

Statement

Landscape sensitivity assessment & green gap assessment

Arlington Business Parks GP Limited/ Land west of Hatfield
(Hat 2)

30 October 2019

Introduction

1. This Statement is submitted in response to the additional documents uploaded to the Examination pages of the Welwyn Hatfield website and provides comments, as requested by the Inspector. This Statement particularly focuses on the Landscape Sensitivity Assessment ('LSA') and the Green Gap Assessment ('GGA') prepared by LUC on behalf of Welwyn Hatfield Borough Council ('WHBC').

Landscape sensitivity assessment

2. The LSA was commissioned by WHBC to inform decision making in relation to the additional site selection as part of the Local Plan review process. The assessment of the landscape sensitivity by character area provides a useful context to aid the detailed site assessments.
3. Land West of Hatfield (Hat 2) is identified to fall within the landscape character area known as '31: De Havilland Plain'. The De Havilland is a large character area and the site subsequently falls within its sub-area 31a (development on the edge of Hatfield). Table 3.1 of the LSA provides a summary of the overall landscape sensitivity ratings for each of the character areas and sub-areas and attaches at least one of five sensitivity ratings to them. The ratings are as follows:

Sensitivity	Definition
High	The landscape has strong character and qualities with notable features which are highly sensitive to change as a result of introducing built development.
Moderate-high	The landscape has some distinctive characteristics and valued qualities, with some sensitivity to change as a result of introducing built development.
Moderate	
Low-moderate	The landscape lacks distinct character and qualities and has few notable features, or is robust with regard to introducing built development.
Low	

4. The LSA concludes that sub-area 31a has a landscape sensitivity of low-moderate/moderate. Of the 54 landscape character areas assessed 17 of the areas are identified to have a landscape sensitivity that includes low and low-moderate. The remaining 37 landscape character areas are identified to range from moderate/moderate-high and high sensitivity. Hat 2 therefore, falls within a character area that is identified to have less landscape sensitivity than 68% of the character areas in Welwyn Hatfield.
5. Appendix 1 of the LSA provides a detailed assessment of each landscape character area. With regards to sub-area 31a, the assessment outlines that the northern part of 31a has visible urban influences, particularly Hatfield Business Park, and traffic diminishes the landscape character. With regards to the Ellenbrook Fields element, the assessment outlines that although influenced by urban fringe, the area does have strong natural character associated with parkland vegetation and adjacent woodlands and has recreational value with some heritage interest. As a result, the assessment concludes that sub-area 31a has a low-

moderate landscape sensitivity to the north and a moderate landscape sensitivity to the south.

6. As a result of the findings, the LSA makes a number of recommendations that development proposals should provide to mitigate the impact on the landscape sensitivity of the De Havilland Plain (sub-area 31a). These include:
 - *“Limit development within visually prominent areas that have an open character;*
 - *Preserve the extensive public access enjoyed in the area; and*
 - *Preserve BAP Priority Habitat deciduous woodland as well as other small copses.”*
7. The findings of the LSA on the sensitivity of sub-area 31a (De Havilland Plain) are agreed and supported. In addition, the recommendations set out in the LSA in relation to how forthcoming development can mitigate any impact on the sensitivity of this landscape character area are broadly accepted. However, the preservation of the public access is not supported as there is opportunities to provide enhancements rather than simply preserving, as discussed further below.
8. The Inspector will note that an outline application (ref: 6/2018/2768/Outline) is currently in the process of being determined for the development of land west of Hatfield (Hat 2) and the above mitigation measures have already been accommodated. Indeed, it will be noted from the Landscape Visual Impact Assessment chapter of the submitted Environment Statement that any impacts on Ellenbrook Fields itself will be in part mitigated by the Proposed Development, *“which will create a series of three well defined neighbourhoods that sit within a strong Green Infrastructure framework”*. The LVIA goes on to set out that beyond Ellenbrook Fields, the effects rapidly reduce to slight-negligible impact, and there are unlikely to be any discernible effects on the wider character of the De Havilland Plain. Furthermore, the LVIA concludes that the effects of the proposed development are well contained and limited to a small number of receptors within and immediately adjacent to the site.
9. In addition to the above, the proposal will include enhanced proposals for Ellenbrook Fields that will meet many of the essential and desired criteria for Country Parks, including a larger area of new woodland; ecological connectivity between woodland to the west and wetland habitats; more diverse range of recreational and sporting activities; creating a new and valuable stream habitat and providing real opportunities for open access and recreation including the provision of parking. Consequently, it is demonstrated that a development on land to the west of Hatfield can be sensitively designed to respond to local context, notably landscape character.

Green gap assessment

10. The GGA has been produced to inform the location of site allocations, as well as to inform potential future policies of gaps to maintain the separation of settlements. As a result, the GGA has undertaken a review of the identified ‘green gaps’ in Welwyn Hatfield. Hat 2 is identified to fall within the gap area known as ‘area between Hatfield and St Albans’.
11. The GGA identifies the gap between Hatfield and St Albans to be a large gap that exceeds a distance of 3km in places, with the smallest gap being 1.3km along Hatfield Road. The GGA goes on to set out that the *“two settlements retain separate identities and the presence of Ellenbrook Fields country park, blocks of woodland and undeveloped slopes are strong*

features that ensures there is a perception of leaving one settlement and travelling to another when using the roads and footpaths between the two. The two settlements are not currently inter-visible with each other”.

12. Notwithstanding the above, the GGA goes on to conclude that *“since the gap between Smallford (St Albans) and Hatfield is currently quite small and vulnerable to future development, it would be appropriate to identify a gap policy area within Welwyn Hatfield’s part of the gap in order to help prevent the future merging of Hatfield with St Albans”.*
13. The above conclusion contained within the GGA is not agreed and considered to be a flawed recommendation. The GGA makes this recommendation on the basis that the gap between St Albans and Hatfield is currently quite small and as a result, it would be appropriate to identify a gap policy area within the Welwyn Hatfield part of the gap to prevent future merging between Hatfield and St Albans. However, as the GGA confirms in its assessment, the gap is large and for the most part, measures approximately 3km wide. Furthermore, the GGA confirms that there are a number of features between the two settlements, such as the large expanse of woodland, which prevents the settlements from being inter-visible and coalescence from being possible.
14. It is therefore, erroneous to recommend a gap policy area that covers the whole western area of Hatfield, which would subsequently restrict any future development coming forward to assist meeting the housing need of the Borough in this area on the basis that the ‘smallest’ element of the gap between Smallford and Hatfield is 1.3km. Indeed, as clearly evidenced by the Masterplan submitted as part of the outline planning application for the development on land west of Hatfield (Hat 2), there will be no coalescence between Hatfield and St Albans. To the contrary, the Masterplan demonstrates that the development of Hat 2 would not encroach any closer than the smallest existing gap between St Albans and Hatfield. As a result, a gap with a clear physical and visual separation will be maintained. On this basis, there is no justification for identifying the whole area between Hatfield and St Albans as a gap policy area. Instead, the Masterplan demonstrates that the land beyond the proposed development site to the west, including Ellenbrook Country Park and the 1.3km gap between Smallford and Hatfield, could benefit from a gap policy.