

**Examination of the Welwyn Hatfield Local Plan 2013 – 2032**

**Regulation 19 (submitted Sites)**

## **Woolmer Green**

**Policy SADM 27, Site HS 15 (WGr1), Land east of London Rd.**

**Statement on Behalf of Woolmer Green Parish Council and  
CPRE Hertfordshire**

**By Jed Griffiths MA DipTP FRTPI**

**April 2020**

## **Introduction**

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of Woolmer Green Parish Council and the Campaign to Protect Rural England Hertfordshire (CPREH). It has been compiled in response to an invitation by the Examination Inspector to submit supporting material to be considered at Stage 8 of the hearings. This statement addresses the matters, issues, and questions relating to land to the east of London Road, Woolmer Green. The site was allocated for housing in the Draft Local Plan 2016, under policy SADM 27, as site HS15 (WGr1).
2. Earlier representations about the policy, objecting to its development for housing, were made by the Parish Council and CPREH at the Regulation 19 stage. Where appropriate, references will be made to the original statements of objection and to other representations made at earlier hearings. The main purpose of this statement, however, is to focus on the matters and questions set out by the Inspector in the schedule published on 17<sup>th</sup> March 2020.
3. Both the Parish Council and CPREH acknowledge the point made in the Inspector's introductory note, relating to the location of the site within the Green Belt. In earlier representations, they have stressed that Green Belt boundaries should only be altered in exceptional circumstances. At the Regulation 19 stage, they argued that "exceptional circumstances" did not exist for the release of this site from the Green Belt. Its development would be contrary to four of the main purposes of the Green Belt, as set out in the National Planning Policy Framework (NPPF). As explained below in this statement, circumstances have changed considerably since 2016 when the Draft Local Plan was published. These changes have reinforced the case for the removal of policy SADM 27 from the Draft Local Plan.

### **Matter 1 – Historic Heritage (Questions 1 – 8)**

4. In its representations on the Draft Local Plan, the Parish Council raised its concerns about the potential impact of housing development on the setting of the Grade II listed Paynes Farm. The farmhouse is an important component of the historic character of the village, which has been eroded by modern housing development. As the Parish Council have pointed out, the development of site HS15 would be predominantly on sloping land which rises to the south east of the village. The farmhouse lies in a depression and the adjacent fields slope upwards on three sides. The proposed development would therefore be clearly visible from rights of way beyond the village, and would destroy the setting of Paynes Farm, contrary to the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. A photograph attached to the Regulation 19 statement illustrates this point.

5. The Borough Council have clearly acknowledged that there would be an impact on the setting of the listed building, and have proposed in Table 11 a landscape buffer to mitigate the effect. In response, the Parish Council consider that the potential harm would be substantial and that a landscape buffer would not overcome the impact of the proposed development on the setting of Paynes Farm. As the photograph clearly shows, the setting of the building is essentially open in nature – the juxtaposition of the farmhouse and the surrounding fields is fundamental.

### **Matter 2 – Environmental Considerations (Questions 9 – 15)**

6. In its Regulation 19 representations, the Parish Council drew attention to the risks of surface water flooding arising from the proposed development of site HS15. Attached to the statement, photographs showed the extent of flooding in New Road in the 1980s and in 2014. Incidents of flooding are common, the most recent of which occurring in February 2020. Flooding has extended beyond the highway – to the field opposite New Road. Without compensatory measures, development of the site would put the existing community at an unacceptable risk.

