carried out.
4. With regards to foul water drainage, there have been questions about the capacity of the system in the Marshmoor area. In response to the Local Plan consultation of January 2015, Thames Water Property advised the Borough Council that the waste water capacity would be unable to support the demand anticipated by the proposed development on the site. Upgrades to the system were likely to be required and the developer should be required to prepare a detailed drainage strategy. Thames Water also expressed misgivings about the time it would take to deliver the necessary infrastructure.

5. The site is sandwiched between the A1000 Great North Road and the East Coast main railway, both of which are heavily used. Concerns about noise and air pollution are rightly identified by the Inspector, and have not been fully addressed either by the Council or by the site promoters. In its Regulation 19 submissions, the Society also referred to the potential loss of amenity to the existing residents along the A1000 and the Marshmoor Crescent Caravan Park.

Matter 2 – Infrastructure (Questions 40 – 46)

6. In terms of its location, the proposed development would be detached from the existing communities in South Hatfield and Welham Green. The residential element, of 80 dwellings, would be too small to support a range of public facilities and service on site. Inevitably, children would have to travel to schools elsewhere. For primary education, the nearest school would be in Welham Green, but this is already at capacity. The alternatives would be in South Hatfield. Secondary education is also provided mainly in Hatfield and in the Chancellors School at Brookmans Park.
7. Primary health care facilities would be found in South Hatfield or Welham Green; the latter in particular has limited capacity. Access mainly would be by private car.

Matter 3 – Sustainability (Questions 47 – 50)

8. Marshmoor is not attached to either Hatfield or Welham Green, and is not a sustainable location for the proposed development. Despite the proximity of the Welham Green railway station, research by WSP consultants found that 85% of workers at the Welham Green industrial estate travelled there by car, van, or motorcycle. For residents on the site, local shops and community facilities are in South Hatfield and Welham Green and are not within walking or cycling distance. Again, travel to and from these facilities would be mainly by private car. In its Regulation 19 submissions, the Society has drawn attention to the fact that the main access to the site would be from the A1000, which is already over-loaded at peak times. There would be severe conflict at the Dixons Hill roundabout to the south of the site, and on the narrow bridge over the railway in Dixons Hill Road.

Matter 4 – Green Belt (Questions 51 – 60)

9. As noted by the Inspector in the introduction to this matter, the National Planning Policy Framework (NPPF) states that Green Belt boundaries should only be altered in exceptional circumstances. In its Regulation 19 submissions and at other stages during the formulation of the Local Plan, the Society has been consistent in its objections to the removal of the site from the Green Belt.

10. Reference is made to the Stage 3 Green Belt Review, which considered that the overall harm to the Green Belt from the development of the site would be “moderate/low”. In commenting on the review, the Society disagreed with this assessment. The site occupies an important gap between the southern edge of Hatfield and Welham Green. In its Regulation 19 submission, the Society referred to a previous proposal to develop the area, promoted by a group called the Marshmoor Consortium. The scheme was advanced in connection with the Welwyn Hatfield District Plan Review 2001 but was rejected by the appointed Inspector following the Public Inquiry. Passages from the Inspector’s report are set out in the Society’s Regulation 19 statement – these give clear reasons for the rebuttal of the proposal on Green Belt grounds. In summary the Inspector stated that it “would increase the urban sprawl of Welham Green, reduce the openness of the Green Belt and encroach into the countryside.”
11. The above view contrasts with the assessment in the Stage 3 Green Belt Review and its harm rating of “moderate/low”. On examining the details in Appendix 6.1 of the study, it can be seen that Site SDS 7 is included in a large assessment parcel (P57) to the east of the railway line. At its southern end, the parcel includes land both to the north and south of Dixons Hill Road. Under the description of parcel P57, there is a further assessment (P57a), which combines P57 with P58 which is located further to the south. This is given a rating of “moderate/high”, because P58 “contains the characteristics of open countryside, comprising arable fields and paddocks, and contains no urbanising development.”
12. In the view of the Society, this description would also apply to at least the southern part of P57, which is bisected by Dixons Hill Road. Here the characteristics of open countryside are also apparent. Further to the north, the lower assessment rating of P57 is clearly influenced by the presence of some residential development and the Marshmoor Crescent Caravan Park, which are not part of Site SDS 7. Clearly, the level of harm ascribed to the whole of parcel P57 cannot be applied to the whole of the site.
13. The promoters of the site are proposing the development of a Life Sciences Park. At the Stage 6 hearings in December 2019, the Society questioned the need for this, particularly in view of the over-optimistic target for economic growth set out in Policy SP2 of the Draft Local Plan. To a large extent the Full Objectively Assessed Housing Need (OAN) is driven by this target, which assumes a net migration of workers into the Borough. No evidence has been provided to demonstrate that there is a need for research-based businesses in Welwyn Hatfield.

