

TPA/2

**Welwyn Hatfield Borough Council
Local Plan**

Green Belt Topic Paper

May 2017



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Introduction

The purpose of this paper is to provide the background to the development of the strategy and policies set out in the Local Plan and to signpost how key pieces of evidence or issues raised during consultation have been taken into account.

This paper relates to the Green Belt and seeks to explain how and what evidence we have used to consider whether a limited alteration to the Green Belt boundary is justified and where we consider it is justified, the approach we have used to defining a new Green Belt boundary.

The Local Plan removes land from the Green Belt boundary around the following settlements:

- Welwyn Garden City
- Hatfield
- Woolmer Green
- Oakland and Mardley Heath
- Welwyn
- Welham Green
- Brookmans Park
- Little Heath
- Cuffley
- Rural Areas

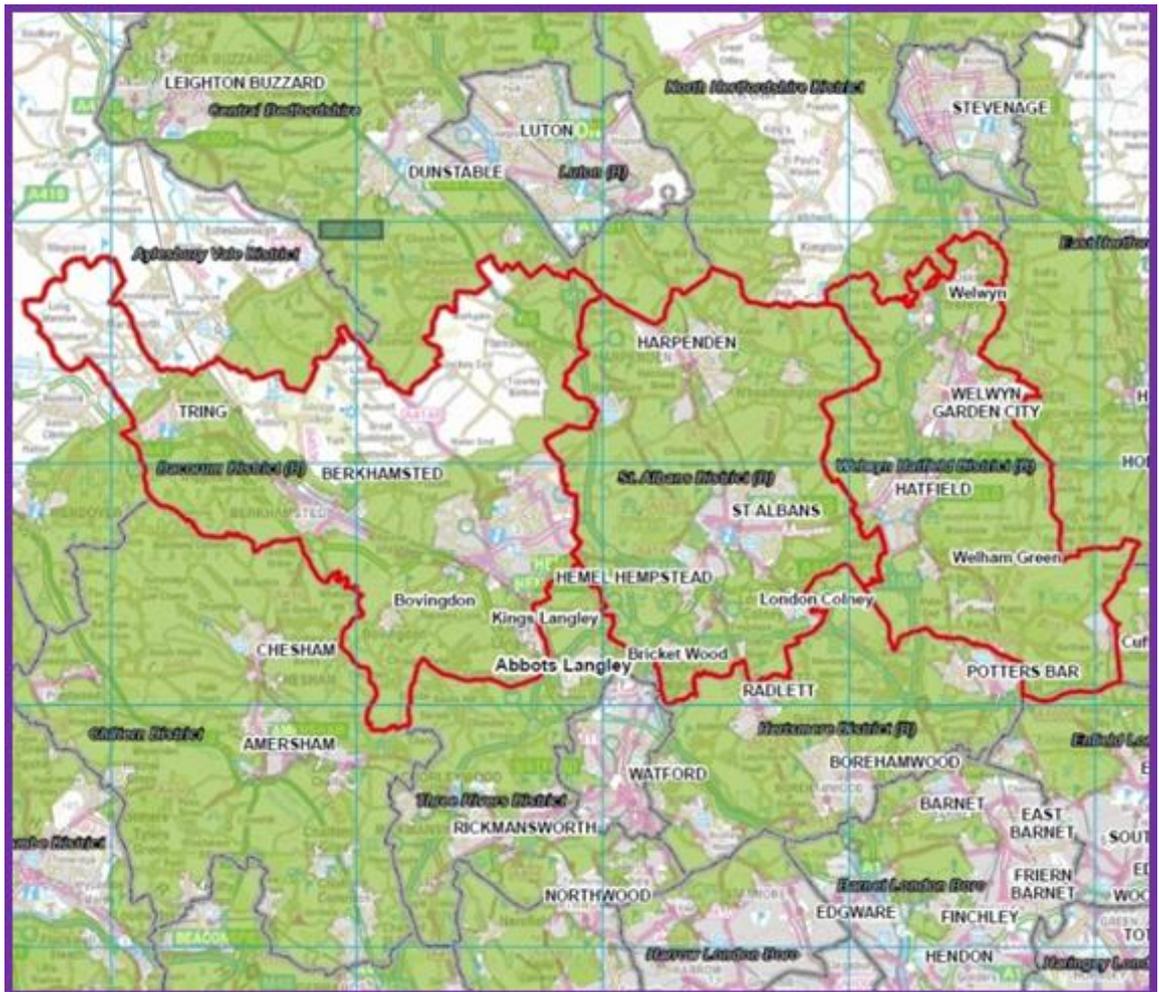
The paper relates closely to information contained within the Housing Topic Paper (TPA/4), the Economy Topic paper (TPA/3), and the Overview Topic Paper (TPA/1).

Background

- i) Welwyn Hatfield Borough is located centrally within Hertfordshire, covering an area of 130 km². Approximately 102.5km² (79.1%) of the borough is currently designated as Green Belt. The proportion of Green Belt land in the Borough will be reduced to approximately 97.7 km² if the sites proposed in the Local Plan are allocated through the Local Plan and developed. This means that 75.4 % of the Borough will still be within the Green Belt.
- ii) The southern part of the borough was included within the Metropolitan Green Belt in the Hertfordshire County Development Plan, which was approved in 1957. The Green Belt was extended to the northern part of the borough by approval of the first Hertfordshire County Structure Plan in 1979. This stated that all of the borough should be considered as being within the Metropolitan Green Belt apart from the towns and specified settlements. The inner boundaries of the Green Belt should be defined in local plans.
- iii) The 1982 Local Plan attempted to define the inner Green Belt boundaries for the first time. Although the plan was never formally adopted due to an outstanding objection, the policies and proposals were taken into account for the purposes of deciding planning applications (except to those relating to the Ellenbrook area).
- iv) The Welwyn Hatfield District Plan Adopted March 1993 reconsidered the boundaries generally and defined the inner Green Belt boundaries in the north of the borough.

