

# Welwyn Hatfield Green Belt Study – Stage 3 Addendum (12<sup>th</sup> June 2019)

## Purpose of Addendum

- 1.1 This addendum has been prepared in response to consultation on the consistency of the scorings and sub-division of parcels within the Welwyn Hatfield Stage 3 Green Belt assessment (2018).

*"The Inspector indicated at the round up session on the Green Belt Study that the methodology was robust, and he has confirmed that he is not intending to have any further hearing sessions to discuss the methodology.*

*In response to the consultation on the methodology which was held during September, a number of representations commented that they considered that the assessment of harm was not carried out on a consistent basis. The Inspector has therefore asked that there should be a round of consultation on the consistency of the scorings of the parcels and sub-division of parcels. The Inspector wants these matters to have been addressed before the village hearing sessions take place.*

*Those representors who have already covered these points in their original submission to the consultation on the Green Belt Review do not need to resubmit their representations. The points they raised on this issue will be considered by the Consultants together with the points that arise in the new round of consultation.*

*Following the deadline for comments, the Council's consultants will consider the points raised and will respond to the Inspector."*

- 1.2 The Addendum sets out LUC's responses to the comments raised. This includes a general response to the comments, followed by a summary of key changes made, followed by a parcel by parcel review of any comments raised in relation to specific parcels or sites.

## General Comments

- 1.3 There have been comments raised on a perceived lack of granularity in the assessment findings, focusing in particular on parcel definition and on ratings for contribution to Green Belt purpose.
- 1.4 The assessment parcels were not defined to represent potential releases of land for development, but reflect likely variations in contribution to Green Belt purposes. A large parcel therefore reflects an absence of significant variation in Green Belt contribution rather than a lower level of granularity. The process of identifying 'harm assessment scenarios' allowed variations in harm within a parcel to be identified, taking into consideration any variations in the impact on the role of adjacent Green Belt land. The nature of physical features identified as boundaries to the parcels did not therefore dictate the assessment ratings associated with the potential harm from release.
- 1.5 LUC do not agree that a smaller area closer to a settlement edge necessarily makes a weaker *contribution* to Green Belt purposes, as a result of having greater urban influence and/or playing a smaller role in a settlement gap. Clearly the presence of a settlement will typically be stronger in close proximity to the urban edge, but our view is that Green Belt assessment cannot be considered in such granular terms without straying beyond the intentions of the designation, as reflected in the NPPF's stated Green Belt purposes. The size of an area is not the key consideration when assessing the contribution of land, or harm resulting from release; if it were then the Green Belt would consist of a multitude of small areas each making a relatively small contribution to a greater whole. Splitting a parcel into two and suggesting that the part nearest the urban edge makes a weaker contribution is arbitrary, unless there is some distinction in terms of openness or containment by urbanising influences to reduce: the relationship with the

countryside; the extent to which the land forms part of a settlement gap; or the contribution to a historic town's setting/special qualities.

- 1.6 The definitions we have set out in our assessment criteria aim to minimise the extent to which parcel size and shape has an impact on findings. For example in the case of Purpose 2, the size of the gap between settlements is a key factor, along with the 'perception' of the gap (taking into account separating and connecting features). In the case of Purpose 3, land that is undeveloped and not significantly contained by urban influences is considered to be countryside.
- 1.7 Clearly the creation of a larger development will, all things being equal, have greater cumulative impact on openness than a smaller development, but when considering the *contribution* that land makes to Green Belt purposes; the size and form of any potential development cannot be taken into consideration and the focus must necessarily be on the openness of land and its relationship with urban areas and countryside. We would also note that we do not see any inherent implication in Green Belt policy that development more remote from urban areas should be considered to cause greater harm to Green Belt purposes than the continued expansion of larger urban areas. The stated fundamental aim of the policy is "to prevent urban sprawl by keeping land permanently open", so it could equally be argued that land adjacent to the urban edge is making the strongest contribution to this.
- 1.8 It is also important to be clear on the distinction between harm to Green Belt purposes and other forms of environmental harm. The relative size of a development and its proximity to existing houses may well have a greater impact on sustainability considerations such as traffic generation, service provision or landscape impact, but Green Belt harm assessment is concerned with impact on a spatial planning designation rather than on the physical environment.
- 1.9 The size of a potential release of land has more influence on the Stage 2 assessment of *harm*, when the impact on remaining Green Belt is a key consideration, as a larger release has more potential to weaken adjacent Green Belt. This does not however negate the value attached to Green Belt by virtue of its relationship with settlement and countryside – hence development of just a single house will typically be considered harmful to the purposes of Green Belt.

## Response to Consistency Queries

- 1.10 The table below summarises representor comments on the consistency of scorings and sub-division of parcels and sets out LUC's responses. Instances in which Green Belt harm scenario or contribution ratings have been altered, or the extent of parcels or scenarios has been altered, are as follows:
- Scenario P8a – area covered by this scenario reduced to encompass only Stage 2 site Wel3, and not Wel16;
  - New scenario P8c added, at the request of WHBC, to indicate harm from release of Stage 2 site Wel14 (omitted from the previous analysis), and also extended to incorporate Wel16 (see above);
  - Parcel P10 – Purpose 3 contribution rating changed from *partial* to *significant* (whilst noting that the housing estate at the centre of the parcel makes only a *weak* contribution);
  - Parcel P12 – Local Purpose rating changed from significant to partial (whilst noting that the motorway and adjacent tree cover play a more significant role);
  - Scenario P17a – harm rating changed from *moderate* to *moderate-high*, to correct error identified by LUC prior to November 2018 Green Belt examination session;
  - Parcel P23 – Purpose 3 contribution rating changed from *partial* to *limited*;
  - Boundary between parcels P26 and P27 amended to include the cricket ground and land to the south of it within P27, and P26 Purpose 2 rating changed from *significant* to *partial*;
  - P41 – an additional scenario has been added to reflect harm associated with proposed allocation SDS5;

- Scenarios P59 and P59a – harm ratings changed from *moderate-high* to *moderate*, to correct error identified by LUC prior to November 2018 Green Belt examination session;
- Parcel P61 – the playing fields of St Mary’s Primary School were erroneously excluded from the parcel – these have been added in, and included as part of scenarios P61a, P61b and P61c. The school and adjacent recreation ground have also been included in P61b;
- Scenario P78c has been deleted, so the area instead forms part of scenario P78b and has a *high* rather than *moderate-high* harm rating;
- A new parcel, P96, and accompanying release scenario have been added at the request of WHBC to encompass an area on the edge of Welwyn omitted from the previous analysis.

Table of responses

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reps Ref	Post-Exam Reps Ref	Consistency issue raised	LUC Response
P1	P1	Release of all, or part of parcel	High		King & Co, 897910	Failure to subdivide the parcel, and therefore identify variations in contribution to Green Belt purposes, is cited as an inconsistency.	This is a question of granularity rather than one of consistency – the representor does not cite cases where variations in parcel definition across the Borough have resulted in inconsistent results. See LUC’s general statement in comments preceding this table which addresses this issue.
						Failure to identify the railway line as a constraint is considered to have an impact on findings.	Again this is not a consistency issue, and is addressed in the general comments preceding this table. In the case of P1 the railway separates the parcel from the inset village of Woolmer Green, so it can be considered to serve as a boundary to the westwards expansion of that settlement. The presence of development at Oaklands and Mardley Heath to the south reduces its strength in marking a distinction between settlement and countryside, but regardless of this, it in no way weakens the role of the open land of parcel P1 in forming part of a gap between Oaklands and Mardley Heath and Knebworth. It is unclear why the representor considers that underplaying role of the railway line as a constraint to development has resulted in what is considered an overly high harm rating; if anything the railway’s role as a boundary would be seen to strengthen the relationship between the parcel and countryside to the north.
P3	P3	Release of the parcel as a whole	Very High		Knebwoth & Woolmer Green PC, 291594 & 723325	Subdividing some parcels is considered to distort the overall rating. The concern is principally that a gap which overall rates <i>very high</i> in terms of harm from release can have constituent parts which make a weaker contribution. Particular mention is made of the P3c scenario.	The fact that the gap as a whole is important does not mean that all areas contribute equally. As discussed in the general comments preceding this table, this is not a case of smaller areas by default making a weaker contribution, but rather of some locations having a different relationship with settlement and countryside.
	P3c	Release of Stage 2 site WGr1 and/or Local Plan allocations HS15	Moderate - High	Mr & Mrs Tubb Wallace, 894895		Considers the analysis to be deficient in its failure to take account of proposed woodland planting.	This is a methodological issue rather than one of consistency: details of proposed developments were not considered in the assessment. This was addressed in responses to the Inspector’s questions and issues (see document EX93 on the WHBC Examination Documents webpage – ref Q11).
						Criticises assessment for considering site WGr1 rather than the smaller HS15 allocation.	The difference between HS15 and WGr1 is considered to be negligible in terms of harm to Green Belt purposes. This is a large expanse of open arable farmland with no boundary features to mark either HS15 or WGr1, and we acknowledge that there would be “no significant extension of Woolmer Green’s settlement edge to the north” and that the new boundary would not weaken the Green Belt edge. In giving the <i>medium-high</i> harm rating, the assessment acknowledges the closer relationship between this area and Woolmer Green, in comparison to Parcel 3 as a whole (which rated <i>very high</i> for harm). However it is still undeveloped farmland adjacent to more countryside, so we do not consider that a reduction in contribution rating is warranted.
						Suggests that an incorrect assumption of visual openness between Knebwoth and Woolmer Green has resulted in an overly high harm rating.	The assessment did not suggest that the harm rating was influenced by perceived intervisibility between the settlements. The gap is fragile because of the limited physical distance between the two villages, and the land is open in the sense that there are no existing distinct landscape elements that could constitute a new boundary.
				Knebwoth & Woolmer Green PC, 291594 & 723325	Consider that the harm rating does not adequately reflect the openness of the site, and that it is not significantly contained by development.	We think that the explanation of harm for this scenario adequately explains the rating. The gap of two ratings levels between this area and P3 as a whole reflects local importance attached to maintaining the separation of Woolmer Green and Knebwoth, and the fact that loss of some openness on this edge of the gap would not diminish that separation as much as the release of land further to the north.	
P7	P7	Release of the parcel as a whole	Moderate - High	Bayard and Wattsdown Development, 544489, 1046397		Bayard and Wattsdown: Inconsistency in description of P7 as well contained, yet scoring it <i>significant</i> for contribution to Purpose 3. And in it containing development but still scoring <i>significant</i> when whole of P10 is <i>partial</i> despite having areas identified as having the characteristics of countryside.	See response under parcel P10 below.
				Welwyn Parish Council 785150		Consider that harm rating for the whole parcel should be <i>very high</i> , due to impact on the character and setting of Welwyn Village.	The character and setting of the village are landscape rather than Green Belt considerations (given the Welwyn Village is not a ‘historic town’ as defined in the assessment methodology).
	P7a	Release of all Stage 2 sites Wel1/Wel2/ Wel6/Wel15 in isolation or in combination	Moderate - High	Bayard and Wattsdown Development, 544489, 1046398	Failure to assess promoted sites on an individual basis, and the inclusion of unpromoted land, are identified as inconsistencies.	We see these as methodological comments. As clarified in LUC’s response to Q8 in the Council’s pre-examination hearing statement (EX93), Green Belt harm scenarios have been set out only as far as necessary to identify variations in harm.  The pre-exam representation sees failure to reflect size of release in harm rating as an issue, but this is likewise a question of methodology rather consistency, and is addressed in our general comments preceding this table.  As noted in LUC’s response to Q11 in the Council’s pre-examination hearing statement (EX93),	