14. Since the publication of the Draft Local Plan, other circumstances have changed which cast further doubt on the economic growth assumptions for the Borough. First, there have been updates to the sub-national population projections published by the Office for National Statistics (ONS). The latest sets of figures, which are 2018-based, were released on 27th March 2020. Compared to the earlier 2014-based and 2016-based sets, these show a downward trend to the rate of increase in the population, which will undoubtedly be reflected in a reduction in forecasts for household formation rates, to be published in the autumn of 2020.
15. Second, the United Kingdom has now left the European Union, a process which has already led to a lower rate of economic in-migration. The ONS projections do not take account of the Brexit effects, but arguably the lower rate of in-migration will also lead to uncertainty over the performance of the local economy and labour demand and supply.
16. Third, the current coronavirus health crisis will change the focus from economic growth to economic recovery. Thus, there will be an emphasis on the revival of existing businesses, rather than the attraction of new enterprises. In these circumstances, the allocation of Marshmoor for the Life Sciences Park is neither justified nor effective.
17. Although the site was not included in the Green Gap Study 2019, the Society has argued that its development would occupy the important visual gap between South Hatfield, leading to the coalescence of the built-up areas. This point was emphasised by the Inspector examining the 2001 Local Plan Review – extracts from the Inspector’s report are set out in the Society’s Regulation 19 statement. In this context, it is important also to note the comments made by the Secretary of State for Communities and Local Government in refusing the planning for the waste incinerator at New Barnfield. In his view, the development “would substantially harm the openness the openness of the Green Belt and also harm the desirable perception of a gap between settlements in Hatfield and neighbouring Welham Green.”
18. The eastern edge of the site on the A1000 adjoins the boundary of Hatfield House, with its Grade I registered park and gardens. Arguably, The Marshmoor site forms an important landscape buffer between the park and the Welham Green. This view was endorsed by English Heritage (now Historic England), responding to the January 2015 consultation. Their response concluded that “WeGr4b could potentially have a negative effect on the registered park and garden of Hatfield House notwithstanding the presence of the A1000.”

19. Although development would not have a direct effect on the gap between Brookmans Park and Welham Green (Q58), it would have a harmful effect on the rural character of the A1000 Great North Road between Potters Bar and Hatfield. Although there are some places where roadside developments occur, the historic character of the highway, as a former coaching route, has remained intact. In its previous representations, the Society has expressed its concerns about ribbon development occurring along the route and the effect this would have on the integrity of the Green Belt.
20. The current Green Belt boundary is very strongly defined by the East Coast main railway line, beyond which to the west is the Travellers Lane industrial estate. This is a very firm and distinctive boundary, which protects the identity of Welham Green and the Green Belt gap between the village and the southern edge of Hatfield.

Policy SADM 30, Site HS 35 (GTLA01), Foxes Lane, Dixons Hill Road (Questions 61 – 66)

21. This is a 75% extension to the existing gypsy and traveller site which lies to the south of Dixons Hill Road. In its Regulation 19 statement, the Society has argued that the extension would encroach onto open countryside at the gateway to Welham Green from the A1000 roundabout. As pointed out above, the East Coast Main railway line is a very strong and defensible Green Belt boundary. For potential residents of the site, there would undoubtedly be problems of noise from the adjoining railway line.

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Hertford

10th April 2020