Welwyn Hatfield Borough Counci
Planning Policy
Council Offices
The Campus
Welwyn Garden City
Herts
AL8 6AE

20th October 2016.

Dear Sirs,

Ref: Representations on behalf of Mr Barry Gray, owner of land at and adjacent to 22, The Avenue, Oaklands, Welwyn, Herts, AL6 0PP in response to the Draft Local Plan Proposed Submission document.

I am writing on behalf of my client, Mr Barry Gray of 29, Glebe Road, Welwyn, Herts, AL6 9PB in response to the proposed Draft Local Plan Submission version, and specifically how the policies and guidance contained in that Plan affect and relate to his land holding at 22 The Avenue, Oaklands, and the land adjacent to that property.

The land at and adjacent to 22 The Avenue is shown on the attached site location plan at Appendix 1 to these representations, edged in red. It should be noted that the blue line shown on that plan represents a right of access granted to British Gas on and adjacent to that line only. I also attach a copy of an aerial photograph taken in the late 1990's of the site, with the surrounding residential area shown, at Appendix 2.

I have completed the appropriate Representation Form and that is attached at Appendix 3. Our response to the questions raised on that Form, are dealt with in this letter and the Form should be read with this letter and all its appendices. Please note that I am requesting that I be allowed to make specific representations at a future Hearing into the Submission version of the Draft Local Plan in relation to the way in which the proposed Green Belt boundary has been determined and drawn up in the Oaklands and Mardley Heath area.

It should be noted that my client has already made representations to the Council's SHLAA and its related 'Call' for housing sites in recent years, and that the Council did not advise that the land at 22 The Avenue should **not** be brought forward for housing, **but instead it has confirmed in writing that the site is considered suitable for development up to a capacity of 12no dwelling units (LPA Site reference OMH7)**. I have attached the Council's response to the SHLAA Call for sites, dated October 2012, with a follow up SHLAA plan dated 2014 attached at Appendix 4.

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Tel 01707 375804
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Director Chris Watts MRTPI BA Hons
Registered Office Riverside House 14 Prospect Place Welwyn Herts AL6 9EN Registered in England No 6420675
VAT Registered No 939 8243 78

It should also be noted from those attachments that the Council itself had already identified the land here as having potential for housing from 2012 onwards, but more recently, because of the site's location within the Metropolitan Green Belt, has not felt able through the emerging Draft Local Plan to give the land a specific allocation for residential development.

Instead, officers have concluded that the western boundary to the Green Belt as it affects Oaklands and Mardley Heath should not be moved from the current boundary line of the A1(M) Motorway. Their response to my client's representations that the site should be removed from the Green Belt is taken from the supporting text to the latest version of the SHLAA dated June 2016 as referred to on the previous page.

It can be seen from that text that officers have concluded that the A1(M) forms a strong, defensible Green Belt boundary and that the site at 22, The Avenue does not form a logical extension to the Green Belt boundary. The Council asserts that moving the Green Belt boundary in this location would mean breaching that strong line. The site at 22 The Avenue has therefore more recently been considered to be 'less favourable'. (See extract from the Council's latest response to this site in the June 2016 SHLAA at Appendix 5.

However in the same SHLAA documentation, the Council advises that this site..."**does not contribute to national or local Green Belt purposes".**

This surely undermines the Council's assertion that the site should, in effect remain in the Green Belt, **when it has clearly accepted that none of the five stated purposes of designating a Green Belt would be undermined or harmed by a residential development on the site.**

It is of course open to my client to make a planning application for up to 12no dwellings and he may well do that in due course. However the continued designation of the site within the Green Belt means that in policy terms at national, and local levels, he will have to demonstrate that 'very special circumstances' exist clearly such as to override the presumption against such a development in national planning guidance, and in the current and emerging statutory development plan.

Such a test is in reality very difficult to overcome. Given the Council has up to now actively encouraged my client to believe that a development of 12no dwellings could be achieved here, it would surely be better to release this site from the Green Belt, so that the normal development management issues and details can be worked out without that Green Belt test being involved.

I would argue that there is an alternative available to the Council and that is to further review the Green Belt boundary in the parts of Oaklands that sit to the immediate west of the A1(M) Motorway and to revise the boundary of the Green Belt, not just so that the land at 22, The Avenue is released from that designation, but so that a similarly strong and robust Green Belt boundary is established further to the west of the A1(M) Motorway along the western boundary of the rear gardens on the right hand side of The Avenue.

Such a revision would release other land holdings on The Avenue where there are already a number of detached residential dwellings present, and where further sympathetic and well design redevelopments of existing dwellings and their plots could deliver even more housing to the Council, without harming the semi rural character of this part of Oaklands and Mardley Heath.

The Council is, after all, considering the removal of substantial areas of land from the Green Belt at Symmonshyde, near Hatfield, and elsewhere between Welwyn Garden City and Hatfield to allow a huge number of residential dwellings and supporting infrastructure to be built in the new Plan period in current Green Belt areas.

In addition The Avenue, on both sides is in reality part of the settlement of Oaklands and does not have the character or appearance of open farmland for example.

The Plan attached at Appendix 6 shows both the current Green Belt boundary along the A1(M) Motorway and what I would consider to be an equally robust and defensible alternative Green Belt boundary. This proposed revised Green Belt boundary would run along the rear gardens of properties on the south western side of The Avenue, and then cut back along Danesbury Park Road and link back into the A1(M) Motorway further to the north.

This would release more land on both sides of The Avenue, including my client's land holding from the Green Belt, and would then enable landowners such as Mr Gray to bring forward small scale redevelopments of their land which could in reality release a substantial number of new dwellings without harming the semi rural character of this area and indeed the settlement of Oaklands.

Appendix 7 to these representations includes three alternative proposals for the land at 22 The Avenue, for between 10 and 12 dwellings. They are all based on using the existing access from The Avenue, and bringing that access up to adoptable standards within the site together with a long passing bay and good visibility splays in each direction,.

The site has already been surveyed for noise impacts, and baseline ecology, and both of these potential environmental constraints can be easily overcome. Mitigation measures have already been drafted and would be brought forward with any future planning application.

In relation to the revising of the Green Belt boundary to the new line now being promoted, I have undertaken a similar review of that proposed new boundary line as Jacobs consultancy undertook as part of their studies on behalf of the Council in 2014.

Their method statement of undertaking the Green Belt review at Stage 2 is set out in the document attached at Appendix 8, and referred to in the Green Belt Purposes Review Addendum dated June 2016, extracts from which are attached at Appendix 9.

I have concluded that in relation to our proposed new Green Belt boundary such a line would:

- Not result in unrestricted sprawl of large built up areas, such as Stevenage or Welwyn Garden City;
- Not undermine in any way the strategic gap between Stevenage and Welwyn, or Welwyn Garden City, so that these settlements would not be merged as a result;
- Not undermine the purpose of safeguarding the open countryside, since this part of The Avenue is already de facto part of the settlement of Oaklands, and contains a number of detached dwellings and their garages;
- Not harm any heritage assets such as historic towns or villages;
- Not assist in the regeneration of towns – although the Jacobs methodology specifically excluded this as a criteria in their assessment.

This corroborates Jacob's own findings which are attached at Appendix 9 (22, The Avenue is numbered OMH7).

Indeed Jacobs confirm that OMH7 makes only a limited or no contribution to Green Belt purposes.

That surely must also apply to the dwellings and land to the western side of The Avenue. That is an entirely logical conclusion as well.

The Jacobs report also sets out a number of criteria for determining whether or not a new boundary resulting from the release of land from the Green belt would be as good as the existing boundary or a better one (see also on final page of the extracts at Appendix 9).

It can be reasonably concluded that a new boundary to the Green Belt which follows the strong line of the rear garden boundaries to properties on the western side of The Avenue would:

- Be a robust boundary marked by hedges, trees and fencing;
- Not be penetrable in reality – each property is in a different ownership and there is a clear delineation in visual appearance in character from the rear gardens themselves and the farmland and woodland beyond;
- The new boundary would be consistent and include a road, Danesbury Park Road;
- Not be any weaker than the current boundary (A1(M) in reality even though that road is a motorway. Oaklands and houses in The Avenue exist already to the west of the A1(M). There is a neutral result;
- The new boundary can be maintained for the new Plan period.

Proposed policy SADM34 is also relevant to these representations. The proposed policy contains a new section encouraging Infill developments within certain parameters. The land at 22, The Avenue could meet all of the stated criteria:

- The land is within a continuous built up frontage; on both sides in fact;
- The redevelopment of this land would not in reality extend the built up area of Oaklands into open countryside. The Council itself came to the same conclusion in granting planning permission recently for 2no new dwellings served off the private

drive leading to 22 The Avenue, and 3no houses of The Avenue itself, on land which is also within the Green Belt;

- The redevelopment of this site would not result in the loss of a view or vista which makes a significant contribution to the character of Oaklands;
- The site is small scale, and although the Council has assessed its maximum capacity as being 12no dwellings, four larger detached houses could easily be accommodated as infill frontage development.

By changing the Green Belt boundary to the west and along the rear garden boundaries of properties in The Avenue, this would then mean that in policy terms this land would then fall within a 'village' but would now be outside the Green Belt and would therefore be an 'appropriate' form of development and be able to make a positive contribution to the Council's housing supply within the Plan period without having to deal with Green Belt tests.

