

For and on behalf of
Bayard Developments Ltd & Wattsdown Developments Ltd

**Response to Inspectors MIQ's Welwyn Hatfield Local Plan:
Session 36
Policy SADM 27, Site HS 15 (WGr1), Land east of London Road**

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CONTENTS	PAGE
1.0 Introduction.....	4
2.0 Policy SADM 27, Site HS 15 (WGr1), Land east of London Road	6
a) Matter 1 – Historic Heritage.....	6
b) Matter 2 – Environmental Considerations.....	8
c) Matter 3 – Infrastructure	8
d) Matter 5 – Sustainability	8
e) Matter 4 – Green Belt	8
f) Matter 5 – Implementation.....	11
APPENDIX 1 Combined Sustainability Appraisal Addendum Findings For Welwyn and Woolmer Green (Appendix 1 Sites Subject to Representations and Consultation Proposals)	12
APPENDIX 2 Comparison of parcel and Scenario Findings on Green Belt Harm	14

1.0 INTRODUCTION

- 1.1 These objections to this proposed allocation in the draft Local Plan may be summarised below:
- a. The proposed allocation is not justified by the available evidence base.
 - b. The selection of this allocation is not supported by the findings of the SA.
- 1.2 The approach that has led to the selection of allocations is not the result of a decision making process that is based on sound planning reasons as required by the Inspector and clearly set out in his various notes to the Examination. In summary, the Inspector has indicated that unless the Council adds in more sites to the Local Plan, it will be found unsound. He has also made it clear that decisions upon which sites to add into the Plan need to be based on sound planning grounds which are then applied consistently.
- 1.3 The process of site selection did not follow the above advice because the decision-making process undertaken to select the sites to be proposed for allocation as well as those not selected was fatally flawed as it was arbitrary, unjustified and inconsistent with the approach that is required by the SA and its treatment of reasonable alternatives.
- 1.4 The Inspector's most recent correspondence (EX186A) reiterates the importance of a consistent assessment of options stating that he is unable to reach conclusions on soundness of proposed allocations at Birchall Garden Suburb and the Symondshyde New Settlement, stating:
- "This is primarily because there is insufficient information about the availability of sites in sequentially preferable or more sustainable locations, and on **the comparative impact of developments** on the openness and purposes of the Green Belt. Additionally, I do not know fully **the relative consequent impacts of mitigation** on the purposes of the Green Belt, for either site or for other potential alternatives. Furthermore, I do not have sufficient information on the site and sustainability implications of releasing either site for development."* (our emphasis)
- 1.5 The reasons for site selection for sites within the 2016 submission draft Local Plan pre-date the more rigorous round of further testing and additional work undertaken by the Council. It is entirely irrational to consider that the justification to include sites in the 2016 draft Plan (and in some cases subsequently increase their capacity) addresses the objectives for a sound plan and consequences for sustainable development, while stating that selecting sites of the same status following additional work and to meet OAN does not.
- 1.6 In summary issues of relative sustainability or mitigation appear to have had little influence on the Council's reasons for site selection in the submission draft Local Plan. As such these decisions which include some sites and exclude others have not been based on a full assessment of the exceptional circumstances that are required to be demonstrated for Green Belt release.
- 1.7 In summary this detailed analysis of the Council's recorded approach to decision making is inherently illogical and unjustified when the comparison required by the inspector is undertaken. In particular:
- There remains no justification as to why sites of **'Moderate-High' harm to the Green Belt** are acceptable for allocation if they were identified in the submitted Local Plan (2016) but suitable and sustainable sites with the same impact have been summarily excluded from consideration to meet the OAN;
 - The potential impact of **'Coalescence between existing villages'** has been discussed extensively during the Examination. Further work to assess individual site options has, indicated the principles for Green Gap policy requirements and identified those

reasonable alternatives that would not have adverse impact upon these objectives but nevertheless have been excluded on these grounds.

