

Our ref: MA/SB1/L003

Your ref:



Date: 31 October 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 SB1- Swanley Park, Swanley Bar Lane.

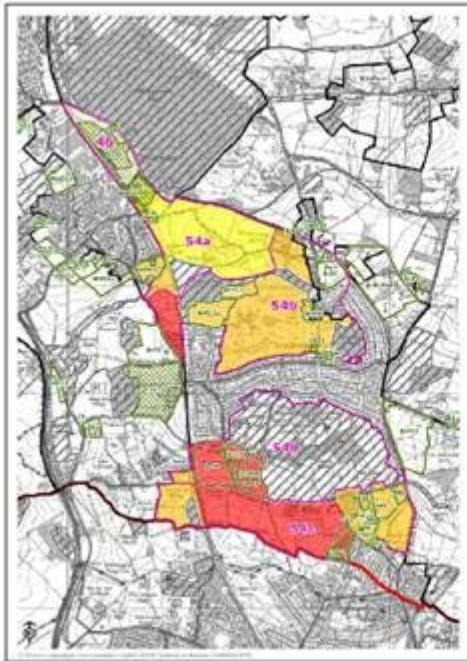
Consultation Response in respect of documents EX156 and EX160 and considerations re proposed release of site SB1 for residential-led uses

ATP is instructed by the promoter (King & Co) 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](#)

Land south of Swanley Bar Lane, Swanley Bar ("SB1", incorporating "SB1a" and "SB1b"), was initially promoted through the Housing and Economic Land Availability Assessment ("HELAA 2016") and reviewed as site "LHe3". On re-submission, the promoter opted to present three 'development scenarios' comprising 7.8ha, 2.57ha and 1.0ha respectively in recognition that Welwyn Hatfield Borough Council would be seeking flexible land configurations to minimise adverse impact upon the Green Belt. It was anticipated that three development 'scenarios' would also encourage a more granular examination of possible harm and landscape sensitivities therein.

It is clear from LUC's Landscape Sensitivity Assessment (July 2019), Landscape Character Area 54, that LUC have achieved a stronger degree of granularity than in previous supporting documentation. Landscape Character Area 54, or 'Potters Bar Parkland' is subdivided into three 'sub-areas' that are individually examined, including 54c, 'sensitivity to development on the edge of Little Heath'. Insofar as we had contemplated that the scenarios of SB1 would be assessed independently of one another, we **support** LUC's conclusions that *'the more contained fields to the east and south of Swanley Bar have a closer association with built development...and have a weaker relationship with the wider countryside.'* We **agree** with the designation of "Moderate" and the relevant considerations LUC have accounted for in applying this rating.



We would also note that the Assessment identifies measures which could further mitigate landscape effects such as maintaining the role of high ground south of Hawkshead Road and the safeguarding of boundary woodland and hedgerows. The promoter fully supports these proposals and these would not impede the allocation or implementation of the development proposed at site SB1.



View 2 looking south to the landscaped boundary



View 1 looking north towards the boundary with Swanley bar Lane

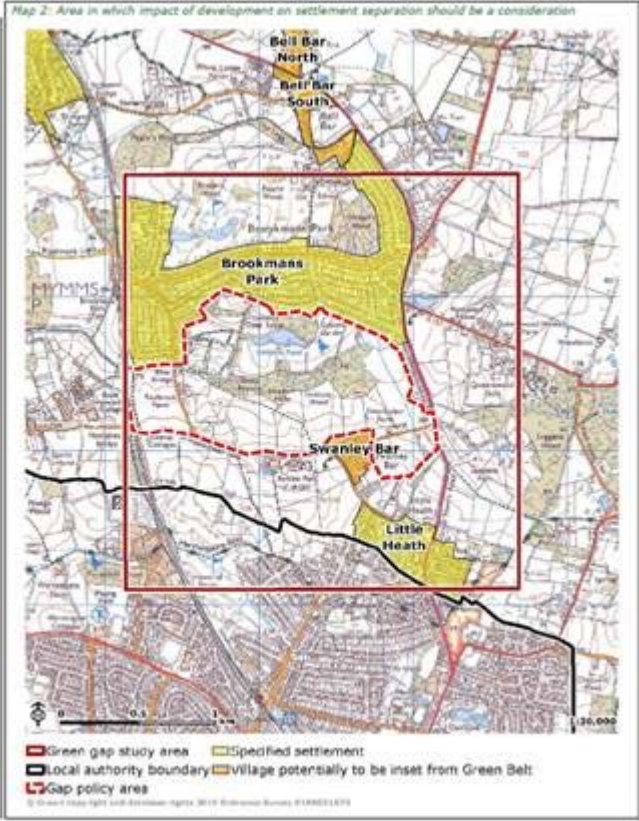
[EX160: Green Gap Assessment](#)

