

WELWYN HATFIELD LOCAL PLAN EXAMINATION: GREEN BELT BOUNDARIES RESPONSE TO WHBC ADDITIONAL DOCUMENT EX223: FEBRUARY 2021

Representations of CPRE Hertfordshire

Campaign to Protect Rural England Hertfordshire (CPREH) wishes to comment on the approach to how Green Belt boundaries to sites proposed for removal from the Green Belt should be determined, as set out in WHBC document EX223, as follows.

The 'Introduction' paragraph refers to ensuring that the design of development seeks to minimise harm to Green Belt 'purposes' only. This proposed context for how Green Belt boundaries should be treated, fails to address the fundamental aim of national policy (NPPF 2012, paragraph 79) of keeping land permanently open, and that one of the essential characteristics of the Green Belt is its openness. Openness is not addressed by the five purposes of the Green Belt set out in the NPPF at paragraph 80. Overlooking this vital consideration casts doubt over whether the Council's proposed approach would adequately protect the Green Belt from harm additional to that already arising from the removal of proposed development sites from the Green Belt.

In the 'Introduction', possibly because of the above oversight, WHBC fail to address the importance of ensuring that any 'design elements', for example bunds or other engineered features or structures, intended to 'strengthen' boundaries, avoid, or at least minimise, the impact on Green Belt purposes, and on openness.

In the event that any such features are necessary to minimise harm to the Green Belt from development of the site, they should be created within the site boundary, and not on land beyond that boundary, if that adjacent land is within the Green Belt. Such features created by engineering works are only 'not inappropriate', as defined in the NPPF 2012 (paragraph 90) if they preserve the openness of the Green Belt, and do not conflict with any Green Belt purposes.

The Council's 'Proposed Approach' at paragraph 2 refers to 'other strategic landscaping', which must include works other than tree and shrub planting. If this includes altered landforms, or structures and fencing which may themselves be harmful to openness or any Green Belt purpose, these elements should only be permitted within the boundaries of site allocations that are to be removed from the Green Belt.

In the event that such criteria cannot be met, there must be doubt as to whether the necessary exceptional circumstances exist for the proposed allocation or site to be removed from the Green Belt in the first place. Such considerations should be included in weighing claimed exceptional circumstances against harm to the Green Belt in each case.

Policies in the Plan for the preparation of masterplans should reflect this wider context, to avoid extending the harm from the removal of land from the Green Belt, beyond the areas hitherto defined by the Council, and that consultees on the Plan have understood to be affected by the Plan's policies and proposals.

CPRE Hertfordshire: February 2021