

Welwyn Hatfield Local Plan examination hearings stage 9

Representation regarding site WGC4a (extension of Panshanger airfield site SDS1)

The inspector has invited comments regarding document EX225 and EX219G relating to site WGC4a. This site was included as an additional sites in both the 2019 and 2020 consultations by the council. Since then, more details have also emerged for this site and the proposed numbers have increased by another 120 homes. I would therefore like to address the issues with this site and the increasing numbers allocated to it.

In the originally submitted local plan, site WGC4/SDS1 was put forward to accommodate 650 homes on the ASR assigned land on the Airfield site. Outline planning permission was granted in early 2019 and it was judged to be sound in subsequent examination hearings.

This new proposal however, extends the development to include a significant part of the Green Belt to the north of the original allocation. In the 2019 call for sites, this was put forward with a total of 75 additional homes. However, this number is being constantly increased – another 90 proposed in Jan 2020 and now another 30 in Jan 2021, which must increase the density and extend the footprint of the site further. This now amounts to 845 homes on the whole site, an increased shopping area and 12, rather than 6, gypsy and traveler pitches in an unspecified location.

As the inspector may recall, there are already many constraints to building on this site:

- The potentially high visibility of building too far north on the skyline which would impinge on and devalue the setting of the Mimram valley and heritage assets to the north.
- The need to have a green belt buffer for the setting of the listed Panshanger Park to the East.
- The constraints on building height to 2 stories over the majority of the site required by Heritage England.
- The requirement for bio-diversity offsetting from the original, ASR part of the site which is supposed to be accommodated on the green belt part of the site. This is now being squeezed into a narrow corridor which is inadequate for this purpose.
- The requirements in the site policy to have adequate visual screening for the site from the north in place before development begins. This screening must be accommodated on or near the brow of the hill as it would not serve its purpose if it is placed too far down the slope.
- Adjacent housing densities are around 25-35 dph along the development edges. With the additional 120 homes, building on the whole site will be at 40+ dph, juxtaposing a higher density of housing in an uncharacteristic way which would have to be extended to the settlement edges. This means the new housing will be out of keeping with the existing settlement.
- The Green belt assessment of this site extension is moderate to high harm, but combined with the sustainability assessment, it ranks substantially higher harm than other alternative sites. The site is relatively distant from employment hubs, the town centre and train stations and has poor bus services.

The outline plans so far produced by Homes England for the whole site demonstrate that the gap between the housing and the site boundary along most of the northern edge is very narrow – down to 20m or less in many places. Since the screening trees and vegetation are planned to be put within the site boundary, this northern corridor is inadequate to accommodate these screening trees, the

biodiversity offset and the green corridor requirements for both people and wildlife. Far from being a pleasant green corridor from the west of the site to link to Panshanger Park and to a green corridor to the SE of Welwyn Garden City, it will become a narrow, overused, unattractive route. Within the outline planning permission for site SDS1 (6/2018/0873/OUTLINE) there is a requirement for offset biodiversity compensation to be accommodated on the green belt site WGC4a. If WGC4a is allocated more housing, there will be insufficient space for biodiversity offset for the SDS1 site, let alone both the combined sites. It is also hard to see how they could enhance the pre-existing habitats, with its abundance of diverse wildlife which originally grew up alongside the operational airfield. Any development on this site will already create an ecological deficit, which this thin strip of land and the land near the B1000 cannot possibly replace.

The western side of the site is already surrounded by many blocks of flats and denser housing whose main access to green space is on Hillyfields. When you then build dense housing on Hillyfields itself, there will be very limited open green space and even more people who need it. In a time when it seems probable that more people will continue to work at least partially from home, green leisure space will be at a premium. Building across this much of the Green Belt portion of the site will drastically reduce the green spaces available for people to enjoy and result in poorer health outcomes. Both Homes England and Tarmac (to an extent) are also relying on Moneyhole Park to provide green space and outdoor sporting facilities for many of the new residents as well as existing residents. The park is already very busy and accommodating this many more people will have a significant detrimental effect. There are currently around 2300 homes within walking distance of the Park. The combination of this development and the adjacent East Herts BGS(N) development will add a further 2200 homes in the immediate vicinity, of which at least 1200 would have Moneyhole Park as their nearest public parkland and outdoor sporting facility.

It is also clear that Homes England are proposing to provide an inadequate number of affordable houses on the site. They propose that only 195 affordable homes will be built. At the local plan policy rate of 30% for this site, 195 affordable homes only equates to the planned 650 homes – i.e the original site allocation. If no affordable homes are therefore being planned for the green belt extension part of the site (proposed allocation of 75), nor for the extra 120 proposed by increasing the combined site density only 23% of the homes will be affordable. This would leave a deficit of 59 affordable homes on the combined site and should therefore be considered unsound. Homes England, as a government body should surely be seeking to surpass the minimum provision of affordable housing, rather than under providing it.