

**WELWYN HATFIELD LOCAL PLAN EXAMINATION:
FURTHER DOCUMENTS CONSULTATION: OCTOBER 2019**

Representations of CPRE Hertfordshire

GREEN GAP ASSESSMENT FINAL DRAFT REPORT (DOCUMENTS EX160/160A/160B).

1. Campaign to Protect Rural England, Hertfordshire (CPREH) wishes to make representations on the above documents because of their relevance to decisions on the scale of proposed housing provision, and the location of future housing development in the Welwyn Hatfield Local Plan. A similar document is being submitted in respect of the Landscape Sensitivity Assessment (EX156).
2. These representations respond to the Programme Officer's email of 6 October 2019 inviting representors to comment on Examination Documents EX154 to EX160.
3. At the time of preparation of these representations the Council had yet to decide on whether it wishes to propose any changes to the housing allocations in the submitted Plan, or propose any consequential changes to Green Belt boundaries, in the light of further studies and new information, and the Inspector's comments at the earlier stages of his examination, and his further letter to the Council dated 8 August 2019.
4. The Council has now stated (EX162) that any such proposals are not likely to be agreed by them until January 2020 for consideration at further examination hearings in February 2020. CPREH has previously stated a wish to participate at such future hearings in the Inspector's examination in terms of any significant changes that affect the Green Belt.
5. The aspects of soundness that are addressed by the new representations below are:
 - 1) whether the new Green Gap Assessment (GGA), together with the Landscape Sensitivity Assessment (LSA) and previously published documents, constitute sufficient evidence to justify the scale of development, including development in the Green Belt, proposed in the submitted Plan, and
 - 2) whether those documents provide sufficient evidence to justify the major housing allocations in the submitted Plan.
6. Given the importance of the requirement for the Council to demonstrate exceptional circumstances to justify the scale and location of all development allocations proposed in the Green Belt, any further proposals by the Council will also have to be scrutinised in

2020. CPREH wishes to be given an opportunity to make representations on any such proposals before they are examined by the Inspector.

7. The GGA enables areas to be identified that would be harmed by development that may not have been revealed by reliance solely on the Green Belt Review (GBR) (EX99). CPREH has sought to identify those areas of land proposed for major housing development in the Plan or are now threatened as a result of the wish to consider potential major new housing sites, where the weight of evidence is now that they should not be developed as a result of the GGA research.
8. CPREH has also looked at the areas already proposed for major development in the Plan, and the pattern of harm that would arise from the overall scale of development proposed in the Plan when the research for the LSA and the GGA are compared with the GBR studies, to see if the overall amount of proposed development in the current Green Belt is justified.

Findings of the GGA

9. The most helpful result of the GGA is the identification of areas between settlements that the Council's consultants consider should be subject to limitations on any future development and these are shown on Figure 4.1. These areas are listed in a recommended Policy on page 135. The GGA states that these areas should not necessarily prevent all development, only development which would compromise the relevant gap.
10. CPREH believes that the above results show that any major new housing allocation, or any such already proposed allocation in any of the gaps listed would indeed compromise the relevant gap, and that in many cases even modest or small scale developments would compromise those gaps.
11. These conclusions are reached even overlooking the methodological flaws in the GGA.
12. A major specific flaw of the study in terms of the scope of the Assessment, is the failure to even assess the gap between Hatfield and Stanborough, even though reference to its significance is included in the Landscape Sensitivity Assessment (EX156, page 58). This is extraordinary, given that the Green Belt Review (EX99) identified this gap as a strategic 'fragile gap' in the Borough, in figure 4.1. Furthermore, the conclusion on the

gap between Symondshyde and Hatfield (page 115 of the GGA) highlights the aim of minimising inter-visibility between one settlement edge and the other, taking into account loss of the screening effect of trees for half the year, yet this is not even investigated for the much smaller and highly sensitive gap between Hatfield and Stanborough despite this strategic importance.

13. CPREH consider this to be a serious flaw, possibly influenced by the proposal in the submitted Plan for all of this gap between Hatfield and Stanborough to be included in the NW Hatfield Housing Allocation, despite the strategic importance of the gap and its proximity to Welwyn Garden City just to the east on the opposite side of the A1(M) motorway.
14. Perhaps the most important overall flaw in the study is the failure to look at the actual settlement boundaries of the towns and villages covered, rather than existing policy area boundaries. For example there are some developed areas that would be deemed previously-developed, that are not included within the boundaries of settlements they are in reality part of (most noticeably west of Cuffley and at Mardley Heath and Oaklands) that are larger than some of the potential inset villages currently washed over by Green Belt.
15. The consequence of this is that many gaps assessed by the GGA are actually smaller than revealed by the GGA, particularly in visual terms, and the impact of major development within them would be consequently greater.
16. CPREH therefore considers that the impact of development on the gaps eastward between the settlements from Potters Bar to Cuffley and Goffs Oak in Broxbourne; northwards along the A1000 corridor from Potters Bar to Hatfield: around Stanborough and Lemsford; and north of Welwyn Garden City as far as Knebworth in North Hertfordshire would all be greater than stated in the GGA.

Implications of the GGA, LSA and Green Belt Review

17. When Figure 4.1 of the GGA, 'Proposed gaps policy areas'; Figure 3.1 of the LSA 'Landscape Character Area Sensitivity'; and Figure 7.1 of the Green Belt Review 'Assessment of Potential Harm', are compared, the following implications are clear to CPREH:

- 1) There are no new areas that could be allocated for major housing development in sustainable locations without significant harm to either the landscape, an important gap between existing settlements, or a combination of Green Belt purposes, in addition to the in-principle national Green Belt policy constraints set out in NPPF 2012, to which the Plan is still subject;
- 2) Most of the areas where the greatest harm would be caused to the Green Belt by new development are also areas of greatest landscape sensitivity or comprise an important gap between settlements, or both, and these include areas currently proposed for housing development in the submitted Plan;
- 3) The Plan should be modified to remove or reduce the proposed housing site allocations now shown to be likely to have an unjustified adverse impact on the Borough's countryside and to therefore be unsound; and
- 4) The overall housing requirement set out in the submitted Plan should be reduced to reflect the removal and/or reduction in area of the major housing allocations and the reduced scale of development that is consistent with the need to demonstrate exceptional circumstances for the removal of land from the Green Belt.