

STAGE 2 HEARINGS: OVERARCHING STRATEGY

GREEN BELT REVIEW

(a) Has an objective assessment of the contribution land makes to the purposes of the Green Belt been undertaken?

1. Our comments distinguish between the methodology of the Green Belt Review and its application.
2. There is much to commend in the methodology. The Green Belt Review Purposes Assessment, November 2013 provides an excellent background to the policy position in Welwyn-Hatfield and more widely in Hertfordshire and England. At the forefront of consideration in the Local Plan should be the 'key finding' at the bottom of page 37 that "There are few environments so close to world cities which have been able to maintain such a clear distinction between built-up areas and countryside". This is a great achievement of the Green Belt but it would also be very easy to squander by weak forward planning. We consider the document offers a generally thoughtful and clear set of assessments of Green Belt parcels. Those parcels appear to have been selected on a consistent and fair basis. The three-colour grading system for each issue is appropriate for this strategic level of detail, and the maps which result are helpful.
3. Our main concern with this first stage of the Review is that the significance of openness to the Green Belt designation has only been partially factored into the overall assessment in the Borough. Figure 7.7.3 is to a large degree a constraints map of limitations on development in the Green Belt in Welwyn-Hatfield, but surprisingly shows areas already with the most development (more than 1% built-up). This sends mixed messages about where development should be most constrained or considered relatively more suitable. We would have expected Figure 7.7.3 to show areas with least development (up to 0.20% or up to 0.30% in Figure 7.4). The main point here is that the information in Table 7.4 on parcels with a very large degree of openness is barely used again later in the Review process and is essentially lost. We should remind ourselves that the section of the NPPF on Green Belt opens by referring twice to keeping land open in four lines (paragraph 79): this is the fundamental 'aim' of Green Belts, above the detailed 'purposes' (paragraph 80). (There might have been merit in showing the most built-up areas instead in Figure 8.1: 'Land contributing least towards Green Belt purposes'.)
4. Stage 2 of the Green Belt Review extended the assessment from parcels to sub-areas and sites. The document Welwyn Hatfield Green Belt Review: Stage 2 (Sites); Method Statement – Final report, October 2014 explains the detailed methodology for reviewing sites and again has much to commend it. Our main methodological concern is that the criteria adopted for NPPF Purpose 2 (to prevent neighbouring towns merging into one another) and the Local Purpose (to maintain the existing settlement pattern) are too weak. The starting point is that all five purposes in national Green Belt policy should contribute to maintaining the overarching aim of openness. However, two of the assessment criteria for a 'significant' impact in each of the above-mentioned Purposes will not achieve this, namely:

- “There would be an appreciable reduction in the separation of settlements, to the extent that there would be an adverse effect on settlement pattern (contribution to coalescence)”; and
- “The scale of the site relative to the gap means development is likely to result in a marked reduction in physical separation or visual perception of the gap”.

Unless two settlements are already very close to each other, the application of these criteria is likely to result in land adjacent to one or other of the separated settlements being developed. The test is simply too demanding to cause development to be resisted. In effect, therefore, a plot could be allocated adjacent to a town, and then another and then another in a continuous process until the separated settlements were very close to each other before the policy had any real constraining effect. Instead of a map of Welwyn-Hatfield with Green Belt having towns and villages dotted within it, the long term effect would be of a largely built-up Borough with towns separated only by corridors of Green Belt. That is contrary to keeping land open and not what is intended by national Green Belt policy. In any event, Green Belt openness is not just a visual concept but a spatial one.

5. The criteria used in the Stage 2 review, quoted above, are discernibly more accommodating of development than the equivalent criteria used in Stage 1. A list of definitions of purpose to be applied in the Stage 1 assessment is provided in Table 5.4 of the Green Belt Review Purposes Assessment, November 2013. For NPPF Purpose 2 and the Local Purpose, the two relevant criteria there are:

- would a reduction in the gap compromise the separation of settlements in physical terms?
- would a reduction in the gap compromise the separation of settlements and the overall openness of the parcel visually?

These criteria, especially the latter, are much more capable of resisting inappropriate development which would harm openness than are the criteria used in the Stage 2. The significant risk is that the Stage 2 approach would be much more likely to compromise openness.

6. We accept that the Stage 2 methodology faces challenges, such as on how to treat development proposals in relation to gaps between settlements (paragraph 2.6.2). Nonetheless, we do not agree with the assessment approach according to whether there is already some compromise to a gap. For NPPF Purpose 2 and the Local Purpose, a gap is held to be ‘significant’ when: “A strategic gap is already compromised by existing developments (e.g. smaller settlements and ribbon development), and therefore may be vulnerable to further change (recognising the fragility of some gaps)”. We are not opposed to stemming deterioration in gaps between settlements, but we disagree with the implication that where there has been no such compromise, and the gap is largely clear of development, preventing development in that gap matters less. We suggest it matters at least as much or more, because there is a higher quality of openness to protect in line with national policy. Certainly there are no Assessment Criteria to cover this concern.

7. Our second group of concerns relates to how the methodology is applied. Points that were not entirely clear in principle become apparent in practice. Given Save Symondshyde’s interest in Parcel GB43A from Stage 1 and Site Hat15 from Stage 2, we will refer to these locations.

