
WELWYN HATFIELD LOCAL PLAN EXAMINATION

**STAGE 5 – COMMENTS ON WELWYN HATFIELD BOROUGH
COUNCIL GREEN BELT STUDY STAGE 3**

**Prepared by Strutt & Parker on behalf of Ptarmigan Land and Mrs C
Horton 1974 Discretionary Settlement (ID 745197)**

September 2018

1.0 Introduction

- 1.1 At the end of the Stage 2 hearing sessions in October 2017, the Inspector of the Welwyn Hatfield Local Plan identified a need for further work in relation to the Green Belt.
- 1.2 The Inspector's letter dated December 2017 asked the Council to submit evidence to the examination identifying which parts of the Borough's Green Belt are 'critical' to retain. It was also stated that "a finer grained approach would better reveal the variations in how land performs against the purposes of Green Belt" and that openness considerations in a Green Belt context should only be concerned about the absence of built development and other dominant urban influences. The letter also noted however that the study should consider sites in relation with the rest of nearby countryside including topographical considerations. It is notable that the Inspector agreed with the need to consider exceptional circumstances that justify the release of each major site or group of sites in a particular locality recognising the importance of local circumstances when considering green belt release.
- 1.3 We note that the Stage 3 Assessment Report now published by WHBC expands on the coverage of the Stage 2 Green Belt assessment to identify the degree of harm to the Green Belt that may result from its release and therefore identify which areas are most essential to retain or could be considered for release.
- 1.4 We support the three main aims of the Green Belt study that are stated as:
 - To undertake a comprehensive and rigorous assessment of the Green Belt to establish which areas are 'most essential' to retain; and which areas, if developed, could have less harm on the Green Belt.
 - To review the existing 'washed over' settlements and consider the extent to which they contribute to the openness of the Green Belt and whether there is any justification in terms of their openness (or lack of) to inset them.
 - To assess the contribution to the Green Belt purposes of all land within the Borough to establish if there are any areas of weaker performing Green Belt that may be more suitable (in Green Belt terms) for a new settlement.
- 1.5 The Inspector's December 2017 letter makes clear that a Green Belt review is needed as a result of the development strategy failing to meet the full objectively assessed housing needs, and notes the development strategy remains a matter for the Council. In this context the purpose of the Green Belt review could be seen as to identify if there are further opportunities for Green Belt release that would meet the requirement for exceptional circumstances for release rather than to question or review the Council's proposed development strategy of sites identified for allocation within the submitted plan.

2.0 Comments on Section 2 – Policy Context

- 2.1 We note that reference is made to the revised version of the NPPF 2018.
- 2.2 Paragraph 214 of the revised NPPF states that the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before January 2019.
- 2.3 As the Welwyn Hatfield Local Plan has already been submitted it is our understanding that examination would continue under the provisions of the previous Framework. We would suggest the references in the Council's GB report are either updated or further clarification is issued as to the relevant national planning policy considerations ahead of the publication of the Inspector's matters and questions for the stage 5 examination hearings. This will allow for ease of reference at forthcoming examination hearing sessions.

3.0 Comments on Section 3 – Methodology

- 3.1 Whilst the NPPF clearly sets out the five purposes the Green Belt and highlights the need for Green Belt boundaries to be assessed and reviewed through the Local Plan process, neither the NPPF, nor supporting National Planning Practice Guidance or any other relevant government publication, provides clear guidance on how to prepare a Green Belt methodology.
- 3.2 As no guidance is provided as to how an assessment should be undertaken, we agree with LUC as to the need to develop clear definitions and criteria for each purpose in order to assess how the Green Belt functions and fulfils the five defined national purposes of Green Belt. We note the Inspector's letter dated December 2017 also refers to examples of Green Belt assessments undertaken elsewhere as an example of green belt review in the context of meeting housing needs.
- 3.3 The methodology adopted in the LUC report is generally supported. It is notable that this has been undertaken as an independent review.
- 3.4 The individual scenarios assessed as part of the assessment of harm have not been individually assessed against the five nationally defined purposes of Green Belt or the identified Local Green Belt purpose. Should these sites/scenarios be assessed separately it could give a better idea as to the value of each site/scenario.

