



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
Bayard Developments Ltd
Wattsdown Developments Ltd

Submissions regarding Examination Document EX223
Inspectors' Invitation of Comments on Treatment of Green Belt Boundaries
Welwyn Hatfield Borough Council Local Plan Examination Stage 9 Hearings – Session 51

Fulling Mill Lane, Welwyn Wel1, Wel2. Wel 15
Land at London Road, Knebworth WGr3

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1.0 INTRODUCTION

- 1.1 This report is a response to the Inspector's invitation for additional comments in response to Examination Document EX223 (Green Belt Boundaries) and is submitted on behalf of Bayard Developments Ltd and Wattsdown Developments Ltd.
- 1.2 In accordance with the Inspector's invitation the comments in this report address EX223 in the context of the potential revisions to the policies and proposals and the evidence on which the revisions are based.
- 1.3 These comments should be read alongside representations to the Council's 2020 'Additional Sites' Consultation (specifically paragraph 5.2 (Stage 3 Green Belt Review and Site Selection) and site-specific representations on the consultation proposals).
- 1.4 The Council's position on the evidence and justification for Green Belt release remains confusing. The Plan proposes the release of some sites that cause "moderate/high" harm but states that other sites similarly categorised should simply not be considered. Furthermore, it would appear that to justify the sites being proposed for Green Belt release considerably more both off and on-site mitigation is required to minimise the impact. There is no evidence before the Examination to suggest that the impact of similar measures was considered prior to discounting other sites that represented reasonable alternatives to those sites being promoted for release.
- 1.5 The Council's position regarding Green Belt boundaries in EX223 appears to be a retrospective attempt to introduce provision for mitigation. This is a flawed approach in the context of a plan where a significant requirement for additional work has been identified, including as part of the Inspector's EX39 and in seeking to identify options that would meet housing needs in full and identify the most appropriate strategy for growth in accordance with the NPPF2012.
- 1.6 The Council's Officers have revisited the site selection process and the potential for exceptional circumstances to be demonstrated across a range of reasonable alternatives. This includes an assessment of the potential to identify clearly defined and permanent alternative Green Belt boundaries as part of the overall weighting exercise, including where mitigation may be provided. The outcome of the additional work illustrates that the sites selected for development are not those resulting in the lowest level of Green Belt harm, and that in many instances the original capacities for development were not justified.
- 1.7 This additional work highlights that there are other suitable and sustainable sites that would result in the same (or less) levels of Green Belt harm but that these have not been selected for development. This remains the case following details of additional sites the Council has chosen to submit in EX219/EX224.
- 1.8 Set in this context, the Council's proposed approach to Green Belt boundaries as summarised in EX223 is unsound. In-particular, the approach is not effective, not justified for site-specific proposals and is not consistent with national policy and guidance regarding how exceptional circumstances to justify the amendment of Green Belt boundaries are to be identified. This report addresses specific shortcomings with the proposed approach for specific sites, including where this:
 - Seeks to maximise capacity of selected sites for development by extending mitigation beyond the original site boundaries, contrary to the previous findings of the Examination and Site Selection process
 - Fails to recognise the relationship between requirements for mitigation, boundary definition and avoiding impacts on the wider Green Belt
 - Fails to recognise the overall level of harm associated with the release of specific

sites;

- Does not recognise that the potential for harm and contribution to Green Belt purposes may vary across a site or within a parcel, meaning that appropriate boundaries may need to be defined within the allocation site.
- Highlights that the site selection process has not been undertaken in a balanced way as far more weight has been given to the benefits of mitigation for selected sites than has been given to those which have not been selected.

