

Examination of the Welwyn Hatfield Local Plan

Council's Statement - Stage 8 Hearing session

Northern Settlements

Settlement: Woolmer Green

Policy Number: SADM27

Site References: HS15 (WGr1)

Matter number: 4

Issues: Green Belt

Question Numbers: Q32-40



Policy SADM 27 Woolmer Green, Site HS15 (WGr1), Land east of London Road

This site is within the Green Belt and the National Policy Framework (NPPF) says at paragraph 136 that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of plans. As well as addressing the matters raised by representors and although not exclusively, the following questions are in part designed to establish what exceptional circumstances, beyond the Council's inability to identify sufficient land outside of the Green Belt in order to meet its Objectively Assessed Housing Need, exist to justify the release of these sites, in the context of the local and site circumstances.

Matter 4 – Green Belt

The National Planning Policy Framework stresses that the government attaches great importance to Green Belts and says that Green Belt boundaries should only be altered in exceptional circumstances.

The Council carried out a stage 3 Green Belt Review in 2018/19 in order to ascertain the contribution that a finer grain of sites, than were previously examined, around the urban fringes within the district, made to the different purposes of the Green Belt. In this assessment the overall harm at this site is considered to be Moderate/High but the parcel is not identified as an area of most essential Green Belt. In this context:

Question 32: Is the overall assessment of Moderate/High harm a sound interpretation of the contribution that this site makes to the purposes of the Green Belt?

Welwyn Hatfield Response:

- a) Yes, the Council considers that the overall assessment of Moderate/High harm is a sound interpretation of the contribution that this site makes to the purposes of the Green Belt.
- b) The Council's assessment of the development parcel that includes the proposed allocation **SADM 27 (HS15 – WGr1)** is set out in the Green Belt Study Stage 3 (March 2019 – **EX99C**). The entirety of the proposal falls within parcel P3, which is a larger parcel extending northwards towards Knebworth. The proposal site in question is more closely aligned to sub-parcel **P3c**.
- c) The 2019 study identified different 'scenarios' in order to consider variations in harm within a parcel and within proposed site allocations. Where sub-parcels were identified that would lead to differing levels of harm these are set out in the report, for example parcel P3 is sub-divided into four sub-parcels, a to d.
- d) It is important to consider the contrast in the assessment of harm between the whole of parcel P3, vs the sub-parcel that relates to the site in question, P3c. The Green Belt Study Stage 3 makes it clear that release of the whole parcel P3 would 'lead to coalescence of Woolmer Green and Knebworth', 'affect the perceived separation between the Tier 1 settlements of Stevenage to the north and Welwyn Garden City to the South' and 'the integrity of the Green Belt land beyond would be weakened by the parcels release' as the north-eastern boundary of the parcel is also the borough boundary.
- e) However, Parcel P3c is a much smaller area that is contained by inset development to the south and west and an absence of strong settlement edge landscape features. The Green Belt Study Stage 3 makes it clear that this area 'has a stronger association with the urban area and its release would not result in a significant extension of Woolmer Green's settlement edge to the north'. It is stated that 'a new boundary would not represent a weakening of the Green Belt edge'.

Question 33: In that context, is the allocation of this site justified, effective and consistent with national planning policy?

Welwyn Hatfield Response:

- a) Yes, the Council is confident the proposed allocation at Woolmer Green (SADM27 (HS15 – WGr1)) is justified, effective and consistent with national policy in accordance with NPPF (2012) paragraph 182. In particular:

***Justified** – the plan should be the most appropriate strategy, when considered against alternatives, based on proportionate evidence.*

- b) The plan has been informed by a comprehensive suite of evidence and a detailed and iterative plan making process that has considered reasonable alternatives through the Council’s Sustainability Appraisal process:

***Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities.*

- c) As referenced in the Council’s response to Question 41, the Council considers that the site is deliverable within the first ten years of the plan period following plan adoption, in accordance with a cautious but realistic timetable.

***Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

- d) The proposal will make a valuable contribution to the borough’s housing need at one of the sustainable villages (Tier 4 - small excluded village) in accordance with the Settlement Hierarchy (**Policy SP3 – Settlement Strategy and Green Belt Boundaries**), which form a secondary focus for a more limited amount of development where compatible with the scale and character of the village.

Question 34: Do exceptional circumstances exist to release this site from the Green Belt and if so, (other than Welwyn/Hatfield's housing need), what are they?

Welwyn Hatfield Response:

- a) Yes, the Council considers that exceptional circumstances exist to release the site from the Green Belt.¹
- b) This matter is addressed, in part, by the Council's Site Selection Background Paper (2016 – **HOU/20**), which considered exceptional circumstances on a site-by-site and borough wide basis.
- c) The Council's exceptional circumstance case, as set out in the Site Selection Background Paper, included consideration of the matters addressed by the Calverton Case:
 - 1. Acuteness of the OAN
 - 2. Constraints on supply and land availability
 - 3. The consequent difficulties in achieving sustainable development without imposing on the Green Belt
 - 4. The nature and extent of the harm to the Green Belt if boundaries are reviewed.
- d) The Council's updated Site Selection Background Paper (2019) updates and complements the Council's exceptional circumstances case and included consideration for the fifth matter addressed by Calverton:
 - 5. The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable extent.
- e) This matter has been considered on a site-by-site basis, as set out in the Site Templates (Appendix A of the Site Selection Background Paper 2019 – HOU/20a) that takes into account the nature and extent of harm to the Green Belt.
- f) Policy **SADM 27** makes it clear that a landscape buffer should be provided along the northern edge of the development to offset any landscape impact of development and help define the Green Belt boundary. This new boundary, common practice for new settlement edge development in the Green Belt, would form a robust and defensible boundary. The new boundary would align well with the existing settlement boundary, sitting below the ridge of the gently rising landform and located between

¹ The Council note that the plan is being examined under the 2012 Framework and that paragraph 83 of the 2012 Framework is relevant in this case rather than paragraph 136 from the 2019 Framework, as referred to in the Inspector's preamble. The Council note the distinctions between these two versions of the Framework.

existing inset development to the south and west and an existing absence of strong settlement edge landscape features. On this basis, and as stated in the Background Paper and Green Belt Study Stage 3, the new boundary would not represent a weakening of the Green Belt boundary. Furthermore, the approach would ensure that any impact was reduced to its lowest reasonable extent.

