

Examination of the Welwyn Hatfield Local Plan

Council's Statement - Stage 8 Hearing session

Southern Settlements

Settlement: Welham Green

Policy Number: SADM 30

Site References: SDS7 (WeG4b)

Matter numbers: 1-4

**Issues: Environmental Considerations,
Infrastructure, Sustainability, Green Belt.**

Question Numbers: Q31-60



Welham Green, Policy SADM 30, Site SDS7 (WeG4b), Marshmoor

Matter 1 – Environmental Considerations

- 31) How would the surface water at this site be managed?
- 32) Has a flood risk assessment been carried out?
- 33) Are there any on or off-site ramifications for flood risk that would result from the implementation of the proposed development?
- 34) Would the site's development require a balancing pond?
- 35) If so how extensive would this be and where would it be located?

For convenience and to avoid any duplication, the Council's responses to questions 31 – 35 are combined below.

Welwyn Hatfield Response

- a) This site has been assessed during both Strategic Flood Risk Assessments (SFRA) which have been commissioned by the Council (**ENV/13** and **ENV/13a**). The assessments show that the site is predominantly in Flood Zone 1. The 2016 SFRA (insert document reference) shows that 94.9% of the site is in Flood Zone 1, and concludes that development can be restricted to Flood Zone 1, or Flood Zones 1 and 2, meaning that the site passes the Sequential Test and that an Exception Test is not required.
- b) The results of the updated 2019 SFRA were very similar and required no significant change in approach. The Cravenia site (WeG19) was assessed separately in 2019 as it formed a separate standalone submission through the 2019 Call for Sites. This showed that 76% of the 0.62ha site was within Flood Zone 1, and 18% in Flood Zone 3b, and the assessment notes that "it is anticipated that proposed development will be sequentially located within Flood Zone 1, and notes that "developers should steer development away from the drainage channel and consider risk of the overland flow paths from the A1000. However, this is a relatively small part of the much larger overall Marshmoor site which is proposed for comprehensive development.
- c) The 2016 SFRA makes reference to another consideration on this site, namely surface water flood risk. Paragraph 12.2.3 (page 102) of the document notes that "the southern portion of the Marshmoor Area is shown to be severely impacted by surface water flood risk" and notes that "this particularly impacts the smaller specified sites which make up the development area". This concludes that surface water flood risk issues are identified and suggests that there are potentially issues on the site with blocked culverts.

- d) It is understood that this had been an issue on the southern part of the site for some time, and indeed this is referred to in the 2014 submission documentation prepared by the site owner, but work in recent years identified the problem as a blocked culvert either side of Dixons Road. Work was undertaken by Hertfordshire County Council as Local Lead Flood Management Authority to address this problem with the landowner and this is no longer considered to be an issue. This was consequently not referred to in the 2019 assessment.
- e) Policy SP23 contains five express limbs containing requirements relating to flood and surface water management issues for the site, and these are set out in points xiii to xvii of the policy. These cover the requirement for more detailed understanding of the flood risk of the site, the use of SuDS, a sequential approach to layout, reducing impact on third party land and new utility provision if necessary. These requirements would inform the Supplementary Planning Document (SPD) the policy also requires, along with a subsequent planning application.
- f) A drainage strategy was submitted by the land owner in 2014 and this identifies that the flood risk and surface water can be managed through a number of measures including swales, permeable paving and controlled discharge to existing watercourses. The Council is not aware of any requirement for a balancing pond.

36) How would foul drainage be dealt with?

37) Are there any foul drainage constraints that would impede the implementation of any development?

