

Little Heath Action Group (LHAG) Comments - Welwyn Hatfield Local Plan - Green Belt Study

Simon Polledri - 18th September 2018

To date comment on specific sites has not been permitted. We will endeavour to make our general comments to the Green Belt Study in this submission. We do not wish to participate in this round of hearing sessions.

We intend to make our site specific representations, including those regarding this Green Belt Study, in Stage 6 scheduled provisionally for 10 December 2018. We do wish to participate in these hearing sessions.

Cross Boundary Green Belt Assessment

As you may be aware, Hertsmere are in stage 1 of their plan and they also have initial plans to build up to the WHBC border. I include an aerial photo depicting Little Heath and some of the earmarked sites for development. (Including Potters Bar Golf Course) It is clear there has been no joint Green Belt assessment around the WHBC/Hertsmere borders or proper Duty to Cooperate discussion on this issue. A proper review would assess all of the immediately joining Green Belt spaces to the parcels and not stop at the Borough border.

(Enc. LH Green Belt overhead photo)

Parcels along WHBC/Hertsmere Borders

In addition to the above, there seems to be an inordinately large number of suggested parcels around the WHBC and Hertsmere borders. These include Parcels P78, P79, P80, P81, P82, P83, P84 and P85. We acknowledge this does not mean everyone will be developed but it surely indicates the absolute intent to develop this area?

This concentration of Parcels does not exist anywhere else within WHBC. If this level of detailed scrutiny is to be applied, why is it not applied evenly across the Borough?

If any of the additional parcels should go ahead, it would have an unreasonable cumulative effect on this area of the Borough.

Report Aims

EX88B 1.2 States the three key aims of the study. Aim1: "To undertake a **comprehensive** and rigorous assessment of the Green Belt" Aim 3: "To assess the contribution to the Green Belt purposes of **all land** within the Borough"

However it seems this has not been carried out. There are vast omissions of land to the south of Welwyn Garden City and to the east Hatfield. The report seems to have ignored these areas of land completely. We do not feel the 79% of Welwyn & Hatfield that is Green Belt has been properly assessed rendering the report of limited value for its stated three key aims?

This is significant as it clearly displays that the report and therefore the council has not fully explored all reasonable Green Belt Options.

Definitions

Large Built Up Areas

As the report rightly identifies there is no standard definition to a “large build up area.” But suggests these are towns such as Stevenage, Dunstable and Cheshunt are examples of this. Whilst population size is not directly representative of area it is interesting to note that in the 2011 Census; Welwyn Garden City had a population of 48,380 whereas Cheshunt had 45,800. Dunstable had just 33,805 (2011 census) Further, it is arguable that the extremely narrow gap between WGC and Hatfield (population 37,577) prevents WGC & Hatfield (combined population 85,957) being classified as a Large Built Up Area.

Sprawl

The EX88B report asserts there is no clear definition of sprawl, citing the PAS guidance question “For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?”

Terms such as “well designed” “good masterplanning” and even “positively” are entirely open to interpretation. It seems planners are trying to introduce new interpretations and proviso’s to massage the true meaning to suit their own ends?

The report seems to be comfortable using the Oxford English Dictionary definitions so for ease of reference we include their definition of Sprawl - “The disorganized and unattractive expansion of an urban or industrial area into the adjoining countryside”

But more importantly the NPPF states that Green Belt Boundaries should last “beyond the plan period.” if this is not adhered to (as is currently the plan) then surely development into the countryside cannot be deemed to be “organised” or “good master planning.”

Constant review of Green Belt Boundary’s = SPRAWL

First Purpose of the Green Belt - To check the unrestricted sprawl of large built-up areas.

If there is no agreed definition of sprawl how is it possible it can only apply to a Large Built up Area as the report seems to suggest? The Oxford English Dictionary only specifies urban or industrial. Therefore, it is entirely reasonable to assume sprawl could apply to other sized built up areas. This has significant implications for how the council has interpreted this and must surly indicate this is open to further interpretation.

Towns

Whilst there is no definition we agree with the WHBC Local Plan which has recognised Potters Bar as a Town.

Merging

We agree with the reports definition of merging

Village

We would like to recognise there does not seem to be a transparent definition of Village. It is not mentioned in the NPPF and therefore it seems at the sole discretion of the council?

Impartial Report

We are aware WHBC Officers were, for some time, working with the creators of the report to “finalise it” This seems to throw into question the intended impartial nature of the report?