The Green Belt boundary has remained largely unaltered since 1993 apart from one minor amendment to the north western boundary of Digswell, which was made in the 2005 District Plan. The 1993 Plan also defined Areas of Special Restraint between the urban area and the Green Belt to be safeguarded against future potential growth needs beyond 1996. Two areas of Special Restraint were defined, Hatfield Aerodrome and Panshanger Aerodrome. The land at Hatfield Aerodrome was brought forward for development in the Welwyn Hatfield District Plan Alterations which was adopted in 1998. The Area of Special Restraint at Panshanger is proposed to be brought forward for development in the submission Local Plan.

Figure 1: Wider Metropolitan Green Belt: Welwyn Hatfield and beyond



Source SKM, 2013

Section 1: Exceptional circumstances

- 1.1 The National Planning Policy Framework (NPPF) makes provision for changes to be made to the Green Belt. It requires Green Belt boundaries and policies to be established in Local Plans. However, it states that

“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”¹

- 1.2 There is no definition of what constitutes exceptional circumstances in the NPPF or in the accompanying guidance. However, in the recent housing white paper², the Government proposes to clarify national policy by permitting authorities to amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options. These include; use of brownfield regeneration, exploring potential of underused land, optimising densities and asking neighbouring authorities to help meet need. These proposals are still subject to consultation, but nevertheless, the Overview Topic Paper (TPA/1) sets out how Welwyn Hatfield Council has demonstrated that all options have been explored in the borough.

- 1.3 Recent planning case law has concluded that whether or not exceptional circumstances exist is a matter of planning judgement for decision makers. The issue of whether there is a need to release land from the Green Belt has been debated at every stage in the preparation of the Local Plan. The matter of whether exceptional circumstances did exist was considered by members of the Cabinet Housing and Planning Committee on 20th July 2016 agenda item 7³. In particular, reference was made in section 6 of the committee report to the case of **Calverton Parish Council Vs Nottingham City Council**⁴.

- 1.4 In essence this judgement concluded that exceptional circumstances related to the acuteness of the need and not just the inability to meet the need for housing or employment land. Furthermore consideration has to be given to the whole picture including the consequences for sustainable development.

- 1.5 Paragraph 4.11- 4.13 of the committee report concluded the following with regards to exceptional circumstances:

“4.11 The Objectively Assessed Need for housing falls within the range of 12,616 to 13,433 additional dwellings. The Economy Study indicates a need for land sufficient to support growth of around 16,900 jobs, with a predicted shortfall of around 5.4 hectares by 2032.

4.12 The Housing and Employment Land Availability Assessment (HELAA) has reviewed the suitability, availability and achievability of sites. This indicates that there is a significant shortfall of suitable land within the urban areas and through the use of safeguarded land to meet the need for both housing and employment development.

¹ Paragraph 83, National Planning Policy Framework, 2012

² Fixing our broken housing Market, 2017

³ Cabinet Housing and Planning Panel, 20.7.16, committee report:

<http://democracy.welhat.gov.uk/ieListDocuments.aspx?Cid=165&MId=316&Ver=4>

⁴ Calverton Parish Council v Greater Nottingham Councils & Ors [2015] EWHC 1078 (Admin) (21 April 2015)

<http://www.bailii.org/ew/cases/EWHC/Admin/2015/1078.html>

To set a target based on urban capacity alone would (for housing) result in the delivery of a quantum of housing at just under half the Objective Assessment of Need. This would fall significantly short of addressing the housing issues which the borough faces and would also fail to ensure there will be sufficient opportunities for new investment in the local economy (especially given the losses to employment land as a result of permitted development rights).

4.13 The Sites Selection Housing Background Paper was presented to this Panel on 13 June 2016. This considered the conclusions of the HELAA alongside the purposes of including land within the Green Belt, Green Belt boundaries, the Sustainability Appraisal, flood risk and any strategic advantages and disadvantages. The Panel at the same meeting of 13 June 2016 considered which sites should be included in the Local Plan and concluded that a target of 12,100 dwellings would be appropriate, based on the assessment of sites, the infrastructure constraints and the impact on the Green Belt. This would limit the nature and extent of harm to the Green Belt to the lowest reasonable extent whilst providing sufficient land for employment if account is taken of job creation between 2013 and 2014. It would still represent a shortfall in dwellings numbers against the full objectively assessed need with the shortfall representing between 500 and 1,300 dwellings approximately, equivalent to between one and two years supply. Notwithstanding this shortfall, the target of 12,100* dwellings would represent a significant uplift in the supply of housing, would address the social and economic needs of the borough and would represent sustainable development. Therefore it is considered that exceptional circumstances exist to amend the Green Belt boundaries and release land for development to meet the proposed targets for employment and housing.”*

