

Dear Sir / Madam

**Re: Welwyn Hatfield Local Plan EiP – GB Study**

Thank you for the opportunity to comment on the Welwyn Hatfield Local Plan EiP Green Belt Study.

**St Albans City and District Council (SADC) comments**

1. Generally, in the context of needing to find options for additional residential development and to re-examine the flawed concept of the Symondshyde village proposal, SADC welcomes this new, detailed, evidence study. Overall the methodology and conclusions appear to offer, in most instances, an appropriate response to the initial conclusions / questions on Green Belt issues and the relevant WHBC Local Plan proposals set out by the WHBC Local Plan Inspector as part of the Plan's Examination (Inspector's Comments on Green Belt Review from Stage 2 Hearing session October 2017). Overall the new Study makes some good links to the methodology and general conclusions of the previous joint Green Belt Review (with SADC and Dacorum Borough Council). On that SADC appreciates the efforts made by WHBC.
2. However SADC has the following comments on, and significant concerns arising from, its consideration of the new evidence:
  - Approach / Methodology
    - i) The general approach is to examine urban inset edge land in detail, (assessing Green Belt contribution and the potential impact of development in those locations on Green Belt purposes), then to look at the wider Green Belt as a separate exercise; in case there is a need to locate a new settlement within the Green Belt:

*Para 3.93 Having assessed the washed-over settlements and land adjacent to the inset edges, an assessment was undertaken of the contribution that all remaining land within the Borough makes to the Green Belt purposes. This sets out the variation in performance of Green Belt land away from the inset areas and gives an indication of which areas make a stronger or weaker contribution to the NPPF Green Belt purposes and hence may be more or less suitable in Green Belt terms as a new settlement location.*

This appears to be a reasonable approach, but it does entail overlap, and potential consistency problems, in relation to the joint strategic GB review.

The method seems to be confused / contradicted in respect of the area between Hatfield and St Albans / Harpenden / Wheathampstead; where it is important to look across the District boundary at all significant settlements in SADC when considering purpose 2 (merge). The detailed parcel assessment approach is applied in some areas (parcels 44 and 45) that are not urban inset edge land. They are parcels that appear to be predetermined by the Plan proposal for a new settlement at Symondshyde. This results in unevenness in the method and incorrectly influences the conclusions drawn (see below).

ii) The wider Green Belt assessment (for potential new settlement impacts) is suggested as being on purposes 2 (settlement merge) / 3 (Countryside).

For new settlements there are many choices about location. It is possible to enlarge / intensify existing small settlements washed over by Green Belt, or use largely undeveloped locations. Both create new situations in terms of gaps between urbanised areas and countryside impact.

On Purpose 2, (merge) and its assessment of gaps between settlements urban areas, the importance of the related local purpose to the methodology appears to be ignored. This is especially apparent in respect of the gap to Harpenden and the significant intervening inset settlement of Wheathampstead (approximately 4 km from the Hatfield urban edge). Wheathampstead is a large village of approximately 6,000 people, inset from the Green Belt. The justification for this is set out as:

*Para 8.10 An assessment has not been undertaken of the variations in the wider Green Belt in relation to the Local Purpose as in line with the Inspector's comments, it is the National NPPF purposes which hold greater weight and the establishment of a new settlement may require an acceptance of some change to the local settlement pattern.*

That a particular proposal may eventually justified, even though it impacts badly on this purpose, is not a convincing reason for failing to assess and understand that impact, including in a cross boundary context. If the local purpose is ignored in this wider assessment, it is not justified to include it in the urban edge assessment either. Without even an assessment of this central issue of gaps between settlements, it is not possible to say that the wider Green Belt impacts of possible new settlements are properly assessed.

iii) On Purpose 3 there is no effective differentiation of areas assessed, yet there are very substantial differences in the Green Belt character of these areas in terms of their countryside role / the existing degree of urbanisation:

*Para 8.7 Figure 8.2 shows the findings of the assessment of contribution to Purpose 3 for all areas within the Borough, including the wider Green Belt. This shows that virtually all the wider Green Belt makes a strong contribution to Purpose 3 with the exception of the area around the Royal Veterinary College and Danesbury (the area between Codicote and Welwyn). These areas do not perform so highly against Purpose 3 due to the greater degree of existing development that has taken place.*

As an important example, the area between Welwyn / Hatfield settlements and Harpenden / Wheathampsted is one of the few remaining substantial 'countryside' areas, yet it is treated in the same terms as semi urbanised areas such as, for example Bullens Green, Ayot Green, or Woodside / Wildhill. The Study recognises countryside character is an important factor in Green Belt protection and it should certainly be assessed when considering location of new settlements.

Overall it appears that the merge / local settlement gap and countryside encroachment issues are insufficiently analysed and differentiated:

*Para 8.2 In summary, the areas which make limited or no contribution to Purpose 2, and the two areas which only make a partial contribution to Purpose 2 and 3 (the Royal Veterinary College and Danesbury), are the weaker performing areas of the wider Green Belt that could be considered for potential new settlement locations.*

Specific parcel analysis related to the Plan new settlement proposal at Symondshyde *only* is not a methodologically sound substitute.

- Green Belt between Welwyn / Hatfield and Harpenden / Wheathampstead  
Both the edge parcel assessments (44 / 45) and the wider Green Belt analysis in the Study, seriously underplay the value of Green Belt protection in this area. The wider assessment is addressed (as an example) under methodology above. For the specific parcel assessments the comments below apply.

