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Welwyn Hatfield Green Belt Study Stage 3

Final Report (with additional clarifications post Examination)

Prepared by LUC
March 2019

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Welwyn Hatfield Green Belt Study Stage 3: Final Report (with additional clarifications post Examination)

Welwyn Hatfield Borough Council published the Stage 3 Green Belt report in August 2018. A Local Plan Examination Hearing was held on the 6th and 7th November to discuss the methodology for the Green Belt Study. The Inspector concluded at the end of these sessions that the Green Belt Study methodology is robust.

A number of questions were raised in the course of the hearings and in the light of these further clarifications have been added to the methodology section of this report. For ease of reference, these are highlighted in yellow in this report.

In response to the consultation on the methodology, a number of representations commented that they considered that the assessment of harm was not carried out on a consistent basis. The Inspector therefore undertook a round of consultation in December 2018 on the consistency of the scorings and sub-division of parcels.

A full review of all the assessment findings was undertaken by LUC and a detailed commentary of LUC's responses to the representations on points of consistency is provided in the Post Examination Addendum at the end of this report. The assessment of harm section of the report (**Chapter 7**) and all relevant figures have been updated accordingly.

LUC, March 2019

1 Introduction

1.1 Welwyn Hatfield Borough Council submitted its draft Local Plan to the Secretary of State in May 2017 and its Examination is currently underway. At the end of the Stage 2 hearing session in October 2017, the Inspector identified a need for further work in order to expand the findings of the Council's Green Belt review evidence. LUC was commissioned by Welwyn Hatfield Borough Council in March 2018 to undertake this additional Green Belt work.

1.2 This Study has three key aims:

- To undertake a comprehensive and rigorous assessment of the Green Belt to establish which areas are 'most essential' to retain; and which areas, if developed, could have less harm on the Green Belt.
- To review the existing 'washed over' settlements and consider the extent to which they contribute to the openness of the Green Belt and whether there is any justification in terms of their openness (or lack of) to inset them.
- To assess the contribution to the Green Belt purposes of all land within the Borough to establish if there are any areas of weaker performing Green Belt that may be more suitable (in Green Belt terms) for a new settlement.

1.3 The following sections set out the background to the study, the key study objectives and the structure of the remaining report.

Background

1.4 Approximately 79% of Welwyn Hatfield is designated as part of the metropolitan Green Belt. The Borough has two towns and eight excluded villages, which jointly comprise the Borough's main urban areas. A network of small settlements is located within the Green Belt.

1.5 Welwyn Hatfield Borough Council submitted its draft Local Plan to the Secretary of State in May 2017 and its Examination is underway. Welwyn Hatfield Borough's proposed housing target of 12,000 is 3,200 below its current objectively assessed housing need (4,000 if the need for housing is extended to 2033) and the Council must show that it has taken all reasonable steps to demonstrate whether it is able (or not) to meet the full objectively assessed need (OAN). The Council has made the case that there are exceptional circumstances for limited alterations to the Green Belt in the Borough. Proposed releases in the draft Local Plan would reduce the coverage of the Green Belt in the Borough from 79.1% to 75.4%.

1.6 The submission Local Plan has reviewed Green Belt boundaries around its towns and inset villages and is also proposing a new village location (Symondshyde) to help accommodate growth requirements. However, the Council is now exploring whether any additional options could be considered for reducing the housing shortfall against the OAN and whether or not there are any opportunities to safeguard land to meet future development needs beyond the plan period.

1.7 At the end of the Stage 2 hearing session in October 2017, the Inspector identified a need for further work in relation to the Green Belt. Specifically the Inspector asked the Council to submit evidence to the examination identifying which parts of the Borough's Green Belt are 'critical' to retain. In a written note after the hearing (see **Appendix 1.1**), the Inspector explains that additional technical work is needed to understand how different areas of land perform against the purposes of the Green Belt so that there is clear evidence about which land is essential to the function of the Green Belt and which is not. LUC was commissioned by Welwyn Hatfield Borough Council to undertake this additional Green Belt work.

1.8 This study builds on the Council's existing Green Belt evidence base comprising:

- **Stage 1 Green Belt Assessment (2013)** – 'Green Belt Review Purposes Assessment', Prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council by Sinclair Knight Merz (SKM). The purpose of this study was to review the existing Green Belt in the study area in the context of the NPPF (2012) and to consider the extent to which it contributes to the fundamental aim of retaining openness and the purposes of including land in the Green Belt.
- **Stage 2 Green Belt Review (2014)** – Prepared for Welwyn Hatfield Borough Council by Jacobs (formerly SKM). The Stage 2 Study assessed a total of 67 Green Belt sites identified by the Welwyn Hatfield Borough Council Strategic Housing Land Availability Assessment (SHLAA), the Gypsy and Traveller Land Availability Assessment (GTLAA) call for sites and areas of the Green Belt recommended for further assessment in the Stage 1 study.
- **Stage 2 Green Belt Review Addendum (2016) –** Prepared by Welwyn Hatfield Borough Council. This comprised a Green Belt and a local purposes assessment of an additional 10 sites identified as suitable through the Housing and Employment Land Availability Assessment 2016. It was carried out by the Council using the methodology developed by Jacobs for the original Stage 2 Review.

1.9 The Inspector raised a number of issues in his comments (See **Appendix 1.1**) regarding the scope of the additional work that the Council should undertake in order to expand the findings of the previous Green Belt studies. Some of the key points raised included:

- The need for further justification on the soundness of the development strategy put forward in the Local Plan, specifically setting out why it was not possible to find other sites within the Green Belt.
- The need for a finer grain approach than the Stage 1 Green Belt study to reveal variations in the performance of the Green Belt. The Inspector suggested that the Stage 1 Study was too strategic to provide useful information on the degree of harm to the Green Belt purposes caused by the development of smaller parcels.
- The need to consider all potential development sites adjacent to the urban areas. The Inspector noted that whilst the Stage 2 Green Belt Review did look at the finer grain of sites, it did not examine all potentially suitable areas and did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels.
- The recommendation that if the quantum of development required can't be met adjacent to urban areas, the Council should assess other locations that are large enough to accommodate a new settlement.

Study Aim and Objectives

1.10 The key aim of this study is to expand the coverage of the Stage 2 Green Belt assessment to identify the degree of harm to the Green Belt that may result from its release and therefore identify which areas are most essential to retain, or could be considered for release (subject to the consideration of wider sustainability factors).

1.11 The detailed objectives of the study are to:

- Divide the Green Belt into appropriate parcels for assessment (at a finer grain of detail than the Stage 1 study) and **appraise these against the nationally defined purposes of the Green Belt** as set out in the NPPF, ensuring consistency (where possible) with the Stage 1 and Stage 2 Green Belt studies. This appraisal is underpinned by an understanding of the strategic-scale role of the Green Belt in Welwyn Hatfield.
- Provide clear conclusions on the **potential degree of harm** that may occur if areas of land were released from the Green Belt, taking into account the contribution of the land to the Green Belt purposes, the potential impact on the wider integrity of the Green Belt and the strength/continuity of revised Green Belt boundaries.

- Draw conclusions on which areas are **most essential to retain** (in Green Belt terms).
- Undertake a review of the **washed over settlements** to establish the extent to which they contribute to the openness of the Green Belt and whether there is potential to inset them.
- Assess the potential harm to the Green Belt of **new settlement locations**.

1.12 It is not the purpose of this study to identify potential sites of suitability for housing development; rather to present the evidence in relation to Green Belt issues for the Council to consider alongside wider sustainability and viability factors as part of the preparation of the Local Plan.

Structure of this report

1.13 The remainder of this report is structured as follows:

- **Chapter 2** summarises the policy context.
- **Chapter 3** describes the assessment methodology.
- **Chapter 4** provides a strategic assessment of the role of Green Belt in the Borough.
- **Chapter 5** sets out the findings of the assessment of washed over settlements.
- **Chapter 6** summarises the assessment of the contribution that land makes to the Green Belt purposes (as defined in the National Planning policy Framework (NPPF)).
- **Chapter 7** summarises the findings of the assessment of harm of releasing Green Belt land.
- **Chapter 8** addresses the key Green Belt issues in relation to the development of new settlement locations.
- **Chapter 9** considers which areas constitute the 'most essential' Green Belt within the Borough.
- **Chapter 10** provides conclusions and sets out recommendations and next steps.

1.14 The four appendices contain the following:

- **Appendix 1.1:** Inspector's comments on Green Belt issues as raised at the end of the Stage 2 Hearings of the Local Plan Examination.
- **Appendix 5.1:** Assessment of washed over settlements.
- **Appendix 5.2:** Development scenarios for washed over settlements
- **Appendix 6.1:** Detailed assessment findings of Green Belt contribution and harm.

2 Policy Context

2.1 This chapter sets out the study's policy context, specifically the origins and evolution of the Green Belt within Welwyn Hatfield and the national, regional and local planning policy and practice guidance and relevant planning inspector and planning appeal case law.

Evolution of the Metropolitan Green Belt

2.2 The Green Belt within Welwyn Hatfield forms part of the Metropolitan Green Belt. The principle of maintaining a ring of open country around London can be traced back to the 16th century when, by royal proclamation, Elizabeth I forbade any building on new sites within three miles of the city gates of London. This was motivated by public health reasons, to prevent the spread of the plague, and to ensure a constant supply of food for the metropolis.

2.3 The importance of these considerations was later recognised by Ebenezer Howard, a pioneer of British town planning, in his book of 1898 Tomorrow: a Peaceful Path to Real Reform in which he referred to '*an attractive setting within the town could develop and which would maintain, close at hand, the fresh delights of the countryside- field, hedgerow and woodland*'.

2.4 The only mechanism available at the time to realise this vision, however, was the acquisition of land by public authorities. The most active agency in this field was the City of London Corporation whose programme of acquisition, initiated in 1878, included Epping Forest and Kenley Common.

2.5 The Metropolitan Green Belt as a standalone concept was first suggested by Raymond Unwin in 1933 as a 'green girdle'. In 1935 the London County Council put forward a scheme '*to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable*'. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around London were purchased by the London County Council and adjacent counties, either individually or jointly.

2.6 During the Second World War, the newly formed Ministry of Town and Country Planning commissioned Professor Patrick Abercrombie to prepare an advisory plan for the future growth of Greater London. The Ministry gave its formal approval of Abercrombie's Green Belt proposals and the 1947 Town and Country Planning Act enabled local authorities to protect Green Belt land without acquiring it.

2.7 In 1955 the Government established (though Circular 42/55) the three main functions of the Green Belt as:

- checking growth of large built-up areas;
- preventing neighbouring settlements from merging; and
- preserving the special character of towns.

2.8 Emphasis on the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries only to be amended in exceptional circumstances was established through Circular 14/84.

2.9 In January 1988 PPG (Planning Policy Guidance Note) 2, Green Belts (subsequently replaced in 1995 and further amended in 2001) explicitly extended the original purposes of the Green Belt to add:

- to safeguard the surrounding countryside from further encroachment; and

- to assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).

2.10 PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012. The NPPF was updated in July 2018 and currently sets out national Green Belt policy. The position of the Government in relation to Green Belt, provided through the NPPF, is detailed further ahead in this report.

2.11 The Greater London Development Plan, approved in 1976, defined the full extent of the London Metropolitan Green Belt, including within Welwyn Hatfield. It stated that '*The Green Belt gives definition to the built-up area as a whole, limits urban sprawl and provides an area where open recreational activities can take place. At the same time it plays an important role in the retention of areas of attractive landscape on London's fringes*'.

2.12 As of March 2017 the entirety of the Metropolitan Green Belt covers around 514,000 hectares across 67 local authorities distributed between the regions of London, the East and South East. As such, land within the Metropolitan Green Belt accounts for approximately 31% of the total 1,634,700 hectares of Green Belt land in England.

The Green Belt in Welwyn Hatfield

2.13 The Green Belt in Welwyn Hatfield takes up 10,250 hectares[1] of the total 12,955 hectares in the Borough[2]. As such, approximately 79% of the Borough falls within the Green Belt. The Green Belt in Welwyn Hatfield forms part of the wider area of Metropolitan Green Belt which falls within the County of Hertfordshire. The Green Belt in Hertfordshire as a whole takes in approximately 90,000 hectares (55%) of land out of a total area for the County of 164,300 hectares[3]. In Welwyn Hatfield, the Green Belt is drawn tightly around the larger settlements including Welwyn Garden City, Hatfield, Welwyn, Welham Green, Brookmans Park and Cuffley as well as the smaller settlements of Woolmer Green, Oaklands and Mardley Heath, Digswell and Little Heath as shown in **Figure 2.1**. Symondshyde is a proposed new village which will be excluded from the Green Belt in the new Local Plan. The remaining settlements lie within the boundaries of the Green Belt and are washed over by the designation.

2.14 The Green Belt in the wider Hertfordshire area and Welwyn Hatfield originated through the Hertfordshire County Development Plan (1958). The plan designated the area in the south of the County as Green Belt in response to pressures for the expansion of towns in the County. The Green Belt was extended into the northern portion of the county along the A1M corridor as part of the first review of the County Development Plan which was adopted in 1971. The late 1970s saw the northern part of Welwyn Hatfield designated as Green Belt. In practice the 1979 Hertfordshire County Structure Plan approved in principle the designation of Green Belt land as part of the Metropolitan Green Belt about 12-15 miles deep allowing for limited extensions along the main transport corridors. This update to the Green Belt extended it as far north in Hertfordshire as the land around Stevenage, Hitchin, Letchworth Garden City and Baldock.

2.15 The Hertfordshire County Structure Plan Alterations Number 1 in 1984 saw further minor additions to the Green Belt including land around Markyate. The plan approved the principle of Green Belt land in Hertfordshire to the east of Luton, thereby linking it to the Green Belt set out in the Bedfordshire County Structure Plan.

2.16 The most recent Structure Plan was adopted in 1998. A countywide Green Belt review was not recommended at that stage although inner boundary reviews were allowed for to facilitate development at major settlements and a strategic development. The plan instead emphasised the permanence of the Green belt boundaries stating: *'An essential characteristic of the Green Belt is its permanence and its protection in Hertfordshire must be maintained as far as can be seen ahead, with the Structure Plan providing the strategic policy framework for planning at local level'.*

[1] ONS (September 2017) Local Authority Green Belt Statistics

[2] ONS (March 2013) 2011 Census: Population Estimates by five-year age range bands, and Household Estimates, for Local Authorities in the United Kingdom

[3] North Hertfordshire District Council (July 2016) North Hertfordshire Green Belt Review

National Planning Policy

2.17 Government policy on Green Belt is set out in chapter 13 of the National Planning Policy Framework (NPPF). This study was prepared in the context of the 2012 version of the NPPF, however as the 2018 version of the NPPF was published before the study was completed, the following section refers to the most up to date policy framework. There were no changes to the NPPF that necessitated any changes to the methodology or which could materially affect its results.

2.18 Paragraph 133 of the NPPF states that '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'*.

2.19 This is elaborated in NPPF paragraph 134, which states that Green Belts should serve five purposes, as set out below.

The purposes of Green Belt:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.20 The NPPF emphasises in paragraph 136 that '*once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans'*.

2.21 Paragraph 137 requires that the *'strategic policy-making authority should be able to demonstrate that is has examined fully all other reasonable options for meeting its identified need for development'* before concluding that the exceptional circumstances exist, specifically whether the strategy:

- *'makes as much use as possible of suitable brownfield sites and underutilised land;*
- *optimises the density of development…including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*
- *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.'*

2.22 Paragraph 138 of the NPPF indicates that '*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'*.[4]

2.23 Paragraph 139 of the NPPF suggests that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period. New boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period. New boundaries should be defined clearly, using readily recognisable, permanent physical features.

[4] This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

2.24 Paragraph 138 outlines the need to promote sustainable patterns of development when revising Green Belt boundaries and requires land which has been previously developed and/or well served by public transport to be given first consideration. Furthermore, plans *'should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'.*

2.25 Paragraph 135 of the NPPF indicates that, if proposing new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

2.26 Additionally, Paragraph 136 clarifies that '*where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans'*.

2.27 Current guidance, therefore, makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states that '*local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land*' (Paragraph 141).

2.28 It is important to note, however, that these positive roles should be sought for Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Openness is not synonymous with landscape character or quality.

2.29 Paragraphs 143 and 144 of the NPPF state that '*inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances…'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*.'

2.30 Paragraphs 145 sets out the types of development that are appropriate in the Green Belt:

a. *'buildings for agriculture and forestry;*

b. *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*

c. *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

d. *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*

e. *limited infilling in villages;*

f. *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*

g. *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'*

2.31 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

a. *'mineral extraction;*

b. *engineering operations;*

c. *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*

d. *the re-use of buildings provided that the buildings are of permanent and substantial construction;*

e. *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*

f. *development brought forward under a Community Right to Build Order or Neighbourhood Development Order.'*

National Planning Practice Guidance

2.32 The National Planning Practice Guidance (NPPG) adds further context to the National Planning Policy Framework. In effect it provides guidance to put the policy of the framework into practice. The issue of addressing housing and economic needs to be balanced against constraints such as Green Belt is addressed through Paragraph 044[5] which states that:

> *'Local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to … land designated as Green Belt … The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.'*

2.33 The NPPG at Paragraph 045[6] also clarifies that SHLAA preparation should be undertaken to consider land which would be identified to meet the housing requirement over the plan period in terms of the assumptions about its availability, suitability and the likely economic viability. It is also, however, clarified that *'any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need'* should be taken into account.

London Planning Policy

London Plan Green Belt Policy

2.34 The positive role of the Green Belt is reflected in the adopted London Plan (2011), which states:

> '*Green Belt has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life. Positive management of the Green Belt is a key to improving its quality and hence its positive benefits for Londoners.'*

[5] DCLG (March 2014) National Planning Policy Guidance - Reference ID: 3-044-20141006 Available on at: https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment

[6] DCLG (March 2014) National Planning Policy Guidance - Reference ID: 3-045-20141006 Available on at: https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment

2.35 The Mayor strongly supports the current extent of Green Belt and its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of Green Belt.

New Draft London Plan

2.36 Public consultation on a new draft London Plan took place between December 2017 and March 2018. The adopted Green Belt Policy 7.16 has been replaced by Policy G2. Although the policy has been rewritten, there are no material changes to the policy, which is consistent with national Green Belt policy.

Local Policy and Green Belt Studies

Local Plan

2.37 The current planning policy for Welwyn Hatfield comprises the Welwyn Hatfield District Plan (2005) and adopted Supplementary Planning Documents (SPDs) as well as those policies which are applicable from plans which are in place at county level to address strategically provided services including:

- Hertfordshire Minerals Local Plan 2002-2016 (2007).
- Hertfordshire Waste Core Strategy and Development Management Policies Document (2012).
- Hertfordshire Waste Site Allocations Document (2014).

2.38 Welwyn Hatfield District Plan saved Policy GBSP1: Definition of the Green Belt, previously highlighted in this report, addresses the designation's boundaries in the Borough. This policy states that '*the Green Belt will be maintained in Welwyn Hatfield*' and that '*towns and specified settlements listed in Policy GBSP2 are excluded from the Green Belt'*. The supporting text of the policy states that the Council is satisfied that the needs for growth in the District up to 2011 and beyond *'can be accommodated on sites identified within the towns and specified settlements excluded from the Green Belt.'*

2.39 The emerging Local Plan will shape the future of development in the Borough up to 2032 and will replace the District Plan once it is adopted.

Submission Local Plan

2.40 The Submission Local Plan was submitted for Examination in May 2017, and outlines that there is only limited urban capacity for further development in the Borough. The acuteness of the need for housing and the limited availability of land within urban areas for housing and employment have led the Council to conclude that exceptional circumstances exist to review Green Belt boundaries to positively plan for the Borough's development needs. To deliver the most sustainable pattern of growth, development is to be directed to the urban areas and inset villages. In addition, a new village 'Symondshyde' is proposed to the North West of Hatfield.

2.41 The Spatial Vision set out in the Submission Local Plan states that within the Green Belt designation in the Borough *'a planned release of a limited amount of land from the Green Belt will take place to meet the need for 6,200 dwellings which cannot be provided for within the existing towns and villages.'* Following on from this overall vision, the Borough-wide strategic objectives for the Local Plan include maintaining the existing settlement pattern as well as preventing coalescence of towns and villages while also allowing for the release of a limited amount of Green Belt land to ensure that its boundaries will not need to be reviewed before 2032.

