

Woolmer Green Parish Council's response to Welwyn Hatfield Borough Council's Draft Local Plan consultation, September/October 2016.

Woolmer Green Parish Council does not consider the draft Local Plan is sound with regard to Woolmer Green when it prioritises Green Belt development before Brownfield and designates a disproportionate amount of land for employment in the village.

Spatial Vision, Paragraph 3.2.

The choices made for Woolmer Green are not in line with the Spatial Vision which states that "limited development will take place within and around villages". The 150 dwellings proposed for Woolmer Green represents a 25% increase in the size of the village and it would be unjust to describe this as "limited". In fact Woolmer Green will increase by 46% by 2032 unless the policies relating to Woolmer Green in the draft Local Plan are changed, and this is unreasonable.

In calculating the number of houses required in the Borough has any consideration been given to the change in work patterns? Numbers working from home has increased significantly in recent years and as congestion increases so will home working. Flexible working could result in people not having to live in Hertfordshire or so near to London in the future.

Woolmer Green,

Paragraph 16.1.

The reference to "small employment area" should be described consistently and in context. It is a large employment area for a small village covering 15% of Woolmer Green. Paragraph 10.4 describes it as "a substantial area of employment".

Paragraph 16.2.

Woolmer Green community orchard was established in 2012 and is protected with a Deed of Dedication, along with the adjacent playground, as a Queen Elizabeth II Field in Trust.

Planning objectives should include:

Having regard to the Parish Council's local list of undesignated heritage assets to help preserve the few remaining older buildings in the village.

Encourage measures that would slow down traffic through the village in order to support a case for the introduction of a 30mph speed limit. Narrowing the road in 2014 went some way to doing this but did not reduce traffic speed significantly.

Woolmer Green and Economy.

Policy SADM 27 & Policy SADM 10

Green Belt Development

Contrary to NPPF 82 as "exceptional circumstances" do not exist that require 150 houses to be built on the Green Belt in Woolmer Green. There is an alternative Brownfield site available just yards from HS15 that has been put forward for consideration in the Local Plan that contains a dated factory housing just four employees. This site came forward after the first consultation in

2015 and the owners are progressing with plans to develop this into 75 houses, shops and employment units. Following the submission of the Brownfield site the Parish Council wrote to Welwyn Hatfield Planning to say that this provided the opportunity to relieve the housing pressure from Woolmer Green's Green Belt and this view is unanimously supported by the community. Community support was further demonstrated at a public meeting held on 12th October 2016.

The owners of a second previously developed site have also confirmed that their site will become available for development when there is a break in the lease and this will be within the period of the Plan. The owners will object to their site being designated for employment in the Local Plan as they intend to develop it into a minimum of 43 houses.

Green Belt development in Woolmer Green cannot be justified when there is previously developed land available. Core Principles contained in the NPPF state that planning authorities should "encourage the effective use of land by reusing land that has been previously developed" and to "promote mixed use developments". Developing the two brownfield sites would fulfil these principles.