### **Matter 3 – Infrastructure (Questions 16 – 26)**

7. In the view of the Parish Council, the impact of the proposed development on infrastructure has not been adequately considered in the Draft Local Plan. It is understood that the main access from the B197 to HS15 would be directly opposite the entrance to the former EnTech site. The cumulative effect of the development of site HS15, together with the completion of the EnTech site, would have an unacceptable effect on highway safety in the village. The B197, which runs through the centre of Woolmer Green, takes most traffic movements and has been a major concern to the Parish Council for at least ten years. Following discussions with Hertfordshire County Council, the carriageway was narrowed in 2014. This has not been particularly successful, partly because the 40 mph speed limit has been retained. The Parish Council has been successful in obtaining a PCC Road Safety Fund grant , but the County Council has not yet (April 2020) given any details of what works will be carried out.
8. The Parish Council and local residents continue to press for a 30 mph speed limit in the centre of the village. The B197 is frequently at capacity, especially at peak hours, and is used by drivers seeking to avoid the busy section of the A1(M) between junctions 6 and 8. Any substantial increase in traffic, focused on the B197, would have a severe effect on road safety and lead to an increase in air pollution, to the detriment of the health of local residents.

9. The village primary school has doubled in size since 2010, but is currently at capacity. There are no plans for further expansion, and it is likely that schoolchildren would need to travel to Knebworth, where additional school places may occur as part of the North Hertfordshire Local Plan. This would generate additional pressures on the B197 road.
10. Primary health care for Woolmer Green is largely provided at the Knebworth GP surgery. The North Hertfordshire Local Plan, currently at examination, contains proposals for an additional 736 dwellings in Knebworth. Together with the proposals in Woolmer Green and Codicote, it is clear that there would be a considerable shortfall in capacity at the Knebworth surgery. This is equivalent to 5,000 patients and there are no proposals in order to address this issue.
11. In terms of local facilities and services, the promoters of the site have suggested the provision of a “farm shop” as part of the development. In April 2020, a row of four shops, including a local convenience store, was under construction on the EnTech site, which would be more than sufficient provision for a small village. In addition, the chocolate factory has just constructed an extension which includes a café.

#### **Matter 4 – Sustainability (Questions 27 – 31)**

12. Although Woolmer Green is well-connected by road, it is not totally self-sufficient. The Borough Council’s recent site allocations consultation has demonstrated that there is an opportunity for significant residential development in the village, using brownfield land. The proposal to allocate site WE100 (51 – 53 London Road) for housing is strongly supported by the Parish Council, even though it would result in the loss of 0.85 hectares from the Employment Area (EA 10) as shown in the Draft Local Plan.
13. The reference (Q29) to the balance between local employment provision and economically active residents appears to relate to the decision by the Borough Council to designate Employment Area EA 10 in the Draft Local Plan. As the Parish Council has pointed out in its Regulation 19 submissions, a substantial proportion of site EA 10 is covered by a national car dealership with a limited lease on the land. Most of the firm’s employees are not local, and there is only a very small linkage between employment on the site and households in the village. There are two other firms – a family-run chocolate factory and shop, and a stone-cutting business (Cawdor).

14. In its Regulation 19 submissions, the Parish Council has supported the notion of a “working village” but has accepted that this is a dated concept. Since 1990, the village housing stock has grown by over 50%, mainly due to businesses moving out of the area. No large firm has moved into the village, which is more suited for small-scale local business. The allocation of a large employment area in the village has been described by the Parish Council as “unsustainable, unrealistic, unjustifiable and undeliverable.”
15. The Parish Council believes that a lack of local knowledge led the Borough Council to designate the EnTech site as part of a larger employment area. At its business peak in the 1980s, the firm employed 30 – 40 people, but at its closure only three or four. At the time of writing, four small business units were being built above the new shops – this will help to redress the balance in local employment.