2.42 The overall approach to the release of Green Belt land for development states that adopting a strategy that would restrict new housing development to sites within the Borough's existing urban areas would result in a significant shortfall of housing when measured against the Borough's Objectively Assessed Need.

2.43 Policy SP 3: Settlement Strategy and Green Belt boundaries defines the Green Belt boundaries as set out on the Policies Map. It also states that the primary focus for new development within Welwyn Hatfield will be in and around the two towns of Welwyn Garden City and Hatfield, with further development of a limited scale to be delivered around villages excluded from the Green Belt designation. Development will be restricted in rural areas within the Green Belt, to be consistent with national planning policy and the other relevant policies of the Local Plan.

2.44 Policy SADM 34: Development within the Green Belt addresses new developments proposed in the Green Belt. The policy sets out how new development utilising previously developed land and existing buildings should seek to preserve the openness of the Green Belt. It specifically addresses extensions and alternations, replacement buildings, change of use, infill development and agricultural and forestry dwellings in the Green Belt. It also identifies Major Developed Sites as locations where limited infill development or replacement buildings may be permitted. These include: the New Barnfield Resources Centre, Hatfield; Queenswood School Brookmans Park; The Royal Veterinary College, North Mymms; and Monks Walk and Knightsfield School, Welwyn Garden City.

Previous Green Belt Studies within Welwyn Hatfield

2.45 In order to inform the preparation of the Local Plan three Green Belt studies have been prepared as follows:

Stage 1 Green Belt Study (2013)

2.46 The Stage 1 study assessed the Green Belt across three planning authorities, Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council. This included an assessment of the contribution of 66 land parcels to the NPPF Green Belt purposes. This strategic level study highlighted the areas of land that contribute least towards the five Green Belt purposes. Four such areas were identified in Welwyn Hatfield including:

- WH-S1 – land at Hatfield Garden Village enclosed by north Hatfield, Coopers Green Lane (to the west) and the A1M.
- WH-S2 – land south east of Welwyn Garden City enclosed the A414.
- WH-SS1 – land west of Hatfield to the south of Wilkin's Green Lane.
- WH-SS2 land south of Welwyn Garden City, to the south of Golden Dell.

2.47 The first two of these strategic areas (WH-S1 and WH-S2) were recommended for further consideration because they were considered to contribute least to the purposes of the Green Belt.

2.48 The study concluded that release of some smaller sub-areas within these strategic areas would not significantly compromise the primary function of the Green Belt, or compromise the separation of existing settlements. It was also stated that, given the non-strategic nature of the small scale sub-areas identified, the list identified may not be exhaustive and that additional potential small scale boundary changes might be identified through more detailed assessment work.

Stage 2 Green Belt Study (2014)

2.49 The Stage 2 Study assessed a total of 67 Green Belt sites identified by the Welwyn Hatfield Borough Council Strategic Housing Land Availability Assessment (SHLAA); the Gypsy and Traveller Land Availability Assessment (GTLAA) call for sites; and the areas of Green Belt recommended for further assessment in the Stage 1 study (this included strategic sub-areas and small scale sub-areas).

2.50 The assessment considered the contribution of the identified sites to four of the NPPF Green Belt purposes, together with a local purpose (relating to maintaining the existing settlement pattern). The fifth NPPF purpose - assisting in regeneration - was not assessed in either the Stage 1 or Stage 2 study as it was not considered to be a differentiating factor between sites.

2.51 The assessment of each site records the following information:

- **Site Context** – this included a document review of the key findings from the Part 1 Study, any relevant designations and landscape features.
- **Site and Landscape Appraisal** – included a document review of Council's Landscape Sensitivity and Capacity Study and on-site appraisal to assess land use, topography, land cover, boundary review, levels of enclosure and levels of openness.
- **Green Belt Purposes Assessment** – considered the contribution each site makes towards each of the Green Belt purposes.
- **Other considerations** - identified the potential for cumulative impacts (as a result of site grouping), potential for adjustments to the boundary and identification of the possibility for cross-boundary issues.
- **Summary** – an overview of key assessment findings.

2.52 Levels of contribution were classified as either 'significant', 'partial' or 'limited or no' but no overall conclusions were drawn as it was noted that Green Belt is not required to meet all 5 purposes and that sites that make only a limited or no contribution to most or all of the purposes may still make a valuable contribution to the Green Belt. Seven sites were identified as making a limited or no contribution to all of the Green Belt purposes. A further eleven sites did not contribute significantly to any of the national purposes but made a significant contribution to the local purpose.

Stage 2 Green Belt Addendum (2016)

2.53 An addendum to the Stage 2 Green Belt Study was published by the Council in 2014. This included a Green Belt and local purposes assessment of an additional 10 sites identified as suitable through the Housing and Employment Land Availability Assessment 2016. It was carried out by the Council using the methodology developed for the Stage 2 Review.

Neighbourhood Plans

2.54 Within Welwyn Hatfield only one Neighbourhood Area has been designated. The Northaw and Cuffley Parish Council area towards the south eastern edge of the Borough was designated as a Neighbourhood Area in August 2014. The settlement of Cuffley is inset from the Green Belt, but the rest of the parish falls within the Green Belt. However, the Neighbourhood Plan is in the very early stages of being prepared and is yet to be drafted.

Neighbouring Authority Green Belt Studies

2.55 A number of the neighbouring local authorities have also undertaken Green Belt studies. The following table provides a summary of the known Green Belt studies that have been prepared.

Table 2.1: Summary of Green Belt Studies undertaken by Neighbouring Authorities.

Local Planning Authority	Summary of Green Belt Studies
North Hertfordshire District Council	**North Hertfordshire Green Belt Review (July 2016):** The Council undertook a Green Belt Review to inform the preparation of the new Local Plan which has been submitted for examination. It was highlighted that, given the development pressures which the district faced as well as the limited availability of brownfield sites or sites within North Hertfordshire settlement boundaries, areas within the Green Belt may potentially be needed to accommodate new housing and related development. Within the district there are two areas of non-Green Belt. These are the area to the west of Baldock and the area between the two bands of Green Belt around Luton and around Stevenage/Hitchin. Only the non-Green Belt area in the western part of the district was assessed in detail.

Local Planning Authority	Summary of Green Belt Studies
	The Review was split into two parts. Part One assessed the current Green Belt and potential development sites in the Green Belt, while Part Two assessed potential additions to the Green Belt. The Review concluded that there were relatively few areas of land which make a limited contribution to the purposes set out in the NPPF and no areas which make no contribution. The conclusions of the Review reflect the strategic role of the Green Belt in the district as part of the Metropolitan Green Belt in helping to contain the sprawl of Greater London through preventing the merging of towns and the urbanisation of the countryside generally. The Review noted the sub-regional role that the Green Belt in North Hertfordshire plays in relation to separating towns including Knebworth and Welwyn . Areas of land within the Green Belt to the south of the district around Stevenage, Knebworth and Welwyn Garden City as well as those around the periphery of, and between, the existing settlements of Hitchin, Letchworth and Baldock were identified as contributing most to the purposes of Green Belt. The Review assessed the Green Belt within North Hertfordshire against all of the NPPF Green Belt purposes apart from Purpose 5. This approach was taken as it was considered that the other four purposes were deemed to contribute to urban regeneration.
East Hertfordshire District Council	**East Herts Green Belt Review (September 2015)** The Council undertook a Green Belt Review as part of the evidence base to inform and support preparation of the District Plan which has been now been examined and found sound subject to modifications. The methodology for the Review did not assess land within the Green Belt against Purpose 5 because the Green Belt as a whole has a restrictive nature that limits the supply of developable land, thereby encouraging the re-use of urban land or the location of development beyond the Green Belt. Work as part of the Review identified that within East Hertfordshire the transition between the built up areas and the countryside occurs almost immediately, such as where agricultural uses abut urban areas. As such, most of the Green Belt on the periphery of each settlement is considered to perform an important contribution to the purpose of safeguarding the countryside from encroachment. The Green Belt Review identified parcels that have more contribution in Green Belt terms but did not suggest any areas where development would cause significant harm to the integrity of the Green Belt as a whole. Areas identified as having least importance in terms of fulfilling the Green Belt purposes included one parcel to the west of Hertford although it is described as lying within the boundaries of the town. The remaining parcels which lie between Hertford and Welwyn Garden City were identified in the Review as having either 'low' or 'very low' suitability as an area of search.
St Albans City and District Council	**Green Belt Review Purposes Assessment (November 2013)** The Council commissioned a Green Belt Review jointly with Dacorum Borough Council and Welwyn Hatfield Borough Council. Further Green Belt assessment work was undertaken by the Council separately to review sites and their boundaries within the Green Belt through the December 2013 and February 2014 reports. The November 2013 report assessed each parcel against the first four of the national Green Belt purposes and one additional local purpose relating to maintaining the existing settlement pattern. The review identified that much of the land to the east of the district between St Albans and Harpenden and Hatfield and Welwyn Garden City made a 'significant' or 'partial' contribution in terms of maintaining settlement patterns and safeguarding the countryside in particular. Land within St Albans and Welwyn Hatfield was identified as making a 'significant' contribution in relation to preventing the merging of the settlements of St Albans and Hatfield. The report also identified areas in districts which have been recorded as contributing least towards the Green Belt purposes. Within St Albans, five sub-areas have been identified as lying between the district and Welwyn Hatfield

Local Planning Authority	Summary of Green Belt Studies
	which contribute least towards the Green Belt purposes. Of these five sub-areas only one (which adjoins the eastern edge of St Albans) was identified as a Strategic Sub-Area. The subsequent follow-on Green Belt Reports in December 2013 and January 2014 respectively identified potential sites within the larger strategic sub-areas for potential release from the Green Belt for future development. These reports also provided an estimate of the potential development capacity of each site and ranked the sites in terms of their suitability for potential Green Belt release.
London Borough of Enfield	**Enfield Detailed Green Belt Boundary Review (April 2012)** The Review sets out the recommended changes to Enfield's Green Belt boundary to support the Core Strategy which was adopted in November 2010. The Review demonstrated that much of Enfield's outer Green Belt is strongly defensible. Weaker boundaries typically were highlighted along the inner boundary where the Green Belt meets with the more urbanised character of the Borough. In total, the initial findings recommend some 30 changes to the Borough's Green Belt boundary and effectively proposed a realignment of the Green Belt boundary that resulted in 13 gains (which resulted in an addition of 4.1 hectares) into the Green Belt designation and 17 losses (which resulted in a net loss of some 6.07 hectares) of Green Belt land. The Council is currently preparing a new Local Plan to guide development up to 2032. Green Belt assessment work to support the new Local Plan is yet to be undertaken.
Borough of Broxbourne	**Borough of Broxbourne Green Belt Topic Paper (June 2017)** The Topic Paper was prepared by the Council to support the preparation of the new Local Plan which has been submitted for examination. It sets out justification for the exceptional circumstances for the release of sites from the Green Belt. It has been demonstrated through the examination of all available options in the urban areas of the borough that it would not possible to accommodate the Borough's housing and development needs without some release of Green Belt. The Topic Paper draws on the Green Belt Review which was undertaken in 2008 and assessed the performance of all areas of Green Belt against the aim and purposes of Green Belt. The Topic Paper does not, however, repeat the previous assessment undertaken. Of those sites proposed for release from the Green Belt those which adjoin Goff's Oak (Area 4: North of Cuffley Hill; Area 5: North of Goff's Lane; Area 6: South of Goff's Lane and; Area 7: Newgate Street Road, Goff's Oak) and Cheshunt (Area 8: Rosedale Park, West Cheshunt; Area 9: Bury Green – North, Area 10: Bury Green – south and; Area 13: Park Plaza West) would have the greatest potential to impact upon the integrity of the Green Belt within Welwyn Hatfield given that they are in closest proximity.
Hertsmere Borough Council	**Hertsmere Borough Council Green Belt Assessment (Stage 1)** The report analyses Green Belt in the Study area and identifies individual strategic areas for further analysis. This approach was to include some Green Belt areas beyond the Borough's administrative boundary where the strategic areas are shared with adjoining local authorities. It also scored the strategic areas against how they contributed to the fundamental aim and purposes of the Green Belt. This did not include an assessment of Green Belt Purpose 5. The land to the north and north east of the Borough around Potters Bar which adjoins Welwyn Hatfield was recorded as having a 'moderate' or 'strong' rating in relation to the overall assessment against the Green Belt purposes. Parts of the strategic areas considered fall within Welwyn Hatfield. Only two areas towards the north and north east of the Borough around Potters Bar have been recommended to be considered for further assessment through the more detailed Stage 2 Assessment.

Other Relevant Guidance and Case Law

Planning Advisory Service Guidance

2.56 Neither the National Planning Policy framework (NPPF) nor National Planning Practice Guidance (NPPG) provides guidance on how to undertake Green Belt reviews. However, the Planning Advisory Service (PAS) has published a useful advice notes that discuss some of the key issues associated with assessing Green Belt.

2.57 The PAS Guidance[7] considers the way in which the five purpose of Green Belt should be addressed, as follows:

- **Purpose 1**: To Check the unrestricted sprawl of large built up areas – this should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.
- **Purpose 2**: To prevent neighbouring towns from merging into one another – assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.
- **Purpose 3**: To assist in safeguarding the countryside from encroachment – the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
- **Purpose 4**: Preserving the setting and special character of historic towns – this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside.
- **Purpose 5**: To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.

2.58 The PAS Guidance also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and should not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.

2.59 The guidance goes on to list the types of areas of land that might make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes:

- land partially enclosed by development, i.e. where new development would effectively be 'infill' development;
- land where development would be well contained by the landscape;
- land where harm to the qualities that contributed to the distinct identity of separate settlements would be limited; and
- a strong boundary could be created with a clear distinction between 'town' and 'country'.

2.60 The Planning Advisory Service has since updated its 'Plan Making Question and Answer' advice with regard to the assessment of Green Belt within Local Plans[8]. PAS advises that Green Belt Reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology.

[7] Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015)
[8] http://www.pas.gov.uk/pm-q-a-green-belt#Q: When should you carry out a Green Belt review?

Planning Inspectorate Local Plan Examination Reports

2.61 Since the adoption of the original version of the National Planning Policy Framework in March 2012 (subsequently updated in July 2018), there have been several important Planning Inspectorate Local Plan Examination Reports which have informed Green Belt planning and by association Metropolitan Open Land (MOL) planning. These include:

- The Inspector's preliminary conclusions (S Emerson) to Bath and North East Somerset Council (June 2012) highlighted that having an '*up-to-date and comprehensive review of the Green Belt in the district is necessary to see whether all the land so designated fulfils the Green Belt purposes*'.
- The Inspector's report (A Thickett) to Leeds City Council (September 2014) emphasised that Green Belt studies should be *'fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations*', i.e. Green Belt reviews should be 'comprehensive' rather than 'selective'.
- The Inspector's interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted several flaws in the approach to the Council's Green Belt assessment:
  - Contribution to the Green Belt purpose was not the only factor used to inform the assessment: land ownership, availability and deliverability were also considered, weighting overall Green Belt judgements against the purposes of the designation.
  - The Green Belt was divided-up in to assessment parcels inconsistently: large areas were assessed in the same way as small sites and some areas of Green Belt were not assessed.
  - Green Belt purposes 4 and 5 were not assessed.
  - The Council's two stage Green Belt assessment update involving an initial assessment of large general areas followed by smaller parcels. However, the Inspector emphasised the needs for consistency and transparency: '*This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements.*'
- The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation.
- The Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear '*how the assessment of 'importance to Green Belt' has been derived*' from assessments against the individual purposes of Green Belt and highlighted the importance of revisions to Green Belt boundaries to '*take account of the need to promote sustainable patterns of development, as required by paragraph 84 (now paragraph 138) of the NPPF [even if] such an exercise would be carried out through the SEA/SA process.*'

Planning Appeal Decisions

2.62 Since the publication of the original National Planning Policy Framework in March 2012, there have been several important planning appeal decisions that have informed general interpretation of national Green Belt policy and by association Metropolitan Open Land (MOL) policy. These include:

- Heath & Hampstead Society v Camden LBC & Vlachos (2008) concerned a proposal to demolish an existing residential building on Metropolitan Open Land and replace it with a new, larger building which represented a spatial intrusion upon the openness of the MOL but which did not intrude visually on that openness. The inspector concluded that '*while it may not be possible to demonstrate harm by reason of visual intrusion as a result of an individual – possibly very modest – proposal, the cumulative effect of a number of such proposals, each very modest in itself, could be very damaging to the essential quality of openness of the Green Belt and Metropolitan Open Land*'. Although the case related to previous policy in relation to the Green Belt as set out in Planning Policy Guidance 2 (PPG 2), this portion of the judgement

was cited in Turner v Secretary of State for Communities and Local Government & East Dorset District Council (see below) as relevant guidance in relation to the concept of openness of the Green Belt in the NPPF.

- Calverton Parish Council v Greater Nottingham Councils & others (2015) indicates that planning judgments setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent of harm' to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent':

  '*the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*'

- Turner v Secretary of State for Communities and Local Government and East Dorset District Council (2016) was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:

  '*openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs…and factors relevant to the visual impact on the aspect of openness which the Green Belt presents*'

  '*The question of visual impact is implicitly part of the concept of 'openness of the Green Belt' as a matter of the natural meaning of the language used in para. 89 (now paragraph 145) of the NPPF... There is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' and the merging of neighbouring towns…openness of aspect is a characteristic quality of the countryside, and 'safeguarding the countryside from encroachment' includes preservation of that quality of openness. The preservation of 'the setting … of historic towns' obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields.*'

  'The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there.'

2.63 The context and case law set out above has directly informed the assessment criteria, definitions of key terms and methodology used in this Green Belt Study as detailed in **Chapter 3.**

3 Methodology

Introduction

3.1 This chapter describes the approach that has been used to undertake this Green Belt Study. There is no defined approach set out in national guidance as to how Green Belt assessments should be undertaken. The approach that has been taken to this study is based on LUC's extensive experience of undertaking Green Belt assessments for over 30 authorities in different parts of the country.

3.2 This Green Belt study involved seven key tasks, as follows:

- **Task 1**: Identification of absolute environmental constraints to development.
- **Task 2:** Consideration of the strategic-scale role of the District's Green Belt in fulfilling the purposes of Green Belt policy
- **Task 3:** Assessment of the potential for washed over settlements to be inset, or retained within the Green Belt.
- **Task 4:** Identification of assessment land parcels around built up areas inset into the Green Belt (or washed over settlements with the potential to be inset into the Green Belt), and assessment of their contribution to the Green Belt purposes identified in the NPPF.
- **Task 5:** Assessment of the potential harm the release of land adjacent to inset settlements would have on the Green Belt, taking account of its contribution to Green Belt purposes, effect on the wider integrity of the Green Belt and strength of revised Green Belt boundaries.
- **Task 6:** Assessment of the Green Belt issues associated with the release of land for the development of new settlements.
- **Task 7:** Identification of the land that is 'most essential' in terms of its contribution to Green Belt purposes.

3.3 The key assessment tasks and the format of the outputs are explained in more detail below.

Task 1: Identification of absolute environmental constraints to development.

3.4 The Inspector stated in his comments at end of the Stage 2 hearing (See **Appendix 1.1**) that there is no need for this study to assess land which is constrained by other environmental or heritage constraints. This is because there is little or no potential for these areas to be proposed and approved for development. **Figure 3.1** maps absolute environmental constraints within the Borough. The absolute constraints shown on this map include:

- Registered Parks and Gardens.
- Scheduled Monuments.
- Special Area of Conservation.
- Sites of Special Scientific Interest.
- Natural Nature Reserve.
- Local Nature Reserves.
- Local Wildife Sites.
- Sites listed on the ancient woodland inventory.

3.5 Flood Zones 2 and 3 are also shown on the map, although these are not treated as absolute constraints within the context of this study. The constraints used to inform this study are consistent with those used in the Council's Housing and Economic Land Availability Assessment (HELAA, 2016).

