

Welwyn Hatfield Local Plan (2013-2032)
Public Examination
Inspector: Melvyn Middleton BA(Econ) DipTP DipMgmt

Louise St John Howe
Programme Officer
PO Services, PO Box 10965,
Sudbury, Suffolk CO10 3BFY
email: louise@poservices.co.uk
Tel: 07789-486419

24 October 2018

Mr. Colin Haigh,
Head of Planning,
Welwyn Hatfield Borough Council

By email only

Dear Mr. Haigh,

Welwyn Hatfield Local Plan
Green Belt Study and Next Steps

Further to your letter of 20 September 2018, seeking my advice on alternative ways forward for reaching a sound conclusion to the Local Plan examination and preferably at an early date. Much of what you write about concerns matters of process. These are really decisions for yourself and your Council rather than for me. However, like yourselves, I am anxious to achieve an early conclusion to the examination, whilst at the same time being able to confidently recommend a sound plan. I will therefore endeavour to give you my opinions, on the different ways forward, based on my past experience but on the understanding that it is not my function to tell you how to prepare the plan, only to indicate to you what aspects of it are not sound and why. Before that there are some points about the conclusion of the Green Belt study and its use in determining the way forward that I should make.

The consultation on the Green Belt study has produced around 50 representations, mostly criticising various aspects of it. I am to examine these in the week of 5 November. There is no established set methodology for reviewing Green Belts so that providing the assessment is robust and objective and it stands up well to criticisms at the Hearing, then I am unlikely to be seeking major changes to it. However a number of valid points concerning the methodology appear to have been made and if they stand up to scrutiny at the Hearing, I hope that you will take them on board when assessing the representations yourselves and taking the study forward. Additionally, I have noticed numerous objections to the assessments of particular areas of land. Whilst some of these may be

partisan, not all appear to be and having heard the evidence, I may well ask you to undertake a reality check of the alleged inconsistencies.

At some point, early in the process of moving the plan forward, your Council needs to determine what its approach to the Green Belt is going to be. What weights are to be given to the study's findings? Has the study revealed areas that should not be developed at any cost? Should the areas whose contribution to Green Belt purposes is low be removed? etc. Not all of the land has been classified the same in the context of being necessary to fulfil the Green Belt's purposes so that there may be scope to accommodate the plan's current development requirements and more. Whilst you could comprehensively alter the Green Belt boundaries in the context of paragraph 83 of the original Framework, it may well be simpler and easier to consider the evidence on a site by site basis and input the Green Belt considerations into a revised sustainability appraisal.

If you do decide to comprehensively move the boundaries, then you will need to be conscious of paragraphs 83-85 of the original Framework which, like the revised version, points to the intended permanence of Green Belt boundaries in the long term and their endurance beyond the plan period. I note that some of the proposed development sites are considered to be more harmful to the Green Belt than some land that is not proposed for development. Assuming that a reality check does not change their status, then very exceptional circumstances will need to be advanced before their allocation could be found sound if comparable or lesser sites that are not currently allocated, are retained in the Green Belt.

There appears to be a desire on the part of your Council to protect the existing settlement pattern. I take this to mean that it wishes to protect some or all of the open breaks between settlements in the Green Belt. Again these ought to be defined independently of any consideration of development sites adjacent to these villages. How they are defined, i.e. as Green Belt or as Green Breaks/Wedges (as in much of the country), is a basis for debate in itself. However, the protection of the settlement pattern is not a statutory purpose of the Green Belt and this analysis should be kept totally separate from any findings about the future of the Green Belt, even if for convenience you decide to retain Green Belt designation, for all such land, regardless of its actual contribution to the Green Belt itself.

Turning to your scenarios; there is merit in all of them and providing the end product is a sound plan then the one that reaches a conclusion in the shortest period of time is clearly the one to be favoured. However, whichever scenario is chosen it must lead to the production of a fully sound plan.

If there is evidence to justify increasing the residential density on some of the sites without prejudicing other matters of importance, such as the Garden City principles, then whichever scenario is followed, that course of action should be followed as it would be making the best use of land.

At some point you will need to examine whether or not your development strategy for this plan period can be accommodated within the land area that is potentially suitable for release from the Green Belt at this point in time. If it cannot then the development strategy would require modification and a policy-on housing requirement established that is less than your FOAHN.

The amount of employment land that you eventually allocate should be related to the accompanying housing proposals that you put forward. Providing the housing requirement that accompanies the employment growth strategy can be met within the land that can be released from the Green Belt, then the amount of new employment land allocated is effectively a political choice. If this is not possible then any aspirations for major employment growth would have to be curtailed.

A situation where employment growth outstrips housing growth, such that the net inflow of commuters into Welwyn/Hatfield increases would not be a sustainable outcome and would not be found sound.

Apart from the "call for sites" stage your first two scenarios would be very similar. I am not convinced that it need take as long as you suggest if the process is carefully programmed using critical path analysis from the outset, although I accept that the introduction of new sites would require further sustainability appraisal. The identification of broad areas for development, to accommodate some of the development needs beyond 10 years, would be Framework compliant providing that it was clearly demonstrated that there was sufficient land being released from the Green Belt to accommodate it and development beyond the plan period. This would not be as easy to undertake or justify as the release of individual sites to meet a specific identified need.

In either event there would need to be some consultation on any proposed new sites. It would be neater and safer as a separate exercise as Main Modifications consultation is not expected to generate surprises. Having said that, Main Modifications consultations that have included sites that have been previously independently consulted on, have been known to generate more objections than the prior consultation.

The third scenario, allocating only sites that have already been identified, would only be a way forward if the sites brought forward had clearly been assessed as the most sustainable and their harm to the Green Belt was comparable to other land that is being released from the Green Belt. I may be persuaded otherwise but in the context of the results of the Green Belt study and other than in the case of sites that have been previously developed or those that are well served by public transport, I cannot envisage a scenario where sites found to cause high harm to the Green Belt's purposes could be released because of exceptional circumstances, whilst sites that would cause a low level of harm were retained in the Green Belt and not put forward for development. Such a scenario would be unlikely to be found sound.

I trust that the above is sufficient to allow you to progress matters with your members. If you require further clarification then please come back to me. Also your letter implies that you envisage a discussion at the forthcoming hearing into the balance between protecting the Green Belt and meeting the District's development needs. I will make arrangements for that to happen.

Yours sincerely

M Middleton

Melvyn Middleton

INSPECTOR