**NB The housing target was reduced to 12,000 dwellings at that meeting.*

- 1.6 Furthermore, as an alternative to releasing Green Belt land in Welwyn Hatfield, the Council could have sought assistance from neighbouring authorities to help meet a proportion of identified housing need. Welwyn Hatfield has proactively engaged with local authorities within our Housing Market Area (HMA) and Functional Economic Market Area (FEMA) throughout the plan making process. As part of this cooperation it is identified that these neighbouring authorities are unable to help meet Welwyn Hatfield borough's need on land outside the Green Belt. Only two local authorities in the housing market area (East Herts and North Herts) have land beyond the Green Belt. In both cases, these authorities are proposing in their submission Local Plans to amend Green Belt boundaries to meet their own housing need. As a result, in Welwyn Hatfield options for development beyond the Green Belt are limited to the excluded towns and villages within Welwyn Hatfield, which as demonstrated above, would leave a significant shortfall against assessed need. Therefore, by definition, avoiding release of Green Belt land in Welwyn Hatfield would represent a less sustainable strategy.
- 1.7 The Council's case for exceptional circumstances therefore relates to the scale of the need for housing and employment land, which cannot be met within the urban areas, and the social and economic consequences of not addressing need as far as possible. Its inability to meet the full objective assessment of housing need relates in part to the consideration of the nature and extent of harm to the Green Belt and the extent to which it can be ameliorated or reduced.
- 1.8 The Housing (HOU/20) and Employment (ECO/8) Site Selection Background Papers⁵ set out the approach to assessing the supply of land to meet housing and

⁵ Housing Site Selection Background Paper, 2016: <http://welhat.gov.uk/housingsiteselection>
Employment Site Selection Background Paper, 2016: <http://www.welhat.gov.uk/employmentsiteselection>

employment land needs. Part of this assessment included the consideration of the nature of the harm of releasing land from the Green Belt to its purposes. The following section explains the Council's assessment process.

Section 2: Assessment of impact on the Green Belt

- 2.1 Part of the consideration of exceptional circumstances is the nature and extent of the harm to the Green Belt and the extent to which the consequential impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.
- 2.2 The five national purposes of the Green Belt in the NPPF are to:
- Check unrestricted urban sprawl of large built up areas;
 - Prevent neighbouring towns from merging into each other;
 - Assist in safeguarding the countryside from encroachment;
 - Preserve the setting and special character of historic towns; and
 - Assist urban regeneration by encouraging recycling of urban land.
- 2.3 The Council has undertaken the following studies to inform the assessment of harm to the Green Belt purposes.

The Green Belt Review Purposes Assessment (2013) (Stage 1 Strategic Review)

- 2.4 The Green Belt Review Purposes Assessment⁶ (GB/1, GB/1a, GB/1b, and GB/1c) was jointly commissioned by Welwyn Hatfield Borough Council, St Albans City & District Council and Dacorum Borough Council. It provides a strategic assessment of how all land in the Green Belt across the three boroughs contributes to the national purposes.
- 2.5 Land was sub-divided into a series of 66 strategic parcels (Figure 6.1 page 36) and then its contribution to each of the national purposes was assessed as either being 'significant', 'partial' or 'limited or no contribution'. The fifth Green Belt purpose (regeneration) was excluded from the assessment as it was already apparent at the time the Green Belt Review was carried out that there was a limited supply of available or unallocated brownfield land across the three local authority areas and that hitherto, the Green Belt had successfully fulfilled its purpose in assisting regeneration. The assessment also made a high level assessment of how Green Belt land contributes to retaining openness and the character of the countryside.
- 2.6 In addition, the assessment identified a local purpose to broadly maintain the existing settlement pattern in this part of Hertfordshire by providing a range of spaces and gaps between villages and towns and between villages, preventing them from merging into one another.
- 2.7 As part of the assessment, strategic gaps (town to town), primary (local town to village) and secondary local gaps (village to village) were identified and these are illustrated on Figure 7.7 and Figure 7.7.3 of the study (pages 55 and 57).
- 2.8 In conclusion the assessment identifies land contributing least to the Green Belt purposes. In Welwyn Hatfield the following Strategic and Small Strategic sub areas are recommended for further consideration.

⁶ Green Belt Review, SKM, 2013: <http://www.welhat.gov.uk/article/5488/Green-Belt-Review>

Strategic sub-areas

- a) Land at Hatfield Garden Village(WH-S1) enclosed by north Hatfield, Coopers Green Lane (to the west) and A1(M); and
- b) Land southeast of Welwyn Garden City enclosed by the A414 (WHS2).

Small scale sub-areas

- a) Land south of Welwyn Garden City(GB44) to the south of Golden Dell, enclosed by Ascots Lane to the south and settlement edge to the east; and
- b) Land west of Hatfield (GB35) to south of Wilkins Green Lane urban edge and west of Ellenbrook Lane.

2.9 The study also concluded that on the basis of the assessment undertaken that some reduction in the size of individual parcels in which sub-areas have been identified would not significantly compromise the primary function of the Green Belt or compromise the separation of existing settlements. It was also stated that, given the non-strategic nature of the small-scale sub-areas identified those identified may not be exhaustive. It was therefore possible that additional potential small-scale boundary changes, that would not compromise the overall function of the Green Belt, might be identified through more detailed assessment work.

Welwyn Hatfield Green Belt Review Stage 2 (2014 – 2016)⁷.