- g) The Council's Updated Site Selection Background Paper (2019) also provides a summary of the consequences of not imposing on the Green Belt in Welwyn Hatfield Borough that contribute to the exceptional circumstances case for the plan as a whole, and that apply equally on a site-by-site basis. Whilst the proposal at Woolmer Green is a smaller proposal to those at Welwyn Garden City or Hatfield, the contribution from smaller allocations is still an important part of meeting the borough's housing need. The consequences of not imposing on the Green Belt would mean the plan would fail to:
- “boost significantly the supply of housing for existing and future generations, for which an acute need exists,
 - Plan for or meet the full OAN or the identified requirement for employment provision,
 - Plan positively for economic growth, allowing for changes in the economy and businesses to remain, grow and locate in the borough,
 - Ensure there is a balance between housing and employment planned for in order to deliver sustainable development,
 - Adequately plan for and coordinate the delivery of infrastructure alongside growth (noting that smaller allocations still make a valuable and proportional contribution to local infrastructure and where smaller scale development contributes to the vitality and viability of local services and facilities),
 - Support a sustainable pattern of development, consistent with the Spatial Strategy and Settlement Hierarchy (as advocated by the NPPF at Paragraph 84) where the Council's proposed approach does:
 - Channel development first towards the urban areas, particularly at the main town of Welwyn Garden City and Hatfield, and
 - Towards towns and villages inset within the Green Belt, particularly the larger and most sustainable villages such as Welwyn and Welham Green”.

Question 35: Does the site infringe upon the existing gap in built development between Knebworth and Woolmer Green?

Welwyn Hatfield Response:

- a) No, the Council considers that the site in question does not infringe on the existing gap between Knebworth and Woolmer Green.
- b) As discussed in the Council's response to Question 32, the wider parcel (P3) does contribute to the existing separation and development of the entire parcel would lead to coalescence of Woolmer Green and Knebworth.
- c) However, the site in question is inset by development to the south and west and there is an absence of any strong settlement edge landscape features. The Green Belt Study Stage 3 makes it clear that the release of this parcel would not result in a significant extension of Woolmer Green. Importantly, the existing gap between Woolmer Green and Knebworth would not be any less as a result of development at the site in question. Furthermore, there is an opportunity to create a robust and defensible boundary that is not weaker than the existing boundaries and where any impact can be offset.

Question 36: Table 11 suggests the implementation of a landscape buffer along the northern boundary.

Welwyn Hatfield Response:

- a) Policy SADM 27 contains a policy requirement for a landscape buffer to be delivered along the northern boundary of the site, to offset the impact of the development on the wider landscape and help define the Green Belt boundary.

Question 37: In the context of the site boundaries on the proposals map, where is this buffer to be?

Welwyn Hatfield Response:

- a) As defined by Policy SADM 27 the buffer would extend along the northern boundary of the site as clearly shown on the policies map.

Question 38: How wide is this buffer expected to be?

Welwyn Hatfield Response:

- a) The precise width of the buffer is a matter of detail that will be considered at the planning application stage, but may typically extend to a few metres. The Council understands that establishing robust and defensible Green Belt boundaries at the edge of new development in the Green Belt, through the masterplanning of new planting, is common practice. Such a buffer would not unduly impact on the capacity of the site or its viability. The Council is content that Policy SADM 27 provides sufficient clarity in accordance with the NPPF (2012).
- b) The promoters' masterplan indicates a buffer of approximately 50m at its widest, narrowing at the sites access road.

Question 39: Once established, what impact would the landscape belt have on the openness of the Green Belt?

Welwyn Hatfield Response:

- a) The landscape belt would provide a robust and defensible Green Belt boundary in accordance with national policy. As discussed in the Council's response to Question 38, it is common practice for Green Belt boundaries at the edge of new development to be created through the master-planning of new planting, including within Welwyn Hatfield.
- b) Please refer to Question 40 for further discussion on the openness of the Green Belt.

Question 40: Is the proposed new boundary to urban development as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

Welwyn Hatfield Response:

- a) Yes, the Council considers that the proposed new Green Belt boundary to the site in question is as robust as the existing one.
- b) As discussed in the Council's responses to Questions 32 and 34, and as stated in the Site Selection Background Paper and Green Belt Study Stage 3 (2019 – **EX99C**) the proposal would not represent a weakening of the Green Belt edge.
- c) As discussed in the Council's response to Question 35, the site in question does not contribute to the separation between Woolmer Green and Knebworth and that the gap between these settlements will not be any less as a result of development than the existing gap.
- d) Any development would of course lead to some encroachment into the countryside, however, as discussed in the Council's response to Question 34, the Council

considers that exceptional circumstances have been demonstrated to justify the proposed allocation in accordance with national policy.