

**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**

**North Mymms District Green Belt Society**

**February 2021**

## 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 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 Society's stated objections against the development of sites in the Green Belt.

## The General Approach

2. In response to the introductory paragraphs in EX223, the Society agrees with the general premise that, where development is proposed, its impact on the Green Belt should be minimised. From its experience of previous hearings, especially Stage 6 on individual sites, the Society does concur with the need for the Borough Council to take a more strategic approach to the treatment of Green Belt boundaries.
3. With regards to the proposed general approach, however, the Society does have some misgivings. It is not appropriate to provide tree planting or any other form of landscaping outside the boundaries of a site in order to maximise the delivery of new housing on it. If this principle were to be applied as a general rule, the Society 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. As indicated in the note, there will be a number of exceptions to the general approach. In instances where a developer does not own land adjacent to a site boundary, it is suggested by the 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.
5. The other exceptions listed in EX223 may be sufficient to cast doubts on the approach proposed by the Borough Council. Accordingly, the Society suggests that a site-by-site process may be more appropriate. 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.

6. In terms of the more comprehensive approach, the Society considers that, for the larger site allocations, a Masterplan should be required from the prospective developer. This would accord with the Government's current support for the use of design codes. The principle has been incorporated into the adopted East Hertfordshire District Plan 2018. Policy DES1 Masterplanning states as follows:

*"i. All "significant" development proposals will be required to produce a Masterplan setting out the quantum and distribution of land uses; access; sustainable high-quality design and layout principles; necessary infrastructure; the relationship between the site and nearby land uses; landscape and heritage assets; and other relevant matters.*

*ii. The Masterplan will be collaboratively prepared, involving site promoters, landowners, East Herts Council, town and parish councils, and other relevant stakeholders. The Masterplan will be further informed by public participation.*

*iii. In order to ensure that sites are planned and developed comprehensively, any application for development on part of the site will be assessed against its contribution to the Masterplan as a whole."*

7. The Society commends this more holistic approach to housing developments on large sites. It is suggested that it could be incorporated into the Welwyn Hatfield Local Plan, possibly as a modification to Policy SADM11. In addition to the design elements of the East Herts policy, one of its key strengths is its collaborative ethos.

### **The Sites**

8. For the list of sites where Green Belt planting is suggested as mainly adjoining but outside the site boundary, the Society has the following comments:
- **HS11/HAT11 South Way** – agreed. The strengthening should be on the ridge line to the south of the site.
  - **HS24/BrP7 South of Hawkshead Road** – this was discussed at the Stage 6 hearings. The need for screening was referred to by the Inspector in his Interim Report.
  - **HS25/LHe1 North of Hawkshead Road** - this should be part of a more comprehensive landscape strategy for the whole of the area to the north of Hawkshead Road. There is no evidence as to whether planting beyond the site boundary can be delivered.

9. For all the other sites listed, The Society has the following comments, as appropriate:

- **HS35/GTAA01 Foxes Lane** – agreed.
- **SDS7/WeG4b Marshmoor** – agreed. The more comprehensive approach to the development of this site was discussed at the Stage 6 Hearings and is referred to in the Inspector’s Interim Report to the Borough Council.
- **HS21/BrP13 West of Golf Club Road** – agreed.
- **HS22/BrP4 West of Brookmans Park** – agreed. If this site were to be developed, it is vitally important for development to be contained within the site. As explained at the Stage 6 hearings, the site is set within an extremely sensitive area of Green Belt and rural landscape.
- **HS23/BrP14 East of Golf Club Road** – agreed.
- **WeG3a Welham Manor** – agreed.
- **WeG10 Dixons Hill Road** - agreed, but if the site were to be developed, the Society would stress the need for landscape strengthening on its western boundary.
- **BrP1 Upper Bell Lane** – the A1000 in itself is not a suitable Green Belt boundary. Planting within the site would need to include measures designed to enhance the eastern edge of the development adjacent to the road.
- **LHe4/LHe5 Videne and Studlands** – the proposed approach is incompatible with that suggested for site LHe1 (see above). A more comprehensive approach would be required for the whole of the area to the north of Hawkshead Road.

### Conclusion

10. The Society’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

7<sup>th</sup> February 2021