

WeG4, Land at Marshmoor, Welham Green

Summary

1. This representation is submitted on behalf of Gascoyne Cecil Estates (the Estate), who are the owners of the land identified as WeG4b in the emerging Local Plan. They are working closely with the owners and promoters of the adjacent land, identified as WeG4a in the emerging Local Plan. This land is being promoted for a mixed use development including both residential and employment development. It is collectively referred to throughout these representations as the land at Marshmoor.
2. The Council have assessed the land at Marshmoor as being ‘finely balanced’, broadly for the following reasons:
 - Its development would prevent two sites identified as opportunities for providing Gypsy and Traveller accommodation from coming forward for that use.
 - The Council have assessed that the land at Marshmoor makes a significant contribution to the Green Belt purpose of preventing the countryside from encroachment, and a partial contribution to other purposes.
 - The Council are not yet certain whether the exceptional circumstances exist to justify the land’s removal from the Green Belt.
3. We consider these comments in the following representations. The Estate are keen to respond to the Council’s concerns, and have therefore commissioned specialist evidence to support these representations. This includes a Landscape and Visual Assessment by Gillespies, which comments on the site’s landscape character, sensitivity and capacity for development, as well its the contribution towards Green Belt purposes. In addition, Peter Brett Associates have been commissioned to consider the Council’s evidence in relation to emerging employment land, and provide an independent view on the need for the proposed development. These separate reports each accompany these representations.

Strategic Context

4. Welham Green has grown in recent years following the opening of the railway station in 1986. The village also has a range of shops, including a Post Office, butcher, baker, local stores, chemist, take-aways, pubs and services such as hairdressers and dry cleaners. The presence of these local shops and facilities imply that local residents can and do shop locally for convenience goods and services, reducing their need to travel by car.
5. The village accommodates a major employment area, at Traveller's Lane, on the western side of the railway line. This area benefits from excellent access to junction 2 of the A1(M) as well as its proximity to Welham Green railway station, which is located on the East Coast Main Line. This location has typically attracted storage and distribution businesses uses, such as Tesco. A full assessment of the site's accessibility by public transport is included within the accompanying Infrastructure Appraisal by WSP.

The Land at Marshmoor

6. The land at Marshmoor is located on the western edge of Welham Green, described in the emerging Local Plan as a medium sized village. The land is very well placed for new development, as it benefits from close proximity to Welham Green station, which provides a good service to local towns such as Hatfield and Welwyn Garden City, as well as to London and Cambridge.
7. The land at Marshmoor is located to the east of the railway line, and connected to the village by Dixon's Hill Road. It is also adjacent to the A1000 Great North Road, which provides a direct link to Hatfield to the north and the A1(M) to the west. It is thus well connected both by public transport and strategic road connections, making it suitable in principle for both residential and employment use.
8. The site proposed for development surrounds a caravan park, and is adjacent to existing housing on the A1000; the proposals have been designed with sensitivity to these existing uses, which would remain unaffected. The site includes land which is currently in agricultural use, grassland and some land in commercial and residential uses, closer to the A1000. It includes land being

promoted for residential development (identified by the Council in their emerging Local Plan and evidence base as WeG4a) and land being promoted for employment use (identified by the Council as WeG4b). The proposed Masterplan relates to both of these areas, and they are being promoted comprehensively for a single allocation, a fact reflected in Figure 43 of the current consultation document.

Green Belt Exceptional Circumstances

9. The Council has acknowledged that there is insufficient capacity for residential development within the Borough's existing urban areas to meet the need for housing, as identified in their Strategic Housing Market Assessment (SHMA). We have noted in our separate representations that we believe the need for housing is in fact greater than the SHMA estimates. In this context, we believe that the necessary exceptional circumstance exist to justify altering the Green Belt boundary.

10. Separate evidence has also been produce by Peter Brett Associates (PBA), which is discussed below. This demonstrates that there is a significant need for new high quality employment premises, on well-connected greenfield land such as this. We note that to date the Council have not received any alternative proposals of this type, and we believe that the need for this development also provides the necessary exceptional circumstances to justify the land's removal from the Green Belt.

