

## Welwyn Hatfield Green Belt Study Stage 3

### Comments by Water End Residents Group

BY EMAIL

Mr M Middleton - Planning Inspector  
C/O Louise St John Howe Programme Officer  
PO Services  
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Sudbury, Suffolk  
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Dear Mr Middleton,

The Water End Residents Group fully supports the assessment that Water End should be retained as a washed over settlement.

We wish to make the following comments with specific regard to the Brookmans Park assessment parcels P65, P66, P67-72 and P78.

#### 1) Independence

Page 4 of examination document EX67 (*Letter from WHBC to Inspector: Update on programme of work (EX66) including note on scope of work of review of Green Belt*) states:

*“Independent consultants, LUC, have been appointed to carry out the additional Green Belt work. Their programme indicates that the final report will be available for publication in mid-June. **The Council has received a number of Green Belt assessments of individual sites, these have not been passed onto the consultants as the Council consider it important that the review is independent and that the Consultants form their own view of the significance of individual parcels of land.”***

The final report was due for publication in mid-June, but was in fact not published until 24 August. We contacted WHBC on the 21 June to enquire as to the likely publication date, and were advised by Colin Haigh that WHBC were *“still liaising with the consultants, but hope it will be complete by the second half of July”*.

We contacted WHBC again on 08 August, and were advised by Colin Haigh that *“We are still finalising the study with our consultants. We hope it will be ready to publish by mid August”*

It is clear when looking at page two of the Final Report (Document EX88B) that the draft was completed by 21 May 2018, but it was not until the 23 August that the updated final report was completed.

The brief from WHBC to the consultants was comprehensive and explicit, and we question why the Borough Council needed to enter into such protracted dialogue with the consultants. We also question how truly independent the report actually is after three months of 'liaising' and 'finalising' with WHBC.

In order to preserve the independence and objectivity of the Review, the Borough Council did not allow any input from Regulation 19 representors or their consultants, but apparently had extensive input themselves; the net result appearing to be a Review that accords with the submission Local Plan.

## 2) Consistency

- a) We note that some parcels have been broken down and assessed with various development scenarios, including the development of the Stage 2 site only, and other parcels have not.

Example:

P72 (Stage 2 site BrP1) has been assessed in isolation (in association with the inseting of P68)

P65 (Stage 2 site BrP4) has been assessed as part of P65 and in isolation (P65a)

P66 includes individual site assessments for Stage 2 sites BrP12, BrP13 and BrP14

In contrast, the following parcel is assessed with various development scenarios, but not all the Stage 2 sites have been assessed in isolation.

Example:

P78 assesses allocation site HS25 in isolation, but does not assess Stage 2 sites BrP6, BrP9 and BrP10 in isolation. Instead, they are assessed as a group (P78a)

We do not agree with the assessment of Scenario P78a (Appendix 6.1 page 354) which states that Stage 2 sites BrP6, BrP9 and BrP10 would have the same degree of harm (high) individually or combined. Instead, we suggest that it is likely the harm would be less for an individual site than as part of a combined, larger site, particularly if development stopped short of the Hawkshead Lane ridge crest as suggested by the consultants.

The assessments within the Review are a key piece of evidence that will be used by the Council to either support the allocation of sites which are least harmful, or justify the non-inclusion of sites assessed to be harmful. We consider that in order for the Review to be

consistent and entirely accurate that all the Stage 2 sites should be assessed in isolation, or that all the parcels should be assessed without any further breakdown.

- b) We question why the railway line and platform have been included within the south east part of P65, and therefore within the assessment of the parcel, whilst the railway line has not been included in nearby P78 or its assessment.

### 3) **Visual Separation**

You will recall that during your meeting with the Council on Friday 27 October 2017 you commented that another concept in assessing which areas of the Green Belt need to be kept permanently open is “*whether you can actually see the settlements on the other side*” and “*If you’ve got a big hill in the way then it is not as critical than flat fields where you can see for two or three miles*”.

We note that in Para 3.71, one of the key questions asked in relation to the local purpose is whether there is strong intervisibility between the settlements, and we are surprised that this criteria does not seem to have been used when assessing the various parcels, particularly P65a.

We disagree with the rating of P65a as high, and argue that it should be considered as very high as it clearly makes a significant contribution to the local purpose as defined by Table 3.7: Local Purpose assessment criteria contained in Para 3.79:

*“Land that plays a highly significant role in inhibiting the physical or visual coalescence of inset settlements, such as narrow gaps that are visually open with few separating features.”*

### 4) **Strategic Role**

We welcome the inclusion of Figure 4.1 in the study. However, we note that the strategic, fragile gap between the main towns of Potters Bar and Hatfield is not depicted. This is a glaring omission, particularly as the gap is already compromised by a large solar farm adjoining the north of Potters Bar (not shown), the RVC Major Development Site (which has recently had its Masterplan for further expansion approved) and allocated site HS22 (BrP4).

### 5) **Errors**

We note Figures 8.1 and 8.2 have erroneously omitted the following areas of absolute constraint:

- Ancient woodland and wildlife site (Brick Kiln Wood) within P65

- Potterells Wood Local Wildlife Site and Grassland North of Potterells Wood Local Wildlife Site within P65
- Water End Swallow Holes Site of Special Scientific Interest to the north of P65

Peter Miller

Water End Residents Group

17 September 2018