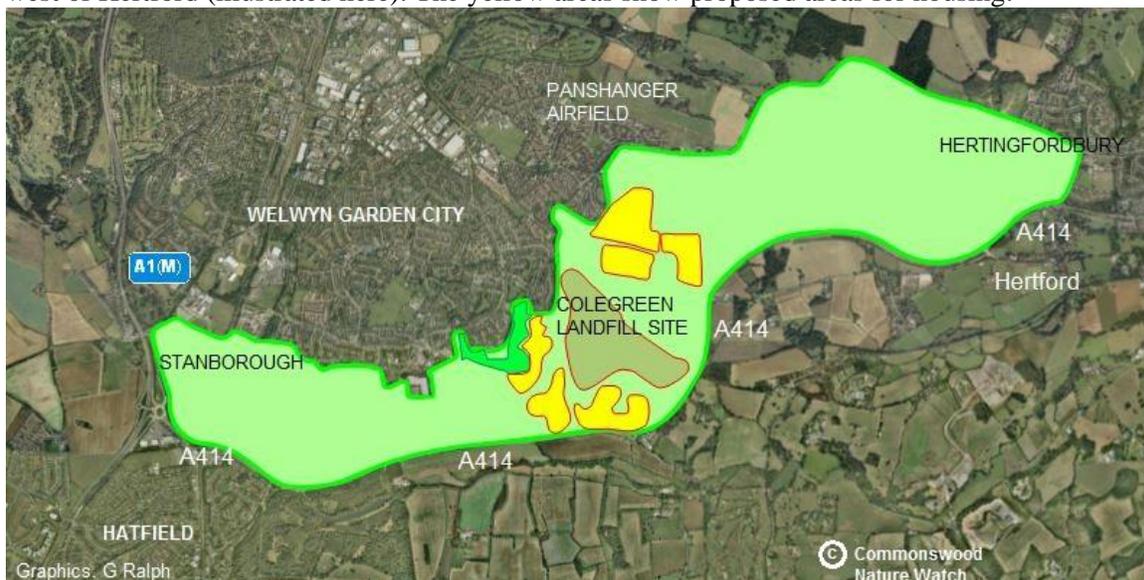


Strategic Green Corridor

This response to Welwyn Hatfield Local Plan consultation and is supported by:

The Friends of Panshanger Park, Hertingfordbury Parish Council, Welwyn Garden City Society and local residents Peter Oakenfull, David Farmer, Will Davis and Gary O'Leary.

The Strategic Green Corridor (SGC) in this response is defined as: the land corridor east of A1; north of A414; south of Welwyn Garden City, both west and east; around Panshanger Park and west of Hertford (illustrated here). The yellow areas show proposed areas for housing.



This response summarises a range of issues which flow from the promotion of single or multiple housing sites (by Welwyn Hatfield Borough Council and East Herts District Council) within this SGC. It deals with the issues of:

- 1.1 Overall functions of the Strategic Green Corridor
- 1.2 Housing Numbers
- 1.3 Green Belt
- 1.4 Critical Wildlife Corridors
- 1.5 The Setting of Heritage Assets.
- 1.6 Impacts on an original Garden City (WGC) and the Garden City ethos

1.1 Overall Function of SGC

The SGC fulfills the following key purposes:

- It provides an accessible, green environment that delivers valuable benefits to community and providing a restriction to uncontrolled 'sprawl' development.
- It safeguards coalescence between the larger settlements of Hertford, Welwyn Garden City & Hatfield and provides for permanent separation.

- It protects existing green space and provides increased public access to and linkages through open countryside.
- It provides a regime of environmental protection for the River Mimram and River Lea valleys preserving archaeological sites of significance and historic settings.
- It provides some of the richest range of local habitat for specific species and a well-connected corridors between a number of wildlife sites. This connectivity is vital to ensure a thriving range of species and habitats.
- It ensures the preservation of the settings of heritage assets within the Green Corridor, sites such as Panshanger Park a Grade II* English Heritage listed landscape and the Hatfield Estate a Grade I English Heritage landscape
- It provides a vital role in the function of Welwyn Garden City as a Garden City.

1.2 Housing Numbers

Welwyn Hatfield BC has assessed future housing needs whilst ignoring National Planning Policy Framework (NPPF) policy on the setting of housing targets. The NPPF states that targets must take into account constraints on development such as Green Belt, which is a high proportion of the borough. The Welwyn Hatfield local plan housing projections must be reassessed or it is at risk of being found unsound when published and tested.

Over-inflated housing targets create a situation where more sites are selected for development than would be the case if NPPF policy guidelines on constraints were followed. A reduction in housing targets would allow sites within SGC to be removed from future housing plans.

1.3 Green Belt

On 6th October 2014 the Government's Department for Communities and Local Government's Secretary of State, Eric Pickles and his Minister, Brandon Lewis, in a press release entitled 'Councils must protect our Green Belt' reiterated that "*Ministers have underlined the Government's commitment to protect the Green Belt from development*". The "*new guidance...reaffirms how councils should use their Local Plan drawing on protections in the National Planning Policy Framework (NPPF) to safeguard their local areas against urban sprawl and protect the green lungs around towns and cities*".

At a time when Welwyn Hatfield Borough Council are proposing to declassify parts of its Green Belt in order to build on it, the Secretary of State explains "*This government has been very clear that when planning for new buildings, protecting our Green Belt must be paramount*". In this recent "*new guidance*", the Government poses the question, "*Do housing and economic needs override constraints on the use of land such as Green Belt?*" and answers it by saying that, "*need alone is not the only factor to be considered when drawing up a Local Plan,*" and that, "*Green Belt boundaries should only be altered in exceptional circumstances*", citing paragraph 83 of the NPPF, where two of the restraints to development are *designated heritage assets* and *Green Belt*, both of which apply to the SGC.