Purpose 2 (merge) and the local purpose the ratings (partial / limited or no contribution) are flawed because they do not take proper account of the cross district boundary gaps to Wheathampstead (a sizeable inset settlement) and Harpenden. The gap to Wheathampstead is just 4km and would be approximately halved by a new settlement development as proposed in the Plan the justification of these ratings within in the urban edge assessment.

The contribution rating in respect of purpose 3 (countryside) is correctly 'significant' but this conclusion is devalued when it is realised that the same

conclusion is drawn for the majority of the non-urban edge parts of the District (see comments above about cross district differentiation). It would be more appropriate to say this area is very significant in terms of countryside.

'Deeper' countryside areas such as this are very different in character to peri-urban parts of the District and recognising this this would introduce appropriate differentiation to assist in decisions about location of new settlements. This issue was dealt with in the joint Green Belt Review by quantification of the degree of built development present (see Joint GBR Purposes Assessment 2013).

The parcel assessment for this area does not recognise the interplay / interdependence of the countryside purpose with merge / separation of settlements (under purpose 2). Though deeper countryside areas are inevitably further from settlement edges, within the wider gaps between settlements, it is for that reason that they serve an important Green Belt purpose in separating settlements and preventing merge. The introduction of a significant new development area into such a location not only encroaches on countryside of higher order, it also creates new, gap and separation problems, as each side of the new development becomes a narrower gap. This appears crucial to the Symondshyde new settlement issue where the 4km gap between Wheathampstead and Hatfield would be reduced to two 2 Km gaps, one in each direction. This issue is not reflected in the analysis.

The lack of assessment of this issue is illustrated below in the Parcel Assessment extracts below:

*Parcel 44*

*Preventing merge...*

*The parcel abuts the north-western edge of Hatfield and at its nearest edge is only a little over 1km from the south-western edge of Welwyn Garden City, however the two towns are already only 1km apart across the Lea Valley to the east of the parcel, and openness within the river valley is the key component of settlement separation. Intervening urbanising development at Stanborough adversely affects Welwyn Garden City's relationship with the wider countryside, but there is sufficient distinction across the Lea Valley between Welwyn Garden City and Stanborough for the settlements to retain a sense of distinction.*

*The settlements of St Albans and Welwyn Garden City are located within approximately 5.4km of each other in this area but proximity of the two towns further to the south, and the barrier role played by woodland to the west of the parcel, limit the parcel's role in their separation.*

*Local Purpose*

*The parcel is in close proximity to the north western edge of Hatfield. It does not lie directly between two settlements which are inset into the Green Belt and which are being considered in relation to the local purpose.*

*Parcel 45*

*Preventing merge...*

*The parcel lies slightly to the north of the direct gap between Hatfield and St Albans, and is further from the latter than most of the existing urban edge of Hatfield to the south. The woodlands which frame the site further diminish its relationship with St Albans, and also preclude any significant role in the c.5.4km gap between Welwyn Garden City and St Albans, or the wider gaps between these two towns and Harpenden.*

*Local Purpose*

*The parcel is too distant from any smaller inset settlements to make any contribution to this purpose.*

This raises the fundamental question - what about Wheathampstead? As mentioned above, this is a large village of approximately 6,000 people, inset from the Green Belt.

Figure 9.1 'Areas of Most Essential Green Belt' further illustrates the problem of the study conclusions in this area. The lack of a 'Most Essential' area protecting the undeveloped gap to Wheathampstead is stark and shows inconsistency in relation to other urban edge areas. Parcels 44 and 45 should be reclassified as making a significant contribution to purpose 2, and thus as 'most essential'. In the Assessment of Potential Harm Figure 7.1 the 'moderate – high harm' assessment is correspondingly too low.

It should be noted that the relevant parcel assessment in the Joint GBR was that this area significantly 'contributes to the strategic gap between Welwyn Garden City and Wheathampstead'.... 'displays typical rural and countryside characteristics...there is very limited evidence of built development and no significant encroachment'.

For internal and cross study consistency this area should be reassessed as part of the wider Green Belt part of the study – rather than as an edge area.

- St Albans - Hatfield gap

The overall analysis of this as a 'fragile' gap is strongly supported. This conclusion suggests that some of the suggested Plan development options for the west side of Hatfield may need re-consideration in light of their serious Green Belt impacts.

The assessment of potential harm rating for development in this area seems too low (at moderate / high). Similarly the narrowness of the gap suggests that all the parcels in this area should be classified as Areas of Most Essential Green Belt.

- Alternative Green Belt release / development options

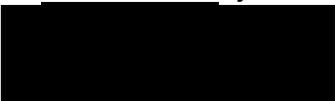
The overall analysis in the Study suggests that there may well be options for Green Belt release that have lower Green Belt impacts than the current Plan proposals (in particular in the south of the District around Welham Green and Brookman's Park, where there is also good rail access and east / SE of Welwyn and Welwyn Garden City with access to rail and significant services and infrastructure). This needs careful consideration through the Plan process.

- Bullens Green / Roestock area (within Welwyn & Hatfield) – Parcel 53 / 54 (including classification of 'washed over' settlement)

On the basis of the new Green Belt evidence alone (as presented), this may be one of the areas considered by WHBC. This would have implications for SADC / WHBC boundary considerations and approaches to settlement classification and would need to be considered through DtC in relation to both the WHBC Local Plan and the draft St Albans Local Plan. It is noted that some of the ratings for this area seem somewhat surprising.

For the avoidance of doubt, SADC continues to object to the proposed inclusion of the Symondshyde village proposal.

Yours faithfully



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