Task 4: Assessment of the contribution to the Green Belt purposes

- 3.5 The assessment criteria used to undertake the assessment of contribution to the Green Belt purposes is broadly consistent with the assessment approach used for the Stage 2 Green Belt review.
- 3.6 The Planning Advisory Service's (PAS) 'Planning on the Doorstep' guidance for Green Belt Assessment outlines considerations to be made in relation to the five nationally defined purposes of Green Belt. In relation to Purpose 3 - to assist in safeguarding the

countryside from encroachment, PAS emphasise the need to look at the difference between land under the influence of the urban area and open countryside. When determining the land that should be attempted to be kept open, open countryside should be favoured. LUC's methodology considers the characteristics of open countryside and any urbanising features which might be present within the landscape. In the context of south Hatfield existing development (park & ride, cemetery, school, industrial estate and New Barnsfield Resources Centre) to the south of the A1001 will therefore be a relevant consideration.

- 3.7 Every site/scenario assessed receives a rating of 'significant contribution' in relation to Green Belt Purpose 5. This is supported by the PAS advice note issued which states: *..."it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose."*
- 3.8 There were 95 assessment parcels identified as part of the assessment, these include, within them, the 67 sites reviewed in the Stage 2 Study, and the 10 sites assessed in the Stage 2 Addendum. It was concluded that identifying parcels around these sites would again lead to overly complex shaped assessment parcels.
- 3.9 The parcelling system used seeks to reflect variations in harm that might result from either constraining development to a smaller area than the parcel as a whole or, reflecting the need to consider cumulative impact, from expanding development to adjacent areas. We consider this is particularly important in the context of land to the south of Hatfield, which as recognised in the report has an urban fringe character as a result of existing development to the south of the A1001. This includes the park and ridge, cemetery, school and New Barnfield Central Resources.

Task 5: Assessment of the potential harm to Green Belt purposes from release of land adjacent to inset, or potential inset, settlements

- 3.10 We support the need for the assessment of potential harm resulting from the release of land adjacent to settlements. When carrying out this assessment it is of course important to note that the release of any Green Belt is likely to result in some degree of harm and this will of course need to be considered against the exceptional circumstances that necessitate a review of Green Belt in order to meet identified housing needs within Welwyn Hatfield Borough.
- 3.11 The assessment of the potential harm considered the following three criteria
- The contribution across the area of potential release/development to the NPPF Green Belt Purposes.
 - The potential implications of the loss of openness within the area of potential release/development on the integrity of the wider Green Belt.
 - Consistency and strength of the Green Belt boundary/urban edge in relation to the potential area of Green Belt release/development.

- 3.12 We are generally in support of these criteria in terms of Green Belt harm.
- 3.13 We note that the assessment of harm does not take into account other factors such as the sustainability of the site. It is therefore important the Green Belt review is considered as one factor in the decision on the allocation of sites. This is of course recognised in the Inspector's letter from December 2017 stating that "the actual development strategy finally arrived at is a matter for the Council, providing it is arrived at in a way that is objective and rational".

Task 7: Identification of the land that is most essential in terms of its contribution to Green Belt purposes

- 3.14 The identification of 'very high harm' areas that can be considered most essential in terms of contribution to Green Belt purposes is supported as a methodology. Given the extent of housing needs within the Borough, it is considered this provides a useful method of identifying land on which allocations should not be made due to Green Belt constraints. Within the rest of the Borough, Green Belt considerations can then be considered alongside other relevant planning considerations when determining development strategy for allocation.