- 1.8 The implication of the most recent evidence for site selection is that the submitted plan includes the following sites which are identified in the evidence base as having a “Moderate – High” impact on the Objectives of the Green Belt as well as well as having an impact on coalescence, which is either the same or greater impact than reasonable alternatives that would meet OAN in full.
- a. Sites of Moderate High impact included in the Submitted Plan, are:
 - i. SDS2 Land SE of Welwyn Garden City
 - ii. HS2 (Creswick) Welwyn Garden City
 - iii. SDS5 (HAT1) North West Hatfield
 - iv. HS20 (Wel3) School Lane, Welwyn
 - v. HS11 Land at South Way, Hatfield
 - vi. HS15 Land East of London Road, Woolmer Green
 - vii. HS21 Land West of Golf Club Road, Bell Bar
 - viii. HS22 Land west of Brookmans Park Railway Station
 - ix. SDS7 Marshmoor. Welham Green
- 1.9 A simple comparison between sites allocated in the Submitted Local Plan and those required to meet the full OAN also reveals that allocated sites have been assessed as having the same impact on the local function of the Green Belt as the sites required to meet the full OAN. This is illustrated by the comparisons in Appendix 2 (Tables 2) of this objection which show that:
- a. For Woolmer Green - Allocation HS15 has the same “Significant contribution” to the Local Purpose of maintaining the gap between villages as the site WGr3 which identified to meet the OAN (**Appendix 2** of these representations, Table 3).
- 1.10 What is even more incongruous is that the allocation HS15 is assessed in Green Belt terms as having Moderate-High Harm while the rejected site is WGr3 is assessed as only having Moderate harm. The justification for the allocation of sites of greater harm falls away in the context of not seeking to meet OAN.

2.0 POLICY SADM 27, SITE HS 15 (WGR1), LAND EAST OF LONDON ROAD

a) Matter 1 – Historic Heritage

i) To what extent has the proposal had regard to the available heritage evidence?

2.1 The site selection process does not undertake a proper assessment of the evidence or the extent of harm.

2.2 The SA assessment underlying the site selection process simply assesses the impact on Listed Buildings or Conservation Areas by the proximity of the site to these heritage assets. If any asset is within 250m then the effect of site, like this one, is assessed as being "Significant".

2.3 All assets have been weighted the same whether the asset be the actual setting of a Listed Building (as is the case here) or just proximity to the edge of a Conservation Area (as is the case for example of Wel15).

2.4 The SA Annex 1 for HS15 (WGR1) assessment on this issue (SA Objective 4.5 page 355) states

"This site is adjacent to Paynes Farmhouse Listed Building. Therefore, this site has the potential for a significant negative effect on the setting of those assets.

It is between 250m and 1km of four listed buildings, namely Milepost, 7 London Road, Church of St Michael and All Angels, and the Old Cottage. However, this proposed site is located to the north of Woolmer Green village and these heritage assets are located to the south and therefore likely to be screened from the impact of the proposed site. The site is also within 1km of Old Pound House in East Hertfordshire District, but this site will be separated from these by fields, farms building and residential properties on New Road and Hollybush Lane."

2.5 In this case the heritage asset is a listed farmhouse so the development of fields immediately adjacent to the west of this Listed Building are correctly identified as having a significant impact as these fields clearly provide a link between the original function of the building and the wider setting. However, with more distant heritage assets there is an assessment of the nature of the actual interrelationship of the site with those assets.

2.6 The issue with this assessment is that the same consistent approach has not been applied in the assessment of all potential sites.

2.7 For example the same level of significance is given to reasonable alternative sites which do not have the same impact, For example Wel15 is also identified as having a "significant impact" on the basis of the following summary (SA Annex 1 SA objective 4.5 page 407):

"This site is adjacent to Welwyn Conservation Area, which contains several Grade II Listed Buildings including Milepost, New Place and Garden Walls, Ivy Cottage, 11a, High Street, The Rose and Crown Public House and 24, Church Street. This site is also within 250m of Milepost Grade II Listed Building, north of Fulling Mill Lane. Therefore, this site has the potential for a significant negative effect on the setting of those assets."

2.8 The SA assessment of impact for Wel15 relies solely on distance with no actual assessment of impact. Unlike the details explored in the assessment for HS15 (WGR1) the assessment for Wel15 fails to refer to the large modern estate that separates the potential site from the listed assets of New Place or the large area of residential development between the site and Ivy Cottage, 11a, High Street, The Rose and Crown Public House and 24, Church Street. There is simply no prospect of the development of this site having an impact on these assets.