In that context Policy SADM34 is actually, broadly supported by my client as being more flexible and adaptable than the previous District Plan Review's lead Green Belt policy, although we see no reason why a maximum number of infill dwellings as being 4 in number is proposed.

Our view that this site and other properties in The Avenue are within the settlement / village of Oaklands is actually supported by the Council's text at paragraph 25.13 in the proposed new Local Plan, where reference is made to the fact that..... ''the Borough contains villages, which are 'washed over' by the Green Belt''.

A new Green Belt boundary as proposed by my client would reinforce the relationship between The Avenue and the settlement of Oaklands and allow sites such as 22, The Avenue to make a more comprehensive contribution to housing supply, without having to clearly demonstrate that 'very special circumstances' exist, as would be the case if the land involved remained in the Green Belt.

It is also considered that such a new boundary would not undermine the existing boundary of the Green Belt in North Hertfordshire District which lies to the immediate north of Danesbury Park Road.

I would be grateful therefore if you could take these representations into account, and allow me to represent my client at the Hearing into the proposed new Local Plan next year when it meets,

Yours Sincerely,



Chris Watts MRTPI DMS

Cc: Mr B. Gray

APPENDICES

APPENDIX ONE

Land Registry
Official copy of title plan

Title number **HD400386**
Ordnance Survey map reference **TL2317NE**
Scale **1:1250** enlarged from 1:2500
Administrative area **Hertfordshire: Welwyn Hatfield**

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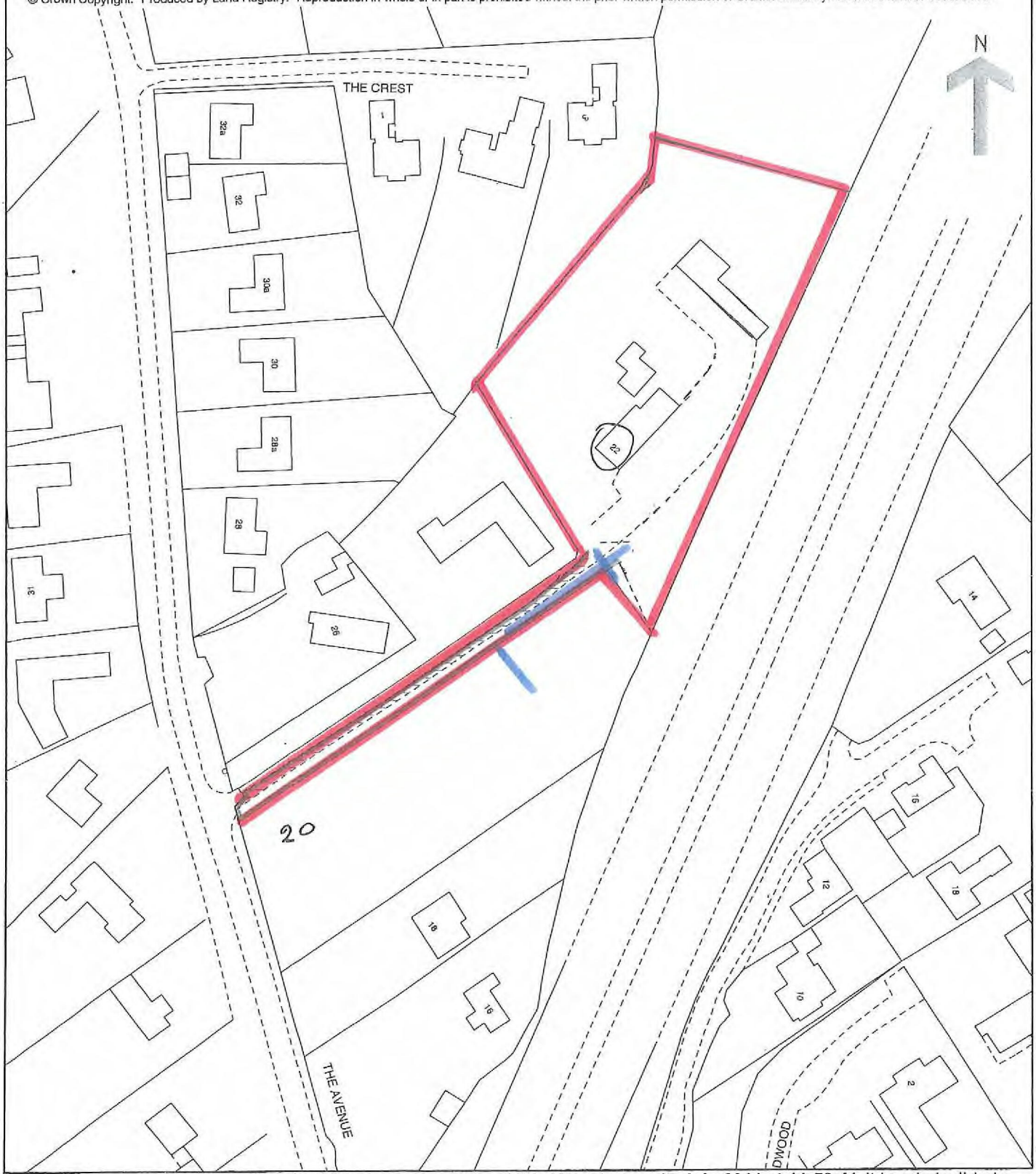


This official copy issued on 19 July 2011 shows the state of this title plan on 19 July 2011 at 11:50:41. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.
This title is dealt with by Land Registry, Leicester Office.

JOHN JYMOTT BRITISH GAS

[redacted]

SENT PDF FILE
06-08-14

22 The Avenue
Welwyn
Herts. AL6 0PP

25-07-14

F.A.O. Mr John Dymott
British Gas New Housing Connections

This is to confirm that British Gas has the right of access onto my land now and in the future for the maintenance of their property at the above address.

Barry Gray

[redacted]

APPENDIX TWO

APPENDIX THREE

Draft Local Plan Proposed Submission Representation Form

August 2016

For office use only

How to get involved

The best way to comment on the **Draft Local Plan Proposed Submission** is online at: **www.welhat.gov.uk/localplan.**
Alternatively, you can complete this form and return it by post to:
Planning Policy, Welwyn Hatfield Borough Council, Council Offices,
The Campus, Welwyn Garden City, AL8 6AE.

Please return to Welwyn Hatfield Borough Council by 5pm Monday 24 October 2016.

This form has two parts –

- **Part A – Personal Details** (you only need to complete this once)
- **Part B – Your Representation(s).** Please fill in a separate Part B for each representation you wish to make.

PART A: Section 1 – Your Personal Details

Please complete this section in full.

However, if you are an Agent representing a client, please complete only the Title, Name and Organisation of your client below and then complete your full contact details in Section 2.

Title MR	**First name** BARRY
Last name	GRAY
Job title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Address Line 2	
Address Line 3	
Address Line 4	**Postcode**
Telephone number	
Email address (where relevant)	

PART A: Section 3 – Monitoring

We use this information to ensure everyone gets fair access to council services. However, you are not obliged to answer any of these questions. Any personal information will be treated in the strictest confidence. No personal information will be passed to a third party.

Do you live in the Borough?

- [x] Yes
- [ ] No

Do you work in the Borough?

- [x] Yes
- [ ] No

Do you represent an organisation or client?

- [x] Yes
- [ ] No

Are you?

- [x] Male
- [ ] Female

Which age group do you belong to?

- [ ] Under 16
- [ ] 16 – 24
- [ ] 25 – 34
- [ ] 35 – 44
- [ ] 45 – 54
- [x] 55 – 64
- [ ] 65 – 79
- [ ] 80+
- [ ] Prefer not to say

Do you consider yourself to have a disability?

- [x] No
- [ ] Yes

If yes, what is the nature of your disability?

N/A

PART B: This is Your Representation

Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will only be allowed at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation, and Agent if applicable:

MAZE PLANNING LTD

ON BEHALF OF MR BARRY GRAY, OWNER OF LAND AT 22, THE AVENUE, OAKLANDS, WELWYN, HERTS, AL6 0PP

To which part of the draft Local Plan does this representation relate?
(Please make a separate representation for each part of the draft Local Plan you are commenting on)

Paragraph Number: 25.13

Policy Number: SP3 & SADM 34

Policies Map Number or Inset Map Name: FIGURE 6, KEY DIAGRAM

Table Number: SETTLEMENT HIERARCHY, TABLE 2

Figure Number: FIGURE 6, KEY DIAGRAM

SEE COVER LETTER FOR DETAIL OF OUR REPRESENTATIONS

Do you consider the draft Local Plan is sound?
(please select one answer)

Yes ☐ No ☑

If no, is this because it is NOT *(see guidance notes for respondents)*:
(please select all that apply)

Positively prepared ☐

Justified ☑

Effective ☐

Consistent with national policy ☐

Please give details of why you consider the draft Local Plan is sound or unsound. Please be as precise as possible. (Attach supporting documents if necessary.)

SEE DETAILS OF OUR REPRESENTATIONS WHICH ARE ATTACHED

If you wish to take part in the examination hearing, please outline why you consider this to be necessary (Please note the Inspector will determine who will be invited to be heard at the examination hearing):

IN ORDER TO BE ABLE TO REVIEW WHY THE GREEN BELT BOUNDARY OF OAKLANDS & MARDLEY HEATH HAS NOT BEEN ALTERED ON THE WESTERN SIDE.

