

Welwyn Hatfield Local Plan Examination

Stage 9 Hearings

Treatment of Green Belt Boundaries:

Note by Welwyn Hatfield Borough Council

EX223

Statement by Jed Griffiths MA DipTP FRTPI

On Behalf of

Woolmer Green Parish Council

February 2021

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of Woolmer Green Parish Council. It has been compiled in response to an invitation by the Examination Inspector to comment on a note (EX223) published by Welwyn Hatfield Borough Council (WHBC) in December 2020 *Treatment of Green Belt Boundaries of Allocations in the Welwyn Hatfield Local Plan*. The comments made in this statement are made **without prejudice** to the Parish Council's stated views against the development of sites in the Green Belt. The points made below are also endorsed by Knebworth Parish Council.

The General Approach

2. In response to the introductory paragraphs in EX223, Woolmer Green Parish Council agrees with the general premise that, where development is proposed, its impact on the Green Belt should be minimised. Ideally, a tree buffer within a site boundary should remain within the Green Belt. From its experience of previous hearings, however, especially Stage 6 on individual sites, the Parish Council does understand the Borough Council's aspiration to take a more strategic approach to the treatment of Green Belt boundaries.
3. With regards to the proposed general approach, however, the Parish Council does have some misgivings. "Substantial tree planting" is not defined and should be explained. In the Parish Council's view, it is not appropriate to provide tree planting or any other form of landscaping outside the boundaries of a site solely in order to maximise the delivery of new housing on it. If this principle were to be applied as a general rule, the Parish Council believes that this would encourage developers to bring forward schemes to maximise densities, at the expense of the quality of layout and landscaping within the site.
4. There may be instances where, even if land adjacent to a site is in the same ownership, the landowner may not wish to replace it with woodland or other forms of landscaping. It may be high grade agricultural land, as in the case of site HS15. The Parish Council suggests that any approach which would involve the depletion of valuable land would be unsound.
5. As indicated in EX223, there will be a number of other exceptions to the general approach. In instances where a developer does not own land adjacent to a site boundary, it is suggested by the Borough Council that this difficulty could be overcome if the developer purchases adjoining land within the Green Belt. In many cases, this will not be possible. Failure to deliver the development may therefore affect the soundness of the proposal.

The Sites

6. The Parish Council has studied carefully the sites listed in EX223 and has concluded that only nine would fit with the Council's approach and eighteen would not. In the Parish Council's submission, this is sufficient to cast severe doubts on the proposed approach proposed to the definition of Green Belt boundaries. Accordingly, the Parish Council suggests that a site-by-site process may be more appropriate – all allocations should be looked at individually. Screening of a site should not be considered in isolation from the development of a site as a whole. It is suggested that the internal design of a site, its layout and landscaping are also critical so that the development is, as far as possible, absorbed into the surrounding Green Belt landscape. It is also suggested that all tree planting should be protected by Tree Preservation Orders.
7. There is only one site listed in the note, where Green Belt planting is suggested as mainly adjoining but outside the site boundary, Site WGr1 (HS15) East of London Road. The Parish Council made representations against the development of the site for housing, which were considered at the Stage 6 Hearings. Reference to off-site planting was made, which was acknowledged by the Inspector in his Interim Report to the Borough Council.
8. The Parish Council maintains its objection to the development of the site for housing and its removal from the Green Belt. In terms of the approach suggested in EX223, however, should the site be allocated in the Local Plan, the Parish Council would support off-site planting to screen the view into area from the north. This would depend, however, on the ability of the developer to secure the necessary area of land to deliver the tree-planting screen. It should be noted, however, that there is already a copse to the north of the site (see appended photograph). This should be incorporated into any landscaping screen – it is well-known for its wildlife, including bats and badgers. Tree planting should be on the top ridge line of the slope to maximise its impact.

Conclusion

9. The Parish Council's comments, as set out in this statement, are in response only to the Borough Council's note EX223. Representations on individual sites will either have been tendered in connection with the Stage 6 Hearings, or will be presented at Stage 9 (as appropriate).

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Hertford

4th February 2021