2.9 In respect of the two Mileposts referred to for Wel15 one located at Church Street is also separated for the site by residential development and is located to the back of the pavement

on the front elevation of a property whose rear elevation is some 280 metres from the site boundary and cannot be seen from site. The Milepost just north of Fulling Mill Lane (on Codicote Road) is also separated from the site boundary by the River Mimram and Singlers Marsh and is largely screened from views from the west by existing tree cover.

2.10 Even a cursory assessment of the relevant facts highlights that the potential impact of HS15 (WGR1) on the immediately adjoining Listed Building is different to that of Wel15 and yet both are classed as having the same level of impact on the heritage assets.

2.11 It must be concluded considering the above comparative analysis that the site selection process has had scant regard to the available heritage evidence. It tends to suggest that the SA has been retro-fitted to the decision on site selection by the Council with much less attention being given to the non-preferred sites.

ii) To what extent does the site impinge upon the setting of the Listed Building?

2.12 HS15 shares a boundary with the listed Paynes Farmhouse; as agricultural land surrounding the Listed Building it clearly forms part of the setting connecting as it does the original use of the farmhouse with the surrounding agricultural fields. This site rises gently away from the road as one exits Woolmer Green to the east and is clearly visible in the context of the setting of Paynes Farmhouse which is directly in front of the traveller when leaving the village in this direction.

2.13 Unlike other potential allocations which are alleged to impact on heritage assets this allocation has a clear potential to impact on this Listed Building.

iii) Table 11 says that a landscape buffer is to be established to the east of the site to protect the setting of the adjacent listed building.

2.14 It is difficult to see how this buffer can be delivered as the access needs to be achieved though what is presently the open gap between the settlement boundary and the curtilage of the Listed Building.

iv) In the context of the site boundaries on the proposals map, where is this buffer to be?

2.15 This is undefined

v) How wide is this buffer expected to be?

vi) In this context would the development be harmful to the setting of the heritage asset?

2.16 Unlike potential sites such as WE15 the development of this site will result in actual harm to the setting of the listed Payne's Farmhouse.

vii) If not, why not?

viii) Would any harm be substantial and if not, what weight should be given to it?

2.17 Without mitigation the development of the site could amount to substantial harm.

ix) Has the impact of development on the setting of the heritage asset been given adequate consideration?

2.18 It is unclear in the site selection process where the tests in paragraph 194 and 195 of the NPPF have been applied. Partly this is because of the light touch assessment of impact based on proximity rather than assessments of the actual setting of assets.

2.19 It is considered that the benefits of the development of this site and the potential mitigation could provide clear and convincing justification for the potential substantial harm to this grade II Listed Building to be mitigated but that the Council has not been able to provide this

evidence to date.

2.20 In accordance with paragraph 195 while the proposed development may lead to substantial harm to this designated heritage asset, this is considered necessary to achieve substantial public benefits of meeting the OAN that outweigh the potential harm.

2.21 If however the OAN is not to be met or there are other sites that do not result in such direct harm to heritage assets (such as Wgr3 or Wel15) that could be delivered in place of this site then the justification for the allocation of this site falls away.

b) Matter 2 – Environmental Considerations

2.22 No Comment

c) Matter 3 – Infrastructure

2.23 No Comment

d) Matter 5 – Sustainability

i) **27) Is Woolmer Green a sustainable location for development?**

ii) **28) Are there opportunities for significant residential development within the existing settlement limits, thereby using brownfield land?**

iii) **29) What is the balance between local employment provision and economically active residents?**

iv) **30) Is the amount of employment land and the number of businesses in Woolmer Green disproportionate to the amount of housing, existing and proposed?**

v) **31) Has this site been appropriately assessed in the sustainability appraisal?**

2.24 No – the sustainability appraisal is incorrect for the following reasons:

- o Impact on heritage assets as highlighted above has not been correctly assessed.
- o The landscape impact as assessed in the Landscape Appraisal 2019 only considers the impact of this site in terms of the contribution of a much larger area and has not undertaken an individual assessment of the release of this site for development. (NB the same criticism is true of the SA assessment of WGr3).