Green Belt Assessment

11. As noted above, we are aware that the Council has concerns with regard to the sites' release from the Green Belt, because of its perception that this land makes a contribution towards the purposes of the Green Belt. The NPPF defines the five purposes for Green Belt land, at paragraph 80.

12. The Council have carried out their own assessment of the potential to release various development sites from the Green Belt, with an analysis of the contribution they make towards these five purposes. This is contained within the Green Belt Review, Stage 2. We believe that this assessment is flawed,

because it misinterprets the purposes above, and also because it introduces a new ‘local test’ and gives it the same weight as national policy.

- 13.** We have carried out our own Green Belt Assessment of the land at Marshmoor and its contribution towards the purposes of Green Belt land, and this is included as an Appendix to these representations. In addition, Gilespies’ Landscape and Visual Appraisal of the land at Marshmoor, includes a further independent consideration of the site’s contribution towards Green Belt purposes.
- 14.** To summarise, both we believe that the land at Marshmoor makes at most a partial contribution towards Green Belt purposes, including the Council’s own local purpose, as follows:

Green Belt Purpose	JBPA Assessment
To check the unrestricted sprawl of large built-up areas.	Limited or no contribution.
To prevent neighbouring towns merging into one another.	Partial - With regard to the visual separation of settlements.
To assist in safeguarding the countryside from encroachment.	Partial - The site is mixed in character and use, containing residential and commercial development, and not open in nature.
To preserve the setting and special character of historic towns.	Not relevant – The purpose relates to historic towns in a holistic way, and not individual heritage assets.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	None – There is insufficient urban land available to meet development needs.
Local purpose – To maintain the existing settlement pattern.	Partial - With regard to the visual separation of settlements.

- 15.** We believe that the Council’s Green Belt Assessment is flawed because it gives the same weight to their own local purpose as it does to the NPPF’s purposes of Green Belt land. We believe that this misinterprets the intention behind the original designation of Green Belt, which was to relate to macro, strategic issues, such as the ongoing expansion of major towns and cities; it

is no mistake that the NPPF's purposes do not refer to settlements or villages. These more local issues can suitably be controlled by local policies, and this is recognised by the NPPF at paragraph 82, where it requires local planning authorities to demonstrate the exceptional circumstances for placing land within a new Green Belt by demonstrating **'why normal planning and development management policies would not be adequate.'** We believe that typically when considering local issues relating to towns and villages merging, local policies will provide a suitable and effective level of constraint and guidance.

16. Our conclusion is that the site does not make a significant contribution towards any of the purposes of Green Belt land, or the Council's own local purpose. We also believe that the degree to which there would be any substantive effect on these purposes would depend on the form of any new development. We explain below that it is the Estate's intention that new development should be carefully Masterplanned, to provide a suitably robust new Green Belt boundary, and to minimise any impact on the Green Belt.
17. The Estate's proposal for a new Green Belt boundary is set out in our Drawing 1283/203, which accompanies this representation.

Landscape Appraisal

18. The Landscape and Visual Appraisal by Gillespies appraises the land at Marshmoor as follows:
 - The masterplan site is sandwiched between the A1000 and the railway line and is heavily influenced by urban fringe uses and by urban development to the west;
 - The existing fragmented land uses do not make a positive contribution to the local landscape character;
 - Views across the masterplan site towards the railway line and large scale commercial developments that form the urban edge of Welham Green, do not provide an attractive urban / rural transition or a positive setting for Hatfield House/Park;
 - Mature trees and hedgerows within and on the site boundaries screen views of much of the site from the wider landscape;

- The trees and hedgerows within and on the site boundaries screen views of much of the site from the wider landscape; and
- The fragmented eastern boundary is detrimental to the urban / rural transition.

19. From this appraisal, we believe that it is clear that the land at Marshmoor is currently heavily influenced by urban development and fragmentary in nature, and that it does not currently provide an entirely positive setting for Hatfield Park.