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reprs Ref	Post-Exam Reprs Ref	Consistency issue raised	LUC Response
							specific development proposals make no difference to the assessment approach so there no necessity for their consideration as individual assessment units, or their distinction from unpromoted land. The assessment of unpromoted land was a requirement of the Inspector, and use of a consistent assessment methodology for land either within or outside of promoted sites was considered appropriate by LUC and WHBC.
						Rating both P7a and P41 as <i>moderate-high</i> harm is considered inconsistent, given that P41 makes a <i>significant</i> contribution to Purpose 2 and Purpose 3 whereas P7a makes a <i>significant</i> contribution to just Purpose 3, and a <i>partial</i> contribution to the Local Purpose.	The fact that the Local Purpose does not influence harm ratings (with the exception of the <i>very high</i> harm category) was addressed in LUC's response to Q26 in the Council's pre-examination hearing statement (EX93). It is not inconsistent with the assessment methodology for a parcel that contributes significantly to one Green Belt purpose to be attributed the same harm rating as a parcel that contributes significantly to two Green Belt purposes.
<b>P8</b>	P8	Release of the parcel as a whole	High	Gascoyne Cecil Estates, 906116  King & Co (submitted by ATP), 897910  Turnberry on behalf of Tabor Hamish landowner of Wel14, 1045336		Representations are concerned with size and definition of parcel, and lack of granularity.	These are addressed in the general comments preceding this table.
	P8a	Release of Stage 2 sites Wel3 (or Local Plan allocation HS20) and Wel16	Moderate - High		King & Co, 897910	King & Co representation does not identify any inconsistencies in the LUC report, but focuses on the presentation of more 'granular' development options which, as they would occupy a smaller part of the parcel, would in the representor's view result in less harm to Green Belt purposes if released.	The question of granularity is addressed in the comments preceding this table. It is clear that smaller development scenarios would typically result in less <i>environmental</i> harm than larger ones, but harm to Green Belt purposes is different to harm to land which is designated as Green Belt, and in LUC's view is not something which can be assessed on the basis of land area affected. The role of mitigation measures in potentially reducing harm is also put forward, but this too was addressed in LUC's response to Q11 in the Council's pre-examination hearing statement (EX93).  In reviewing assessment findings for this scenario we have decided that the distinction between the inset settlement and Wel16 is too great to assign a moderate-high harm rating, and that the rating should instead be <i>high</i> . Wel16 has therefore instead been included in scenario P8c, along with Wel14.
	P8c	Release of Stage 2 sites Wel14 or Wel16	High				This scenario has been added at the request of WHBC to indicate the harm associated with release of site Wel14, which was omitted from the previous analysis.
<b>P10</b>	P10	Release of the parcel as a whole	Moderate - High	Bayard and Wattsdown Development, 544489, 1046397		Inconsistency in P7 containing development but still scoring <i>significant</i> when whole of P10 is <i>partial</i> despite having areas identified as having the characteristics of countryside.	We feel that the existing commentary adequately supports the conclusions for P7. We likewise believe that the harm rating and supporting text for P10 are valid; however it is recognised that the <i>partial</i> rating for Purpose 3 contribution is somewhat misleading as it represents something of an average between the open outer areas of the parcel and the developed core. Given that the inner area is developed already, it would have been more appropriate to give a <i>significant</i> rating for Purpose 3, whilst noting that the housing estate makes only a <i>weak</i> contribution. This has therefore been amended.
					Cllr Nigel Quinton – 144441	Why only <i>partial</i> contribution to Local Purpose when P12 is <i>significant</i> ?	Only the motorway and adjacent tree cover are considered to play a <i>significant</i> role within P12. The rest of the parcel is identified in the purposes commentary as playing a <i>partial</i> role, so there is no inconsistency in ratings between P10, P11 and P12. It was not felt necessary to identify the motorway corridor as a separate parcel, with a separate rating, given its lack of development potential. For consistency we have amended the P12 rating to partial but noted the more significant role played by the motorway and adjacent tree cover.
<b>P11</b>	P11	Release of all or part of the parcel (including the southern part of site WGC6)	Moderate - High		Cllr Nigel Quinton – 144441	Why only <i>partial</i> contribution to Local Purpose when P12 is <i>significant</i> ?	See response under P10 above.
<b>P12</b>	P12	Release of the whole parcel	Very High		Cllr Nigel Quinton – 144441	Why significant contribution to Local Purpose when P10 and P11 are only <i>partial</i> ?	See response under P10 above. Local Purpose rating changed to partial but noting the more significant role played by the motorway and adjacent tree cover.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Repts Ref	Post-Exam Repts Ref	Consistency issue raised	LUC Response
P17	P17	Release of the parcel as a whole	High	Brooker Alex, 1023809		The representor presents a series of points which are cited as examples of inconsistency in application of the methodology. Many of these points do not in fact raise consistency issues but are critique of the P17 assessment or of the underlying methodology; however comments relating to failure to consider land/settlements beyond the Borough boundary do relate to consistency.	The fact that harm ratings have not been provided for land in East Herts does not mean that this area has been disregarded. Assessment of land beyond the Borough boundaries was not within the scope of the Green Belt study, but any relationship between land or settlements outside of the Borough and the assessment parcels within it that was considered to have a bearing on the analysis would have been noted. This includes consideration of the effect that release of land in Welwyn Hatfield would have on Green Belt land outside of the Borough. The absence of any comments in the P17 assessment relating to East Herts reflects our view that there are no considerations relating to land in East Herts that would change the assessment rating.
						Differences in the findings for P13 and P17 are cited as inconsistency.	We gave P13 a <i>very high</i> harm rating because of its more central role in settlement separation, located between Welwyn Garden City, Welwyn, Digswell and Oaklands. We stand by our judgement that land to the east of Digswell plays a less critical role in this respect.
	P17a	Release of site Dig1	Moderate	Aurora Properties (Deloitte) 322550 Brooker Alex, 1023809		Harm rating should be higher.	With regard to the P17a scenario, LUC identified its error in the rating for this area prior to the Green Belt examination session in November 2018. This error has been corrected, with the rating changed from <i>moderate</i> to <i>moderate-high</i> .
P18	P18	Release of all or part of the parcel	Moderate – High	Welwyn PC – 785150		Should be at least <i>high</i> harm due to impact on setting of Digswell Lake and perception from Bessemer Road.	The setting of Digswell Lake is not a consideration in the Green Belt assessment.
P20	P20b	Release of WGC8	Moderate	Welwyn PC – 785150		Land currently occupied by the Doberman Club should be rated <i>high</i> , as it provides a green break from Welwyn Garden City houses set back on the ridge.	The role of this area as a settlement gap is limited by the existing proximity of development in Digswell and Welwyn Garden City immediately to the west.
				Bedford, Neil 1031267		Inconsistency of ratings of sites P20 and P78, both of which are next to registered parklands.	In both cases the presence of parkland serves to strengthen potential boundaries, but other factors result in differences in the harm ratings.
P21	P21	Release of the parcel as a whole	Very High		Quinton Jane, 719857	The extent of variation between harm ratings for neighbouring parcels P21 and P22 has been queried.	The difference of two harm rating levels – <i>very high</i> for P21 and <i>moderate-high</i> for P22 – reflects the particularly significant contribution made by the slopes of the valley of the River Mimram to Purpose 3. There is a relatively sharp distinction between the flatter plateau, associated with the town, and the steeper valley sides. The interface between the two parcels does not necessarily represent a precise, sharp change in landform, but it is a well-hedged field boundary (not just a post and wire fence as suggested by the representor) that would form an obvious edge should any land be released from the Green Belt. The very high rating for P21 is applicable only to the steeper valley-side area of that parcel; hence the identification of a lower harm scenario, P21a, for the flatter south-western section.
P22	P22	Release of all or part of the parcel, including Stage 2 site WGC4(GB)	Moderate – High	Mariposa – 1029704		Mariposa representation queries variation in ratings for Purpose 2 between P22 and P20, P73-P76, for Purpose 3 between P22 and P73 and for Purpose 4 between P22 and P17.	<p>Purpose 2 – As noted in the P20 commentary, the fact that Welwyn Garden City and Digswell are already contiguous to the west of the parcel limits contribution to this purpose. There is also greater containment by tree cover than is the case for P22.</p> <p>The role of P73 in separation is limited by the fact that there is some development in the parcel already, but also by the proximity of Brookmans Park across the A1000. Further development to the east of the main road would not narrow the gap. The supporting explanation for this rating suggested that distance between towns negates any contribution, but this has been amended.</p> <p>For P74-P76 proximity of development to the west of the A1000 is again a significant factor in limiting contribution, and in the case of P74 the extent of development within the parcel adds to this.</p> <p>The gap between Welwyn Garden City and Hertford is a relatively small gap directly between towns, and therefore more fragile than the gap between Welwyn Garden City and Potters Bar. It is nonetheless recognised that the role of P22 is marginal and at the lower end of the <i>partial</i> contribution range, but it should also be noted that Purpose 3 is the key factor in the harm rating, and that consequently a lower contribution rating for Purpose 2 would not have reduced harm below <i>moderate-high</i>.</p> <p>Purpose 3 – The representation cites the previous airfield use of the site as giving it a greater association with the urban edge of Panshanger, and notes potential for landscape mitigation. It therefore suggests that a <i>partial</i> contribution rating would be more appropriate than <i>significant</i>. Our harm assessment recognises the stronger relationship between this plateau area and the sloping valley side to the north, but in terms of openness we do not consider built elements within the parcel to constitute any great urbanising influence. Former structures on the site have no bearing on the assessment, and neither do potential landscape enhancements.</p>

