

#### **Green Belt Assessment Addendum**

# Proposed development at former Hook Estate and Kennels, Firs Wood Close, Northaw Park

On behalf of Swing Limited

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#### **Document Management.**

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#### 1. Introduction

- 1.1. This report has been prepared on behalf of the client, Swing Limited as an addendum to the Green Belt Assessment (P2O-0497 Rev. V3 (September 2023)), which accompanied the outline planning application for a proposed extra care facility (hereinafter referred to as the 'proposals') on the former Hook Estate and Kennels site, Northaw, near Potters Bar, Hertfordshire. The addendum has been prepared in response to a report prepared by Wynne-Williams Associates (WWA) on behalf of Welwyn Hatfield Borough Council (WHBC), which reviewed the Green Belt Assessment (GBA).
- 1.2. Effects on the Green Belt are covered in section 5 (pages 10 to 11) of the WWA review which does not include paragraph numbers but is paginated; relevant page numbers are quoted in this addendum for ease of reference.

## 2. Response to the Review by Wynne-Williams Associates

- 2.1. In the first paragraph on page 10, the WWA used the terminology 'suggests' when quoting from the GBA assessment at paragraph 3.16, the text included at the paragraph with the GBA is factually correct on this matter and is purely setting out the context of the site and proposals with regards to purpose C as set out in the National Policy Framework (NPPF) as one of the five purposes of the Green Belt.
- 2.2. The fact that the site can be classified as previously developed land is a material consideration when assessing effects in relation to the Green Belt.
- 2.3. The WWA then sets out in the following paragraphs on page 10 the policy text relating to paragraph 145 of the NPPF, and the text in the Planning Practice Guidance (PPG) (Paragraph: O01 Reference ID: 64-001-20190722) which covers which factors should be a consideration when considering the potential impact of development on the openness of the Green Belt which is the same text quoted in the GBA at paragraph 1.4.
- 2.4. In the first paragraph on page 11 of the WWA, the author proceeds to include a number of quotes from the GBA which they claim acknowledge that the site contributes to the openness. As clearly demonstrated by the GBA the author did not at any point state that the site does not contribute to the openness, but as acknowledged in both the GBA and WWA openness has both a visual and spatial element, it is therefore not appropriate for the author of the WWA to select short, clipped quotes from the GBA which do not accurately represent to the detailed assessment carried out within the GBA which included analysis on both spatial and visual aspects.
- 2.5. Similarly, in the second paragraph on page 11, the WWA also quotes from the GBA with regard to the timescales of the proposals and the level of activity associated with the proposals. What the WWA fails to acknowledge is that the GBA clearly sets out that both of these considerations have been taken into account in the GBA analysis and concluding assessment. It is also worth noting that both of these considerations have to be assessed when considering impacts on openness as set out in the PPG (Paragraph: 001 Reference ID: 64-001-20190722) and that the level of activity is anticipated to be similar to other residential



neighbourhood in the locality such as Firs Wood Close and Hock Lane which are both currently washed over by the Green Belt designation.

- 2.6. In the penultimate paragraph of section 5 the author of WWA states that in their view the impact of the proposals is underplayed, with the final paragraph stating that it is in their professional opinion that the preceding assessment 'clearly describes the open nature of the site against the proposal of a new retirement village', however, we do not agree with this conclusion for the following reasons.
- 2.7. Firstly, the WWA makes a point of setting out the wording within the (PPG Paragraph: OO1 Reference ID: 64-OO1-20190722) which clearly states that openness is capable of having both a spatial and visual aspect. The WWA however appears to have focused their critique of the GBA frequently clipping quotes to exclude the parts which consider the visual aspects of openness in great detail. Therefore the quotes included in the WWA are not an accurate representation of the assessment or findings of the GBA.
- 2.8. Secondly, whilst it is anticipated it was likely to be beyond the scope of their appointment to carry out their own assessment of the anticipated impacts of the proposals on the openness of the Green Belt, it is not considered that the author of the WWA is well enough informed as to both of spatial and visual impacts on the openness given that their review is focused on quoting parts of the GBA they do not agree with rather than coming to their own conclusions by referencing viewpoints/views, conducting a site visit to verify the assessments or acknowledging the current Green Belt assessment and extent of the land parcel which the site is located or the extent of the Green Belt designation in this location.
- 2.9. Finally, it is not considered that the findings and assertions presented in the WWA can be relied upon as they fail to acknowledge the heavily wooded context in which the site is located, or the nearby existing built form which are both key factors when assessing the visual aspect of openness in this locality and considering the openness of the site.



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