

LAND AT WELHAM GREEN

WELHAM GREEN PROMOTERS

GREEN BELT REPRESENTATION ON THE WELWYN HATFIELD GREEN BELT
STUDY, STAGE 3

ON BEHALF OF HILL RESIDENTIAL, ID: 891490

SEPTEMBER 2018



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1.0 Introduction

- 1.1 This representation has been prepared on behalf of Hill Residential and reviews the assessment of Parcel P64 in the Welwyn Hatfield Green Belt Study Stage 3, August 2018 prepared by LUC.
- 1.2 Welwyn Hatfield Borough Council submitted its draft Local Plan to the Secretary of State in May 2017 and its Examination is currently underway. At the end of the Stage 2 hearing session in October 2017, the Inspector identified a need for further work in order to expand the findings of the council's Green Belt review evidence.
- 1.3 The Stage 3 Green Belt Study was prepared to address the Inspector's comments. The Inspector's comments that have a direct bearing on Potterells Farm are:
 - The Stage 1 Green Belt Review was too strategic and therefore its assessment on the extent of potential harm on the purposes of the Green Belt, caused by development within the large parcels was at too large a scale and dismissed smaller individual potential development sites adjacent to the urban areas. In other words, it was not at a finer scale required to effectively assess the Green Belt
 - The Stage 2 Green Belt Review was at a finer grain but did not examine all the potential development sites adjacent to the urban areas
 - The Stage 2 Green Belt Review also assessed openness but considered landscape character when assessing openness when it should only have been concerned about the absence of built development and other dominant urban influences
 - It did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels in order to assess essential areas of Green Belt to be retained.

2.0 General comments on methodology

- 2.1 Given the fact that the Inspector specifically requested that the Stage 3 report needed to assess the Green Belt at a finer grain, it is confusing as to why LUC have decided to create new parcels that are far larger than those used in the Stage 2 report. Furthermore, the Inspector asked that those areas adjacent to urban areas that had been omitted from the Stage 2 should be assessed.
- 2.2 However, rather than assessing only the areas that were omitted in Stage 2, LUC have instead included previously assessed parcels within their new larger parcels. Therefore, WeG3 is now within Parcel P64 which includes former WeG1, WeG2, WeG15 and the Station Road allotments as well an area south of WeG15 that was formerly omitted from the Stage 2 report.
- 2.3 This means that parcels that had already been assessed against the purposes of the Green Belt within Stage 2 are now reassessed in Stage 3. To make matters more confusing, the methodology for the Stage 3 assessment of the Green Belt purposes differs from that used in the Stage 2 report. Therefore, the assessed contributions to the Green Belt for some purposes now have differing results.

Stages 1 and 2 follow a similar methodology whereas Stage 3 does not, meaning there are inconsistencies across the Green Belt assessment as a whole.

2.4 Following the Inspector’s comments LUC have provided an assessment of harm. Their definition of harm is set out at paragraphs 3.80-3.90 of the LUC Final Report.

2.5 Three factors are stated as informing the assessment of Green Belt harm:

- The contribution to Green Belt purposes
- The loss of openness and the implications on the integrity of the wider Green Belt
- The consistency and strength of the Green Belt boundary

3.0 Review of the Stage 3 assessment of Parcel 64

3.1 Given the suitability of the site as evidenced by the assessment comments on page 291 of the LUC report there appears to be an obvious disconnect between the assessment of the Green Belt purposes and the assessment of harm which is scored as Moderate-High. We can only assume this is due to the subjective definition of harm as set out on page 32 of the LUC report.

3.2 In the assessment of harm from Parcel P64 being released from Green Belt as a whole (P291 LUC) states:

“The parcel is largely open and rural in character and its release would lead to encroachment on the countryside and impact on the integrity of the wider Green Belt to the west and south. However, the parcel is contained on two sides by the existing urban edge and woodland to the south would create a clear southern boundary.”

3.3 It is necessary to understand why this parcel has been assessed as having a potential Moderate–High harmful effect, despite the supportive comments regarding its contribution to the purposes of Green Belt in relation to its suitability to be released. In order to achieve this, we need to look at the three factors that LUC used to define harm and review each in turn. For ease we have reproduced the assessment information by LUC for Parcel P64 which is indicated on figure 1.

