

Our ref: MA/RN2/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,

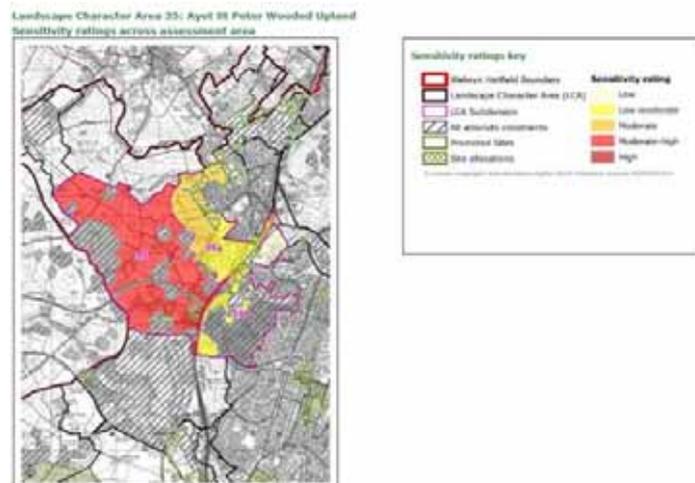
Site ID Wel16- School Lane, Welwyn.

Consultation Response in respect of documents EX156 and EX160 and considerations re proposed release of site Wel16 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](#)

"Wel16" Land at School Lane, Welwyn, is identified as part of Landscape Character 35 (subdivision 35A) in LUC's Landscape Sensitivity Assessment (July 2019). For reference, this parcel is analysed at pages 87-98 of the report, and is designated "Moderate" on the basis of a '*disturbance to the rural character (as a result of the busy A1(M) road), and the modern settlement edge at Welwyn [which] reduces the sensitivity to built development.*' Wel16 also borders an area east of Whitehill that LUC have described as "Low-Moderate", concluding that beyond this distinction there is '*greater containment from urbanising influences*'.



With respect to the report’s general conclusions, we agree that the areas to the south and south-east of Welwyn are broadly more exposed to urbanising influences than the west. The artificial division between landscape characters to the east and west of Whitehill is perhaps tenuous, and arguably many of the defining features of “Low” landform and settlement setting are exhibited in Wel16.

LUC do recognise that the village core lies within a relatively flat topographical “bowl”, and attributes more pronounced (and therefore sensitive) landform to the north of 35A where valley slopes to the River Mimram have been formed. As a corollary of this conclusion we would add that this particular sub-division of area 35A overlooks prominent physical features of Welwyn’s character that are threatened by proposed development, such as Welwyn Cemetery. By contrast, Wel16 is directly adjacent to the existing development grain and sits alongside the Queen Victoria Memorial Hospital and houses fronting School Lane; to the west of Welwyn Tennis Club, St.Mary’s School Playing Fields, in an overall closer proximity to village amenities as an exception to the assessment that *‘the majority of the area [35] is undeveloped with only small clusters of cottages, country houses and farmhouses’*.

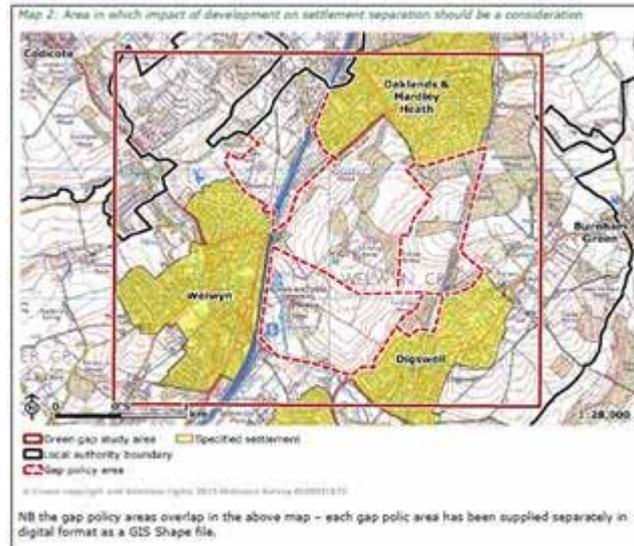
The promoter **accepts** the designation of “Moderate” but concludes that they represent a cautious and worst-case analysis.



Views across the site towards the north and north east

EX160: Green Gap Assessment

In order to safeguard the sense of separation provided between settlement clusters, LUC recommends 'gap policy areas' to the north (page 19), south-east (page 24), north and north-west (page 50) of Welwyn village.



As per Section 4, 'Conclusions and Recommendations', LUC recognises that the gap between Welwyn and Oaklands is '*vulnerable to further pressure*', and similarly identifies a policy area to '*protect settlement pattern and identity, and to prevent coalescence of Welwyn/Oaklands with Codicote*'. It is noted that Wel16 is geographically detached from neighbouring settlements and its allocation presents no detriment to the infrastructure, environment and characteristics of Codicote, Welwyn Garden City or Oaklands. The only area which is "free" from that constraint is the southern zone, of which Wel16 is constituent.

The promoter **agrees** with the overall conclusion that the site should not form part of any Green Gap Policy Area.

Conclusion

With reference to LUC's Green Gap Assessment (August 2019) it is clear that WEL16 does *not* form part of any recommended Green Gap Policy Area. The promoter acknowledges that EX156 and EX160 present no case against the allocation of Wel16. Insofar as we raise ancillary concerns regarding the landscape sensitivity 'rating' ascribed to the southernmost portion of area 35A, we agree that the site is part of the centre of the village and weaves neatly into the historical core of the village as demonstrated in previous representations. Indeed, with respect to 'landscape pattern' and 'natural character' criteria utilised by LUC, we might add that the agricultural quality of Wel16 is poor and should be accounted for. In addition the site's sustainability credentials are particularly strong, given that the site benefits from a pathway along School Lane that the promoter is seeking to further improve through infrastructural upgrades approved by Alan Storey of Hertfordshire County Council.

As clarified above, the promoter otherwise agrees with the methodology and conclusions drawn by LUC's 'green gap policy' approach, and its analysis of the fragility of gaps open between Welwyn and its neighbouring villages. Such areas contribute to the fundamental separation and distinctive identity of Welwyn village, which would otherwise suffer if encroached upon, in particular Welwyn Marsh which is also an area of ecological sensitivity and local importance given its relationship with the River Mimram that weaves through the village centre. The broader setting of this area requires safeguarding against any infrastructure or prospective urbanisation of the landscape resulting from development encirclement.

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

Yours sincerely

Mark Aylward

ATP

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