3.6 The constraints map was used to exclude areas from further consideration in terms of potential Green Belt harm; however it should be noted that some such areas are still included within the detailed assessment parcels defined in **Task 4** (see **Chapter 6**). This is because, as can be seen from **Figure 3.1**, there are a number of constraints within the Borough, such as Local Wildlife Sites, which are relatively small. Removing them from the assessment would have led to the need for very complex and odd shaped assessment parcels which would have made the assessment overly complicated. Wherever possible, however, absolute constraints were removed from the assessment.

Task 2: Strategic-scale consideration of Green Belt role

3.7 The next key step was to understand how, at a strategic scale, land within Welwyn Hatfield contributes to the five purposes of Green Belt policy. The following text summarises the key issues that were considered in the analysis of the Green Belt's purposes both at a strategic scale in **Task 2** and in relation to the assessment of the contribution of land to the Green Belt in **Task 4**.

Assessing the contribution land makes to the Green Belt purposes

3.8 Key to any assessment of the performance of Green Belt is a clear understanding of the relationship between the settlements and the countryside, as influenced by the following common factors:

- **Development and land use** – the extent and form of existing development, and land use characteristics, which affect the degree to which land can be considered to be part of the countryside rather than an extension of the urban/settled area.
- **Location** – the position of Green Belt in relation to other distinctive pockets of Green Belt land and settlements, which can affect its role in relation to the potential expansion of settlements.
- **Separating features** – physical elements such as woodland blocks, rivers and ridges or areas of absolute constraint have a physical and visual impact on settlement-countryside relationships.
- **Connecting features** – physical elements such as roads or rail links can reduce the impact of separating features, and landform (e.g. valleys) can also draw areas together.

3.9 In addition to the five purposes of Green Belt, the NPPF also refers to two 'essential characteristics': 'openness' and 'permanence'. Both characteristics are applicable to all assessment criteria. These are defined in more detail below.

Openness

3.10 The Oxford English Dictionary defines openness as 'the quality of not being covered with buildings or trees.' However, in Green Belt planning terms, as set out in the national planning policy and associated case law, this definition is too narrow.

3.11 Two important planning appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness has having both a spatial aspect and a visual aspect.

- **Spatial openness** as a characteristic can be considered as the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt[9]. Similarly, the

[9] This point is made in the judgement in Heath & Hampstead Society v London Borough of Camden (2008).

location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to impinge on openness. Green Belt land includes many buildings which, by virtue of their form and arrangement in relation to other development, are considered not to be incompatible with the Green Belt designation. This applies most commonly to rural villages, hamlets and farmsteads, where the scale, form and density of existing development is such that it can be considered to be part of the countryside, rather than an extension of urban or built-up areas. In this case it is the test of Paragraph 140 of the NPPF that needs to be applied to determine where the threshold lies.

3.12 The NPPF also allows for 'limited infilling' and a number of types of new development (paragraph 145), the most significant being:

- buildings for agriculture or forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it; and
- infilling or redevelopment of previously developed sites (i.e. 'brownfield land'), provided it does not result in any increased impact on openness, or conflict with the purposes of including land in the Green Belt.

3.13 As a matter of law, development which is appropriate in the Green Belt such as agriculture and forestry cannot be considered to impinge on the openness of the Green Belt.

3.14 As noted by the Inspector (see **Appendix 1.1**) openness should also not be concerned about the character of the landscape, but instead it should **relate to the absence of built development and other dominant urban influences.**

- **Visual openness** is important in so far as it relates to the purposes of Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2); openness of aspect is a characteristic quality of the countryside, therefore 'safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting…of historic towns' (purpose 4) includes visual setting[10]. For example, a range of natural and man-made features – topography, vegetation, buildings and linear features such as roads and railways – can contribute to, or compromise the visual openness of the Green Belt. A key distinction, however, is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact, this does not diminish the *spatial openness* of the Green Belt.

3.15 A separate stand-alone assessment of 'openness' has not been included in this study as it is inherent to all the Green Belt purposes.

Permanence

3.16 The concept of permanence is a planning consideration rather than a physical or visual characteristic. Green Belt is a permanent planning designation. Therefore, it is recognised that there are benefits in using features which are clearly defined and which also play a physical or visual role in separating town and countryside to act as Green Belt boundaries.

NPPF Purposes

3.17 As outlined in **Chapter 2**, there are five Green Belt purposes as defined in para 134 of the NPPF. A summary of the key issues considered for each respective NPPF purpose is provided in the following section.

[10] This point is made in the judgement in Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016).

Purpose 1: To check the unrestricted sprawl of large built-up areas

3.18 Paragraph 133 of the NPPF cites the prevention of urban sprawl as the fundamental aim of Green Belt policy, so it is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas to a greater or lesser degree, but the subdivision of this fundamental aim into five stated purposes provides a basis for a more refined assessment of variations in the extent to which land performs this purpose and the way in which it does this.

3.19 Purpose 1 addresses the extent to which land performs a direct role in preventing sprawl of a large, built-up area. This requires consideration of definitions for 'large built-up area' and the term 'sprawl'.

Definition of 'large built-up area'

3.20 There is no standard definition, and no definition provided in the NPPF, for a 'large built up area'; however it is evident, as noted in **Chapter 2**, that the primary reason for the designation of the Metropolitan Green Belt was to control the sprawl from London, Luton, Dunstable, Cheshunt and Stevenage and these are defined as 'large built-up areas'. This definition is consistent with the Stage 1 and 2 Green Belt studies. None of these large built up areas lie within the Borough of Welwyn Hatfield.

Definition of 'sprawl'

3.21 There is no clear definition of what constitutes urban sprawl. The PAS guidance states in relation to Purpose 1:

> '*The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?*'

3.22 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:

> *'As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development.'*

3.23 Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the contribution land makes to preventing sprawl in a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.

Purpose 1 assessment approach

3.24 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). All of the development forms noted in the RTPI note quoted above have been considered when judging the extent to which sprawl has already occurred. Existing development includes any built structure that has an impact on openness but does not include pylons as these are features of both rural and urban environments. It also does not include development which is classed as appropriate development or not inappropriate development in the Green Belt (as defined in paras 145 and 146 of the NPPF[11]).

[11] This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be 'urban sprawl' and cannot have an 'urbanising influence'.

Purpose 2: To prevent neighbouring towns from merging into one another

3.25 The second Green Belt purpose focuses on the role of the Green Belt in preventing neighbouring towns from merging into one another.

3.26 To ensure that the study takes full account of this purpose, it is necessary to define what constitutes a 'town' within and in close proximity to the Borough and what meant by the term 'merging'.

Definition of 'towns'

3.27 As set out in paragraph 134 of the NPPF, Purpose 2 aims to 'prevent neighbouring towns merging into one another'; however the NPPF provides no definition of what constitutes a 'town'. In the Stage 1 and Stage 2 Green Belt studies, towns were defined as first tier settlements as defined in the Local Plan settlement hierarchy. A consistent approach has been used in this study. The 1st tier settlements within the County are Welwyn Garden City, Hatfield, St Albans, Hertford, Stevenage, Potters Bar and Cheshunt.

Definition of 'merging'

3.28 The Oxford English Dictionary defines 'merging' or 'merge' as to '*combine or cause to combine to form a single entity*'.

Purpose 2 assessment approach

3.29 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considers both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another.

3.30 Land that is juxtaposed between towns will make a contribution to this purpose, and the stronger the relationship between the towns, the stronger the contribution of any intervening open land will be. Physical proximity is the initial consideration but both built and natural landscape elements can act to either decrease or increase perceived separation – e.g. a direct connecting road link or shared landform may decrease perceived separation whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements can also reduce the amount of countryside between towns, particularly as perceived from connecting roads. Land that lacks a strong sense of openness, due to the extent of existing development that has occurred, will also make a weaker contribution.

Purpose 3: To assist in safeguarding the countryside from encroachment

3.31 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment. To ensure that the Study takes full account of this purpose, it is necessary to define 'safeguarding', 'countryside' and 'encroachment'.

Definition of 'safeguarding'

3.32 The Oxford English Dictionary defines 'safeguarding' or 'safeguard' as to '*protect from harm or damage with an appropriate measure*'.

Definition of 'countryside'

3.33 The Oxford English Dictionary defines 'countryside' as '*the land and scenery of a rural area*', i.e. land and scenery rural in character. General characteristics of countryside include relatively open natural, semi-natural or farmed landscapes with limited dense and urbanising development.

Definition of 'encroachment'

3.34 The Oxford English Dictionary defines 'encroachment' as '*the gradual advance beyond usual or acceptable limits'.*

3.35 In order to effectively assess the effects of encroachment on countryside or the potential implications of Green Belt release it is important to determine the extent to which Green Belt land:

- Relates to adjacent settlements and to the wider countryside.
- Contains or is influenced by urbanising land uses and features.

3.36 Urbanising land uses and features are considered to include any features that compromise the rural character of the countryside. Paragraph 145 of the NPPF and associated case law provides some useful insight into what land uses and features are considered to be appropriate in the Green Belt:

a. 'buildings for agriculture and forestry;

b. the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c. the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d. the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

e. limited infilling in villages;

f. limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g. limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'*

3.37 Appropriate development within the Green Belt cannot be considered to compromise openness or have an urbanising influence.

Purpose 3 assessment

3.38 The contribution that land makes to safeguarding the countryside from encroachment can be considered in terms of the extent to which it displays the characteristics of countryside – i.e. lack of development and land uses which are associated with countryside rather than urban land – and the extent to which it relates to the adjacent settlement and to the wider countryside.

3.39 The PAS guidance states that:

> *'The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.'*

Purpose 4: To preserve the setting and special character of historic towns

3.40 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. To ensure that the Study takes full account of this purpose, it is necessary to define the 'historic towns' and to consider what elements of a town's setting might contribute to its historic setting and distinctive character.

Definition of 'historic town'

3.41 The purpose makes specific reference to 'historic towns' not individual historical assets or smaller settlements such as villages and hamlets; therefore it is considered inappropriate to consider elements of the historic environment which do not relate to historic towns and their wider setting. This is supported by the PAS guidance which states:

> '*This purpose is generally accepted as relating to very few settlements in practice.*'

3.42 To ensure that the Study takes full account of this purpose, it is necessary to define what constitutes a 'historic town' and set out how the role of the Green Belt in preserving setting and special character was assessed. This is set out in **Chapter 4**.

Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land

3.43 Most Green Belt reviews do not assess individual parcels against purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that one parcel of land makes a higher contribution to encouraging re-use of urban land than another. The PAS guidance states:

> '*…it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.*'

3.44 In other words, it is debatable whether development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.

3.45 However, some planning inspectors' Local Plan examination reports, e.g. Cheshire East Council's Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting.

3.46 Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Ascent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – a Housing and Economic Land Availability Assessment (HELAA). Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual settlements, which can be used to calculate the proportion of available brownfield land relative to the size of each settlement.

3.47 Using these evidence bases to inform meaningful judgements on the relative contribution of discrete parcels of land to purpose 5 is dependent on the scale and form of the settlements within and around which Green Belt is defined. For example, it is harder to draw out differences in contribution between parcels around large conurbations containing merged settlements than it is land around different isolated settlements each with their own areas of brownfield land.

3.48 Given the nature of the settlement pattern within Welwyn Hatfield, it is not possible to draw a meaningful distinction between the availability of brownfield land within individual settlements. In order that the Study appropriately assesses Purpose 5 and affords it equal weighting with Purposes 1-4, an even level of contribution to Purpose 5 has been determined for all areas of Green Belt based on the average availability of brownfield land across the Borough.

3.49 Without a clear range of brownfield land proportions for each settlement across the Study area, it is not possible to calculate a tailored set of percentage ranges from which to judge contribution to Purpose 5. There is also no guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or weaker, role in encouraging urban regeneration.

3.50 The Welwyn Hatfield Brownfield Register[12] contains a record of just over 50ha of brownfield land within the Borough. This represents a relatively small amount of suitable and potentially deliverable brownfield land. The latest Annual Monitoring Report for the Borough[13] shows that levels of housing completions on brownfield land have been consistently very high for the last few years – over 90% for every year since 2007/8 with the exception of one year (2014/15). It is therefore reasonable to assume that the Green Belt in the Borough makes a **significant**

[12] Welwyn Hatfield Brownfield Register, 2017: http://www.welhat.gov.uk/brownfieldland
[13] Welwyn Hatfield Borough Council: Annual Monitoring Report 2016/17 (January 2018)

contribution to Green Belt Purpose 5 i.e. the presence of the Green Belt designation is encouraging the recycling of derelict and other urban land.

Local Purpose: To Maintain the Existing Settlement Pattern

3.51 The strategic objectives for the Submission Version of the Local Plan include an aim to maintain the existing settlement pattern, as well as preventing the coalescence of towns and villages. Objective 1 states:

> *"To provide for the borough's development needs over the plan period, in a form which maintains the existing settlement pattern, protects areas of highest environmental value, prevents coalescence of our towns and villages and releases a limited amount of land from the Green Belt to ensure that its boundaries will not need reviewing before 2032."*

3.52 This purpose was a planning objective in the 1998 Hertfordshire Structure Plan and was assessed as a local purpose in the Stage 1 and Stage 2 Green Belt Studies. These studies noted that the Green Belt maintains the existing settlement pattern by providing a range of spaces and gaps between all settlements.

3.53 The Borough has two towns as well as a number of large and small villages providing a mix of urban, suburban and rural areas. The two towns and eight of the Borough's existing villages are inset (excluded) from the Green Belt. The gaps between the Borough's towns and inset villages and the areas of countryside around these towns and villages are all currently designated as Green Belt (with the exception of one Area of Special Restraint – ASR – at Panshanger). The Borough's smaller villages and other small settlement areas are all washed over by the Green Belt. Whilst all the Borough's towns and villages are separated from each other by the Green Belt, existing gaps vary from location to location and some gaps are very narrow (and fragile) in certain instances.

3.54 The Borough's settlements perform different roles and functions effectively comprising a settlement hierarchy. The Local Plan defines the effective settlement hierarchy categorising the Borough's settlements according to their role and function and their ability to sustainably accommodate new development.

3.55 In the above context, maintaining the existing settlement pattern requires that settlements are prevented from coalescing (in part or in full) and that their role and function within the overall settlement hierarchy is not fundamentally altered or compromised.

3.56 The Council initiated consultation on the Local Plan in 2009. A key theme which emerged through the 2009 Issues and Options Consultation and which has been consistently repeated in subsequent consultations and engagement is that the Borough's communities want to protect the character of its settlements, which means maintaining them as distinctive places and preventing their coalescence. The Council do recognise however that maintaining an existing settlement pattern, is not one of the national Green Belt Purposes

3.57 In the Inspector's comments (see **Appendix 1.1**) he stated that:

> *'Given that 'maintaining the settlement pattern' is a local consideration and not one of the five Green Belt purposes it is arguable whether or not it should be given the same weight as the others but that again is a matter of rational objective judgement. It is also worth bearing in mind, when deciding which settlements and gaps to apply this consideration to that the Hertfordshire Structure Plan, when discussing 'maintaining the settlement pattern', refers to distinct and diverse communities each capable of supporting an appropriate range of housing, employment, leisure and shopping facilities.'*

3.58 Accordingly, whilst this study includes an assessment of the contribution of land to the local purpose, the assessment of harm of releasing land from the Green Belt (see **Task 5**) has **not** taken into account the local purpose. The only exception to this is where the study has sought to identify the 'most essential' Green Belt within the Borough which is explained in more detail in para 3.113. In accordance with the Inspector's guidance, less weight has been applied in this study to the local purpose than to the five national Green Belt purposes.

3.59 It was also agreed with the Council that the local purpose should only be applied to the settlements which are already inset into the Green Belt. Those within Welwyn Hatfield are set out in **Table 3.1** below but the assessment also considered relevant settlements in neighbouring authorities such as Knebworth, Codicote, Tewin, Goffs Oak which are close to the Welwyn Hatfield boundary.

3.60 **To make a contribution to the local purpose, at least one of the settlements between which an area of land is located has to be an inset settlement rather than a town**; otherwise the assessment would be an exact duplication of that applied to Purpose 2. The local purpose was considered to add to Purpose 2 only where additional settlement(s) (i.e. larger or smaller excluded villages) are affected. It is recognised that there is overlap between the two purposes in that the gaps between smaller intervening settlements which contribute to larger gaps between towns are taken into consideration in the Purpose 2 ratings; however consideration of the local purpose allows for gaps associated with smaller settlements to be reflected as a valued spatial feature in their own right.

Table 3.1: Settlements within Welwyn Hatfield considered in the assessment of the Local Purpose

Settlement type	Name
Main Town	Welwyn Garden City
Town	Hatfield
Large excluded villages	Brookmans Park, Cuffley, Welham Green and Welwyn
Small excluded villages and settlements	Digswell, Oaklands and Mardley Heath and Woolmer Green, Little Heath

Task 3: Assessment of washed over settlements

3.61 In addition to the Inspector's comments set out in **Appendix 1.1**, the Inspector identified a need for further work to assess the contribution of the 'washed over' settlements to Green Belt openness. He expressed concern that the contribution these make to the openness to the Green Belt had not been fully explored in the previous Green Belt studies. The settlement hierarchy within the submitted Local Plan identifies a network of towns, villages and hamlets in the Borough. Sixteen settlements are identified which are 'washed over' by the Green Belt (see **Figure 5.1** in **Chapter 5**).

3.62 Paragraph 140 of the NPPF states:

> *'If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt..'*

3.63 To inform Welwyn Hatfield Borough Council's decisions regarding potential to inset washed over settlements, the first step was to undertake an analysis of the contribution to Green Belt openness made by each of the 16 washed over settlements. This required consideration of a number of key factors including:

- an understanding of the general character of the settlement - in terms of its location, setting, topography, settlement form and density of built development;

- the extent of open space within the settlement- i.e. the amount, form and character of open space within the settlement and its relationship with the surrounding Green Belt; and
- the potential harm to the Green Belt (which is defined in more detail under **Task 5**).

3.64 Further information on the definition of 'openness' used in this study is set out under **Task 2** above.

3.65 Where development was considered to limit the contribution of openness to the Green Belt purposes, parcels were defined in order to facilitate an assessment of the contribution to each Green Belt purpose for the settlement, and for adjacent land. The contribution to Green Belt purposes and the potential harm resulting from the release of these settlements and adjacent land were assessed in the same way as for other land parcels, as set out in **Task 4** and **Task 5** below. The findings and further detail on the assessment of washed over settlements are set out in **Chapter 5** of this report.

Task 4: Assessment of the contribution to the Green Belt purposes

3.66 Following the review of the potential assessment of washed over settlements, a series of assessment parcels were identified next to, or in close proximity to the inset settlements (or the settlements identified in **Task 3** as having the potential to be inset). As outlined above, this excluded (wherever possible) the constraints identified in **Task 1.** Land adjacent to the potential settlements which could be inset and which was considered to clearly (without the need for detailed assessment) make a strong contribution to Green Belt was also not parcelled. However, any land not assessed at this stage was considered as part of the assessment described in **Task 5** below.

3.67 The NPPF states that when defining Green Belt boundaries, local planning authorities should '*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'* (NPPF Paragraph 139). The parcels for this Green Belt review were defined using Ordnance Survey, Mastermap Mapping and aerial imagery. The parcelling process was informed by the strategic-level analysis of the Borough's Green Belt carried out as **Task 2**, with the aim of defining parcels that reflect distinctions in the relationship between settlement and countryside, where possible bounded by recognisable features including:

- Natural features; for example, substantial watercourses and water bodies, woodland.
- Man-made features; for example, A and B roads and railway lines.

3.68 Less prominent features such as hedgerows, tree lines, streams and ditches may also be considered to be recognisable but form less permanent boundaries. Where no other suitable boundary was found, these were used to define the land parcel boundaries if they were considered to reflect a change in Green Belt contribution.

3.69 96 assessment parcels were identified, located either adjacent to inset settlements, adjacent to washed over settlements with the potential to be inset, or to incorporate (at the request of Welwyn Hatfield Borough Council) assessment of the site of the proposed new village of Symondshyde. These are shown on **Figure 3.2.**

3.70 The assessment parcels **include within them** the 67 sites reviewed in the Stage 2 Study and the 10 sites assessed in the Stage 2 Addendum (See **Figure 3.3** for the location of the Stage 2 parcels). It was concluded that identifying parcels around these sites would again lead to overly complex shaped assessment parcels. It was also agreed that a consistent framework should be used to assess all the potential areas adjacent and in close proximity to the inset settlements, and in seeking to address the comments raised by the Inspector (as set out in **Appendix 1.1**) some amendments were made to the assessment criteria.