Contribution to Green Belt Purposes

3.4 Firstly, we need to understand if there are any differences in the assessment of the Green Belt purposes between the Stage 2 assessment of WeG3 and Stage 3 Parcel P64. The table below provides the assessment of the Green Belt purposes for the Stage 2 and Stage 3 Green Belt assessments.

Table 1.1

Contribution to Green Belt Purposes		
Purpose	Stage 2	Stage 3
Purpose 1: Sprawl	Limited or no contribution	Limited or no contribution
Purpose 2: Merging of Settlements	Partial contribution	Partial contribution

Purpose 3: Safeguarding the Countryside	Significant contribution	Significant contribution
Purpose 4: Historic Towns	Limited or no contribution	Limited or no contribution
Purpose 5: Urban regeneration	Not assessed	Significant contribution
Local Purpose: Settlement Pattern	Partial contribution	Partial contribution

- 3.5 As per our previous representation on the Stage 2 Green Belt assessment for WeG3, dated July 2017, we considered the assessment of purpose 3 – encroachment was too high. We considered it should have been assessed as partial rather than significant.
- 3.6 To be graded as significant it needed to exhibit strong countryside characteristics with high levels of visual openness and free from encroachment/development.
- 3.7 WeG3 has residential housing along Welham Manor forming part of its northern boundary, a car repair yard and scrub forming the remainder of the northern boundary and allotments visible along part of its eastern boundary. It cannot be assessed as exhibiting strong countryside characteristics with high levels of visual openness and being free from encroachment/development. Far from having high levels of visual openness, it is completely enclosed with housing to its northern boundary and tall hedgerows and woodland scrub along its eastern, western and southern boundaries.
- 3.8 We therefore concluded that its performance against purpose 3 should be assessed as to partial.
- 3.9 Our comments on the Stage 3 assessment are provided in table 1.2 below:

Table 1.2

Contribution to Green Belt Purposes	
Purpose	Comments
Purpose 1: Sprawl	We agree the parcel is sufficiently separated or distant from a large built-up area for there to be a limited or no contribution to the purpose of sprawl.
Purpose 2: Merging of Settlements	The parcel sits within a 4.5km gap between Hatfield in the north west and Potters Bar to the south east. As with the Stage 2 Green Belt review the parcel is assessed as having a partial contribution to this purpose. However, there are areas of ancient woodland to the north west and woodland blocks to the south east that mean this parcel shares elements of the criteria that would see it having a limited contribution. We therefore suggest that Parcel P64 fall within the very lower end of having a partial contribution .
Purpose 3: Safeguarding the Countryside	We do not agree with the assessment of Parcel P64 as contributing to this purpose significantly. The criterion for significant contribution states the parcel must contain the characteristics of open countryside relating strongly to the wider countryside, have a sense of separation from the settlement and lack urbanising development. To state in the assessment that this parcel lacks urbanising development is untrue. It is enclosed on two boundaries by settlement, which are visible to the north and east of the parcel. We consider that Parcel P64 more closely

	<p>relates to the criterion for partial contribution which states: “<i>Land that contains the characteristics of open countryside and has limited urbanising development...</i>” We therefore consider the grading should be reduced to partial contribution.</p> <p>With regards to parcel WeG3, this assessment is completely incorrect. As stated above in paragraph 3.7 this parcel abuts residential settlement and a car repair yard and has allotments to its eastern boundary as well as being completely enclosed from the wider countryside. The land does not contain the characteristics of open countryside and relates more strongly to the urban edge. As such we consider it should be assessed as having limited or no contribution to this purpose.</p>
Purpose 4: Historic Towns	It is agreed that this should be limited or no contribution
Purpose 5: Urban regeneration	The significant contribution is common to all parcels and we have no issue with this grading, but there is no reason why this should be significant. Instead it should be graded as not applicable .
Local Purpose: Settlement Pattern	We have no comment in regards the grading of this purpose as partial contribution .

