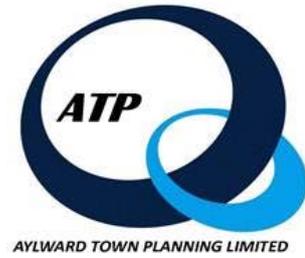


Our ref: MA/STL16/L002

Your ref:



Date: 01 November 2019

Louise St John Howe
Programme Officer
re Welwyn Hatfield Local Plan
PO Services
PO Box 10965,
Sudbury
Suffolk
CO10 3BF

Dear Louise,

Site ID StL16- Land east of Lemsford School, Lemsford Village.

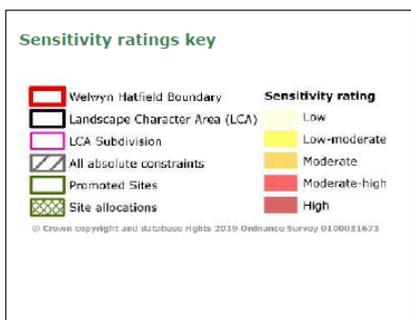
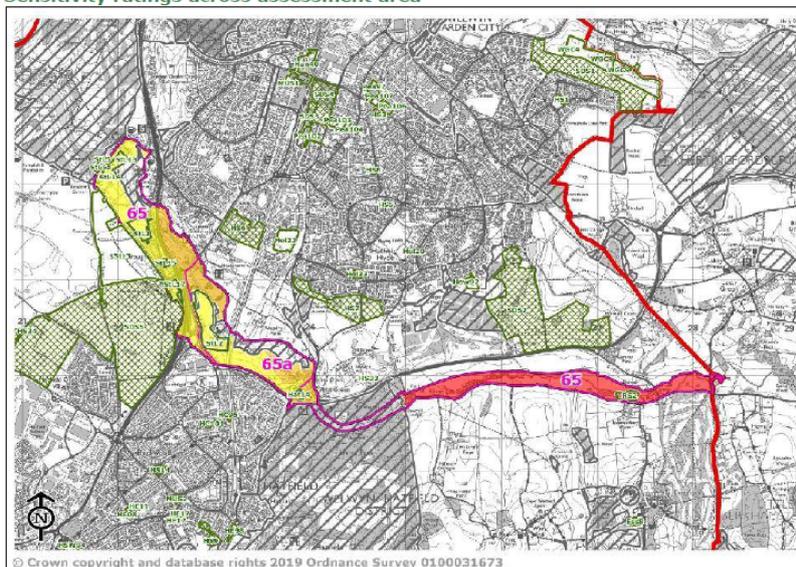
Consultation Response in respect of documents EX156 and EX160 and considerations re proposed release of site StL16 for residential-led uses

ATP is instructed by the Trustees of the Brocket Estate to respond to the consultation exercise identified by email on 06/10/19 in relation to a number of published Examination Documents. This response is specifically concerned with Examination Documents EX156 and EX160, insofar as they relate to this site.

[EX156: Landscape Sensitivity Assessment](#)

LUC's Landscape Sensitivity Assessment (July 2019) examines land to the east of Lemsford Village, Lemsford ("StL16") as part of Landscape Character Area 65, 'Middle Lea Valley West'. We would also note that the site lies extremely close to the boundaries of LCA33 and LCA45.

Landscape Character Area 65: Middle Lea Valley West **Sensitivity ratings across assessment area**



The subject land ("StL16") is adjacent to St John's School and takes access from Lemsford Village to the north-west. It is noted that the entirety of the promoted site ("StL16") would fall within the area identified by LUC within their analysis section described as "LCA65- Western part". The subject land falls west of the A1(M) and is designated as having "Low-Moderate" landscape sensitivity to residential development. LUC justify this conclusion on the basis that:

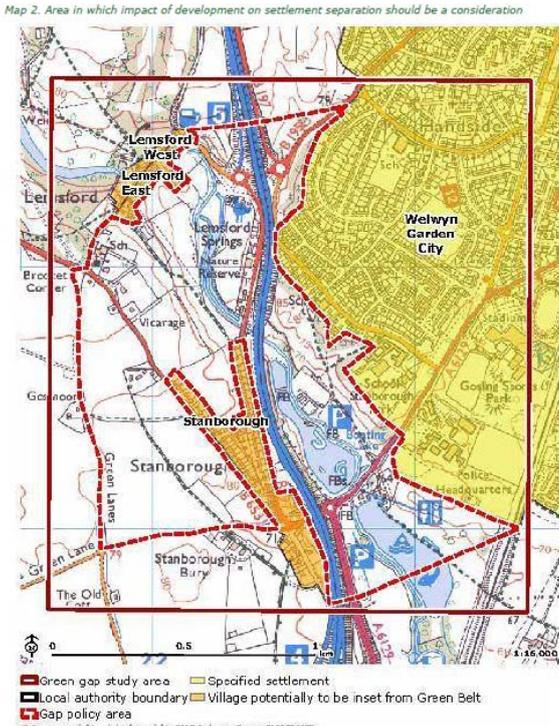
The western part of the area contains some valued features (the large area of purple moor grass and rush pasture, the deciduous woodland blocks that form a robust edge to the Lemsford Springs Nature Reserve and the public right of way crossing sloping landform through the centre of the area) and a sense of openness that allows for uninterrupted views towards woodland around Lemsford Springs. However the area is contained on all sides by roads and housing (most notably the A1(M) to the east and the housing development within Stanborough that provide strong urbanising elements and detract from the local landscape character), and a prominent presence of equine activities resulting in regular field divisions formed by fencing, meaning that there is a low-moderate sensitivity to residential development.