Do you wish to be notified of any of the following? (please select all that apply)

When the Welwyn Hatfield Local Plan has been submitted for independent examination ☑

When the Inspector's Report of the Welwyn Hatfield Local Plan is published ☑

Adoption of the Welwyn Hatfield Local Plan ☑

Signature: [redacted]

Date: 20/10/2016

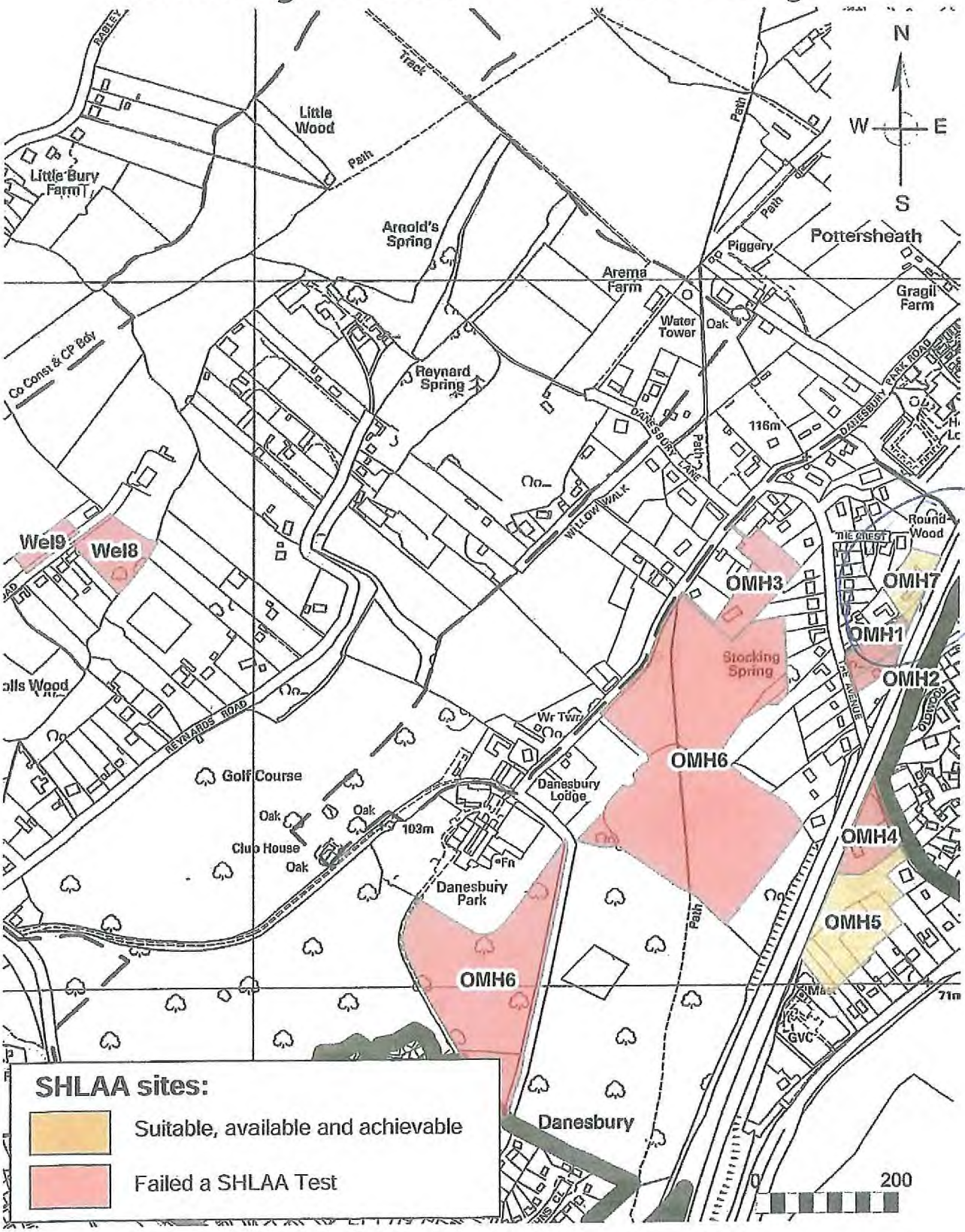
If you have any questions, please contact Planning Policy by email **localplan@welhat.gov.uk** or on **01707 357532.**

We want you to be able to access information and services as easily as possible, in ways that suit you. We can provide information in different formats or give other assistance where needed.
Please call **01707 357000** or email **contact-whc@welhat.gov.uk.**

APPENDIX FOUR

Oct 2012

11. SHLAA Phase 2: Oaklands and Mardley Heath, North of Welwyn



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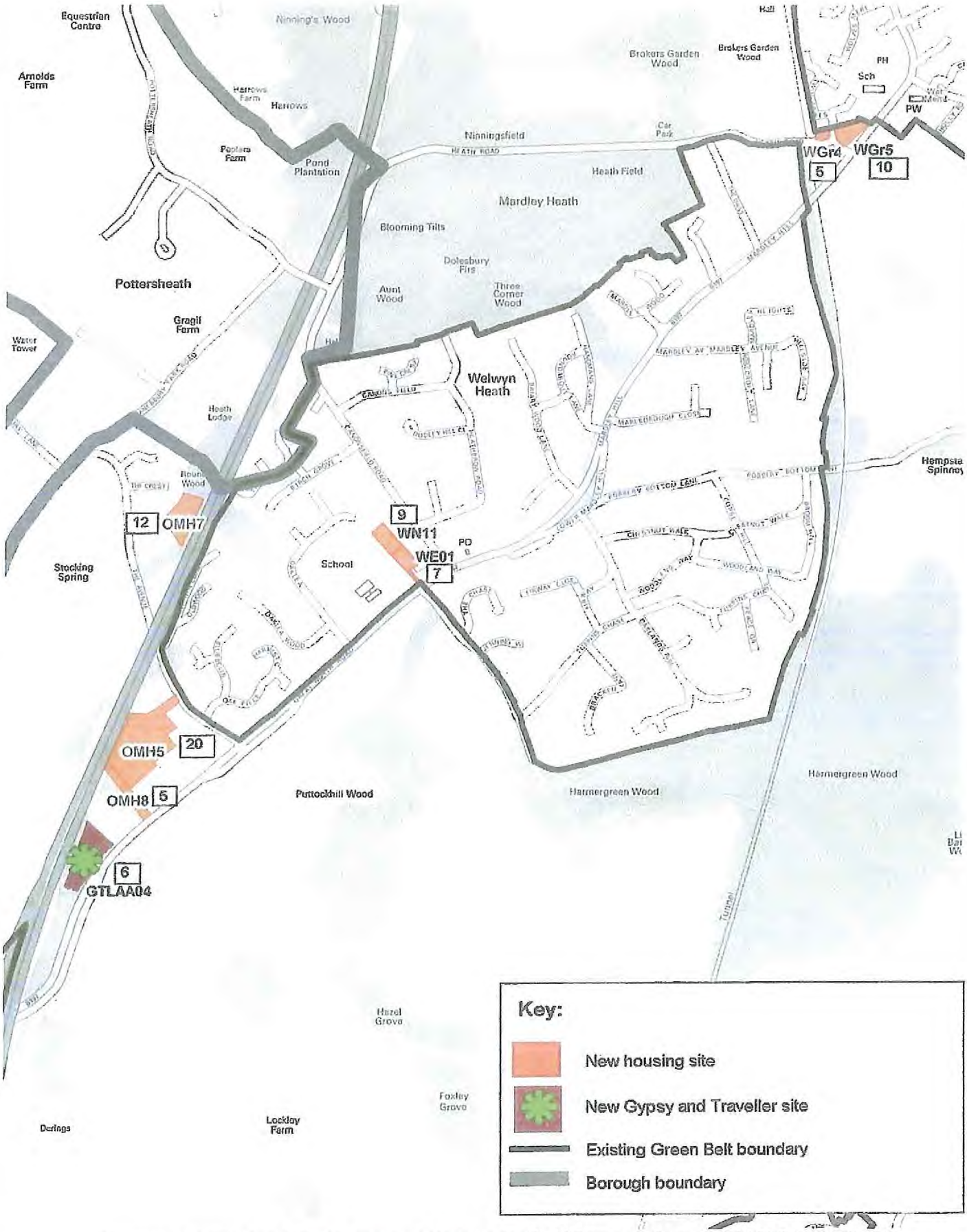
2014

Oaklands and Mardley Heath



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APPENDIX FIVE

Potential for cumulative impact on the Green Belt

One of the national purposes of the Green Belt is to protect towns from merging. The options for sites lie within the gap between Welwyn Garden City and Stevenage and collectively along with sites around Digswell, Welwyn, Woolmer Green and Stevenage would have a significant impact on this gap. On an individual basis, however, the impact would be less significant. Account therefore has also to be taken of the cumulative impact of any Green Belt releases.

The Sites

OMH5 Land rear of 2-12 Great North Road adjoins the southwest boundary of Oaklands and Mardley Heath and is enclosed by existing development and the A1(M).