- 2.10 The second stage of the Green Belt Review (GB/2, GB/2a, GB/2b, GB/2c, GB/3, and GB/3a) took forward the recommendations of the strategic sites purposes assessment to consider in more detail the strategic sub-areas, the small scale sub areas and whether there were any other small sites which could be considered for release. The methodology⁸ (GB/2a) was designed to ensure consistency with the Stage 1 Strategic Review (GB/1).
- 2.11 In addition to sites recommended for further assessment, sites identified in the Strategic Housing Land Availability Assessment (HOU/11), and the Gypsy and Traveller Land Availability Assessment (HOU/13) were included in the Stage 2 Review.⁹ (GB/2, GB/2a GB/2b, GB/2c) New sites promoted during the 2015 Local Plan consultation (SUB/1a) and included as part of the Housing & Economic Land Availability Assessment (HELAA HOU/19) have subsequently been assessed and the findings detailed in the Green Belt Review Stage 2 Addendum 2016¹⁰ (GB/3, GB/3a). Therefore, reference to the Stage 2 Review in this topic paper refers to all the sites assessed.
- 2.12 The Stage 2 Review considers the contribution that each site makes towards the four national Green Belt purposes and one local Green Belt purpose. A similar classification was used to the Stage 1 assessment (GB/1); so that levels of

⁷ In 2016 a further ten Green Belt sites were assessed, using the same methodology, following their identification in the Housing and Employment Land Availability Assessment (HELAA) as sites with a potential to contribute to a sustainable pattern of development.

⁸ Green Belt Review Stage 2 Sites Method Statement, 2014:
<http://welhat.gov.uk/CHttpHandler.ashx?id=9483&p=0>

⁹ Welwyn Hatfield Green Belt Review Stage 2, 2014: <http://welhat.gov.uk/greenbeltreviewstage2>

¹⁰ Welwyn Hatfield Green Belt Review Stage 2 Addendum, 2016: <http://welhat.gov.uk/greenbeltreviewstage2>

contribution a site makes to the purposes of the Green Belt have been classified as either 'significant', 'partial' or 'limited or no'. The identification of the strategic and local gaps in the stage 1 review has been key in understanding impact on the Green Belt purposes and the cumulative impact of smaller sites on the Green Belt. Key elements considered are the size of site relative to a gap, presence of existing ribbon development and visual perception of a gap. Landscape considerations were assessed to inform understanding of visual and physical openness.

- 2.13 The findings of the Stage 2 Review generally accord with the overall conclusions of the Strategic Review, but given the different scale of site size, the impact is more varied. The impact on each Green Belt purpose is briefly summarised below¹¹:
- a) **Preventing Sprawl**- Given that generally the sites are relatively small and none of them adjoin the large built up areas of London, Luton and Dunstable and Stevenage, no single site makes a significant contribution to this purpose. However, 8 sites make a partial contribution.
 - b) **Preventing Towns Merging**- The linear nature of the borough's settlement pattern means the gaps between the towns are narrow. Therefore, the potential for coalescence proved to be the most significant impact within the assessment. Sites rated to make a significant contribution to this purpose make up 18.5% of the land in strategic parcels identified as significant. Therefore, sites making a significant contribution, located with parcels making a significant contribution account for 1.5% of Welwyn Hatfield's Green Belt land. In addition, 33 Stage 2 sites make a partial contribution.
 - c) **Protecting countryside from encroachment**- Nearly half of all sites make a significant contribution to this purpose. However, sites that rate as being significant only make up 5.2% of the land in strategic parcels that were identified as significant in the Stage 1 Review. This reflects the small scale of the sites in relation to the relatively large parcels such that, in general, their development would not result in significant impact.
 - d) **Preserving historic setting** – This purpose is not the most important in Welwyn Hatfield, only 3 sites make a significant contribution and two of these fall within the same strategic parcel, which also significantly contributes to this purpose.
 - e) **Maintaining settlement pattern**- Reflecting the linear distribution of the settlements within Welwyn Hatfield, nearly half of the sites assessed contribute significantly to the local purpose of helping to maintain the settlement pattern. This is to be expected given that towns and villages are relatively close together and some local gaps are relatively fragile. Many of these local gaps fall within strategic gaps identified in the Stage 1 Strategic Review demonstrating there is a relationship between the local purpose and the national Green Belt purpose to prevent towns from merging. The strategic and local Green Belt gaps in the borough are set out in appendix 2.
- 2.14 In total, only 7 of the 76 sites assessed made a limited or no contribution to the Green Belt (see table 1). In total these sites could only deliver 32 dwellings and 1 Gypsy and Traveller pitch. Although one way of assessing which areas of land to release could be to take forward these sites, this would clearly not meet housing need and ignores the balancing exercise needed to ensure the most sustainable sites are allocated. Paragraph 84 of the NPPF outlines that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. In this context, the sites that appear to have

¹¹ Green Belt Review Stage 2 Addendum, 2016: <http://welhat.gov.uk/greenbeltreviewstage2>

least harm on the Green Belt purposes are not all the most sustainable when taking into account other issues such as site suitability and deliverability, impact on the Green Belt boundaries, environmental impact and infrastructure provision.