4.0 Comments on Section 4 – Strategic Assessment of Green Belt Role

Purpose 2: Preventing Neighbouring Towns from Merging
Paragraph 4.32, Hatfield to Potters Bar

- 4.1 We note that reference is made to the size of existing gaps between settlements. The role that land plays in preventing the merging of towns is more than a product of the size of the gap between settlements. Green Belt land can play both a physical and visual role in preventing the merging of settlements. This accords with PAS guidance (Planning on the Doorstep: The Big Issues – Green Belt: Feb 2015) which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another.
- 4.2 Physical proximity is the initial consideration, but both built and natural landscape elements such as topography can act to either decrease or increase perceived separation. i.e. intervisibility is a crucial component.
- 4.3 The importance of intervisibility, character and topography is at presently not adequately addressed in the Council's Green Belt report. This should be a consideration for the assessment of site 56a in particular as covered later in these comments.

5.0 Paragraph 4.42, Local Purpose: to maintain existing settlement pattern

- 5.1 We note this is identified as a local purpose rather than within national policy. The Inspector's December 2017 letter states "Given that 'maintaining the settlement

pattern' is a local consideration and not one of the five Green Belt purposes, it is arguable whether or not it should be given the same weight as the others but that again is a matter of rational objective judgement." The Hertfordshire Structure Plan is referenced by the Inspector and the need for distinct and diverse communities. We consider this need to be relevant when considering this purpose rather than just the physical size of gaps.

- 5.2 With regards to the gaps between Hatfield and Welwyn Green in particular it is noted that the settlement of Welham Green lies beyond the ridge to the south. Land closest to Hatfield and South Way including the proposed allocation at site HS11 is therefore separated from Welham Green by the ridgeline, open land, including a substantial wood which is designated as a wildlife site.
- 5.3 The north-facing land within Site HS11 does not contribute to maintaining the visual perception of the gap between Hatfield and Welham Green and intervisibility between the two settlements is prevented by topography and strategic vegetation (existing and proposed) along the ridge line. Looking north from Welham Green, there will be no increase in the extent of visible development. From the high ground, views north would reveal views of open land, with the development and Hatfield beyond. The role of land to the north of the ridgeline means that its potential development would not close the gap in visual or physical terms. The remaining gap would still be ample and more than sufficient to substantively separate the two settlements and ensure that no additional coalescence to that of the industrial estate is created in visual terms.
- 5.4 Whilst we are generally supportive of Figure 4.1 and the gaps identified we therefore consider that the fragile gap (yellow arrow) shown to the south of Hatfield would be more appropriately drawn further to the south to include the land beyond the ridgeline and encompass the land identified as absolute constraint. A plan indicating the proposed ridgeway route is included with this submission.

6.0 Comments on Section 6 – Contribution Assessment Findings

Parcels 55 and 56

- 6.1 Green Belt Purpose 1 is to check the unrestricted sprawl of large built-up areas. When looking at the Stage 3 Green Belt Assessment, it is supported that Parcels P55 and P56 have been assessed as making a limited or no contribution to this purpose as both parcels are sufficiently separated or distant from large built up areas for there to not be any potential for urban sprawl from the large built up areas.
- 6.2 Green Belt Purpose 2 is to prevent neighbouring towns from merging into one another. The Stage 3 Welwyn Hatfield Green Belt Assessment has judged P55 to make a partial contribution to this purpose. The reasons given are that the parcel lies between the settlements of Hatfield (which it adjoins directly to the north) and Potters Bar (to the south east), with both being first tier settlements. These settlements are located within approximately 4.5km of each other across the parcel. The parcel itself is deemed to play a partial role in inhibiting the perception of the merging of the towns.

