

Our ref: MA/WGR7/L002

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 WGr7/ WGr7a- Heath Road, Woolmer Green.

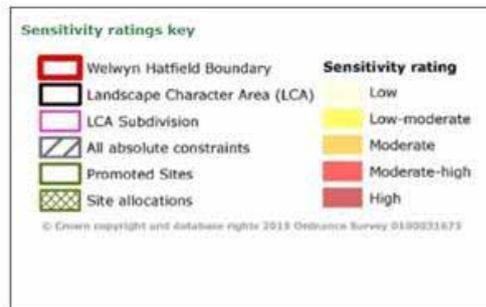
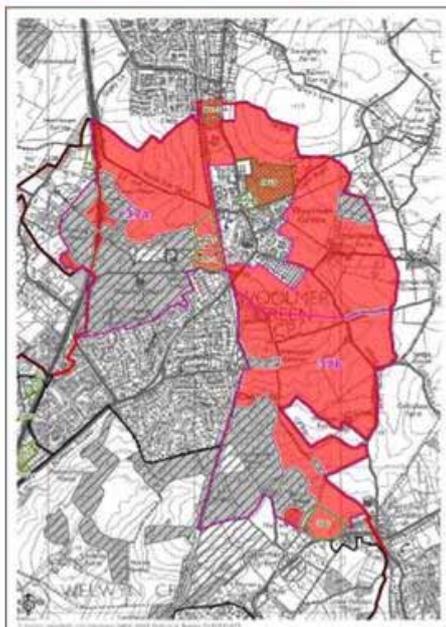
Consultation Response in respect of documents EX156 and EX160 and considerations re proposed release of site WGr7 / WGr7a for residential-led uses

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](#)

LUC's Landscape Sensitivity Assessment (July 2019) examines land north of Heath Road, Woolmer Green ("WGr7" and "WGr7a") as part of Landscape Character Area 37, 'Datchworth Settled Slopes'.

Landscape Character Area 37: Datchworth Settled Slopes
Sensitivity ratings across assessment area



It is noted that Area 37 is in its entirety deemed of “Moderate-High” sensitivity and that this is predominantly because of its visual prominence resulting from its sloping, open landform, which has high inter-visibility across the settlements of Woolmer Green, Mardley Heath and the southern edge of Knebworth.

The promoter **rejects** this conclusion and the designation of WGr7/WGr7a as exhibiting “Moderate-High” harm, on the grounds that relevant considerations to variable sensitivity across Landscape Character 37 are misapplied. In particular, where the report concludes that *'landscape sensitivity is reduced by the presence of the A1(M) and the railway line, both of which produce significant sound pollution'*, the deleterious effects of these features should be visible in such a way that those parcels in the closest proximity should exhibit lower landscape sensitivity.



Proximity of the site to the railway line



View looking east towards the development in Woolmer Green

In the context of other study areas within the assessment, proximity to transport corridors and consequent effects upon tranquility have resulted in reductions to landscape sensitivity but this does not appear to have been applied in this instance. This, too, applies where particular land parcels are contiguous with residential settlements and their rural characteristics correspondingly 'diluted' as a product of their proximity. In neither case is the designation of WGr7/WGr7a a reflection of the radial effect of these urban influences, nor are the real limitations or 'absolute constraints' to development factored into the general analysis, which stand in direct contrast to the openness of the Landscape Character Area as a whole. WGr7/WGr7a, we argue, fits neatly between the boundaries of three development limits constituting the historic woodland to the west, the rail line to the immediate east and the Great North Road to the south.

We would therefore recommend that the designation of WGr7/WGr7a should be reconsidered as it is inconsistent with other analyses within the Assessment. The extent of Landscape Sensitivity, by consequence, should be concluded as lower than the exhibiting "Moderate-High" harm currently ascribed to the site.

EX160: Green Gap Assessment

LUC's Green Gap Assessment (August 2019) also examines WGr7/WGr7a in the context of possible coalescence between Woolmer Green and Oaklands, pages 9-13 of the full report.



As the 'summary and recommendations' section explains, WGr7/WGr7a are incorporated within a 'gap policy area' on the basis that the two settlements 'have separate identities...different topographies (one on high ground, one on low) and the presence of the railway line that runs between them.' The promoter **rejects** this reasoning, and in contrast explains why these are in fact *justifications* for the release of WGr7/WGr7a and their omission from the suggested policy gap approach.

'Separate identities'

In consideration of the first reason for establishing a policy gap that annexes WGr7/WGr7a, we would contend that the settlements of Oaklands, Mardley Heath and Woolmer Green are distinguishable communities sharing a common environment. As part and parcel of their development along the Great North Road, each settlement

is its own independent entity, even if there was limited perception of separation. Given such circumstances a 'policy gap' approach overlooks the complexities of their historical evolution and the importance of the Great North Road as a transit through each settlement. Development of WGr7 would not compromise independence.

'Different topographies'

From the Great North Road which descends from Oaklands & Mardley Heath to Woolmer Green, it is clear that there is a 'step' from one settlement to the other. By consequence, development of WGr7/WGr7a would not physically 'link' both communities, and their separation would remain visually apparent. LUC recognises this with the suggestion that 'substantial landscape treatment', if employed, would prevent any erosion of the rural setting and consequential inter-visibility between the two settlements. The promoter has in previous representations given robust examples of how this can be achieved.

'The presence of the railway line...and urban character of Woolmer Green'

Finally, the presence of the railway line that runs between the settlement is not a detriment to development, but rather 'fixed' infrastructure that has diluted the rural character of the land to the west of Woolmer Green. This aural intrusion could be alleviated by sound screening such as acoustic fencing, which would protect the tranquillity and ecological significance of Mardley Heath Local Nature Reserve and Local Wildlife Site.

Conclusion

As a consequence of WGr7/WGr7a's proximity to the urban grain of Woolmer Green and the neighbouring railway line, the Landscape Sensitivity Assessment for Landscape Character Area 37 should exhibit a graded sensitivity rating that reflects the lower sensitivity closer to transport infrastructure and its ancillary aural intrusion. Correspondingly, WGr7/WGr7a should not feature as part of a proposed 'policy gap', as it forms a logical appendage to a settlement with a separate and distinguishable environment (topographically, and ecologically) within a shared environment historically evolving from the importance of the Great North Road.

We would recommend that the designation of WGr7/WGr7a be reconsidered as it is inconsistent with other analyses within both the Landscape Sensitivity Assessment and the Green Gap Study which seek to value the opportunity for strong boundary features and recognise that areas close to transport corridors can have reduced sensitivity. We therefore **reject** the conclusions of both EX156 & EX160 in relation to WGr7/WGr7a.

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

Yours sincerely



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