

# **Examination of the Welwyn Hatfield Local Plan 2013-32**

## **Regulation 19 (submitted) sites**

### **INSPECTORS' MATTER AND ISSUES**

#### **Northern Settlements**

**Consultation was undertaken about these sites at the Regulation 19 stage in 2017. All representations received at that time will be considered and it is not necessary for them to be repeated verbatim.**

**Any representors wishing to make further submissions on the matters and questions listed below, should do so before March.**

#### **Woolmer Green**

**The Inspector is aware that a residential development has been permitted, via a planning appeal, on a part of site EA 10, London Road, Woolmer Green.**

#### **Policy SADM 27, Site HS 15 (WGr1), Land east of London Road**

This site is within the Green Belt and the National Policy Framework (NPPF) says at paragraph 136 that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of plans. As well as addressing the matters raised by representors and although not exclusively, the following questions are in part designed to establish what exceptional circumstances, beyond the Council's inability to identify sufficient land outside of the Green Belt in order to meet its Objectively Assessed Housing Need, exist to justify the release of these sites, in the context of the local and site circumstances.

#### **Matter 1 – Historic Heritage**

Paynes Farm is a heritage asset of national significance. In preparing Local Plans the NPPF requires Local Planning Authorities to recognize that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. The Planning (Listed Buildings and Conservation Areas) Act 1990 also requires them to have special regard to the desirability of preserving the setting of listed buildings.

- 1) To what extent has the proposal had regard to the available heritage evidence?
- 2) To what extent does the site impinge upon the setting of the Listed Building?

Table 11 says that a landscape buffer is to be established to the east of the site to protect the setting of the adjacent listed building.

- 3) In the context of the site boundaries on the proposals map, where is this buffer to be?

- 4) How wide is this buffer expected to be?
- 5) In this context would the development be harmful to the setting of the heritage asset?
- 6) If not, why not?
- 7) Would any harm be substantial and if not, what weight should be given to it?
- 8) Has the impact of development on the setting of the heritage asset been given adequate consideration?

## **Matter 2 – Environmental Considerations**

At paragraph 100 the National Planning Policy Framework (NPPF) says that Local Plans should develop policies to manage flood risk from all sources. It also points out at para. 109 that the planning system should prevent new and existing developments from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.

### **Water**

- 9) How would the surface water at this site be managed?
- 10) Has a flood risk assessment been carried out?
- 11) Are there any on or off-site ramifications for flood risk that would result from the implementation of the proposed development?
- 12) Would the site's development require a balancing pond?
- 13) If so how extensive would this be and where would it be located?
- 14) How would foul drainage be dealt with?
- 15) Are there any foul drainage constraints that would impede the implementation of any development?

## **Matter 3 – Infrastructure**

The Framework in Section 8 seeks to create healthy, inclusive communities through the planning system and to deliver the recreational and cultural facilities and services the community needs through a proactive and positive approach. In Section 9 it promotes sustainable transport and the provision of viable infrastructure, necessary to support sustainable development.

- 16) Has the proposal's impact on local infrastructure been effectively considered?
- 17) Would the cumulative impact of the traffic generated by the development have an unacceptable impact on highway safety without mitigation?
- 18) Would the cumulative impact of the traffic generated by the development have a severe impact on the road network without mitigation?

- 19) If so what would this mitigation involve and is the site's overall viability sufficient to be able to financially support any necessary highway improvements?
- 20) Is there sufficient capacity within local schools to provide places for the children likely to be generated by the development?
- 21) If not, what extra capacity is required and where would it be located?
- 22) Is there sufficient capacity within local health services to meet the primary health care needs of the persons who would reside in the development?
- 23) If not, what extra capacity is required and where would it be located?
- 24) Is a local convenience store being provided at the approved Entech House development?
- 25) Would there be a requirement for additional or improved retail or community facilities within Woolmer Green if this development was implemented?
- 26) If so what would these additional facilities involve and where would they be located?

