

EXCEPTIONAL CIRCUMSTANCES FOR ALTERATION OF GREEN BELT BOUNDARY TO THE SOUTH OF HATFIELD

DECEMBER 2018

1.0 Purpose of Note

1.1 Paragraph 83 of the National Planning Policy Framework (2012 version of the NPPF referred to due to the submission of the draft Local Plan before the 24th January 2019) states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

1.2 This Note provides a summary of the exceptional circumstances that, in combination, exist for the release of Green Belt to the south of Hatfield as part of WHBC's emerging Local Plan. In summary, these are as follows:

- 1) Housing need;
- 2) Education provision;
- 3) Sustainability and infrastructure; and
- 4) Limited harm to the Green Belt and the provision of a new defensible boundary.

2.0 Housing Need

2.1 Within the Welwyn Hatfield Green Belt Study Stage 3 document prepared by LUC, it is confirmed that Welwyn Hatfield Borough Council's (WHBC) proposed Local Plan will be 3,200 homes short of meeting its calculated objectively assessed housing need (4,000 if the need for housing is extended to 2033). The Council has explored whether any additional options could be considered for reducing the housing shortfall against the objectively assessed housing need.

2.2 At the end of the Stage 2 Hearing Sessions in October 2017, the Inspector identified a need for further work in relation to the Green Belt, to assess which parts of the Borough's Green Belt are 'critical' to retain. The Council has made the case that there are exceptional circumstances for limited alterations to the Green Belt to address the housing shortfall. The LUC report confirms that the proposed releases in the draft Local Plan would reduce the coverage in the Green Belt in the Borough from 79.1% to 75.4% (a 3.7% reduction).

2.3 The lack of brownfield sites and non-Green Belt land within the Borough, together with the acute housing shortage, is considered to comprise an exceptional circumstance to justify the removal of land from the Green Belt to the south of Hatfield. The provision of 120 new homes within the draft allocation at HS11, to the south of Hatfield, would make a significant contribution to the housing shortfall, whilst also providing a new defensible Green Belt boundary along the ridgeline, as discussed in more detail.

- 2.4 The new homes can be delivered in the short term within the first five years of the Plan. The land is within single ownership and there are no issues with regards to land assembly or agricultural tenancies that would prevent housing coming forward.

Housing Distribution

- 2.5 The Council's Spatial Vision sets out that Welwyn Garden City and Hatfield will continue to be the main focus for shopping, leisure, housing and employment opportunities, where 12,000 new homes will be built on a range of sites, two thirds of which will be within and adjoining Welwyn Garden City and Hatfield. As outlined above, this figure could increase up to 16,000 new homes.
- 2.6 Other than the draft allocation at HS11, there are no other new homes to be provided to the south of Hatfield. The 120 new homes to the south of Hatfield, as provided by HS11, are therefore particularly important to meet the housing needs in this area of the Borough.

3.0 Education Provision

- 3.1 In addition to the provision of new homes, the draft allocation at HS11 includes land for a new two form entry (2FE) Primary School, including extensive playing fields. This is a facility of significant importance and will not only serve the future residents of the new homes at HS11, but also existing residents in south Hatfield and the wider catchment area.
- 3.2 Within the Regulation 19 representation to the draft Local Plan submitted by Hertfordshire County Council (HCC), the County Council objected to the Plan "... *on the grounds that sufficient provision is not being made to address primary education needs in Hatfield*". A Statement of Common Ground was therefore signed by WHBC, HCC, the land owner and promoter in January 2018, in which it was agreed that it was necessary to include land for a 2FE Primary School at the HS11 site to meet existing education needs in south Hatfield and to support wider growth in the Local Plan. It was also agreed that there are no other available sites in the right places to meet the educational needs arising from the Local Plan in south Hatfield, and therefore the Plan should be amended to include reference to a potential Primary School at HS11.
- 3.3 With this in mind, the requirement for a new 2FE Primary School in the draft allocation at HS11 is considered to contribute to there being exceptional circumstances to justify the removal of land from the Green Belt to the south of Hatfield.

4.0 Sustainability and Infrastructure

- 4.1 The lack of available brownfield and non-Green Belt land within the Borough gives rise to inherent difficulty in achieving sustainable development in the Borough without impinging on the Green Belt. When assessing sites for release from the Green Belt, it is important that the allocation process considers sites within highly sustainable locations. Indeed, Paragraph 84 of the NPPF states that when drawing up or reviewing Green Belt

boundaries, local planning authorities should take account of the need to promote sustainable patterns of development.