20. Gillespies then go on to consider the way in which the proposed development, as outlined on the Concept Masterplan, could affect these matters. They conclude that the key opportunities, expressed by the Concept Masterplan, are as follows:

- Retention of mature trees and hedgerows on the masterplan site boundaries to maintain screening and provide a mature backdrop for the development;
- Retention of mature trees and hedgerows within the masterplan site as a green framework to create an immediately mature setting for the development;
- Consistent landscape treatment along the eastern boundary, including significant areas of new woodland planting to improve the interface with Hatfield House/Park and the urban / rural transition;
- Significant areas of new woodland planting will screen existing unattractive views towards the railway line and large scale commercial development on the urban edge of Welham Green;
- Strong landscape boundary to the west between the existing access / pedestrian access and the railway line to screen the railway line from the new development, provide opportunities to restore the ecological value of the area and complete the verdant setting for the development; and
- A1000 and Dixons Hill Road have the potential to form a defensible Green Belt boundary.

21. Gillespies conclude as follows:

‘Although there would be some loss of openness it will be offset by improvements to the setting of Hatfield Park and to the transition between the urban areas of Hatfield and Welham Green and the rural landscape beyond. The loss of openness would have a negligible impact on the local landscape character as the site currently contributes little to the Hatfield Park LCA. The extensive woodland planting proposed for the eastern side of the masterplan site would reinforce some of the wooded characteristic of the LCA.’

22. We therefore believe that the proposed landscape-led approach to development can lead to benefits. We also believe that it can overcome the Council’s concerns regarding the way the new development would relate to the countryside and Hatfield Park.

The Need for Specialist Employment Premises

23. The accompanying report by Peter Brett Associates (PBA) explains that the Council’s Employment Land Review (ELR) has generally underestimated future employment potential within the Borough. It has also specifically failed to take proper account of the need for new premises for R&D development.
24. PBA note that this type of R&D development is a local priority, as identified in the Hertfordshire Strategic Employment Sites Study (2011) and the Strategic Economic Plan (2014). Despite this, they note that there is a very limited supply of suitable accommodation for this type of business. They explain that most vacant office or industrial accommodation will not meet their needs for flexibility, and that bespoke accommodation is generally required, in addition to the need for a high quality of environment mentioned above.
25. We are aware that there is currently a lot of vacant office stock on the market, which is generally of a poor quality, and much of it has lain vacant for some time, often for a number of years. Despite this, Gascoyne Cecil Estates have found over recent years that they are able to let various employment premises and at higher rental levels than are typical of the local market. This is thought to be because the standard of accommodation that they typically offer is far higher than is normal in the area. We believe that this

demonstrates that there is indeed a market for specialist employment premises, both of an R&D nature and also high quality office facilities. This illustrates that they are providing a product which is not generally available locally, and meeting a need which is not typically met by the local stock of employment premises. This clearly points to the need for new employment sites to meet current and future needs.

26. PBA conclude that:

- There is an acute under-provision of small, high quality B1(b) spaces.
- There is a market for this type of floorspace which is set to grow over the plan period.
- Many land owners will not develop the kind of R&D facilities required, because the low densities and high costs do not provide such an attractive return as more conventional development.
- Where they are available, this type of accommodation will commend relatively high rental values due to the high level of demand and low level of supply.

27. We believe that the need for these premises is substantial, and that the Council must embrace opportunities to meet this need, in order to plan positively.

The Need to Release Long-Term Vacant Employment Stock

28. The PBA report notes the presence of employment stock which has lain vacant for a long time, particularly poor quality office buildings. In response to the question raised by Policy Intention CS2B of the consultation document, we believe that this type of employment land should be released for other uses. This would stimulate change in the local market, and we believe that the removal of this stock would lead to an improvement in the perception of the local office stock in particular, which we understand is often seen as being of a poor quality. Retaining this stock and opting for a 'no change' approach by relying on it rather than allocating new sites will simply lead to stagnation and decline in the Borough's economic output over the course of the Plan period.