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reps Ref	Post-Exam Reps Ref	Consistency issue raised	LUC Response
							<p>With regard to P73 we stand by the <i>partial</i> rating given to the parcel but have noted that the supporting commentary requires further clarification to explain the judgement. It has therefore been amended. The partial rating reflects the presence of more urbanising built development than is the case in P22, and the fact that housing abuts it on two sides. It is noted that the harm rating, moderate-high, is the same for both P22 and P73.</p> <p>Purpose 4 – P22’s role in preserving the setting of Welwyn Garden City is perhaps marginal, but recognises the value attached to preserving openness in the context of the river valley. P17 is rated lower because it lies beyond this valley and adjacent to modern development at Digswell. The fact that it is adjacent to a Registered Park and Garden does not in itself mean that it should be considered to perform a stronger role with respect to Purpose 4, as the purpose relates to historic towns rather than any historical designation. As mentioned above, it should be noted that Purpose 3 is the key factor in the harm rating, and that consequently a lower contribution rating for Purpose 4 would not have reduced harm below <i>moderate-high</i>.</p>
					Quinton Jane, 719857	The extent of variation between harm ratings for neighbouring parcels P21 and P22 has been queried.	See P21 response above.
<b>P23</b>	P23	Release of all or part of the parcel	Low		Cllr Nigel Quinton – 144441	P23, P26 and P29 are only assessed as partial contribution to Purpose 3. Suggestion is that these make a weaker contribution than adjacent parcels because they are parks or sports grounds.	The supporting description for P23 has been revised. The fact that it has some urbanising elements and is contained on 3 sides by the urban area gives it a strong enough association with the town to limit its contribution to partial; however the analysis has not taken into consideration the containment of the parcel on its 4 <sup>th</sup> side by the EWEL1 housing allocation in East Herts District (which is treated as a ‘committed’ development). In this circumstance the parcel is entirely isolated from the rest of the Green Belt and so can be considered to make only a <i>limited</i> contribution to Purpose 3. This does not change the harm rating.
<b>P26</b>	P26	Release of the parcel as a whole	Moderate		Cllr Nigel Quinton – 144441	P23, P26 and P29 are only assessed as partial contribution to Purpose 3. Suggestion is that these make a weaker contribution than adjacent parcels because they are parks or sports grounds.	The larger part of P26 is a caravan park, which is inappropriate development in the Green Belt that is considered to have an urbanising influence. The rating is therefore considered appropriate. However we recognise that the cricket ground forming the western part of the parcel is open and, with tree cover to create reasonably strong separation from the urban area, should be considered as part of the adjacent P27. The Purpose 2 rating for P26 has also been amended from <i>significant</i> to <i>partial</i> to reflect the weaker contribution made by the caravan park in isolation.
<b>P29</b>	P29	Release of any part of the parcel	Very High		Cllr Nigel Quinton – 144441	<p>It is suggested that P29, along with P30 and P32, makes a significant contribution to the Local Purpose with respect to the gap between Lemsford and Welwyn Garden City.</p> <p>P23, P26 and P29 are only assessed as partial contribution to Purpose 3. Suggestion is that these make a weaker contribution than adjacent parcels because they are parks or sports grounds.</p>	<p>This is a question of methodology. As stated in the Assessment report at para 3.53, only gaps between inset settlements are considered to contribute to this purpose, so Lemsford as a washed-over settlement is not considered. It is accepted that were Lemsford to be inset the contribution of these parcels to the Local Purpose would increase, although contribution to the Local Purpose does not have a bearing on harm ratings (other than potentially in the identification of <i>very high</i> harm locations).</p> <p>There is a physical distinction between Stanborough Park, in its valley setting, and the wider countryside, and this containment combined with its functional use in our view warrant a <i>partial</i> contribution rating.</p>
<b>P30</b>	P30	Release of the whole parcel either in isolation or in association with the inseting of Stanborough (P39)	Moderate – High		Cllr Nigel Quinton – 144441	<p>It is suggested that P30, along with P29 and P32, makes a significant contribution to the Local Purpose with respect to the gap between Lemsford and Welwyn Garden City.</p> <p>Nigel Quinton suggests that development in P30 would effectively extend Welwyn Garden City across the A1(M), and that the comments relating to P32 should likewise apply to P30.</p>	<p>This is a question of methodology. As stated in the Assessment report at para 3.53, only gaps between inset settlements are considered to contribute to this purpose, so Lemsford as a washed-over settlement is not considered. It is accepted that were Lemsford to be inset the contribution of these parcels to the Local Purpose would increase, although contribution to the Local Purpose does not have a bearing on harm ratings (other than potentially in the identification of <i>very high</i> harm locations).</p> <p>The weakening of the Green belt edge is recognised, but harm is limited by the fact that development has already taken place within the area, along the A1000. The assessment for P30a notes the lower harm associated with release of just the developed area. P32 is very different in terms of its separation from existing development and its very visible location.</p>
					Cllr Nigel Quinton – 144441 Quinton Jane, 719857	It is suggested (by both Nigel and Jane Quinton) that proximity to the Lemsford Springs LWS should result in a higher contribution to Purpose 3, as protecting this area is an aspect of protecting countryside.	The contribution ratings relate to the land in question rather than adjacent land. The fact that Lemsford Springs is valued is already recognised in its treatment as an absolute constraint to development. The extent to which different types of constraint would benefit from different extents of buffer from built development is clearly an important consideration when looking at harm in the wider sense, but in terms of harm to Green Belt purposes alone, which is the limit of this assessment, it is not a consideration.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Repts Ref	Post-Exam Repts Ref	Consistency issue raised	LUC Response
P31	P31	Release of all or part of the parcel	Moderate – High		Cllr Nigel Quinton – 144441	The apparent treatment of golf courses (those in P31 and P66 are cited as examples) as making a higher contribution to preventing countryside encroachment (Purpose 3) than parks and sports grounds is queried. It is suggested that public accessibility is a factor which should weigh in favour of the latter.	Golf courses are not automatically rated more highly in terms of Purpose 3, but are considered on a case by case basis. As larger areas of open land they commonly have a weaker sense of association with, or containment by, an urban area than parks or recreation grounds. Public accessibility has no bearing on contribution to Green Belt purposes. The beneficial use of Green Belt land, which could although not necessarily relate to public access, is identified in the NPPF as desirable, but is not stated to be a purpose of Green Belt.
P32	P32	Release of all or part of the parcel	Very High		Cllr Nigel Quinton – 144441	It is suggested that P32, along with P29 and P30, makes a significant contribution to the Local Purpose with respect to the gap between Lemsford and Welwyn Garden City.	This is a question of methodology. As stated in the Assessment report at para 3.53, only gaps between inset settlements are considered to contribute to this purpose, so Lemsford as a washed-over settlement is not considered. It is accepted that were Lemsford to be inset the contribution of these parcels to the Local Purpose would increase, although contribution to the Local Purpose does not have a bearing on harm ratings (other than potentially in the identification of <i>very high</i> harm locations).
P33	P33	Release of the parcel alongside release of P34, the more developed part of Lemsford to the south of the main village road.	Moderate		Cllr Nigel Quinton – 144441 Quinton Jane, 719857	The methodology for assessing washed-over settlements is queried, but as the Green Belt study's methodology has been accepted by the Inspector as sound this response focuses on queries regarding the ratings given to Lemsford and Stanborough. The representation suggests that Lemsford is no less open than other villages which have been recommended for retention in the Green Belt, and that insufficient weight has been given to impact on the Green Belt boundary that would result from inseting Lemsford and Stanborough.	With the exception of Bullens Green and Burnham Green, which have strong associations with development in neighbouring districts, the settlements that have been recommended for retention without need for more detailed analysis (including parcelling of surrounding land) are all smaller and/or more dispersed in form than Lemsford. The LUC assessment considers that the contained nature of the main, northern part of the village would limit the harm to Green Belt purposes that would result from its release – i.e. limiting the extent to which Welwyn Garden City could be perceived as extending into the countryside. The A1(M) would remain the Green Belt boundary to the town, and constrained or high rated Green Belt land would maintain the village's distinct setting.
P34	P34	Inset existing settlement	Moderate – Low		Cllr Nigel Quinton – 144441 Quinton Jane, 719857	As per P33 query above. The <i>weak</i> contribution rating for Purpose 4 is also challenged.	See above response. With regard to Purpose 4, the representation cites listed buildings, the mill, two pubs, the church and the school as providing rural character, but most of these lie not within P34 but P33 and P36 (both rated <i>partial</i> rather than <i>weak</i> ). Impact of any development on the historic character of the village in its own right (rather than in terms of the setting or special character of Welwyn Garden City) should be a consideration of any decision-making regarding potential future development, but one which is separate to consideration of Green Belt purposes.
P35	P35	Release of whole parcel alongside release of existing washed-over village of Lemsford (P33 and P34)	High		Cllr Nigel Quinton – 144441	It is suggested that P35, along with P36 and P37, makes a significant contribution to the Local Purpose with respect to the gap between Lemsford and Stanborough.	This is a question of methodology. As stated in the Assessment report at para 3.53, only gaps between inset settlements are considered to contribute to this purpose, so Lemsford and Stanborough as washed-over settlements are not considered. It is accepted that were they to be inset the contribution of these parcels to the Local Purpose would increase, although contribution to the Local Purpose does not have a bearing on harm ratings (other than potentially in the identification of <i>very high</i> harm locations).
	P35a	Release of field on western side of parcel, alongside release of existing washed-over village of Lemsford (P33 and P34)	Moderate		Cllr Nigel Quinton – 144441	It is stated that P35a and P36 have almost identical characteristics yet are assessed very differently.	Impact on separation from Stanborough and consequent containment of the valley are identified as a consideration which would elevate harm in P36. Scenario P35a is more closely associated with that part of Lemsford which is least open, and has constrained Local Wildlife Site land to limit harm.
P36	P36	Release of all or part of parcel	High		Cllr Nigel Quinton – 144441	It is suggested that P36, along with P35 and P37, makes a significant contribution to the Local Purpose with respect to the gap between Lemsford and Stanborough.	See response to P35 above.
						It is stated that P35a and P36 have almost identical characteristics yet are assessed very differently.	See response to P35a above.
P37	P37	Release of all or part of the parcel, in combination with release of P39 (Stanborough)	High		Cllr Nigel Quinton – 144441	It is suggested that P37, along with P35 and P36, makes a significant contribution to the Local Purpose with respect to the gap between Lemsford and Stanborough.	See response to P35 above.
P38	P38	Release of all or part of the parcel, in combination with	Moderate		Quinton Jane, 719857	States concern regarding risk of coalescence of Welwyn Garden City and Hatfield should P38 and P39 be	This doesn't specifically raise a consistency issue, but the suggestion is that harm from release of these parcels is underrated. However P39 is fully developed, so whilst it is true that the on-paper Green Belt gap would be diminished by release of this land, the harm that would be caused by that



Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reprs Ref	Post-Exam Reprs Ref	Consistency issue raised	LUC Response
		release of P39 (Stanborough)				released.	is lessened by the fact that development already diminishes the physical gap. P38 is framed to the east, south and west by the P39 developed area, so its development would not narrow the existing gap between either Welwyn Garden City and Stanborough, or Stanborough and Hatfield.
					Dandara, 1041705	Concern about lack of differentiation between parcels in Purpose 3 ratings, and in particular with rating for P38.	Lack of differentiation is addressed in comments, preceding this table, relating to the granularity of the assessment. With regard to P38 we do not see any contradiction between the assessment commentary and the rating given for Purpose 3. This is entirely undeveloped open land, and the presence of hedges that visual screen wider views does not in itself diminish openness in a Green Belt sense. LUC's assessment does not, as stated by the representor, say that the parcel displays urban characteristics but rather that Stanborough does. The role of existing development and boundary features in minimising the impact of release of land on the adjacent Green Belt is addressed in the harm assessment, where the fact that P38 has been given a <i>moderate</i> rating – which in comparison to sites across the Borough is relatively low – reflects the level of containment.
<b>P39</b>	P39	Release of all, or part of parcel	Low		Quinton Jane, 719857	States concern regarding risk of coalescence of Welwyn Garden City and Hatfield should P38 and P39 be released.	This doesn't specifically raise a consistency issue, but the suggestion is that harm from release of these parcels is underrated. However P39 is fully developed, so whilst it is true that the on-paper Green Belt gap would be diminished by release of this land, the harm that would be caused by that is lessened by the fact that development already diminishes the physical gap.
<b>P41</b>	P41	Release of whole parcel (part of Stage 2 site Hat1/ Local Plan allocation SDS5)	Very High		Quinton Jane, 719857	Cumulative effects re P41-P47 are underestimated as a result of the way in which combinations of parcels have been assessed.	Re P41-P45: Cumulative scenarios were identified to encompass draft Local Plan site allocations as a whole (i.e. where they extend beyond a single assessment parcel) and to illustrate other combinations of release involving smaller parts of the parcel in question that would in our view result in a different level of harm. Thus in the case of P41 the P41, P41a and P41b scenarios make evident the relative importance of different parts of the parcel. P41c shows <i>very high</i> harm from release of the Stage 2 site Hat 1 as a whole. The P41d scenario has been included to suggest that harm would not be increased by release of the SDS6 allocation (P45) in combination with the partial release of Hat1. It is recognised that an additional <i>high</i> harm scenario could also have been created for the P41a area together with P45. Releases involving P42 and P43 are not listed as separate scenarios because inclusion of either would not increase the harm level associated with any of the above scenarios.  It was intended that the scenarios presented could help with assessment of other hypothetical scenarios involving adjacent unallocated land. E.g. Given that the release of P41 as a whole constitutes <i>very high</i> harm, any release greater than this in area would clearly also constitute 'very high' harm. To help clarify harm associated with release of proposed allocation SDS5, which equates to the Stage 2 site Hat1 but excluding land adjacent to Stanborough, we have created a new scenario P41e.
					Save Symondshyde 1029778	The strength of contribution for P41 to Purpose 2 is questioned. All but the north-east corner of the parcel should be considered to play a <i>partial</i> role, due to lack of perception of the Welwyn Garden City-Hatfield gap from Welwyn Garden City.	Although visual screening is a factor in settlement separation, distance is also a key consideration, so any reduction in the settlement gap will result in some Green Belt harm. However, the fact that there would be less harm associated with a partial release of the parcel <i>is</i> recognised in the identified harm scenarios: thus P41a has a <i>high</i> harm rating and P41b has a <i>moderate-high</i> rating, consistent with that of P45.
<b>P42</b>	P42	Release of whole parcel (most of which is part of Stage 2 site Hat1 / Local Plan allocation SDS5)	Moderate		Quinton Jane, 719857	Cumulative effects re P41-P47 are underestimated as a result of the way in which combinations of parcels have been assessed.	See P41 above.
<b>P43</b>	P43	Release of parcel as a whole (most of which forms part of Stage 2 site Hat1 / Local Plan allocation SDS5)	Moderate		Quinton Jane, 719857	Cumulative effects re P41-P47 are underestimated as a result of the way in which combinations of parcels have been assessed.	See P41 above.
					Aurora Properties (Deloitte) 322550	Suggests inconsistencies between P66 and P43.	See response under P66 below.
<b>P44</b>	P44	Release of the whole parcel	High	St Albans C&D Council, 1028715		Purpose 2 assessment is inconsistent in that it does not adequately consider cross-boundary gaps to Wheathampstead and Harpenden, or impact of new settlement on those gaps.	See comments under P45 below.

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					Quinton Jane, 719857	Cumulative effects re P41-P47 are underestimated as a result of the way in which combinations of parcels have been assessed.	The P44 scenarios demonstrate high harm from expansion of Hatfield that increases containment of the south-western edge of Welwyn Garden City (P44), or from development of Symondshyde without retention of a gap to Hatfield (P44d). Slightly less harm would result from development that results in less containment of Welwyn Garden City (P44a or P44c). The P44b scenario is intended to reflect our judgement that any expansion beyond Coopers Green Lane would weaken the Green Belt boundary, regardless of size.	
P45	P45	Release of all or part of the site / Stage 2 parcel Hat15 / Symondshyde Farm Site Allocation	Moderate - High	Bayard and Wattsdown Development, 544489, 1046397		Bayard and Wattsdown cite the <i>significant</i> rating for Purpose 3 as inconsistent with the conclusion that release of the site would not weaken the contribution of remaining Green Belt land to Purpose 3.	The fact that land has been assessed as making a significant contribution to a Green Belt purpose does not mean that its release should necessarily harm the contribution of remaining Green Belt land. The contribution assessment relates to the parcel that is being assessed, whilst the assessment of impact on adjacent Green Belt by definition applies to different land, the characteristics of which will affect its own contribution.	
						Quinton Jane, 719857	Cumulative effects re P41-P47 are underestimated as a result of the way in which combinations of parcels have been assessed.	The P45a scenario reflects that for P41a. Any other release in combination with P45 would result in higher harm.
						Save Symondshyde 1029778	Variations in degree of openness are not adequately reflected in the 3-level contribution rating system ( <i>significant / partial / weak or no</i> contribution). St Albans similarly note that there is greater variation in contribution to Purpose 3 than is reflected in the employed ratings system.	This is a methodological point rather than one of assessment consistency. We do not see any inherent implication in Green Belt policy that development more remote from urban areas should be considered to cause greater harm to Green Belt purposes than the continued expansion of larger urban areas. In our view it is non-Green Belt considerations such as landscape and visual, ecological and traffic impact that should, in combination with Green belt assessment, be weighed up to provide a more granular analysis of 'total' harm, rather than identifying more distinctions in level of openness.
							<i>Weak / no</i> contribution rating for contribution to the Local Purpose is inconsistent with conclusion in para 8.10 that "... the establishment of a new settlement may require an acceptance of some change to the local settlement pattern".	The assessment of <i>contribution</i> to Green Belt purposes relates to existing development rather than potential future development, so in the case of Symondshyde it is considering the relationship between parcel P45 and existing inset settlements. It is the assessment of <i>harm</i> resulting from release of Green Belt that considers the effect of development but, as clarified in the response to Q26 in the Council's Statement for the Stage 5 Hearing (EX93), it is only contribution to national Green Belt purposes that has informed the harm assessment*. The statement in para 8.10 was included to reflect recognition of the fact that the introduction of a new settlement would have some degree of impact on the local pattern, but as this relates to <i>harm</i> from release rather than <i>contribution</i> to purposes it is not considered to be inconsistent with the Local Purpose rating for P45.  *With the exception of the identification of 'most essential' Green Belt, where a 'significant' contribution to the Local Purpose was judged to boost a <i>partial</i> Purpose 2 contribution up to <i>significant</i> . This was not applicable to P45, which was assessed as making only a <i>weak</i> contribution to Purpose 2.
		St Albans C&D Council, 1028715		Purpose 2 assessment is inconsistent in that it does not adequately consider cross-boundary gaps to Wheathampstead and Harpenden, or impact of new settlement on those gaps.	The assessment did consider gaps between Harpenden and Welwyn Garden City / Hatfield, and did take account of intervening inset development at Wheathampstead. The judgement was that the distances involved, combined with the separating role of the extensive woodlands to the west and north of P45, meant that contribution to Purpose 2 was <i>weak</i> . This judgement is not considered inconsistent with the assessment methodology. It is recognised that Wheathampstead could have been mentioned in the context of gaps, but as Purpose 2 relates primarily to towns this was not deemed essential.  As discussed in the above response regarding the Local Purpose, the Purpose 2 contribution assessment only considered existing settlements. The harm assessment did consider impact of the new settlement but, although gaps between smaller settlements would be reduced, the overall gap between towns (which does take into consideration intervening inset development) would in our view not be sufficiently weakened to warrant a higher harm rating.  The fact that a central area between Wheathampstead and Welwyn Garden City has not been identified as 'most essential' Green Belt should not be taken to suggest that preservation of a gap between the two is not essential to avoid <i>very high</i> harm to Green Belt purposes, but rather that P45 and P44 are not individually considered to warrant that rating. It is only in cases where a smaller gap exists between settlements, or where a parcel or part of a parcel has distinctive characteristics that mark it out as a strong boundary, that 'most essential' Green Belt has been defined in relation to specific areas. Had a cumulative assessment been provided for release of P44 and P45 in combination, which would potentially result in losing all separation between Symondshyde and Hatfield, it would have been given a 'very high' harm rating, but this does not mean that all of that land needs to be kept open to avoid <i>very high</i> harm. It was not considered necessary to assess P44			