8. Our first concern about the application of the Green Belt Review methodology follows from the issue raised in paragraphs 4-5 above, on the treatment of development in gaps between settlements. This turns out to be significant not only in Stage 2 of the Green Belt Review but in Stage 1 also. The Green Belt Review Purposes Assessment in Annex 1 – Parcel Assessment Sheets for Welwyn Hatfield Borough Council for parcel GB43A states as follows. Under the heading ‘To maintain existing settlement pattern’: “Due to the scale and nature of the gap, any reduction would be unlikely to compromise the separation of settlements in physical or visual terms, or the overall level of visual openness.” This conclusion shows that the assessment criteria noted in paragraph 5 above have not been used in the way we would have expected if the methodology was sound. The statement made might be true if only a hamlet was proposed to be carefully sited within the gap between Hatfield (please note – not so much Welwyn Garden City) and Wheathampstead, but is far wide of the mark for a large development. Openness of the Green Belt in this location would be directly compromised and the risk of neighbouring towns merging would be greatly increased.

9. On the last point, an effort to locate a free-standing new village at Symondshyde could not avoid the risk to the merging of settlements in future because the village would be so close to north-west Hatfield and would have a very poorly defined south-east boundary (i.e. on the Hatfield side). The Housing Sites Selection – Background Paper 2016 Appendix B (Hatfield housing sites – maps and background tables) states of the Hat15 site: “Comments: South/south-eastern boundaries defined by farm track would be weak. Conclusion: Green Belt boundaries may be less of an issue here, as the site is a proposed free-standing settlement within the Green Belt*. Care should be taken with establishing south-eastern long term boundary in particular, as encroachment would tend towards coalescence with north of Hatfield (particularly if Hat1 developed).” In short, development on any scale in parcel GB43A would be likely to cause Hatfield to merge with that development before too long, causing sprawl and more damage to openness.

* This is an extraordinary statement with which we completely disagree: Green Belt boundaries matter everywhere, and should be given particularly careful attention in shaping a new settlement sited wholly within a Green Belt. What is proposed at Symondshyde is a lengthy and essentially indefensible boundary on its key south-east side.

10. Our second concern about the application of the methodology follows from the Stage 1 assessment of parcel GB43A, which concluded in effect that the parcel need not be subject to any ‘further assessment’ for possible allocation for development. The Annex 1 Parcel Assessment Sheet did suggest that a ‘very small area of land’ within it adjacent to Wheathampstead made little or no contribution to Green Belt and recommended this for further assessment. Other parcels too in the Borough were recommended for further assessment. Our concern, therefore, is that a Green Belt Review process which had many admirable features could be so compromised that, soon afterwards, a major site could be allocated there in the submitted Local Plan, despite being within a previously discarded parcel.

11. The Annex 1 Parcel Assessment Sheet found GB43A to be classic countryside displaying just the kind of features supporting the Green Belt which planning policy ought to be retaining and protecting, where: “the level of built development is very low”; “rolling

landform/open fields allow long distance views but wooded areas are more enclosed”; and “a patchwork of traditional open rolling farmland with woodland. Small winding country lanes give the parcel a quiet rural character.”

12. Subsequent to Stage 1 and Stage 2 of the review published in November 2013 and October 2014 respectively, a Stage 2 Addendum was undertaken in June 2016. This included an assessment of the newly proposed Hat15 site using the same Proforma as used previously for all the sites subject to ‘further assessment’ in Stage 2. We challenge aspects of that Hat15 assessment, and we challenge aspects of the treatment of the Hat15 site in the Housing Sites Selection process as reported in 2016. Those are matters for a later Stage of the Examination, but neither of them explain what has changed to make a major free-standing new settlement acceptable in Green Belt terms. We take up this issue in Matter 5.

13. In our view, the Green Belt Review has been compromised and the allocation of the Hat15 site is unjustified in relation to Green Belt. As a result the Plan is unsound.

(b) Do the proposed revisions to Green Belt boundaries result in stronger boundaries that will endure well beyond the life of this Plan?

14. Paragraph 9 above showed that some of the boundaries to the proposed Hat15 allocation were accepted by the Council as ‘weak’ and that this risked the future merger of, at least, Hatfield with the new settlement. We were also critical of the casual attitude of the Housing Sites Selection – Background Paper 2016 Appendix B to the need for firm boundaries to the proposed new settlement. It is readily apparent that the proposed boundaries would not be strong and are therefore unlikely to endure. ‘Filling in the gap’ between two built-up areas will be the proposal by developers in future, no doubt claiming that Green Belt purposes have been compromised in the area. The nature of the countryside between north-west Hatfield and Symondshyde is such that there is no firm boundary available to the eastern and south-eastern edges of the new settlement. With gaps in the woodland the northern boundary is not secure either. These defects cannot be compensated by the much more reliable boundary on the whole of the western side of the proposed settlement. In our view, the inadequacy of providing boundaries to the settlement which will endure is a further reason for not allocating the Hat15 site.

15. In the Green Belt Review Stage 2 Addendum the Site Proforma for Purposes Assessment lists Hat15 Symondshyde Farm among those sites considered to have potential for sub-division. The proforma indicates that the eastern boundary of the site could be pulled back to a public right of way and hedgerow to the north-west, while the north-western boundary could be pulled back to a tree belt and hedgerow within the site, in order to provide a stronger boundary. This demonstrates that the site as presently defined lacks clear, defensible boundaries to a large extent. There is no solution to the SE boundary issue.

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Save Symondshyde
2 Cromer Hyde Lane,
Welwyn Garden City,
Herts AL8 7XE