#### **Matter 5 – Sustainability**

The Framework at paragraph 5 says that the purpose of the planning system is to contribute to the achievement of sustainable development.

- 27) Is Woolmer Green a sustainable location for development?
- 28) Are there opportunities for significant residential development within the existing settlement limits, thereby using brownfield land?
- 29) What is the balance between local employment provision and economically active residents?
- 30) Is the amount of employment land and the number of businesses in Woolmer Green disproportionate to the amount of housing, existing and proposed?
- 31) Has this site been appropriately assessed in the sustainability appraisal?

#### **Matter 4 – Green Belt**

The National Planning Policy Framework stresses that the government attaches great importance to Green Belts and says that Green Belt boundaries should only be altered in exceptional circumstances.

The Council carried out a stage 3 Green Belt Review in 2018/19 in order to ascertain the contribution that a finer grain of sites, than were previously examined, around the urban fringes within the district, made to the different purposes of the Green Belt. In this assessment the overall harm at this site is considered to be Moderate/High but the parcel is not identified as an area of most essential Green Belt. In this context:

- 32) Is the overall assessment of Moderate/High harm a sound interpretation of the contribution that this site makes to the purposes of the Green Belt?
- 33) In that context, is the allocation of this site justified, effective and consistent with national planning policy?
- 34) Do exceptional circumstances exist to release this site from the Green Belt and if so, (other than Welwyn/Hatfield's housing need), what are they?
- 35) Does the site infringe upon the existing gap in built development between Knebworth and Woolmer Green?
- 36) Table 11 suggests the implementation of a landscape buffer along the northern boundary.
- 37) In the context of the site boundaries on the proposals map, where is this buffer to be?
- 38) How wide is this buffer expected to be?
- 39) Once established, what impact would the landscape belt have on the openness of the Green Belt?
- 40) Is the proposed new boundary to urban development as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

### **Matter 5 – Implementation**

- 41) When would the site realistically be likely to be able to deliver dwellings within the plan period?

### **Policy SADM 10, (Site EA 10), Land at London Road**

- 42) What is the justification for protecting the existing designated employment sites within Woolmer Green?
- 43) Does the proposed extent of Employment Area EA10 adequately provide for the expansion of established businesses in the area?
- 44) Does Woolmer Green have adequate transport links to foster a developing business community?
- 45) Are the existing employment sites sustainable?
- 46) Is the requirement to demonstrate three years of unsuccessful marketing in Policy SADM 10 criterion iii. Too onerous.

## **Oaklands and Mardley Heath**

### **Policy SADM 28, Sites HS 16 (OMH8) and HS 17 (OMH5) Land west of Great North Road**

- 47) Have the ramifications of air and noise pollution from the adjacent motorway on the potential living conditions at these sites been fully considered in the context of the potential of these sites to provide for residential development and their viability?

### **Policy SADM 28, Site HS 32 (GTLAA04), Four Oaks, Great North Road**

- 48) What was the outcome of the planning application for 20 pitches referred to in representations?
- 49) Has the site's capacity for pitch extension been objectively assessed?
- 50) Have the ramifications of air and noise pollution from the adjacent motorway on the potential living conditions at this site been fully considered?
- 51) What mitigation is to be put in place?
- 52) Is six additional pitches the optimum outcome for the proposed extension to this site?
- 53) Is the proposal positively prepared and justified?

## **Welwyn**

### **Policy SADM 29 Site HS 18 (Wel 11) The Vineyards**

- 54) Have the biodiversity aspects of this site been appropriately considered and have the implications of any harm been fully assessed in the context of the site's suitability for residential development?

### **Policy SADM 29 Site HS 19, (WE I4) Sandyhurst**

- 55) Have the ramifications of air and noise pollution from the adjacent motorway on the potential living conditions at this site been fully considered?

### **Policy SADM 29 Site HS 20 (Wel11) School Lane**

- 56) Has the site's capacity for residential development been objectively assessed?