- 4.2 The land forming the draft allocation at HS11 is located within a highly sustainable location to the south of the large town of Hatfield. The site is within walking/cycling distance from a range of facilities within Hatfield, with the bus connection on South Way providing links to facilities further afield within Hatfield and other higher order settlements such as Luton and Welwyn Garden City.
- 4.3 The bus also provides a direct connection to Hatfield main line train station, which provides regular services to London, Cambridge and Welwyn Garden City. The Angerland Park and Ride to the west of HS11 provides an additional option for sustainable transport.
- 4.4 In addition to the above modes of transport, the draft allocation at HS11 is within very close proximity to the South Way/A1 junction, which is a key piece of infrastructure that provides connections to the M25 and settlements such as Borehamwood and Potters Bar to the south, and Welwyn Garden City to the north. The draft allocation at HS11 therefore does not require significant new infrastructure to facilitate the development of the site, which will assist with the delivery of the proposed new homes and Primary School.
- 4.5 The draft allocation at HS11 will provide new green infrastructure that will assist in the connection of areas such as Bunchleys Village Green to the east and the Cemetery to the west via the enhanced ridgeline. The proposals for the site also include areas of open space that will provide for high standards of public realm to the south of Hatfield, which will also connect to the ridgeline via existing rights of way that cross the site.
- 4.6 The highly sustainable location and existing/proposed infrastructure in the local area are considered to contribute to there being exceptional circumstances to justify the removal of land from the Green Belt to the south of Hatfield.

5.0 Nature and extent of harm to Green Belt and the provision of a new defensible boundary

- 5.1 Whilst the draft allocation at HS11 would result in the removal of land from the Green Belt, it is important to consider the nature and extent of harm that would result to the Green Belt and possible measures to mitigate this. For example, the draft allocation will provide for a new defensible Green Belt boundary in this location to protect the residual Green Belt and ensure the strategic purposes of the Green Belt remain unharmed.
- 5.2 The entirety of the draft allocation at HS11 is located beneath the ridgeline to the south of Hatfield. In the assessment of Parcel 56a, which relates to the release of the draft allocation at HS11, the Green Belt Study Stage 3 confirms that “... *harm would be lessened slightly by confining development to lower ground on the northern edge of the parcel where it would have less impact on settlement separation. The well-defined boundaries, non-rural use and extent of separation from Welham Green of the cemetery and park and ride that their inclusion in any release would not increase harm further*”.

- 5.3 The area of the Green Belt parcel in which the draft allocation at HS11 is located does not contribute to maintaining the visual perception of the gap between Hatfield and Welham Green, where inter-visibility is instead prevented by topography and vegetation.
- 5.4 The existing Green Belt boundary comprises South Way to the south of Hatfield. However, this has been breached by a number of land uses, including the Park and Ride, Cemetery (and possible extension), the former Southfield School and Barnfield Library. Furthermore, beyond HS11 to the south towards Welham Green are a number of parcels of land identified as areas of 'absolute constraint', including Wildlife Sites and Ancient Woodland.
- 5.5 Providing for a new Green Belt boundary along the ridgeline to the south of HS11 is therefore logical, as it would connect a number of these existing land uses, whilst preventing the encroachment of future development into the Green Belt, which the areas of absolute constraint would prevent in any instance. The draft allocation at HS11 would be constrained to lower ground and would not be perceptible to wider views, by virtue of the ridgeline being at a higher level and the new landscape planting that would be implemented along this route, as detailed within the 'Green Belt Boundaries Review' report prepared by James Blake Associates. The lack of harm to the Green Belt and the provision of a new defensible Green Belt boundary are considered to contribute to there being exceptional circumstances to justify the removal of land from the Green Belt to the south of Hatfield.

6.0 Conclusion

- 6.1 As outlined above, Paragraph 83 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period.
- 6.2 Further to this, Paragraph 84 of the NPPF states that when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Section Four of this Note sets out why the land to the south of Hatfield is located within a highly sustainable location, well connected to the surrounding area and is therefore suitable for residential development.
- 6.3 The acute housing shortage, the provision of land for a new 2FE Primary School, the highly sustainable location of the draft allocation, the lack of harm to the Green Belt and the provision of a new defensible boundary together comprise exceptional circumstances to justify the removal of land from the Green Belt to the south of Hatfield. The new defensible Green Belt boundary to the south of HS11 will protect the residual Green Belt and ensure the strategic purposes of the Green Belt remain unharmed to endure beyond the Plan period.