Welwyn Hatfield Response

- g) As part of the site assessment process, Thames Water were consulted on all submitted sites. In respect of this site, they identified that upgrades to the existing waste water infrastructure would be likely to be required before development commenced, and this is detailed in Appendix G of the 2016 Housing and Economic Lane Availability Assessment (**HOU/19**).
 - h) Thames Water's approach is that any necessary infrastructure upgrade works, either on-site or to the relevant pumping station, can be delivered if required but would be undertaken by means of the developer paying a standard infrastructure charge per dwelling or per unit of non-residential floorspace, which may be combined with other Thames Water funding as appropriate. Therefore this issue would not be a constraint on development but will require the developer to engage with Thames Water at the earliest opportunity, which the Council has consistently encouraged all developers to do.
- 38) Have the ramifications of noise pollution from the adjacent railway and primary road on the potential living conditions and working environment at this site**

been fully considered?

- 39) **Have the ramifications of air pollution, from the adjacent primary road, on the potential living conditions and working environment at this site been fully considered?**

Welwyn Hatfield Response

- a) All of the sites proposed for development in the submitted Local Plan have been subject to consultation with relevant bodies. In respect of noise and air quality issues, the consultation was with the Council's Environmental Health team, which confirmed that there was no issue with the principle of development, but that the presence of the road and railway line gave rise to potential impacts which would need consideration and detailed assessment as part of any planning application when more precise details of proposed development are known and potential mitigations can be proposed. The HELAA assessment for the site states that:
- “at planning application stage, noise and air quality surveys and reports would be required to demonstrate that appropriate mitigation measures can deliver commercial development with healthy internal and external environments that satisfy the requirements of the local planning authority. Conversely, any development proposals would need to be sited and designed to avoid or mitigate the impact upon the amenity of existing residential communities within the Marshmoor area”.*
- b) As well as requiring assessment, as the comment above proposes, Local Plan Policy SP23 requires any development on the site to take measures which would reduce any possible impacts.
- c) Point (vi) of the policy says that there should be a substantial set back of buildings from the A1000. This will help mitigate both heritage impacts and any potential impacts from the road. Further to this, point (vii) says that any development in the areas closest to the road should incorporate “high quality and extensive tree planting”. Whilst this is primarily to mitigate any potential heritage or landscape impacts and to ensure that the perception of separation between the site and Hatfield is maintained, it will also have an impact on mitigating any potential noise from the A1000, and has been factored into capacity assessments for the site.
- d) Further to this, and also picking up potential noise issues, point (xi) states that “The siting and design of development, including the use of landscaping and buffers, should support the mitigation of air and noise pollution arising from the railway and A1000 in order to minimise the need for mechanical ventilation within buildings”.
- e) As with the issue of surface water management, these principles would underpin and inform the SPD which will need to be developed for the site, and will inform future design of the development which would lead to a planning application.

- f) As well as the policy requirements, this issue has been identified by the landowner. In material prepared to promote the site, they have drawn up an indicative layout. This shows the residential development in the centre of the site behind the existing residential, with some of the employment elements between this and the railway line, which would provide screening from any noise. In addition, it can be seen on this indicative plan that both the proposed residential and the employment elements throughout the site are set back from both the road and the railway line.
- g) As can be seen, provisions to address potential noise impacts from both the A1000 and railway line are integral to Policy SP23 and would inform the Supplementary Planning Document for the site and any subsequent planning application(s), and are recognised by the landowner. Furthermore, it is expected that any applications would be accompanied by noise and air quality surveys in order to ensure that there were no unacceptable negative impacts on the development.

Matter 2 – Infrastructure

- 40) Has the impact of the proposal on local infrastructure been effectively considered?**
- 41) If so what are the outcomes?**
- 42) Where are the schools that children living on the development would attend?**
- 43) Is there sufficient capacity within the local schools to provide places for the children likely to be generated by the residential development, together with other proposals in the area?**
- 44) If not, what extra capacity is required and where would it be located?**
- 45) Is there sufficient capacity within local health services to meet the primary health care needs of the persons who would reside in the development?**
- 46) If not, what extra capacity is required and where would it be located?**

For convenience, and to reduce possible duplication, all of the questions in this section will be answered together.

Welwyn Hatfield Response:

- a) Yes, the proposals' impact on local infrastructure has been effectively considered. The Council's Housing Site Selection Background Paper 2016 (**HOU/20**) and the Draft Infrastructure Delivery Plan of 2017 (**INF/20**) considers any known infrastructure constraints on a settlement basis and the impact site allocations will have on infrastructure needs and delivery.

