

Our ref: MA/WGC11/L002

Your ref:



Date: 31 October 2019

Louise St John Howe  
Programme Officer  
re Welwyn Hatfield Local Plan  
PO Services  
PO Box 10965,  
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Dear Louise,

## Site ID WGC11- Dobermann Club, Hertford Rd.

### Consultation Response in respect of documents EX156 and EX160 and considerations re proposed release of site WGC11 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](#)

The Dobermann Club ("WGC11"), adjoining Hertford Road, Welwyn Garden City, has previously been assessed as yielding "Moderate" Green Belt harm in the Welwyn Hatfield Stage 3 Green Belt Study (March 2019). WGC11 is also designated "Moderate" in the Landscape Sensitivity Assessment (July 2019) given its proximity to the urban fringe, though LUC have not specifically examined Landscape Character Area 43 of which it is part.

Whilst LCA43 has not been considered in detail through the July 2019 Assessment, the promoter **agrees** with the designation of site WGC11 as forming part of an area which is "Moderate".

We would add that WGC11 immediately adjoins the Haldens area of Welwyn Garden City and correspondingly would have no material bearing upon Tewin Water and Digswell as visually segregated landscape to that which lies north of the adjacent River Mimram.

#### [EX160: Green Gap Assessment](#)

Pages 20-24, 51-54 and 119 of LUC's Green Gap Assessment (August 2019) identify WGC11 as an area on the boundary between two recommended 'policy gaps', the first of which is between Welwyn, Welwyn Garden City and Digswell. The second considers a gap between Welwyn Garden City and Tewin.

## Area between Welwyn Garden City and Tewin (East Hertfordshire)

Map 1: Study area



There appears to be no credible consequence of the release of the WGC11 site in terms of safeguarding against the coalescence of Welwyn Garden City and Digswell. The rationale for incorporating WGC11 in any Green Gap Policy Area would be, as we understand it, in recognition of a 'narrow' rural gap splitting Welwyn Garden City and Tewin, though this justification is undermined in subsequent analysis of the factors that seek to safeguard this '*strong sense of separation between the two settlements*'.

The promoter therefore **rejects** LUC's analysis, with three main reservations.

First and foremost, the promoter notes an inherent contradiction in the justification for extending the 'policy gap' for the purposes of protecting the division between Welwyn Garden City and the Tewin area, while concluding later in the Assessment that '*the River Mimram and its associated designation creates a distinct division*' that ensures such gap '*is not at significant risk of closure*'. While the promoter accepts that policy gaps are not intended or construed to altogether exclude or prohibit development, the gap is (as the author of the recommendation admits at page 119) preserved by nearby ecological designations. Thinner 'strips' of land, such as that which constitutes WGC11, particularly if adjoining established urban settlements, do not represent the same potential for coalescence as larger parcels provided their development is limited by the boundaries established by absolute constraints.

In a similar vein to the inconsistencies outlined above, the desire to 'keep open' sloping land does not by consequence control the inter-visibility between Welwyn Garden City, Tewin and Digswell. In fact, as LUC has maintained, '*topography and vegetation can provide an effective screening function*', which we argue visually distinguishes WGC11 from neighbouring settlements and buttresses its appropriateness as a logical extension of the Haldens area of Welwyn Garden City. That such development would '*extend the edge of Welwyn Garden City down the valley slopes and to the Borough boundary*' neglects the intrinsic features of containment (most prominently the B1000 itself, but also the lack of direct roads between both settlements) that manifest as practical development limits. Page 21 exemplifies this.



*View within the site looking north east towards the B1000*



*View looking north from the existing residential development*



*Panorama showing residential development adjacent to and overlooking the site*

Thirdly, the Green Gap Study considers the identified gaps and any potential for pressure upon those gaps both by consequence of draft allocations and promoted sites. In other parts of the Green Gap Study, promoted sites have been identified where they could potentially result in some pressure on those gaps. WGC11 is not identified as representing a point of pressure or threat upon the gap between Welwyn Garden City and Tewin (or the gap between Welwyn, Welwyn Garden City and Digswell). This 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.

We would note that the Study identifies measures which could further mitigate coalescence effects such as the maintenance and strengthening of boundary screening. The promoter fully supports these proposals and these would not impede the allocation or implementation of the development proposed at site WGC11 which already benefits from strong screening.

### Conclusion

The promoter **agrees** with the "Moderate" sensitivity rating assigned to WGC11, Landscape Character Area 43.

Conversely, the promoter **rejects** the conclusions of LUC's Green Gap Assessment on two interrelated accounts, the first being aptly summarised as the presence of a clear development limit established by 'absolute constraints', and the latter as a disproportionate weighting towards the size of the gap to the neglect of its character and the substantial features of containment that mitigate alleged coalescence. In addition, we have noted that the Green Gap Study has not sought to identify the WGC11 promotion as a point of pressure or threat which reinforces these conclusions.

We conclude that WGC11 is fundamentally peripheral to the identified Green Gap Policy Areas and is not material to any planning role that they would serve. We would recommend that either the boundaries should be redrawn to exclude WGC11, or that it be expressly recognised that its release in isolation (with appropriate screening) would not cause material harm. We have also set out above the apparent inconsistencies between analyses at two stages of the report, on pages 20-24, 51-54 and 119 of the LUC's Green Gap Assessment.

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

Yours sincerely

Mark Aylward

ATP

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