#### **Matter 5 – Green Belt (Questions 32 – 40)**

16. In introducing this matter, the Inspector has noted the findings of the Council’s Stage 3 Green Belt Review (EX99A – E), which concluded that the harm rating on site HS15 was considered to be “moderate/high”. The Parish Council and CPREH profoundly disagree with this assessment which does not reflect the contribution that the site makes to the purposes of the Green Belt, for the reasons set out below.
17. As both the Parish Council and CPREH have pointed out in previous submissions, the area to the east of the village is open and undulating in character. Development of HS15 would encroach considerably into the open countryside. The Stage 2 Green Belt Study (GB/2) concluded that the site made a “significant contribution” to the Green Belt. The Sustainability Appraisal stated that development of the site would have “significant adverse effects” on local distinctiveness and the historic environment.
18. In response to Question 35, there are two issues. First, there is the potential for Knebworth to expand southwards towards Woolmer Green. This is evidenced by the proposal to develop 200 dwellings on land to the east of Knebworth, as set out in Policy KB4 of the Draft North Hertfordshire Local Plan. Second, consultation on the Welwyn Hatfield Local Plan has raised considerable concerns that Woolmer Green could expand northwards towards Knebworth. The sensitivity of the gap between the two villages was highlighted in the Green Gap Assessment, prepared by LUC for the Borough Council in 2019 (EX160). The report reinforces the shared view of the Parish Council and CPREH that development of HS15 would have a major impact on the openness and integrity of the gap, in the tract of countryside to the east of the B197.

19. To some extent, the Borough Council seems to have acknowledged these issues, from the new evidence which has been generated during the course of the Local Plan examination. In the current consultation on changes to the site allocations, the Borough is recommending that site WGr3, adjacent to the built-up area of Knebworth, should be removed from the Draft Local Plan.
20. The Parish Council are concerned that the current site allocation of 150 dwellings could be increased substantially. A draft master plan published by the site promoters showed a “village green” – this could easily accommodate more housing. Woolmer Green already has areas of recreational open space, without needing to sacrifice good quality agricultural land.
21. In response to Question 32, taking into account all the above factors, the Parish Council and CPREH strongly believe that the site should have a “high” harm rating.
22. In addition to the detailed points above of the potential harm to the Green Belt, there is also the “in-principle” question of harm to the Green Belt, as set out in the National Planning Policy Framework (NPPF) 2012 (paragraphs 14 and 47). In paragraph 14, it is stated that plans should meet need, unless specific policies (footnote 8 specifically refers to Green Belt) indicate development should be restrained. In addition, paragraph 47 states that plans should meet need, “in so far as this is consistent with the policies in the NPPF.”
23. Taking into account the NPPF policy and the above factors, it is clear that the site should not be allocated for housing in the Draft Local Plan. In response to Question 34, both the Parish Council and CPREH have argued consistently that exceptional circumstances do not exist for the release of this site from the Green Belt.
24. These views have been further strengthened by the changes which have occurred since the publication of the Draft Local Plan in 2016. The principal local event has been the appeal decision to allow housing development on the Entech site (Reference APP/C1950/W/17/3190821). From the recent site allocations consultation, it is clear that the Borough Council consider that this should be counted as a “windfall” site. In the view of the Parish Council and CPREH, it should be included as part of the housing provision.

25. The EnTech development, currently under construction, includes 72 dwellings. If that figure were to be added to sites WE 100 (34 dwellings) and HS15 (150 dwellings), it would produce a total of 256 dwellings, a rise of over 40% compared to the 2011 Census. It is telling that the Inspector, in the EnTech appeal decision, considered that the allocation of HS 15 would result in the over-development of Woolmer Green.
26. The Parish Council and CPREH are sceptical about the suggestion in Table 11 of the landscape buffer along the northern boundary of the site. As explained in paragraph 17 above, the essential character of the area to the east of the B197 is that of open and rolling agricultural land, with wide vistas. Most of the site consists of high grade arable land, used for the growing of high yield crops. National policy in the NPPF (paragraph 170) supports the protection of soils and higher grade agricultural land (footnote 53). In the changing circumstances relating to the climate emergency and the coronavirus crisis, the protection of good quality land is paramount for future food security.
27. In response to Questions 37 and 38, the proposed Green Belt boundary is not robust and would take even more best-quality agricultural land out of production. It would also adversely affect the openness of the Green Belt (Q39). In summary (Q40), the proposed new boundary would be far inferior to the existing one, which is well-established and well-defined.

#### **Matter 6 – Implementation (Question 41)**

28. CPREH and the Parish Council have no comments to make on this question.

Jed Griffiths MA DipTP FRTPI

Hertford

18<sup>th</sup> April 2020