2.25 Even with these shortcomings in the SA, it should be noted that as demonstrated by the Council's own evidence (replicated in Table 1 at **Appendix 1** of this submission) this proposed allocation is less sustainable than the reasonable alternative of WGr3.

e) Matter 4 – Green Belt

vi) **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?**

2.26 In general, it is considered that the GB assessment has overestimated the impact of assessed sites on the Green Belt. However, in this case the rising nature of the site away from the settlement boundary coupled with the lack of definitive boundaries means that the site would have a greater impact on the Green Belt function than other sites that are not presently proposed for development.

2.27 The assessment of Green Belt harm remains flawed as demonstrated by the comparative tables in Appendix 2 of this Statement. The assessment of harm does not reflect the cumulative effect of a site's impact on different objectives of the Green Belt. For example, Tables 2 and 3 illustrate that Wel15 is assessed as having the same impact on the Green Belt as this allocation (HS15). While Wel15 and other Welwyn sites are only assessed as having a significant impact on Objective 3 of the Green Belt (Encroachment) they

nevertheless score the same as this proposed allocation HS15 which not only has a significant impact on Objective 3 (Encroachment) but also a partial impact on Purpose 2 (Preventing neighbouring towns from merging).

- 2.28 Presenting such sites as having a similar impact on the Green Belt purposes is misleading as it seriously underplays the other objectives of the Green Belt and over emphasises the single objective of the Green Belt in preventing encroachment (Objective 3). It is precisely for this reason that other Green Belt assessments remove objective 3 in order to provide a more nuanced appreciation of impact on Green Belt objectives.
- 2.29 In a situation where all reasonable alternatives have a significant impact on openness due to encroachment then a finer grained approach is required and impacts on other objectives such as preventing town from merging should also impact on the decision-making process.
- 2.30 This assessment does not allow for this finer-grained approach to be considered.
- 2.31 In this location the Council's relative assessment of this proposed allocation and reasonable alternatives is set out in Table 3 of Appendix 2 of this submission. This identifies that WGr3 would result in Moderate harm to the Green Belt while this proposed allocation is assessed as being Moderate/High harm - the plan and the supporting evidence still remains silent on why HS15 has been allocated in preference to the more sustainable WGr3 which has a lesser impact on the Green Belt objectives.

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

- 2.32 It cannot be concluded that the allocation is justified in the plan as submitted.
- 2.33 This is because there are sites which are equally or more sustainable and actually have a lesser impact on the Green Belt.
- 2.34 The plan and the supporting evidence remain silent on why this site (HS15), which causes a greater harm to the Green Belt, should be allocated rather than other reasonable alternatives. Without such clear justification the allocation is unjustified and unsound.
- 2.35 The available explanation for site selection is revealed by reference to the Site Selection Background Paper (paragraph 12.10) but this reflects a substantial reliance on establishing a new landscape buffer and utilising a natural ridgeline (which is not clearly evident on the ground) to ensure Green Belt boundaries are not weaker. This is clearly distinguished from paragraph 12.9 (recommending WGr3 for allocation) based on the site boundary leading to only Moderate harm.

viii) 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?

- 2.36 In order to meet the level of housing currently proposed in the plan there do not exist exceptional circumstances for the release of this site from the Green Belt. As demonstrated in Appendix 1 and 2 of this submission, according to the Council's own evidence base, there are reasonable alternatives to this allocation that would have a lesser impact on Green Belt functions and heritage assets but are as equally or more sustainable.

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

- 2.37 While WGr3 does not extend the built form any further southwards from Knebworth into this gap the proposed allocation does not extend development any further northwards and so to this extent both sites could be developed without the erosion of the present gap. However, as per comments at paragraph 2.14 above this impact is contingent on access to HS15, which is indicated as taken north into the current gap.