3.71 The next key step was to analyse how each of the assessment parcels performed against each of the Green Belt purposes. This analysis was underpinned by the definitions and analysis set out in **Task 2**.

3.72 As with the strategic-level analysis of Green Belt purposes, a more detailed parcel-level assessment also requires consideration of the relationship between the assessment parcel, settlements and the countryside as influenced by the common factors of development and land use, location, separating features and connecting features. The 'essential characteristics' of 'openness' and 'permanence' are likewise relevant.

3.73 The assessment criteria used to undertake the assessment of contribution to the Green Belt purposes are broadly consistent with the assessment approach used for the Stage 2 Green Belt review, albeit the scope of the two studies differ. The Part 2 study assesses the contribution of *individual* sites to the Green Belt purposes whereas this study provides a review of the performance of the whole of the Green Belt (assessed in individual parcels) against the NPPF purposes. The criteria used in this study have also sought to take into account the comments raised by the Inspector (see **Appendix 1.1**) on the previous Green Belt studies assessment approaches.

3.74 To draw out clear variations in contribution to each Green Belt purpose a three point scale was used (consistent with the Stage 1 and Stage 2 studies) as set out in **Table 3.2.**

Table 3.2: Green Belt Contribution Ratings

Significant	Parcel makes significant contribution to Green Belt purpose
Partial Contribution	Parcel makes partial contribution to Green Belt purpose
Limited or No Contribution	Parcel makes limited or no contribution to Green Belt purpose

3.75 The following sections sets out the key questions and criteria that were used to undertake the assessment of contribution against the NPPF purposes.

Purpose 1 assessment criteria: Check the unrestricted sprawl of large built-up areas

3.76 Key questions asked in relation to purpose 1, the prevention of sprawl of large built-up areas, include:

- Does the land lie in adjacent to, or in close proximity to the large built up area?
- To what extent does the land contain existing urban sprawl?
- To what extent does the land exhibit the potential for sprawl? Does land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
- Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl?

3.77 **Table 3.3** summarises the criteria that were used for the assessment of Purpose 1.

Table 3.3: Purpose 1 assessment criteria

Purpose 1: Check the unrestricted sprawl of large built-up areas	
Development/land-use: where there is less development, the Green Belt makes a stronger contribution. **Location:** land closer to the large, built-up area generally makes a stronger contribution. **Separating features:** land that has a stronger relationship with the countryside than the settlement makes a stronger contribution. **Connecting features:** where there are no connecting features between the settlement and the countryside, land makes a stronger contribution.	
Significant *Contribution*	Land adjacent or close to the large built-up area that contains no or very limited urban development and has a strong sense of openness. It relates strongly to the wider countryside as opposed to the urban area.
Partial *Contribution*	Land adjacent or close to the large built-up that contains limited urban sprawl and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both.
***Limited* or No** *Contribution*	Land close or adjacent to the large built-up area that is already fully urbanised; or Land that is sufficiently separated or distant from a large built-up area for there not to be any potential for urban sprawl from the large built up area.

Purpose 2 assessment criteria: Prevent neighbouring towns from merging

3.78 Key questions asked in relation to purpose 2, preventing the coalescence of towns, are:

- Does the parcel lie directly between two settlements being considered under Purpose 2?
- How far apart are the towns being considered?
- Is there strong intervisibility between the towns?
- How do the gaps between smaller settlements affect the perceived gaps between towns?
- Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
- Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
- What is the overall fragility/ robustness of the gap taking into the above into account?

3.79 **Table 3.4** summarises the criteria used for the assessment of Purpose 2 in the study.

Table 3.4: Purpose 2 assessment criteria

Purpose 2: Prevent neighbouring towns from merging	
Development/land-use: less developed land will make a stronger contribution – a 'gap' which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer. **Location:** land juxtaposed between towns makes a stronger contribution. **Size:** where the gap between settlements is wide, the Green Belt makes a weaker contribution. **Separating features:** the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation. **Connecting features:** where physical features strengthen the relationship between towns, e.g. where settlements are directly linked by a major road, or have a strong visual connection, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.	
Significant *Contribution*	Land that plays a highly significant role in inhibiting the physical or visual coalescence of towns, such as narrow gaps that are visually open with few separating features.
Partial *Contribution*	Land that plays a role in inhibiting physical or visual coalescence of towns, but has (or is close to) separating features which prevent visual or physical coalescence, or has a wider gap between the towns, or a combination of the two.
***Limited* or No** *Contribution*	Land which is not located within a gap between towns, or plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns.

Purpose 3 assessment criteria: Assist in safeguarding the countryside from encroachment

3.80 Key questions asked in relation to purpose 3 include:

- To what extent does the land exhibit the characteristics of the countryside and is open?
- Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
- Does land relate more strongly to the settlement(s) or to the wider countryside?

3.81 **Table 3.5** summarises the proposed criteria that were used for the assessment of Purpose 3 in the study.

Table 3.5: Purpose 3 assessment criteria

Purpose 3: Assist in safeguarding the countryside from encroachment	
Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution. **Separating features:** land that has a stronger relationship with countryside than settlement makes a stronger contribution. **Connecting features:** an absence of physical features to link settlement and countryside means that land makes a stronger contribution.	
Significant *Contribution*	Land that contains the characteristics of open countryside and relates strongly to the wider countryside, has a sense of separation from the settlement and lacks urbanising development.
Partial *Contribution*	Land that contains the characteristics of open countryside and has limited urbanising development and relates to both the settlement and the wider countryside, or has a degree of separation from both; or Land that relates more strongly to the wider countryside than to the settlement, but openness is compromised by urbanising development within it.
Limited or No *Contribution*	Land that does not contain the characteristics of open countryside and has urbanising development that compromises openness. The land relates more strongly to the urban edge.

Purpose 4 assessment criteria: Preserve the setting and special character of historic towns

3.82 Key questions include:

- What is the relationship of the land with the historic town?
- Does the land form part of the setting and/or special character of an historic town?
- What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?

3.83 **Table 3.6** summarises the proposed criteria for the assessment of Purpose 4 in the study.

Table 3.6: Purpose 4 assessment criteria

Purpose 4: Preserve the setting and special character of historic towns	
Development/land-use: less developed land makes a stronger contribution. **Location:** an area that contains key characteristics, or important in views to or from them, makes a stronger contribution. **Separating features:** land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution. **Connecting features:** where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger.	
Significant *Contribution*	The land and its openness makes a significant contribution to the characteristics identified as contributing to Welwyn Garden City's special character or historic setting.
Partial *Contribution*	The land and is openness makes some contribution to the characteristics identified as contributing to Welwyn Garden City's special character or historic setting.
Limited or No *Contribution*	The land forms little or no part of the setting of Welwyn Garden City and does not contribute to its special character.

Local Purpose: To Maintain the Existing Settlement Pattern

3.84 The appraisal of this local purpose was undertaken using the same assessment criteria as defined for Purpose 2 but focuses on the land between the settlements outlined in paragraph 3.60. To make a contribution to the local purpose, at least one of settlements between which an area of land is located has to be a smaller inset settlement rather than a town, otherwise the assessment would be an exact duplication of that applied to Purpose 2. The inset settlements included Brookmans Park, Cuffley, Welham Green, Welwyn, Digswell, Oaklands and Mardley Heath, Woolmer Green, Little Heath, Knebworth, Codicote, Tewin and Goffs Oak.

3.85 Key questions asked include:

- Does the parcel lie directly between two settlements being considered under the local purpose? At least one of these has to be a smaller inset settlement.
- How far apart are the settlements being considered?
- Is there strong intervisibility between the settlements?
- How do the gaps between smaller settlements affect the perceived gaps between the settlements being considered under the local purpose?
- Are there any separating features between the settlements including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
- Are there any connecting features between the settlements including e.g. roads, railways which reduce the sense of separation between the settlements?
- What is the overall fragility/ robustness of the gap taking into the above into account?

3.86 **Table 3.7** summarises the criteria used for the assessment of the Local Purpose in the study.

Table 3.7: Local Purpose assessment criteria

Local Purpose: Maintain the Existing Settlement Pattern	
Development/land-use: less developed land will make a stronger contribution – a 'gap' which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer. **Location:** land juxtaposed between settlements makes a stronger contribution. **Size:** where the gap between settlements is wide, the Green Belt makes a weaker contribution. **Separating features:** the presence of physical features that separate settlements such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However, loss of such features would consequently have a greater adverse impact on settlement separation. **Connecting features:** where physical features strengthen the relationship between settlements, e.g. where settlements are directly linked by a major road, or have a strong visual connection, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.	
Significant *Contribution*	Land that plays a highly significant role in inhibiting the physical or visual coalescence of inset settlements, such as narrow gaps that are visually open with few separating features.
Partial *Contribution*	Land that plays a role in inhibiting physical or visual coalescence of inset settlements, but has (or is close to) separating features which prevent visual or physical coalescence, or has a wider gap between the inset settlements, or a combination of the two.
Limited or No *Contribution*	Land which is not located within a gap between inset settlements, or plays no role, or a very limited role in maintaining the separation between inset settlements due to the presence of significant separating features and/or significant distances between them.

Task 5: Assessment of potential harm to Green Belt purposes from release of land adjacent to inset, or potential inset, settlements

3.87 Following on from the assessment of contribution of Green Belt land to the Green Belt purposes, an assessment of the **potential harm** of release/development was undertaken.

3.88 Without a clear definition of the scale, type and design of development which will come forward for development within a specific Green Belt location, the harm assessment is based on the assumption that the openness (in Green Belt terms) of a defined area will be lost. This approach ensures a consistent approach is adopted across the study area.

3.89 Three key factors inform the assessment of Green Belt harm:

- **The contribution across the area of potential release / development to the NPPF Green Belt Purposes**.
- **The potential implications of the loss of openness within the area of potential release / development on the integrity of the wider Green Belt.** This is important as whilst a parcel may not make a significant contribution to the Green Belt in its own right, its location within the Green Belt may have the potential to affect the contribution of neighbouring Green Belt parcels and the wider integrity / strategic functioning of the Green Belt.
- **Consistency and strength of the Green Belt boundary / urban edge in relation to the potential area of Green Belt release / development.** For example, if the current Green Belt edge forms part of a consistent boundary, e.g. defined by the same readily recognisable element, and creating a new boundary would result in a more varied, less well defined edge, there could be potentially greater harm to the Green Belt.

3.90 The relationship between these three factors can vary significantly across a study area. **Professional judgement** is used to rate Green Belt harm using a 6-point scale, which adds granularity to the 3-point scale used to assess contribution to Green Belt purposes:

Very High harm

High harm

Moderate-high harm

Moderate harm

Low-moderate harm

Low harm

3.91 To assess the potential harm of releasing land for development, the following steps were followed:

- Step 1: Consideration of the contribution of the land to the NPPF purposes.
- Step 2: Review of the potential impact of release on the integrity of the remaining Green Belt, including the strength of residual Green Belt boundaries.
- Step 3: Assessment of overall harm to the Green Belt.
- Step 4: Consideration of harm resulting from alternative Green Belt development 'scenarios'.

3.92 These steps are explained in further detail below.

3.93 Site visits were made to all the assessment parcels, to verify in the field the findings of the desktop analysis.

Step 1: Consideration of the contribution ratings

3.94 The first step in assessing the potential harm of releasing land from the Green Belt involves reviewing the contribution that the parcel makes to the four assessed NPPF purposes. Release of land which makes a significant contribution to one or more NPPF purposes is likely to result in a greater level of harm. Conversely, land which makes only a weak contribution to the Green Belt purposes is likely to have lower potential for harm to occur. Consideration is also given at this stage as to whether in some instances a partial contribution across a number of Green Belt purposes might result in a higher level of harm.

Step 2: Assess potential impact of release on the integrity of the remaining Green Belt and Green Belt boundaries

3.95 The second step considers how the loss of a specific area of land could affect the strength/ integrity of the adjacent Green Belt and residual Green Belt boundaries. If Green Belt release significantly weakens the contribution of the adjacent Green Belt to the Green Belt purposes, then the harm is likely to be greater than that identified in Step 1. However, if there is no or limited impact on the contribution of the adjacent Green Belt, then the harm is likely to be less.

3.96 If the new Green Belt boundary results in a longer, more varied edge, or creates a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the wider Green Belt, but even if a strong alternative boundary can be defined, there is potential for the remaining Green Belt to be weaker – e.g. where a narrow strip of Green Belt remains between settlements or at the Green Belt fringe. Harm will be lowest where release would have no adverse impact on the adjacent Green Belt and the boundary would be strengthened, either through creation of a shorter/simpler boundary or through use of a feature that marks a stronger or more widely consistent distinction between an urban area and countryside.

3.97 With respect to purposes 1, 3 and 4, the assessment considers the harm to adjacent Green Belt by assessing whether the contribution made by that land would be weakened as a result of release of the parcel/site under assessment. For Purpose 2 it is the robustness of the gap that would remain after release that is the key consideration, rather than impact on the contribution of the adjacent Green Belt, as the latter will, up to a point, increase as the gap becomes more fragile.

3.98 The considerations taken into account when assessing the impact of release on the strength of adjacent Green Belt included:

- **Purpose 1**: Would Green Belt release create or strengthen a relationship between adjacent Green Belt and the large built-up area, either through increasing urban influence or increasing connectivity with the large built-up area?
- **Purpose 2**: How strong would the remaining settlement gap be if the Green Belt land were released? In order to answer this question consideration must be given to the size of the gap, the role of constraints and the location of separating and connecting features.
- **Purpose 3**: Would Green Belt release diminish the extent to which adjacent Green Belt could be considered countryside, either through increasing urban influence or reducing connectivity with the wider countryside?
- **Purpose 4**: Would the role of remaining Green Belt in forming a distinctive historic setting to Welwyn Garden City be diminished by loss of openness in the parcel/site under assessment?

Step 3: Assess overall Green Belt harm

3.99 By combining the considerations of step 1 and 2, professional judgement is used to reach a conclusion on the overall level of harm that would result from the release of the parcel. Where a high degree of potential harm to the Green Belt has been identified, this may relate to land which makes a significant contribution to one or more Green Belt purposes and/or its release for development would have a significant or partial impact on the integrity of the surrounding Green Belt and/or it would lead to a weak/inconsistent Green Belt boundary.

3.100 Conversely, where a low potential for harm to occur has been identified, this relates to land which does not make a strong contribution to the Green Belt purposes and/or its release would not have a significant effect on the integrity of the surrounding Green Belt and/or lead to a weakened/ inconsistent Green Belt boundary. Clear commentary is provided in the assessments (see **Appendix 6.1**) on how the judgements relating to the level of harm have been made to fully justify the ratings given. Text is only included on the consistency and strength of the Green Belt boundary where this is a key relevant issue for the parcel being assessed.

3.101 It should be noted that the size of an assessment area is not in itself a determining factor in the level of harm to Green Belt purposes. The size of a site may be a factor in the consideration of the impact of release on integrity of remaining GB, in that release of a larger area has more potential for greater impact, but this may be negated by the existence of a strong distinction between a site and the wider countryside. Similarly the release of a small site may cause significant harm in Green Belt terms if it has strong separation from an adjacent urban area. There is not a linear relationship between site size and Green Belt harm. Unlike most considerations which influence decision-making regarding development, such as effects on landscape and biodiversity, Green Belt harm assessment is concerned with impact on a spatial planning designation rather than on the physical environment. It is the relationship an area has with settlement and countryside that is the key factor, rather than extent of the physical area affected.

Step 4: Consider harm resulting from alternative release 'scenarios'

3.102 Where there are variations in the three factors influencing Green Belt harm across an area/site it is then necessary to consider how harm might vary within a parcel. A key element in the assessment of harm was therefore the identification of different development scenarios to reflect any variations in harm that might result from either constraining development to a smaller area than the parcel as a whole or, reflecting the need to consider cumulative impact, from expanding development to adjacent areas.

3.103 Development scenarios are defined to reflect assessed variations in harm to Green Belt purposes that would result from release of land within each parcel. They therefore encompass all Stage 2 sites but do not present separate assessments of each if harm is not found to vary significantly. Thus one or several sites might fall within a larger harm scenario, but conversely a single site might be split across more than scenario to reflect variations in harm within it. The scenarios note the names of any Stage 2 sites, or housing allocations that fall within them.

3.104 Cumulative scenarios are identified to consider the effects of release of adjacent sites or parcels, but only where harm would be different to that identified for constituent sites/parcels.

3.105 Where some parcels/scenarios are found to have lower harm ratings, this does not mean that they should be released/inset into the Green Belt as there may be other reasons why they are not appropriate for development – i.e. it may not be a sustainable location for development.

3.106 Assessments for alternative harm scenarios do not repeat the information provided in the assessment of harm for release of the parcel as a whole but provide only the information needed to justify any difference in harm rating. The former should always therefore be read alongside the latter.

3.107 The findings of the assessment of harm are set out in **Chapter 7** with the detailed parcel write ups included in **Appendix 6.1.**

3.108 In some cases, the Stage 2 sites are very small (e.g. OMH1, OMH2 etc.) and are located between existing built development. Paragraph 145 of the NPPF allows for limited infilling, or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings). This is only in cases where the development would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Some of the infill sites or developed sites considered in this study may fit within this category of 'appropriate use' and their development may not compromise the sense of openness or the NPPF purposes and as such they may not require release from the Green Belt (i.e. they could remain washed over). This has not, however, been assessed in this study. This study has only assessed sites in terms of the potential harm to the Green Belt if they were released (i.e. inset into the Green Belt).

Task 6: Assessment of potential harm to Green Belt purposes from release of land for creation of new settlements

3.109 In the Inspector's comments at the end of the Stage 2 hearings, he suggested that if the quantum of development required (to deliver the Council's housing targets) can't be met adjacent to urban areas, the Council should assess other locations that are large enough to accommodate a new settlement (i.e. of at least 1,000 homes).

3.110 There are clearly a number of factors that should be considered when identifying potentially suitable locations for new settlements including: sustainability factors, availability of sites (i.e. whether they are developable and deliverable), links to key public transport corridors and service provision and the overall fit with the Council's proposed growth strategy. As all the existing inset areas within Welwyn Hatfield are surrounded by Green Belt, this is also an important consideration within the Borough.

3.111 Having assessed the washed-over settlements and land adjacent to the inset edges, an assessment was undertaken of the contribution that all remaining land within the Borough makes to the Green Belt purposes. This sets out the variation in performance of Green Belt land away from the inset areas and gives an indication of which areas make a stronger or weaker contribution to the NPPF Green Belt purposes and hence may be more or less suitable in Green Belt terms as a new settlement location. **Chapter 8** of this report sets out the findings of this assessment.

Task 7: Identification of the land that is most essential in terms of its contribution to Green Belt purposes

3.112 As noted in **Chapter 1**, the Inspector at the Stage 2 hearing sessions asked the Council to submit evidence to the examination identifying which parts of the Borough's Green Belt are essential to its function, and therefore critical to retain. Ultimately it is difficult to state in absolute terms that any Green Belt is critical enough to deemed to be 'essential' without setting its functional value alongside the demand/need case and sustainability/environmental considerations; however it is possible to make relative judgements as to which land is '*most* essential'. The loss of openness of any areas deemed 'most essential' would clearly constitute a failure of the Green Belt to achieve its stated functions.

3.113 Green Belt land anywhere within the Borough could potentially be deemed 'most essential', so this judgement needs to consider the findings of all of the preceding elements of the assessment: the scenario-level findings of the harm assessment, the findings of the assessments of washed over settlements; the 'outer' areas of Green Belt that were considered for potential new settlement locations; and the strategic analysis that informed all of these. Areas of 'most essential' Green Belt may also subdivide assessment parcels, to reflect the variations in harm identified at the development scenario level.

3.114 As Purpose 5, encouraging the re-use of urban sites, was not applied at a parcel-level, it did not assist with this relative assessment. The 'local purpose' of maintaining the existing settlement pattern was taken into consideration, but with less weight applied than the national purposes identified in the NPPF, as explained in the paragraphs below.