Environmental issues

- More than half of the landscape has been assessed as of medium sensitivity with medium to high capacity the other landscape area are assessed as high sensitivity and medium to low capacity. Design and layout would need to mitigate impact on the sensitive landscape.
- The proximity to the A1(M) means there is potential for noise and air pollution.
- Wildlife sites located within 500km of the site.

Green Belt

- Site does not contribute to any of the national Green Belt purposes.
- Partial impact on the local purpose to maintain the gap between Oaklands and Mardley Heath and Welwyn.
- A1(M) is a strong boundary but the site has some less defined boundaries. However, in combination with OMH8 (promoted separately), a logical opportunity may exist to redefine the Green Belt boundary.

Accessibility and Infrastructure issues

- Good accessibility to services and facilities
- No specific access concerns

Deliverability issues

- Site in multiple ownership, it is available but no formal joint agreement.
- Possible ransom strip along The Avenue.

Conclusions

With an estimated capacity of 20 dwellings this site is capable of making a contribution to the OAN and the provision of affordable housing. OMH5 and OMH8 have a clear defensible boundary of the A1(M) and there is a logical opportunity to extend the Green Belt boundary. Noise, air pollution and landscape sensitivity can be mitigated by design and layout. The site is considered to be more favourable.

OMH7 Land at 22 The Avenue is accessible to local services but is separated from the existing boundary of Oaklands and Mardley Heath by the A1(M).

Environmental issues

- Existing garden so landscape not assessed.

- The proximity to the A1(M) means there is potential for noise and air pollution, which will need to be mitigated.
- A local nature reserve and a wildlife site are within 500km of the site.

Green Belt

- Site does not contribute to the national or local Green Belt purposes.
- Separated from the existing boundary by the A1(M) which forms a strong boundary to Oaklands and Mardley Heath in both Welwyn Hatfield and North Herts local plans. Moving the Green Belt boundary in this location would mean breaching this existing strong boundary.

Accessibility and Infrastructure issues

- Good accessibility to local services, but weaker accessibility to transport links.
- Access proposals are unclear.

Deliverability issues

- Site in single ownership.
- A Green Belt review in this location could cross the district boundary, so any boundary change would need to be done in conjunction with North Herts District Council.

Conclusions

With an estimated capacity of 12 dwellings this site is capable of making a contribution to the OAN and the provision of affordable housing. OMH7 is not contiguous with the settlement boundary and is separated from the settlement boundary of Oaklands and Mardley Heath by the A1(M) which forms a strong, defensible Green Belt boundary. The site does not form a logical extension to the Green Belt boundary. This site is considered to be less favourable.

OMH8 2 Great North Road adjoins OMH5 and part of the site was originally included in OMH5. It is now being promoted separately.

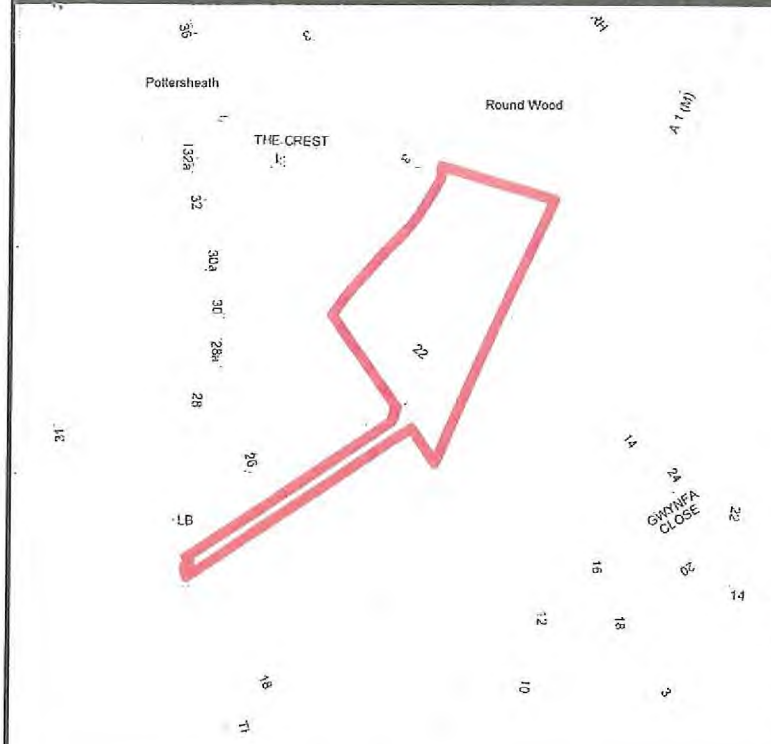
Environmental issues

- Landscape not assessed because of scale of site.
- Previously developed land - B1 office currently occupies the site.
- There are two wildlife sites close to the site, across the Great North Road.
- The proximity to the A1(M) means there is potential for noise and air pollution, which will need to be mitigated.

Green Belt (applied same as OMH5 as no separate assessment)

- Site does not contribute to any of the national Green Belt purposes.
- Partial impact on the local purpose to maintain the gap between Oaklands and Mardley Heath and Welwyn.
- A1(M) is a strong boundary but the site has some less defined boundaries. However, in combination with OMH5 (promoted separately), a logical opportunity may exist to redefine the Green Belt boundary.

Site Reference: OMH7 Site name: 22 The Avenue AL6 0PW



Site details

Settlement	Oaklands and Mardley Heath
Ward	Welwyn East
Site area	0.4 hectares (0.5 with access road)

Site context

Green Belt	Yes
Previously developed	Partially
Land use/character	Residential dwelling, garden.
Surrounding land uses and character	Residential to the north and west. A small wooded area to the north and a tree belt and the A1(M) to the southeast.

Site promotion

Source of promotion	Landowner
Land use promoted	Residential

Map © Crown copyright. All rights reserved Welwyn Hatfield Borough Council LA100019547 2015

Site suitability considerations	Comments
Policy constraints: • Adopted Development Plan • Emerging local policy • National policy	Adopted Development Plan: Green Belt (GBSP1), Towns and Specified Settlements (GBSP2), Biodiversity and Development (R11), IM2 (Planning Obligations) and Planning Obligations SPD, Air Quality (R18), Noise and Vibration Pollution (R19) Landscape Character Area (RA10). Emerging Core Strategy: Critical Assets (CS11) NPPF- Section 11- Conserving and enhancing the natural environment.
Physical constraints: • Access to the site • Infrastructure location/capacity • Ground conditions • Contamination • Pollution • Flood risk • Hazardous risk • Other	• Access via a private drive to the Avenue, which is shared by another property. No objections in principle, subject to appropriate visibility displays and need to allow refuse and servicing vehicles into the site. • Potential for noise and air pollution due to the proximity of the site to the A1(M). • Entire site is within Flood Zone 1 – low risk of fluvial flooding.
Potential environmental impacts: • Landscape character/features • Nature conservation • Heritage conservation • Residential environment/amenity • Other	• LCA 133: Danesbury Settled Slopes. • Garden land, rough grassland with bordering hedgerows and trees. Possible that there are protected species in trees. A1(M) along the eastern boundary is a significant feature in the landscape and the setting of the site. • Low ecological sensitivity, opportunities for woodland planting. • Future occupants could be affected by noise and air pollution from the A1(M).
Contribution to regeneration priority areas	None
Likely market attractiveness for the use proposed	Promoted by landowner adjoining an established residential area. No current developer interest known, but Oaklands and Mardley Heath is likely to be an attractive location. Although the presence and impact of the A1(M) may affect market attractiveness.

JUNE 2016

Availability		Site capacity	
Site ownership	One landowner	Promoted by landowner	12-20 dwellings, 30dph-50dph
Any known constraints	Two parties have rights of access across access road. Restrictive covenant on the land limits development capacity.	HELAA Scenario/methodology	< 2 ha so 40 dph= 16 dwellings.
Achievability		HELAA capacity	12 dwellings
Deliverability issues	Noise and air pollution mitigation. Restrictive covenant needs to be overcome, which could delay development. The parties with rights of access are not considered a legal barrier to development.	HELAA density	30dph
Viability issues	Cost of overcoming the restrictive covenant. Otherwise no known abnormal development costs which would constrain viability.	Comments	Capacity revised down due to proximity of the A1(M) and need to include appropriate mitigation.
Landowner timescales	0-5 years		

Conclusions

The site is considered suitable for development, but the capacity of development has been reduced.

The proximity of the A1(M) means noise and air pollution is an issue. To buffer development from the A1(M) the capacity of the site has been revised down accordingly. At planning application stage air quality and noise surveys and reports would be required to demonstrate that future occupants would not be adversely affected. An applicant will need to demonstrate that appropriate design, layout and mitigation measures can deliver satisfactory internal and external residential environments.

Hedgerows and trees bordering the site could be retained to preserve ecology. If any trees are lost, at a planning application stage the need to compensate any ecological loss should be considered.

Rights of access to adjoining property need to be retained. Restrictive covenant needs to be overcome, which could delay development.