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							and P45 in combination as they do not form a proposed allocation. Similarly the loss of all separation between Wheathampstead and Symondshyde would constitute very high harm, but this assessment was not included because the land in question lies outside of Welwyn Hatfield Borough.
					Aurora Properties (Deloitte) 322550	Suggests inconsistencies between P66 and P45.	See response under P66 below.
				Quinton Jane, 719857		Suggests inconsistencies between P75 ( <i>high</i> ) and P45 ( <i>moderate-high</i> ) ratings, when written assessment is similar.	See response under P75 below.
				St Albans C&D Council, 1028715	Quinton Jane, 719857 Save Symondshyde 1029778 Aurora Properties (Deloitte) 322550	Jane Quinton, Save Symondshyde, St Albans and Aurora all consider that there has not been a consistent approach to identifying potential locations for a new settlement, with parcels only being identified in relation to Symondshyde.	It is correct to say that P45 and P44 were only included to facilitate analysis of the proposed Symondshyde allocation (SDS6), and P44 to bridge the gap to the nearest urban edges. Given that Symondshyde has been proposed as a site allocation it was considered appropriate to assess it with same level of detail as urban edge parcels. This does not negate the possibility that other new settlement sites, with a similar level of potential harm to Green Belt purposes, could potentially be found elsewhere, but no specific locations were proposed for assessment. It was not considered practical to assess all possible sites for a new settlement, of which a potentially large number could be identified, without also considering other non-Green Belt sustainability factors to narrow the scope.
<b>P46</b>	P46	Release of the parcel as a whole and P47	Very High		Quinton Jane, 719857	Cumulative effects re P41-P47 are underestimated as a result of the way in which combinations of parcels have been assessed.	Cumulative assessment scenarios are not identified for all combinations of parts of P46 and other parcels as it is not considered that combined harm would be higher than that of the highest-rated element. For example harm relating to release of P46b + P47 would not be higher than harm from release of P46 alone.
	P46b	Release of Stage 2 site Hat2	Moderate – High		Arlington – 897334	P46b should have same M rating as P43 and P47.	The key distinction between P46b and P47 is the greater urban influence relating to the latter, as a result of its usage and the presence of urban development on two sides – reflected in its <i>partial</i> contribution to Purpose 3. With regard to usage, sports pitches are an appropriate Green Belt use but the associated floodlighting is considered to add urbanising influence. P43 is also bordered on two sides by inset development. In itself this is insufficient to reduce the Purpose 3 contribution rating to <i>partial</i> , but when considering harm resulting from release the fact that Coopers Green Lane would form a distinct boundary, reducing impact on the wider Green Belt, justifies the <i>moderate</i> rating. Although P46b has some woodland containment it is nonetheless undeveloped open countryside that abuts existing development on only one side. With regard to settlement separation the representation states that P43b should have the same Purpose 2 rating as P47, but it should be noted that contribution ratings are only provided for each parcel as a whole. P46 extends further west than P47b, hence the <i>significant</i> rating for Purpose 2. The fact that release of P46b would have less impact on settlement separation is recognised in its lower harm rating and in the accompanying commentary.
<b>P47</b>	P47	Release of the parcel as a whole	Moderate		Quinton Jane, 719857	Cumulative effects re P41-P47 are underestimated as a result of the way in which combinations of parcels have been assessed.	Cumulative assessment scenarios are not identified for all combinations of parts of P46 and other parcels as it is not considered that combined harm would be higher than that of the highest-rated element. For example harm relating to release of P46b + P47 would not be higher than harm from release of P46 alone.
<b>P52</b>	P52	Release of parcel as a whole or in part, in association with inseting of Essendon (P51)	Moderate – High		King & Co, 897910	Suggests that variations in harm should be identified within P52, and identifies some inconsistencies across purpose and harm ratings.	The respondent suggests that the Inspector invited comments regarding granularity of analysis and consistency of scoring, however the invitation for further representation issues following the Green Belt hearing referred only to the latter. We have nonetheless responded in general terms regarding granularity, in the comments preceding this table.  Comments presented under the heading 'Inconsistencies' are disagreements with conclusions drawn, rather than examples of inconsistent application of the methodology. LUC's <i>significant</i> rating for contribution to Purpose 3 is challenged on the grounds that containing landscape elements would limit harm resulting from release, but this fails to recognise that contribution to Green Belt purposes and harm from release of land are assessed as two distinct things. The fact that land has strong containment by landscape elements does not diminish the extent to which it can be considered countryside; openness and containment are not contradictory. Development would therefore constitute encroachment, but the fact that harm to wider countryside resulting from release would be limited is recognised and reflected in the harm assessment – hence a rating of <i>moderate-high</i> rather than <i>high</i> . We disagree with the contention that lower harm would be associated with a scenario including release of dwellings to the west of the B158 together with extensive gardens, tennis courts and grassland beyond, and do not see this as a consistency issue.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reprs Ref	Post-Exam Reprs Ref	Consistency issue raised	LUC Response
P55	P55	Release of all, or part of parcel	High	FoE – 903594		Cumulative impact of P55,56 and 60 not assessed, and inconsistent treatment of gaps between Hatfield and Potters Bar.	Cumulative scenarios were identified to encompass draft Local Plan site allocations as a whole (i.e. where they extend beyond a single assessment parcel) and to illustrate other combinations of release involving smaller parts of the parcel in question that would in our view result in a different level of harm. In our judgement the cumulative harm to Green Belt purposes would not increase above the high rating given to P55 and P56; the gap between Hatfield and Welham Green is recognised as fragile but not in isolation critical to the prevention of merger of towns (i.e. Hatfield and Potters Bar), taking into consideration the existing proximity of the urban edges of Hatfield and Welham Green.  With regard to gaps between Hatfield and Potters Bar, the 'most essential' status accorded to Green Belt forming gaps to the south of Welham Green reflects a stronger contribution to the Local Purpose that is not judged applicable to the weaker gap between Hatfield and Welham Green.
					Cllr Nigel Quinton – 144441	It is suggested that P55 makes a significant contribution to the Local Purpose with respect to the gap between Hatfield and Welham Green.	The assessment identifies the fact that the settlements have already almost merged to the east, together with the separating role of constrained land (Local Wildlife Sites), as limiting contribution to this purpose. We stand by this judgement.
	P55a	Release of the park and ride area in isolation, or in combination with the cemetery and the P56a area to the east.	Moderate – High	Zukowskyj Paul 373497		Insufficient weight is given to the strength of the A1001 as a boundary feature.	Our analysis recognises that the Green Belt boundary would be weakened, but see existing uses to the south of the A1001 as limiting the extent to which the main road serves as a distinction between settlement and countryside.
P56	P56	Release of the parcel as a whole, or Stage 2 site Hat11	High	FoE – 903594		Cumulative impact of P55,56 and 60 not assessed, and inconsistent treatment of gaps between Hatfield and Potters Bar.	See response to P55 above.
					Cllr Nigel Quinton – 144441	It is suggested that P56 makes a significant contribution to the Local Purpose with respect to the gap between Hatfield and Welham Green.	The assessment identifies the fact that the settlements have already almost merged to the east as limiting contribution to this purpose. We stand by this judgement. It should be noted that separation between the settlements in terms of Purpose 2, also rated as <i>partial</i> , is a factor in the high harm level attributed to any release of land encroaching on the higher ground in the central and southern parts of the parcel.
					Dawson, Howard 897968	Howard Dawson: insufficient weight is given to the strength of the A1001 as a boundary feature. Harm from release of P56a should not be any less than that for P56 as a whole.	Although the A1001 is a clearly defined feature it doesn't represent as strong as boundary as would be the case of there were not existing development to the south of the road. This text has been amended to clarify this. The preservation of openness on higher ground between Hatfield and Welham Green is considered to be significant enough to justify the <i>moderate-high</i> harm rating for P56a.
					Zukowskyj Paul 373497	Insufficient weight is given to the strength of the A1001 as a boundary feature.	Our analysis recognises that the Green Belt boundary would be weakened, but see existing uses to the south of the A1001 as limiting the extent to which the main road serves as a distinction between settlement and countryside.
	P56a	Release of Local Plan allocation HS11, in isolation or in combination with the cemetery and the park and ride area to the west.	Moderate – High	Zukowskyj Paul 373497		Insufficient weight is given to the strength of the A1001 as a boundary feature.	Our analysis recognises that the Green Belt boundary would be weakened, but see existing uses to the south of the A1001 as limiting the extent to which the main road serves as a distinction between settlement and countryside. The supporting text has been amended to clarify this.
					Dawson, Howard 897968	Insufficient weight is given to the strength of the A1001 as a boundary feature. Harm from release of P56a should not be any less than that for P56 as a whole.	See comments above for P56.
	P56b	Release of the developed eastern section of the parcel	Moderate	Zukowskyj Paul 373497		Insufficient weight is given to the strength of the A1001 as a boundary feature.	Our analysis recognises that the Green Belt boundary would be weakened, but see existing uses to the south of the A1001 as limiting the extent to which the main road serves as a distinction between settlement and countryside.
Stewart, Ian 893870					Release of land would harm separation between Hatfield and Welham Green so harm rating should be higher.	The key point here is that development has already occurred, both here and on adjacent land, so release of the area would not have as much impact on the perception of separation between settlements as it would if the land was open and the gap was more robust.	
P57	P57	Release of all, or part of parcel (including Stage 2 sites GTLAA01, GTLAA02, GTLAA03,	Moderate – Low	Zukowskyj Paul 373497		Insufficient weight is given to the role of this parcel in settlement separation.	The representor places greater weight on the importance of separation between Welham Green and Hatfield than we consider to be justified with respect to the national Green belt purposes.
				North Mymms GB Society,		Insufficient weight is given to the strength of the east Coast railway line	The railway line is a strong boundary feature but the Registered Park and Garden at Hatfield also forms a strong edge, both as constrained land and as a visual barrier, beyond which development