- b) Extensive work had been undertaken with Hertfordshire County Council as education authority throughout the preparation of the emerging Local Plan and corresponding Infrastructure Delivery Plan (IDP) and continues.
- c) It is considered that an additional 1FE is required for every 500 dwellings in an area, and the County Council regulation 19 representation (**dlpps 2156**) from October 2016 outlines the position of primary school education capacity for Welham Green. Paragraph 18.1 notes that there is a relationship between Welham Green and Brookmans Park and that the level of development proposed for both villages could be met by expanding Brookmans Park Primary School from 1.5FE to 2FE.
- d) Further to this, the Supplementary Education Statement under the Duty to Co-Operate from January 2017 sets out the position in Welham Green for both primary and secondary education. Paragraph 3.10 of the statement notes that there is considered to be some limited capacity at Welham St Marys Primary School in the village which could support growth, assuming that the current outflow to Brookman's Park Primary School continues.
- e) The statement notes that in respect of secondary education, children in the villages south of Hatfield – including Welham Green – predominantly seek places at Chancellors School in Brookmans Park, and that school could expand by 1FE, and this now has planning permission.
- f) Paragraph 1.10 sets out that the forecast cumulative increase in demand for secondary education from a number of villages in this area is 1.65FE, and that a combination of the expansion of Chancellors and “push back” to schools in Welwyn Garden City and Hatfield of children currently able to secure places at Chancellors would give an addition 2.5FE capacity in this area.
- g) As noted above, it is considered that an additional 1FE is required for every 500 dwellings in an area. However, as the proposed Marshmoor development is an employment-led mixed use scheme with 80 dwellings, it is unlikely to increase the demands on education provision in any significant way. The combination of this, the capacity within the primary school in the village and the means of addressing any additional demand for secondary education detailed above means that there is sufficient education capacity for the proposed development.
- h) Existing health care provision for residents at Welham Green is located between the village and Brookman's Park at the Potterills Surgery which serves both villages. There is an existing dental surgery in the village along with a pharmacist.
- i) The Infrastructure Delivery Plan (2017), (**INF/20**), explains that when planning for the delivery of health services, it is expected that the development of new housing in the borough will take place over the whole plan period, and the timing and phasing of such developments will need to be discussed with health providers as they are planned to agree the best way of ensuring that there are appropriate local primary health care resources in place to cope with the increased demand and in accordance

with Clinical Strategies. This additional capacity can be delivered in a number of ways and this will be taken forward in dialogue with health providers (para 7.26)

- j) As stated in the Council's Hearing Statement submitted in response to the Inspector's Issues and Questions for the Stage 3 hearing session (February 2018) both NHS England and the local Clinical Commissioning Group are aware of the likely pressure which services in the borough will face, but have yet to commit to a premises strategy or other spatial strategy for addressing them.
- k) In line with Section 8 of the NPPF (2012) Local Plan Policy SP13 states that the Council will continue to work with its partners to address existing deficiencies and secure appropriate levels of funding for necessary infrastructure. However, in the case of the proposed Marshmoor development in itself, it should be noted that as an employment-led mixed use development, the addition of 80 dwellings is unlikely to increase the demands on existing health infrastructure in any significant way.

Matter 3 – Sustainability

The Framework at Paragraph 5 says that the purpose of the planning system is to contribute to the achievement of sustainable development.

- 47) Is Marshmoor a sustainable location for development?
- 48) Has this site been appropriately assessed in the sustainability appraisal?
- 49) Where are the local shops and community facilities that residents of this site would mainly use?
- 50) How would residents get to them?

For convenience, and to reduce possible duplication, all of the questions in this section will be answered together.