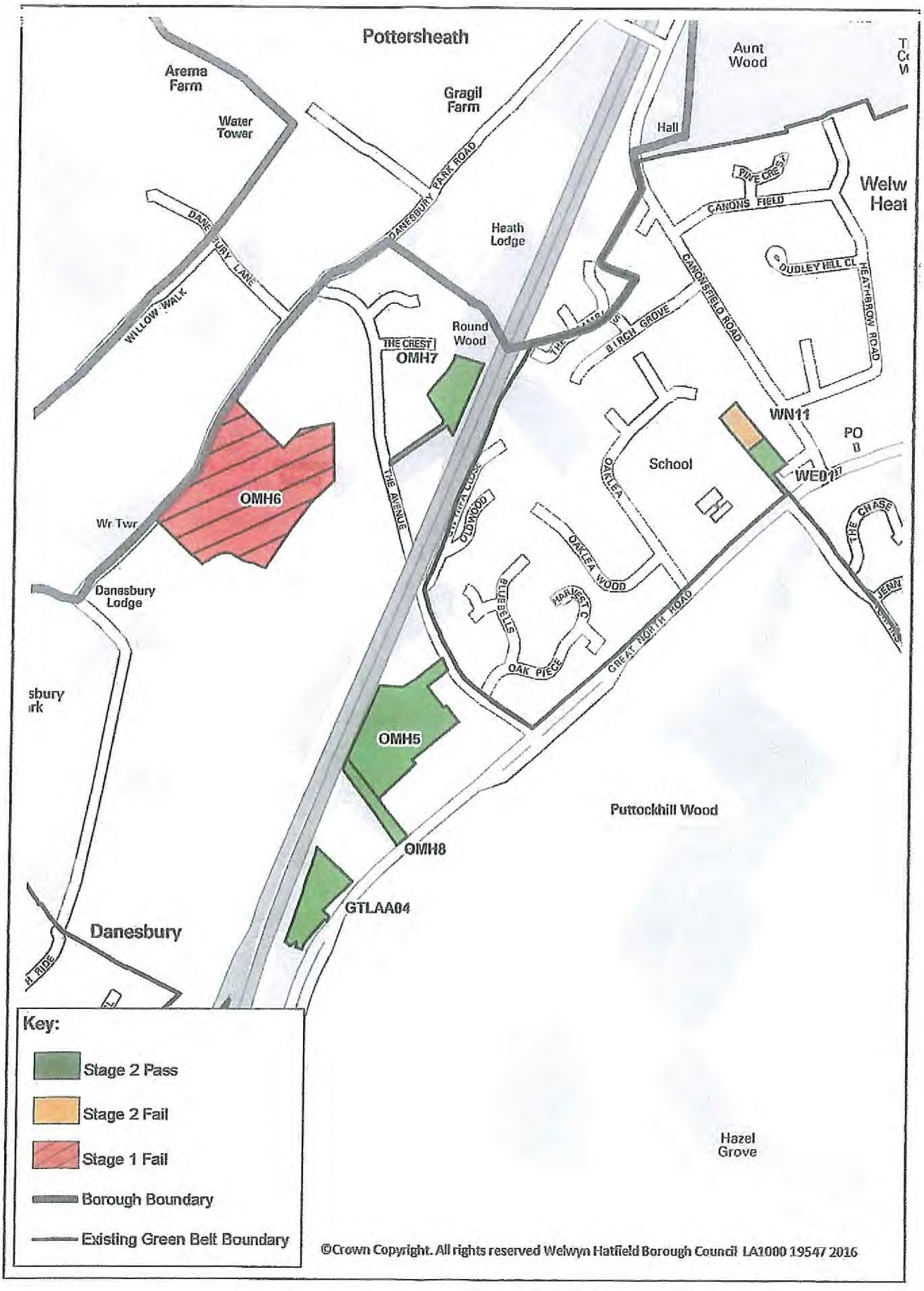
Access onto the Avenue is acceptable in principle but the applicant will need to demonstrate at the planning application stage that visibility splays are adequate and that service and refuse vehicles can use the site.

Delivery: In light of the restrictive covenant, the deliverability timescale of 6-10 years is considered more realistic.

Suitable	Yes	Available	Yes	Achievable	Yes	Deliverability timescale	6-10 years

Oaklands and Mardley Heath

JUNE 2016



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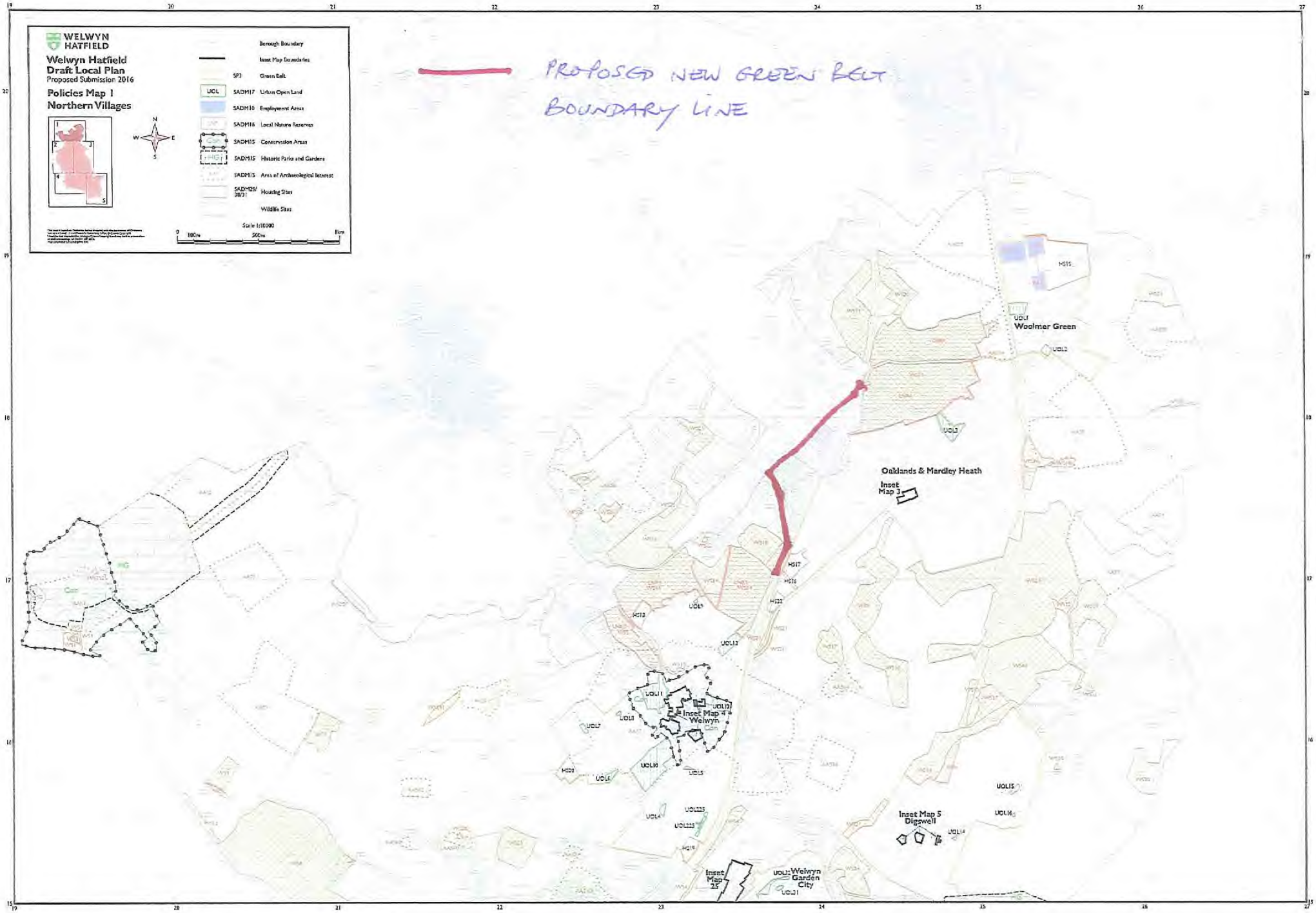
APPENDIX SIX


WELWYN HATFIELD
Welwyn Hatfield Draft Local Plan
Proposed Submission 2016
Policies Map 1
Northern Villages
Borough Boundary
Inset Map Boundaries
SP3 Green Belt
SADM17 Urban Open Land
SADM10 Employment Areas
SADM16 Local Nature Reserves
SADM15 Conservation Areas
SADM15 Historic Parks and Gardens
SADM15 Area of Archaeological Interest
SADM29/ 30/31 Housing Sites
Wildlife Sites
Scale 1:10000
PROPOSED NEW GREEN BELT BOUNDARY LINE
Woolmer Green
Oaklands & Mardley Heath
Inset Map 3
Inset Map 4 Welwyn
Inset Map 5 Digswell
Inset Map 25
Welwyn Garden City

APPENDIX SEVEN

APPENDIX EIGHT

Welwyn Hatfield Green Belt Review

WELWYN HATFIELD BOROUGH COUNCIL

Stage 2 (Sites); Method Statement

Final Report

October 2014

JACOBS®

1. Introduction

1.1.1 This document provides a detailed methodology for the Welwyn Hatfield Borough Council (WHBC) Green Belt Review: Stage 2 - Sites. This work follows on from the *Green Belt Review: Purposes Assessment for Dacorum, St Albans and Welwyn Hatfield* (November 2013). Hereafter this previous strategic study is referred to as the 'Part 1 study', and this Green Belt site assessment as the 'Part 2 study'. This Part 2 study assesses a range of Green Belt sites identified in the WHBC Strategic Housing Land Availability Assessment (SHLAA), the Gypsy and Traveller Land Availability Assessment (GTLAA) call for sites, and a site promoted to be removed from the Green Belt.