3.115 In our judgement, for land to be considered 'most essential' there must be a '**very high**' level of harm associated with its release.

3.116 Areas of 'very high harm' were identified where there was:

- A *particularly* significant contribution to a single one of the first four national Green Belt purposes. A particularly significant contribution to the local purpose would not, in isolation, be sufficient to warrant 'high harm' and 'most essential' status.
- A significant contribution to more than one of the first four national Green Belt purposes. Land making a significant contribution to the local purpose and to one of the national purposes was not necessarily judged as 'high harm' or 'most essential'; however a significant

contribution to the local purpose was considered enough to bolster the contribution of land to Purpose 2 (the separation of towns) from 'partial' to 'significant, reflecting the overlap between these two purposes. Therefore land making a 'partial' contribution to Purpose 2 and a 'significant' contribution to the local purpose and one other national purpose was judged to cause 'very high harm and be 'most essential'.

- A particularly strong impact on the defined Green Belt boundary, or on the integrity of the wider Green Belt.

3.117 The findings of the assessment of 'most essential' Green Belt are set out in **Chapter 9.**

4 Strategic Assessment of Green Belt Role

Introduction

4.1 This chapter sets out the findings of the strategic consideration of the role of Green Belt in the Borough (as outlined in **Task 2** in **Chapter 3**).

4.2 The strategic scale assessment considers the key factors affecting the relationships between settlement and countryside, the essential characteristics of Green Belt and the strategic role played by land within the Borough in meeting the purposes of Green Belt designation. This assessment has helped to define the assessment criteria set out in Task 3 and the more detailed assessments of contribution and harm in **Chapters 5, 6 and 7**.

Relationship between Settlement and Countryside

Development and Land Use

4.3 As shown on **Figure 4.1**, there is a strong north-south orientation to urban development within the Borough, reflecting the pattern of transport routes to/from London. Much of the settlement in the Borough lies close to the Great North Road (A1000), the A1M and the Great Northern Route (East Coast Main Line). There is also an east-west axis connecting some of the larger settlements that lie on different routes out from London, passing through Hatfield and Welwyn Garden City along the A1057 to St Albans and along the A414/B1000 to Hertford.

Location of Green Belt

4.4 The Green Belt extends beyond the Borough boundary in all directions, other than at the far north western corner where for a very short distance close to Ayot St Lawrence the Borough boundary is also the Green Belt edge. There are no sizeable settlements within the Borough that are not closely contained by Green Belt land – only small areas are safeguarded for future development – and there are no urban areas outside but near the Borough that are not likewise contained.

Separating and Connecting Features

4.5 River valleys play an important role in the spatial pattern of development. In the wider landscape they are commonly a focus for older settlements (such as Hertford), with connecting routes along them, but within the Borough their principal role is as boundary features. The valley of the River Lea runs west-east between Welwyn Garden City and Hatfield, and that of the River Mimram defines the northern edge of Welwyn Garden City. Despite proximity to urban areas, the linear form, topography, watercourses and tree cover associated with these valleys emphasises their distinction from the urban edges.

4.6 The typical expansion of settlements in a north-south direction is historically associated with the orientation of the principal road and rail routes, but in addition to performing a connecting role these features in some instances also function as barriers to east-west development. The A1M in particular, as a more modern route which is generally detached from settlements, and screened by tree cover, plays more of a separating than connecting role.

4.7 Woodlands and parklands are commonly designated, e.g. as local wildlife sites or registered parklands, giving them a role as barriers to development, and even unprotected woodlands still play a role in perceived settlement separation, through the visual containment that they provide. The wooded parklands around Hatfield House dictate the eastern extent of Hatfield, and woodlands also contribute significantly to containment of the settlement of Oaklands and Mardley Heath, and of Welwyn Garden City.

4.8 There are no particularly dominant areas of high ground in the Borough, but tributary valleys to the west of Cuffley Brook create some distinctive landforms between which smaller settlements are focused, notably Northaw, Newgate Street, whilst the village of Essendon similarly lies on a ridge between tributaries of the River Lea. Landform emphasises the distinction between these elevated settlements and surrounding open countryside.

Essential Characteristics

Openness

4.9 All sizeable areas of urban development are excluded from the Green Belt designation (i.e. inset) as shown on **Figure 4.1**, but a number of villages have urbanising characteristics that warrant further investigation, as requested by the Inspector. These settlements, which spatially are scattered throughout the Borough, are listed and assessed in **Chapter 5** below.

4.10 There is also a triangle of land between Welwyn, Oaklands and Mardley Heath and Codicote, straddling the Borough boundary, that is characterised by frequent residential development, albeit mostly lower density than is typically the case in an inset settlement.

4.11 Towards the southern edge of the Borough, between Potters Bar and Brookmans Park, the Royal Veterinary College constitutes a sizeable development within the Green Belt.

Permanence

4.12 The inset edges of Green Belt within Welwyn Hatfield are typically defined by the limits of residential development, sometime reinforced by distinct natural features such as woodlands, hedgerows or landform changes, or marked by roads or railway lines.

4.13 In a few locations linear sprawl extending out from an inset settlement remains within the Green Belt even though it doesn't mark a clear distinction between settlement and countryside – e.g. along the Great North Road on the southern edge of Brookmans Park.

Purpose 1: Check the unrestricted sprawl of large built-up areas

4.14 Welwyn Hatfield contains no settlements defined as 'large, built-up areas' but it is necessary to consider whether any land within the Borough contributes to preventing the sprawl of nearby large, built-up areas. These include London, Stevenage and Cheshunt (which is contiguous with Enfield).

London

4.15 The underlying purpose of the Metropolitan Green Belt is to prevent the spread of London, so at a fundamental strategic level most Green Belt can be considered to contribute to this purpose. However, the subdivision of Green Belt purpose into five purposes allows for a more refined analysis in which different parts of the Green Belt can be found to contribute to differing extents to each of these component purposes.

4.16 This refinement allows us to distinguish between land that has a direct relationship with London, or the other nearby large built-up areas, and land which, whilst contributing indirectly to prevention of sprawl, does so by preventing other settlements from spreading, and/or by preventing the loss of countryside.

4.17 London is separated from Welwyn Hatfield by Green Belt land in the London Borough of Enfield and in Hertsmere District. The M25 forms a clear feature separating the urban edge of Enfield from Welwyn Hatfield, and land both to the south and north of the motorway separates the Borough from the metropolitan edge at Barnet. Development in Welwyn Hatfield would have clear separation from London, and would relate more strongly to smaller settlements, such as Potters Bar, and so would not be considered directly as sprawl of the large built-up area of London.

Cheshunt

4.18 There are narrow gaps between Cuffley, Goffs Oak and Cheshunt. A railway line forms an edge to main body of Cuffley, and although a small area of development extends east of this, weakening its integrity, the Borough boundary marks the settlement extent. Other land in Welwyn Hatfield does not extend east beyond this inset edge, and Cuffley Brook forms a distinct edge slightly to the east of this, so any development in the Borough would clearly relate to Cuffley rather than Goffs Oak or Cheshunt.

4.19 Goffs Oak is contiguous with Cheshunt along Goffs Lane and as such could be considered to form part of the large built-up area. This means that the gap between Goffs Oak and Cuffley does contribute to Purpose 1, but doesn't significantly increase the contribution of land to the east of the railway line. Developed higher ground in Cuffley is already visible from Goffs Oak.

Stevenage

4.20 The inset village of Knebworth lies between Stevenage and inset development in Welwyn Hatfield. The railway line forms a strong southern boundary to Stevenage, so any development within the Borough would relate to Woolmer Green or Knebworth rather than the large built-up area.

Purpose 2: Prevent neighbouring towns from merging

4.21 To understand the strategic contribution of land to this purpose it is necessary to consider the extent of separation between towns, taking into account the role of landscape elements, natural or manmade, including intervening smaller settlements, in increasing or decreasing the perceived separation. The fragile gaps between the main towns are shown on **Figure 4.1.**

Welwyn Garden City - Hatfield

4.22 The settlement gap between these two towns is only just over 1km. The valley of the River Lea forms the gap, with the urban edges stopping on higher ground. The floodplain provides some constraint, and Creswick Plantation local wildlife site, but there is insufficient constrained land to preserve a significant gap. The railway, A1000 and A6129 form strong connections between the towns, and the valley landform gives some intervisibility. Stanborough reduces the perceived separation, occupying land alongside the Great North Road down to the floodplain, leaving only a narrow gap to similar linear development along the Great North Road on the other side of the valley, separated from Welwyn Garden City only by the A1M. This gap is fragile, with openness in the valley playing the key role in preventing coalescence.

Stevenage – Welwyn Garden City

4.23 Stevenage lies over 6km north of Welwyn Garden City, but five inset villages – Welwyn, Digswell, Oaklands and Mardley Heath, Woolmer Green and Knebworth – occupy land in between the two towns. The gaps between these inset areas range from 1km to 350m.

4.24 Tree cover and a railway line along the edge of Stevenage, further tree over within the fringes of the town and along the B197, and rising landform to the south combine to maintain a relatively strong distinction between Knebworth and Stevenage, despite the physical gap being only 500m.

4.25 There is more fragile separation between Knebworth and Woolmer Green, with a nursing home lying within the 350m gap between the inset areas, although tree cover maintains visual separation along the connecting B197. To the south of this along the B197, only the railway line provides separation between Woolmer Green and Oaklands and Mardley Heath.

4.26 Less than 700m separates the inset areas of Oaklands and Mardley Heath and Welwyn, again along the B197. The A1M and associated tree belts form a strong separating feature, but the perceived separation is reduced by intervening washed-over residential development, National Grid infrastructure and a caravan site. To the south-east approximately 1km separates Oaklands and Mardley Heath from Digswell, but strongly defined valley topography, extensive tree cover and an absence of direct connecting roads mean that this gap is perceived as being much more substantial. The well-treed hill that occupies the space between Welwyn to the west, Welwyn

Garden City to the south, Oaklands and Mardley Heath to the north and Digswell to the east plays an important role as a setting for the adjacent settlements.

4.27 Welwyn and Welwyn Garden City are separated by the A1M, with associated linear tree belts, and by Green Belt that contains the adjacent buildings of two schools, with associated playing fields. The nearest inset edges are less than 400m apart, but the perceived separation is increased by the absence of any direct connecting routes across the A1M: the A1000 runs east from Welwyn along the valley of the River Mimram before turning south at Digswell. Digswell is only 170m from the inset edge of Welwyn Garden City, and the intervening area, although including the river corridor and associated vegetation, is largely occupied by built development.

Welwyn Garden City – Hertford

4.28 The inset edges of these towns are a little over 3km apart, but almost all of the land forming this gap lies within East Hertfordshire District. The Green Belt within Welwyn Hatfield is closely associated with the inset settlement edge of Welwyn Garden City but its role in settlement separation is partially negated by a sizeable East Hertfordshire site allocation (EWEL1) at south east Welwyn Garden City .

St Albans – Hatfield

4.29 At its closest point, along the A1057, less than 1.5km separates the inset edges of Hatfield and St Albans, and the perceived gap is further reduced by intervening washed over development with urbanising characteristics at Smallford. There are no strong separating features, so this is considered to be a fragile gap.

4.30 The gap widens slightly to the north but is still narrow, and several minor roads link St Albans to the industrial north western edge of Hatfield. Woodland blocks and belt provide some visual screening, but the visual prominence of the large commercial buildings acts against this to reduce perceived separation.

Harpenden – Welwyn Garden City

4.31 Harpenden and Welwyn Garden City are over 7km apart, linked by the B653. The inset village of Wheathampstead lies in between, and the washed over village of Stanborough has urbanising characteristics, but these are still over 4km apart. Extensive parkland around Brocket Hall, a registered parkland, provides a barrier alongside the B653, so this settlement gap is considered to be relatively strong.

Hatfield – Potters Bar

4.32 A gap of over 4km separates Hatfield from Potters Bar, but two major routes joining the towns, the railway line and the Great North Road, pass by the intervening inset settlements of Welham Green, Brookmans Park and Little Heath. Welham Green almost adjoins Hatfield, Little Heath is contiguous with Potters Bar, there is less than 650m separating Welham Green and Brookmans Park and only 1km between the nearest edges of Brookmans Park and Potters Bar or Little Heath. Although the size of the overall settlement gap, and extent of open land between the two towns away from the main connecting routes, precludes the majority of this area from being considered fragile, the gaps between intervening inset settlements are important (see **Local Purpose** below).

Cheshunt – Potters Bar

4.33 Cheshunt and Potters Bar are about 6.5km apart, but outside of the Borough there are narrow gaps between Cuffley, Goffs Oak and Cheshunt, so the principal separation is between Cuffley and Potters Bar, which are around 3km apart. The washed over village of Northaw lies in between the two, but extensive woodlands help to separate it from Potters Bar. A broad valley separates Northaw from Cuffley, the visual openness of which makes this gap more vulnerable to encroachment (see **Local Purpose** below).

Purpose 3: Assist in safeguarding the countryside from encroachment

4.34 To understand the strategic contribution of land to this purpose we need to consider general patterns in terms of the extent to which land displays the characteristics of countryside – i.e. lack of development and land uses which are associated with countryside rather than urban land – and the extent to which it relates to settlements and to the wider countryside.

4.35 For the most part land within the Borough outside of inset settlements is open and rural, and therefore contributes to this purpose. Exceptions to this where contribution is lower are fairly isolated but are mostly locations within or close to the main north-south development corridor, primarily near to the A1M or the Great North Road (A1000), where development within the Green Belt has an impact on countryside character, land has a stronger relationship with inset areas, and roads or rail may create separation from the wider countryside.

4.36 Open land which has a distinct character creating a strong distinction between urbanising development and the countryside (i.e. the river valleys, hills, parkland and woodlands noted in paragraphs 4.5-4.8 above) is considered to make the highest contribution to this purpose. Open land forming a distinctive urban edge is shown on **Figure 4.1**.

4.37 Away from the main north-south corridor, to the east of Hatfield and towards the north-western edge of the Borough, there are sizeable areas of countryside that lack any significant relationship with inset settlements, but there is a spread of villages across the Borough that have relatively dense development and which therefore make a weaker contribution to this purpose. These are considered in **Chapter 5** below.

Purpose 4: Preserve the setting and special character of historic towns

4.38 The heritage assets considered in the Stage 2 Green Belt Study included Conservation Areas, Historic Parks and Gardens and Scheduled Ancient Monuments. Whilst Scheduled Monuments and Registered Parks and Gardens etc. are historic assets, for the purpose of this Study they are not considered to constitute historic 'towns' in line with Purpose 4. Only Welwyn Garden City (as designed by Ebeneezer Howard) is considered within this assessment to form an historic town. As set out in para 23 of the Welwyn Garden City Conservation Appraisal:

> *'On 11 June 1920 Louis de Soissons, architect and town planner for Welwyn Garden City from 1920 until 1962, produced the first Master Plan of Welwyn Garden City. The formal civic and business centre with Parkway and Howardsgate contrasted with the informal residential sectors. The agricultural belt was relatively small and the company, Welwyn Garden City Ltd., was anxious to buy more land in order to secure an open countryside setting as well as to realise Howard's vision of the symbiotic relationship between town and productive farmland near at hand.'*

4.39 Welwyn Garden City's historic significance is as one or the earliest of Britain's planned 'garden cities', a product of the movement initiated in 1898 by Sir Ebenezer Howard. Key to the concept of the garden city was low density development offering a combination of residential and employment areas in close association with agricultural land. The masterplan for Welwyn Garden City, first developed in 1920, did not involve significant overlap between rural and urban areas, with one merging into the other, but rather a low density settlement pattern with a strong element of tree cover, wide central boulevards and grass-verged roads to promote a sense of green space. It is not therefore possible to identify specific areas of open land within the Green Belt that are key particular characteristics of the planned town, and there is no intervisibility between the historic core (the south-western area developed before WW2) and the surrounding countryside, but some value with respect to Green Belt Purpose 4 can be attached to the presence of land that constitutes an open, undeveloped setting.

4.40 The masterplan identified an agricultural zone within the area of land purchased for the development of the town, and whilst some of this has subsequently been developed other parts remain open (although the term 'agricultural' was used, these areas are largely wooded). Beyond this the town lies on a plateau contained to the south-west by the valley of the River Lea and to the north by the valley of the River Mimram, so these distinctive landscape elements were clearly conceived as lying beyond the bounds of the new settlement. Undeveloped land close to the historic south-western core of Welwyn Garden City is considered to make the strongest contribution to preserving the town's historic setting. The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. Land considered important to the historic setting of Welwyn Garden City is shown on **Figure 4.1.**

Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land

4.41 As noted in the methodology (**Chapter 3**), an even level of contribution to Purpose 5 has been determined for all areas of Green Belt.

Local Purpose: To Maintain the Existing Settlement Pattern

4.42 As discussed, there are narrow gaps between many of the Borough's smaller inset settlements, or between those smaller settlements and towns. This is particularly the case in the north-south corridor along which the A1M, the mainline railway and the A1000 pass. However, where smaller settlements are already very close together, the separating value of adjacent open land may to some degree be diminished as loss of openness would not further narrow that smallest gap, and where strong separating features form the key element in a narrow gap the separating role of any open land that also lies between them might likewise be diminished. Elements of the gaps between Woolmer Green and Oaklands and Mardley Heath (separated by the railway), between Welwyn and Welwyn Garden City (separated by the A1M) and between Hatfield and Welham Green (which almost adjoin at the A1001) fall into this category.

4.43 Where open land plays a stronger role in local settlement separation, such as between Knebworth and Woolmer Green, between Welwyn Garden City and Digswell, between Welham Green and Brookmans Park, between Brookmans Park and Potters Bar, between Northaw and Cuffley, and in the high ground that separates Oaklands and Mardley Heath, Welwyn, Welwyn Garden City and Digswell, the contribution to this local purpose is higher. The fragile gaps between the settlements considered in the Local Purpose assessment are shown on **Figure 4.1.**

5 Assessment of Washed Over Settlements

Introduction

5.1 This chapter sets out the findings of the assessment of washed over settlements (as outlined in **Task 3** in **Chapter 3**).

5.2 The settlement hierarchy within the submitted Local Plan identifies a network of towns, villages and hamlets in the Borough. Sixteen settlements are identified which are 'washed over' by the Green Belt as set out in **Figure 5.1.**

5.3 An assessment was undertaken of the contribution of these settlements to Green Belt openness. Where limited contribution to Green Belt openness was identified, a more detailed assessment of the contribution to the Green Belt purposes of land in and around these settlements was undertaken. This included defining parcels which were then assessed in more detail as part of the main stage of the Green Belt Study. This looked at the potential contribution of land within and around these settlements to the Green Belt Purposes and the potential harm if they were to be released.

5.4 Paragraph 140 of the NPPF states:

> *'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.'*

5.5 As outlined in **Chapter 3**, a key test is to identify whether the open character of the washed over settlements makes an important contribution to the *openness* of the Green Belt. Taking account of relevant case law and the Inspector's comments on the Stage 1 and 2 Green Belt assessments, it was necessary to define 'openness' as set out in para 3.9-3.12 of **Chapter 3**. It is this definition of openness that was used to inform this assessment.

5.6 As outlined in para 140 of the NPPF, the key test to assess is whether the open character of the washed over settlement makes an important contribution to the openness of the Green Belt. This requires consideration of the amount, form and character of development and open spaces within the settlement and its relationship with the surrounding Green Belt. The detailed assessment tables are provided in **Appendix 5.1** and include the following:

- **Aerial and OS map of the washed over settlements** - the OS map also includes the key absolute and non-absolute constraints to development.
- **Description** – overview of the general character of the settlement in terms of its location, setting, topography, settlement form and density of built development.
- **Open space** - description of the amount, form and character of open space within the settlement and its relationship with the surrounding Green Belt.
- **Comments on contribution and harm** – summarising the findings of the assessment of harm for the relevant parcels that cover the washed over settlements for which it was concluded that further assessment should be undertaken.
- **Summary** – sets out whether the level of openness within the settlement warrants:
    a) **consideration for insetting** (i.e. because the settlement was judged not to have any significant degree of openness, or where it was not clear cut and a more detailed analysis of the contribution to the Green Belt purposes and harm was required).

b) **retention as a washed over settlement** (i.e. because the degree of openness of the settlement is high).