2.0 SUMMARY OF EX223 – GREEN BELT BOUNDARIES

- 2.1 EX223 is presented as an aid to assist the interpretation of modifications proposed by the Council in relation to the definition of Green Belt boundaries, following the criterion set out in paragraph 85 of the NPPF2012 i.e., using physical features that are readily recognisable and likely to be permanent.
- 2.2 The Council's particular interpretation of this component of national policy is specifically in the context of outlining a proposed approach where *"the need for tree planting and green buffers to strengthen Green Belt boundaries"* has been identified.
- 2.3 EX235 (Main Modifications) identifies at least 8 specific instances that accord with the Council's proposed approach:
- MM/14/TBC – Table 9 HS2 (WGC1)
 - MM/15/TBC – Table 10 HS11 (Hat11)
 - MM/15/TBC – Table 11 HS15 (Wgr1)
 - MM/18//TBC – Table 13 HS20 (Wel3)
 - MM/20/TBC – Table 14 HS35 (GTLAA01)
 - MM/22/TBC – Table 16 HS25 (LHe1)
 - MM/23/TBC – Table 17 HS28 (Cuf6)
 - MM/23/TBC – SADM33 HS27 (Cuf1 Meadway)
- 2.4 The Council's proposed approach acknowledges that there will be exceptions, with potential examples set out on Page 1 of EX223. However, the Council's approach to modifications still presupposes that:
- 1) Mitigation to satisfy the criterion at the last bullet of NPPF2012 paragraph 85 can be applied and considered in isolation;
 - 2) That additional planting is an effective approach to mitigation in order to provide clearly defined physical features and permanent boundaries;
 - 3) That an appropriate starting point to satisfy the requirement for any mitigation required is to seek provision on land outside areas identified for release from the Green Belt and on land to be retained within this designation; and
 - 4) That the process of outlining an overall approach to providing additional mitigation to support the definition of Green Belt boundaries (where this is required) can be considered separately from the overall judgement regarding whether exceptional circumstances exist to support the amendment of Green Belt boundaries for each relevant proposed allocation i.e. there are locations which would not require this level of mitigation to be acceptable and locations where this level of mitigation would result in lesser harm.

3.0 THE CORRECT APPROACH TO DEFINING GREEN BELT BOUNDARIES AS PART OF THE IDENTIFICATION OF EXCEPTIONAL CIRCUMSTANCES

- 3.1 Taking all points together it is clear that the neither the Council's own evidence base or the correct approach to the application of national policy and guidance indicate that the proposed approach to mitigation is one that is justified, effective or consistent with national policy.
- 3.2 The NPPF is clear that it is to be applied as a whole. This applies in particular to the NPPF2012's provisions for Green Belt at paragraphs 79 to 92. By extension this means that the final bullet at paragraph 85 of the NPPF2012 (relating to permanent recognisable features) also cannot be applied in isolation.
- 3.3 In EX223 the Council also seeks to apply criteria (v) of the *Calverton*¹ tests in isolation – related to considering the extent to which consequent impacts on the purposes of the Green Belt harm can be ameliorated or reduced to the lowest reasonably practicable extent. This can not be applied on a site by site basis without fully considering all reasonable alternatives.
- 3.4 In respect of decisions regarding the release of Green Belt sites it is appropriate to note the judgment in the case of *Compton PC, Ockham PC & Cranwell v Guildford BC, SSHCLG & Ors* [2019] EWHC 3242 (Admin) which provides an important update in the understanding of exceptional circumstances as part of plan-making. The *Compton PC* judgment, which is referred to in the Council's own 2019 Site Selection Paper (paragraphs 6.1 – 6.8) emphasises at paragraph 72 that the factors that may affect whether exceptional circumstances are demonstrated cannot existing in a vacuum or by themselves. The nature and degree of need would be relevant to these considerations alongside the actual degree of ham to the Green Belt.
- 3.5 In relation to the *Calverton* tests paragraph 72 of the *Compton PC* judgment states:
“The analysis in Calverton PC of how the issue should be approached was described by Jay J as perhaps a counsel of perfection; but it is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable infrastructure.” (Paragraph 72, our emphasis)
- 3.6 It is clear that the NPPF2012 requires a similarly comprehensive approach to be taken.
- 3.7 All of the bullets within NPPF2012 paragraph 85 apply when establishing the correct approach to defining Green Belt boundaries, which warrant reading across with NPPF2012 paragraphs 83 and 84. This is necessary to ensure that the approach taken to defining boundaries in specific cases takes account of the overall conclusions on the potential for exceptional circumstances to be demonstrated, taking into account (for example) the strategy for meeting needs and consequences for sustainable development (NPPF2012 para 84 and NPPF2012 para 85 bullet 1) and whether it is necessary to keep land permanently open (NPPF2012 para 80 regarding Green Belt purposes and NPPF2012 para 85 bullet 2).
- 3.8 Paragraph 81 of the NPPF2012 seeks to enhance the use of land designated as Green Belt, once the extent of this designation is defined. Paragraph 81 refers to other qualities and opportunities (e.g., sport and recreation together with retaining and enhancing open space and visual amenity) that are relevant to enhancing beneficial use of the Green Belt, once boundaries have been defined.
- 3.9 On that basis it is clear that the Council's approach will not necessarily be sound in all cases, and that substantial tree planting beyond allocation boundaries will not necessarily best