1.1.2 This Part 2 study overlaps areas of the Green Belt recommended for further assessment in the Part 1 study, including strategic sub-areas and small scale sub-areas. This land was identified in the Part 1 study as Green Belt land which contributes least towards the five purposes assessed. Sites which lie outside those areas recommended for further assessment are also assessed. The Part 1 study acknowledged that because the review was carried out at a strategic level it was possible that further small scale boundary changes that would not compromise the overall function of the Green Belt might be identified through a more detailed survey.

1.2 Summary of Approach

1.2.1 The methodology for the WHBC Green Belt Purposes Assessment is devised in accordance with the approach adopted to undertake the Part 1 study.

1.2.2 The Part 2 study undertakes a purposes assessment to identify the extent to which each site contributes to each of the five Green Belt purposes[1] below:

- NPPF Purpose 1: To check the unrestricted sprawl of large built-up areas;
- NPPF Purpose 2: To prevent neighbouring towns from merging into one another;
- NPPF Purpose 3: To assist in safeguarding the countryside from encroachment;
- NPPF Purpose 4: To preserve the setting and special character of historic towns; and,
- Local Purpose: To maintain the existing settlement pattern.

1.2.3 The fifth NPPF purpose to assist in regeneration has been discounted from the Purposes Assessment. It was not considered in the Part 1 study.

1.2.4 The study assesses three separate categories of land as follows:

- 'Strategic sub-areas' (as identified in the Part 1 study);
- 'Small scale sub-areas' and areas for 'Boundary adjustment' recommended for further assessment in the Part 1 study;
- WHBC SHLAA, GTLAA and additional sites (AS).

1.2.5 The assessment criteria for the Part 2 study are generally consistent with the Part 1 study. It also utilises the same assessment terminology to classify the extent to which each site contributes towards each Green Belt purpose. This approach ensures consistent analysis and reporting which is important given the large number of sites.

1.2.6 The Assessment of each site is recorded on a standard Site Proforma. This is completed both during the desk-based assessment and on-site assessment. It allows for the following information to be recorded:

- Site Context – including document review of key findings from Part 1 study, relevant designations and landscape features;
- Site and Landscape Appraisal – including document review of WHBC Landscape Sensitivity and Capacity Study and on-site appraisal to validate key findings in relation to land use, topography, land cover, boundary review, levels of enclosure and levels of openness;

[1] The same five Green Belt purposes were assessed in the Part 1 study.

- Green Belt Purposes Assessment – to consider the contribution each site makes towards each of the five Green Belt purposes; and,
- Recommendations – to consider any cumulative impacts (as a result of site grouping), potential for sub-division, and summary and next steps.

1.2.7 The classification of the contribution of each site generally follows the approach adopted in the Part 1 study. Levels of contribution are classified as either 'significant', 'partial' or 'limited or no'. .

1.2.8 The detailed step-by-step methodology is set out in Chapter 2.

2. Methodology

2.1 Sites for Assessment

2.1.1 The first task is to determine the origin of the sites to be assessed. Green Belt land considered to contribute least towards the five purposes assessed in the Part 1 study are considered as well as sites identified set out in the WHBC SHLAA and GTLAA.

2.1.2 The Purposes Assessment therefore categorises assessment sites as follows:

1. Strategic sub-areas in the Part 1 study (SHLAA HAT1 and WGC5[2]);
2. Small scale sub-areas in the Part 1 study (SHLAA sites HAT4 and WGC1); and
3. Remaining SHLAA, and GTLAA sites.

2.1.3 All sites are subject to the same assessment however this site categorisation is important to ensure there is a distinction between those sites which were recommended for further assessment in the Part 1 study and those sites which are being assessed solely by virtue of their inclusion in the SHLAA or GTLAA.

2.1.4 Although the SHLAA and GTLAA sites were not recommended for further investigation in the Part 1 study, they are being assessed in Part 2 to ensure that all Green Belt sites which may be put forward as potentially suitable for release in the emerging Local Plan have been subjected to the same level of assessment. As the Part 1 study was strategic in nature, it was not appropriate to apply a detailed assessment of individual parcels of land which are of the scale typically included in this assessment.

2.1.5 The recommendations in the Site Proforma allow for discussion of potential cumulative considerations as a result of clustering or grouping e.g. potential merging with existing settlements and site boundaries.

2.1.6 The purposes assessment only takes account of the sites, not land beyond the sites. This is particularly relevant to the assessment of clusters or groups and when existing site boundaries are considered to be weak and / or non-permanent. However, where it is obvious that a stronger potential boundary exists in the vicinity of the site this can be identified in the section that identifies the potential for site boundary adjustment.

2.2 Task 1: Desk-based Assessment

2.2.1 Task 1 comprises a desk-based exercise involving a baseline and document review and some initial purposes assessment tasks.

2.2.2 The baseline review considers mapping to show environmental and historic features across the study area. Any designations, as well as agricultural land grade and flood zones, are recorded if located within or adjacent to any assessment sites.

2.2.3 The key findings set out in the Part 1 study are reviewed. The site assessment for the strategic parcel which contains the site is considered. This provides useful context prior to the on-site assessment. The contribution to each of the five purposes is summarised in one line.

2.2.4 This write-up should be clear, concise and factual. Specific designations are named and their geographical relationship to the site stated.

[2] HAT1 is north of Hatfield and WGC5 is Southeast of Welwyn Garden City. Note that WGC5 overlaps with a strategic sub-area but is not identical in extent.

Landscape Considerations

2.2.5 The Purposes Assessment also takes account of issues which relate to key landscape features including topography, land use, hedgerows, tree cover, site boundary characteristics including strength and permanence, and physical and visual attributes of edges as well as levels of landscape enclosure and levels of visual openness.

2.2.6 The landscape elements of the site analysis uses the Landscape of Hertfordshire - Landscape Character Assessment[1] and Welwyn Hatfield Borough Council's, Landscape Sensitivity and Capacity Study (October 2012, and recent update).

2.2.7 The Landscape Sensitivity and Capacity Study provides a detailed landscape appraisal of the specific sites for assessment and informs this analysis and the content of the completed Site Proformas. The overall judgements that relate to both landscape sensitivity and capacity, together with the judgement that follows the landscape capacity matrix, are entered into the Site Proforma.

2.2.8 In accordance with the Part 1 study, and as set out in the glossary, openness is an 'absence of built development or other urbanising elements (not openness in a landscape character sense - topography and woodland / hedgerow cover)'. It is important to acknowledge that levels of openness impact upon all of the Green Belt purposes. For example, openness is a key characteristic of the countryside and it helps maintain gaps between settlements as well as helping to provide setting to historic places. More information of the assessment of the level of openness is set out in NPPF Purposes 3 (section 2.6).

2.2.9 Key findings from the document review are set out in the Site Proforma, to help inform the on-site assessment.

2.2.10 Some components of the Purposes Assessment are undertaken as desk-based tasks prior to site visits. These tasks are explained in more detail in Task 2 and are summarised as follows:

- Review of Part 1 key findings;
- Identification of sites within parcels which contributed towards restricting sprawl (as identified in Part 1 Study);
- Anaysis of strategic gaps, primary local gaps and secondary local gaps; and,
- Identification of historic places.

2.3 Task 3: On-site Assessment

2.3.1 The on-site Purposes Assessment evaluates the contribution a site makes towards each of the five Green Belt purposes. Two people should visit each site to ensure a consistent and robust assessment.

2.3.2 This section explains the approach undertaken to assess each of the five purposes and to set out one of three classifications for each site to reflect a: 1) significant, 2) partial, or 3) limited or no level of contribution towards each purpose. For each site, each classification is typically justified briefly i.e. in no more than two or three sentences, and with reference to site specific characteristics, features or designations.

2.3.3 A Glossary of assessment terms is provided in Appendix A.

2.3.4 A boundary review is undertaken on-site as part of the landscape appraisal of each site. All assessments of boundary strength are from the perspective of the site looking outwards i.e. the strength of the existing Green Belt boundary is not a consideration for this exercise. For the purposes of the on-site assessment the boundary review first considers the existing site boundaries. Each boundary – north, south, east and west – should be summarised with its strength evaluated in brackets.

[1] http://www.hertsdirect.org/services/leisculture/heritage1/landscape/hlca/

2.3.5 In respect of boundary review, the NPPF explains that boundaries should be clear and use physical features that are likely to be permanent. Therefore the assessment should evaluate the existing boundaries of each site, and potentially any sub-divisions, e.g. internal hedgerows, where relevant. Where access limitations impede the ability to evaluate the boundaries fully this is also be recorded on the Site Proforma. As part of the desk-based review, it may be appropriate to supplement the on-site boundary evaluation with a review of aerial photography and Ordnance Survey mapping.

2.3.6 Boundaries may vary around the edge of the site and the analysis should reflect this. The description should reflect the location of the boundary relative the overall site area e.g. northern edge, north-eastern edge etc. The strength of each boundary should be reflected based on the following table. Note that the categories stated are not definitive and a brief description may be appropriate to justify the evaluation.