Welwyn Hatfield Response:

- a) Marshmoor is located in the village of Welham Green. The village is a large excluded village, as set out in Policy SP3, and as paragraph 20.1 of the submitted Plan says:
 - a. *“the village has access to a wide range of services, facilities and public transport including access to rail services along the East Coast Main Line and Great Northern Route, and access to the A1000 to the east”.*
- b) The village has a well-established shopping parade with a range of units, a primary school and two pubs, a village hall, playing fields, allotments and community centre. In addition, a doctor’s surgery is located outside the village between Welham Green and Brookmans Park. It also has a good range of employment provision on the Travellers Lane Industrial Estate which is also accessible from the southern end of Hatfield by a footpath. There are also frequent bus and rail services to higher order centres including Welwyn Garden City and Hatfield. There are currently bus stops on Dixons Hill Road and on the A1000, and one access to the railway station is directly opposite Marshmoor Lane.
- c) The facilities that users of the proposed employment area would need to access include the local shops, pubs and transport links. These are located in the existing village, with the retail parade being approximately 600m from the junction of Dixons Hill Road and Marshmoor Lane, where it is envisaged that pedestrians and cyclists will access the site. To facilitate non-motorised links between the proposed site and the village centre, Policy SP23 sets out a series of principles, which would be developed upon in the Supplementary Planning Document (SPD) for the site which the policy requires.
- d) The Marshmoor site is assessed, along with all of those proposed for development through the submitted Local Plan, in the 2016 Sustainability Appraisal (**SUB/3**). The full assessment of this site can be found in Annex 1 of the 2016 SA Report, pages

415 to 420. The appraisal was carried out in a way that was consistent with all other site assessments, in line with the SA Framework and assumptions used for all site assessments (Table 4.1 (pages 29 to 33) and Appendix 2 of the 2016 SA Report). An assessment of Policy SADM 30, which allocates this site, is presented in paragraphs 6.377 to 6.389 of the 2016 SA Report.

- e) This considers a range of factors, rating them in a range from “Significant Positive” to “Significant Negative”. There are five significant positives, which come from ensuring the supply, location and quality of employment land; providing access to training, skills development and lifelong learning; delivering affordable housing; and from proximity to housing, employment and transport services. By contrast, there is only one significant negative, that of protecting and enhancing biodiversity, arising from the proximity of a Local Wildlife Site within the policy area and a second within 250m of the site. The SA highlights that this impact would be mitigated through Policy SP11 and paragraph (xii) of Policy SP23 which requires appropriate protection and where possible enhancement of identified wildlife sites and critical environmental assets that would be affected. It also rates as a “Minor Positive” the improvement in health inequalities given the proximity of a range of services within the village, all of which are within a 1400m straight line walking distance.
- f) The Sustainability Appraisal also identified the mitigation or measures in the policy where improvements could be made to further enhance the sustainability of the site. These include ensuring bus and rail transport improvements including bus stops and support for bus services which serve the Marshmoor area, along with improvements for pedestrians, wheelchair users and cyclists (Policy SP23 point (iii)). Given the type of employment which will be locating on the site, good quality access to the railway station is likely to be an important factor in attracting occupants, and this is particularly well located for the site, as there is access directly opposite the junction of Dixons Hill Road and Marshmoor Lane.
- g) Policy SP23 sets out that the SPD, which will inform development on the site, will comply with the following guidelines:
 - a. *iii. Proportionate provision or contribution towards improvement must be made for:*
 - b. *Accessibility and movement throughout the Marshmoor Policy Area*
 - c. *Connectivity for pedestrians and cyclists between the Marshmoor Policy Area and Welham Green Railway Station and village centre, as well as other destinations in the wider area that have a demonstrable relationship with the proposal, such as other town and neighbourhood centres, local primary schools and educational establishments; and*
 - d. *Rail and bus transport accessibility of the Marshmoor Policy Area and to support wider sustainable transport initiatives, including improved bus stop facilities and support for bus services that serve the Marshmoor Policy Area.*
- h) Improvements in this area are identified within Hertfordshire County Council’s draft South Central Growth and Transport Plan. Package 17 specifically looks at developing an active travel corridor between Hatfield, Welham Green, Brookmans

Park and Potters Bar, with Schemes 107 and 108 identifying accessibility improvements to Welham Green Railway Station and Welham Green to Hatfield cycleway improvements respectively.