- Photographs of the washed over settlements – illustrating the degree of openness.

Summary of Findings

5.7 **Table 5.1** provides a summary of the findings of the assessments of openness and, where applicable, contribution to Green Belt purposes and harm from release. The full assessment of openness is presented in **Appendix 5.1**, whilst the findings of the detailed assessments of contribution and harm are set out in **Chapters 6 and 7** and **Appendix 6.1** of this report. Maps showing the inset Green Belt boundaries that would be associated with each potential development scenario are set out in **Appendix 5.2**.

5.8 This assessment does not specifically recommend the insetting of settlements. If a settlement is judged not to have any significant degree of openness there may be other reasons why the Council may not wish to inset it, e.g. if there is little or no potential for further development, or if non- Green Belt issues have a bearing.

Table 5.1: Summary of Findings of Assessment of Washed Over Settlements

<table>
<tr><th>Washed Over Settlement</th><th>Analysis Results</th></tr>
<tr><td>Lemsford</td><td>
The initial analysis of openness (Appendix 5.1) identified this settlement as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with release.
Parcel 33 (land north of the main road) and Parcel 34 (land north of the main road) were defined to assess the contribution of the settlement, and harm from release (Appendix 6.1). Adjacent land was assessed as Parcel 32 (land to the north east), Parcel 35 (land to the south and east) and Parcel 36 (land to the west, including church and school).
The following development scenarios were assessed (inset Green Belt boundaries which are shown in Appendix 5.2):
<table>
<tr><th>Scenario Code</th><th>Release Scenario</th><th>Harm</th></tr>
<tr><td>P34</td><td>Village to south of main road</td><td>Moderate – Low</td></tr>
<tr><td>P33 / 34</td><td>Village to south and north of main road</td><td>Moderate</td></tr>
<tr><td>P33 / P34 / P35a</td><td>Village including field to the south</td><td>Moderate</td></tr>
<tr><td>P33 / P34 / P35 / P36</td><td>Village including church and school area, and/or the wooded riverside area to the south-east</td><td>High</td></tr>
<tr><td>P32 / P33 / P34</td><td>Village including land to the north-east sloping up to the A1(M)</td><td>Very High</td></tr>
</table>
</td></tr>
</table>

Washed Over Settlement	Analysis Results
Newgate Street	The initial analysis of openness (**Appendix 5.1**) identified this settlement as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with release. Parcel 93 was defined to assess the contribution of the settlement, and harm from release (**Appendix 6.1)**. Adjacent land was assessed as Parcel 92 (land to the north east), Parcel 91 (land to the south east), Parcel 94 (land to the south west) and Parcel 95 (land to the north west). The following development scenarios were assessed (inset Green Belt boundaries for which are shown in **Appendix 5.2**): **Scenario Code** / **Release Scenario** / **Harm** P93 / Main body of village / Moderate P93 / P94a / Village + north western section of P94 / Moderate P92a / P93 / P94a / Village + western section of P92 / Moderate - High P91 / P92 / P93/ P94 / P95 / Village + any other surrounding land / High
Ayot St Lawrence	**Retain as washed over settlement** as the open character of the settlement contributes to the openness of the Green Belt.
Ayot St Peter	**Retain as washed over settlement** as the open character of the settlement contributes to the openness of the Green Belt.
Ayot Green	**Retain as washed over settlement** as the open character of the settlement contributes to the openness of the Green Belt.
Burnham Green (part – remaining area lies in neighbouring East Herts District)	**Retain as washed over settlement** as release of this settlement would need to be in conjunction with the release of the section of the settlement in the neighbouring district for which there were no plans to inset.

Washed Over Settlement	Analysis Results
Stanborough	The initial analysis of openness (**Appendix 5.1**) identified this settlement as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with release. Parcel 39 (the main body of the village) was defined to assess the contribution of the settlement, and harm from release (**Appendix 6.1)**. Dwellings along the Great North Road to the north of the River Lea, along with open land to the west, were assessed as Parcel 30 and other adjacent open land was assessed as Parcel 38 (land between houses along the Great North Road and Brocket Road), Parcel 37 (land to the north west) and Parcel 40 (land to the west). The following development scenarios were assessed (inset Green Belt boundaries for which are shown in **Appendix 5.2**):

Scenario Code	Release Scenario	Harm
P39	Main body of village	Low
P30a / P39	Village + development along Great North Road to north of River Lea	Moderate
P30a / P38 / P39	Village including land between Great North Road and Brocket Road	Moderate
P30 / P38 / P39	Village + development along Great North Road to north of River Lea and open land to the west of it	Moderate – High
P37 / P38 / P39	Village including to the north west (on the east side of Brocket Road)	High
P39 / P40	Village including land to the west	Very High

Mill Green	**Retain as washed over settlement** as the open character of the settlement contributes to the openness of the Green Belt.

<table>
<tr><th>Washed Over Settlement</th><th>Analysis Results</th></tr>
<tr><td>Essendon</td><td>
The initial analysis of openness (Appendix 5.1) identified this settlement as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with release.
Parcel 51 (the main body of the village) and Parcel 52 (land west of High Road) were defined to assess the contribution of the settlement, and harm from release (Appendix 6.1). Adjacent land was assessed as Parcel 49 (land to the north west) and Parcel 50 (land to the north east).
The following development scenarios were assessed (inset Green Belt boundaries for which are shown in Appendix 5.2):
<table>
<tr><th>Scenario Code</th><th>Release Scenario</th><th>Harm</th></tr>
<tr><td>P51</td><td>Main body of village</td><td>Moderate – Low</td></tr>
<tr><td>P51 / P52</td><td>Village + land to west of High Road</td><td>Moderate – High</td></tr>
<tr><td>P50a / P52</td><td>Village + field to the north (east of B158)</td><td>Moderate – High</td></tr>
<tr><td>P49 / P50 / P51</td><td>Village + land to the north east or north west</td><td>High</td></tr>
</table>
</td></tr>
<tr><td>Northaw</td><td>
The initial analysis of openness (Appendix 5.1) identified this settlement as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with release.
Parcel 85 was defined to assess the contribution of the settlement, and harm from release (Appendix 6.1). Surrounding land was assessed as Parcel 84.
The following development scenarios were assessed (inset Green Belt boundaries for which are shown in Appendix 5.2):
<table>
<tr><th>Scenario Code</th><th>Release Scenario</th><th>Harm</th></tr>
<tr><td>P85</td><td>The village</td><td>Moderate – Low</td></tr>
<tr><td>P84 / P85</td><td>Adjacent land to east, south or west</td><td>High</td></tr>
</table>
</td></tr>
<tr><td>Bullens Green (part – remaining area lies in neighbouring St Albans District)</td><td>Retain as washed over settlement as release of this settlement would need to be in conjunction with the release of the section of the settlement in the neighbouring district for which there were no plans to inset.</td></tr>
<tr><td>Wild Hill</td><td>Retain as washed over settlement as the open character of the settlement contributes to the openness of the Green Belt.</td></tr>
</table>

Washed Over Settlement	Analysis Results
Woodside	**Retain as washed over settlement** as the open character of the settlement contributes to the openness of the Green Belt.
Bell Bar	The initial analysis of openness (**Appendix 5.1**) identified this settlement as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with release. Parcel 68 (the village south of the Great North Road) and Parcel 70 (development north of the Great North Road) were defined to assess the contribution of the settlement, and harm from release (**Appendix 6.1)**. Adjacent land was assessed as Parcel 67 (land to the west of P68), Parcel 72 (field to the east of P68), Parcel P66 (land to the south of the village), Parcel 69 (land to the west of P70) and Parcel 71 (field to the east of P70). The following development scenarios were assessed (inset Green Belt boundaries for which are shown in **Appendix 5.2**):

Scenario Code	Release Scenario	Harm
P68	Village to south of Great North Road	Moderate – Low
P68 / P70	Village including north of Great North Road	Moderate
P68 / P7 / P72	Village + field east of P68	Moderate
P66d / P67 / P68 / P69 / P70 / P71	Village + land to west (either side of the Great North Road), or field to the east of P70, or land at Home Farm to the south of the village	Moderate – High

Water End	**Retain as washed over settlement** as the open character of the settlement contributes to the openness of the Green Belt.

Washed Over Settlement	Analysis Results
Swanley Bar	The initial analysis of openness (**Appendix 5.1**) identified this settlement as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with release. Parcel 79 was defined to assess the contribution of the settlement, and harm from release (**Appendix 6.1)**. Adjacent land to the south and east was assessed as Parcel 80. The following development scenarios were assessed (inset Green Belt boundaries for which are shown in **Appendix 5.2**):

Scenario Code	Release Scenario	Harm
P79	Developed settlement area	Low
P79 / P80a	Settlement + land between Swanley Bar and Little Heath	Moderate
P79 / P80	Settlement + land between Swanley Bar and Little Heath and land to east	High

5.9 In summary, the initial analysis of openness (**Appendix 5.1**) identified seven out of the 16 washed over settlements as requiring further assessment in relation to the contribution the settlement makes to the Green Belt purposes and the potential harm that may be associated with their release. These were Lemsford, Newgate Street, Stanborough, Essendon, Northaw, Bell Bar and Swanley Bar. These seven settlements have potential to be inset into the Green Belt as they do not have an open character and do not make a significant contribution to the openness of the Green Belt. The above table provides a summary of the findings of the assessments of harm for the various development scenarios considered for these settlements (See **Appendix 5.2**). It is for the Council to consider, alongside other considerations, whether any of these settlements could be inset (i.e. removed from the Green Belt) as part of the review of the Local Plan.

6 Contribution Assessment Findings

Introduction

6.1 This chapter sets out the findings of the assessment of Green Belt contribution (as outlined in **Task 4** in **Chapter 3**).

6.2 The findings for the assessment of contribution to Green Belt purposes are, together with the assessment of harm that would result from release of Green Belt land, presented in **Appendix 6.1** on a parcel by parcel basis. For each parcel the following information is provided:

1) **The site reference number and size**.
2) **An OS map** of the site which includes the parcel boundary and absolute and non-absolute constraints.
3) **An aerial photograph** of the site, to illustrate the nature of land cover.
4) **A representative photograph** of the site.
5) **A description of the site** in terms of its land use and relationship with defined urban areas (i.e. settlements outside of Green Belt, or inset within but excluded from it).
6) **Findings of the assessment of contribution** for each of the Green Belt purposes and the local Green Belt purpose.
7) **Findings of the assessment of the harm** that would result from the release of the parcel, Stage 2 site (if one falls within the parcel) or any subdivision of it, from the Green Belt, taking into consideration the contribution to the Green Belt purposes, the impact on the integrity of the adjacent Green Belt and the continuity/ strength of potential revised Green Belt boundaries. Ratings are provided for each development scenario considered.

Summary of Findings

6.3 A total of 96 parcels of Green Belt land were defined in the Study area. **Table 6.1** and **Figures 6.1-6.5** present the results of the assessment of the assessment of contribution for each parcel and for each of the assessed Green Belt purposes (i.e. Purposes 1, 2, 3, 4 and the local purpose). A figure has not been included for Purpose 5 as this has not been assessed on a parcel by parcel basis.

6.4 **Appendix 6.1** contains all the assessment sheets for the parcels with the detailed judgements behind the ratings against each Green Belt purpose, as described above. **It is essential that the detailed commentaries on the parcels (as set out in Appendix 6.1) are read alongside the summary table (Tables 6.1) and the figures (Figures 6.1-6.5) in this chapter.**

6.5 The tables and figures do not present an aggregation of the parcels ratings against all the NPPF purposes. The NPPF does not require all the purposes of Green Belt to be met simultaneously and a significant or partial rating against any Green Belt purpose could be sufficient, on its own, to indicate an important contribution.

Table 6.1: Summary table of Contribution to Green Belt Purposes

Parcel No	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Local Purpose Rating
P1	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P2	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Significant contribution
P3	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Significant contribution
P4	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P5	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P6	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P7	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P8	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P9	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P10	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P11	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Significant contribution	Partial contribution
P12	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Significant contribution	Partial contribution
P13	Limited or no contribution	Significant contribution	Significant contribution	Partial contribution	Significant contribution	Significant contribution
P14	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Partial contribution
P15	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Partial contribution
P16	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P17	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P18	Limited or no contribution	Limited or no contribution	Significant contribution	Partial contribution	Significant contribution	Partial contribution
P19	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P20	Limited or no contribution	Limited or no contribution	Significant contribution	Partial contribution	Significant contribution	Limited or no contribution
P21	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Significant contribution	Partial contribution
P22	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Significant contribution	Limited or no contribution
P23	Limited or no contribution	Limited or no contribution	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P24	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Significant contribution	Limited or no contribution
P25	Limited or no contribution	Partial contribution	Significant contribution	Partial contribution	Significant contribution	Limited or no contribution
P26	Limited or no contribution	Partial contribution	Partial contribution	Partial contribution	Significant contribution	Limited or no contribution
P27	Limited or no contribution	Significant contribution	Significant contribution	Significant contribution	Significant contribution	Limited or no contribution
P28	Limited or no contribution	Significant contribution	Significant contribution	Significant contribution	Significant contribution	Limited or no contribution
P29	Limited or no contribution	Significant contribution	Partial contribution	Significant contribution	Significant contribution	Limited or no contribution
P30	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P31	Limited or no contribution	Partial contribution	Significant contribution	Significant contribution	Significant contribution	Limited or no contribution
P32	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P33	Limited or no contribution	Limited or no contribution	Partial contribution	Partial contribution	Significant contribution	Limited or no contribution

Parcel No	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Local Purpose Rating
P34	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P35	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P36	Limited or no contribution	Limited or no contribution	Significant contribution	Partial contribution	Significant contribution	Limited or no contribution
P37	Limited or no contribution	Limited or no contribution	Significant contribution	Partial contribution	Significant contribution	Limited or no contribution
P38	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P39	Limited or no contribution	Limited or no contribution	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P40	Limited or no contribution	Significant contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P41	Limited or no contribution	Significant contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P42	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P43	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P44	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P45	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P46	Limited or no contribution	Significant contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P47	Limited or no contribution	Partial contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P48	Limited or no contribution	Significant contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P49	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P50	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P51	Limited or no contribution	Limited or no contribution	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P52	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P53	Limited or no contribution	Limited or no contribution	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P54	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P55	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P56	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P57	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P58	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P59	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P60	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P61	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P62	Limited or no contribution	Partial contribution	Partial contribution	Limited or no contribution	Significant contribution	Partial contribution
P63	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P64	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P65	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Significant contribution
P66	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P67	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution

Parcel No	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Purpose 5 Rating	Local Purpose Rating
P68	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P69	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P70	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P71	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P72	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P73	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P74	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P75	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P76	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P77	Limited or no contribution	Limited or no contribution	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P78	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Significant contribution
P79	Limited or no contribution	Limited or no contribution	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P80	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P81	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P82	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P83	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P84	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Significant contribution
P85	Limited or no contribution	Limited or no contribution	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P86	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P87	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P88	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Partial contribution
P89	Limited or no contribution	Partial contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P90	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P91	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P92	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P93	Limited or no contribution	Limited or no contribution	Partial contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P94	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution
P95	Limited or no contribution	Limited or no contribution	Significant contribution	Limited or no contribution	Significant contribution	Limited or no contribution

7 Harm Assessment Findings

Introduction

7.1 This chapter sets out the findings of the assessment of Green Belt harm (as outlined in **Task 5** in **Chapter 3**).

7.2 As outlined in **Chapter 3,** the assessment of harm considered three key factors:

- The contribution across the area of potential release/development to the NPPF Green Belt Purposes.
- The potential implications of the loss of openness within the area of potential release/development on the integrity of the wider Green Belt.
- Consistency and strength of the Green Belt boundary/urban edge in relation to the potential area of Green Belt release/development.

7.3 Where there were variations in the three factors influencing Green Belt harm across an area / site, different development scenarios were identified to reflect any variations in harm. This took into account the fact that harm may vary if development is constrained to a smaller area than the parcel as a whole or, reflecting the need to consider cumulative impact, harm may differ if development is expanded to adjacent areas/parcels. Where necessary, parcels were sub-divided or merged as part of the assessment of harm.

7.4 As summarised in **Chapter 3**, the development scenarios considered in the assessment included:

- Assessment of harm of the release of the whole parcel.
- Assessment of harm of the release of any sites assessed in the Stage 2 Green Belt Study.
- Assessment of harm of the proposed Local Plan proposed housing allocations (where these vary from the Stage 2 Green Belt sites).
- Assessment of harm for smaller parts of Stage 2 sites or where there is the potential for reduced harm.
- Assessment of cumulative scenarios – e.g. release of adjacent sites or parcels, but only where harm would be different to either of the constituent sites/parcels.

7.5 The findings for the assessment of harm are, together with contribution to Green Belt purposes, presented in **Appendix 6.1** on a parcel by parcel basis. Ratings are provided for each development scenario considered.

Summary of Findings

7.6 The detailed findings of the assessment of harm are included in **Appendix 6.1** and are summarised in **Table 7.1** below and on **Figure 7.1. Figure 7.1** shows the potential degree of harm that would result if the parcels or sub-parcels were released – i.e. taking account of the lowest level of harm for the development scenarios considered within the parcel. Further maps are included in **Appendix 6.1** for each parcel showing the level of harm for all scenarios that were considered for each parcel.

7.7 Where development scenarios have been assessed as having lower harm on the Green Belt if they were to be removed from the Green Belt, this does not necessarily mean that those areas should be released. Any release of Green Belt land requires consideration of the 'exceptional circumstances' justifying its release. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that can justify release of the land from the Green Belt. Other factors, such as the sustainability and the ability to meet development needs outside of the Green Belt need to be taken into consideration. This is explained further below.