- 2.38 As explained in the response to consultation in the August 2019 Green Belt Assessment Addendum, LUC states:
- “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.”*
- 2.39 It is noted that the harm associated with release of WGr3 (rated Moderate) is on this basis assessed as lower than the Moderate-High harm associated with proposed allocation HS15 as contained in the submission draft Local Plan.
- 2.40 In relation to these findings it is noted that the August 2019 Green Gap Assessment identifies the location between Knebworth and Woolmer Green as sensitive. Map 2 indicates a potential Gap Policy Area that would include both WGr3 and the significantly larger and more open location associated with proposed allocation HS15.
- 2.41 These matters are addressed in the Council's Site Selection Background Paper, which identifies that for site WGr3 the amended Green Belt Boundary would remain clearly defined. The site is identified in Appendix 3 for a potential capacity of 25 dwellings, whereas the HELAA 2019 assess the promoted capacity at 40 dwellings. This reflects further moderation of the development area to retain woodland planting and reflects amendments after Council erroneously assumed the woods to the south were part of WGr3. The significant contribution towards preventing the countryside from encroachment for the parcel as a whole is distinguished in the Background Paper due to the site being enclosed by existing development on four sides.
- 2.42 Recommendations for the Gap Policy area indicate that development should not extend further south than the existing extent of Knebworth. The Map at Figure 5 of the published consultation proposals demonstrates that this would be achieved within the identified site boundaries for site WGr3'. The southern extent of the proposed allocation would be in-line with the existing designated boundary for the Green Belt east of the B197 located just beyond the southernmost existing property. This area east of the B197 is correspondingly excluded from the area recommended for a Gap Policy Area.
- 2.43 The Inspector's 28 October 2018 letter on the approach to the Stage 3 Green Belt Review, in relation to potential coalescence, states:
- “the protection of the settlement pattern is not a statutory purpose of the Green Belt and this analysis should be kept totally separate from any findings about the future of the Green Belt, even if for convenience you decide to retain Green Belt designation, for all such land, regardless of its actual contribution to the Green Belt itself.”* (our emphasis)
- 2.44 The Stage 3 Green Belt Assessment subsequently acknowledges that the local purpose of maintaining the settlement pattern has not been assessed in terms of potential harm to the Green Belt resulting from potential boundary amendments.
- 2.45 This demonstrates that it is fundamentally inappropriate to use potential issues of coalescence to reject potential site options in the wider context of work undertaken.
- 2.46 Maintenance of the settlement pattern is a broader aspiration of the Council, to be considered through the wider evidence base and scope to provide a sound spatial option to meet future needs. However, full consideration has been given to this factor in the Council's Site Selection Background Paper. This includes, when determining overall conclusions and the potential for exceptional circumstances to be demonstrated, utilising the Green Gap Assessment evidence base to inform planning decision making to help minimise impact and, where appropriate, to inform the need for mitigation measures.

2.47 In the case of WGr3, however, the overall conclusion notes that based on the proposed boundary amendment ***“at a settlement level there would be no noticeable extension of the Knebworth settlement edge southwards”***. As a result, no further requirements are identified in terms of satisfying relevant Green Gap policy objectives or preventing coalescence. In the case of HS15 the same can potentially be said in relation to not extending the settlement edge of Woolmer Green northwards, dependent on our comments regarding the location of access (see para 2.14 above).

x) 36) Table 11 suggests the implementation of a landscape buffer along the northern boundary. In the context of the site boundaries on the proposals map, where is this buffer to be?

2.48 This remains unclear and as such the SA has prejudged the potential of this proposal to mitigate the harm to the Green Belt and to the setting of the Listed Building.

xi) 38) How wide is this buffer expected to be?

2.49 No Comment

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

2.50 It would prevent views northwards from the rural road to the south which at present are not framed by development.

xiii) 40) Is the proposed new boundary to urban development as robust as the existing one, in the context

2.51 No – there is no northern boundary to the proposed allocation. The existing boundary is formed by the curtilage of existing building which while they are not necessarily attractive boundaries, they are readily identifiable and clear.

f) Matter 5 – Implementation

xiv) 41) When would the site realistically be likely to be able to deliver dwellings within the plan period?