- i) In addition to the facilities in the village which will be accessible for both residents and employees on the site, it is possible that given the size of the proposed employment, that a small amount of ancillary provision may be feasible on the site. Whilst not specifically detailed within the policy, it is possible that there would be demand for a small café or convenience store on the site, and this could have benefits in developing relationships and possible synergies between businesses locating on the site. Any such proposals would be considered against Policy SP5 and SADM5 so as to not adversely impact other existing outlets in the village centre or elsewhere.

- j) As can be seen, the site is located in a highly sustainable location and adjoins one of the borough's most sustainable settlements. The site is close to a range of services and facilities and sustainable forms of transport. Furthermore, sustainable movement within the site, and to the village, local facilities and wider transport network are key principles of the proposed development and will ensure that the sustainability of site is enhanced even further. Further provision, priority for users or measures to encourage sustainable movement could be addressed at the design stage or through Section 106 agreements.

Matter 4 - Green Belt

The National Planning Policy Framework stresses that the government attaches great importance to Green Belts and says that Green Belt boundaries should only be altered in exceptional circumstances.

The Council carried out a stage 3 Green Belt Review in 2018/19 in order to ascertain the contribution that a finer grain of sites, than were previously examined, around the urban fringes within the district, made to the different purposes of the Green Belt. In this assessment the overall harm at this site is considered to be Moderate/low and the parcel is not identified as an area of most essential Green Belt. In this context:

Question 51: Is the overall assessment of Moderate/Low harm a sound interpretation of the contribution that this site makes to the purposes of the Green Belt?

Welwyn Hatfield Response:

- a) Yes, the Council considers that the overall assessment of Moderate/Low harm is a sound interpretation of the contribution that this site makes to the purposes of the Green Belt
- b) The Council's assessment of the development parcel that includes the proposed allocation SADM 30 (SDS7 – **WeG4b**) is set out in the Green Belt Study Stage 3 (March 2019 – **EX99C**). The entirety of the proposal falls within parcel P57.
- c) The 2019 study identified different 'scenarios' in order to consider variations in harm within a parcel and within proposed site allocations. Where sub-parcels were identified that would lead to differing levels of harm these are set out in the report. In the case of parcel P57 there are no sub-parcels identified. However, one scenario is examined where parcel P57 is extended to the south, thus including additional land, which is identified as sub-parcel P57a.
- d) In this case, P57 matches the area to be removed from the Green Belt closely without the need to consider sub-parcels. The relative low level of potential Green Belt impact is a product of the site being well contained and containing urbanising development. The Green Belt Study Stage 3 (2019) states that the parcel 'is contained to the north and east by the A1000, Local Wildlife Sites and a Registered Park and Garden and to the west by the railway line'. Furthermore, that 'release of the site would not weaken the integrity of the surrounding Green Belt as it is well contained'

Question 52. Can this level of harm be appropriately applied to the entire site?

Welwyn Hatfield Response:

- a) Yes, the Council considers that the level of harm identified for Parcel P57 can be applied to the whole site.
- b) As explained in the Council's Response to Question 51, the methodology for the Green Belt Study Stage 3, was to identify 'scenarios' in order to consider variations in harm within a parcel and within proposed site allocations. Parcel P57 is extended to include consideration of one sub-parcel (P57a), however in this case, Parcel P57 closely matches the site in question except for the existing caravan park not being part of the proposals.
- c) As discussed in the Council's response to Question 51, it is the existing urbanising development and contained nature of the site that leads to the relatively low level of Green Belt harm being identified, which clearly applies to the whole site.

Question 53: In that context, is the allocation of this site justified, effective and consistent with national planning policy?

