

Response to the Inspector's request for consultation on other examination submissions - by Cllr Paul Zukowskyj

Dear Sir,

I write in response to the examinations documents consultation with the following observations on the various documents:

EX223 – Green Belt Boundaries Approach

I note the council's approach to embedding landscaping and tree buffers suggests these can be outside the development site, and within the green belt.

The issue with this approach is that green belt is therefore immediately adjacent to development plots, and at the edge of the green belt the buffer is ineffective on protecting the openness of the green belt, as it is behind any observer.

In terms of 'openness' of the green belt this approach is clearly not delivering for an observer at the green belt boundary, as there is no 'buffer' at all and the openness of the adjacent green belt is significantly undermined.

The result of such an approach is to undermine the quality of the adjacent green belt parcel, making sprawl in future assessments more likely as the quality of the green belt in the adjacent parcel has been significantly undermined.

EX226 – Hat 1

The council is still proposing changing the green belt boundary to release this area of high and very high harm assessed land for development. It uses for justification for this the developers indicative masterplan. It suggests there are special circumstances for release of the high and very high harm parcels, because this is a school site.

There has been no planning application submitted. No certainty therefore exists that the site would indeed remain the school site. Once released from the green belt, the land is available for development. Making the case that the particular circumstances indicate a higher harm site should be released is, as I understand the process, one for a planning application and the application of 'very special circumstances'. Indeed, there have been multiple situations where such school applications have been heard recently for school sites.

The location is clearly harmful to the green belt. The assessment was very high and high harm. Suggesting the development will be a school site is not appropriate justification as no certainty exists it will in fact be that use and it indeed predetermines the planning application that ought to be the correct place for assessment of the special circumstances or otherwise that justify the development at that specific location.

EX230 and appendices – HS11

I note the council's comments on visibility of the development, most specifically the 'adjustment' of the 'sinuous' line to attempt to limit the visual impact of the development on the wider green belt. The housing development at the western end of this site is likely to be visible from vantage points to the west, and the developers use of strategically placed viewpoints in the cemetery and adjacent park and ride are clearly spurious. This development will be visible from land to the west of the A1M, including the well used Alban Way. It will contribute to the perception of

Hatfield as a 'built form' in a similar, albeit lower, way to the buildings of the University of Hertfordshire do currently.

The intervisibility comments and discussion is also spurious in that it was clear to all that the ridge would shield views of the development from Welham Green, the main impact was from southern Hatfield, where Hatfield would now be perceived to reach much further south. I note no viewpoint from, say, the Acacia Road public open space is presented, as this would have clearly shown the deleterious impact of the development on the perceived separation of the town and village.

The note from the County Council also appears to be rather misrepresented in WHBC's covering letter. WHBC suggest the county do not think an 'all through' school is deliverable on the New Barnfield site. This is not what is stated. Indeed, the suggestion the New Barnfield curtilage is as extensive as shown in EX234 suggests otherwise. The County merely says co-location at this site would constrain the potential size of the secondary school, but give the revision of the SoCG to agree delivery of 18FTE, an 'all through' school with 6FTE in secondary, for example, may well deliver precisely the education provision needed in an effective and efficient way, although this modelling of potential FTE need has yet to be done since the OAN is still under discussion for revision.

The school provision is used by the developer and WHBC to justify the inclusion of HS11, however a suitable, available and deliverable site, in an adjacent location and benefitting from co-location of primary and secondary, is also demonstrated, where the alternative site is a Major Developed Site in the Green Belt and therefore the impacts and adverse outcomes on the green belt are largely or wholly avoided. The justification through education provision need is therefore spurious and the site should be assessed purely on its merits as a housing only site.

If the site is assessed solely on its merits as a housing site, the serious reduction in strength of the green belt boundary for the provision of just 120 housing units is clearly not offset.

I therefore respectfully suggest this site is NOT allocated in any adopted local plan.

Cllr Paul Zukowskyj MSc FRGS

Welwyn Hatfield Borough Councillor for Welham Green and Hatfield South

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