

**Welwyn Hatfield
Local Plan
Examination**

**Stage 3 Green Belt
Review Comments**

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On Behalf Of
Mr and Mrs Tubb Wallace**



1.0 INTRODUCTION

- 1.1 These comments are submitted on behalf of Mr and Mrs Tubb Wallace, Landowners of site HS15 in Woolmer Green, allocated under policy SADM29 for 150 dwellings.
- 1.2 Representations were made on behalf of Mr and Mrs Tubb Wallace at the regulation 19 consultation stage to policy SADM29 on a wide range of issues, including in regard to the role of the site in the green belt in the context of the findings of the Welwyn Hatfield Green Belt Review Stage 2 (2014).
- 1.3 Our representations queried the findings of the Review in terms of the contribution site HS15 makes to green belt purposes. We contended that a consideration of the site on the basis of the proposed site boundaries (rather than in terms of the larger parcel assessed) and taking into account the proposed mitigation, the assessment over stated the contribution site HS15 makes to green belt purposes.
- 1.4 These comments raise similar concerns with the recently completed Welwyn Hatfield Green Belt Study Stage 3.
- 1.5 **I confirm we are only submitting written representations in regard the November Green Belt session, we are not seeking attendance.**

2.0 SUMMARY OF GREEN BELT STUDY STAGE 3 FINDINGS FOR HS15

- 2.1 Local Plan allocation site HS15 forms part of parcel 3 within the study. The Appendix 6.1 assessment parcel 3 considers that the release of parcel 3 as a whole would cause very high harm to the Green Belt.
- 2.2 In terms of partial releases of parcel 3, Scenario P3c in Appendix 6.1 sets out that WGr1, which includes allocation HS15, would result in Moderate-High harm to the Green Belt.
- 2.3 The Study states, *“WGr1, which includes allocation HS15, is entirely open and its release would lead to encroachment on the countryside. However, containment by inset development to the south and west, and absence of strong settlement edge landscape features, means that it has a stronger association with the urban area and its release would not result in a significant extension of Woolmer Green’s settlement edge to the*



north. A new boundary would not represent a weakening of the Green Belt edge.”

3.0 CONCERNS WITH HARM ASSESSMENT

3.1 Task 5 of the Study considers the potential harm to Green Belt purposes from the release of land.

3.2 We consider that the assessment of harm in relation to the release of HS15 from the Green Belt is deficient because:

- No account is taken of the proposed new significant woodland buffer to the north of the site in the consideration of harm. The proposed new boundary treatment would represent a strengthening of the Green Belt edge.
- The study considers WGr1, rather than allocated site HS15. HS15 has different boundaries to parcel WGr1 - crucially HS15 does not extend as far north. The proposed boundaries of HS15, compared to WGr1, means the release would not result in any extension to Woolmer Green’s settlement edge to the north. This is relevant because as a result the release of HS15 has no influence on the perception of the gap between Woolmer Green and Knebworth, and also because the land comprised within HS15 makes a lesser contribution to protecting the countryside from encroachment. These points are expanded on further below:
- The assessment appears to be based on an assumption that the land between Knebworth and Woolmer Green to the east of the B197 is visually open. This is not the case owing to the topography between the settlements. As such, notwithstanding that HS15 would not extend further north than existing development, the nature of the landscape to the east of the B197 is such that a hillock between the settlements provides visual separation, with established vegetation on the southern edge of Knebworth contributing to this separation.
- The reduced extent of HS15 compared to WGr1 mean that HS15 as allocated is more closely associated with Woolmer Green, reducing the contribution HS15 makes to the protection of the countryside from encroachment.

3.3 The Study indicates (paragraph 3.82) that the assessment of overall harm is based on



professional judgement, taking into account the contribution of the site to Green Belt purposes, the effect of the release of the parcel on the wider integrity of the green belt and the strength of the revised Green Belt boundaries. We consider that in light of this the level of harm from releasing the site from the green belt should be lower than 'moderate-high'. Taken together, we consider the contribution that HS15 makes to the Green Belt has been overstated within the assessment.

3.4 The following text considers the above bullet points in more detail.

Northern Buffer

3.5 Policy SADM29 requires the establishment of a landscape buffer along the northern edge of HS15 to offset the impact of the development on the wider landscape and define the Green Belt boundary. The Stage 3 Study indicates that the current green belt boundary to the north of Woolmer Green has an absence of strong settlement edge landscape features. The provision of a new permanent landscape boundary feature (which we have proposed should be a woodland buffer established prior to development taking place) will improve the strength of the boundary in this location.

3.6 The assessment of harm takes account of three issues, one of which is the strength of revised Green Belt boundaries. The assessment of scenario P3c indicates a new boundary would not represent a weakening of the current green belt edge. We consider it would represent a strengthening and this should be given weight in the assessment of harm.

Comparative Extent of WGr1 and HS15 – Intervisibility

3.7 Our regulation 19 representations to policy SADM29 includes a Landscape and Visual Appraisal (LVA) that demonstrates that the rising hillock to the north of HS15 separates the site and Woolmer Green from the landscape to the north. The LVA notes (paragraph 6.7) that, *"The hillock acts as a buffer between the nearest edges of Woolmer Green and Knebworth providing visual separation of the two, and screening the southern edges of Knebworth from both the site and Woolmer Green. Established vegetation on the southern edge of Knebworth also contributes to this separation. This is a generally enclosed wooded landscape where woodland and the rolling topography restrict*



visibility.”

- 3.8 Further, more detailed analysis of the visibility of the HS15 within the landscape is contained within our regulation 19 submissions.
- 3.9 For the above reason we are concerned that the Study’s observation that the land to the east of the B197 is ‘visually open’ is misleading. The submitted LVA establishes that this is not the case.

Comparative Extent of WGr1 and HS15 – Countryside Encroachment

- 3.10 This reduced northerly extent of HS15 compared to WGr1 means that the entirety of the site is seen in the context of the existing urban edge of Woolmer Green to the south and west, and the sporadic development to the east.
- 3.11 As such, HS15 makes at most a partial contribution to protecting the countryside from encroachment based on the assessment criteria set out at table 3.5 of the stage 3 study. We consider there is a material difference between the extents of WGr1 and HS15 in this regard and this difference should be taken into account in the assessment of harm.

4.0 GREEN BELT HARM AND SUSTAINABLE DEVELOPMENT

- 4.1 We agree with the Study’s analysis of the role of the harm assessment in decision making at paragraph 7.8, namely that this must be considered alongside environmental and sustainability considerations. Green Belt harm is not determinative of development location and extent in its own right, as is clearly set out within the NPPF at paragraph 138.
- 4.2 Our regulation 19 representations set out the appropriateness of development at Woolmer Green and confirm the proposed release of HS15 comprises a sustainable form of development, as well as being acceptable in Green Belt terms.