2.52 No Comment.

APPENDIX 1 **COMBINED SUSTAINABILITY APPRAISAL ADDENDUM FINDINGS FOR
WELWYN AND WOOLMER GREEN (APPENDIX 1 SITES SUBJECT TO
REPRESENTATIONS AND CONSULTATION PROPOSALS)**

Table 1. Comparison of Sustainability Appraisal Findings for Sites at Welwyn and Woolmer Green

	1.1 & 1.2 Health		2.2 flood risk		4.2 greenhouse gas emissions from transport	4.3 air pollution		4.4 open space and landscape character, retaining local distinctiveness				4.5 Character, sense of place and local distinctiveness, historic environment	4.6 Protect and enhance biodiversity and geodiversity	4.8 water pollution	4.10 productive agricultural land and previously developed land	5.1 Housing			6.1 business and employment	6.2 economic investment and regeneration	6.3 Enhance the vitality and attraction of Welwyn Garden City and Hatfield town	6.4 Sustain rural communities and their economies	6.5 mineral resources	6.6 Learning and skills
			Proximity to employment and services/ housing	Proximity to transport	Proximity to employment and services	Proximity to transport	Open Space	Landscape character	Previously Developed Land	local distinctiveness					Amount of housing	Affordable housing	Dwellings for older people							
Welwyn																								
*Wel6	+	0	+	++	+	++	0	-?	0	-	--?	--?	-?	-	0	++	++	0	N/A	0	N/A	0	++?	
*Wel15	+	0	+	++	+	++	0	-?	0	-	--?	--?	-?	-	0	++	++	0	N/A	0	N/A	0	++?	
*Wel1	+	0	+	++	+	++	0	-?	0	-	--?	--?	-?	-	+	++	++	0	N/A	0	N/A	0	++?	
*Wel2	+	0	+	++	+	++	0	-?	0	-	--?	--?	-?	-	0	++	++	0	N/A	0	N/A	0	++?	
HS20/Wel3	+	0	+	++	+	++	0	-?	++?	-	-?	-?	-?	+	0	0	++	0	N/A	0	N/A	0	++?	
HS19/Wel4	+	0	+	++	+	++	0	-?	+	-	-?	-?	-?	+	0	++	++	0	N/A	0	N/A	0	++?	
HS18/Wel11	+	0	+	++	+	++	0	-?	0	-	0	--?	-?	-	0	++	++	0	N/A	0	N/A	0	++?	
Woolmer Green																								
WE100	+	0	++	++	++	++	0	?	++?	0	-?	-?	0	+	0	++	++	--	N/A	0	N/A	0	++?	
*WGr3	+	0	++	++	++	++	0	--?	0	--	0	0	0	-	0	++	++	0	N/A	0	N/A	0	++?	
HS15/WGr1	+	0	++	++	++	++	0	--?	0	-	--?	-?	0	-	0	++	++	0	N/A	0	N/A	0	++?	

**APPENDIX 2 COMPARISON OF PARCEL AND SCENARIO FINDINGS ON GREEN
BELT HARM**

Table 2. Comparison of Stage 3 Green Belt Assessment findings - Welwyn

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Location	Proposed 2016/2019	GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic towns	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
HS20	Wel3	School Lane	2016	P8	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Partial contribution	High	8a	Moderate High	9
HS19	Wel4	Sandyhurst	2016	P10	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate High	10a	Moderate Low	30
HS18	Wel11	The Vineyards	2016	P96	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate	96	Moderate	30
N/A	Wel4	Land at Kimpton Road	2019	P7	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate-High	7a	Moderate High	178
N/A	Wel2	Land adjoining Welwyn Cemetery	2019	P7	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate-High	7a	Moderate High	40
N/A	Wel6	Land at Kimpton Road	2019	P7	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate-High	7a	Moderate High	14
N/A	Wel15	Land at Fulling Mill Lane	2019	P7	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate-High	7a	Moderate High	14

Table 3. Comparison of Stage 3 Green Belt Assessment Findings – Woolmer Green

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Location	Proposed 2016/2019	GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic towns	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
HS15	WGr1	Land east of London Road	2016	P3	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Very High	P3c	Moderate High	150
N/A	WE100	51-53 London Road, Knebworth	2019									N/A	34
N/A	WGr3	Land at 52 London Road	2019	P3	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Very High	P3b	Moderate	25

Table 4. Comparison of Stage 3 Green Belt Assessment Findings – Potters Bar

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Location	Proposed 2016/2019	GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic towns	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
N/A	PB1	Enfield Chase Estate	2019 (Cabinet)	P83	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate High	P83	Moderate High	180