¹ Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 (Admin)

address objectives in relation to recreation or visual amenity. The most recent PPG makes a similar point regarding measures that might address how the impact of removing land from the Green Belt can be offset. These measures are not limited only to woodland planting and could include (for example) enhanced recreation and playing field provision (PPG ID: 64-002-20190722).

- 3.10 Against the wider range of guidance, it is clear that the Council's proposed approach in EX223 is too narrowly defined and is only now being considered as a retrospective adjunct to the site selection process, which is fundamentally unsound.

4.0 RELATIONSHIP BETWEEN EX223 AND THE SITE SELECTION PROCESS

- 4.1 The Council's proposed approach in EX223 has principally been prepared to address the potential for modifications relating to sites identified in the 2016 Submission Draft Plan. Unsurprisingly it does not therefore sit comfortably with the outcomes of additional work that the Council has subsequently been required to undertake to address soundness concerns with the submission version of the Plan together with setting out options for how objectively assessed needs may be met in full.
- 4.2 The Council's Site Selection Background Paper (2019) considers the issue of Green Belt boundaries as part of the overall weighting to be applied to the site assessment process and the potential for exceptional circumstances to be demonstrated.
- 4.3 There are fundamental issues with the submission draft Local Plan and 'additional sites' presented by the Council in EX219/EX224 that demonstrate that the Council's overall approach fails to select sites generating the least impact on the Green Belt; fails to satisfy the Inspector's requirement for additional work in relation to providing an appropriate spatial strategy; and fails to address minimum full objectively assessed needs of 16,000 dwellings for the plan period 2016 to 2036. The Council's proposed approach in EX223 needs to be read in that context.
- 4.4 To reiterate the need for a comprehensive approach, **Table 9.2** of the 2019 Site Selection Background Paper confirms that weighting is applied based on the contribution to national Green Belt purposes. **Table 9.3** deals with the assessment of *potential harm* in terms of weighting to be applied. Separate weighting is also applied to the ability to provide enduring Green Belt boundaries. The conclusions on this part of the balancing exercise are clearly not limited simply to the potential for *substantial tree planting* and have wider regard to the characteristics of the existing boundary and whether new proposed boundaries would be weaker or could be strengthened in whole or in part. **Table 9.4** of the 2019 Site Selection Background Paper is extracted and shown below:

Table 1. Extract from the 2019 Site Selection Background Paper – Definition of Green Belt Boundaries

Table 9.4: Green Belt boundary weighting

Strength of boundaries	Weighting
New boundary would be stronger overall or in part than existing boundary and is clearly defined	Significant in favour
New boundary would be similar in strength to the existing boundary and is clearly defined	Moderate in favour
New boundary would be partially weaker than the existing boundary but is clearly defined	Minor in favour
New boundary would be partially weaker than the existing boundary and is not clearly defined	Minor against
New boundary would be predominantly weaker than the existing boundary but would be clearly defined	Moderate against
New boundary would be predominantly weaker than the existing boundary and would not be clearly defined	Significant against

- 4.5 In reaching these conclusions on the overall balance it is also imperative to note the indicative capacities for potential allocations feed into the Council's assessment.
- 4.6 The Council's EX223 appears to be predicated on the assumption that the proposed approach should not impact on development capacities, on the basis that additional planting and boundary definition will be provided outside of the allocation boundary, within the Green Belt. It is evidently not the case that this solution would be sound in all cases.

- 4.7 The Inspector's EX39 does state that the contribution of parts of some large sites or parcels may contribute more to preventing encroachment than the findings for a single site may suggest. It is not the case that all sites (or parts of sites) will have the same potential impact on the wider Green Belt. This will be affected by existing patterns of land use and topography, in many cases reflecting the relationship between different Green Belt parcels as a starting point for boundary definition.