The Need for Housing

29. We have noted in our separate representations on the subject that there is a substantial and pressing need to provide housing in the Borough. The Council acknowledge in the consultation document that the level of housing proposed (10,152 dwellings, according to Table 1) is below the level of 'Objectively Assessed Need' for housing identified by their Strategic Housing Market Assessment (SHMA). We note in our representations that we believe the SHMA has substantially underestimated the level of housing required, and so the under-provision in the emerging Local Plan proposals is even greater.
30. The proposed housing at Marshmoor, which is expected to be in the region of 110 – 120 dwellings, would make a valuable contribution towards meeting housing needs. In the context of the high level of need for housing, it is clearly important for the Council to plan positively and identify opportunities to meet this need wherever such development would be acceptable.

Potential Sites for Gypsy and Traveller Accommodation

31. The consultation document identifies that allowing the proposed mixed use development to take place on the land at Marshmoor would imply that the proposals for Gypsy and Traveller pitches could not be accommodated. We believe that this land is uniquely well placed to meet the need for new employment premises, due to its location adjacent to a mainline railway station, proximity to the strategic highway network and the potential that it offers for a high quality landscaped environment.
32. In addition, PBA have noted that there is a shortage of land coming forward for this type of proposal, as it does not offer the type of return many land owners and investors are seeking. In this context, it is highly important that the Council grasps the opportunity for a business park on the land at Marshmoor.
33. The Estate have previously assisted the Council in identifying potential locations for Gypsy and Traveller accommodation, and they would be happy to discuss this matter further with the Council as required.

A Landscape-Led Masterplan

- 34.** We believe that it is clear from our comments above, and the accompanying detailed analysis, that the land at Marshmoor is entirely suitable in principle for development to meet current housing and employment needs. However, the form that the development would take is very important, for a number of reasons.
- 35.** Firstly, as noted above, the way that the Green Belt is addressed, and a new defensible boundary is presented, is of great importance to ensuring the permanence of the Green Belt. In the case of the land at Marshmoor, the Green Belt boundary is currently defined by the railway line, but a suitable alternative boundary exists at the A1000 Great North Road. This is acknowledged in the current consultation document.
- 36.** The form of the proposed development is also important in terms of its impact on the landscape, and its relationship with the adjacent Hatfield Park, a registered park and garden. We believe that the landscape-led approach to the Concept Masterplan would provide a suitable buffer between Hatfield Park and the detracting elements of the railway line and the Travellers Lane industrial estate beyond. The retention and enhancement of existing landscaping and substantial level of new tree planting would be important elements which would create a visual break and a suitable setting for the Park and the lodge building adjacent the A1000. These issues are also considered in detail in Gillespies' Landscape and Visual Appraisal, which concludes that the proposals would be entirely suitable in this regard.
- 37.** The form of development is also important if the proposed business park is to be a success. The Estate intend to provide a high quality business park, which would appeal to footloose businesses specialising in research and development and advanced engineering. The separate report by Peter Brett Associates which accompanies these representations notes that this type of business is not attracted by typical office (or industrial) premises, but it instead requires premises which are set within a high quality environment. They note that this market-led distinction is one of the reasons for the differentiation of B1(a) office and B1(b) R&D uses, due to their differing needs and characteristics.

- 38.** The Concept Masterplan has been designed with this in mind, and it is intended to create a landscaped environment, utilising new and existing landscape features to create an environment which would be set apart in type and quality from the vast majority of business sites in the local area. This is intended to help the site compete with other areas, such as on the fringes of London, Cambridge and Oxford, which will inevitably be competing for this type of development.

Highway Access

- 39.** These representations are accompanied by an Infrastructure Appraisal by WSP, which consider various issues relating to the site's delivery, including highway access. With regard to highway access, WSP have produced preliminary designs for the proposed amendment to the roundabout on the A1000 and Dixon's Hill Road, which would provide the primary vehicular access to the site. Further access points would be on the A1000 and Dixon's Hill Road.

Surface Water Management

- 40.** The land at Marshmoor lies outside the flood plain, and is considered to be at low risk of flooding from watercourses. However, the land is considered to be at some risk of flooding by surface water, particularly in the southern part of the site, where surface water appears to back up as it attempts to pass through a culvert at Dixon's Hill Road. The development proposals offer an opportunity to attenuate surface water within the site, and manage its release, to avoid flooding in the southern part of the site.
- 41.** The underlying geology implies that drainage by infiltration may be limited, particularly in the southern part of the site, and the development would make provision for suitable surface water drainage infrastructure, including swales and balancing ponds, to accommodate surface water runoff. Swales and measures such as permeable paving in car parking areas can also provide a degree of attenuation.
- 42.** Surface water would be attenuated within the site and would only be allowed to leave the site at the current greenfield runoff rates. This is necessary as

national policy requires that the proposals should not be allowed to increase the risk of flooding elsewhere. The development concept set out in this document has been prepared with this in mind.

