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WELHAM GREEN

GREEN BELT REVIEW

1.0 INTRODUCTION AND EXECUTIVE SUMMARY

1.1 This review relates to Parcel 59 and its sub parcel P59a, the relationship between Skimpans Farm and other Welham Green sites, and the robustness of the methodology used by LUC for their Stage 3 assessment of the Green Belt.

1.2 The findings of this assessment are that:

- **the Green Belt assessments of purposes and harm are inconsistent with each other;**
- **LUC use different assessment Parcels to that of SKM, which makes sensible comparison almost impossible;**
- **the LUC graphics do not provide the wider settlement view, so that the reader cannot easily understand how the sites are scored, and the logic behind the scores of the gradings of Green Belt purposes and harm are inconsistent; and**
- **the subjective nature of the review of harm makes a transparent assessment impossible, leaving the reader with no ability to cross check the findings.**

1.3 All the above leads to confusion and lack of clarity in terms of the assessment, and a misreading in terms of assessed harm for site P59. This confusion is more relevant when it is clear from site observation, and from LUC's own description of the site, that it is suitable for development. Such development cannot by LUC's own admission cause the Moderate-High harm stated. Instead, the stated harm to Parcel 59 must be downgraded to no more than moderate.

2.0 PARCELS P59 AND P59A

2.1 Comments on the suitability of Parcel 59 are provided on page 267 of the LUC report. Parcel P59a lies within Parcel P59 and performs even better in Green Belt terms.

2.2 The LUC description of P59 is set out in glowing terms, yet inexplicably this parcel has been assessed as creating Moderate-High harm. That there is an obvious disconnect between the two, and to other Welham Green sites, which `may be due to the subjective definition of harm (as set on page 32 of the LUC report).

2.3 Parcel P59, Release of the Parcel as a Whole, (P32 LUC) states, with our emphasis:

‘The parcel is largely open and rural in character and its release would lead to encroachment of the countryside. The parcel is however contained by existing residential development to the west, the railway line to the east and woodland to the south. Due to this containment, the impact on the integrity of the wider Green Belt resulting from release of the parcel would be limited. Release of the parcel would only extend the urban area of Welham Green further south by c.70m and would not have a significant impact on narrowing the gap between Welham Green and Brookmans Park. A new Green Belt boundary could be formed along the field boundary to the south.’

2.4 Site inspection supports these conclusions:

- parcel 59 is strongly contained by development, the railway line and woodland, therefore development would cause limited effects on the integrity of the greenbelt;
- it is agreed that here would be no significant impact on the Green Belt between Welham Green and Brookmans Park;
- a new Green Belt boundary can be formed; and
- The description of harm for the smaller Stage 2 WeG6 parcel states ‘release of the site would be similar to the release of the site as a whole.’

2.5 To try to understand why parcel P59 has been described as having a potential Moderate – High harmful effect, despite these supportive comments, it is necessary to consider both the definition of harm and the Green Belt purposes.

2.6 Overall, in our view, Parcel 59 meets the Green Belt purposes. This is because the parcel is:

- Enclosed by strong and robust boundaries;
- Enclosed by developments on three sides;
- Visually Separate from major settlements; and
- On the edge of and part of an existing village, not in visually open countryside.

2.7 The definition of harm is set out at paragraphs 3.80-3.90 of the LUC Report. It is notable that harm is said to be provided by professional judgement, not by rigorous analysis.

2.8 LUC state that three factors inform their assessment of subjective judgement harm, namely:

- contribution to Green Belt purposes;
- loss of openness and whether this matters; and
- consistency and strength of the Green Belt LUC.

2.9 Our assessment of each of these factors follows below, from which it will be seen that Parcel 59 and P59a has been wrongly graded, instead it should be scored as no higher than low-moderate harm. Thus, release of this site would not have a fundamental impact on the integrity of the remaining Green Belt.

2.10 The parcel’s contribution to Green Belt purposes are set out in the table below:

Contribution to Green Belt Purposes

Contributions of P59 and P69a to Green Belt Purposes	
Purpose	Comment
Purpose 1: Sprawl	It is agreed that there is no sprawl from the built-up area, therefore a <u>limited or no contribution</u> .
Purpose 2: Merging of Settlements	It is not agreed that the Parcel provides a partial contribution, instead this is a limited contribution. The reason for this is that, when seen from the site, there is no effective perception of either of the larger settlements. Views out are enclosed by either the settlement of Welham Green, or by the vegetated and embanked railway line, or by woodland. <u>Suggested change; limited or no contribution</u> .
Purpose 3: Safeguarding the Countryside	The LUC assessment is factually incorrect when it states that the Parcel lacks any urbanising development. This may most easily be demonstrated by the map and aerial photograph on page 265 of the LUC Study. In fact, the potential P59a site is enclosed on three sides by development – housing, community centre and railway line. In our view, the grading should be reduced to a <u>partial contribution</u> . It is not open countryside in any sensible or practical sense.
Purpose 4: Historic Towns	It is agreed that this should be <u>limited or no contribution</u> .
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 <u>not applicable</u>
Local Purpose: Settlement Pattern	In our view the parcel fits in well to the established settlement pattern, namely a modest and sensitive extension to an existing village. This must be contrasted with other sites where no such relationships exist, for example within open countryside away from any settlement or beyond natural boundaries or extending as a finger into open countryside. An example of these more open and visible site is those adjacent to the A1 (M), beyond Welham Green, to the west. We accept a <u>partial contribution</u> to the settlement pattern but see the site as having a potentially greater benefit than given in the report.

