

WELWYN HATFIELD DISTRICT COUNCIL

DRAFT LOCAL PLAN  
EXAMINATION IN PUBLIC

DOCUMENT EX156:  
LANDSCAPE SENSITIVITY DOCUMENT,  
JULY 2019

DOCUMENT EX160:  
GREEN GAP ASSESSMENT FINAL DRAFT  
REPORT, AUGUST 2019

SUBMISSIONS MADE IN RESPECT OF SITE  
WEG1

UNITS 1-3, 51 WELHAM MANOR, AL9 7EL

ON BEHALF OF NICON DEVELOPMENTS  
LIMITED AND HEATHBUSH LIMITED

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## 1 INTRODUCTION

- 1.1 These representations are made following the publication of the above documents and should be read in conjunction with the documents previously submitted in support of the allocation of this site for housing.
- 1.2 In a memorandum in December 2016, the LP Inspector stated that the plan as submitted does not provide sufficient housing development proposals to enable sufficient dwellings to meet the Full Objectively Assessed Housing Need (FOAHN), (12,400 dwellings) prepared on behalf of the Council prior to its submission of the plan, to be built. It adds that subsequently, a revised FOAHN assessment based on the 2014 household projections, prepared by the Department for Communities and Local Government, suggests a much higher FOAHN (16,000 dwellings).
- 1.3 The Inspector has also stated that the acuteness of the need for housing in the borough is sufficient to justify exceptional circumstances to release land from the Green Belt. The Inspector also opined that that further evidence is required in terms of the harm to the Green Belt and to consider what parts are essential to retain. He indicated that the plan is unsound in its current form but is capable of being made sound if additional housing sites are identified.
- 1.4 On this basis, the Inspector requested that the LPA to carry out a further Green Belt Study to seek to identify additional sites for housing. The Welwyn Hatfield Green Belt Study Stage 3 was published in August 2018. This is known as the Green Belt Review (GBR).
- 1.5 Table 7.1 (Green Belt Assessment of Harm Ratings) indicates that the release of site WeG1 for housing would result in low harm to the green belt. Moreover, its release in conjunction with most other nearby sites would only occasion moderate harm.
- 1.6 Page 292 of the appendices to the GBR confirms the low harm of release and concludes that in relation to sites WeG1 and WeG2 that *'These sites are located in the northwest of the parcel adjacent to the urban edge of Welham Green. WeG1 includes a building and hardstanding associated with a vehicle repair shop surrounded by trees. WeG2 is an area of scrubland. Both do not make a significant contribution to Green Belt purposes and their release would not compromise openness or extend the existing settlement edge beyond the existing line to the west'*.

## 2 SITE WEG1: UNITS 1-3, 51 WELHAM MANOR, AL9 7EL

- 2.1 A full description of the site and its surroundings is set out in the representations dated January 2019, but the key site attributes are summarised below:
- It is bordered by existing housing development on its northern and western sides.
  - The site is less than 500m from the centre of Welham Green,
  - The site is located close to local bus stops and within 1 km of Welham Green Railway Station
  - The site is occupied by a number of buildings, all of which are poor in appearance and are used for various commercial purposes
  - The site falls within the definition of previously developed land as set out in the NPPF (2012)

## 3 DOCUMENT EX156: LANDSCAPE SENSITIVITY DOCUMENT

- 3.1 This document includes the site within Landscape Character Sub-Area (LCA) 29b 'Southern settlement edge of Welham Green'. Page 38 of the document suggests that this zone has a moderate sensitivity to residential development.
- 3.2 Page 38 indicates that to minimise adverse impact on landscape and visual character, development proposals should:
- Maintain a transition from settlement to open fields to wooded backdrop.
  - Maintain and enhance hedgerow boundaries

## 4 DOCUMENT EX160: GREEN GAP ASSESSMENT FINAL DRAFT REPORT

- 4.1 The relevant section of this document is that dealing with the Area between Welham Green and Brookmans Park.
- 4.2 On page 37 it states that there are a number of promoted sites put forward in response to the Council's 2019 Call for Sites and that development of all of which would erode (but not completely close) the gap.
- 4.3 The site is not included within the Gap policy area shown on page 39.

## 5 SUBMISSIONS

- 5.1 The GBR indicates that the release of site WeG1 for housing would result in low harm to the green belt.
- 5.2 Clearly, given the context of the site as set out in paragraph 2.1 above, its release for housing would not have a harmful impact on the openness, appearance and purposes of the Green Belt.
- 5.3 LCA 29b extends over a very wide area, and a considerable distance south and west. This means that the analysis in the LSD is very broad brush and does not account for the very varied landscape characteristics of individual sites. In isolation, given its specific characteristics, particularly its strong boundary screening, Site NS1 has a 'low' landscape sensitivity rating.
- 5.4 The release of the site for housing would not conflict with the aims of the LSD as set out on page 38.
- 5.5 If the site were to be developed in isolation, the village would not be extended beyond its southern or western limits.
- 5.6 The site is not included within the Gap policy area shown on page 39.
- 5.7 Therefore, in the terminology used by the Inspector, it is not essential that this site remains in the Green Belt.