## Woolmer Green Parish Council June 2019

Response to the Call for Sites Consultation

Welwyn Hatfield Borough Council (7<sup>th</sup> May 2019)

Prepared for the Parish Council by Jed Griffiths MA DipTP FRTPI

## **FOREWORD**

This report has been prepared for Woolmer Green Parish Council by Jed Griffiths MA DipTP FRTPI in response to the Call for Sites consultation, published by Welwyn Hatfield Borough Council on 7<sup>th</sup> May 2019. The views set out in the document are also supported by Knebworth Parish Council.

The Submission Local Plan assumes that most development will be directed towards the towns in the Borough. Paragraph 6.4 of the draft Local Plan states that there will be "more limited development in the large and small exclude villages and settlements." In the context of that statement and the current call for sites, the Parish Council notes that, at the time of writing, 72 dwellings are under construction in Woolmer Green on the former Entech site. Therefore, in the parish, there is already potential for an additional 222 dwellings, a 37% increase.

Proposals to develop Green Belt land do not meet the "exceptional circumstances" required by the NPPF (paragraphs 136/137). The Borough Council have not "examined fully all other reasonable options for meeting its identified need for development" and has not demonstrated that "makes as much use as possible of suitable brown field sites and underutilised land." In Woolmer Green, the Parish Council maintains that the previously-developed areas of Entech and Marshalls would provide sufficient land for "limited development". Therefore the local Green Belt can be fully protected.

In the context of the current call for sites, the Parish Council would wish to point out that the Borough Council originally refused the application for housing on the Entech site as it had allocated it for employment in the draft Local Plan. It had argued that developing Entech and the site WGr1 (HS15) would "result in the disproportionate growth of Woolmer Green." In other words, the addition of 222 dwellings would be disproportionate. It follows, therefore, that the development of sites WGr3 and WGr7/7a would also result in disproportionate growth of the village.

In this report, the problems associated with increased traffic are set out. There would also be problems of capacity for commuters at the railway stations at Knebworth and Welwyn North. There would also be considerable pressures on local infrastructure, such as schools and health facilities. The residents of Woolmer Green, Knebworth, and Codicote all rely on surgeries at Welwyn and Knebworth, which are already at capacity.

## Site WGr3: Land Adjacent to 52 London Road, Woolmer Green

The site (1.3 hectares) lies between the East Coast main railway line and the Great North Road (B197). Its estimated capacity is 40 dwellings.

The area consists of open grassland, bordered by mature trees. The northern extremity of the site forms both the settlement boundary of Knebworth, and the administrative boundary between Welwyn Hatfield Borough and North Hertfordshire District.

The site was previously assessed as part of the HELA 2016, but was not allocated for development in the Submission Local Plan. The Parish Council has consistently objected to the release of the land from the Green Belt, supported by Knebworth Parish Council. The main reason is that it occupies a critical position in the strategic gap which separates Woolmer Green from Knebworth. Its loss would lead to a creeping ribbon development along the line of the Great North Road.

This conclusion was endorsed by the Borough Council in the Sustainability Appraisal 2016. It stated that:

"A new Green Belt boundary would be weaker than the existing boundary and the development of the site would significantly reduce the existing fragile Green belt gap between the villages, which is considered to outweigh the social and economic benefits of the site."

Access to the site would be from the Great North Road, which is already at capacity in the peak hours, with no plans for improvement. The addition of 40 dwellings at this point would lead to further congestion and traffic conflicts. There are regular occurrences when the A1(M) between Stevenage and Welwyn is blocked. In those circumstances, long distance traffic is diverted via the B197, causing further disruption. To the north, there is chronic congestion in the town centre of Knebworth, which can only be exacerbated by further housing developments.

To the west of the site, the East Coast railway is used by high speed trains at frequent intervals. At such proximity, the site would be unsuitable for housing.

The Parish Council is mindful of the current position on the North Hertfordshire Local Plan which has been under examination. From the Inspector's draft report, it appears that four sites on the edge of Knebworth would be released from the Green Belt for housing. The addition of any sites to the south in Woolmer Green would only serve to increase the pressures on the local highways network and facilities and services.

In the Green Belt Study Stage 3, the site lies within assessment parcel P3. The assessment of harm for the whole area was "very high", which was endorsed by the Parish Council in its response to the study report. Clearly, the point about the significance of the gap between Woolmer Green and Knebworth was supported.

Analysis was also extended to two other scenarios. In scenario P3a, the release of site WGr3 was assessed together with site WGr2 to the south. Here the harm rating was "high". The northern part of what was then Site WGr3 was also assessed separately as scenario P3b, with a harm rating of "moderate". The Parish Council notes these sub-assessments, but considers that the fragmentation of the area into smaller parcels would only lead to the gradual erosion of the whole of parcel P1 and ribbon development along the B197.