

WELWYN HATFIELD GREEN BELT STUDY STAGE 3

Further Comments on the Methodology

Woolmer Green Parish Council and Knebworth Parish Council

December 2018

1. This note has been compiled on behalf of the Parish Councils of Woolmer Green and Knebworth by Jed Griffiths MA DipTP FRTPI, of Griffiths Environmental Planning. It is made in response to an invitation by the Inspector examining the Welwyn Hatfield Local Plan to make further comments on the Welwyn Hatfield Green Belt Study Stage 3.
2. The Study, prepared by LUC Consultants, was published by Welwyn Hatfield Borough Council in August 2018. Stage 5 of the Examination Hearings into the study and its conclusions were held on the 6th and 7th November 2018. On 21st November, the Programme Officer sent an email on behalf of the Inspector to all Stage 5 representors asking for further views on the consistency of the methodology.
3. The views of the Parish Councils on the Study were contained their pre-hearings statement of 17th September, elaborated at the Hearings. It is clear that the Inspector considers the overall methodology to have been sound. The comments set out below, therefore, relate to the application of the process to the areas around the village of Woolmer Green.
4. For the assessment, the Study defined five parcels around Woolmer Green (P1 – P5). In Appendix 6.1, the detailed findings show that all these areas, as a whole, are rated as “very high” or “high”. As indicated in previous representations, the Parish Councils strongly agree with these findings, as they testify to the sensitivity of the Green Belt surrounding Woolmer Green. There is a particular concern about the vulnerability of the gap between Woolmer Green and Knebworth, which is endorsed by the assessments.
5. In these circumstances, there is a major inconsistency in the Study, in that some of the parcels have been sub-divided to assess the possible harm to the Green Belt by releasing parts of the parcel. This applies particularly to Parcel P3 where four other scenarios have been assessed. In the view of the Parish Councils, this process distorts the results of the overall assessment of P3. With an assessment of “very high” this highlights the importance of the Green Belt in maintaining the gap between Woolmer Green and Knebworth.

6. The Parish Councils' detailed representations on the individual sites within this parcel will be made in connection with Stage 6 of the Examination. In terms of the Green Belt Study, the inclusion of the areas already rejected by the Borough Council in the submitted Local Plan causes confusion. With regards to site HS15, Woolmer Green Parish Council has stated its objection to its inclusion in the Local Plan. The assessment in Scenario P3c is therefore rejected. Local Plan Allocation HS15 is part of a much more extensive area of agricultural land, which contributes considerably to the openness of the Green Belt on the northern edge of the village. The argument that it is "contained" by urban development diminishes the point about its open character. Two photographs are attached, showing how the site is absorbed into the wider landscape.
7. The need to protect the Green Belt gap between the two villages has been raised by the publication of the draft Main Modifications to the North Hertfordshire Local Plan. These show that the Examination Inspector for North Hertfordshire will be accepting the proposals in the Local Plan for the expansion of Knebworth by a net increase of 736 dwellings. Three large sites are proposed, to the west and the east of the village. To the east, the entire site (policy KB2) would contain 200 dwellings (see Main Modification 288). The southern edge of this area includes land in the ownership of Swangleys Farm, which extends over the District boundary into Woolmer Green Parish. In representations made by Knebworth Parish Council and others against this allocation, many concerns were raised about the amount of traffic which would be generated. In response the Main Modifications propose traffic assessments to consider proposals to mitigate the effects of the proposed housing developments.
8. On the east side of Knebworth, it is expected that one of the potential solutions would be a bypass road running from north to south. This would relieve traffic congestion on the B197 Great North Road and the village centre. To the south of Knebworth, however, it could join with the B197 in the gap between Knebworth and Woolmer Green. It is clear that, if the housing allocations to the east of Knebworth were to go ahead, there would be additional pressures on the Green Belt. This strengthens the case for the protection of the gap to the north of Woolmer Green.
9. More detailed points about the Local Plan policies relating to Woolmer Green will be made in connection with Stage 6 of the Examination. In terms of the Green Belt Study, however, it is clear that the way in which the methodology has been applied has been inconsistent. With its complexity it has raised more problems and issues than are necessary.

12th December 2018