To the east of the A1(M), Stanborough Park has recreational amenity value which increases its sensitivity to moderate.

The promoter **agrees** with this analysis and supports LUC's conclusion that this area is less sensitive than the more exposed western elements of area LCA65.

EX160: Green Gap Assessment

Pages 83-88 of LUC's Green Gap Assessment (August 2019) identifies a tile for consideration of a "policy gap area" to consider the relationship between the settlements of Welwyn Garden City, Lemsford and Stanborough. This initial tile analysis includes StL16. The Gap Policy Area which is identified uses the road of Lemsford Village as a boundary and by consequence StL16 falls just within the recommended 'policy gap area', please see extracted plan below.



The policy approach to identify a Green Gap Policy Area is supported by the following statement:

"The gap between Welwyn Garden City and the two villages of Lemsford and Stanborough is occupied by the Lea Valley and the A1(M) corridor, and these features are likely to keep these settlements from merging.

Nevertheless, a gap policy area following the Lea Valley would ensure that the settlements remain separate. The case for keeping the land open is strengthened by the presence of priority habitats and local wildlife sites along the valley, the potential for biodiversity enhancement as part of Natural England's 'network enhancement zone', and the recreation function provided by the Country Park .

Lemsford and Stanborough currently retain separate identities, but the gap between them is vulnerable to erosion by ribbon development. A gap policy area between the two villages would help maintain their separate identities. The case for keeping the land open is strengthened by the area of archaeological significance and potential for biodiversity enhancement, forming part of Natural England's 'network enhancement zone'.

A gap policy area could be considered to occupy the area between all three settlements of Welwyn Garden City, Lemsford and Stanborough,"

However, when the Study goes on to consider the potential consequence of the release of the StL16 site (and other promoted sites) in terms of safeguarding against the coalescence of Welwyn Garden City and Lemsford it states that the potential release of this site and other promotions close to Lemsford would expand the village but *"Sites from the Council's 2019 'Call for Sites' (StL5, 13 and 16) would expand Lemsford, but not affect the sense of separation between Lemsford and Welwyn Garden City."*

We would conclude therefore that the identification of a Green Gap Policy Area appears fundamentally inconsistent with any perceived threat of the release of the promoted parcel for residential development. The promoter therefore **rejects** LUC's analysis, with reservations as outlined below.

The LUC Green Gap Study identifies constraints and opportunities (areas of archaeological significance and opportunity for biodiversity enhancement) which is suggested to reinforce the case for keeping the land open. The opportunity for development of site StL16 has been considered with reference to constraints and potential for betterment and the promoter is fully committed to ensuring that the scheme would optimise mitigation measures to deliver against both objectives.

For example, the proposal commits to the delivery of a buffer zone between any development and the woodland which serves as a habitat . We have also proposed that existing desire routes can be formalised and improved to improve walking choices between Lemsford and Stanborough.

Importantly, the promoter notes a fundamental contradiction in the justification for providing the 'policy gap' as a policy objective for the purposes of protecting the division between Lemsford and other identified settlements, while concluding later in the Assessment that *"Sites from the Council's 2019 'Call for Sites' (StL5, 13 and 16) would expand Lemsford, but not affect the sense of separation between Lemsford and Welwyn Garden City."*

While the promoter accepts that policy gaps are not intended or construed to altogether exclude or prohibit development, the potential release of those sites will not impact upon the sense of separation.

The fact that the potential release of StL16 is not identified as representing a material harm to the sense of separation (between settlements) reinforces the argument that the potential release of this individual site will represent no threat to the settlement pattern and will not lead to coalescence.

Conclusion

The promoter **agrees** with the "Low-Moderate" sensitivity rating assigned to StL16, which falls within Landscape Character Area 65.

Conversely, the promoter **rejects** the conclusions of LUC's Green Gap Study insofar as they relate to the mapping of the proposed policy area. We note that the written conclusion of the Green Gap Study is that the potential release of parcel StL16 will not affect the sense of separation between settlements. We agree with this conclusion and would therefore ask that the extent of the Green Gap Policy Area should be reconsidered to specifically exclude those parcels.

We conclude that StL16 is (at worst) fundamentally peripheral to the identified Green Gap Policy Area and more pragmatically should be excluded because the Study identifies that its release would have no effect upon the sense of separation. We would recommend that either the boundaries should be redrawn to exclude StL16 or that it be expressly recognised that its release (with appropriate screening) would not cause material harm.

Please feel free to contact me to clarify any matters raised above.

Yours sincerely

Mark Aylward

ATP

mark@aylwardplanning.co.uk

