

From: "Scott Sibuns" Subject: Comments on Welwyn Hatfield Local Plan Stage 3 Green Belt Review. Parcel P78  
Date: 14 September 2018 at 10:14:31 BST  
To: "'PO Services'" <louise@poservices.co.uk>,  
<louise@poservices.co.uk>

Dear Louise,

Thank you for your notification of the publication LLC's Green Belt study. I find the summary of findings in Section 9.4 of the Final Report regarding the seven Most Essential Green Belt a reasonable attempt to define the essential areas. However, subdividing of the seven identified Green Belt parcels into different "Harm" categories is not supported by the analysis presented in the appendixes which consider the parcels in their entirety .

The seven Most Essential Green Belt areas should retain their "Very High" harm ratings in their entireties (as defined by the original land parcels in the Appendixes).

### **Specific Comments on P78**

The analysis of "The gaps between Welham Green, Brookmans Park and Potters Bar" (most of P65 and part of P78)" is particularly flawed. The assessments of Parcel P78 as "Very High" harm is well supported by the report and I support its findings. However, the creation of P78a & P78b, which are then assessed as only "High" harm while not even separately called out in Table 6.1 "summary Table of contributions to Green Belt Purposes" but appear in Table 7.1 "Green Belt Assessment of Harm Ratings" is arbitrary and not justifiable. The comments on the assignment of only "High" harm ratings to these sub sites is not supported by the scenario comments regarding the parcels in the Appendix. The comments offer no explanation as to why removing these sub parcels will still leave the remaining part of P78 providing "Most Essential" areas of Green Belt. In fact the analysis and comments only confirm their importance in preserving separation and significantly contributing to the "Most High" harm rating for P78 as a whole.

The proposed boundary between the part of P78b and the remainder of P78 shown in Figure 9.1: “Areas of Most Essential Green Belt (in EX66C Figures)” is exceptionally weak. Any change in the Green Belt boundaries should be sustainable and defensible and should produce a new Green Belt boundary that is not arbitrary or likely to be subject to erosion. The part of P78b indicated is one field in an otherwise open field pattern. The proposed northern boundary is exceptionally weak, being wire fences or small hedgerows in-between fields that could be removed in a matter of hours. There are no natural landscape boundaries to contain the site. In fact the identified area is probably the least defensible site of any of those that have been examined in Little Heath or Brookmans Park. Even the October 2014 site assessment (when this area was considered as BrP7) says “... boundary would be weaker than existing (Green Belt) boundary”.

The inclusion of only the central part of P78 is wholly unjustified based on the analysis and is a clear distortion of the report findings. The proposed boundary is completely indefensible. The whole of P78 should retain the “Very High” harm ratings and be designated “Most Essential” Green Belt.

It would also appear worth noting that the Folly Arch at Swanley Bar, which has been used for the cover photograph of the report, is directly adjacent to Parcel P78 . Failure to designate the whole of P78 as “Most Essential” harm will destroy the “Green Belt” environment that this picture conveys.

Scott Sibuns