The WHBC plan to declassify parts of its Green Belt for building purposes does not meet the criteria of "*in exceptional circumstances*". The lack of consideration of Green Belt restraints leaves the WHBC plan at risk of rejection when tested. We also note the concern of CPRE about the risk of loss of Green Belt land in Hertfordshire and their indication that they are willing to challenge this. We call on WHBC to withdraw its proposals to declassify Green Belt within the SGC.

1.4 A Critical Wildlife Corridor

The WHBC proposed plan for sites within the SGC will block a crucially important wildlife corridor between Stanborough and Hertford. Some of the counties most important wildlife habitats exist on undisturbed land across this corridor. In particular at sites such as the Cole Green landfill and Panshanger Airfield as well as the The Commons nature reserve and its surrounds. The natural form of the Lea and Mimram valleys have maintained this undisturbed status for centuries.

The National Planning Policy Framework (NPPF) embeds protection policies for wildlife sites including local wildlife sites. Planners must recognise the important contribution these sites make to wider ecological networks. There is little evidence that the necessary studies have been completed to assess the potential loss and protection needed for sites across the SGC.

In Professor Lawton's DEFRA commissioned report, 'Making Space for Nature' 2010, he states that, *"There is compelling evidence that England's collection of wildlife sites are generally too small and too isolated, leading to declines in many of England's characteristic species..."* and that, *"A new type of Environmental Stewardship scheme is needed, particularly to help buffer sites and establish stepping stones and ecological corridors"*.

In other words, he maintains that key wildlife corridors such as this SGC need protection and good stewardship, otherwise their ability to provide sustainable and diverse wildlife havens will be impaired and lost. Developments as proposed will block key ecological corridors for wildlife and significantly impact species diversity and sustainability.

1.5 The Setting of Heritage Assets

Paragraph 12 of the NPPF deals with 'Conserving and enhancing the historic environment'. It requires that local planning authorities take particular consideration of development proposals that could affect the historic environment and heritage assets. It sets out core principles. In particular, we expand on the core principles 10, 7 and 5 which state that planning should:

"- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- contribute to conserving and enhancing the natural environment and reducing pollution.
Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognizing the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;"

We note that the WHBC plan adopts national policy.

English Heritage recognises fifteen Grade Two Parks in the District of East Hertfordshire. Only three are Grade II* rated Historic Parks and the largest of these is Panshanger Park. It is also the nearest to the centres of population of Welwyn Garden City and Hertford and the richest in wildlife.

We suggest that the significance of Panshanger Country Park has not been considered by WHBC in selecting proposed development areas adjacent to the park and within its setting, specifically the proposed development of WGC4 and its proximity to Panshanger Country Park.

Paragraph 12 of the NPPF deals with '*Conserving and enhancing the historic environment*'. It requires that local planning authorities take particular consideration of development proposals that could affect the historic environment and heritage assets: paragraph 12 "*...they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance*"

We suggest that WHBC has not assessed the impact of development at WGC4 on the setting of Panshanger Park as a Grade II* listed Park. Paragraphs 129 and 132 of NPPF detail requirements for local planning authorities in plan-making and development in this area: paragraph 129 '*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise*'

NPPF goes further to stress the importance of conservation of heritage assets and their setting and the importance of protecting heritage assets of the highest significance: paragraph 132 '*Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting..... Substantial harm to or loss of designated heritage assets of the highest significance, notably grade I and II* registered parks and gardens.....should be wholly exceptional.*'

NPPF para 141 outlines requirements for the developer and for the local planning authority to make detailed assessments of the impact of development on significant heritage assets and the setting of those assets. This information should be available for public examination as part of the Plan making process. Para 141. '*Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible...*' No evidence has been presented by WHBC or developers regarding the significance of Panshanger Park and the potential affects of development on its setting.

Panshanger Park is evolving as the Country Park as it is finally opened to the people of Hertfordshire. This is increasing the significance of this historic place. How it is used and experienced in its historic context will have great importance to local people and visitors from further afield.

To repeat the core NPPF planning principle could not be truer in this situation that planning should "*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*"

We will suggest the that the WHBC is flawed in this regard in relation to WGC4 and that this option for housing should be removed from the more favourable list as it cannot be delivered and would be rejected on Heritage grounds.

1.6 Impacts on an original Garden City (WGC) and the Garden City ethos.

The WHBC proposed Local Plan defines a settlement strategy which states explicitly that the **primary focus** for new development should be in and around Welwyn Garden City and Hatfield.

Welwyn Garden City was the world's second Garden City built on the principle that specifically excluded the idea of adding suburb after suburb. The National Planning Policy Framework is clear on the garden city ethos and confirms its merit for town planning into the 21st century. The garden city approach has stood the test of time and has been adopted by governments and planners around the world. The proposed WHBC Local Plan being promoted in the current consultation fails to consider these important points. Garden City principles do not include building vast extensions on the periphery of the existing town and the creation of unsustainable urban sprawl.

The access, for Garden City residents, to and through surrounding open countryside and Green Belt and the restraint on its population growth ensures the continuing function of the Garden City for the resident and business population as a whole. A sprawling Welwyn Garden City to the East and South not only destroys the SGC but impacts severely the function of one of Hertfordshire's internationally-recognised towns. The NPPF principles should be adopted to underpin the unique identity of Welwyn Garden City. To fail to do this is to deny the important planning status of this Important Garden City, its unique history and its potential as a future model for planning.