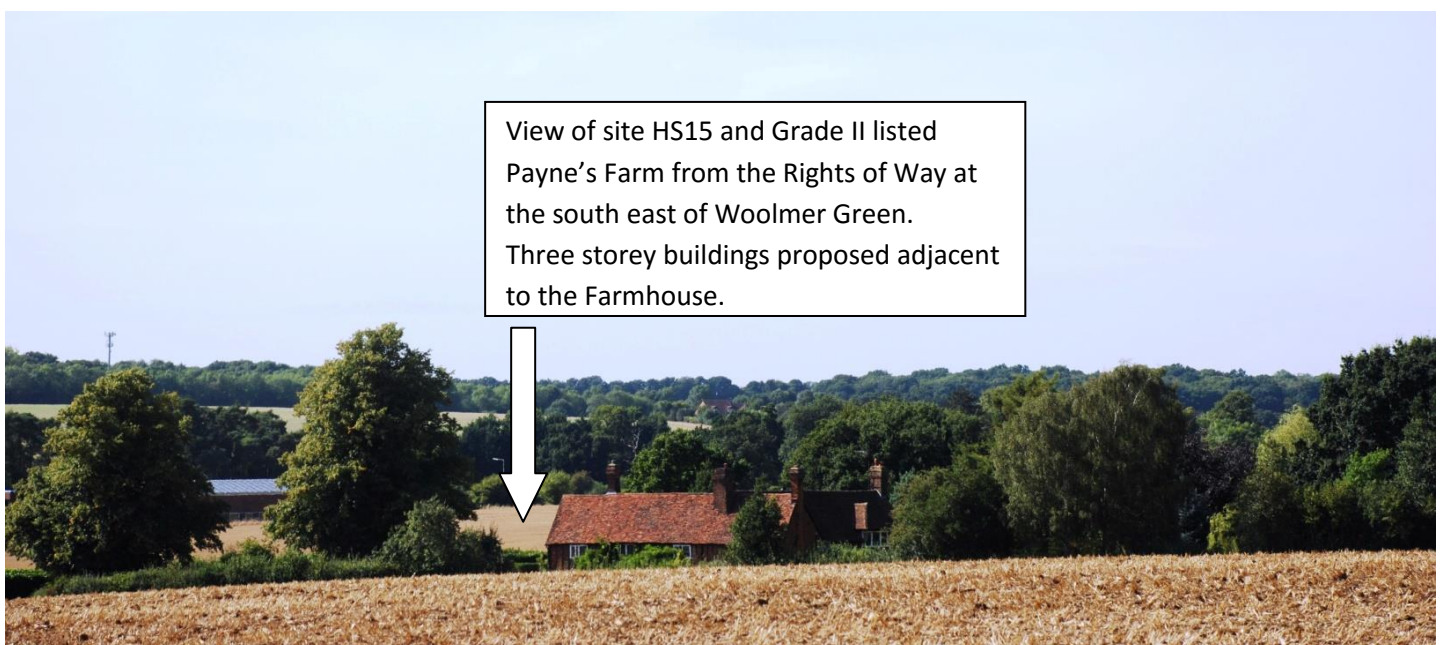
Green Belt site HS15

HS15 is part of the "fragile gap" of the one field that separates Woolmer Green from Knebworth. It is not necessary to erode this when there are brownfield alternatives.

The landscape around Woolmer Green is open and undulating and this distinctive character would be lost with development at HS15 which makes a "significant contribution" to the Green Belt. The Sustainability Appraisal states that there would be "significant adverse effects" to local distinctiveness and the historic environment if it were developed.

Woolmer Green is situated on a slope therefore HS15 is visible from all the Rights of Way to the south east of Woolmer Green. This is the main area for walking and any development would spoil people's enjoyment of the countryside and diminish quality of life.

It is not possible to mitigate the impact of development in the setting of the listed Payne's Farm as the area is clearly visible from the village's elevated south east Rights of Way. In the initial master plan three storey buildings are proposed on the lower ground adjacent to Paynes Farm and directly behind properties in Garden Road. These will be imposing and dominate the landscape from all surrounding vantage points.



New Road, adjacent to HS15 and Payne's Farm, has a history of flooding. HS15 slopes down to New Road and developing this site would cause more serious flooding issues. Historically this area has contained a pond but now a large ditch acts as a soak away.



Flooding in New Road adjacent to Payne's Farm during the 1980s and in 2014

HS15 is productive agricultural land. It is not necessary to lose this when a Brownfield site is available.

Employment site E10

The employment areas designated E10 contains four businesses. The central east side is a national car dealership, the north east area is occupied by a family run chocolate factory with shop and a stone cutting business supplying natural stone products. The north west area is an engineering company (Entech) that has declined.

North west area of E10 (Entech).

The owners of this underused Brownfield site put forward the land for consideration in the Local Plan and propose 75 houses, shops, including a convenience store, with employment space above but this has been rejected by the Planning Authority which has designated it for employment.

At present the site contains a large factory housing just four employees and the site is already screened by mature trees that would mitigate the visual impact of development.

The factory needs complete refurbishment or redevelopment in order to make the site suitable for large scale business use. Sufficient investment is not likely to come forward when there are business/warehouse units readily available in Stevenage just 4 miles away with direct access to the A1M.

The Government has made it easier for underused employment sites to be used for housing and has stated that it is a priority to ensure that there is "as much use as possible of brownfield land in driving up housing supply". Developing the north west employment site for mixed use would not only provide housing but would include small office units, appropriate for a village location, which would provide jobs. The shops proposed here would provide an increase in services for residents and offers a realistic opportunity for a convenience store.