Table 5. Comparison of Stage 3 Green Belt Assessment Findings – Welwyn Garden City

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Location	Proposed 2016/2019	GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic features	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
SDS1	WGC4/7	Panshanger	2016	P22	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Limited or no contribution	Moderate High	P22	Moderate High	650
SDS2	WGC5	Land SE of WGC	2016	P24	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Limited or no contribution	Moderate High	P24c	Moderate High	1,300
HS2	WGC1	Creswick	2016	P27	Limited or no contribution	Significant contribution	Significant contribution	Significant contribution	Limited or no contribution	Very High	P27b	Moderate High	300
N/A	WGC4a	Land North East of Welwyn Garden City	2019	P22	Limited or no contribution	Partial contribution	Significant Contribution	Partial contribution	Limited or no contribution	Moderate High	P22	Moderate High	75

Table 6. Comparison of Stage 3 Green Belt Assessment Findings – Hatfield

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Location	Proposed 2016/2019 GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic towns	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
SDS5	Hat1/Hat13	North West Hatfield	2016 P41	Limited or no contribution	Significant contribution	Significant contribution	Limited or no contribution	Limited or no contribution	Very High	P41a	High	1,750
SDS5	Hat1/Hat13	North West Hatfield	2016 P43	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Limited or no contribution	Moderate	P41e	High	1,750
HS11	Hat11	Land at South Way	2016 P56	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	High	P56a	Moderate High	120

Table 7. Comparison of Stage 3 Green Belt Assessment Findings – Brookmans Park

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Location	Proposed 2016/2019	GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic towns	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
HS21	BrP13	Land west of Golf Club Road	2016	P66	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate High	P66b	Moderate High	14
HS22	BrP4	Land west of Brookmans Park Railway Station	2016	P65	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Very High	P65	High	300
HS23	BrP14	Land rear of 2-12 Great North Road	2016	P66	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate High	P66c	Moderate Low	10
N/A	BrP1	Upper Bell Lane Farm	2019	P72	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Limited or no contribution	Moderate	P72a	Moderate (GB Review says moderate- high)	104
N/A	BrP12a	Land north of Peplins Way	2019	P66	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate High	P66a	Moderate High	125
N/A	BrP34	Brookmans Park Transmitting Station	2019	P73	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Limited or no contribution	Moderate High	P73	Moderate High	300

Table 8. Comparison of Stage 3 Green Belt Assessment Findings – Little Heath

DLP 2016 (Site Ref)	HELAA 2019 (Site ref) Location	Proposed 2016/2019 GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic towns	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
HS24	BrP7 Land south of Hawkshead Road	2016 P78	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Very High	P78b	High	100
HS25	LHe1 Land north of Hawkshead Road	2016 P80	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	High	P80b	Moderate Low	35
N/A	LHe4/5 Videne, Hawkshead Road	2019 P80	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	High	P80a	Moderate	36

*LHe4/5 represents two HELAA sites but one allocation.

Table 9. Comparison of Stage 3 Green Belt Assessment Findings – Cuffley

DLP 2016 (Site Ref)	HELAA 2019 (Site ref)	Location	Proposed 2016/2019	GB Parcel Ref	Purpose 1 Check the unrestricted sprawl of large built-up areas	Purpose 2 Prevent neighbouring towns from merging	Purpose 3 Assist in safeguarding the countryside from encroachment	Purpose 4 Preserve the setting and special character of historic towns	Local Purpose Rating	Overall Parcel Release Harm	GB Scenario	GB Harm	Number of dwellings
HS27	Cuf1	Land at the Meadway	2016	P89	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Limited or no contribution	Moderate High	P89a	Moderate	30
HS28	Cuf6	Land south of Northaw Road East	2016	P88	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate High	P88c	Moderate	121
HS30	Cuf7	Wells Farm, Northaw Road East	2016	P87	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	High	P87	High	75
HS29	Cuf12	Land at Northaw Road East	2016	P87	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	High	P87	High	73
N/A	Cuf15	Land to south east of KGV playing fields	2019	P88	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Partial contribution	Moderate High	P88e	Moderate High	176

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