Loss of Openness and Whether it Matters

- 2.11 Any Green Belt site will, if developed, be affected by a loss of openness. This is inevitable. The real question is whether it matters in terms of the Green Belt purposes.
- 2.12 Parcel P59a is enclosed by woodland, existing houses, a community centre and an embanked and vegetated railway line. It will not be surprising to anyone to find it suitable for development and it must be preferable that an enclosed site such as this should be developed in preference to a more open and visible site away from the settlement or beyond natural boundaries, where the same quantum of development could have a much larger visual and character impact. Therefore, here it does matter.
- 2.13 This is supported by LUC's findings that this site is not essential to keep open (page 62 of the final report). Parcel P59 is not defined as being essential to the gap between Welham Green, Brookmans Park and Potters Barsend

Consistency and the Strength of the Green Belt Boundary

- 2.14 As set out in the paragraph 1.3 above, a new Green Belt boundary could be formed by the field boundary to the south. We agree this is not only sensible, but achievable, and such a boundary would be robust to future challenge.
- 2.15 Taking all these above factors into account and considering other Parcels in the area, the assessment of harm for Parcel 59a should be **Moderate-Low**, certainly no higher than **Moderate**.

3.0 OTHER SITES AT WELHAM GREEN

- 3.1 It is not easy to understand the wider picture at Welham Green from the plans in the LUC report. To help this understanding as it effects Parcels 59 and P59a four new plans are now attached. The first, L1, shows the number of significant contributions of each site to the Green Belt purposes. The second, L2, shows the ranking of harm of each site. The third, L3, shows the ranking of harm for each of the smaller sites. All Stage 2 Parcels are taken from the LUC report, appendix 6.1. Plan L4 provides our recommendations on the most appropriate sites for development at Welham Green.
- 3.2 These new plans make clear that:
- the key gaps must surely be to the north adjacent to Hatfield, and the east, outside the railway line;
 - there are opportunities for sensible development around Welham Green which will not impact upon these crucially sensitive areas.
- 3.3 Plan L1: LUC, Assessed Contributions to Green Belt purposes:

Sites P55-64 are all located in Welham Green. The Green Belt purposes score from page 49-51 of the stage 3 report is reproduced on Plan L1. Actually, together these show a remarkably similar score for all the Welham Green sites, with only two (P57 and P64) showing anything different. Accordingly, it might be expected that the assessment of harm might also be of a similar degree, however, perhaps because of its subjective nature, this proves not to be the case. Site P59, Skimpans Farm, is shown to be similar in score to the other sites, yet inexplicably despite being more enclosed by strong boundaries, and tucked into the village fabric. It receives a higher score in terms of harm, a finding that is illogical.

3.4 Plan L2: LUC, Assessed Harm to the Green Belt created by Parcels:

Plan L2 shows the Council's assessment of harm relating to development of sites P55-P64. It might be expected that the relationship between conformity with the Green Belt Purposes would be at least reflected in the result of harm from developing these Parcels. However, the resistant pattern of Plan L2 bears little resemblance to that of Plan L1. Once again Site P59, Skimpans Farm, is illogical in its scoring, being higher than other parcels, despite its enclosure and suitability. It may be that this is due to desk study work, not gained from the site inspection.

3.5 Plan L3: LUC, Assessed Harm to the Green Belt created by Stage 2 Parcels:

Plan L3 considers the harm attributed to Welham Green in terms of the smaller Stage 2 Parcels. As site factors provide an increasingly important factor at this smaller scale, it is perhaps not surprising that the degree of assessed harm is more disparate than that shown on Plan L2. However, the plan shows that similar parcels elsewhere and close to the village fabric are seen to be less harmful than sites in the open countryside, or beyond natural boundaries. In these circumstances it is again surprising that Skimpans Farm has been scored more highly than other Welham Green sites, an error that must surely be recognised.

3.6 Plan L4: SLR Recommendations for Dsdevelopment at Welham Green

Plan L4 provides a more objective assessment of the parcels and sub parcels at Welham Green and provides a sensible and practical way forward for development at the settlement.

4.0 RECOMENDATIONS AND REVIEW OF LUC METHODOLOGY

4.1 Real concerns must be expressed at the robustness of the subjective assessment used by LUC:

- the Green Belt assessments of purposes and harm are often inconsistent with each other;
- LUC use different assessment Parcels to that of SKM, which makes sensible comparison almost impossible;
- the LUC graphics do not provide the wider settlement view, so that the reader cannot

easily understand how the sites are scored, and the logic behind the scores of the gradings of Green Belt purposes and harm are inconsistent; and

- the subjective nature of the review of harm makes a comparative assessment impossible, leaving the reader with no ability to cross check.

- 4.2 All the above leads to confusion in terms of the assessment, and a misreading in terms of harm for Parcels P59 and 59a. This confusion is more relevant when it is clear from site observation and from LUC's own description of the site is suitable for development and that that development cannot by LUC's own admission cause the Moderate-High harm stated.
- 4.3 Recommendations on the potential development of Welham Green are set out on Plan L4. This provides a sustainable solution to development within well-considered short- and longer-term Green Belt boundaries.
- 4.4 The stated harm to Parcel 59, and P59a Skimpans Farm, should be downgraded to no more than moderate.