Central east area of E10.

The owners of a second previously developed site have confirmed that their site will become available for development within the Plan period that could accommodate at least 43 homes. They have stated that the site is not a suitable location for a car dealership and that the site will not attract a similar business. This portion of E10 has been designated employment land in the Local Plan. This site is situated amongst residential housing on both sides and opposite and the current business on this site causes many problems to the community. Subsequently, this key central location is proven to be unsuitable for business use and the village would be significantly enhanced by placing an attractive housing development here. There is also an opportunity to introduce sustainable shops that would be easily accessible on the main road. Redevelopment for residential use would benefit the character and appearance of the site and the amenity of neighbouring residents therefore it is not suitable as an employment area.

Convenience store in Woolmer Green

Woolmer Green has few facilities and desperately needs a convenience store but the "farm shop" proposed on the HS15 site would not be at all visible from the B197, it could not take advantage of passing trade and would therefore not be a sustainable business. Once the land has been sold to a developer it is unlikely a shop will remain in the plan as it will be non-viable.

Developing the north west Brownfield site would provide a convenience store that has a prominent position on the main road, is easily accessible to the passing evening northbound trade on the B197 that it would need to ensure its sustainability. The owner of this site has initiated interest from a retailer interested in running the store so that delaying the development while the land is marketed for business could jeopardise this real opportunity.

Allocation of Business Land in Woolmer Green.

Traditionally the village has been a "working village", as described in paragraph 16.2, due to its location on the old Great North Road (A1) but this is a dated concept. Since the construction and completion of the A1M businesses no longer favour locating to Woolmer Green and, apart from some turnover in small retailers, no sizable business has moved into Woolmer Green in the last 30 years, despite employment land becoming available on a number of occasions.

The village has grown by over 50% since 1990 with the construction of at least 217 new homes mainly due to businesses moving out:

- Redland Aggregates now 120 houses at Carvers Croft & Mardleybury Road.
- Warehouse now 8 houses at Strawplaiters Close.
- Wickfield petrol station now 7 houses at Wickfield.
- Springate Engineering now 15 dwellings at Wolves Mere & London Road.
- Weatherheads agricultural machinery now 56 houses/flats at Twin Foxes.
- Benzidine Printers now 6 dwellings at Kimpton Court.
- Petit Forrestier van hire now a 61 bed care home.

There is every reason to believe this trend will continue.

Four sizable employment sites remain and they are to be protected in the Local Plan. The methodology as applied to Woolmer Green of designating a large proportion; 15% of the land in a small village, for employment is unreasonable.

This is not sustainable and cannot be justified as if and when these sites become available it is unlikely they will attract a big investor; this has not happened in the recent past and it will not happen in the future.

The neighbouring villages of Oaklands and Knebworth which are also situated on the B197 have also seen the few larger businesses located there leave and the small sites developed into housing.

Larger businesses favour sustainable locations in towns where they can operate alongside other businesses and are close to a range of facilities. They will not want to be isolated in a small village with no facilities.

Business needs to have access to good transport links and direct access to the A1M exists in all the nearby towns of Stevenage, Hitchin, Welwyn Garden City and Hatfield. Woolmer Green is relatively close to the A1M however the next village of Knebworth, which has parking on both sides of its high street, is a bottleneck where there are constant hold ups. Large vehicles such as buses and lorries can only pass through in single file through that village.

The owners of two of the E10 sites are objecting to the employment designation of their land and will progress with plans to develop the sites into housing/mixed use. Therefore "maintaining the provision of employment land" and the policy of designating "a substantial area of employment" in Woolmer Green is undeliverable.

Small scale business units would be more appropriate to the modern day and Woolmer Green's "vitality" and "viability" would be better enhanced if it had a convenience store and facilities that would benefit residents and provide appropriate jobs.

Motor sales/show rooms.

Paragraph 10.15 states there is "demand for motor sales/show rooms" and that "the environmental impacts in terms of traffic and associated noise" would make this use most suitable for employment areas. There is a conflict here as Woolmer Green is primarily a rural village and yet the Local Plan proposes it is also to become a "substantial area of employment" so presumably is considered suitable as a location for this type of use.