- 6.3 P56 has also been judged as making a partial contribution to Purpose 2. The reasons given are that the parcel also lies between the settlements of Hatfield and Potters Bar. With the settlements located approximately 4.5km from one another, the parcel forms a hill towards the central portion which comprises mostly of arable land with woodland blocks. With the settlements of Welham Green, Brookmans Park, Swanley Bar and Little Heath lying between these first-tier settlements, any development would limit the perception of separation. The extent of connectivity between Hatfield and Welham Green along the A1001 also limits the contribution of this parcel to preventing the merging of Tier 1 settlements.
- 6.4 Green Belt Purpose 3 is to assist in the safeguarding of the countryside from encroachment. The Stage 3 Welwyn Hatfield Green Belt Assessment has judged P55 to make a significant contribution to this purpose. The reasons given are that the land contains characteristics of open countryside, predominantly comprising arable fields. The hard-standing and flood lights for the park and ride car park have some impact on countryside character but lack a strong association with the urban edge due to the separating belt of woodland and grassland around the A1001. The appendices additionally consider P55a which states that harm resulting from release of the park and ride would be less than would result from release of the site as a whole. It is also stated that “Likewise the cemetery’s urban fringe character means that its release would not increase harm”.
- 6.5 P56 has also been judged as making a significant contribution to Green Belt Purpose 3. Most of this parcel contains the characteristics of open countryside, comprising predominantly of grassland fields, but openness is compromised at the eastern end of the parcel by the school and vacant New Barnfield Resources Centre and also by the influence from the built form of Hatfield, which the north facing slopes face on to
- 6.6 P55 and P56 are judged to make limited or no contribution to Green Belt Purpose 4 – to preserve the setting and special character of historic towns. The reasons given are also that the land forms little or no part of the setting of Welwyn Garden City which in turn does not contribute to its special character.

7.0 Comments on Section 7 – Harm Assessment Findings

- 7.1 As stated within the Stage 3 Green Belt Assessment, *“without a clear definition of the scale, type and design of development which will come forward for development within a specific Green Belt location, the harm assessment is based on the assumption that the openness (in Green Belt terms) of a defined area will be lost. This approach ensures a consistent approach is adopted across the study area”*. The assessment of harm does therefore not include any of the landscaping along the proposed ridgeline route to the south of HS11.
- 7.2 The Council’s Stage 3 Green Belt Assessment determines the release of the whole of P56 to result in a high level of harm. This is a larger parcel of land extending further to the south than the current allocation proposed at site HS11. Development proposals on this wider area are not being pursued by our client nor are they proposed within the submitted Local Plan. The assessment of high harm in relation to this parcel is stated

to be as a result of it being largely open and rural in character and development of the whole parcel would constitute as encroachment on the countryside. The assessment whilst noting the A1001 constitutes a strong boundary also notes that it is one that has been breached by the industrial estate, New Barnfield Central Resources library, school, cemetery and park and ride.

- 7.3 The release of P55a (release of the park and ride area in isolation, or in combination with the cemetery and the P56a area to the east) is assessed in the Council's report as resulting in a moderate-high level of harm. The recognition of the urban fringe character of the land to the south of the A1001 is particularly supported. The report states that 'Any development across the A1001 would represent a weakening of the existing Green Belt boundary and encroachment on the countryside, but the park and ride's well-defined boundaries, non-rural use and extent of separation from Welham Green, mean that harm from release would be less than would result from release of the site as a whole. Likewise the cemetery's urban fringe character means that its release would not increase harm'.
- 7.4 The release of Site HS11 and the Cemetery and Park and Ride has also been assessed as part of scenario P56a. Site HS11 has also been reduced in size and located only on the north facing slope below the ridgeline. This scenario also receives a moderate-high harm rating in the Council's assessment. The reduction in harm recognises the extent of existing development and urban fringe character of land immediately to the south of the A1001.
- 7.5 As previously stated, a weakness of the Stage 3 Assessment is that it does not assess each individual parcel/scenario against the five nationally defined purposes of Green Belt. The Inspector stated as part of the Local Plan Examination Green Belt Review that intervisibility was a key factor in determining harm in reference to Purpose 1. The landscape and visual effects of development within HS11 would be minor as long as the extent of development was limited to the north facing land. When this is considered the release of land within P55a or P56a is therefore likely to result in a moderate, rather than slight, reduction in harm. This scenario should be assessed as a moderate harm rating.
- 7.6 Scenario P56b, release of the developed eastern section of the parcel, is judged to result in a moderate level of harm. The supporting text states that *"the extent of development at New Barnfield, and its proximity to large scale, inset commercial development, reduces the harm that would result from release of the eastern part of the parcel, but a widening of the inset link between Hatfield and Welham Green would nonetheless harm settlement separation and weaken the contribution of adjacent Green Belt to the west"*. Intervisibility is a key criterion in determining a site's contribution to Purpose 1.
- 7.7 The Green Belt assessment through the scenarios therefore reflects the extent of existing development to the South of the A1001. This reduces any harm that would result from Green Belt release in this area, and the area cannot be considered one of the most essential areas of green belt nor to form an important part of the gap between Hatfield and Welwyn Green. A revised green belt boundary can be provided in a robust