5.0 IMPLICATIONS OF EX223 FOR SITE-SPECIFIC PROPOSALS AND POTENTIAL MODIFICATIONS

- 5.1 It is helpful to set out how the Council's proposed approach in EX223 (and the current position regarding suggested modifications) relates to findings of the 2019 Site Selection Background Paper regarding Table 9.4 (Green Belt boundaries).
- 5.2 Table 1 in **Appendix 1** to this Report compares findings for all sites where the Council suggests its proposed approach is appropriate (EX223 bullets on page 2) plus those sites where specific modifications are proposed regarding tree planting (including where exceptions must be made e.g., due to land ownership). Site SDS5 (Hat1) ('North West Hatfield') has also been added to this table as an example of where the Council indicates a different approach will be taken, but the approach to modifications is not yet defined.
- 5.3 The core issue with the Council's approach stems from the fact that, as confirmed by the Council's additional work, the range of sites proposed for allocation are not the most appropriate options in terms of limiting harm to the Green Belt and identifying opportunities to provide clearly defined amended Green Belt boundaries.
- 5.4 Sites which perform favourably in terms of a more limited contribution to Green Belt purposes, result in lower levels of harm and offer opportunities to identify clearly defined and permanent boundaries have remained excluded. This is evident from the comparable findings from the Stage 3 Site Assessment process, as set out in the 2019 Site Selection Background Paper, presented for our clients' sites at Welwyn and Woolmer Green.
- 5.5 Specific issues are set out below in terms of their relevance to the Council's suggested modifications.
- a) Ignoring Comparisons with the Strength/Weakness of Existing and Alternative Boundaries (including Defining Boundaries Using Existing Features)**
- 5.6 The SPRU comparison table in **Appendix 1** illustrates a number of instances where the Council's own evidence in the Site Selection Background Paper confirms that the process of attempting to define new Green Belt boundaries would result in a degree of adverse impact and weigh negatively in the weighting for whether exceptional circumstances are demonstrated.
- 5.7 This is particularly significant where new, lengthy boundaries are proposed that are not currently defined by any physical or land use features. The potential impact of new boundaries is exacerbated where changes in topography would add to the visual impact of new development. SPRU's representations to the 2020 Sites Consultation highlight that changes in landform are not an appropriate basis to define readily identifiable and permanent Green Belt boundaries. The adverse impacts identified in the Council's Site Selection Background Paper also identify instances where a reduction in fragile gaps between settlements would reduce the effectiveness of defining new boundaries.
- 5.8 It is for this reason that the Council's proposed approach on sites including **WGC1**, **LHe1** and **Hat1** ignore the moderate or minor weight applied in the Site Selection Background Paper against the ability to define alternative Green Belt boundaries. In such cases the retrospective requirements identified for further mitigation in the form of planting outside the allocation boundary would not necessarily ameliorate impacts to the lowest possible extent.
- 5.9 The type of mitigation proposed would not achieve the same relationship in terms of visual and spatial openness compared to existing boundaries and measures such as tree planting would, while not being inappropriate development, further serve to limit the actual and perceived gaps between settlements.
- 5.10 Such additional impact can be entirely avoided on our clients' sites at Welwyn

(Wel1/Wel2/Wel15) and Woolmer Green (WGr3). The ability to identify clearly defined and permanent alternative Green Belt boundaries exists without recourse to the Council's proposed approach in terms of additional tree planting.