Table 1: Sites that make a limited or no contribution to the Green Belt

Site reference	Location	HELAA Assessment	HELAA Capacity estimate (net)
Cuf2	38-44 The Ridgeway, Cuffley	Suitable, available and achievable	8
GTLAA03	The Willows, Marshmoor Lane, Welham Green	Suitable, available and achievable	1 pitch
LHe1	Land north of Hawkshead Road, Little Heath	Suitable, available and achievable	2
OMH3	Land behind Worth House, Danesbury Park Road, Oaklands	Withdrawn	0
OMH7	Land at 22 The Avenue, Oaklands	Suitable, available and achievable	12
WeG1	Welham Manor House	Suitable, available and achievable	10
WeG2	South of Welham Manor, Welham Green	Available, but unsuitable and unachievable	0

Source: Green Belt Review Stage 2 Addendum 2016 and Housing and Economic Land Availability Assessment (HELAA) 2016.¹²

¹² HELAA, 2016: <http://welhat.gov.uk/article/6379/Housing-and-Employment-Land-Availability-Assessment-2016-HELAA>

Overall conclusions of the purposes assessment

- 2.15 The Green Belt purposes assessments demonstrate that land in Welwyn Hatfield still performs an important Green Belt role and that there is limited land in sustainable locations which performs a 'limited or no contribution' role with regard to the national purposes. If the need for housing and employment is to be met then some harm to the purposes of the Green Belt would need to be accepted.
- 2.16 The Green Belt Review does not balance the Green Belt purposes with sustainability objectives so is clearly only one part of the decision process for where Green Belt boundaries should be amended.

Site selection

- 2.17 In summary, both the Green Belt Reviews give the Council a good understanding of the harm that releasing land from the Green Belt will have on the Green Belt purposes. Clearly depending on the assessment of harm the selection of particular sites will ameliorate or increase impact. However, to deliver the most sustainable development, the Council needs to balance the harm to the Green Belt with the benefits of releasing land from the Green Belt. For example, the benefits of providing a new neighbourhood on land released from the Green Belt with sufficient critical mass to provide a new secondary school and other community facilities would have to be weighed against its impact on the purposes of the Green Belt in that particular area. Another example might be the release land from the Green Belt around a village which would be harmful to the Green Belt but might mean that extra demand for services enables the village's local services to be maintained or improved.
- 2.18 The Housing and Employment Site Selection Background Papers, 2016¹³ (HOU/20 and ECO/8), set out this balancing exercise to assess, on the basis of the evidence, if the harm outweighs the benefits of bringing forward sites. The impact on the Green Belt is assessed alongside other sustainability issues and conclusions have informed which sites are allocated in the Local Plan. The process has also identified the cumulative impacts associated with combinations of sites. To inform site selection weighting has been applied. Greater weight is afforded to the contribution a site makes to national Green Belt purposes in recognition of the importance afforded to them by the NPPF. The contribution of a site to the local purpose is included (at a lower weighting) because it prevents coalescence and maintains the existing settlement pattern. However, it was only used in combination with other reasons where sites were ruled out. Details of the weighting, the strands of evidence and appraisal used and site assessments are set out in the Housing and Employment Site Selection Background Papers (HOU/20 and ECO/8).

¹³ Housing Site Selection Background Paper, 2016: <http://welhat.gov.uk/housingsiteselection>

Employment Site Selection Background Paper, 2016: <http://www.welhat.gov.uk/employmentsiteselection>

Section 3: Green Belt boundaries

- 3.1 In defining Green Belt boundaries, the NPPF (para. 85) requires that they should be defined clearly, using readily recognisable physical features that are likely to be permanent. The Green Belt Review Stage 2 (GB/2, GB/2a, GB/2b, GB/2c, GB/3, GB/3a) analysed the boundaries of sites in some detail, identifying if boundaries were weak, moderate or strong¹⁴. However, it did not assess if a new boundary resulting from the release of a site from the Green Belt would be as good as the existing one or better. The strength of existing and proposed Green Belt boundaries have therefore been appraised in order to consider potential impact on the permanence of the Green Belt if weaker Green Belt boundaries are created.
- 3.2 Recommendations were identified in the Stage 2 Green Belt Review about what would need to be considered and these have informed the Green Belt boundary assessment undertaken as part of the site selection process.

Appraising the Strength of Existing and Proposed Green Belt Boundaries

- 3.3 In response to the recommendations of the study conclusions and to inform the Site selection process for the Local Plan the following table set out the categories of physical features applied to the assessment of existing and proposed Green Belt boundaries of proposed sites for Allocation in the Local Plan. This is based on the boundary site criteria used for the Welwyn Hatfield Green Belt Review Stage 2 (para. 2.3.6, p 5). Historically, the Green Belt in the borough has been drawn quite tightly around property boundaries as well as along strong physical features such as railway lines or motorway. This approach reflects the close proximity of settlements and as a consequence, the need to maximise the gap.

Table 2: Criteria used to assess strength of Green Belt boundaries

Strong (Prominent physical features)	Moderate (less physical features)	Weak (No definable or weak boundary on the ground)
<ul style="list-style-type: none"> • Roads (Motorways/A and B roads) • Railways • Buildings/urban edge • Extensive/Ancient Woodland • Rivers (Lea and Mimram) 	<ul style="list-style-type: none"> • C Roads and unclassified minor roads • ROW: Public footpaths, bridleways, cycle ways • Property boundaries • Small woodland • Streams/brooks (all other watercourses except the Lea and Mimram) • Established tree belt/hedgerow (continuous or with minor gaps) • Distinctive topography, e.g. ridgeline 	<ul style="list-style-type: none"> • Environmental designation • Pylons/towers supporting overhead lines • Fragmented hedgerow • Ditches • Individual or small clusters of trees • Fragmented tree belt/hedgerow • Farm track (not a ROW) • No definable boundary.