LUC's Green Gap Assessment (August 2019) refers to Swanley Bar at pages 92-96, which considers the relationship between Little Heath, Swanley Bar and Brookmans Park. LUC have in turn recommended a 'policy gap' approach that focuses exclusively on guaranteeing a buffer between Brookmans Park and Swanley Bar rather than any need to provide a buffer between Swanley Bar and Little Heath. It concludes that *'there is no real sense of separation between [Swanley Bar and Little Heath], and therefore no justification for the need for a gap policy area between these two settlements.'*

Despite the fact that the allocation of site SB1 would not reduce the gap between Swanley Bar and Brookmans Park, it is nevertheless included (alongside SB2) within the recommended 'policy gap'. The LUC analysis appears to incorporate SB1 and additional land to the east and north in order to *'resist...ribbon development along A1000 and Swanley Bar Lane'*. This is part of a wider strategic objective of reinforcing the Gobions Park Grade II Registered Park, which sits prominent between Brookmans Park and the settlement of Swanley Bar.

The promoter **rejects** LUC's findings and refutes the conclusions of the report in respect of the potential coalescence between Brookmans Park and Swanley Bar, noting inconsistencies in their analysis. Importantly, the focus of this rebuttal is the south-eastern edge of Brookmans Park and an alleged interaction with the area comprising SB1, to the immediate east of the settlement of Swanley Bar.

Firstly, when assessing 'gap size, character and strength' collectively, the author of the analysis concludes that there is 'inter-visibility between the edge of Swanley Bar and [Brookmans Park] ribbon development' which visually merges the two communities. In previous representations the promoter has recognised the need to maintain a visual separation and sees this as being achieved through the function of Gobions Park as an absolute constraint wedged between Swanley Bar and the wider settlement of Brookmans Park, and more specifically the retention of SB2, to the immediate east of SB1, which delineates Swanley Bar Lane from the Great North Road as a function of dense woodland. The author in turn recognises that 'ribbon development outside the settlement limits could result in the two settlements joining to the east of Swanley Bar', the 'settlement limit' which the promoter perceives to be the yard midway between the Swanley Bar and the Great North Road. There is, by consequence, a clear mandate to develop SB1 up to that yard 'edge' with SB2, the woodland adjoining to the east, benefitting as a green 'wedge' perpetually separating the two settlements.



The conclusion that the potential impact of the "cluster" to the east of Swanley Bar (comprising SB1 and SB2) would be to almost close the gap would be correct, though SB1 alone would not have this effect. It should also be noted that the Promoter has identified three development scenarios, which includes two smaller scenarios which have considerably greater separation from both the A1000 and Swanley Bar Lane. Therefore, no material detriment would arise to the development of SB1 (all or in part) and this particular section of the policy gap area should not have been included.

In addition to the response above, the report concludes misleadingly that development should not '*extend any further than the existing extents...to the east of Swanley Bar along Swanley Bar Lane*', with the caveat that '*development south of Swanley Bar Lane should be set well back from the roadside so as to retain a rural edge along Swanley Bar Lane so that there is no perception of the ribbon development on the Great North Road joining the ribbon development along Swanley Bar Lane*'. The latter part of LUC's guidance seems to agree with our earlier arguments, and from this explanation we can infer that the 'existing extents' of Swanley Bar is considered the yard that straddles the centre point between Swanley Bar Lane and its intersection with the Great North Road. The guidance therefore *supports* the development of SB1 *alone*, and not in conjunction with SB2, as we have suggested. It is thus difficult to understand why it would be advantageous as part of a 'policy gap'.

Conclusion

The promoter **agrees** with the "Moderate" sensitivity rating assigned to SB1, though had been hopeful for a more granular analysis that considered sub-divisions SB1a and SB1b respectively. On consideration of LUC's Green Gap Assessment, however, the promoter ultimately **rejects** the recommended policy gap and finds robust evidence that there are inconsistencies present in the incorporation of SB1 while suggesting that development could occur '*up to the existing extents...to the east of Swanley Bar*' and south of Swanley Bar Lane, so long as it is '*set well back from the roadside so as to retain a rural edge along Swanley Bar Lane so that there is no perception of ribbon development on the Great North Road joining the ribbon development along Swanley Bar Lane*.'

It should be understood that the Promoter has identified three development scenarios, which includes two smaller scenarios which have considerably greater separation from both the A1000 and Swanley Bar Lane. The promoter instead considers that SB1 as land to the immediate east of Swanley Bar is appropriate for development and would represent a logical extension to Swanley Bar, and should not constitute part of the recommended policy gap area.

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

Yours sincerely



Mark Aylward

ATP

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