- 5.11 As set out in the Council's own evidence in the Site Selection Background Paper for Wel1/Wel2/Wel15 this is principally as a result of the proposed redefined western boundary of parcel Wel1. Within the Council's Stage 3 Green Belt Assessment Parcel P7 (containing the three sites) is clearly distinguished from Parcel P41 to the west, which has a more significant relationship with the wider Green Belt.
- 5.12 The Site Selection Background Paper identifies that the redefined Green Belt Boundary comprising the western boundary of Wel1 (and the eastern boundary of the adjacent wider Green Belt parcel) would be clearly defined. The area currently comprises a field boundary/hedgerow (defined as weak to moderate). It is critical, however, to note the relatively narrow extent of this boundary combined with very little additional mitigation required to enhance the existing hedgerow. This would reinforce the ability to provide for a clearly defined boundary with very limited relationship or potential for impacts upon the wider Green Belt. The Council's evidence identifies **minor weight in favour** of alternative boundaries defined on these terms *without* the requirement for substantial additional planting as set out in EX223.
- 5.13 For WGr3 (Woolmer Green) it is key to note that the Council's Site Selection Background Paper notes the assessment of Parcel 3b, which would not extend any further south than the existing edge of built development in Knebworth. The detailed boundary assessment set out:
"that if parcel P3b is taken forward the impact would be greatly reduced, including on the Green Belt boundary. Development limited to 25 dwellings"
- 5.14 The comparison between existing and redefined boundaries must be set in the context that the settlement edge of Knebworth delimits the current extent of the Green Belt. The Site Selection Background Paper indicates that at an area of existing woodland planting would provide a *moderate* alternative boundary.
- 5.15 Firstly, it should be noted that this area of woodland is an existing feature; effective mitigation and certainty in boundary definition would be achieved without additional planting and the approach proposed by the Council in EX223.
- 5.16 However, we would respectfully argue that any alternative boundary would not only be clearly defined (as acknowledged by the Council) but also defensible and permanent. To support this view, it should be noted that the rail line comprising the western site boundary also provides a strong and clearly defined boundary feature as well as a strong visual interruption given that the railway runs on a significant embankment.
- 5.17 It is also the case, in accordance with the Council's assessment of Parcel 3b, that a layout of 25 units would provide additional areas for planting and landscaping between the edge of built development (contiguous with the built up development east of London Road) and the existing tree belt. For the reasons set out above (regarding the ability of existing features to provide a clearly defined boundary) this element would not be required to provide mitigation as per the Council's proposed approach in EX223.
- 5.18 If, however, this area was to be retained as Green Belt outside the area allocated for development it could provide for additional mitigation and compensatory measures in terms of opportunities for open space and recreation. This should be weighed favourably in the case for exceptional circumstances, whereas the form of mitigation as set out in the Council's proposed approach in EX223 appears strictly limited to seeking clearly defined and permanent boundaries.

b) Ignoring the Implications of Overall Harm to the Green Belt

- 5.19 Using proposed allocation **HS22** as an example it is clear that considerations regarding overall Green Belt harm and variation within parcels apply to identifying the most appropriate approach towards the definition of Green Belt boundaries and amelioration of potential impacts.
- 5.20 The site is a particularly relevant example due to the 'Very High' harm associated with the overall release of GB Parcel 65 and 'High' harm related to the proposed allocation boundary of **HS22/BrP4**.
- 5.21 The Inspector's Preliminary Conclusions (EX212 paragraphs 110 to 116) clearly indicate an **anticipated reduction in development capacity** in order to achieve the mitigation suggested and provide for defensible boundaries. This relates to the site's relationship with the wider Green Belt (paragraph 113) and reducing the development area within the allocation boundary to that unlikely to make a significant contribution to the purposes of the Green Belt (paragraph 115). In EX223 the Council nonetheless suggests that boundary planting outside the allocation boundary would be applied to this site as part of its proposed approach.
- 5.22 These observations reinforce concerns that the Council's overall proposed approach is in fact unclear and inconsistent with understanding the potential for exceptional circumstances being demonstrated to support proposed Green Belt boundary amendments.