Welwyn Hatfield Response:

- a) Yes, the Council is confident the proposed allocation at Welham Green (SADM30, SDS7 – WeG4b) is justified, effective and consistent with national policy in accordance with NPPF (2012) paragraph 182. In particular:

Justified – the plan should be the most appropriate strategy, when considered against alternatives, based on proportionate evidence.

- b) The plan has been informed by a comprehensive suite of evidence and a detailed and iterative plan making process that has considered reasonable alternatives through the Council's Sustainability Appraisal process.

Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities.

- c) The Council considers that the site is deliverable within the first ten years of the plan period following plan adoption, in accordance with a cautious but realistic timetable.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- d) The proposal will make a valuable contribution to the borough's housing need at one of the borough's most sustainable settlements (Tier 3 – Large Excluded Village) in

accordance with the Settlement Hierarchy (**Policy SP3 – Settlement Strategy and Green Belt Boundaries**), which is a secondary focus for new development, following only the main towns, where compatible with the scale and character of the village and maintenance of Green Belt boundaries.

Question 54. If the Council is unable to meet its Full Objectively Assessed Housing Need through other Green belt releases, and given its positive jobs v economically active population balance, what exceptional circumstances justify the removal of this site from the Green Belt to provide land for even more jobs?

Welwyn Hatfield Response:

- a) Yes, the Council considers that exceptional circumstances exist to release the site from the Green Belt¹
- b) The site SADM 30 (SDS7 – WeG4b) is proposed to provide for housing (80 dwellings) in addition to employment (40,500m² of B1 use class).
- c) The Updated Site Selection Background Paper (2019) provides an updated position of proposed employment land vs. housing allocations and clearly demonstrates that against the lower end employment need projection there would still be a small shortfall of around 1.63 ha. On this basis, it is clear that the proposed employment allocations are important to ensure the plan makes provision for a sustainable balance between housing and employment and help to reduce the need for commuting, 'in' or 'out' of the borough.
- d) In terms of the wider exceptional circumstances case, this matter is addressed, in part, by the Council's Site Selection Background Paper (2016 – **HOU/20**), which considered exceptional circumstances on a site-by-site and borough wide basis.
- e) In terms of the wider exceptional circumstances case, this matter is addressed, in part, by the Council's Site Selection Background Paper (2016 – HOU20), which considered exceptional circumstances on a site-by-site and borough wide basis.
 - 1. Acuteness of the OAN
 - 2. Constraints on supply and land availability
 - 3. The consequent difficulties in achieving sustainable development without imposing on the Green Belt
 - 4. The nature and extent of the harm to the Green Belt if boundaries are reviewed.
- f) The Council's updated Site Selection Background Paper (2019) updates and

¹ The Council note that the plan is being examined under the 2012 Framework and that paragraph 83 of the 2012 Framework is relevant in this case rather than paragraph 136 from the 2019 Framework, as referred to in the Inspector's preamble. The Council note the distinctions between these two versions of the Framework.

complements the Council's exceptional circumstances case and included consideration for the fifth matter addressed by Calverton:

5. The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable extent.

- g) This matter has been considered on a site-by-site basis, as set out in the Site Templates (Appendix A of the Site Selection Background Paper 2019 – HOU20a) that takes into account the nature and extent of harm to the Green Belt.
- h) The site in question provides an opportunity to make a significant contribution to employment and housing at one of the borough's most sustainable settlements, that is close to an existing railway station and employment and that leads to a relatively low level of Green Belt impact and where the site already contains urbanising development and is highly contained. It is considered that the A1000 and Dixons Hill Road would provide very strong (robust and defensible) Green Belt boundaries.
- i) The Council's Updated Site Selection Background Paper (2019) also provides a summary of the consequences of not imposing on the Green Belt in Welwyn Hatfield Borough that contribute to the exceptional circumstances case for the plan as a whole, and that apply equally on a site-by-site basis. Whilst the proposal at the site in question is below the 'strategic' threshold, it would still make a significant contribution to meeting the borough's housing need. The consequences of not imposing on the Green Belt would mean the plan would fail to:
- Boost significantly the supply of housing for existing and future generations, for which an acute need exists,
 - Plan for or meet the full OAN or the identified requirement for employment provision,
 - Plan positively for economic growth, allowing for changes in the economy and businesses to remain, grow and locate in the borough,
 - Ensure there is a balance between housing and employment planned for in order to deliver sustainable development,
 - Adequately plan for and coordinate the delivery of infrastructure alongside growth (noting that larger allocations still make a valuable and proportional contribution to local infrastructure and where this site provides an opportunity to deliver employment provision essential to ensure a balanced supply of both housing and employment within the borough),
 - Support a sustainable pattern of development, consistent with the Spatial Strategy and Settlement Hierarchy (as advocated by the NPPF at Paragraph 84) where the Council's proposed approach does:
 - Channel development first towards the urban areas, particularly at the main town of Welwyn Garden City and Hatfield, and
 - Towards towns and villages inset within the Green Belt, particularly the larger and most sustainable villages such as Welwyn and Welham Green".

