

North Mymms District Green Belt Society

November 2019

GREEN GAP ASSESSMENT

Report by LUC for Welwyn Hatfield Borough Council

Published August 2019

Comments by Jed Griffiths on behalf of North Mymms District Green Belt Society

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the North Mymms District Green Belt Society. It has been compiled in response to the Green Gap Assessment Report, prepared by LUC consultants for Welwyn Hatfield Borough Council, and published in August 2019. The report and its appendices form part of the evidence base for the Local Plan Examination, and have been placed on the examination web-site as documents EX160, EX160A, and EX160B. In compiling this statement, regard has also been paid to the Landscape Sensitivity Assessment report (EX156), the results of which are shown on the maps in Appendix 1.

Context

2. The Society generally welcomes the publication of the report, in that it will make a valuable contribution to the debate at the examination of the Local Plan. During the earlier stages of the examination, the Society have emphasised the role of the Green Belt in separating settlements from each other. Although one of the stated aims of the Green Belt is to prevent the merger of towns, in Welwyn Hatfield, the “green gaps” have served also to protect the identity of villages. The Society strongly agrees with the view in paragraph 1.6 of the report, about the role of the Green Belt in the adopted District Plan, which has helped to maintain the existing settlement pattern.
3. As noted in paragraph 1.7 of the report, the Examination Inspector has questioned the role of the Green Belt in performing this “local purpose”. The Inspector’s suggestion of specific policy designations to provide protection for the gaps between settlements is supported as one of the main aims of the study. The list of the relevant settlements, shown on Figure 1.1, is noted, although the Society questions the inclusion of the “villages potentially to be inset from the Green Belt”. These include Bell Bar and Swanley Bar, which, in the view of the Society, should continue to be “washed over” by the Green Belt.

Methodology

4. The methodology for the study, set out in Chapter 2 of the report, is generally sound and comprehensive. With the exception of the “potential inset” villages, the candidate areas for assessment are supported. The stepped approach to the assessment of each candidate area is robust. Inclusion of the ratings from the Landscape Sensitivity Assessment and the analyses of gap values and opportunities give added value to the process. The summaries and recommendations for each area complete the picture. The Society’s comments on each of the assessments are set out below.

Settlement Gap Assessments

Hatfield and Welham Green

5. The importance of this area has been stressed in previous submissions by the Society. The A1001 road marks a very strong boundary between Hatfield and the countryside. There is a clear acknowledgement in the analysis of its sensitivity in landscape terms, and its vulnerability to development pressures. Reference is made to the number of areas promoted in response to the Borough Council's Call for Sites exercise. The Society has already expressed its concerns about these proposals in its earlier comments.
6. The recommendations are generally supported by the Society, in particular that this should be a "gap policy area." The boundaries of the proposed designation are also endorsed including the area on the western edge of Welham Green. In the view of the Society, however, the Marshmoor area, to the east of the village, should also be included in the "gap policy area." In the analysis section of the assessment, there is reference to the perception of the gap, when travelling along the A1000 at Marshmoor. The Society has argued in its previous representations that Marshmoor performs an important Green Belt function in the separation of Welham Green from the environs of Hatfield. This should have been recognised in the report. Further comment is made about the role of the Marshmoor area in the conclusions to this statement (see paragraph 18 below).

Welham Green and Brookmans Park

7. The analysis contained in the report recognises the characteristics of this gap, and its landscape sensitivities. Its importance has been acknowledged in the earlier Green Belt Study and by the Society in representations made to the examination. Potential designation as a "gap policy area" is strongly supported. The area suggested on map 2, however, should embrace the area to the south west of Welham Green, including Potterells Farm. In landscape terms, this would make sense, because it would be consistent with the suggested boundary of the gap to the west of the village.
8. Potterells Farm was rejected as a possible housing site in the submitted Local Plan, but has been re-promoted in the recent call for sites. The Society has consistently registered its strong objections to the development of Potterells Farm and other sites to the south west of the village. In the Green Belt Study, these areas were assessed as "high" or "very high". They should not be excluded from the "gap policy area."