- 43.** The provision of new surface water attenuation features will be integrated into the site's landscape, helping to create the attractive, high quality environment required for a successful business park.

Utilities

- 44.** Initial technical work carried out by WSP has established that there are no undue constraints on the site relating to the provision of services and utilities. All services, such as potable water, electricity and gas are available to the site.
- 45.** There is existing capacity at the Wastewater Treatment Works within proximity to or servicing the catchment, however this capacity will be taken by predicted growth already allowed for and therefore not included in the emerging Local Plan. As such an increase in wastewater treatment capacity would be required in order to accommodate the development. Discussions are taking place with the relevant utility providers with regard to expanding the established treatment works.

Ecology

- 46.** Much of the land at Marshmoor is currently either vacant, grazed, or used for storage. The Estate commissioned PJC Ecology to undertake ecological habitat surveys, which have established that the majority of the habitats found on the site are common and widespread throughout the UK and are considered to be of ecological value at a site level only. The primary habitats within the site, and so sources of ecological interest, are the mature trees and hedges, which are generally located around field boundaries and on the site's edges. These trees and hedges would be retained, protected and enhanced wherever possible, which would allow existing wildlife and habitats to remain largely undisturbed within the site.
- 47.** The proposals would also create new habitats and encourage the integration of wildlife within the site through new green corridors, tree and hedgerow

planting, sustainable drainage systems (SuDS) and other positive measures to encourage biodiversity, such as the use of bird and bat boxes. It is anticipated that these measures should lead to an increase in the site's biodiversity value.

Conclusions

- 48.** We believe that the land at Marshmoor, identified as sites WeG4a and WeG4b in the Council's emerging Local Plan, makes little contribution to the purposes of the Green Belt, and is suitable for release to meet housing and employment needs.
- 49.** The need for housing and the type of employment being proposed is substantial, as outlined in our separate representations concerning housing need, and the accompanying report by Peter Brett Associates concerning the need for R&D employment premises. The provision of development to meet this need would provide the necessary exceptional circumstances to justify an alteration to the Green Belt boundary.
- 50.** The landscape-led approach to development outlined in the Concept Masterplan would help to ensure that the proposals provided a suitable buffer and setting for Hatfield Park, a robust new Green Belt boundary, and a landscaped edge to Welham Green. This approach would also help to make the proposed business park a success, providing the high quality landscaped environment required to attract footloose businesses in the R&D and advanced engineering fields.
- 51.** Evidence by Gillespies demonstrates that the proposed development would be entirely acceptable, in the way that it would address the deficits in the current landscape and provide a suitable form of development to meet the objectives noted above.
- 52.** Technical work undertaken for the Estate, which accompanies these representations, clarifies that the proposed development is entirely deliverable, and that the site is suitable for development.
- 53.** Allocating this land would allow the Council to plan positively, taking the available opportunity to provide housing and employment to meet identified



needs. Failing to meet housing needs would have significant adverse social and economic consequences.

- 54. We trust the amendments and clarifications outlined above will be adopted in support of arriving at a sound and reasonable Local Plan.
- 55. We would of course be pleased to discuss any of the points raised in this letter with you in greater detail.

