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Your ref

Dear Planning Policy Team

Welwyn Hatfield Borough Council: Local Plan Consultation:

Representations on behalf of Mariposa - Former Panshanger Aerodrome Site (WGC4)

Nathaniel Lichfield & Partners (NLP) acts as agents on behalf of Mariposa Investments Limited ('Mariposa') in respect of the Former Panshanger Aerodrome Site (Site WGC4). This letter and the two accompanying documents, outlined below, comprise our formal submission in respect of the Local Plan Consultation document (January 2015) and Infrastructure Delivery Plan:

- Key Issues Report (March 2015) prepared by Nathaniel Lichfield & Partners;
- Masterplan Scenarios Document (March 2015) prepared by Nathaniel Lichfield & Partners;

Ongoing discussions are being held with the Homes and Communities Agency (HCA), owners of the adjacent site forming part of WGC4, and Mariposa intends to work closely with the HCA going forward. However, it should be noted that these representations are submitted solely on behalf of Mariposa, and not the HCA.

Part 1 Strategic Policies

Paragraph 3.3

Mariposa supports Welwyn Hatfield Borough Council's (WHBC) intention to meet the full objectively assessed need for housing as outlined at Para 3.3.

Paragraph 3.6

Mariposa supports WHBC's approach to identifying new homes as set out in Para 3.6 and in particular the acknowledgement that sites outside the urban areas, such as the safeguarded Former Panshanger Aerodrome, will be necessary to meet housing need. In this regard we would note that, whilst WHBC has identified that exceptional circumstances exist to review the existing boundaries of the Green Belt, the Former Panshanger Aerodrome Site provides the only



opportunity to deliver housing on land that is not currently located within the Green Belt outside of urban areas. As a result, ensuring the optimum delivery of housing on this site should be prioritised ahead of the release of Green Belt land for development. This said, we suggest below that there are some good reasons to consider a minor revision to the boundary.

Policy Intention CS4 (Green Belt and Safeguarded Land)

The current northern boundary of the WGC4 site is a straight line across the site, reflecting the Green Belt boundary. Guidance in paragraph 83 of the NPPF confirms that when undertaking a review of Green Belt boundaries, authorities should consider them having regard to their intended permanence in the long term, so they should be capable of enduring beyond the plan period. In paragraph 84 it advises that when reviewing boundaries local planning authorities should take into account the need to promote sustainable patterns of development. Paragraph 85 states that boundaries should be defined “clearly, using physical features that are readily recognisable and likely to be permanent”.

The current Green Belt boundary appears arbitrary, being a straight line not reflective of land ownership or physical features. As such it does not reflect the guidance in NPPF and this compromises the strength of the boundary in terms of its clarity and permanence.

There are other good reasons to consider a minor revision to the Green Belt boundary in this location. In exploring the feasibility of providing the aerodrome on site, it is clear that land in the Green Belt would be needed, and therefore the release of that land should be considered (in that scenario) to ensure the required buildings and structures such as car parking areas could be delivered.

Should it transpire that the aerodrome is not feasible; the straight line boundary also has a detrimental effect on the ability of the site as a whole to be properly masterplanned, affecting the design of individual development plots and unduly constraining the capacity of the site. Adjusting the boundary to address this would not mean that development would then be hard up against that boundary. To the contrary, having a larger area excluded from the Green Belt would enable the scope and flexibility to identify the appropriate extent and form of built development along the northern edge to ‘soften’ the impact of development whilst maximising the potential of the site to accommodate much needed new housing. The extent of the built form could be agreed, in discussion with the Council and having regard to more detailed visual impact analysis and discussions with key stakeholders.

The Local Plan Consultation Document identifies that other sites within the Green Belt will need to be entirely released to necessitate the delivery of housing whereas on the WGC4 site there would only be a requirement to alter the boundary by a relatively small amount to enable the provision of a more suitable scheme.

For these reasons, we consider that a review of the Green belt boundary at this location is necessary and that it should be amended to accord with the site boundary shown on Masterplan Scenario 3 in our Masterplan Scenario Document. This is a readily recognisable boundary which is defined by physical features.



New Policy Intention (Movement)

Mariposa supports WHBC's intention to provide improved opportunities for travelling by public transport, walking and cycling through the location and development of sites and the delivery of new infrastructure.

Paragraph 8.2

We request that the comments made about the Former Panshanger Aerodrome itself are presented in the context of the information previously provided to the Council, namely that the aerodrome is closed – and has been for 6 months. We understand that the North London Flying School has relocated to Elstree Aerodrome and that all owners have made alternative arrangements to park their planes. Development at the site would not, therefore, result in the 'loss' of an existing facility. There is currently no compelling evidence that we are aware of that there is a demand or a need for an aerodrome at this location.

Part 2 Sites

WGC4 "Former" Panshanger Aerodrome

We can confirm Mariposa's support for the identification of the WGC4 site as more favourable for housing and the significant contribution that it could make to meeting the assessed need for housing in the Borough in the period to 2031. The supporting information, outlined in the submitted Masterplan Scenario Document, confirms that the site is not constrained and is 'deliverable'. There are also potential benefits of the development of the site which are identified but which would be worked up in consultation with the Council, stakeholders and the local community.

We note the requirement to explore the feasibility of re-providing the aerodrome, and have commenced that work. There are a number of reasons why such re-provision may not prove feasible or desirable (see our Key Issues report paragraphs 2.20 onwards, for example). It is therefore important that any future policy should confirm that the entire site is suitable for housing should the aerodrome not be feasible.

We identify additional comments and corrections to the text provided in the Local Plan Consultation document:

WGC4 – As outlined above the aerodrome is now closed and as such the WGC4 Site Policy should be renamed to read WGC4 **Former** Panshanger Aerodrome. The other instances in the document where this text should be altered are Paragraph 3.6, Paragraph 10.17, Site GTLAA06 and Table 5.

Table 5 – This currently identifies the WGC4 allocation as being a Green Belt site for consultation. Notwithstanding our earlier comments regarding the Green Belt boundary, site WGC4 as shown in the consultation document is not located within the Green Belt and as such should be classified as a "large urban site" and moved to the section above in the table.



Infrastructure Delivery Plan

Mariposa support the principle of delivering appropriate infrastructure across Welwyn Hatfield but recognise that greater clarity is needed in respect of the infrastructure required for individual sites and this should be developed in line with Local Plan.

Summary

Mariposa welcomes the opportunity to be involved with the emerging Local Plan and is broadly supportive of the aims and objectives it seeks to fulfil. Mariposa fully supports the identification of the former Panshanger Aerodrome as a more favourable site for residential development, subject to the comments made in the letter and looks forward to working with the Council to develop and deliver these proposals.

We trust that these representations are useful to officers in progressing the Local Plan. If you have any questions regarding the contents of this letter, or the enclosures, please do not hesitate to contact me or my colleague Daniel Di-Lieto.

Yours sincerely,



Ruth Ambrose
Planning Director

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