Table 7.1: Green Belt Assessment of Harm Ratings

Parcel No	Scenario Code	Release Scenario	Harm Rating
P1	P1	Release of all, or part of parcel	High
P2	P2	Release of all, or part of parcel	Very High
P3	P3	Release of the parcel as a whole	Very High
	P3a	Release of Stage 2 site WGr2 and/or WGr3	High
	P3b	Release of the northern half of Stage 2 site WGr3 (retaining woodland to the south)	Moderate
	P3c	Release of Stage 2 site WGr1 and/or Local Plan allocations HS15	Moderate - High
	P3d	Release of Stage 2 site EA10	Moderate
P4	P4	Release of all, or part of parcel	High
P5	P5	Release of the parcel as a whole	High
	P5a	Release of Stage 2 sites WGr4/WGr5	Low
P6	P6	Release of all, or part of parcel	High
P7	P7	Release of the parcel as a whole	Moderate - High
	P7a	Release of all Stage 2 sites Wel1/Wel2/Wel6/Wel15 in isolation or in combination	Moderate - High
P8	P8	Release of the parcel as a whole	High
	P8a	Release of Stage 2 site Wel3 (or Local Plan allocation HS20)	Moderate - High
	P8b	Release of Stage 2 site Wel5	Moderate
	P8c	Release of Stage 2 sites Wel14 or Wel16	High
P9	P9	Release of the parcel as a whole	Low
	P9a	Release of P9 and Stage 2 site Wel5 – Moderate High	Moderate - High
P10	P10	Release of the parcel as a whole	Moderate - High
	P10a	Release of the Stage 2 site WEL4 or Local Plan allocation HS19	Moderate - Low
P11	P11	Release of all or part of the parcel (including the southern part of site WGC6)	Moderate - High
	P11a	Release of site WGC6 as a whole	Moderate - High
P12	P12	Release of the whole parcel	Very High
	P12a	Release of the southern half of the parcel	Moderate
	P12b	Release of that part of site WGC6 that falls within the parcel	Moderate - High
	P12c	Release of site WGC2	Moderate
	P12d	Release of site WGC6 as a whole	Moderate - High
P13	P13	Release of the parcel as a whole or in part	Very High
P14	P14	Release of parcel as a whole or in part, including Stage 2 sites OMH4, OMH5 and GTLAA04, and Local Plan allocations HS16, HS17 and HS32 - assuming retention of screening tree cover along the A1(M) embankment	Moderate - Low
P15	P15	Release of the parcel as a whole or in part, including Stage 2 sites OMH3, OMH6 North (part) and OMH7	Moderate - High
P16	P16	Release of the parcel as a whole	High
P17	P17	Release of the parcel as a whole	High
	P17a	Release of site Dig1	Moderate - High
P18	P18	Release of all or part of the parcel	Moderate - High

Parcel No	Scenario Code	Release Scenario	Harm Rating
P19	P19	Release of the parcel as a whole or in part, including Stage 2 parcel Dig4	Very High
	P19a	Release of the site to the north/west of the riverside area	High
P20	P20	Release of the parcel as a whole	Moderate - High
	P20a	Release of developed land at the western end of the parcel	Moderate - Low
	P20b	Release of WGC8	Moderate
P21	P21	Release of the parcel as a whole	Very High
	P21a	Release of land on the plateau	Moderate
	P21b	Release of Stage 2 site WGC7 / most of site GTLAA06	Very High
P22	P22	Release of all or part of the parcel, including Stage 2 site WGC4(GB)	Moderate - High
P23	P23	Release of all or part of the parcel	Low
P24	P24	Release of whole parcel, or land within it forming part of site WGC5 / allocations SDS2 and EA11	Moderate - High
	P24a	Release of area to east of Holwell Hyde Lane, and allocation EA11	Moderate
	P24b	Release of site allocation EA11 (part of which is in P24)	Moderate - Low
	P24c	Site WGC5 / allocations SDS2 and EA11	Moderate - High
P25	P25	Release of whole parcel or Stage 2 site WGC5 as a whole or Local Plan allocation SDS2	Moderate - High
	P25a	Release of allocation EA11, including land within P24	Moderate - Low
P26	P26	Release of the parcel as a whole	Moderate
P27	P27	Release of the parcel as a whole, including Local Plan allocation HS33	Very High
	P27a	Release of the western part of site WGC1	Moderate
	P27b	Release of Stage 2 site and Local Plan allocation WGC1	Moderate - High
P28	P28	Release of any part of the parcel	Very High
P29	P29	Release of any part of the parcel	Very High
P30	P30	Release of the whole parcel either in isolation or in association with the insetting of Stanborough (P39)	Moderate – High
	P30a	Release of the developed roadside edge of the parcel, either in isolation or in association with the insetting of Stanborough (P39)	Moderate
P31	P31	Release of all or part of the parcel	Moderate – High
P32	P32	Release of all or part of the parcel	Very High
P33	P33	Release of the parcel alongside release of P34, the more developed part of Lemsford to the south of the main village road.	Moderate
P34	P34	Inset existing settlement	Moderate – Low
	P34a	Release of the parcel alongside release of P33, the less developed part of Lemsford to the north of the main village road	Moderate
P35	P35	Release of whole parcel alongside release of existing washed-over village of Lemsford (P33 and P34)	High
	P35a	Release of field on western side of parcel, alongside release of existing washed-over village of Lemsford (P33 and P34)	Moderate
P36	P36	Release of all or part of parcel	High
P37	P37	Release of all or part of the parcel, in combination with release of P39 (Stanborough)	High
P38	P38	Release of all or part of the parcel, in combination with release of P39 (Stanborough)	Moderate
P39	P39	Release of all, or part of parcel	Low
P40	P40	Release of all or part of the parcel, including part of Stage 2 site Hat1 and Local Plan allocation SDS5, and in combination with release of P39 (Stanborough)	Very High
P41	P41	Release of whole parcel (part of Stage 2 site Hat1/ Local Plan allocation SDS5)	Very High
	P41a	Release of the central part of the parcel	High
	P41b	Release of the southern and western parts of the parcel	Moderate – High

Parcel No	Scenario Code	Release Scenario	Harm Rating
	P41c	Release of P41 alongside the rest of Stage 2 site Hat1	Very High
	P41d	Release of the southern and western parts of the parcel in conjunction with the release of P43 and/or P45 (the Symondshyde Farm site allocation)	Moderate – High
	P41e	Release of Local Plan allocation SDS5, constituting the central part of the parcel along with most of P42 and P43	High
P42	P42	Release of whole parcel (most of which is part of Stage 2 site Hat1 / Local Plan allocation SDS5)	Moderate
	P42a	Release alongside the rest of Stage 2 site Hat1 / Local Plan allocation SDS5	Very High
P43	P43	Release of parcel as a whole (most of which forms part of Stage 2 site Hat1 / Local Plan allocation SDS5)	Moderate
	P43a	Release in conjunction with release of Stage 2 site Hat15 (Symondshyde) and Local Plan allocation SDS6	Moderate - High
	P43b	Release alongside the rest of Stage 2 site Hat1 / Local Plan allocation SDS5	Very High
P44	P44	Release of the whole parcel	High
	P44a	Release of the southern/western half of the parcel (including Stage 2 site GTLAA09 and Local Plan allocation HS34)	Moderate - High
	P44b	Release of site GTLAA09, including Local Plan allocation HS34, in isolation or in combination with P43	Moderate - High
	P44c	Release of southern half of parcel in combination with release of P43	Moderate - High
	P44d	Release of southern half of parcel in combination with release of Symondshyde (Hat15)	High
P45	P45	Release of all or part of the site / Stage 2 parcel Hat15 / Symondshyde Farm Site Allocation	Moderate - High
	P45a	Release of all or part of the site / Stage 2 parcel Hat15 / Symondshyde Farm Site Allocation in combination with release of P43 and/or scenario P41b	Moderate - High
P46	P46	Release of the parcel as a whole and P47	Very High
	P46a	Release of land to the east of the existing settlement edge along Hatfield Road	High
	P46b	Release of Stage 2 site Hat2	Moderate - High
P47	P47	Release of the parcel as a whole	Moderate
P48	P48	Release of P75 including Hat 3, Hat 4 and Hat5 together or in part	Very High
	P48a	Release Stage 2 site Hat19	Moderate
P49	P49	Release of parcel as a whole or in part, in association with insetting of Essendon (P51)	High
P50	P50	Release of parcel as a whole, in association with insetting of Essendon (P51)	High
	P50a	Release of the southern field, in association with the insetting of Essendon (P51)	Moderate - High
P51	P51	Inset existing settlement	Moderate - Low
P52	P52	Release of parcel as a whole or in part, in association with insetting of Essendon (P51)	Moderate - High
P53	P53	Release of all, or part of parcel	Low
P54	P54	Release of the parcel as a whole, in association with the insetting of Bullens Green (P53)	Moderate - High
	P54a	Release of the northeast of the parcel , in association with the insetting of Bullens Green (P53)	Moderate - Low
P55	P55	Release of all, or part of parcel	High
	P55a	Release of the park and ride area in isolation, or in combination with the cemetery and the P56a area to the east.	Moderate - High
P56	P56	Release of the parcel as a whole, or Stage 2 site Hat11	High
	P56a	Release of Local Plan allocation HS11, in isolation or in combination with the cemetery and the park and ride area to the west.	Moderate - High
	P56b	Release of the developed eastern section of the parcel	Moderate

Parcel No	Scenario Code	Release Scenario	Harm Rating
P57	P57	Release of all, or part of parcel (including Stage 2 sites GTLAA01, GTLAA02, GTLAA03, WeG4a and WeG4b, and Local Plan allocations SDS7 and HS35)	Moderate - Low
	P57a	Release of P57 in association with P58 (including Stage 2 sites GTLAA01, GTLAA02, GTLAA03, WeG4a and WeG4b, and Local Plan allocations SDS7 and HS35)	Moderate - High
P58	P58	Release of all, or part of parcel	Moderate - High
	P58a	Release of P57 in association with P58 (including Stage 2 sites GTLAA01, GTLAA02, GTLAA03, WeG4a and WeG4b, and Local Plan allocations SDS7 and HS35)	Moderate - High
P59	P59	Release of the parcel as a whole	Moderate
	P59a	Release of Stage 2 site WeG6	Moderate
P60	P60	Release of the parcel as a whole (WeG12)	Moderate
P61	P61	Release of the parcel as a whole	Moderate - High
	P61a	Release of the school site and pitches	Moderate - Low
	P61b	Release of Stage 2 site WeG10	Moderate
	P61c	Release of the parcel as a whole, in combination with P62	High
P62	P62	Release of the parcel as a whole	High
	P62a	Release of the parcel as a whole, in combination with P61	High
P63	P63	Release of all, or part of parcel	High
	P63a	Release of the parcel in combination with the release of P64	High
P64	P64	Release of the parcel as a whole	Moderate - High
	P64a	Release of Stage 2 sites WeG1, WeG2	Low
	P64b	Release of Stage 2 site WeG1, Stage 2 site WeG2 and the allotments site	Moderate
	P64c	Release of Stage 2 sites WeG1, WeG2, WeG3 and allotment area	Moderate
	P64d	Release of the parcel as a whole in combination with P63	High
	P64e	Release of Stage 2 sites WeG1, WeG2, WeG3, WeG15 and the allotment area	Moderate - High
P65	P65	Release of the parcel as a whole, or the area to the north of Bradmore Lane (including Stage 2 site BrP5)	Very High
	P65a	Release of Stage 2 site BrP4 or Local Plan allocation HS22	High
P66	P66	Release of all of the parcel	Moderate - High
	P66a	Release of Stage 2 site BrP12	Moderate - High
	P66b	Release of Stage 2 site BrP13, including Local Plan allocation HS21	Moderate - High
	P66c	Release of Stage 2 site BrP14, including Local Plan allocation HS23	Moderate - Low
	P66d	Release of Stage 2 site Land at Bell Bar, in association with insetting of Bell Bar	Moderate - High
P67	P67	Release of all, or part of parcel , in association with the insetting of Bell Bar (P68)	Moderate - High
P68	P68	Inset the existing settlement	Moderate - Low
P69	P69	Release of parcel as a whole or in part in association with P70	Moderate - High
P70	P70	Release of the parcel as a whole	Moderate
	P70a	Release of all or part of parcel P71, in combination with release of P70 (northern part of Bell Bar) and P68	Moderate - High
	P70b	Release of all or part of parcel P69, in combination with release of P70 (northern part of Bell Bar)	Moderate - High
P71	P71	Release of parcel as a whole or in part	Moderate - High
	P71a	Release of parcel as a whole or in part, in association with insetting of P68 and P70	Moderate - High
P72	P72	Release of the parcel as a whole, in association with the insetting of P68	Moderate
	P72a	Release of Stage 2 site Land at Bell Bar (including Stage 2 site BrP1) in association with the insetting of Bell Bar (P68)	Moderate - High

Parcel No	Scenario Code	Release Scenario	Harm Rating
P73	P73	Release of the parcel as a whole, or any part of the site (Transmitting Station or Stage 2 site BrP2)	Moderate - High
P74	P74	Release of all, or part of parcel	Moderate
P75	P75	Release of all, or part of parcel	High
P76	P76	Release of all, or part of parcel	High
P77	P77	Release of the parcel as a whole	Low
P78	P78	Release of all parcel	Very High
	P78a	Release of Stage 2 sites BrP6, BrP9 and BrP10, in whole or part	High
	P78b	Release of the eastern end of the parcel, including Stage 2 sites BrP7 and BrP7 Extension (Local Plan allocation HS24)	High
P79	P79	Inset the existing settlement	Low
P80	P80	Release of the parcel as a whole, in association with the insetting of Swanley Bar (P79)	High
	P80a	Release of land between Little Heath and Swanley Bar (P79), in association with insetting of the latter	Moderate
	P80b	Release of Stage 2 site Lhe1, including Local Plan allocation HS25	Moderate - Low
P81	P81	Release of the parcel as a whole	High
	P81a	Release of the southwest of the parcel	Moderate - Low
P82	P82	Release of the parcel as a whole	Moderate - High
P83	P83	Release of all, or part of parcel	Moderate - High
P84	P84	Release of the parcel as a whole or in part, in association with the insetting of Northaw (P85)	High
P85	P85	Inset existing settlement	Moderate - Low
P86	P86	Release of the parcel as a whole	High
	P86a	Release of area of existing residential development along The Ridgeway and Carbone Hill, including Stage 2 site Cuf2	Moderate - High
P87	P87	Release of the parcel as a whole, or in part (including Stage 2 parcels Cuf4, Cuf5, Cuf7, Cuf10 and Cuf12, and Local Plan allocations HS29 and HS30)	High
P88	P88	Release of the parcel as a whole	Moderate - High
	P88a	Release of the area at Cuffley School	Low
	P88b	Release of Stage 2 site Cuf3	Moderate
	P88c	Release of Stage 2 site Cuf6, including Local Plan allocation HS28	Moderate
	P88d	Release of the area at Cuffley School, Stage 2 site Cuf3, Stage 2 site Cuf6 and Local Plan allocation HS28	Moderate
	P88e	Land to west of railway line	Moderate - High
P89	P89	Release of the parcel as a whole, including Stage 2 site Cuf1	Moderate - High
	P89a	Release of Local Plan allocation HS27	Moderate
P90	P90	Release of the parcel as a whole	Moderate
P91	P91	Release of the parcel as a whole, in association with the insetting of Newgate Street (P93)	High
P92	P92	Release of the parcel as a whole, in association with the insetting of Newgate Street (P93)	High
	P92a	Release of western section of P92, in association with the insetting of Newgate Street (P93)	Moderate - High
P93	P93	Inset existing settlement	Moderate
P94	P94	Release of the parcel as a whole, in association with the insetting of Newgate Street (P93)	High
	P94a	Release of the northwest of the parcel, in association with the insetting of Newgate Street (P93)	Moderate
P95	P95	Release of the parcel as a whole, in association with the insetting of Newgate Street (P93)	High
P96	P96	Release of the parcel as a whole or in part, including Stage 2 parcel Wel11 and Local Plan allocation HS18	Moderate

Role of Green Belt Harm Assessment

7.8 Consideration of the harm to Green Belt purposes that could result from the release of land for housing development is an essential aspect of the decision-making process; however it is important to recognise that consideration of Green Belt harm sits alongside environmental and sustainability considerations as one of three key elements of that decision-making process. Whilst the ideal would be to minimise harm to the Green Belt, it may in practice be that locations which will result in the least *overall* harm, will in fact be ones which do significantly harm the Green Belt. Planning judgement in the Local Plan process will be needed to weigh up the relative importance of each key element in any given location, and to determine whether the benefit of accommodating Welwyn Hatfield's housing need outweighs the overall harm caused in achieving it.

7.9 It is also important to recognise the strategic nature of Green Belt. The extents of the Welwyn Hatfield Green Belt do not reflect any detailed analysis of environment or sustainability of growth but rather a more generalised desire to constrain urbanisation of the landscape. Decisions that informed the delineation of the Green Belt around Welwyn Hatfield were made in light of local development pressures identified at that time.

7.10 The strategic nature of Green Belt, and recognition of local/regional variations in the extent of development and nature of open land in between settlements, is reflected in the absence from national planning policy of any definitions to accompany its defined purposes. Thus, with reference to the purposes stated in paragraph 134 of the NPPF, there is no definition of what constitutes a 'large built up area', a 'town', a 'historic town' or 'countryside', and variations in local planning authorities' interpretations of these are evident in Local Plans and/or in reviews of Green Belt that have been carried out.

7.11 In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate housing development, but instead identifies the variations in harm that would be caused to the Green Belt purposes.

7.12 It is also important to note that the loss of Green Belt within Welwyn Hatfield would not just have impacts on the Borough. It could potentially have impacts on the strategic function of Metropolitan Green Belt as a whole, particularly if you consider the potential cumulative release from all authorities revising their Green Belt boundaries.

8 New Settlement Release

Introduction

8.1 This chapter sets out the findings of the assessment of harm associated with release of potential new settlement land (as outlined in **Task 6** in **Chapter 3**).

8.2 As outlined in **Chapter 3**, the Inspector requested that if the quantum of development required (to deliver the Council's housing targets) can't be met adjacent to urban areas, the Council should assess other locations that are large enough to accommodate a new settlement.

8.3 The assessments of contribution and harm in **Chapters 6** and **7** summarise the potential effects of developing land within the Green Belt adjacent to the existing built up areas, and adjacent to settlements which are currently washed-over, but which have the potential to be inset. Whilst new development within these areas may not constitute a standalone new settlement, some of these locations could be considered for their potential as a large urban extension, or a new growth point around an existing washed over settlement (which could be inset). In order to assess the Green Belt issues associated with a new standalone settlement, an assessment of the contribution to the Green Belt purposes was undertaken for all remaining Green Belt land within the Borough.

Summary of Findings

8.4 This section present the findings of the assessment of contribution for the remaining areas of Green Belt within the Borough – (i.e. not adjacent to the built up areas, or adjacent to settlements which are currently washed-over, but which have the potential to be inset (as set out in **Chapters 6 and 7**)).

Purpose 1: Check the unrestricted sprawl of large built-up areas

8.5 As outlined in **Chapter 4**, there are no areas within the Borough that make a significant contribution to Purpose 1 as Welwyn Hatfield does not contain any settlements defined as large built up areas, or any land that directly contributes to preventing the sprawl of neighbouring large built up areas including London, Stevenage, Cheshunt (which is contiguous with Enfield). The Green Belt within Welwyn Hatfield does, however, play a strategic role in preventing sprawl from London, as was first conceptualised in the designation of the Metropolitan Green Belt in response to pressures from London. Indeed, all of the stated Green Belt purposes contribute to the fundamental aim of preventing urban sprawl. As outlined in **Chapter 4,** no localised variations in performance of this purpose can however be identified for this purpose within the Borough. Purpose 1 is therefore not considered further in this assessment.

Purpose 2: Prevent neighbouring towns from merging

8.6 **Figure 8.1** shows the findings of the assessment of contribution to Purpose 2 for all areas within the Borough, including the wider Green Belt. This shows that within the wider Green Belt there are three key areas that make a 'significant' contribution to Purpose 2. This includes land between Welwyn Garden City and St Albans and Hatfield and St Albans. As discussed in **Chapter 4,** these gaps are particularly fragile. Areas making a partial contribution to Purpose 2 include land between: Welwyn Garden City and Stevenage; Welwyn Garden City and Harpenden; Potters Bar and Cheshunt, and Hatfield and Potters Bar (namely the land including the Royal Veterinary College). The remaining land areas make limited or no contribution to Purpose 2.

Purpose 3: Assist in safeguarding the countryside from encroachment

8.7 **Figure 8.2** shows the findings of the assessment of contribution to Purpose 3 for all areas within the Borough, including the wider Green Belt. This shows that virtually all the wider Green Belt makes a strong contribution to Purpose 3 with the exception of the area around the Royal Veterinary College and Danesbury (the area between Codicote and Welwyn). These areas do not perform so highly against Purpose 3 due to the greater degree of existing development that has taken place.

Purpose 4: Preserve the setting and special character of historic towns

8.8 None of the land within the wider Green Belt makes a contribution to Purpose 4. As outlined in **Chapter 4** there is no intervisibility between the historic core of Welwyn Garden City and the surrounding countryside, but some value can be attached to the presence of land that constitutes an open, undeveloped setting. It is not possible, however, to identify specific areas of open land within the wider Green Belt that are key particular characteristics of the planned town of Welwyn Garden City.

Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land

8.9 As outlined in **Chapter 3,** it is not possible to assess the contribution of Green Belt land to purpose 5 on a parcel by parcel basis. For the reasons outlined in **Chapter 3**, all land within Welwyn Hatfield is considered to make a significant contribution to his purpose.

Local Purpose: Maintain Local Settlement Separation

8.10 An assessment has not been undertaken of the variations in the wider Green Belt in relation to the Local Purpose as in line with the Inspector's comments, it is the National NPPF purposes which hold greater weight and the establishment of a new settlement may require an acceptance of some change to the local settlement pattern.

Conclusions

8.11 As outlined above, within Welwyn Hatfield there are no variations in the performance of the Green Belt to purposes 1, 4 and 5 within the wider Green Belt. There are, however, variations in the performance of Purpose 2 and 3 and therefore these assessments can be used to identify which areas in the wider Green Belt make a stronger or weaker overall contribution to the Green Belt purposes. As almost all areas within the wider Green Belt make a significant contribution to Purpose 3 (with the exception of the areas around the Royal Veterinary College and Danesbury), it is Purpose 2 that provides a useful indicator of where new settlement locations could potentially result in less harm to the Green Belt.