Strong	Moderate	Weak
Prominent physical features Roads Railways Buildings/urban edge	**Less physical features** Paths/tracks Watercourses Woodlands Hedgerows	**No definable boundary on the ground** Environmental designation Overhead power lines

2.3.7 Where boundaries are considered to be weak, and non-permanent, the assessment considers land beyond existing boundaries to potentially identify stronger boundaries in close proximity to the sites. Any such boundaries are noted on the Site Proforma. The relationship of the site with the existing Green Belt boundary is recorded (e.g. along which edge of the site). If the site is separated from the Green Belt Boundary, this is also recorded.

2.3.8 Given that the main objective of the study is to undertake a Green Belt purposes assessment it is therefore acknowledged that potentially an additional and more detailed boundary assessment will need to be undertaken on sites which are considered to contribute least towards the five Green Belt purposes assessed.

2.4 Assessment of Openness

2.4.1 Openness is evaluated in two key ways to reflect:

- Visual openness (relating to nature of views obtained from the site); and,
- Physical openness (an absence of development).

2.4.2 Openness is not defined in the NPPF, but the consideration of these two factors allows an evaluation of each site to indicate how open it is. The evaluation is based on judgement and different factors could influence the conclusions reached.

2.4.3 Visual openness is based on how visible the site is and the nature of the views that can be obtained to and from it. Potential views could be long, medium and short distance and will be impacted upon by scale of the site, landform and type and strength of site boundaries which all contribute to potential visibility and openness. A short factual description covering views and site characteristics is included in the proformas. Consistent terminology is applied where possible. The overall judgement should describe the site as having high, mixed or low levels of openness as defined below:

High	Mixed	Low
Elevated, ridge top site with clear long distance views over the surrounding landscape.	A site that is partially enclosed (e.g. by landform, vegetation or built form) but there are some views to/from it.	Flat site and context with the site surrounded on all sides by tall trees/vegetation.

2.4.4 Physical openness, in terms of freedom from development, is evaluated in terms of development and built features that exist within the site. Factors that influence this evaluation are built form and other features that have an urbanising influence on the site, e.g. permanent buildings, hardstanding, roads,

industrial fencing. Development does not include evidence of 'walking on the site' (i.e. existing PRoW or permissive footpaths). Key challenges with this evaluation relate to the proportion of land that such urbanising factors occupy e.g. a small site with small structures on it could appear less open than a large site with large structures. A short factual description covering development or absence of development is set out in each proforma. Consistent terminology (as set out in the proforma template) is applied where possible. An overall judgement is made and this is graded high, mixed or low, as defined below:

High	Mixed	Low
No built form or urbanising influences on the site, or where they are present they only cover a small proportion of total site area.	There is some built form, but it is not a defining feature and the majority of the site is undeveloped.	Existing development and urban influences already occupy a considerable part of the site and are a defining element.

APPENDIX NINE

Welwyn Hatfield Green Belt Purposes Review: Stage 2

Addendum June 2016

WELWYN HATFIELD

Introduction

Nearly 80% of Welwyn Hatfield comprises land in the Green Belt (approximately 10,200ha). The remaining 20% consists of the existing built-up areas of the borough's towns and villages. Although there is some capacity to accommodate a limited number of new dwellings on previously-developed land within the urban areas, it is very likely that some land will need to be released from the Green Belt to accommodate housing requirements to 2032 and beyond if the need for housing is to be met.

The Green Belt Review forms an important part of the evidence base for the Council's Local Plan. If it is decided that exceptional circumstances exist for altering the Green Belt boundary it will be necessary to take the findings of this review into account alongside the need to promote sustainable patterns of development. This report is an Addendum to the Welwyn Hatfield Green Belt Review Stage 2, October 2014, and should be read in conjunction with that report. The Stage 2 Review followed on from the Strategic Green Belt Review, November 2013, carried out by SKM for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council.

Addendum

The Stage 2 Review Addendum comprises a Green Belt and a local purposes assessment of an additional 10 sites identified as suitable through the Housing and Employment Land Availability Assessment 2016 and was carried out in 2016 by the Council using the methodology developed by Jacobs (formerly Sinclair Knight Merz (SKM)) for the original Stage 2 Review.

The key output from this work is a site assessment proforma completed for each site through a combination of desk study and fieldwork which assesses the extent to which each site contributes to the following four purposes set out within the National Planning Policy Framework (NPPF)) together with a local purpose identified in the Strategic Green Belt Review:

- NPPF Purpose 1: To check the unrestricted sprawl of large built-up areas;
- NPPF Purpose 2: To prevent neighbouring towns from merging into one another
- NPPF Purpose 3: To assist in safeguarding the countryside from encroachment;
- NPPF Purpose 4: To preserve the setting and special character of historic towns; and,
- Local Purpose: To maintain the existing settlement pattern.

The fifth NPPF purpose is to assist in regeneration and has been discounted from the Review in the Strategic Green Belt Review, as the local policy review demonstrated there was a limited supply of available or unallocated brownfield sites in the districts, the Green Belt as a whole had fulfilled this purpose. Therefore it would not be a differentiating factor between sites.

The assessment of each site records the following information:

- Site Context – this included a document review of the key findings from the Part 1 Study, any relevant designations and landscape features;
- Site and Landscape Appraisal – included a document review of WHBC Landscape Sensitivity and Capacity Study and on-site appraisal to assess land use, topography, land cover, boundary review, levels of enclosure and levels of openness;
- Green Belt Purposes Assessment –considered the contribution each site makes towards each of the Green Belt purposes identified above;
- Other considerations - identified the potential for cumulative impacts (as a result of site grouping), potential for adjustments to the boundary and identification of the possibility for cross-boundary issues; and
- Summary – an overview of key assessment findings.

Levels of contribution have been classified as either 'significant', 'partial' or 'limited or no'. Sites designated as Green Belt are not required to meet all 5 purposes as set out in NPPF. It is possible that a piece of land meeting only one of the purposes may be suitable for Green Belt designation. Sites that make only a limited or no contribution to most or all of the purposes may still make a valuable contribution, but the key factor that limits the contribution may be the size of the site. Sites that are surrounded by Green Belt may not be appropriate for release unless they form part of a larger release i.e. the release of a small isolated site in the Green Belt may be illogical.

What the Green Belt Review does not seek to do is balance Green Belt purposes with sustainability objectives and therefore reach conclusions on whether there should be amendments to the Green Belt boundaries. This is the role for Welwyn Hatfield Borough Council to perform taking account of other evidence base work.

Relationship between Strategic Green Belt Review and Stage 2 Review

In order to understand the cumulative impacts associated with groups of sites the relationships between key strategic and local gaps, the strategic parcels and the sites are shown in Table 1. Please note that the original Stage 2 Review site assessment proformas of individual sites have not been revisited to consider any cumulative impacts associated with the new sites assessed in the 2016 Addendum.

Table 1 Relationship between strategic parcels and sites

Strategic Gap / Local Gap	Strategic parcel	Stage 2 sites	Stage 2 Addendum
Welwyn Garden City - Stevenage	56, 57, 58, 59, 60 (part)	Dig4, GTLAA04, OMH3, OMH4, OMH5, OMH6 North, OMH6 South, OMH7, WGC2, WGC8, WGr1, WGr2, WGr3, WGr4, WGr5	
Welwyn Garden City - Hertford	46, 55	Dig1, GTLAA06, WGC3, WGC5 (part), WGC7, WGC8	
Hatfield – Welwyn Garden City	43A,43B, 44, 46	Hat1, WGC1,	GTLAA09, Hat15 GTLAA08
Hatfield – St Albans	35, 36	Hat2, Hat3, Hat4, Hat5, Hat12,	
Hatfield – Potters Bar	45, 48, 49, 50, 51, 52	BrP7, BrP9, BrP10, BrP12, BrP13, BrP14, Cuf4, Cuf5, Cuf7, GTLAA01, GTLAA02, GTLAA03, GTLAA07, Hat11, LHe1, WeG1, WeG2, WeG3, WeG4a, WeG4b, WeG6, WeG10,	BrP7 extension, WeG12, Land at Bell Bar North East of Brookmans Park, WeG15,
Potters Bar - Cheshunt	52, 53	Cuf4, Cuf5, Cuf6, Cuf7	
Welwyn Garden City / Digswell - Tewin	55	Dig1, GTLAA06, WGC7, WGC8	WGC4
Cuffley - Enfield	53	Cuf1, Cuf3, Cuf6	
Welwyn Garden City - Welwyn	41 (part), 57	Wel4 (part), WGC6 (part)	Wel15,Wel16
Welwyn - Codicote	41 (part), 60 (part)	Wel1, Wel2, Wel6, Wel11	
Welwyn Garden City - Wheathampstead	42	WGC6 (part)	
Not in a strategic or local gap	41 (part), 47, 54	BrP2, BrPTS, Cuf2, Wel3, Wel5,	

Findings of the Stage 2 Review and the 2016 Addendum

For the first national purpose – preventing the sprawl of London, Stevenage or Luton and Dunstable – the methodology acknowledges that because this is a very strategic purpose of the Green Belt, and the sites being considered are typically relatively

small, no single site is likely to make a significant contribution to this purpose. However, eight sites make a partial contribution because they abut or are close to the boundaries of Greater London or Stevenage. These sites make up only 4.8% of the land in strategic parcels that was identified in the Part 1 Review as making a significant contribution to this national purpose.

