

**JOINT EXAMINATION OF THE WELWYN HATFIELD LOCAL PLAN (WHLP) AND
THE EAST HERTFORDSHIRE DISTRICT PLAN (EHDP)**

BIRCHALL GARDEN SUBURB/EAST OF WELWYN GARDEN CITY

Statement from CPRE Hertfordshire

1. I am Jacqueline Veater, BA, BTP MA, MRTPI, Planning Consultant for Campaign to Protect Rural England Hertfordshire (CPREH).
2. This statement complements our original representations on Chapter 13 East of Welwyn Garden City in the EHDP and Site SDS2 (WGC5)/Policy SP19, together referred to as Birchall Garden Suburb, which still apply, and seeks to address the Inspectors' questions as set out the Inspectors' Matters and Issues.
3. This statement addresses Matter 1 – Green Belt and touches on Matter 7 (in relation to Garden City principles) and Matter 11 - Implementation.
4. The Inspectors' specific questions about these proposed site allocations need to be considered in the context of national planning policy, and in this respect CPREH's continued objection to the overall level of development proposed by both Councils in their Submission Plans and in subsequent submissions to both the Examinations of the WHLP and EHDP is also relevant.
5. As made clear in our original representations and our Statement for Part 1 to the EHDP Examination and Part B to the WHLP Examination, the excessive housing targets proposed by the Council should be significantly reduced because of the great harm that would otherwise be caused to the Green Belt, and because the amount of land that the Council proposes to remove from the Green Belt is both unjustified and unnecessary.
6. CPREH considers that a reduction of several thousand dwellings from the proposed housing targets of both plans is justified and achievable in order to be consistent with national planning policy as set out in NPPF paragraph 14, and section 9 on Green Belt.

7. In particular, CPREH maintains that the Councils have failed to give proper weight to national policy in respect of Green Belt in identifying land for a garden suburb amounting to 2,550 new homes; 1,200 in the WHLP and 1,350 in EHDP.

Matter 1 – Green Belt

Introduction

8. CPREH considers that the Plans are not justified and are not consistent with national policy in respect of the Councils' overall proposed housing requirement / targets.
9. The number of homes proposed for the Birchall Garden Suburb/East of Welwyn Garden City is not specifically discussed in this statement. The statement concentrates instead on the allocation of the sites and the loss of Green Belt.

Question 1: is the extent of the allocation justified, effective and consistent with national planning policy and do exceptional circumstances exist to release every part of the allocation from the Green Belt?

10. The East Herts Green Belt Review (GBR/001) specifically identifies the site allocation EWEL1 as comprising two separate Green Belt Parcels 14 and 15. In the Welwyn Hatfield Green Belt Review Site Assessments 2014 the site SDS2 (WGC5) is identified as parcel GB46. The combined area of these three parcels of land form part of the Strategic Gap between the major towns of Welwyn Garden City and Hertford.

EWEL1

11. Of the two parcels of land assessed, Parcel 14, the larger part of the site north of the B195 and north west of the A414 was judged to be of very low suitability for development. In particular Parcel 14 is described in the review as of paramount importance to both checking the unrestricted sprawl of large built-up areas and assisting in safeguarding the countryside from encroachment.
12. Parcel 15 to the south of the B195 and west of the A414 was judged to be of low suitability as an area of search for development. It was described as playing a major

part in both checking the unrestricted sprawl of large built-up areas and assisting in safeguarding the countryside from encroachment.

13. If HERT3 south of the Welwyn Road and site EWEL1 East of Welwyn Garden City proceed, only one site, in single ownership, will remain between the towns of Welwyn Garden City and Hertford, increasing the vulnerability of the gap between the two towns.
14. The Green Belt Topic Paper (TPA/003) Paragraph 4.23 says that allocating Green Belt land for development adjoining existing urban areas is less harmful than allocating more isolated sites. Whether on the urban edge or on an isolated site, the stated exceptional circumstances, to satisfy short-term housing needs in the absence of reasonable alternatives, is not an adequate justification for loss of Green Belt.
15. The various Council documents do not provide a comparison between the damage to the countryside from developing in the Green Belt to the East of Welwyn Garden City compared with other site allocations or other options. CPREH does not consider that the Council has identified the likely adverse impacts, let alone justified them.
16. If exceptional circumstances exist to justify the release of site EWEL1 this has not been set out as required by national planning policy. There is no explanation for the removal of the site from the Green Belt. Paragraph 4.2.3 of EHDP only states a high level of housing need, a backlog of unmet need and the lack of suitable alternative locations to the north of the District to constitute the combination of factors which constitute exceptional circumstances. Paragraph 13.2.8 of EHDP considered only screening and the provision of a new Green Belt boundary for Welwyn Garden City in terms of the Green Belt aspects of the site allocation.

SDS2 (WGC5)

17. Despite Parcel 46 lying adjacent to Parcel 15 in the East Herts Green Belt Review, it is described in the Welwyn Hatfield Green Belt Review as having little or no part to play in checking urban sprawl because it only considers sprawl of the large built up areas of London, Luton and Dunstable and Stevenage. The purpose of this parcel is to check the unrestricted sprawl of Welwyn Garden City. It is however, described as playing an important role in safeguarding the countryside from encroachment.

