

## Welwyn Hatfield Local Plan (2013-2031) Public Examination

### October 2019 consultation on new examination documents – Landscape Sensitivity Assessment

**On behalf of:** Aurora Properties (UK) Limited

**Date:** 4 November 2019

1. WHBC's Local Plan evidence base already includes three Landscape Sensitivity and Capacity Studies undertaken in October 2012 (ENV/5), October 2014 (ENV/9) and June 2016 (ENV/11).
2. Our client, Aurora Properties, and their consultant Liz Lake Associates undertook a very detailed comparison of the Council's Landscape Sensitivity Reports in 2016, which have been previously submitted to the examination and can be made available again at the Inspector's request. The previous comparison assessment was a substantial and robust document; it is inappropriate for landowners or Regulation 19 parties to redo this level of assessment again based on the new LUC Landscape Sensitivity study, which has been prepared using an entirely different methodology to the previous three studies in evidence at the examination.
3. It is therefore unclear why a major new Landscape Sensitivity Study was undertaken by LUC; we do not believe that this entirely new and conflicting assessment was requested by the Inspector.
4. A further technical note, prepared by Liz Lake Associates, accompanies this submission and considers a number of detailed matters within the LUC Assessment. There are a number of anomalies within the LUC assessment that should be addressed, these, inter alia, include:
  - The parcels used in the assessment are not necessarily logical; Area 54b is split into two parts, with part on the north and part on the south side of Brookmans Park. This complicates and confuses the assessment of two separate areas, which have entirely different topographical and landscape characteristics.
  - The assessment finds the land to the north of Brookmans Park (54b – north) to have a Low-Moderate or Moderate sensitivity. It considers that residential development to the east of the railway line is typically of moderate sensitivity, reducing to low-moderate at Bell Bar. However, it does not appear that LUC has taken into account the natural topography of the land, adjacent to the village, in this assessment.
  - Only one of the key sensitivities and mitigation for Area 54b relates to the northern part of the Area. LUC suggest that proposals should "*maintain and enhance connectivity between natural landscape elements, avoiding containment of sizeable areas, such as Brookmans Park Golf Course, by development.*" (p.216). This is the only reference to a specific potential housing location in the LUC report, and does not take account of the important compensatory improvements and landscape mitigation that would be provided as part of future development. It also fails to acknowledge that Brookmans Park Golf Course is not a "natural landscape"; it was originally within the grounds of The Brookmans Estate manor house, and is a manmade landscape that is already significantly contained by its own mature woodlands.

**Compensatory improvements**

5. In July 2019, MHCLG updated the Planning Practice Guidance to introduce specific compensatory improvements to offset the removal of land from the Green Belt. These are important considerations for the consultation on both the Landscape Sensitivity Document and the Green Gap Assessment.
6. These comprehensive improvements are set out in the accompanying Liz Lake Associates plan, and include:

Planning Practice Guidance example	Brookmans Park, BrP12 enhancement
<b>New or enhanced green infrastructure</b>	<ul style="list-style-type: none"> <li>• The extensive area of open grassland and isolated mature oak specimens will be retained and enhanced to create a diverse habitat of value and informal recreational space. A mosaic of new habitats will be created to optimise the wildlife value of the area.</li> <li>• The existing grassland would be enhanced to increase floristic diversity and promote complementary areas of damp and neutral / acidic grassland.</li> <li>• The majority of the existing grassland on the north and south of the Legg would be subject to an ongoing agricultural management regime including hay cropping and grazing, to optimise the botanical value of the grassland.</li> <li>• Planting within and around the proposed residential development area would include groups of native flowering and fruiting trees and shrubs of specific value to invertebrates, breeding birds and bats. These new habitats, along with retained / enhanced areas of grassland, would help to screen and sub-divide the development, to integrate it into the surrounding partially wooded landscape and to optimise ecological connectivity, through creating new green links and habitat of intrinsic value to a range of wildlife.</li> </ul>
<b>Woodland planting</b>	<ul style="list-style-type: none"> <li>• A programme of conservation management to Peplin’s Wood and The Legg will be implemented, connecting areas of ancient woodland and Local Wildlife Sites.</li> <li>• A phased programme of thinning and coppicing is proposed to enhance the species, age and structural diversity of the woodland and encourage the regeneration of a characteristic woodland flora. The existing inappropriate trees and shrubs (including poplar, sycamore and laurel) would be removed as would the fly tipping.</li> <li>• A 15m buffer strip will be provided adjacent to the ancient woodland within the development area managed to provide a linear woodland edge habitat including some native tree and shrub planting, to boost natural regeneration, within a mosaic of grassland communities. The resulting graded shrubby and tall grass / herb woodland edge will be of undoubted benefit to invertebrates, breeding birds, bats, other small mammals, herptiles and other wildlife.</li> </ul>
<b>Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal)</b>	<ul style="list-style-type: none"> <li>• A 15m buffer strip will be provided adjacent to the ancient woodland within the development area managed to provide a linear woodland edge habitat including some native tree and shrub planting, to boost natural regeneration, within a mosaic of grassland communities.</li> <li>• The hedgerows are to be reinforced to provide a substantial native tree belt linking the ancient woodland habitats to provide a valuable wildlife link for bats, great crested newts, reptiles and other protected and notable species, including a range of characteristic woodland birds.</li> </ul>
<b>Improvements to biodiversity, habitat</b>	<ul style="list-style-type: none"> <li>• Implement a programme of conservation management to Peplin’s Wood and The Legg, the connecting areas of ancient woodland and</li> </ul>

<b>Planning Practice Guidance example Brookmans Park, BrP12 enhancement</b>	
<b>connectivity and natural capital</b>	<p>Local Wildlife Sites.</p> <ul style="list-style-type: none"> <li>• Ponds located in the ancient woodland, which are currently heavily silted and of low ecological value, are to be restored to provide suitable open habitat for a range of aquatic flora and fauna, including great crested newts, which are found in nearby ponds.</li> <li>• The hedgerows are to be reinforced to provide a substantial native tree belt linking the ancient woodland habitats to provide a valuable wildlife link for bats, great crested newts, reptiles and other protected and notable species, including a range of characteristic woodland birds.</li> <li>• New ponds / SuDs to be created on the site. These would be specifically designed to optimise their potential for wildlife and would be planted with locally indigenous marginal and emergent aquatic plants, to encourage use by typical wetland insects, breeding birds and amphibians.</li> </ul>
<b>New or enhanced walking and cycle routes</b>	7. Public access would be permitted via new routes to be created in strategic parts of the woodland, these routes and proposed new glades would increase the diversity of habitats within the woodland.
<b>Improved access to new, enhanced or existing recreational and playing field provision</b>	<p>8. Community orchard to include traditional Hertfordshire varieties of apples and other fruit trees.</p> <p>9. Open spaces will be provided and made accessible to the public, enabling previously closed land to be used for recreation and leisure by local residents of Brookmans Park.</p>

10. The above mitigation and compensatory improvements through the release of BrP12 from the Green Belt have been highlighted previously, however the new Government guidance demonstrates the importance in policy-making authorities recognising these benefits and providing the framework for them to be delivered.
11. The assessment of future development sites to be released from the Green Belt should include consideration of such compensatory improvements.
12. In the light of the three existing Landscape Sensitivity reports which are all in evidence, prior to the submission of the Local Plan for examination, we can see no reason or merit in confusing the evidence base by allowing the submission of a new and contradictory Landscape Sensitivity assessment to the examination at this stage.

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