Proposed Amendments

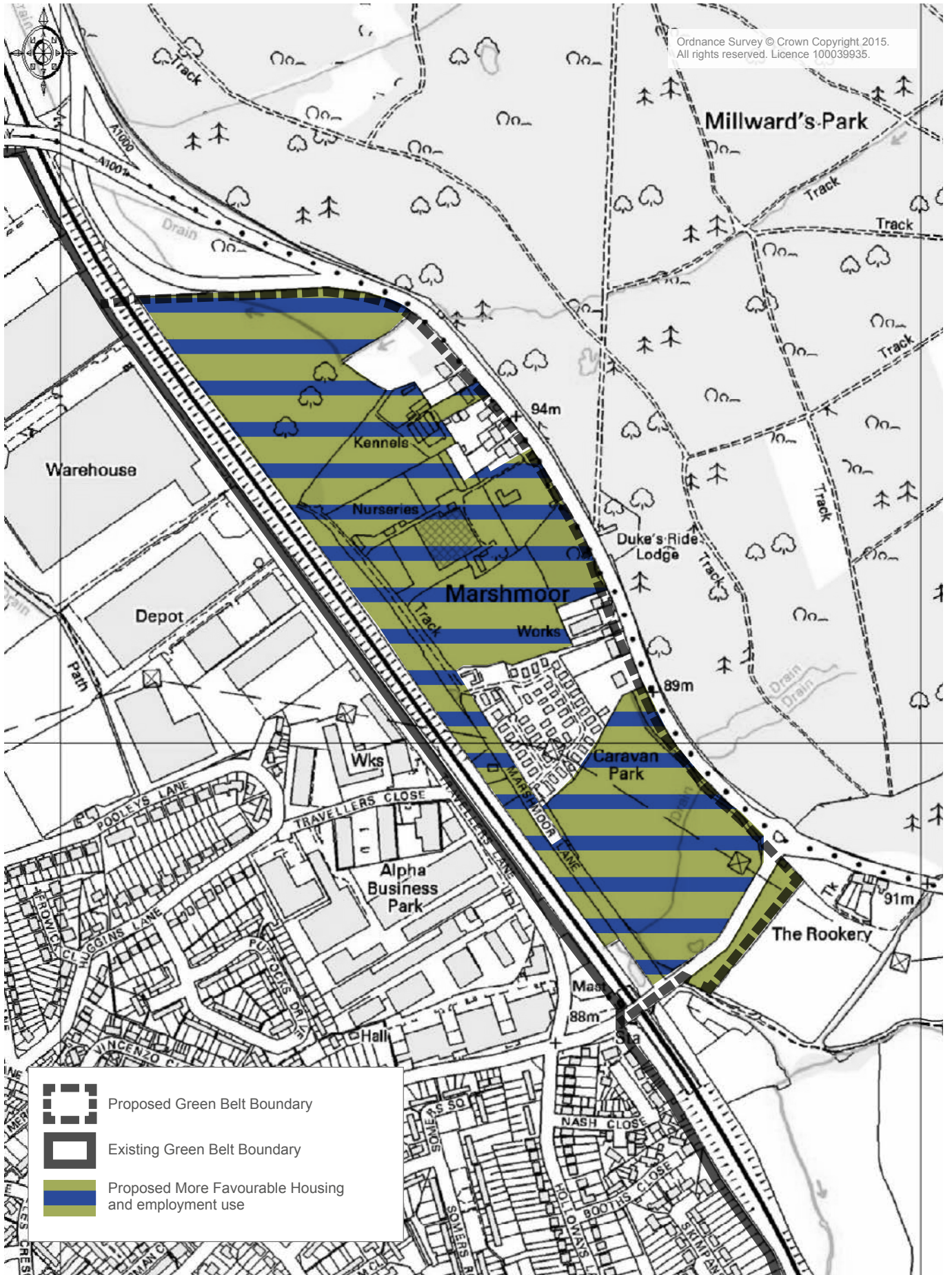
1. Allocation of Sites WeG4a and WeG4b

Sites WeG4a and WeG4b should be identified together as a single mixed-use allocation within the new Local Plan. The Green Belt boundary should be drawn back to allow this, in accordance with the proposed amendment shown on Drawing 1283/203.

2. Policy Intention CS2B

Long-term vacant employment land should be released for alternative uses, to stimulate change and an improvement in perceptions of the borough as a place to do business.

18 March 2015



Land at Marshmoor, Welham Green
(WeG4a and WeG4b)

AMENDMENTS TO PROPOSALS MAP

1/500, 1/2500
19/03/2015

NTS

Client: Gascoyne Cecil Estates



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