c) Ignoring Potential Implications for Overall Development Capacity

- 5.23 There appear to be cases where the Council's suggested mitigation is determined by seeking to maximise the capacity of sites for development (i.e., by placing as much planting as possible outside of allocation boundaries) rather than ameliorating harm.
- 5.24 For the proposed North West Hatfield allocation (**SDS5 – Hat1**) the Council has yet to propose specific modifications regarding the additional mitigation to be provided. This is despite the Inspector's Preliminary Findings (EX212 paragraph 78) considering a submitted capacity for 1650 dwellings and stating:
- "The northern part of the site forms a part of the critical gap that separates the built-up areas of Hatfield and Welwyn Garden City. The stage 3 GB review has rated different parts of the site very high, high and moderate/ high. In this context, **the actual extent of built development and the location and form of the new GB boundary is critical and requires further detailed consideration. This should be reflected in revisions to the Key Diagram and the site's dwelling capacity.**" [SPRU emphasis]*
- 5.25 The Council's own Site Selection Background Paper acknowledges that parts of the site (particularly east of Green Lanes) could impact on the fragile gap with Stanborough and that the potential to define boundaries in this part of the parcel would be weaker than the existing parcel. Extensive green areas are suggested, with the Green Belt boundary **somewhere within this parcel**. This appears consistent with the Inspector's subsequent concerns regarding potential impacts upon capacity. The Council's proposed approach in EX223, which is currently undefined and does not address any change in dwelling numbers, does not appear to provide a sound basis to provide clearly identified and permanent boundaries.
- 5.26 Once again, the overall nature of impacts stems from the Council's proposed strategy not selecting sites resulting in the least potential harm to the Green Belt (and in the case of **Hat1** relying partly upon land resulting in 'High' harm).
- 5.27 In terms of the overall balancing exercise there are other instances where the Council's proposed approach looks to maximise capacity, rather than ameliorate overall impacts. For

example, the 2019 Site Selection Background Paper for **WGC4/4a** acknowledges that an alternative boundary defined within the allocated site may be similar to the existing relatively weak boundary, but *“would have the advantage of not requiring a larger area of land, which is landscape/heritage sensitive, to be released from the Green Belt.”*

- 5.28 As the Inspector's Preliminary Findings note (EX212 paragraph 65) this is a case where the definition of a new boundary based on existing features at the edge of the site may be appropriate, but this will need to consider impacts in the wider Green Belt. This will not necessarily be the result of additional planting outside the allocation boundary as suggested by the Council in EX223.

6.0 CONCLUSION ON EX223

- 6.1 In conclusion the approach the Council have now had to take to justify the site selection and to address the issue of impact on the Green Belt of these selected sites demonstrates:
- Firstly, that there are few sites that would not result in harm to the Green Belt; and
 - Secondly, that there are sites which have not been selected which would, even on the Council's own approach to site selection, including suitability of existing boundaries, require less mitigation and their resulting development would have a lesser impact on the Green Belt than some of the selected sites; and
 - Thirdly that the proposed approach in EX223 needs to be properly considered as part of the overall exercise in determining whether exceptional circumstances exist to support the amendment of Green Belt boundaries
- 6.2 It is of course recognised that in order to meet what we consider to be the housing requirement then these alternatives sites need to be allocated as well as the existing allocations.

APPENDIX 1 COMPARISON OF RECOMMENDATIONS FOR GREEN BELT MITIGATION AND BOUNDARY DEFINITION

Site Reference	Summary of Proposed Approach (cf. EX223 and EX235)	Green Belt Harm – Wider Parcel	Green Belt Harm (Site)	Site Selection Background Paper 2019 – conclusion on GB Boundaries ²
MM/14/TBC – Table 9 HS2 (WGC1)	Planting mainly outside site boundary	Very High	High	New boundaries would be predominantly weaker overall than the existing boundaries but would be clearly defined (moderate weight against).
MM/15/TBC – Table 10 HS11 (Hat11)	Planting mainly outside site boundary	High	Moderate High	New Green Belt boundaries would be predominantly weaker than the existing boundaries but would be clearly defined (moderate against) (significant against in the case any extension into steeply sloping embankment).
MM/15/TBC – Table 11 HS15 (WGr1)	Planting mainly outside site boundary	Very High	Moderate High	Release of this parcel is not considered to result in weakening the Green Belt edge (moderate weight against). Impact would be minimised if northern edge of site were aligned with the existing northern edge of the settlement (and allowed for the need to achieve access) (minor against)
MM/18//TBC – Table 13 HS20 (Wel3)	Landscaping within allocation boundary; ownership constraints	High	Moderate High	A new Green Belt boundary could be formed with clearly defined and defensible boundaries which would be similar in strength to the existing boundary (moderate weight in favour).
MM/20/TBC – Table 14 HS35 (GTLAA01)	Landscaping within allocation boundary; ownership constraints	High	Moderate Low	The boundaries to the south would be weaker but clearly defined overall. This is attributed (moderate weight against) the site
MM/22/TBC – Table 16 HS25 (LHe1)	Planting mainly outside site boundary	High	Moderate Low	The reduced site area (as concluded in 2016) has a revised boundary which would allow for a gap to be retained between Little Heath and Swanley Bar and prevent these villages from merging, thus reducing the adverse weight attributed to full extent of the promoted site. The new Green Belt boundary would be weaker than the existing boundary (minor against).

