

**LAND AT WELHAM GREEN**

WELHAM GREEN PROMOTERS

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

ON BEHALF OF THE PROMOTERS AT WELHAM GREEN,

ID's: 1047643,891490 and 537908

SEPTEMBER 2018



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	Signature		
	Date		
	Please return by		

**LONDON**  
7 Heddon Street  
London  
W1B 4BD

**BOURNEMOUTH**  
Everdene House  
Deansleigh Road  
Bournemouth  
BH7 7DU

**TELEPHONE**  
020 3664 6755

[www.tortld.co.uk](http://www.tortld.co.uk)

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No.1935454 Registered office  
Everdene House Deansleigh  
Road Bournemouth Dorset  
BH7 7DU Registered in England  
and Wales VAT No.905095727

## 1.0 Introduction

- 1.1 This representation has been prepared on behalf of the Welham Green Promoters and reviews the Welwyn Hatfield Green Belt Study Stage 3 prepared by LUC, August 2018, in relation to the Welham Green Promoter land parcels, as assessed in the Stage 2 Green Belt Review. Figure 1 indicates the Welham Green Promoter's land parcels.
- 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 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, Potterells Farm, for example, formerly located within WeG15 of the Stage 2 report is now within Parcel P64 which includes former WeG1, WeG2, WeG3, WeG15, the Station Road allotments as well an area south of WeG15 that was formerly omitted from the Stage 2 report. The relationship between the finer grain Stage 2 parcels and the new larger LUC parcels is provided in figure 2.

- 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 Cumulative assessment of the Welham Green Promoters' land parcel and their potential impact on harm to the Green Belt**

- 3.1 Figure 1 indicates the location of the Welham Green Promoters' land parcels as assessed in the Stage 2 report. Figure 2 indicates their relationship between these Stage 2 parcels and the larger Stage 3 parcels. Figure 3 indicates the Stage 3 parcels around Welham Green and includes the LUC's assessment of harm for each overall parcel. As can be seen, with the exception of Parcel P57, the areas that are graded as having the highest impact on Green Belt harm are those parcels furthest away from the edge of Welham Green.
- 3.2 Based on our own appraisal, the following section considers each of the parcels that contain one of the Welham Green promoter's sites and review the assessment on harm.

#### **Parcel P59 containing WeG6**

- 3.3 We agree with LUC and the statement that:

*"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"*

- 3.4 A new enhanced boundary along the south is achievable and given the comments above it is difficult to understand why it was graded as causing Moderate-High harm. Considering the enclosed nature of the site we consider it should be assessed as Moderate-Low and certainly no higher than Moderate.

### **Parcel P60 containing WeG12**

- 3.5 In the LUC assessment of harm for this parcel they state:

*“The parcel is largely open and rural, therefore its release would lead to encroachment on the countryside. However, as the parcel is contained to the south and east by the urban area of Welham Green and to the north and west by a Local Wildlife Site the harm to the wider Green Belt that could result from release of the parcel is limited. A new Green Belt boundary could be defined using the field boundaries which is no less or more clearly defined than the existing Green Belt edge.”*

- 3.6 Considering the visual containment of this parcel and the fact that its spatial aspect is very much dominated by the urbanising elements such as the residential properties along its southern edge, the industrial park to the west and electricity pylons traversing the site itself, we consider the parcel should be assessed as Moderate-Low rather than from Moderate.

### **Parcel P61 containing WeG10**

- 3.7 In the LUC assessment of harm for this parcel they state:

*“The parcel is largely open and rural in character and its release would lead to encroachment of the countryside. The parcel is contained to the northwest by protected woodland and to the northeast by the settlement edge of Welham Green, and to the southwest by a farm building. As such the parcel is relatively well contained and the impact upon the integrity of the wider Green Belt if released would be limited.”*

- 3.8 Given the above assessment how can LUC have graded this parcel's harm if released from Green Belt as Moderate-High? There is no connection between the comments and the grading. We consider this should be assessed as Moderate.

### **Parcel P63 containing the proposed school site**

- 3.9 The proposed school site occupies a narrow parcel of land to the south of Dixons Hill Road and adjacent to residential properties along Welham Manor along part of its eastern boundary and the woodland belt of Parcel WeG3 as its remaining eastern boundary. Its western and southern boundary is presently unbounded.

- 3.10 In the LUC assessment of harm for Parcel P64 they state:

*“The release of the parcel would result in significant encroachment on the countryside and an extensive extension of the urban edge of Welham Green to the west. Release of Parcel P63 would adversely affect the contribution land within Parcel P64 makes to the Belt, affecting the integrity of the wider Green Belt.”*

- 3.11 What is not mentioned in the assessment is the fact that a ridge exists roughly in line with the south western corner of WeG3. Land falls away from this ridge towards Dixons Hill Road.

- 3.12 In our Stage 2 reps, dated July 2017, we assessed this parcel against the purposes of Green Belt using the Stage 2 methodology and concluded this parcel

performed only partially for Purposes 2 and 3 and limited for Purpose 1 and 4 with the local settlement pattern purpose performing only partially.

- 3.13 The site is not isolated, but contiguous with Welham Green and through development proposals has the opportunity to deliver strategic structural planting along the western and southern boundary that would secure a defensible and long-term boundary in line with the National Planning Policy Framework (NPPF), July 2018, whilst ensuring a positive relationship to the countryside setting.
- 3.14 We therefore consider that as a sub area of P63 and with strong strategic structural planting to its western and southern boundaries, the proposed school site would create less than moderate harm on the wider Green Belt.

#### **Parcel P64 containing WeG1, WeG3 and WeG15**

- 3.15 In the LUC assessment of harm for this parcel they state:

*“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.”*

- 3.16 Our assessment has concluded that P64 is visually enclosed to the north and east by the existing urban edge of Welham Green and a woodland belt along Station Road, by a hedgerow to the west and by riparian woodland running along Mimmshall Brook forming the southern boundary. Furthermore, 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. This infrastructure planting will see enhancements to the existing woodland belt along the south boundary and new structural woodland belts to supplement the existing western hedge, filling in any gaps as well as marking the line of development in line with the existing development along Station Road.
- 3.17 In respect to its impact on harm to the Green Belt of the entire parcel P64 we consider that rather than being assessed as Moderate–High it should be assessed as Low–Moderate, and certainly no higher than Moderate.
- 3.18 LUC’s harm assessment reviews at a variety of scenarios looking at the impact when using varying combinations of the Stage 2 land parcels results in differing levels of harm. However, the comments made for the assessments of these scenarios do not necessarily match the grade of harm attributed.
- 3.19 For example, 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 Given the above comments we do not understand how LUC can grade the harm as Moderate. Given that WeG3 is enclosed on four boundaries and affected by the adjacent urbanising influences of residential development, a car repair works and allotments we consider a grade of Moderate-Low harm would have been more accurate. A similar situation exists for scenario P64b in which we consider it should have been graded as Moderate-Low harm.

#### **Summary of findings and conclusion**

- 3.21 Figure 4 indicates our re-assessment of the potential impact on harm to the Green Belt. However, even when considering their harm assessment (as illustrated on figure 3), none of the parcels being promoted around Welham Green cause high harm.
- 3.22 More importantly none of the parcels form essential Green Belt as supported by LUC's findings on page 62 of their final report.
- 3.23 Our re-assessment of harm only further indicates that development on the Welham Green Promoters' land would provide a sustainable solution to development to assist Welwyn Hatfield Borough Council's achieving their required housing numbers.