Bell Bar and Brookmans Park

9. In its previous submissions to the examination, the Society has objected to the potential exclusion of Bell Bar from the Green Belt. The description in the assessment of Bell Bar as a village is erroneous. In essence it is a hamlet, with a haphazard pattern of development along the A1000 Great North Road. The Society rejects the statement in the assessment that Bell Bar is joined to Brookmans Park. It may appear to do from the map, but there is no connecting road or footpath between the two settlements. Indeed, there is a distinct visual gap between Uplands Drive and the cross-roads at Swan Lodge on the A1000. The assessment and its conclusions serve to reinforce the Society's views about the dangers of coalescence and ribbon development along this route corridor. (see paragraph 18 below)

10. The Society has noted the comprehensive assessments of landscape sensitivity and the analysis of the ecological, cultural heritage, and habitat networks. It is clear from the commentary and the summary, however, that the important issue is not the "gap" between Bell Bar and Brookmans Park. Rather, it is the sensitivity of the setting to the north of Brookmans Park, and the potential impact of development on the Green Belt in that sector. This is clearly expressed in the final part of the summary. For the reasons stated above, the Society would argue that this section should have been removed altogether from the Green Gap Assessment.

Brookmans Park, Swanley Bar, and Little Heath

11. In its previous submissions, the Society has objected to the potential removal of Swanley Bar from the Green Belt. As described in the report, it is a small nucleated settlement, and has none of the range of facilities and services which would justify its exclusion. This part of the assessment should be concerned therefore only with the gap between Brookmans Park and Little Heath. The sub-division of the analysis between Brookmans Park and Swanley Bar, and Swanley Bar and Little Heath, is unnecessary and distorts the overall assessment. Little Heath itself is a specified settlement in the Welwyn Hatfield District Plan. It is a distinctive community – it is not, as described in the report, a suburb of Potters Bar.

12. The Society agrees that there should be a “gap policy area” to the south of Brookmans Park, but that it should extend to the Borough boundary with Hertsmere. It should extend to the East Coast main railway in the west; in the east to the A1000 road, including the area between Swanley Bay Lane and Little Heath. The part of the assessment which refers to the gap between Swanley Bar and Little Heath should be removed from the report.
13. It is important that the “gap policy area” should be extended to the south of Hawkshead Lane, which is part of Landscape Character Sub-area 54c. In the assessment, its sensitivity is described as “moderate-high”, due to the elevated landform and visual openness. This description is equally applicable to the area to the south of the Lane, and it should therefore be considered as part of the gap.
14. The Inspector has been made aware of the recent consultation on the review of the Hertsmere Local Plan, which includes the option of possible housing development on the northern edge of Potters Bar. The Society has expressed its concerns about this and the potential impact on the Green Belt. The threat of development at Potters Bar reinforces the need to extend the “gap policy area” as described above. The Society believes that the consultants should have been asked to assess the whole of the gap between Brookmans Park and Potters Bar, including Swanley Bar and Little Heath. It was a mistake not to do so.

Little Heath and Northaw

15. At 1.3 Km, this is a very wide gap, and it is questionable as to whether it should have been assessed in the study. It would appear that it has only been included for the sake of completeness, as Northaw is one of the villages “potentially to be inset from the Green Belt.” In the view of the Society, even if Northaw were to be removed from the Green Belt, the gap between the two settlements is sufficiently wide to be covered by other policies. There is no need for it to be covered by a “gap policy area” in the Local Plan. The small part to the west of the A1000 should be included in the “gap policy area” between Brookmans Park and Little Heath (see above).

Summary and Conclusions

16. The Society generally welcomes the publication of the report, as it provides an additional layer of evidence for the final stages of the Examination Hearings. In the comments set out above in this statement, the Society does have some reservations about some of the conclusions and recommendations. Nevertheless, the methodology is robust and gives a thorough analysis of the important gaps between the settlements.

17. In its conclusions and recommendations, the study reinforces the view of the Society about the vital role, in Green Belt terms, of the gaps between the settlements in the A1 corridor. Arguably, these are the key elements of Green Belt policy in the Borough.

18. There is one aspect that the Green Gap Assessment does not cover, which is of considerable concern to the Society. This is the major issue, raised in the response to the Call for Sites consultation, about the real danger of ribbon development along the route of the A1000 Great North Road. This point is only partially addressed in the report, but will be covered in more detail by the Society in further representations at Stage 7 of the Hearings.

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1st November 2019