The area in the centre of the village that is part of employment land E10 is already a large motor sales/showroom and experience shows that this use is not suitable in areas where they have to operate in close proximity to residential neighbours. In Woolmer Green there are issues of large car transport lorries (often three at once) blocking neighbours driveways, parking on yellow lines and dangerously mounting the pavement, no parking for staff who have to be accommodated by the Parish Council in the village hall car park, irresponsible parking by staff in residential roads leading to altercations with residents, irresponsible parking by customers on pavements and operations on the site that adversely impact the everyday lives of residents. Large companies often pay scant regard to local people. Woolmer Green is primarily a village where people live and not an employment area; when this site becomes available at the break of the lease it would be wholly unsuitable for large scale business operations. Therefore this site, strategically located in the very centre of the village, should not be designated as an employment area but used for future housing growth. This site will come forward in either 2021 or 2026 and this will be a great opportunity to considerably improve the appearance of Woolmer Green and this approach has the unanimous support of residents.

Alternative Employment Land.

Paragraph 10.8 states "A case study in the Central Hertfordshire Employment Land Review, November 2006, showed how effective some existing small business units on a farm (in) Woolmer Green were at providing useful services and employment for local people." Woolmer Green Parish Council agrees with this analysis which refers to small business units. Small scale business is suitable for "relatively rural" locations. The paragraph also states that "it is important that this part of the local economy can continue" so why are the "business units on a farm (in) Woolmer Green" not designated employment land? Some barns here are grade II listed and it would be difficult to adapt them for any other use and, although Mardlebury Farm is in the Green Belt, designating it as employment land would be justifiable and appropriate and in line with policy SP 8.

The Future of Woolmer Green.

Under the Local Plan Woolmer Green has been allocated 150 houses on Green Belt land and an available Brownfield site has been designated as part of an employment area. This document has explained why allocating large employment areas in the village is unsustainable, unrealistic, unjustifiable and undeliverable. Any employment land that is available now or becomes available in the future may be required to market the site for three years for business use before a lack of demand is demonstrated. In that time the Green Belt at H15 could have been granted permission to build 150 houses. In three years' time the Brownfield site will have failed to attract an investor and 75 houses will be built there. Sometime after 2021 a second brownfield site will be in the same position and 43-50 houses will be built there. By 2032 Woolmer Green will end up with far more than its allocation of housing; 275 houses equating to (46% growth) putting further strain on infrastructure and negatively impacting resident's lives.

A 46% growth in housing could not be supported by the local primary school, which has doubled in size in the last 6 years and cannot expand further. If children have to travel to school outside the village traffic on the B197 will increase.

The B197 through Woolmer Green is the only available overflow for the A1M and there are no plans to widen the motorway. Commuting through the village will escalate as motorists increasingly choose to avoid the particularly congested junctions 6 to 8 of the A1M. If the village grows by 46% there will be considerably more vehicles adding to the problem and pollution will increase and have a detrimental impact on the health and quality of life of Woolmer Green residents, including children attending the primary school situated on the main road.

In conclusion "exceptional circumstances" do not exist to re-define the Green Belt in Woolmer Green.

Developing the Green Belt cannot be justified when there is proven capacity to build at least 125 houses on Brownfield land, which is a reasonable alternative, during the period of the Local Plan.

Environmental Assets – Heritage

Paragraph 12.34 & 12.35, Policy SADM 15

There is no clear reference to non-designated heritage assets that make a significant contribution to the historic environment but do not meet the strict criteria for national designation or remain undiscovered. Historic England has published advice for the

establishment and management of local lists and recommends "that as a minimum a local authority has established criteria for identifying non-designated heritage assets." These assets need to be identified at the pre-application stage of the planning process in order for their significance to influence any submitted proposals.

Following the demolition of an historic building with statutory listing potential in Woolmer Green the Parish Council has embarked on producing its own local list of historic buildings in the village as Welwyn Hatfield Borough Council does not have one for the Borough. The Parish Council looks to its local planning authority to encourage community engagement and recognise the value placed by local people on their historic environment. Local lists are a material planning consideration; therefore there should be policies that reflect this in the Local Plan.

Woolmer Green Parish Council does wish to take part and speak at the examination hearing.