The loss of openness and the implications on the integrity of the wider Green Belt

- 3.10 All undeveloped Green Belt land, if developed, will result in the loss of openness to some extent. The issue will be whether the land removed will impact on the integrity of the wider Green Belt.
- 3.11 As described in the LUC Final Report on page 18-19, openness can be defined as having both a spatial aspect and a visual aspect.
- 3.12 In the assessment of harm for Parcel P64, in which WeG3 is located: “*woodland to the south would create a clear southern boundary.*” It should be noted that the land south of WeG15 is also in the ownership control of the Potterells Farm Partnership and as such is proposed as providing strategic green infrastructure. The existing riparian woodland running along Mimmshall Brook that forms this southern boundary will be enhanced and new structural woodland belts are proposed to supplement the existing western hedge and fill any gaps as well as mark the line of development in line with the existing development along Station Road.
- 3.13 With regards to the spatial aspect of Parcel P64, the existing residential development and the car repair workshop affect, to a limited degree, the extent to which this parcel is considered open, creating a shared relationship to both the settlement of Welham Green and the wider countryside.
- 3.14 We therefore conclude that through these strategic green infrastructure proposals, development of Parcel P64 and its loss of openness would not impact on the integrity of the wider Green Belt.

- 3.15 This is supported by LUC's findings on page 62 of their final report. Here they state that none of the parcels around Welham Green form essential Green Belt.

The consistency and strength of the Green Belt boundary

- 3.16 As set out in paragraph 3.12 above, using the woodland belt along the southern boundary of Parcel P64 along with strategic green infrastructure enhancement proposals to this existing woodland belt and the western hedgerow boundary, the boundaries would provide recognisable and defensible boundaries in line with the National Planning Policy Framework (NPPF) that would be robust to any future challenge.
- 3.17 Taking all these above factors into account and considering them with the other parcels around Welham Green we consider that the assessment of harm for Parcel P64 should be lowered from Moderate – High to **Low – Moderate, and certainty no higher than Moderate.**

LUC harm scenario assessments

- 3.18 The LUC Final Report on pages 292 and 293 provides a series of scenarios looking at the harm of removing Parcel P64 as a whole from the Green Belt and then a variety of scenarios looking at the impact when using varying combinations of the Stage 2 land parcels. We have reproduced some of these scenarios on figure 2.
- 3.19 As can be seen, scenario P64c assesses the harm using WeG1, WeG2, WeG3 and the allotments. The comments provided for scenario P64c on page 292 state:
- “it is assumed that WeG3 would be released in association with WeG1 and WeG2. Their release would weaken the Green Belt land within the allotment area to the north so it is assumed this area also would also be released at the same time to make a more well defined Green Belt boundary. Development within WeG3 would lead to encroachment on the countryside but it makes little contribution to Purpose 2 and the local purpose and no contribution to Purpose 1 and 4. The area is relatively well contained by existing tree belts on the southern edge, by the urban area to the north, and by Station Road to the east.”*
- 3.20 The above provides another example whereby the subjective nature of the assessment of harm appears to have created a disconnect with the assessment and the subsequent grading of harm.
- 3.21 With regards to the visual aspect of WeG3, it is visually enclosed around all four boundaries.
- 3.22 With regards to the spatial aspect of WeG3 the existing residential development, the car repair workshop, allotments and scrubland landscape affect, to a limited degree, the extent to which this parcel is considered open and creates a shared relationship to both the settlement of Welham Green and the wider countryside.
- 3.23 Given the assessment of P64c above, we do not understand how LUC can make such an assessment and yet grade the harm as Moderate. Furthermore, given our comments regarding Purpose 3: Encroachment provided in table 1.2 above we consider the harm should be assessed as **Moderate -Low.**

4.0 Conclusion

4.1 We have concerns over the robustness of the LUC report.

- Most confusingly they have not followed the Inspector's comments to make their Green Belt assessment at a finer grain, and have in fact created parcels larger than those used in Stage 2
- They have not simply assessed the areas of Green Belt adjacent to the urban areas that were omitted from Stage 2, as per the Inspector's comments, but included parcels previously assessed within Stage 2
- They have used different assessment criteria to assess the purposes of Green Belt, which makes sensible comparison very difficult
- The subjective nature of the review of harm makes a transparent assessment impossible, leaving the reader with no ability to cross check the findings
- There is a disconnect between the assessment and grading of harm provided in the various harm assessment scenarios
- The Green Belt assessment of purposes and harm are often inconsistent with each other.

4.2 All the above leads to confusion in terms of the assessment. We consider that the Green Belt assessment of purpose 3; Safeguarding the countryside from encroachment should be assessed as **partial** rather than significant in relation to Parcel P64 as a whole and for WeG3 individually, assessed as having **limited or no contribution** to this purpose.

4.3 The assessment of harm as Moderate – High we consider should be assessed as **no more than Moderate** in relation to Parcel P64 as a whole and for WeG3 individually, assessed as **Moderate -Low**.