

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

Representations of CPRE Hertfordshire

LANDSCAPE SENSITIVITY ASSESSMENT (DOCUMENT EX156).

1. Campaign to Protect Rural England, Hertfordshire (CPREH) wishes to make representations on the above document because of its 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 Green Gap Assessment (EX160)
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, and 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 Landscape Sensitivity Assessment (LSA), together with the new Green Gap Assessment (GGA) 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 LSA is helpful in addressing for the first time the sensitivity of parcels of land across the Borough to landscape change as a result of major development. Unfortunately, and necessarily because of the different methodologies, the areas chosen for study do not align with the parcels of land chosen for assessment in the Green Belt studies, including the most recent Green Belt Review (GBR) (EX99). The LSA does however enable areas to be identified that would be harmed by development that may not have been revealed by reliance solely on the GBR. CPREH has sought to interpret the findings in order to identify those areas of land where the weight of evidence is now that they should not be developed as a result of the LSA research such that the overall amount of proposed development in the current Green Belt is unjustified.
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.

Findings of the LSA

9. Figure 3.1 on page 19 of the LSA reveals the extent of the Borough's countryside that is subject to what are described as absolute constraints which should prevent development and where the sensitivity to new development is more than moderate. The vast majority of the countryside is within those categories with only a relatively small numbers of areas or subdivisions of them of low or moderate sensitivity.
10. When the individual character area assessments are looked at in more detail however, it is apparent that there are parts of areas categorised as of low to moderate sensitivity that are of significant sensitivity for at least one of the criteria applied in the research. As stated at paragraph 2.20, one criterion alone may be sufficient to result in a judgement of high sensitivity. An example of this is the area (31a in the LSA) between Hatfield and Stanborough (currently a washed over Green Belt settlement) which is described as having a high sensitivity to development because of its high visibility and very open character, yet is only categorised as part of a wider area of lower sensitivity. This is despite the assessment noting (page 58) that '...there is some sensitivity associated with the area's role in preserving distinction between Hatfield and Stanborough, and in the

open access provision to the west of the Garden Village.’ This particular area is also relevant to the findings of GGA and the GBR that are referred to in our separate representation on the GGA.

11. The areas of significant sensitivity revealed by the LSA also include several areas currently proposed for major development in the Plan, including the NW Hatfield allocation that includes the area referred to above, but also the area (29c) west of Brookmans Park, and half of the proposed Symondshyde new settlement allocation (area 32).
12. CPREH considers that the research set out in the LSA demonstrates that there is very limited opportunity to increase the scale of housing development in the Green Belt based solely on the results of the Assessment without causing significant additional harm to the Borough’s landscape, and that consideration should be given to removal of areas of land from the allocations in the submitted Plan which are now shown to be of more than moderate sensitivity, including at Brookmans Park, North West Hatfield and Symondshyde, in order to make the Plan sound.
13. As a consequence CPREH considers that the overall scale of housing development proposed in the submitted Plan is not justified.
14. The collective implications of the LSA, GGA and the GBR are addressed in our statement on the GGA.