



Historic England

EAST OF ENGLAND OFFICE

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Our Ref: PL00035518

18 September 2018

Dear Louise

### **Welwyn Hatfield Local Plan - Green Belt Review - Stage 3**

Thank you for consulting Historic England Welwyn Hatfield Local Plan Green Belt Review Stage 3. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

It is important to emphasise that, in view of the time constraints, we have not reviewed every green belt parcel in detail but instead, focussed on the methodology and broad conclusions in our response.

Paragraphs 3.40 - 3.42 and 4.38 - 4.40 refer to the fourth purpose of the Green Belt, that of the preserving the setting and special character of historic towns. The document seeks to define what constitutes a historic town and points to the PAS guidance which states that, 'This purpose is generally accepted as relating to very few settlements in practice'.

Over the years it has been made clear that this purpose is of especial importance to the Green Belts around the following six historic towns/cities:-

- . Bath
- . Cambridge
- . Chester
- . Oxford
- . York
- . Durham



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*We would refer you to an extract from Hansard 1988 Written Answer which seeks to clarify this:*

[http://hansard.millbanksystems.com/written\\_answers/1988/nov/08/green-belt](http://hansard.millbanksystems.com/written_answers/1988/nov/08/green-belt)  
*HC Deb 08 November 1988 vol 140 c148W*

*Mr. Frank Field*

To ask the Secretary of State for the Environment if he will include York, Chester, Bath, Oxford and Cambridge on a list of towns and cities whose green belts fulfil the purpose of preserving the special character of historic towns as laid down in planning policy guidance note 2.

*Mr. Chope*

Of all the green belt purposes listed in planning policy guidance note 2, that of "preserving the special character of historic towns" is especially relevant to the green belts referred to by the hon. Member.

Durham has been more recently added to this list.

However, that is not to say that this purpose has no relevance elsewhere. We note that paragraph 4.38 identifies Welwyn Garden City as the only settlement considered to form an historic town within this assessment. We broadly welcome this approach in relation to the Green Belt assessment. We would comment that it might be more precise to say that Welwyn Garden City (as founded by Ebenezer Howard) rather than 'designed' given that Louis de Soissons was responsible for the design in terms of the masterplan.

Paragraph 3.76 sets out the assessment criteria for Purpose 4. Again we broadly welcome this approach but note a minor typographical area in the 'Partial Contribution' which should read 'its', rather than 'is'.

Paragraphs 7.7 and 7.8 and 10.14 seek to clarify that Green Belt assessment is only part of the consideration of whether land will be released for development and notes that matters such as exceptional circumstances, and environmental and sustainability considerations will also need to be considered. This is helpful but we suggest that this section should be made clearer.

Perhaps the use of an example scenario would be helpful in better expressing what is meant. For example, a parcel of land may be assessed as having a lower level of harm to the green belt but may have major environmental constraints such as heritage or ecology and so on balance may be unsuitable for development and therefore not released from the Green Belt. Conversely it is possible that a site may have a high level of harm to the green belt but in view of the exceptional circumstances demonstrated and lack of other planning and environmental constraints may be considered appropriate for green belt release and allocation for development.

In part this matter is addressed in paragraphs 10.30 and 10.31 but we suggest that





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this should be more fully explained at the start of the report. It is really important that this point is fully appreciated. The release of land and allocation of land for development is more than just a question the fulfilment (or lack of fulfilment) of Green Belt purposes. This principle needs to be brought out more clearly in the report but also applied in the decisions subsequently taken on allocation of land for development within the emerging Plan.

We note the section on new settlement release suggests 2 areas (Royal Veterinary College and Danesbury) which could be considered as potential new settlement locations in respect of the Green Belt Review but goes on to conclude that it is unlikely that these sites would actually come forward as new settlements owing to other factors such as sustainability, deliverability and in these particular cases given the significant impact on local settlement gaps.

We welcome the reference in Table 10.1 to potential measures to mitigate harm to the Green Belt. In particular we welcome measures 6, 9 and 10.

In Table 10.2, reference should also be made to the potential beneficial use of the Green Belt as a means for the protection and enhancement of the historic environment.

Please note that the absence of a comment on a green belt parcel or document in this letter does not mean that Historic England is content that the green belt parcel or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Yours Sincerely

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