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reps Ref	Post-Exam Reps Ref	Consistency issue raised	LUC Response
		WeG4a and WeG4b, and Local Plan allocations SDS7 and HS35)		1025107		as a Green Belt boundary.	would not occur.
					Aurora Properties (Deloitte) 322550  Dawson, Howard 897968	Suggests inconsistencies between P66 and P57.	See comments under P66 below.
<b>P59</b>	P59	Release of the parcel as a whole	Moderate – High	Terence O Rourke on behalf of Hill residents, Welham Green Promoters & Potterells Farm Partnership ) 891490, 1047643, 537908		The rating for P59 is considered inconsistent with the harm commentary.	With regard to the P59 scenario, LUC identified its error in the rating for this area prior to the Green Belt examination session in November 2018. This error has been corrected, with the harm rating changed from <i>moderate-high</i> to <i>moderate</i> . The harm commentary is unchanged.
				Landform Estates Ltd, Promoted by Barton Wilmore, 537908		The rating for P59 is considered inconsistent with the harm commentary. Assessments of purposes and harm are inconsistent with each other.	See above re rating for P59. The purposes and harm assessments are not necessarily consistent because they are not exactly the same thing. The harm assessment involves considerations, namely relating to boundary strength and impact on adjacent Green Belt, that can give different results depending on the specific area of land that would be released.
	P59a	Release of Stage 2 site WeG6	Moderate – High	Terence O Rourke on behalf of Hill residents, Welham Green Promoters & Potterells Farm Partnership ) 891490, 1047643, 537908		The rating for P59a is considered inconsistent with the harm commentary.	See comments above in relation to the same representation.
<b>P60</b>	P60	Release of the parcel as a whole (WeG12)	Moderate	FoE – 903594		Cumulative impact of P55, 56 and 60 not assessed, and inconsistent treatment of gaps between Hatfield and Potters Bar.	See response to P55 above.
				Terence O Rourke on behalf of Hill residents, Welham Green Promoters & Potterells Farm Partnership ) 891490, 1047643, 537908		Visual containment and urbanising influences should have resulted in a lower harm rating for this parcel.	The assessment rating reflects the limited harm to the wider Green Belt that would result from release of this site. The representor is placing greater weight on urbanising influence of the adjacent settlement edge than we consider to be appropriate: as open land this is countryside in its own right, and therefore plays a role in preventing encroachment regardless of the extent to which this would affect land beyond the parcel.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reps Ref	Post-Exam Reps Ref	Consistency issue raised	LUC Response
P61	P61	Release of the parcel as a whole	Moderate – High	Terence O Rourke on behalf of Hill residents, Welham Green Promoters & Potterells Farm Partnership ) 891490, 1047643, 537908.		Assessment text is considered inconsistent with harm rating – the latter should be lower.	The comment is that a site that is stated as being “relatively well contained”, in which “impact upon the integrity of the wider Green belt if released would be limited” should have a moderate rather than moderate-high harm rating. To do this would in our judgement be placing insufficient weight on the openness and rural character of the parcel. Our commentary also states that “The parcel is largely open and rural in character and its release would lead to encroachment of the countryside...”.
							WHBC received query regarding omission of St Mary’s Primary School’s playing field from the parcel. This has now been included, and added to release scenarios. It is also noted that scenario P61b (release of Stage 2 site WeG10) should have included the school site and the adjacent recreation ground.
P63	P63	Release of all, or part of parcel	High	Terence O Rourke on behalf of Hill residents, Welham Green Promoters & Potterells Farm Partnership ) 891490, 1047643, 537908		Insufficient weight is placed on the role of landform in limiting harm, and in containment by woodland belts limiting harm to the wider Green Belt.	This comment is placing insufficient weight on the openness and rural character of the parcel itself, the loss of which would constitute significant encroachment on the countryside. Although contained to the south and west the release of the site would affect the integrity of adjacent open land, notably P64. There is a north to south slope across most of the site but not any significant slope down towards Dixons Hill Road that would have an impact on the harm assessment.
	P63a	Release of the parcel in combination with the release of P64	High	Dawson, Howard 897968		P63a is the same as P64 but has a different harm rating.	There seems to be confusion between parcels, which are distinct areas of land, and scenarios, which can apply to all or part of a parcel, or a combination of land in different parcels. The scenario P63a is an assessment of harm resulting from the combined release of P64 and P63, as illustrated on the harm rating map that follows the scenarios for parcel P63. It does not equate to P64, and has a higher harm rating than P64, reflecting the higher harm that would result from extending the release of land further south. Scenario P64d shows the same scenario as P63a, and has a consistent rating.
P64	P64	Release of the parcel as a whole	Moderate – High	Terence O Rourke on behalf of Hill residents, Welham Green Promoters & Potterells Farm Partnership ) 891490, 1047643, 537908  Hill Residential 891490		Visual enclosure and scope, through ownership control of land to south, to provide strategic Green Infrastructure, have not been given sufficient weight.	The role of containment in limiting harm is recognised, but the representor’s comment is placing insufficient weight on the openness and rural character of the parcel itself, the loss of which would constitute significant encroachment on the countryside. Potential mitigation measures have not, as explained in the response to Q11 in the Council’s pre-examination hearing statement (EX93), been taken into consideration when assessing harm to Green Belt purposes.
				Dawson, Howard 897968		Parcel P63a is the same as P64 but has a different harm rating.	There seems to be confusion between parcels, which are distinct areas of land, and scenarios, which can apply to all or part of a parcel, or a combination of land in different parcels. The scenario P64 assesses a different area to P63a, the latter being an assessment of harm resulting from the combined release of P64 and P63. Scenario P64d shows the same scenario as P63a, and has a consistent rating.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Repts Ref	Post-Exam Repts Ref	Consistency issue raised	LUC Response
						Inconsistent conclusion between P64 and P65a with regard to impact of release on separation between Welham Green and Brookmans Park.	The <i>moderate-high</i> harm assessment for P64 does not comment on separation between Welham Green and Brookmans Park (neither of which are towns). The <i>high</i> harm P64d scenario, encompassing both P63 and P64 does note the loss of perceived separation between the towns of Hatfield and Potters Bar that would result from this larger release of land. P65a similarly indicates <i>high</i> harm and notes impact on settlement separation (although a lower level than would result from the <i>very high</i> harm scenario of release of the whole of P65). There is no inconsistency in these findings.
	P64c	Release of Stage 2 sites WeG1, WeG2, WeG3 and allotment area	Moderate	Terence O Rourke on behalf of Hill residents, Welham Green Promoters & Potterells Farm Partnership ) 891490, 1047643, 537908		Assessment text is considered inconsistent with harm rating – the latter should be lower.	Although acknowledging limited harm to the wider Green Belt the assessment notes that this would still be encroachment on countryside. The representor is placing greater weight on wider harm than on the contribution of the site itself. The representation also suggests that development within the urban area should be considered to diminish Green Belt harm, but our assessment places greater weight on the openness of the parcel, and the fact that it is not to a significant degree contained by urbanising development.
<b>P65</b>	P65	Release of the parcel as a whole, or the area to the north of Bradmore Lane (including Stage 2 site BrP5)	Very High	Dawson, Howard 897968		There is no reason to rate P65a lower in terms of harm than P65.	Reduced impact on settlement separation is considered to be sufficient reason to give P65a a lower harm rating.
				Water End Residents Group. 892073		Assessment of some Stage 2 sites in isolation but others as part of larger parcels is inconsistent. P65, P66, P72 and P78 are cited as examples.	It was clarified in LUC's response to Q10 in the Council's pre-examination hearing statement (EX93) that parcels and scenarios were broken down as far as was considered necessary to identify variations in contribution and harm. This is not considered to be an inconsistency. The question of granularity is also addressed in the comments preceding this table.
						Inclusion of railway line (and platform) with P65 but not within P78 is inconsistent.	The inclusion or exclusion of the railway line from particular parcels has no bearing on the assessment outcomes. Assessments note the role of the railway as a boundary feature regardless of which side of it the parcel boundary line is drawn.
						It is noted that figures 8.1 and 8.2 in the Green Belt Study do not show areas of absolute constraint in the vicinity of P65.	The constrained areas are shown but are being overlaid by green shading that is changing their colour from the grey indicated in the key. The shading of constraints has been amended for greater clarity.
		Denise Dixon, 897392	P65a should be considered essential Green Belt because of its role in preventing the merger of Brookmans Park and Potters Bar.	Release of this land would not in our view result in sufficient narrowing of the existing gap between Brookmans Park and Potters Bar/Little Heath to warrant a <i>very high</i> harm rating. Harm to Green belt purposes would still be <i>high</i> .			
	P65a	Release of Stage 2 site BrP4 or Local Plan allocation HS22	High	Dawson, Howard 897968		Inconsistent conclusion between P64 and P65a with regard to impact of release on separation between Welham Green and Brookmans Park.	See comments under P65 above.
						There is no reason to rate P65a lower in terms of harm than P65.	See comments under P65 above.
Royal Veterinary College, 898000				Inclusion of allocation HS22 in a larger parcel skews the assessment results. The harm scenarios break this down further but the assessments are brief and lack transparency.	This is a question of methodology rather than consistency. Parcels have been broken down as far as considered necessary to identify variations in contribution and scenarios are defined as far as is considered necessary to identify variations in harm. The issue of granularity is also addressed in the comments preceding this table.		
		Lower ratings are suggested for Purpose 2, Purpose 3 and the Local Purpose.	In our judgement the ratings given, and the supporting justifications, are correct. The representor's comment in our opinion over estimates the influence of adjacent development on this area's contribution to preventing countryside encroachment, and underestimates the extent to which existing development has left fragile gaps between settlements lying between Hatfield and Potters Bar.				
		Water End Residents Group. 892073		P65a should be rated <i>very high</i> rather than <i>high</i> because of its level of contribution to the Local Purpose.	P65 as a whole would result in <i>very high</i> harm if released, but release of P65a would not reduce the physical distance between Welham Green and Brookmans Park.		
<b>P66</b>	P66	Release of all of the parcel	Moderate – High		Cllr Nigel Quinton – 144441	The apparent treatment of golf courses (those in P31 and P66 are cited as examples) as making a higher contribution to preventing countryside encroachment (Purpose 3) than parks and sports grounds is queried. It is	Golf courses are not automatically rated more highly in terms of Purpose 3, but are considered on a case by case basis. As larger areas of open land they commonly have a weaker sense of association with, or containment by, an urban area than parks or recreation grounds. In the case of P66, the Purpose 3 description has been amended to clarify that containment by woodland doesn't weaken contribution to Green belt purposes.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Repts Ref	Post-Exam Repts Ref	Consistency issue raised	LUC Response
						suggested that public accessibility is a factor which should weigh in favour of the latter.	Public accessibility has no bearing on contribution to Green Belt purposes. The beneficial use of Green Belt land, which could (although not necessarily) relate to public access, is identified in the NPPF as desirable, but is not stated to be a purpose of Green Belt.
					Aurora Properties (Deloitte) 322550	Suggests that there is inconsistency in coverage between the Stage 3 Green Belt study and the preceding Green Belt studies.	The scope of work set out by WHBC when seeking to appoint a consultant to address the Inspector's concerns regarding the Stage 1 and Stage 2 studies did not request reassessment of sites analysed at Stage 2. However it was subsequently agreed between WHBC and LUC that to facilitate a consistent comparison between potential areas of release it would be preferable to examine all urban edges using the same methodology. LUC did not specifically assess promoted sites, but rather Green Belt land adjacent to inset settlement edges; therefore not all SHLAA sites were reappraised. The coverage of parcels encompassed all of the sites identified in the Stage 2 study and in the Stage 2 Addendum, and is not considered inconsistent with the requirements of the Inspector.
				Brooker Alex, 1023809	Aurora Properties (Deloitte) 322550	Aurora makes particular reference to the extent of containment of P66, and presence of urbanising influences, not being adequately recognised.  Alex Brooker suggests an over-rating of land adjacent to Brookmans Park in comparison to more open and uncontained land such as P17.	A golf course is an open, recreational use of land that is not inappropriate in the Green Belt, and woodland / tree cover is a more significant element in the relationship of this site with the wider countryside than built development. As noted above, the Purpose 3 description has been amended to clarify that containment by woodland doesn't weaken contribution to Green belt purposes. It is recognised that this parcel is less 'rural' than locations such as Symondshyde (P45), or the farmland to the east of Digswell (P17), but we see this as a consideration that should fall within the scope of landscape assessment rather than a review of harm to Green Belt purposes. The text supporting the <i>moderate-high</i> harm assessment implies greater urbanising influence than is reflected in the rating, but we consider the harm rating to be correct and have amended the wording to more accurately reflect it.
					Aurora Properties (Deloitte) 322550  Dawson, Howard 897968	Suggests inconsistencies between P66 and P43, P45 (Symondshyde), P57, P90.	The fact that P43 and P66 have the same contribution ratings, other than for the Local Purpose, but different harm rating is cited as evidence that LUC has given " <i>erroneous weight to the local purpose</i> ". This is not the case: the difference in harm rating reflects the stronger urbanising influence of development adjacent to P43. This was not considered strong enough to tip the Purpose 3 rating into the <i>partial</i> category on the 3-point contribution scale, but it was considered enough to reduce the harm rating, which used a finer 5-point scale. It is also clearly set out in our methodology that harm judgements take into consideration not only contribution to Green Belt purposes but impact on the integrity of adjacent Green Belt and on the form of Green belt boundaries; therefore consistent contribution ratings will not necessarily result in a consistent harm rating.  With regard to P57, it is contended that there should be no difference in contribution to Purpose 2 or Purpose 3. In our judgement the key distinction in terms of both Purpose 2 and Purpose 3 is the extent to which the parcel is affected by existing development: the large-scale development adjacent to P57 and the extent of development within it combine to reduce its contribution. The commentary has been amended to clarify this. The critique provided by Aurora's consultant places great weight on proximity of urban uses, but LUC considers that proximity alone does not constitute significant urbanising influence. This is a methodological issue (as discussed in the general comments preceding this table) rather than one of consistency. When considering the harm associated with release of P66 the assessment makes it clear that there is a degree of distinction between P66 and the wider countryside that limits the harm that would result from release of some or all of it.  With regard to P90, we do not see any inconsistency in our judgements relating to contribution to Purpose 3. As with P57 above, the representor is placing greater weight on the proximity of urban uses, but LUC considers that proximity alone does not constitute significant urbanising influence. Urbanising influences within P66 are limited to one corner of the parcel, but this has little impact on the openness of the rest of it. In terms of Green Belt purposes the school site and adjacent houses make a weaker contribution but, given the extent of existing development, their identification as a separate parcel was not considered necessary. In terms of Purpose 2 the gap between towns, taking into account also the presence of intervening inset villages, is wider in the case of P57. As a washed-over village Newgate Street plays less of a role in this respect.
					Dawson, Howard 897968	Howard Dawson suggests that the greater containment of P66 should have resulted in a lower harm rating than that given to P73.	See comments under P73 below.
				Water End Residents Group. 892073		Assessment of some Stage 2 sites in isolation but others as part of larger parcels is inconsistent. P65, P66, P72 and P78 are cited as examples.	See response under P65 above.



Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Repts Ref	Post-Exam Repts Ref	Consistency issue raised	LUC Response
	P66a	Release of Stage 2 site BrP12	Moderate – High		Aurora Properties (Deloitte) 322550	Suggests that some sub-parcels in the study, including P66a, have not been assessed against the Green belt purposes.  Suggests that the size of P66a in relation to P66 should be reflected in a lower harm rating.	It is clearly set out that LUC assessed contribution to Green belt purposes for each identified parcel. Sub-parcels are not defined in the LUC study; different harm 'scenarios' are presented but these do not constitute a separate contribution assessment. If P66a was considered to make a significantly different contribution to Green Belt purposes to the rest of P66 it would have been identified and assessed as a separate parcel.  The role of parcel size in the assessment of harm to Green belt purposes was addressed in paragraph 1.26 of WHBC and LUC's response to questions posed by the Local Plan Examination Inspector (document EX93), and is also referenced in the general comments preceding this table. It is recognised that the commentary accompanying the P66a rating suggested a lower level of harm but did not reflect this in the rating, so this has been amended.
<b>P72</b>	P72	Release of the parcel as a whole, in association with the inseting of P68	Moderate	Water End Residents Group. 892073		Assessment of some Stage 2 sites in isolation but others as part of larger parcels is inconsistent. P65, P66, P72 and P78 are cited as examples.	See response under P65 above.
<b>P73</b>	P73	Release of the parcel as a whole, or any part of the site (Transmitting Station or Stage 2 site BrP2)	Moderate – High		Dawson, Howard 897968	Suggests that the greater containment of P66 should have resulted in a lower harm rating than that given to P73.	It is noted that the commentary associated with the Purpose 3 rating for P73 is incorrect as it relates to separation of towns rather than encroachment on countryside; however the <i>partial</i> rating is considered appropriate due to the spread of urbanising influences within the parcel. The lower contribution rating does not, however, result in a lower harm rating because it is recognised that the Green Belt boundary would be weakened by release of this parcel. The Purpose 3 text has been corrected.
<b>P75</b>	P75	Release of all, or part of parcel	High	Quinton Jane, 719857		Suggests inconsistencies between P75 ( <i>high</i> ) and P45 ( <i>moderate-high</i> ) ratings, when written assessment is similar.	The key distinction is the role of the A1000 as a relatively strong boundary to the adjacent inset settlement of Brookmans Park. This elevates the harm rating for P75.
<b>P77</b>	P77	Release of the parcel as a whole	Low	Stewart, Ian 893870		Release of land would significantly narrow gap between Brookmans Park and Potters Bar so harm rating should be higher.	The key point here is that development has already occurred, so release of the land would not change the perception of separation between settlements.
<b>P78</b>	P78	Release of all parcel	Very High		Sibuns Scott 892350	All of P78 should be rated at <i>very high</i> harm; the identification of smaller areas with a lower harm rating, and with no separate contribution assessment, is inconsistent and lacks supporting explanation.	The identification of sub-areas of parcels with differing harm ratings is not inconsistent with the study methodology. The Green Belt Study report states as paragraph 3.95 that "Areas of 'most essential' Green Belt may also subdivide assessment parcels, to reflect the variations in harm identified at the development scenario level."
					Bedford, Neil 1031267	Inconsistency of ratings of sites P20 and P78, both of which are next to registered parklands.	In both cases the presence of parkland serves to strengthen potential boundaries, but other factors result in differences in the harm ratings.
					Bedford, Neil 1031267	Inclusion of Stage 2 sites BrP6, BrP9 and BrP10 in parcel P78 is unfair.	We do not see any reason to subdivide this parcel in terms of variations in contribution to Green Belt purposes. It is open, undeveloped land in the gap between Brookmans Park and Little heath / Potters Bar. The harm assessment stage takes into consideration potential subdivision of parcels where boundary features and variations in impact on integrity of adjacent Green Belt would result in variations in harm. The harm assessment has identified the area occupied by the three sites as having a lower ( <i>high</i> ) rating than the area to the south ( <i>very high</i> ).
					Royal Veterinary College, 898000	Failure to assess all harm scenarios against each Green belt purpose means that there is a lack of evidence to support the assessment rating.	Contribution to Green Belt purposes is not considered to vary significantly across a parcel; variations in harm relate to impact on the wider Green belt, and the nature of potential boundaries. Assessments for alternative harm scenarios provide only the information needed to explain the difference in harm between the area in question and the parcel as a whole. Therefore to gain a full picture the reader should look, in this case, at the contribution assessment for P78 together with the harm assessments for P78 and P78a. Together these explain the rating given.
					Water End Residents Group. 892073		Assessment of some Stage 2 sites in isolation but others as part of larger parcels is inconsistent. P65, P66, P72 and P78 are cited as examples.
	P78a	Release of Stage 2 sites BrP6, BrP9 and BrP10, in whole or part	High	Bedford, Neil 1031267		Assessment is lacking in detail, and is not objective, thorough or robust.	Assessments for alternative harm scenarios provide only the information needed to explain the difference in harm between the area in question and the parcel as a whole. The assessments for P78 and P78a together adequately explain the rating given.
				Water End Residents Group.		Do not agree with the assessment that release of Stage 2 sites BrP6, BrP9 and BrP10 would have the same <i>high</i> harm	Our comments preceding this table explain that the size of an area released from the Green Belt is not a direct factor in the assessment of harm to Green belt purposes.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Repts Ref	Post-Exam Repts Ref	Consistency issue raised	LUC Response
				892073		individually as they do in combination.	
					Royal Veterinary College, 898000	P78a should be identified as making a lower contribution to Purpose 3, due to the extent of urbanising influences. Rating is not consistent with methodology.	The parcel is open and undeveloped. The representor's comment in our opinion over estimates the influence of adjacent development on this area's contribution to preventing countryside encroachment.
						It is suggested that the rating for the Local Purpose of <i>significant</i> should be reduced to <i>partial</i> for BrP6, 9 and 10.	Parcels are not subdivided to reflect variations in contribution to the Local Purpose, only to the national Green Belt purposes. The lower harm assessment rating for this area than for that part of the parcel lying to the south reflects the fact that contribution to the Local Purpose is considered lower in P78a.
	P78b	Release of the eastern end of the parcel, including Stage 2 sites BrP7 and BrP7 (extension)	High		Royal Veterinary College, 898000	There is an error in the WHGBS assessment. Scenario P78c is described as release of site allocation HS25. This should read HS24.	This has been corrected.
						Scenario P78b is erroneously shown as larger than stage 2 site BrP7.	This is not an error. The harm scenario shows the area to which the rating given ( <i>high</i> harm) is considered applicable; it is not an assessment of BrP7 in isolation. If it was felt that BrP7 could be released with a lower level of harm it would have been identified as a separate scenario.
						Suggests that the proposed BrP7/BrP7 extension site makes only a weak contribution to the gap between Potters Bar and Hatfield	The representor suggests that the proposed BrP7/BrP7 extension site makes only a weak contribution to the gap between Potters Bar and Hatfield, but LUC's assessment of contribution relates to parcel P78 as a whole. The fact that Gobions Park provides a buffer between Brookmans Park and Little Heath is recognised and taken into consideration in the assessment of harm (hence only <i>high</i> rather than <i>very high</i> harm). It should also be noted that as LUC did not rate the parcel as making a strong contribution to this purpose, it is less significant in terms of the harm ratings given.
						P78b should be identified as making a lower contribution to Purpose 3, due to the extent of urbanising influences. Rating is not consistent with methodology.	The parcel is open and undeveloped. The representor's comment in our opinion over estimates the influence of adjacent development on this area's contribution to preventing countryside encroachment.
				Sibuns Scott 892350		The proposed boundary between P78b and P78 is exceptionally weak – any change in Green Belt boundaries should be sustainable and defensible.	It is recognised that there is not a strong potential Green Belt boundary here, hence the <i>high</i> harm rating. The reason harm is not <i>very high</i> is, as stated in the assessment, because the protected Gobions parkland forms a strong separating feature between Brookmans Park and Little Heath / Potters Bar.
	P78c	Release of site allocation HS25	Moderate – High		Dawson, Howard 897968	It is suggested that there is no sound reason for rating P78c lower than other parts of P78.	The HS25 allocation had no bearing on the decision to give P78c a lower harm rating. However on reflection we do consider that release of this area would weaken the Green Belt boundary and the integrity of adjacent Green Belt land, and that the rating for P78b would not therefore be reduced by a more limited release of land. Scenario P78c has therefore been deleted.
					Royal Veterinary College, 898000	Failure to assess all harm scenarios against each Green belt purpose means that there is a lack of evidence to support the assessment rating.	See response under P78 above.
						P78c should be identified as making a lower contribution to Purpose 3, due to the extent of urbanising influences. Rating is not consistent with methodology.	The parcel is open and undeveloped. The representor's comment in our opinion over estimates the influence of adjacent development on this area's contribution to preventing countryside encroachment.
<b>P79</b>	P79	Inset the existing settlement	Low	Stewart, Ian 893870		Release of land would result in loss of gap between Swanley Bar and Potters Bar so harm rating should be higher.	The key point here is that development has already occurred, so release of the land would not change the perception of separation between settlements.
<b>P80</b>	P80	Release of the parcel as a whole, in association with the inseting of Swanley Bar (P79)	High		King & Co, 897910	The representor presents outline development and landscaping proposals that it suggests would result in lower harm than indicated in the LUC assessment.	As explained in the assessment methodology, specific development proposals were not taken into consideration when assessing harm.
	P80a	Release of land between Little Heath and Swanley Bar (P79), in association with inseting of the latter	Moderate	Stewart, Ian 893870		Harm should be higher than moderate, due to role in retaining local settlement patterns (the gap between Brookmans Park and Potters Bar).	As set out in the contribution assessment text, the existing gap between Swanley Bar and Little Heath is considered to be too small to function as a strong separator. It therefore does not increase the harm rating above that assessed on the basis of the national Green Belt purposes.
					King & Co, 897910	Harm should be at least high, due to impact on separation between Swanley Bar and Little Heath.	Our assessment judged the gap between settlements to be too small to constitute highly significant separation in the context of towns (Potters Bar and Hatfield).
	P80b	Release of Stage 2 site Lhe1, including Local Plan allocation HS24	Moderate – Low	Stewart, Ian 893870		Harm should be higher, due to role in retaining local settlement patterns (the gap between Brookmans Park and Potters Bar).	As set out in the contribution assessment text, the existing gap between Swanley Bar and Little Heath is considered to be too small to function as a strong separator. It therefore does not increase the harm rating above that assessed on the basis of the national Green Belt purposes.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reps Ref	Post-Exam Reps Ref	Consistency issue raised	LUC Response
					King & Co, 897910	The representation suggests that the extent of containment by existing development warrants a <i>low</i> harm rating, rather than the <i>moderate-low</i> rating that was given.	Given that the land is open we feel that <i>moderate-low</i> is appropriate: only land that has significant urbanising development, or strong containment by inset areas was rated <i>low</i> in the assessment.
<b>P82</b>	P82	Release of the parcel as a whole	Moderate - High		Northaw and Cuffley Parish Council, Represented by Troy Planning & Design, 632756	Raises concern regarding the different parcelling used at different stages of the Green Belt assessment process.	The representor notes that the Stage1 assessment parcel GB52, which included Northaw but also a large area around it, contained only 0.7% of built development. This is not in our view a justification for including Northaw in the Green Belt: the assessment of the village in its own right, and consideration of its relationship with surrounding countryside through the definition of a Stage 3 parcel, is an approach that has been approved by the Inspector. The only reason P84 has been defined is to allow assessment of the area around Northaw in relation to washed-over settlement analysis; there is no distinction in terms of contribution to Green Belt purposes from surrounding land. It is clear from results that there is no potential to expand Northaw without <i>high</i> harm to Green Belt purposes, reflecting the distinctive settlement location.
<b>P86</b>	P86	Release of the parcel as a whole	High		Northaw and Cuffley Parish Council, Represented by Troy Planning & Design, 632756	The existence of P86 is questioned, as the built development within this area doesn't form part of Cuffley and doesn't constitute a washed-over settlement in its own right. Ribbon development of a similar form has not been assessed in the same way elsewhere in the Borough.	The parcel does abut the edge of the inset settlement of Cuffley. As with P77 to the south of Brookmans Park, it was considered appropriate to assess development contiguous with the inset settlement.
					King & Co, 897910	The partial contribution rating for Purpose 2 is contested.	LUC accepts that woodland areas subject to absolute constraints would prevent the complete physical merger of settlements but the proximity of settlements (e.g. Cuffley and Brookmans Park) is such that intervening land is still considered to make a partial contribution. If travel time between settlements is very short then there can still be a perception of limited separation.
	P86a	Release of area of existing residential development along The Ridgeway and Carbone Hill, including Stage 2 site Cuf2	Moderate - High		King & Co, 897910	Harm rating is challenged. The respondent has defined subdivisions within P86 to which contribution ratings have been assigned, and has suggested harm ratings for each of these areas, which represent varying degrees of expansion out from The Ridgeway.	Whilst existing built development clearly has an impact here, there is nonetheless a clear distinction between the form and character of this development and that of the inset village of Cuffley. The issue is the extent to which insetting P86a and any additional extensions would weaken the strength of the Green Belt by allowing development that would be distinct from existing urban areas: the Ridgeway is low-density linear development along a ridge and any expansion down from that ridge would represent countryside encroachment into a distinct valley landform. The Addendum's general comments in relation to the granularity of assessment are also relevant here - i.e. with regard to the principle that there is not a direct relationship between the size of an area assessed and the potential for harm to Green Belt purposes.
<b>P87</b>	P87	Release of the parcel as a whole, or in part (including Stage 2 parcels Cuf4, Cuf5, Cuf7, Cuf10 and Cuf12, and Local Plan allocations HS29 and HS30)	High		Northaw and Cuffley Parish Council, Represented by Troy Planning & Design, 632756	Harm rating should be <i>very high</i> , due to absence of defensible boundaries.	The absence of existing boundary features is not considered sufficient to warrant a <i>very high</i> harm rating.
					King & Co, 897910	Agrees with contribution ratings for the parcel as a whole but suggests <i>moderate-high</i> rather than <i>high</i> harm, due to containment by flood zone 3 and by a local wildlife reserve.	We place greater weight on the landform distinction between the existing settlement of Cuffley and land in the parcel.
					King & Co, 897910  Magenta Planning (Sustainable Development Solutions), 905280	Suggests that allocation HS30 should constitute a separate scenario, with lower harm, due to a closer relationship with the settlement edge, and openness compromised by existing built form. The Magenta representation also considers that the HS29 allocation should form part of a subdivided assessment area.	We do not consider the character of development here to constitute a significant urbanising influence. Land here is lower than the sloping ground to the north, but development would have an impact on the integrity of adjacent Green Belt land, increasing its containment.
					Magenta Planning (Sustainable Development Solutions), 905280	The rating for contribution to Purpose 2 is too high, given the distance between towns.	The role of intervening development in lessening perceived separation between towns needs to be considered, and the fact that the contribution rating relates to the nature of the gap as a whole rather than the size of parcels within that gap. It is recognised that release of land within parcel P87 would not have significant impact on this separation, so the assessment wording has been amended to reflect this, but the key factor that has resulted in the harm rating given is the relationship of the parcel with Cuffley, which increases harm in terms of countryside encroachment.
						The Local Purpose has been misapplied, and there is duplication with consideration of the national Green belt purposes.	We consider that the role of the Local Purpose was sufficiently addressed in responses to Q24-31 in the Council's pre-examination hearing statement (EX93). It has no bearing on the harm rating for P87.