Source: Site Selection Background Paper: Housing Sites, 2016

¹⁴ Welwyn Hatfield Green Belt Review Stage 2, 2014: <http://welhat.gov.uk/greenbeltreviewstage2>

- 3.4 Using these criteria, an appraisal of Green Belt boundaries compares, on a site by site basis, the relative strength of existing and proposed boundaries. The weighting given to the strength of the Green Belt Boundaries is considered in the Site Selection background papers (HOU/20 and ECO/8).¹⁵
- 3.5 The site selection process also considered whether the site would have an effect on a fragile gap. For the purposes of site selection the definition of a fragile gap equates to a gap of around 1km. If a fragile gap exists then the new Green Belt boundary should default to new property boundaries rather than the full extent of the site, even if this may have stronger physical features on the ground. More weight in site selection was given to the gap between first tier settlements. However, other fragile gaps between 2nd and 3rd tier settlements were noted. The explanation of the weighting is explained in the site selection background papers.
- 3.6 Potential for cumulative impact is also considered in the site selection process. The impact on the Green Belt purposes is likely to be increased if several sites in a strategic Green Belt gap are developed.

Proposed changes to the Green Belt boundary

- 3.7 If adopted, the Local Plan will remove a number of sites from the Green Belt. A number of minor consequential changes to the Green Belt boundary have also been proposed which are associated with the release of these sites. These are listed in the Draft Local Plan Proposed Submission Policies Map (SUB/5) in the schedule of changes from 2005 District Plan Proposals Map to Draft Local Plan Policies Map 2016 and in the Policies Map Changes, 2017 (SUB/4). These changes are also identified in appendix 1, which has been prepared to assist the Examination.

Section 4: Major Developed Sites

- 4.1 The submission Local Plan retains the approach to the existing Major Developed Sites (MDS) in the borough. The NPPF has removed the specific reference to Major Developed Sites set out in previous government guidance. However, paragraph 89 of the NPPF makes provision for limited infilling or the partial or complete redevelopment of previously developed sites, where it would not impact on the openness of the Green Belt. This is consistent with the Council's approach on Major Developed Sites
- 4.2 Following the publication of Planning Policy Guidance (PPG) 2 Green Belts in 1995, The Welwyn Hatfield District Plan Alterations No.1 (adopted in 1998) first designated Major Developed Sites in the borough. The factors considered in the original designation were:
- a) The size of the site;
 - b) The amount and scale of built development on the site
 - c) The number of employees or level on the site

¹⁵ Housing Site Selection Background Paper, 2016: <http://welhat.gov.uk/housingsiteselection>

Employment Site Selection Background Paper, 2016: <http://www.welhat.gov.uk/employmentsiteselection>

- d) The ability for further development to take place on the site without prejudicing the objectives of the Green Belt

4.3 Each site put forward was in single ownership and had a building footprint of over 10,000m², which comprised at least 15% of the defined site. There are five sites currently designated as Major Developed Sites all of which are or were large research or educational establishments with a large number of employees.

- The Frythe, Welwyn
- New Barnfield Resources Centre, Hatfield
- Queenswood School, Brookmans Park
- The Royal Veterinary College, North Mymms
- Monks Walk and Tewin Water School, Welwyn Garden City

4.4 Changes to the designation and boundaries of the Major Developed Sites are outlined in appendix 1. The Frythe is not being taken forward in the Local Plan because it is currently being redeveloped for housing (nearing completion) and is in multiple ownership so no longer meets the criteria above. A new MDS boundary is being proposed for the Royal Veterinary College following their representation to the Emerging Core Strategy, 2012 (SUB/1b). The revised boundary is not as large as the College requested, but the Council considered it the most suitable option for facilitating appropriate development in the Green Belt. Proposed revisions to Queenswood School MDS have not been agreed by the Council because they would expand the site considerably and not constitute appropriate development.

4.5 In response to the Emerging Core Strategy there have been a number of submissions in relation to designation of new sites as Major Developed Sites. The sites, which include the Oshwal Centre at Potters Bar, Mill Green Sewerage Treatment Works and Brookmans Park Transmitting Station are not considered to have met the criteria for designation.

4.6 The boundaries of the four Major Developed Sites are identified in the policies map (SUB/5). Any infill development or replacement buildings will need to comply with the criteria of Policy SADM 34 and should come forward in the context of a masterplan.

Section 5: Infilling in villages

- 5.1 There are a number of villages and hamlets in the borough within the Green Belt. These settlements are commonly characterised by a linear pattern of built development on or along the main road routes. In light of guidance in paragraph 89 of the NPPF that limited infilling in villages is not inappropriate development in the Green Belt, Policy SADM 34 sets out the criteria to facilitate such development. The aim of the policy is to permit small-scale development within a continuous built up frontage. The provision of no more than 4 net dwellings is used to benchmark the Council's understanding of small scale development and reflects the policy approach in the Local Plan which allocates development of 5 dwellings and over in the Excluded villages.