² All weightings (shown bold) taken from Appendix A of the Council's Site Selection Background Paper (2019)

Site Reference	Summary of Proposed Approach (cf. EX223 and EX235)	Green Belt Harm – Wider Parcel	Green Belt Harm (Site)	Site Selection Background Paper 2019 – conclusion on GB Boundaries ²
MM/23/TBC – Table 17 HS28 (Cuf6)	Landscaping within allocation boundary; ownership constraints	Moderate High	Moderate	New Green Belt boundary would be similar in strength to the existing and clearly defined, forming a logical, defensible boundary (moderate in favour) .
MM/23/TBC – SADM33 HS27 (Cuf1 Meadway)	Planting mainly outside site boundary	Moderate High	Moderate	The proposed new Green Belt boundary as formed by the extent of the site would be similar in strength to the existing boundaries and would be clearly defined and defensible. (Moderate in favour) North-south boundary recommended to limit eastward expansion - would not be defined by existing physical features on the ground and would need to be defined by post development features (Minor against)
SDS1 WGC4/4a – Panshanger and Extension	No specific proposed modification; EX223 suggests planting outside allocation boundary	Moderate High	Moderate High	Proposed new boundaries would be stronger overall than the existing boundaries and would be clearly defined and defensible (significant in favour) . Alternative reduced boundaries within the site would be similar in strength to the existing boundaries (moderate in favour) .
SDS2 WGC5– Birchall Garden Suburb	No specific proposed modification; EX223 suggests planting outside allocation boundary	Moderate High	Moderate High	New Green Belt boundaries would be stronger overall than the existing boundaries. The eastern green belt boundaries have been defined by East Herts District Council (moderate in favour) .
SDS5 Hat1 – North West Hatfield	No specific proposed modification; EX223 suggests Green Buffer along Coopers Green Lane and planting both within and outside the Green Belt on land within the ownership of the promoter	Very High/Moderate	High	New boundary would be of moderate strength (part minor road, part property boundary), similar overall to existing; this is accorded moderate weight in favour of the site. A fragile gap exists between Hatfield and Stanborough. Development of this site would significantly reduce this gap but ensuring the Green Belt boundary was amended in accordance with Parcel 41e would ensure the most important separation is retained (moderate against) .

Site Reference	Summary of Proposed Approach (cf. EX223 and EX235)	Green Belt Harm – Wider Parcel	Green Belt Harm (Site)	Site Selection Background Paper 2019 – conclusion on GB Boundaries ²
HS24 BrP7 South of Hawkshead Road	EX223 indicates planting mainly outside allocation boundaries Proposed for deletion	Very High	High	The reduced site area (as concluded in 2016) has a revised boundary which would allow for a gap to be retained between Little Heath and Swanley Bar and prevent these villages from merging, thus reducing the adverse weight attributed to full extent of the promoted site. The new Green Belt boundary would be weaker than the existing boundary (minor against).
HS29 Cuf12 North of Northaw Road East	EX223 indicates planting mainly outside allocation boundaries Proposed for deletion	High	High	Overall, new Green Belt boundaries formed by Cuf12 would be predominately weaker than the existing boundary and the long northern boundary of Cuf12 would not be defined by physical features (significant against) (reduced site area based on 'infill' boundary recommended)
Wel1/Wel2/Wel15	N/A	Moderate High	Moderate High	The amended Green Belt boundary would be slightly weaker in parts than existing, but clearly defined (minor in favour) (Wel1) Green Belt boundary would be similar in strength to existing (minor in favour) (Wel2) The Green Belt boundary will be no weaker than existing (minor in favour) (Wel15)
WGr3	N/A	Very High	Moderate	The amended green belt boundary would be predominately weaker than the existing but would be clearly defined (moderate against)

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On behalf of
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**RTPI**

Chartered Town Planner