The second national purpose, preventing towns from merging, has proved to be the most important in this assessment. In the Strategic Review 7.9% of all the Green Belt land in Welwyn Hatfield was found to make a significant contribution to this purpose. Sites in the Stage 2 Review that rate as significant make up 18.5% of the land in strategic parcels that was identified as making a significant contribution to this purpose – in other words, sites making a significant contribution (Stage 2) located within parcels making a significant contribution (Stage 1) make up 1.5% of all the Green Belt land in Welwyn Hatfield. There are a further two sites that make a partial contribution to this purpose and are located within the strategic parcels that make a significant contribution, accounting for a further 8.7% of that land.

Within the strategic parcels that make a partial contribution to the second national purpose, 33 Stage 2 sites make a partial contribution. A further 7 Stage 2 sites make a partial contribution to the second national purpose, but are not located within strategic parcels that do.

Nearly half of all the sites assessed also make a significant contribution to the third national Green Belt purpose of protecting the countryside from encroachment. This is a probable reflection of the fact that, when they were originally defined, Green Belt boundaries were chosen carefully and that, since their definition, the local planning authority has been rigorous in preventing inappropriate development in the Green Belt.

However, sites that rate as being significant in terms of their contribution to the third national purpose only make up 5.2% of the land in strategic parcels that was identified in the Strategic Review as making a significant contribution to this national purpose. This is a consequence of the small scale of the sites in relation to the relatively large parcels such that, in general, their development would not result in significant encroachment.

Only three sites make a significant contribution to the fourth national purpose - to preserve the setting and special character of historic towns, with a further nine making a partial contribution. It is notable that two of significant sites both fall with the same parcel that scores significant for this purpose. A further six parcels in the Strategic Review scored significantly for this purpose, only one contains no sites that score significantly in the Stage 2 Review. So it is clear that this purpose is not the most important consideration for Welwyn Hatfield.

Thirty-five of the 76 sites assessed make a significant contribution to the local purpose of helping to maintain the settlement pattern. A further 29 make a partial contribution. This is to be expected given that the towns and villages in the borough are relatively close together - some local gaps are relatively fragile.

Seven sites made a limited or no contribution to all of the national or local Green Belt purposes – see table 2.

Table 2 Sites which make a limited or no contribution to the Green Belt purposes

Site reference	Location
Cuf2	38-44 The Ridgeway, Cuffley
GTLAA03	The Willows, Marshmoor Lane, Welham Green
LHe1	Land north of Hawkshead Road, Little Heath
OMH3	Land behind Worth House, Danesbury Park Road, Oaklands
OMH7	Land at 22 The Avenue, Oaklands
WeG1	Welham Manor House, Welham Green
WeG2	South of Welham Manor, Welham Green

A further twelve sites did not contribute significantly to any of the national purposes but made a significant contribution to the local purpose.

Table 2A Sites which do not contribute significantly to the national purposes but make a significant contribution to the local purpose

Site reference	Location
Dig4	Junction of Digswell Land and Bessemer Road
GTLAA01	Fox's Lane, Welham Green
GTLAA04	Four Oaks, Great North Road, Oaklands and Mardley Heath
GTLAA07	Thunderbridge Yard
OMH4	Land at 9 The Avenue, Oaklands and Mardley Heath
OMH5	Land rear of 2-12 Great North Road, Oaklands and Mardley Heath
Wel3	School Lane, Welwyn
Wel4	Sandyhurst, The Bypass, Welwyn
WGC2	Digswell Pumping Station, Off Bessemer Road, Welwyn Garden City
WGr4	Twin Foxes / Heath Road, Woolmer Green
WGr5	Twin Foxes / Heath Road, Woolmer Green
	Land at Bell Bar North East of Brookmans Park

A further eighteen sites did not significantly contribute to any of the Green Belt purposes but made a partial contribution to one or more of the national or local purposes – see Table 3.

Table 3 Sites which make a partial contribution to the Green Belt purposes

Site reference	Location
BrP2	Land NE of Great North Road, Brookmans Park
BrP13	West of Golf Club Road, Brookmans Park
BrP14	East of Golf Club Road, Brookmans Park
BrPTS	Brookmans Park Transmitting Station
Cuf7	Wells Farm, Cuffley
GTLAA02	High Dene, Great North Road, Welham Green
WeG12	Land at Pooleys Lane, Welham Green
GTLAA04	Four Oaks, Great North Road, Oaklands
OMH4	Land at 9 The Avenue, Oaklands
OMH5	Land rear of 2-12 Great North Road, Oaklands
WeG4a	Land at Marshmoor
WeG10	Dixons Hill Road, Welham Green
WeG15	Potterells Farm, Welham Green
Wel3	School Lane, Welwyn
Wel4	Sandyhurst, Welwyn By-Pass Road, Welwyn
Wel5	Reserve School Site, Tudor Road, Welwyn
Wel6	Gravel pit site, Kimpton Road, Welwyn
GTLAA08	Barbraville and Surrounds, Hertford Road

A further six sites made a partial contribution to one or more of the national purposes and made a significant contribution to the local purpose.

Table 3A Sites which make a partial contribution to the national Green Belt purposes and make a significant contribution to the local purpose

Site reference	Location
BrP1	Upper Bell Lane Farm, Bell Bar
BrP5	Land west of Brookmans Park, north of Bradmore Lane
Wel11	Vineyards, 15 Codicote Road, Welwyn
WGC1	Creswick, south west of Welwyn Garden City
WGC3	The Holdings, Cole Green Lane, Welwyn Garden City
WGr3	Land adjacent to 52 London Road, Woolmer Green

Eighteen sites were identified that offered the potential to be subdivided by having potentially strong or moderate boundaries within them. These are identified in Table 4. No detailed analysis has been undertaken for sub-divided areas.

Table 4 Sites with potential for sub-division

Site reference	Location
BrPTS	Brookmans Park Transmitting Station
GTLAA02	High Dene, Great North Road, Welham Green
WGC1	Creswick, Welwyn Garden City
WGC5	Land south east of Welwyn Garden City
WGC6	East of Digswell Hill, west of Welwyn Garden City
WGC8	South of Hertford Road, Welwyn Garden City
GTLAA06	North west of Panshanger Airfield, Welwyn Garden City
Hat1	Stanboroughbury Farm, north and west of Hatfield
Hat2	West of Hatfield
Hat3	West of Ellenbrook, Hatfield
Hat4	South and west of Ellenbrook
Hat5	West of junction 3 of the A1(M), Hatfield
Hat11	South of Hatfield
Hat12	Nast Hyde Farm, Ellenbrook, Hatfield
Hat15	Symondshyde Farm
WeG12	Land at Pooleys Lane , Welham Green
WeG15	Potterells Farm
	Land at Bell Bar North East of Brookmans Park

Five sites were identified where a stronger Green Belt boundary existed just beyond their boundaries – see Table 5.

Table 5 – sites where stronger Green Belt boundaries existed just beyond their boundaries

Site reference	Location
Wel4	Sandyhurst, Welwyn By-Pass Road, Welwyn
Wel5	Reserve School Site, Tudor Road, Welwyn
GTLAA03	The Willows, Marshmoor Lane, Welham Green
WeG4a	Land at Marshmoor, off Great North Road
WeG4b	Land at Marshmoor, off Great North Road

Conclusions and next steps

The findings of the Stage 2 Review and Addendum generally accord with the overall conclusions of the Strategic Review. It is clear that the Green Belt in Welwyn Hatfield continues to play an important role against the national purposes and the local purpose.

The council will have to take a number of steps in determining which, if any, areas of land would be best to release from the Green Belt. In this context, it needs to be borne in mind that, of the 10,200ha of Green Belt land in Welwyn Hatfield, Part 2 (including this addendum) only considers 929ha, which is about 9.1% of the total. Whilst the results of this review are generally consistent with the Strategic Review by focusing on sites that are much smaller in area than the strategic parcels, this Stage 2 Review has resulted in assessments that have a much wider range of results.

Boundaries

Paragraph 85 of the NPPF indicates the need to retain strong Green Belt boundaries, assisting in defining a permanent and appropriate boundary between the developed area and the countryside beyond. If it is decided that exceptional circumstances exist for altering the Green Belt consideration will need to be given to defining clear strong boundaries wherever possible using physical features that are readily recognisable and likely to be permanent.

Strong boundaries are those that are expected to remain permanent over the long term, foreseeable future and are extremely difficult to alter or destroy by physical means or by planning decision, for instance by planning consent or planning decision at appeal. Examples of strong boundaries include motorways or railways. Weaker boundaries are those that are visible but can more easily be altered or destroyed by physical means.

A separate assessment has therefore has been made of whether the new boundary resulting from the release of a site from the Green Belt will be as good as the existing one or better which has taken account of the recommendations from the Stage 2 Review which recommended that following be considered:

1. How penetrable the boundary is by development.

2. Does the boundary feature type indicate whether it is strong or weak?

3. Establish consistency of boundary.

4. Make an assessment between the two to assess if new boundary is stronger.

5. How long term is the boundary, can it be maintained beyond the plan period?

The results of the boundary assessment are reported in the Housing and Employment Site Selection Background Papers