18. The 'Justification' for Policy SP19 SDS2 (WGC5) Paragraphs 14.36 to 14.41 of WHLP describes the development but does not provide a justification for the release of Green Belt land.
19. The Welwyn Hatfield Site Selection Background Paper 2016 considered the merits of allocating the site as a whole including consideration of the Green Belt Study Review, Green Belt Boundary Appraisal and other relevant factors and concluded that the site's benefits outweigh the adverse impact upon the purposes of the Green Belt. However, it did not provide a convincing argument for the existence of exceptional circumstances to justify the loss of this large tract of Green Belt between Welwyn Garden City and Hertford.

EWEL1 and WGC5 (SDS2)

20. Because of the importance of these three sites to three of the four main Green Belt purposes, the justification for their release for development should be well argued. CPREH does not consider that the WHLP or the EHDP has identified the likely adverse impacts, let alone justified them.
21. The Planning Minister's letter to all Council's in 2016, indicated that where Green Belt constrains a council from meeting Objectively Assessed Need (OAN) the potential existence of exceptional circumstances could be considered. Paragraph 83 of the NPPF considers that Green Belt Boundaries should only be altered in exceptional circumstances. These exceptional circumstances have not been spelt out.
22. CPREH considers that both Welwyn Hatfield and East Herts Council's should do more to identify the potential contribution of brownfield and other previously developed land in their Districts, to meet the needs of the Housing Market Area (HMA).
23. CPREH considers that insufficient attention was given by the Council's to the option of concentrating a greater proportion of development within the district's principal towns and villages, to include regeneration and redevelopment of underused land, and encouragement for change of use of suitable land for residential purposes, as a way of reducing the amount of greenfield land needed for housing, and in particular

to minimise the amount of land that should be taken out of the Green Belt. A key Green Belt purpose is to '*assist in urban regeneration, by encouraging the recycling of derelict and other urban land*' (NPPF paragraph 80, CPREH emphasis). Failure to fully acknowledge the likely scale of windfall development, and capacity of existing previously developed land, risks the unnecessary loss of countryside in the gap between Hertford and Welwyn Garden City and the encroachment into the open countryside.

Question 3: Is the proposed new boundary to urban development as robust, in the context of visually preventing urban sprawl and maintaining openness, as the current one?

24. With regard to EWEL1 the northern parcel contains recreational land and woodland and creates a very well defined and clear edge to Welwyn Garden City. EHDP Paragraph 13.2.8 proposes that Panshanger Lane and the A414 would form the new Green Belt boundary. Although roads can act as a robust Green Belt boundary, in answer to the Inspectors' question about preventing sprawl and maintaining openness, the existing wide and deep buffer representing the boundary to Welwyn Garden City is much more robust; in fact, there is no comparison.

25. To the south, site SDS2 (WGC5) is mostly farmland. The site boundaries are a mixture of the existing building line (classified as strong in the Green Belt Boundary Appraisal) with mature hedges and established trees belts plus unclassified roads (classified as moderate in the Green Belt Boundary Appraisal). There are some prominent physical features (mentioned in the Green Belt Review) and the landscape has a highly open aspect, which is almost completely undeveloped. The Green Belt Boundary Appraisal in Appendix A of the ...proposes that 'The Commons' woodland and the A414 will create a stronger boundary overall. It also mentions that East Herts would establish the eastern Green Belt boundary to the Birchall Garden Suburb site. CPREH challenges the report which highlights in green that these two main conclusions "attribute significant weight in favour of the site" (Examination Document HOU/20a).

Question 4/5: The southern part of Welwyn Garden City is largely hidden from the view of travellers along the A414 by topography and woodland. The journey from Hertford to Hatfield is one through pleasant open countryside where the Green Belt aims of visually preventing urban sprawl by keeping some land permanently open is clearly demonstrated, despite the proximity of urban development. The proposal involves development adjacent to or in close proximity to the A414 for much of the distance to the west of the B195. How will this maintain the absence of a sense of visual urban sprawl outwards from Welwyn Garden City and impacting upon the experience of travellers along the A414?

26. The perceived sprawl of Welwyn Garden City that would result from the development of Birchall Garden Suburb will be very evident and cannot be mitigated against for travellers along the A 414. This will result in a substantial change to the landscape and openness of the Green Belt between Hertford and Welwyn Garden City.

Summary and Conclusions

27. East Herts Council's only explanation for ignoring Green Belt and countryside impact is the general assertion that the best locations to meet their full OAN are near to existing towns, in this case Welwyn Garden City. Welwyn Hatfield Borough Council argues that the provision of a primary school, the likelihood that the site will come forward in the next 15 years and a dubious conclusion that the new Green Belt boundary will be stronger than the existing lead them to the conclusion that the site's benefits outweigh the adverse impact upon the purposes of the Green Belt.

28. There is nothing in either the Council's evidence to demonstrate the existence of the exceptional circumstances necessary to adjust the Green Belt boundary to the east and south east of Welwyn Garden City. Instead, they should be prioritising brownfield sites in existing settlements to fortify the Green Belt.

29. CPREH does not consider that the Councils have justified, or even identified, all the likely adverse impacts on the countryside, or on the Green Belt in and around the proposed site in the strategic gap between Hertford and Welwyn Garden City.

30. CPREH accordingly asks the Inspectors to find both WHLP and EHDP proposals for the removal of land from the Green Belt to create Birchall Garden Suburb to the east

and south east of Welwyn Garden City unsound and remove the allocation and all related policies and text from both plans.

CPRE Hertfordshire January 2018