

Examination into the Welwyn/Hatfield Local Plan

Stage 2 Hearing Statement - Overarching Strategy 24-27 October 2017

This hearing statement is submitted by Peter Miller on behalf of the Water End Residents Group and is with specific regard to Agenda item 4:

Item 4 Green Belt Review

Has an objective assessment of the contribution land makes to the purposes of the GB been undertaken?

Do the proposed revisions to GB boundaries result in stronger boundaries that will endure well beyond the life of this plan?

We note the Council's response (EX14) to the Inspector's preliminary questions (EX09) regarding SP3 Settlement Strategy (question numbers 15, 16 & 17) which states that they believe that *"the release of the land from the Green Belt has been objectively undertaken, using a methodology that has produced sound conclusions"*.

Whilst the above statement may be generally true in relation to the purposes of the Green Belt, we disagree that sound methodology has been used or conclusions reached regarding GB boundaries, particularly in relation to their intended permanence in the long term and their capability of enduring beyond the plan period.

Consultants were used by WHBC to produce two detailed studies to inform the assessment of harm to the Green Belt purposes, but it was noted that the categories were not definitive. The Stage 2 Green Belt Review Method Statement acknowledges that the main objective of the study was to undertake a 'purposes' assessment, and that a more detailed boundary assessment would need to be undertaken.

We further note the response (EX14) from the Council to the following preliminary question (EX09):

"Are the proposed new GB boundaries, consistent with the need to have regard to their intended permanence in the long term and their capability of enduring beyond the plan period?"

Council Response: *"Yes, the proposed Green Belt Boundaries are consistent with the need to ensure their intended permanence and endurance beyond the plan period. The Housing and Employment Sites Selection Papers (HOU/20, 20a and ECO/8, 8a) considered the relative strength of proposed Green Belt boundaries (resulting from potential site allocations) compared to existing boundaries in light of whether they can be clearly defined by physical features which are readily recognisable and likely to be permanent. The proposed Green Belt boundaries are considered to help maintain the openness and permanence of the Green Belt throughout the Plan period and beyond"*

How can the Council state that the GB boundaries are likely to be permanent when no assessment on whether they are likely to be maintained beyond the plan period has been undertaken?

The Council did not use consultants to undertake the recommended 'more detailed' GB boundary assessment, which is contained in the Housing Sites Selection Background Paper 2016 (HOU/20, 20a), and instead produced it 'in-house'. Consequently, the balancing methodology used is rudimentary, has

significant shortcomings and does not explore the context of the site boundaries in relation to their setting, how penetrable the boundaries are by development and, most importantly, how defensive and likely the boundaries are to be permanent beyond the Plan period.

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.

Example: Site HS22 (BrP4) Land west of Brookmans Park Railway Station.

The southern GB boundary is simply assessed in the Housing Sites Selection Background Paper Appendices A-K (HOU/20a) as "*Ray Brook ordinary watercourse (moderate)*." No mention is made of the fact that the site will visually connect with the Royal Veterinary College (Major Development Site) a short distance away and clearly visible on the ridgeline, thus significantly reducing the perception and openness of the GB gap between Brookmans Park and Potters Bar, or that the remaining small gap between the RVC and HSS22 will be extremely vulnerable to further encroachment, and hard to defend in the medium and long term.

The western GB boundary is simply assessed in the Housing Sites Selection Background Paper Appendices A-K (HOU/20a) as "*Woodland (strong)*". The classification of this small wood as the same strength as motorways and railways appears to us to be rather tenuous. Although the woodland contains an area of ancient woodland, it is only in the southern part. It is possible that although a designated wildlife site at the moment, there is a very real possibility that the construction and subsequent habitation of 250 dwellings virtually adjacent to the woodland could ultimately result in the declassification of the site, leaving the woodland vulnerable to future development.

The northern GB boundary is simply assessed in the Housing Sites Selection Background Paper Appendices A-K (HOU/20a) as "*Bradmore Lane unclassified road (moderate)*". If allocated, there will actually be enormous future development pressure in the next Plan period on the field to the north of HS22 and to the south of Potterells Medical Centre with the development arguments based on the principal that the new northern boundary would be no further north than the existing northern boundary of Brookmans Park (on the east side of the ECML) and therefore the existing GB gap would not be narrowed, and the new northern boundary of Potterells access road (moderate) would be no weaker than the existing.

The eastern GB boundary is simply assessed in the Housing Sites Selection Background Paper Appendices A-K (HOU/20a) as "*Established tree belt/hedgerow with minor gaps (moderate)*". The boundary is illogical and does not relate well to existing development. A large field will be left between HS22 and the existing urban boundary of Brookmans Park and once again there will be enormous future development pressure to infill the gap.

The above example demonstrates the level of detail that should be considered and be an integral part of the decision making process when allocating sites in the Green Belt. The existing strong western GB boundary (railway) has successfully prevented inappropriate development and coalescence through successive county structure plans and local plans for approximately 70 years. It is unlikely that the new GB boundaries in the example would last beyond the next Plan period.