8.12 In summary, the areas which make limited or no contribution to Purpose 2, and the two areas which only make a partial contribution to Purpose 2 and 3 (the Royal Veterinary College and Danesbury), are the weaker performing areas of the wider Green Belt that could be considered for potential new settlement locations.

8.13 Identifying new settlement locations however requires consideration of a wide range of factors beyond Green Belt matters. Paragraph 138 of the NPPF states that *'When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.'* This study does not therefore draw conclusions on which are the most suitable locations for a new settlement as that requires an assessment of issues (sustainability, deliverability etc.) beyond the scope of this Green Belt study. Indeed it is very unlikely that Danesbury and the Royal Veterinary College will come forward for proposal as new settlements, not least because development within either parcel could have a significant impact on local settlement gaps which has not been considered in this strategic analysis.

9 Identification of 'Most Essential' Green Belt

Introduction

9.1 This chapter identifies those areas considered to represent the 'most essential' Green Belt in the Borough. Judgements are informed by the strategic-scale analysis of Green Belt in **Chapter 4** and the assessments of: washed over settlements; parcels around inset settlement edges; and the wider Green Belt (in the context of potential new settlement locations) in **Chapters 5-8**.

9.2 Ultimately it is difficult to state in absolute terms that any Green Belt is critical enough to deem it essential without setting its functional value alongside the demand/need case and sustainability/environmental considerations. However, relative judgements can be made as to what land is 'most essential'. The loss of openness of any areas deemed 'most essential' would clearly constitute a failure of the Green Belt to achieve its stated functions.

9.3 As outlined in **Chapter 3**, for land to be categorised as 'most essential,' the level of harm associated with its release must have been assessed as 'very high', reflecting:

- a particularly significant contribution to a single Green Belt purpose; or
- a significant contribution to more than one Green Belt purpose (other than the 5th purpose relating to the recycling of urban land); or
- a particularly strong impact on the defined Green Belt boundary, or on the integrity of the wider Green Belt.

Summary of Findings

9.4 Conclusions are set out in **Table 9.1** below, and the 'most essential' areas of Green Belt are illustrated on **Figure 9.1**.

Table 9.1: Most Essential Green Belt

Green Belt Area	Justification	Comments
The gap between Knebworth and Woolmer Green (P2 and P3).	Partial contribution to Purpose 2 and significant contribution to the local purpose and Purpose 3.	There is only 400m separation between Knebworth and Woolmer Green, across undeveloped, visually open farmland. Gaps between settlements in the north-south chain between Stevenage and Potters Bar are narrow, so land which preserves local settlement identity by forming an undeveloped countryside gap is considered very important in Green Belt terms.
The hill centred on Lockley Farm (P13)	Significant contribution to Purpose 2, Purpose 3 and the local purpose.	This parcel lies at the centre of a ring of settlements: Welwyn Garden City, Welwyn, Oaklands and Mardley Heath, and Digswell. Although physical settlement gaps along the A1M and B197 are narrow, the elevated landform and associated tree cover form a visually prominent area that, by providing a rural setting to the adjacent settlements, plays a significant role in preserving distinctions between urban areas.

Green Belt Area	Justification	Comments
The valley of the River Mimram, passing through P13, P12, P19 and P21.	Strength of contribution to Purpose 3.	The river valley is a linear landscape element that creates a strong distinction between Welwyn Garden City and Digswell, despite their physical proximity, and which forms a distinct northern edge to Welwyn Garden City, continuing eastwards as an undeveloped corridor to Hertford. Any development downslope into the valley from the elevated suburbs of Digswell Park or Haldens would mark a clear step-change in urban form. Parts of P12, P19 and P21 away from the valley are not considered 'most essential'. P20 also forms part of the valley side, but only upper slopes which are well contained by tree cover from the lower valley sides (outside of the Borough) and are therefore less essential.
The valley of the River Lea, passing through P27, P28, P29 and P32.	Strength of contribution to Purpose 2 and/or significant contribution to Purposes 3 and/or 4.	There is only just over 1km separating the Borough's two towns, Welwyn Garden City and Hatfield, with the Lea Valley forming the majority of the gap. Retaining openness within the valley is very important in the prevention of perceived coalescence in parcels P27, P28 and P29. As a linear feature wrapping around the south-western part of Welwyn Garden City, the Lea Valley also forms a largely undeveloped area of countryside that historically defines the extent of the town.
The gap between Welwyn Garden City and Hatfield to the west of Stanborough (P40, part of P41 and land in between).	Significant contribution to Purpose 2 and Purpose 3.	The Lea Valley provides an immediate buffer to expansion of Welwyn Garden City, but development within the valley at Stanborough, and to a lesser extent in Lemsford, has blurred the transition from town to countryside. Open land to the south-west of Welwyn Garden City therefore plays an important role in preserving the separation provided by the Lea Valley, and in preventing any sense of Hatfield starting to 'contain' Welwyn Garden City.
The gap between Hatfield and St Albans in P46 (part) and most of P48, and to the south of Symondshyde Great Wood.	Significant contribution to Purpose 2 (which is particularly strong to the west of Ellenbrook) and to Purpose 3.	Only 1.5km separates the nearest inset edges of St Albans - which has an arm of expansion between the A1057 and the railway line - and Hatfield (at Ellenbrook), and the perceived gap is weakened by washed-over development at Smallford and Sleapshyde. This gap is therefore considered to be fragile.
The gaps between Welham Green, Brookmans Park and Potters Bar (most of P65 and part of P78)	Partial contribution to Purpose 2 and significant contribution to the local purpose and Purpose 3.	Much of the land between these settlements is open countryside that also plays a significant role in retaining narrow local settlement gaps, and in so doing preserving the wider separation between Hatfield and Potters Bar. There is less than 650m separating Welham Green and Brookmans Park and only 1km between the nearest edges of Brookmans Park and Potters Bar or Little Heath. The core areas between these settlements are considered to be the 'most essential'.

9.5 Preventing countryside encroachment and settlement coalescence – both between towns and between smaller inset settlements that affect the rural gaps between towns – are the key roles of Welwyn Hatfield's Green Belt. The location of the larger towns and conurbations – Stevenage, Cheshunt and the Greater London urban area – outside of the Borough means that Green Belt land outside of the Borough plays the principal role in preventing the sprawl of those larger settlements, but it is recognised that Welwyn Hatfield's Green Belt contributes towards preventing urban sprawl through its other purposes too. In terms of the special character and setting of historic towns, some land around Welwyn Garden City is considered to contribute to this purpose but in the main there is either insufficient 'special character' in the Borough's towns, or insufficient dependence on landscape setting for that character, for this Green Belt purpose to be relevant.

9.6 The distribution of 'most essential' Green Belt reflects principally the fragility of gaps between towns and intervening inset settlements located along the main north-south transport links through the Borough, and also east-west between Hatfield and St Albans. Natural landforms – river valleys and hills – make a particular contribution to this separation, with the former providing consistent and readily distinguishable edges that mark urban boundaries to the north and south of Welwyn Garden City. Land further from inset towns and villages, notably in the south-eastern quadrant of the Borough and towards the north-western fringes, has a stronger rural character which would be added into the planning balance in terms of landscape quality and sensitivity; however considered purely in terms of Green Belt's spatial purposes, these areas play a weaker role in settlement separation and so are not considered 'most essential'.

10 Summary and Conclusions

Introduction

10.1 This chapter sets out the conclusions from the assessments in **Chapters 4-9**. It then identifies considerations relating to the release of Green Belt land, and potential measures to mitigate harm, or to enhance the beneficial use of remaining Green Belt.

Summary of Assessment Findings

Strategic Role of the Green Belt

10.2 The Green Belt within Welwyn Hatfield forms part of the Metropolitan Green Belt. Approximately 79% of the Borough lies within the Green Belt which is drawn tightly around the larger settlements including Welwyn Garden City, Hatfield, Welwyn, Welham Green, Brookmans Park and Cuffley as well as the smaller settlements of Woolmer Green, Oaklands and Mardley Heath, Digswell and Little Heath. There is a strong north-south orientation to urban development within the Borough, reflecting the pattern of transport routes to/from London.

10.3 The underlying purpose of the Metropolitan Green Belt is to prevent the spread of London, so at a fundamental strategic level most Green Belt within the Borough can be considered to contribute to this purpose. However, the subdivision of Green Belt purpose into five purposes allows for a more refined analysis in which different parts of the Green Belt can be found to contribute to differing extents to each of these component purposes.

Purpose 1: Check the unrestricted sprawl of large built-up areas

10.4 Welwyn Hatfield contains no settlements defined as 'large, built-up areas' but land within the Borough has the potential to preventing the sprawl of nearby large, built-up areas, including London, Stevenage and Cheshunt. However, development within the Borough would have clear separation from these large built-up areas and would relate more strongly to smaller settlements within the Borough. The assessment findings do not therefore identify areas which make a strong contribution locally to preventing sprawl from the large built up areas.

Purpose 2: Prevent neighbouring towns from merging

10.5 To understand the strategic contribution of land to this purpose it is necessary to consider the extent of separation between towns (tier 1 settlements), taking into account the role of landscape elements, natural or manmade, including intervening smaller settlements, in increasing or decreasing the perceived separation. There are a number of key fragile gaps between towns within the Borough; notably between Welwyn Garden City and Hatfield, and Hatfield and St Albans. There are also a number of fragile gaps between smaller intervening settlements which collectively affect the perception of separation between the tier one settlements such as between Welwyn Garden City and Stevenage and Hatfield and Little Heath and Potters Bar.

Purpose 3: Assist in safeguarding the countryside from encroachment

10.6 For the most part land within the Borough outside of inset settlements is open and rural, and therefore contributes to this purpose. Exceptions to this where contribution is lower are fairly isolated but are mostly locations within or close to the main north-south development corridor, primarily near to the A1M or the Great North Road (A1000), where development within the Green Belt has an impact on countryside character, land has a stronger relationship with inset areas, and roads or rail may create separation from the wider countryside.

Purpose 4: Preserve the setting and special character of historic towns

10.7 Welwyn Garden City is the only identified historic town within the Borough. Its historic significance is as one of the earliest of Britain's planned 'garden cities', a product of the movement initiated in 1898 by Sir Ebenezer Howard. Undeveloped land close to the historic south-western core of Welwyn Garden City is considered to make the strongest contribution to preserving the town's historic setting.

Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land

10.8 It is considered that all areas of Green Belt within the Borough make an equal contribution to Purpose 5.

Local Purpose: To Maintain the Existing Settlement Pattern

10.9 As outlined above, there are narrow gaps between many of the Borough's smaller inset settlements, or between those smaller settlements and towns. This is particularly the case in the north-south corridor along which the A1M, the mainline railway and the A1000 pass. Where open land plays a stronger role in local settlement separation, the contribution to this local purpose is higher.

Washed Over Status of Settlements

10.10 Sixteen settlements within Welwyn Hatfield are currently washed over by Green Belt. An assessment was undertaken of whether there is the potential for any of these washed over settlements to be inset into the Green Belt. This included an assessment of the openness of the settlements and the potential harm to the Green Belt that may occur if they were to be released. Seven settlements were identified that have the potential to be inset into the Green Belt as they do not have an open character and do not make a significant contribution to the openness of the Green Belt (Essendon, Northaw, Swanley Bar, Lemsford, Stanborough, Bell Bar and Newgate Street). Of these, further assessments were undertaken to determine the potential harm to the Green Belt of different development scenarios within and surrounding these settlements.

Harm from Release of Inset-Edge Land

10.11 The assessment of harm considered in combination, the contribution of land to the NPPF Green Belt Purposes alongside an evaluation of the potential implications of the loss of openness on the integrity of the wider Green Belt and the strength of Green Belt boundaries.

10.12 96 land parcel and 184 development scenarios were considered in the assessment.

10.13 Out of the 96 parcels of Green Belt land considered in the assessment of harm and taking the lowest rated development scenario within each parcel (see **Figure 7.1**):

- 804.7ha (23.4%) rated as 'very high' in terms of harm to Green Belt resulting from release.
- 1217ha (35.3%) rated as 'high' in terms of harm to Green Belt resulting from release.
- 998.6ha (29%) rated as 'moderate-high' in terms of harm to Green Belt resulting from release.
- 269.8ha (7.8%) rated as 'moderate' in terms of harm to Green Belt resulting from release.
- 102.4ha (3%) rated as 'moderate-low' in terms of harm to Green Belt resulting from release.
- 52.5ha (1.5%) rated as 'low' in terms of harm to Green Belt resulting from release.

10.14 Where development scenarios have been assessed as having lower harm on the Green Belt if they were to be removed from the Green Belt, this does not necessarily mean that those areas should be released. Any release of Green Belt land requires consideration of the 'exceptional circumstances' justifying its release. The relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that can justify release of the land from the Green Belt. Other factors, such as sustainability need to be taken into consideration.

10.15 It is also important to note that the loss of Green Belt within Welwyn Hatfield would not just have impacts on the Borough. It could potentially have impacts on the strategic function of Metropolitan Green Belt as a whole, particularly if you consider the potential cumulative release from all authorities revising their Green Belt boundaries.

Harm from Release of Land for New Settlements

10.16 In order to assess the Green Belt issues associated with a new standalone settlement, an assessment of the contribution to the Green Belt purposes was undertaken for the wider Green Belt land within the Borough (i.e. those areas not covered in the assessment of parcels around insets settlements, or settlements which have the potential to be inset). No variations in the performance of the Green Belt to Purposes 1, 4 and 5 were identified within this wider area. There were, however, variations in the performance of Purpose 2 and 3 and these assessments were therefore used to identify which areas in the wider Green Belt make a stronger or weaker overall contribution to the Green Belt purposes. In summary, the areas which make limited or no contribution to Purpose 2, and two areas which only make a partial contribution to Purpose 2 and 3 (the Royal Veterinary College and Danesbury), were identified as the weaker performing areas within the wider Green Belt. This assessment does not however draw conclusions on which are the most suitable locations for a new settlement as that requires an assessment of issues beyond the scope of this study. It is noted that there no potential for development within the Royal Veterinary College and Danesbury areas.

Most Essential Green Belt

10.17 Following the Stage 2 Hearings, the Inspector asked the Council to submit evidence to the examination identifying which parts of the Borough's Green Belt are critical or essential to retain. As set out in **Chapter 6**, most land within Welwyn Hatfield makes a significant contribution to one or more of the Green Belt purposes (even discounting Purpose 5). It is difficult to state in absolute terms that any Green Belt is critical enough to deem it essential without setting its functional value alongside the demand/need case and sustainability/environmental considerations. However relative judgements can be made as to what land is 'most essential'. As outlined in **Chapter 3**, for land to be categorised as 'most essential' within this study, the level of harm associated with its release must have been assessed as 'very high'.

10.18 The assessment (as set out in **Chapter 9** and **Figure 9.1**) concludes that preventing countryside encroachment and settlement coalescence – both between towns and between smaller inset settlements that affect the rural gaps between towns – are the key roles of Welwyn Hatfield's Green Belt. The distribution of 'most essential' Green Belt therefore principally reflects the fragility of gaps between towns and intervening inset settlements located along the main north-south transport links through the Borough, and also east-west between Hatfield and St Albans.

Mitigation to Reduce Harm to Green Belt

The concept of mitigation

10.19 One of the factors weighed up in the judgement of harm resulting from the release of a Green Belt parcel, is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would rate in terms of its contribution to Green Belt purposes were the parcel in question to be urbanised: i.e. would its contribution be lessened? In many cases this is a key factor in the judgement: a site might in itself be small, but its development could represent a more significant change than its physical area might suggest if, for example, this resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.

10.20 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could help to minimise the potential effects of releasing Green Belt land, although any release will still require 'exceptional circumstances' to be demonstrated.

10.21 Mitigation relates to land under the control of the site owner/developer, and could therefore apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

Mitigation themes

10.22 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. As described in the assessment methodology, the Green Belt purposes are considered to relate to the relationship between the land area in question, developed land and the countryside. This relationship is influenced by: the location of the parcel; the extent of openness within it; and the role of landscape/physical elements, including boundary features (in either separating the parcel from, or connecting it to) built-up areas and the wider countryside.

10.23 **Table 10.1** below lists some mitigation measures that could be considered as part of the development process.

Table 10.1: Potential measures to mitigate harm to Green Belt

Mitigation measure	Benefits	Considerations
Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance	Maintaining sense of separation between urban and open land	A boundary that is relatively homogeneous over a relatively long distance – e.g. the A1M along the west of Welwyn Garden City – is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of 'breaches' in such boundaries.
Strengthen boundary at weak points – e.g. where 'breached' by roads	Reducing opportunities for sprawl	The use of building and landscaping can create strong 'gateways' to strengthen settlement-edge function.
Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within the Green Belt (e.g. major roads)	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents.
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge	Reducing perception of urbanisation	This may, however, have implications in terms of reducing housing yield.
Consider ownership and management of landscape elements which contribute to Green Belt purposes	Ensuring permanence of Green Belt	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).
Preserve/enhance landscape elements which contribute to the historic setting of Welwyn Garden City, and views which provide an appreciation of historic setting and special character	Preserving setting and special character of Welwyn Garden City	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.

Mitigation measure	Benefits	Considerations
Enhance visual openness within the Green Belt	Increasing perception of countryside	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Enhance access within the Green Belt	Increasing perception of countryside	Uses of the countryside that permits an appreciation of it as a connected area with valued characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoiding truncation by major roads, or provision of access along the Green Belt boundary to strengthen its role.
Improve management practices to enhance countryside character	Increasing strength of countryside character	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain/create separation between existing washed-over settlement and new inset settlements	Minimising urbanising influences that could weaken the justification for retaining the washed-over settlement's status	
Design road infrastructure to limit perception of increased urbanisation associated with new development	Reducing perception of urbanisation	Increased levels of 'activity' can increase the perception of urbanisation.
Using sustainable drainage features to define/enhance separation between settlement and countryside	Strengthening separation between urban and open land	

Beneficial Use of Green Belt

10.24 The purposes of Green Belt do not make any reference to the quality or use of land falling within the designation, but the NPPF, at paragraph 136, states that:

> *'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can*

endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.'

10.25 Paragraph 138 of the NPPF states that plans *'should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'.*

10.26 The NPPF suggests types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary/buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.

Potential opportunities to enhance use

10.27 Many of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land's future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 10.2** below.

10.28 Beneficial uses could be achieved through legal agreements in conjunction with the release of land and consent for development. The Housing White Paper also stated in paragraph A62 that the Government will be exploring whether higher contributions can be collected from development as a consequence of land being released from Green Belt.

Table 10.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

10.29 It is recommended that the consideration of opportunities to enhance the beneficial use of Green Belt land could be informed by the Borough's Green Infrastructure Structure Plan (2011) and any subsequent updates required.

Release of Green Belt land

10.30 As noted in **Chapter 2**, the NPPF requires changes to the Green Belt to be made through the Local Plan process. If such changes are made, this should include:

- demonstration of exceptional circumstances; and

- consideration of the need to promote sustainable patterns of development, such as a range of settlement specific, local, regional and national issues such as economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.

10.31 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the Green Belt. In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt.

10.32 In developing an 'exceptional circumstances' case it is necessary to look at the objectively assessed needs for development, the need to promote sustainable patterns of development, and whether these needs can be accommodated without releases from the Green Belt. These considerations should be balanced against an assessment of whether the release of land from the Green Belt would provide sustainable development options that have significant potential to attract investment and stimulate growth and which are not available in other neighbouring areas.

10.33 The NPPF sets out a series of measures that Local Authorities have to demonstrate have been considered before proposing to amend their Green Belt boundaries. This requires that a strategy:

a. '*makes as much use as possible of suitable brownfield sites and underutilised land;*

b. optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c. *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground*.' [Para 137].

10.34 Paragraph 138 of the NPPF also notes that when revising Green Belt boundaries land which has been previously developed and/or well served by public transport should be given first consideration. Furthermore, plans '*should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*.'

10.35 Should the Borough of Welwyn Hatfield decide to release additional land from the Green Belt outline policy guidance or masterplans should be prepared as part of or following on from the Local Plan process. Masterplans should draw on the findings of this Green Belt Assessment to indicate precise development areas, new defensible Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments so as to mitigate harm to the wider Green Belt.

LUC

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