Section 6: Summary

- 6.1 This Topic Paper explains how Welwyn Hatfield Borough Council has considered the justification for the need to release a proportion of the borough's Green Belt land in order to help deliver identified housing and employment needs. It also explains the impact on the purposes of the Green Belt of releasing parcels of land. Specifically, it has referred to the evidence relating to the acuteness of need and the lack of sustainable alternatives as representing exceptional circumstances for Green Belt release. It also explains how the impact of proposed development on the Green Belt purposes and boundaries have been assessed and then taken into account during the site selection process. Finally it has clarified the Council's approach to some aspects of development within the Green Belt as set out in Submission Local Plan Policy SADM 34

Appendix 1

Schedule of Green Belt Boundary changes

Policy Map reference	Description	Reason for boundary change
PMC59	Removal of land from the Green Belt east of London Road, Woolmer Green	Consequential change to allow for development of proposed housing site HS15 and to create defensible new Green Belt boundaries along the ridgeline.
PMC60	Removal of land from the Green Belt south of the Avenue, Oaklands and Mardley Heath	Consequential change to allow for development of proposed housing sites HS16, HS17 and HS32 (GTLAA04), and to create defensible new Green Belt boundaries.
PMC61	Addition of land to the Green Belt north of Clock House Gardens, Welwyn	Consequential change to maximise the gap between Welwyn and Oaklands & Mardley Heath following the allocation of HS16, HS17 and HS32; and reflect the actual built area of Clock House Gardens following its redevelopment.
PMC62	Removal of land from the Green Belt at the Vineyards, Welwyn	Consequential change to allow for development of proposed housing site HS18 and to create defensible new Green Belt boundaries.
PMC63	Removal of land from the Green Belt at Sandyhurst, Welwyn	Consequential change to allow for development of proposed housing site HS19 and to create defensible new Green Belt boundaries.
PMC64	Removal of land from the Green Belt at School Lane, Welwyn	Consequential change to allow for development of proposed housing site HS20 and to create defensible new Green Belt boundaries.
PMC65	Removal of land from the Green Belt at Symondshyde, Hatfield	Consequential change to allow for development of new settlement SDS6 and to create defensible new Green Belt boundaries.
PMC66	Removal of land from the Green Belt at North West Hatfield, south of Coopers Green Lane. Proposed development site, plus the A1(M) alongside the site, allotments south of the site along Green Lanes, and playing fields south and east of the site to the west of Mulberry Mead and north of Hatfield Avenue	Consequential change to allow for development of proposed strategic development site SDS5 and to create defensible new Green Belt boundaries, whilst also defining a north eastern boundary to maximise the separation between Welwyn Garden City and Hatfield.
PMC67	Removal of land from the Green Belt opposite Hatfield Avenue Coopers Green Lane, Hatfield	Consequential change to allow for development of proposed housing site HS34 (GTLAA09)

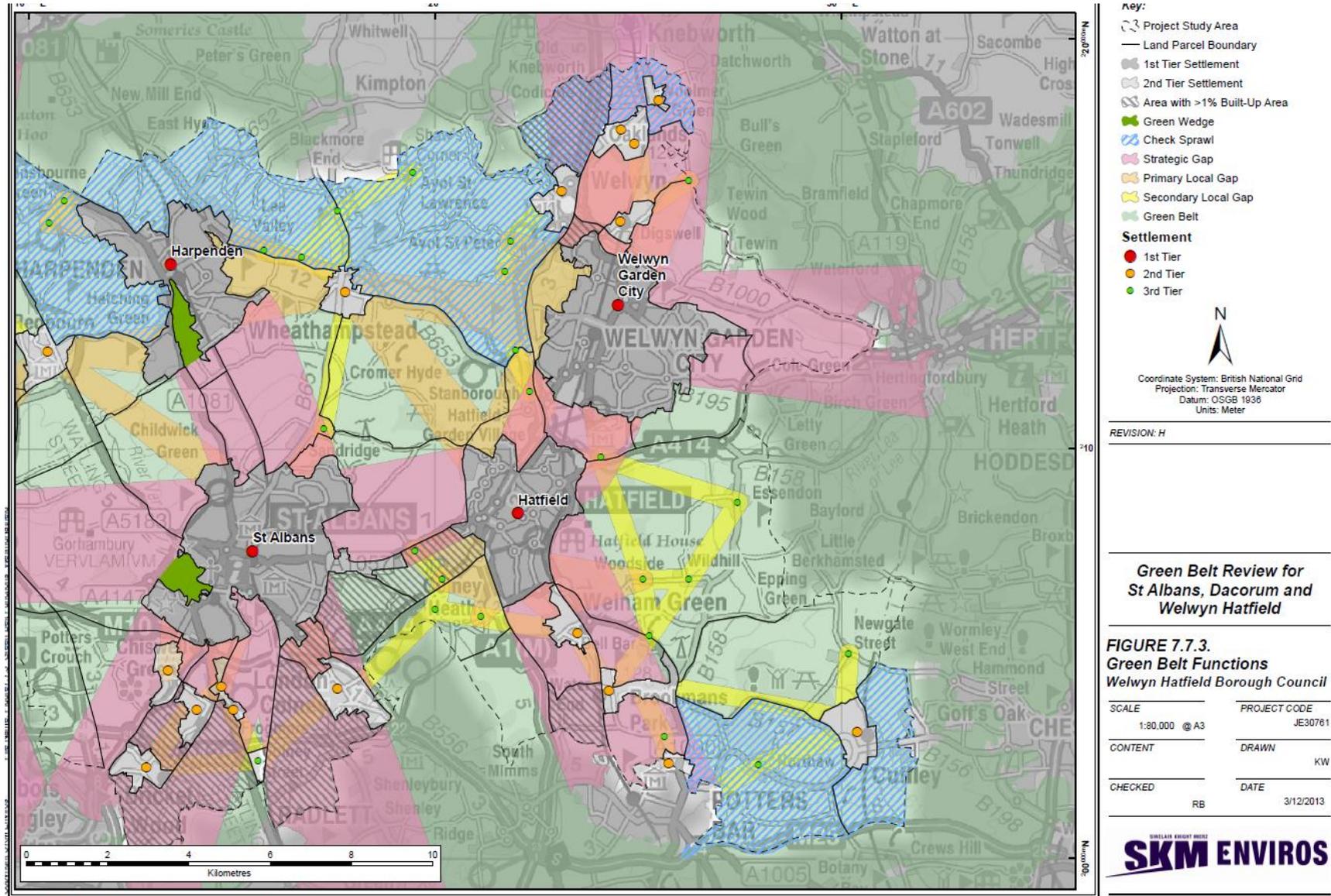
Policy Map reference	Description	Reason for boundary change
PMC68	Removal of land from the Green Belt from the southern tip of the Citroen Garage site west of Great North Road, Hatfield.	Southern tip of the site is developed so does not contribute to the purposes of keeping land within the Green Belt.
PMC69	Addition of land to the Green Belt to the north east of site SDS1, Panshanger Aerodrome, Welwyn Garden City	Consequential change to protect the setting of Panshanger Park from the impact of the proposed development site SDS1.
PMC70	Removal of land south east Welwyn Garden City for development of site SDS2; plus land south west of the site at Burnside, and east and north of the site as far as the A414 and the borough boundary	Consequential change to allow for development of proposed strategic site SDS1 and to create logical and defensible new Green Belt boundaries.
PMC71	Removal of land from the Green Belt at Creswick, south of Welwyn Garden City	Consequential change to allow for development of proposed housing site HS2 and to create defensible new Green Belt boundaries.
PMC72	Removal of land from the Green Belt at Barbaraville, Hertford Road, Mill Green	Consequential change to allow for development of proposed housing site HS33 (GTLAA08) and to create defensible new Green Belt boundaries. Southern boundary tightly drawn to protect a fragile gap.
PMC73	Removal of land from the Green Belt at South Way, Hatfield. Includes South Way as it runs between the site and the previous urban boundary of Hatfield	Consequential change to allow for development of proposed housing site HS11 and to create defensible new Green Belt boundaries.
PMC74	Removal of land from the Green Belt at Marshmoor, Welham Green for development of site SDS7, Welham Green. Plus surrounding existing built development and the East Coast Main Line as it runs between these area and the previous urban boundary of Welham Green	Consequential change to allow for development of proposed housing site SDS7 and to create defensible new Green Belt boundaries. Northern boundary defined to maintain visual openness north of the site.
PMC75	Removal of land at Foxes Lane, south of site SDS7, Welham Green. Plus land between the site and Foxes Lane	Consequential change to allow for development of proposed housing site HS35 (GTLAA01) and to create a logical and defensible boundary.
PMC76	Removal of land from the Green Belt west of Brookmans Park Station.	Consequential change to allow for development of proposed housing site HS22

