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Louise St John Howe
Programme Officer

By email.

17/09/2018

Dear Louise

[Green Belt Review Study Stage 3: Arlington Business Parks GP Limited](#)

Thank you for the opportunity to comment on the Welwyn Hatfield Green Belt Study Stage 3 ('GBR3') document, August 2018.

We welcome and concur with the Inspector's comment in October 2017 that he did not consider the development strategy put forward in the plan to be sound, in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt.

We also agree that was largely because the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas.

Given our longstanding representations on this matter, we are not surprised with the findings of the finer grained approach of GBR3 that it has indeed revealed opportunities as well as localised constraints that ultimately identify sufficient developable sites within the Green Belt for the Council to meet its objectively assessed housing need.

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Our analysis of the sites included on GBR3 Figure 7.1 (the lowest rating development scenario) is that only 12% of the land parcels are rated as 'low', moderate-low' or 'moderate' in terms of harm to the Green Belt resulting from release. Much of the land in these categories is either in uses that the Council would wish to retain or is already developed and as a consequence there is insufficient land in these categories to meet the housing shortfall. However, nearly 30% of the land parcels are rated 'moderate-high' and so whilst some of these sites have not been promoted for development they should clearly be given first consideration to parcels that are rated 'high' or 'very high' harm. The Inspector asked the Council to identify those areas which are essential to retain and GBR3 concludes that areas of 'very high' harm are most essential to retain. Alarming, parts of some existing allocations (for example, HAT1) include land that is considered to be most essential to the Green Belt and so sites with a lower harm rating, for example neighbouring HAT2, must be given first consideration over parts of HAT1, which have a higher harm rating.

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Reviewing Green Belt boundaries

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account (138, NPPF). Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport (138, NPPF). They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (138, NPPF).

Sustainable patterns of development

In considering releasing sites from the Green Belt within the low to moderate-high ratings, the Council must promote sustainable patterns of development, principally by maintaining the existing settlement pattern (Objective 1, 3.2, the draft Local Plan). Consequently, sites that maintain the existing settlement pattern (i.e. urban extensions to the main towns of Hatfield and Welwyn Garden) should be considered more favourably over other sites with an equal harm rating that do not maintain the existing settlement pattern. For example, whilst HAT2 and HAT15 have an equal harm rating, HAT2 maintains the existing settlement pattern and is consequently more likely to promote sustainable patterns of development than HAT15. This means that HAT2 should be considered more favourably than HAT15.

Promoting sustainable transport

Likewise, in considering releasing sites from the Green Belt within the low to moderate-high ratings, the Council must give first consideration to land which is well served by public transport. Consequently, sites that are/or could be well served by public transport must be given first consideration over other sites with equal harm rating that are not well served by public transport. For example, whilst HAT2 and HAT15 have an equal harm rating, HAT2 is better served and could be more easily served by public transport than HAT15. This means that HAT2 should be given first consideration over HAT15.

Compensatory improvements

Finally, in considering releasing sites from the Green Belt within the low to moderate-high ratings, the Council must set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. We have set out in previous representations how housing development on HAT2 can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land and this will be demonstrated in detail in a planning application for outline planning permission, which is due to be submitted in October 2018. However, in short, the application will include enhanced proposals for Ellenbrook Fields that will meet many of the essential and desired criteria for Country Parks, including a larger area of new woodland; ecological connectivity between woodland to the west and wetland habitats; more diverse range of recreational and sporting activities; creating valuable new stream habitat and providing real opportunities for open access and recreation including the provision of parking facilities.

Conclusions

Given our longstanding representations, we are not surprised that GBR3 has revealed opportunities and localised constraints but ultimately has identified sufficient developable sites within the Green Belt for the Council to meet its objectively assessed need. It is also clear that sites rated 'moderate-high' harm will be required to meet the housing shortfall. However, rather alarmingly, and a result of the flawed previous Green Belt work, some of the sites allocated for development in the draft Local Plan are now considered most essential to retain as part of the Green Belt. Consequently, we contend that there are sufficient sites in the low to moderate-high rating to meet housing needs and that in reviewing sites with an equal moderate-high rating first consideration should be given to those sites that maintain the existing

settlement pattern; are well served by public transport and can demonstrate compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. In all these considerations, HAT2 compares favourably over other sites being promoted around Hatfield and the details of this will be set out in an application for outline planning permission, which is due to be submitted in October 2018. Consequently, in considering any modifications to the Local Plan to identify additional land to be released from the Green Belt for housing first consideration should be given to HAT2.

Yours sincerely

David Maddox
Managing Director

cc: Robin Moxon – Arlington Business Parks Partnership
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