form to the south of these existing uses and proposed allocation, and we have previously submitted proposals for a ridgeway green infrastructure link in this regard.

- 7.8 We are supportive of the recognition of the extent of existing development to the south of the A1001 in the Council's report. We believe it is important however that consideration is given to new green belt boundaries that could be provided. In the case of land to the south of Hatfield this would run to the south of existing developments at the park and ride and cemetery. This includes potential to provide for a strong ridgeway boundary which would also represent a robust and defensible green belt boundary. This has previously been described in our submissions and is additionally indicated on the enclosed plan.

8.0 Comments on Section 9 – Identification of 'Most Essential' Green Belt

- 8.1 We support the identification of areas of most essential Green Belt. Given the scale of housing need and the need for consideration of wider issues when determining development strategy this approach allows for identification of those areas where very high harm would result. Parcels 55 and 56 are not identified as 'most essential' Green Belt and therefore the consideration of Green Belt release in these areas remains appropriate as part of the Council's development strategy.
- 8.2 We note that the parcel has been split into three options. This recognises that there is existing development beyond South Way (A1001) and that this area has a urban fringe character, different to that of land further to the south within the gap to Welwyn Green.

9.0 Conclusion

- 9.1 The Green Belt Assessment is generally supported and provides an evidence base of most essential Green Belt which should be avoided when considering the potential for allocation of further sites within the emerging Local Plan.
- 9.2 We note that the assessment of harm does not take into account other factors such as the sustainability of the site. It is therefore important the Green Belt review is considered as one factor in the decision on the allocation of sites. This is of course recognised in the Inspector's letter from December 2017 stating that "the actual development strategy finally arrived at is a matter for the Council, providing it is arrived at in a way that is objective and rational".
- 9.3 At present the assessment, particularly with regard to green belt purpose 2 overly focuses on quantitative issues such as distance of separation. It does not take sufficient account of existing topography and proposals in respect to the key issue of intervisibility between settlements. Existing vegetation along the ridge will be reinforced by new planting in the form of a pedestrian/cycle 'green lane' minimising potential visual effects and maintaining an open, green skyline in views from Welham Green.
- 9.4 Whilst we are generally supportive of Figure 4.1 and the gaps identified we consider that the gap (yellow arrow) shown to the south of Hatfield would be more appropriately

drawn further to the south to include the land beyond the ridgeline and encompass the land identified as absolute constraint.

- 9.5 The Green Belt assessment through the scenarios reflects the extent of existing development to the South of the A1001. This reduces any harm that would result from Green Belt release in this area, and the area cannot be considered one of the most essential areas of green belt nor to form an important part of the gap between Hatfield and Welwyn Green.
- 9.6 We are supportive of the recognition of the extent of existing development to the south of the A1001 in the Council's report. We believe it is important however that consideration is given to new green belt boundaries that could be provided. In the case of land to the south of Hatfield this would run to the south of existing developments at the park and ride and cemetery. This includes potential to provide for a strong ridgeway boundary which would also represent a robust and defensible green belt boundary. A revised green belt boundary can be provided in a robust form to the south of these existing uses and proposed allocation, and we have previously submitted proposals for a ridgeway green infrastructure link in this regard. Further details are shown on the enclosed plan.