

**Examination of the Welwyn Hatfield Local Plan 2013 – 2032**

**Regulation 19 (submitted Sites)**

## **Welham Green**

**Policy SADM 26, Site HS 11 (Hat11), Land at South Way**

**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 relating to land at South Way, Welham Green. The site was allocated for housing in the Draft Local Plan 2016 under Policy SADM 26, as site HS 11 (Hat11).
2. Earlier representations, objecting to the policy, were made by the Society at the Regulation 19 stage. Where appropriate references will be made to the original statement of objection and to other representations made at earlier hearings. 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 17<sup>th</sup> March 2020.

## **Matter 1 – Sustainability (Questions 1 – 7)**

3. Although listed in the Local Plan as Welham Green, the site is located within the Parish of North Mymms. As pointed out by the Society in its previous representations, it is separated from the urban area of Hatfield by South Way, which forms a very strong and distinctive boundary. Because of this separation, the site does not fully satisfy the requirements of the National Planning Policy Framework (NPPF) on sustainable locations.
4. In terms of educational provision (Q1), the Society is aware of the County Council's position on the possibility of providing a new secondary school on its land at New Barnfield. For younger children, however, it would appear that they would need to travel to schools and nurseries. The junior school in Welham Green is currently at capacity, so the only choice would appear to be in the schools in South Hatfield.
5. There are no primary care medical facilities at the site. Patients would have to travel to use the doctor's surgeries at Welham Green or South Hatfield, which are at or near capacity. There is also a health clinic located in Hatfield Town Centre. Similarly, there are no local shops and community facilities on or near the site. There are limited facilities in the centre of Welham Green, but the nearest local shopping centre would be in South Hatfield.

6. Without substantial investment, access to the site would be difficult. There are no accessible bus routes and the nearest railway station is at Welham Green, more than a mile to the south. For cycling and walking, the site is not within easy distance of services and facilities. It is therefore likely that there would be a higher than average car dependency. The sustainability appraisal does not seem fully to address these issues. In the view of the Society (Q7), South Way is not a sustainable location for development.

### **Matter 2 – Environmental Considerations (Questions 8 – 12)**

7. The Society has studied the Level 1 and Level 2 Strategic Flood Risk Assessment. It would appear that there is no flood risk that would arise from the development of the site. The Society has no further observations on the questions, but has comments on other environmental issues under Matter 4 below.

### **Matter 3 – Infrastructure (Questions 13 – 20)**

8. In its response to Matter 1 above, the Society has pointed out that the site is not a sustainable location for development. In setting out the issues and questions, the Inspector clearly recognises the point that investment in infrastructure would be required to overcome the deficiencies.
9. The Council has acknowledged the view, made by the Society in its Regulation 19 submission, that major road works would be required on South Way in order to provide access to the site. No provision has been made in the Local Plan, but an additional access on South Way would reduce capacity on the local road network.
10. As pointed out by the Society in paragraphs 4 and 5 above, there are problems with capacity, both in local schools and primary care health services. Any additional capacity would need to be created in South Hatfield, as there is no realistic possibility in Welham Green.
11. With a dwelling capacity of 120 units, there is a question as whether the site would be sufficiently viable to provide the necessary infrastructure (Q21). In the Society's view, the provision of a local convenience store or any other community would be most unlikely. Even with the additional roadworks, the site would be isolated from both Hatfield and Welham Green, and its connectivity would be highly car-dependent.

#### **Matter 4 – Green Belt (Questions 22 – 29)**

12. It is recognised by the Inspector that the site is entirely within the Green Belt, where boundaries should only be altered in exceptional circumstances. Throughout the preparation of the Local Plan, at various stages of consultation, the Society has objected to the development of the site for housing. The Regulation 19 submission describes how, at the January 2015 consultation, the site was considered to be “unsuitable” by the Borough Council. Later, in December 2015, the Stage 2 Green Belt Study assessed the site as being “significant” in terms of Green Belt purposes. Despite this, and against officer advice, it was included in the Draft Local Plan in June 2016.
13. As noted by the Inspector, the Stage 3 Green Belt Review re-assessed the site as part of sub-parcel P56a, giving it a harm rating of “moderate/high”. The sub-parcel, however, included not only HS 11, but the site of the University of Hertfordshire “park-and-ride” facility at the western end of South Way. The sub-parcel itself, however, was part of a larger parcel (P56), which was given a rating of “high”. Despite this, it was not identified by the consultants as an area of “most essential” Green Belt. The Society strongly disagrees with this interpretation for the reasons which were set out originally in the Regulation 19 statement and are summarised below.
14. There is no doubt that South Way is very strong defensible Green Belt boundary between the southern edge of Hatfield and the countryside beyond. The officers’ report to the Council’s Cabinet on 13<sup>th</sup> June 2016 summarises the point very succinctly – “The site provides a very strong visual and physical barrier between the two settlements and development of this site would significantly reduce the gap between the settlements.” This view was reinforced by the landscape sensitivity assessment of the area, which stated that it provided strong edge to Hatfield and an open backdrop to Welham Green.
15. In the view of the Society, the site contributes to two very important purposes of the Green Belt. First, it is part of the strategic gap between Hatfield and Potters Bar, and, by its open nature it is helping to prevent coalescence between the two towns. More locally, as noted above, the site is part of the gap between South Hatfield and Welham Green. Its development would most certainly impinge severely on that existing space (Q25).

16. Second, development of the site would encroach on the area of open countryside to the south of the A1001. This area has been somewhat under-valued by the Council and its consultants. As the Society has pointed out in its Regulation 19 statement, the area is adjacent to a number of local wildlife sites, with protected species and ancient woodland. On the northern edge of the site, adjacent to South Way, there is a dedicated wildlife strip.
17. In the above context, it is clear that the allocation of the site is neither justified, nor effective, nor consistent with the NPPF. There are no exceptional circumstances which would support its release from the Green Belt. The Council have proposed remedial measures to mitigate the harmful effects of development, but these would not overcome the factors described above. South Way is a very strong and robust defensible boundary – to breach that line would severely compromise the open nature of the Green Belt to the south of Hatfield. It is significant that the Green Gap Assessment Report 2019 recommended that the whole of the area between Hatfield and Welham Green should be identified as a Green Gap Policy Area.
18. Promoters of the site have argued that a new Green Belt boundary could be established by a ridge line on the southern edge of the site. The Society has pointed out that this ridge is not a prominent feature in the landscape. The landscaping suggested by the promoters and by the Council overlooks the degree to which any development would compromise the openness of the Green Belt in this strategic location.
19. The Society has noted the representations from Hertfordshire County Council against the Policy SADM 34 in respect of New Barnfield (Q28). Although there are unused buildings on the land, it is an extensive area which does contribute to the Green Belt. Parts of it are covered by small woodlands. The objections to the development of HS 11 would apply with equal force to the removal of New Barnfield from the Green Belt. Proposals for the development of a waste incinerator were rejected on appeal and in the courts, partly on Green Belt grounds. The Society opposed the incinerator, and does not support the County Council's current arguments for changes to the Draft Local Plan. Together with HS 11, development of New Barnfield would clearly add to the urban sprawl between Hatfield and Welham Green.

**Matter 5 – Implementation (Question 30)**

20. The Society has no comments to make on this matter.

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Hertford

8<sup>th</sup> April 2020