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Reprs Ref	Post-Exam Reprs Ref	Consistency issue raised	LUC Response
						There is a lack of transparency in the harm assessment judgement for P87.	The assessment commentary notes "The parcel is open and rural in character and strongly distinct from Cuffley which slopes down eastwards from the parcel edge". As the assessment methodology states, the assessment of Green belt harm is not a cumulative one, in which ratings for contribution are added together, so significant harm to Purpose 3 combined with an extension to the Green Belt boundary that would weaken the current ridge-top edge is considered enough to warrant the <i>high</i> harm rating.
<b>P88</b>	P88	Release of the parcel as a whole	Moderate – High		Northaw and Cuffley Parish Council, Represented by Troy Planning & Design, 632756  Lands Improvement Holdings, 732747	The Northaw and Cuffley Parish Council representation states that the assessment of harm is unjustified because the parcel uses the Borough boundary, which is not a defensible feature. The Land Improvement Holdings representation also comments on this boundary.	The parcel boundary reflects the fact that the scope of the assessment was limited to the Borough. This in no way invalidates the assessment of harm: parcel edges are not defined as potential Green Belt boundaries but to reflect variations in contribution to Green Belt purposes within the Borough, and the harm assessment does not assume that the Borough boundary would also constitute a revised Green Belt boundary. However we do note that the harm assessment commentary could be improved to make reference to the well-defined stream corridor just to the east of the Borough boundary.
					Northaw and Cuffley Parish Council, Represented by Troy Planning & Design, 632756	Justification for identifying areas of lower harm within the parcel is contested. Comparison is drawn with Parcel P3, which has higher harm ratings.	There are stronger boundary features to contain releases in P88, and harm to settlement separation is less of a concern to the south of Cuffley than in the gap between Woolmer Green and Knebworth.
					Lands Improvement Holdings, 732747	The parcel straddles both sides of a railway line, which leads to a skewed assessment of contribution to Green Belt purposes.	We do not see any need to define separate parcels wherever a significant boundary feature occurs; only if the feature marks a distinction in contribution to Green Belt purposes. The methodology allows for subdivision of a parcel into separate harm scenarios, so if it was judged that the railway line would form a boundary that would result in a lower harm rating for the area contained by it, a scenario would be defined to reflect this.
						Alternative assessments are presented, with a subdivision into harm scenarios that suggest lower harm for Stage 2 sites Cuf3 and Cuf6.	This does not raise consistency issues. We stand by our assessment for these parcels.
<b>P89</b>	P89	Release of the parcel as a whole, including Stage 2 site Cuf1	Moderate – High		Northaw and Cuffley Parish Council, Represented by Troy Planning & Design, 632756	It is suggested that use of the Borough boundary as the parcel edge has resulted in a lower harm rating than would have been the case if the parcel had extended further east.	See response to P88 above. It is the relationship with existing development immediately to the south, which has 'breached' the railway line and therefore weakened its role as a settlement edge boundary, which limits the harm that would result from release of land in this parcel. Absence of an existing boundary feature does not preclude the release of land, as clearly defined edges can be created through construction and/or landscaping works.
	P89a	Release of Local Plan allocation HS27	Moderate		Cuffley Parish Council, Represented by Troy Planning & Design, 632756	The <i>moderate</i> level of harm is considered inconsistent when compared to similar sized parcels on the edge of settlements – e.g. P58 ( <i>moderate-high</i> harm) or P6 ( <i>high</i> harm).	Sub-area P89a has a lower harm rating than the other cited examples because of the presence of existing development to the east of the railway line. P89a does not extend further east than this adjacent development (along the Meadway) which means that, as stated in the assessment text, the gap to Goff's Oak would not be reduced.
					J I Thomas & Son (owner of Cuf1) represented by Bidwells, 324274	Considers that harm should be lower.	The representor in our view underestimates the harm that would result from encroachment on open countryside.
<b>P90</b>	P90	Release of the parcel as a whole	Moderate		Aurora Properties (Deloitte) 322550	Suggests inconsistencies between P66 and P90.	See comments under P66 above.
					Northaw and Cuffley Parish Council, Represented by Troy Planning & Design, 632756	Assessment of the parcel is questioned because containment of the parcel means that harm to the wider Green belt is limited.	The parcel has been assessed because it lies adjacent to an inset settlement edge. Containment from the wider Green Belt is no reason to exclude it from the assessment process – there is still harm associated with its release (as is recognised by the representation, which states agreement with the harm rating).

Parcel No	Harm Scenario Ref	Harm Scenario Name	Harm Rating	Pre-Exam Repts Ref	Post-Exam Repts Ref	Consistency issue raised	LUC Response
<b>P95</b>	P95	Release of the parcel as a whole, in association with the inseting of Newgate Street (P93)	High	Gascoyne Cecil Estates, 906116  King & Co (submitted by ATP), 897910		Criticises the definition of parcels, citing P8 and P95 as examples, which it says leads to a lack of granularity in the study.	Parcel definition and granularity have been addressed in the comments preceding this table.
<b>P96</b>	P96	Release of the parcel as a whole or in part, including Stage 2 parcel Wel11 and Local Plan allocation HS18	Moderate				Scenario added at the request of WHBC. It was omitted from the previous analysis.