Policy Map reference	Description	Reason for boundary change
	Plus the East Coast Mainline and Brookmans Park Railway Station between the site and the previous urban boundary of Brookmans Park	and to create defensible new Green Belt boundaries.
PMC77	Removal of land from the Green Belt east and west of Golf Club road, Brookmans Park. Plus Golf Club Road as it runs between the two sites	Consequential change to allow for development of proposed housing sites HS21 and HS23 and to create defensible new Green Belt boundaries.
PMC78	Removal of land from the Green Belt south of Hawkshead Road, Little Heath. Plus Hawkshead Road as it runs alongside the site	Consequential change to allow for development of proposed housing site HS24 and to create defensible new Green Belt boundaries. Western boundary drawn tightly to protect a fragile Green Belt gap.
PMC79	Removal of land from the Green Belt north of Hawkshead Road, Little Heath. Plus the parts of residential properties to the east which were previously part within the Green Belt	Consequential change to allow for development of proposed housing site HS25 and to create defensible new Green Belt boundaries.
PMC80	Removal of land from the Green Belt north of the Meadway, Cuffley. Plus the Hertford Loop Railway Line as it runs between the site and the previous urban boundary of Cuffley	Consequential change to allow for development of proposed housing site HS27 and to create defensible new Green Belt boundaries. Eastern boundary defined to continue settlement pattern and minimise loss of Green Belt land.
PMC81	Removal of land from the Green Belt south of Northaw Road West. Plus Cuffley School to the north of the site	Consequential change to allow for development of proposed housing site HS28. Given the location of the school between the site and the previous urban boundary of Cuffley it is logical to remove it from the Green Belt with HS28 to create defensible new Green Belt boundaries.
PMC82	Removal of land from the Green Belt north of Northaw Road East and Wells Farm, Cuffley. Plus Northaw Road East as it runs alongside the sites	Consequential change to allow for development of proposed housing sites HS29 and HS30 and to create defensible new Green Belt boundaries. North western boundary defined as a consequence of the topography, to reduce impact on the visual openness of the Green Belt by limiting development to the lowest area of land.

Schedule of changes to the Major Developed Sites in the Green Belt

Policy Map reference	Description	Reason for boundary change
PMC83	The Frythe, Welwyn	The site has been redeveloped for housing and is under multiple ownership, so no longer meets the criteria for designation as a major developed site in the Green Belt.
PMC84	Royal Veterinary College	Minor amendments to site boundaries, which would constitute 'appropriate' development within the Green Belt - limited infill of a major developed site.

Appendix 2:
Figure 7.7.3 of the Green Belt Review Purposes Assessment, 2013





**WELWYN
HATFIELD**