Question 55: Does the site impinge upon the existing gap in built development between Hatfield and Welham Green?

Welwyn Hatfield Response:

- a) The Green Belt Study Stage 3 (2019) makes it clear that the site makes a limited contribution to the separation of settlements due to existing development, including industrial development, at Welham Green that already leads to the perception of any gap being reduced. The existing urbanising development and containment of the site also minimizes any potential impact.

Question 56: Would the development of this site further the urban sprawl between Hatfield and Welham Green?

Welwyn Hatfield Response:

- a) No. For the reasons outlined in the Council's response to Question 55, the existing urbanising development, existing development at Welham Green and contained nature of the site limits any potential for impact. Overall, the site would lead to a relatively low level of Green Belt impact at one of the borough's most sustainable settlements.

Question 57: If so what, if any, remedial measures are proposed to mitigate the resulting harm?

Welwyn Hatfield Response:

- a) It is considered that any impact on the Green Belt from releasing this site is relatively low and that the site is highly contained with clear, robust and defensible boundaries. However, **Policy SP 23 – Marshmoor Policy Area – SDS7 (WeG4b) and Wider Area** includes a comprehensive range of requirements to enhance the landscape qualities of the site, including:
- 'Proposals will be required to adopt a high quality landscape-led approach to design, with significant planting of tree and shrub species that maintain and enhance a verdant setting across the Marshmoor Policy Area and enhance biodiversity'
 - 'Proposals will be expected to retain a substantial set back of buildings from the A1000 in order to help mitigate heritage impacts and noise and air pollution'
 - 'Proposals on land within close proximity to the A1000 will be required to incorporate high quality and extensive tree planting within those areas closest to the A1000 in order to help mitigate heritage impacts, improve the setting of Hatfield House Park and Garden, create and improve the general appearance of a countryside setting, and maintain the perceived separation between the Marshmoor Area and Hatfield when travelling along the A1000'.

- b) Given the clear and strong Green Belt boundaries provided by the A1000 and Dixons Hill Road it is considered that any further clarity is unnecessary.

Question 58. Does the site impinge upon the existing gap in built development between Brookman's Park and Welham Green?

Welwyn Hatfield Response:

- a) The proposed development will not extend further south than Dixon Hill Road and so the existing gap between Brookman's Park and Welham Green will be unaffected, where existing development at Welham Green already extends some way south of Dixon's Hill Road. Therefore the gap between these two settlements at the shortest distance is clearly unaffected by the proposal.

Question 59: If so what, if any, remedial measures are proposed to mitigate the resulting harm?

Welwyn Hatfield Response:

- a) Please refer to the Council's response to Question 57.

Question 60: 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?

Welwyn Hatfield Response:

- a) As explained by the Council's response to the preceding questions, particularly to Questions 52 and 54, the new Green Belt boundary will be formed of the A1000 and Dixons Hill Road that will provide very strong, robust and defensible boundaries. It is clear that the development would not weaken the integrity of the wider Green Belt particularly given its highly contained nature and the presence of existing urbanising and existing development.