

Mr Melvyn Middleton
C/O Louise St John Howe
Programme Officer
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30 October 2019

Dear Mr Middleton

[Welwyn Hatfield Local Plan Part 2 – Green Gap Assessment Final Draft Report August 2019](#)

[Land at Skimpans Farm, Bulls Lane, Welham Green - WeG6 \(LUC land parcel 59a\)](#)

[On behalf of Landform Welham Green Limited](#)

Introduction

Cooper Landscape Planning has been asked to review Examination documents EX160 (Green Gap Assessment Final Draft Report August 2019 and EX160A and EX160B (supporting appendices). It is understood that the assessment will inform the draft gap policy now proposed for Welham Green, noting that Site WeG6 has been assessed as being of only ‘moderate harm’ in the LUC Green Belt assessment and suitable for release for development.

The Green Belt

The five purposes of the Green Belt (NPPF, para 134) are all well established and include the avoidance of coalescence, and exceptional circumstances are required to change the Green Belt. Accordingly adding a gap policy to a Green Belt is superfluous and appears to be little more than an attempt to create an unnecessary ‘Super Green Belt’, in order to introduce an additional constraint restricting development where otherwise it has been found to be acceptable.

The Draft Gap Policy

The need and validity of introducing a gap policy at this time is flawed. However, notwithstanding our reservations against the gap policy, if it is decided to proceed then it should be noted that the blanket appraisal approach used is technically incorrect. Gaps should only include those parcels of land that are strictly necessary, considering openness, the nature of urban and landscape edges, and the gap should use landscape features that are clearly visible on the ground. The landscape features necessary for the gap should be clearly understood, identified and utilised in the gap. However, this is not the approach of the Council as LUC have washed over the whole area between settlements to create the proposed new gaps, without objectively assessing either the landscape boundaries within them, or the contribution between different land areas.

The result of this is that WeG6 has been included in the draft gap policy when the Green Belt assessment shows that it does not properly contribute to any gap and is acknowledged as being suitable for development with a rating of only ‘moderate harm’. It is clear when viewed on the ground that development at WeG6 could be accommodated without harm to the separation between these two settlements and the draft gap policy, if it is retained, should be amended to correct this error of assessment.

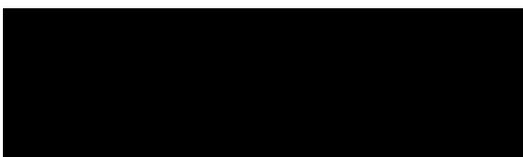
The potential effect on the gap is demonstrated within the table below.

Gap Criteria stated in daft policy	Effect on the gap proposed by LUC	Effect of developing WeG6 (Skimpans Farm)?	Is the resultant Gap enough if WeG6 (Skimpans Farm) were to be excluded from the proposed gap?
Avoidance of coalescence between Welham Green and Brookman’s Park	Coalescence avoided	Coalescence still avoided	Yes, coalescence still avoided
Would each settlement retain its own identity?	Yes	Yes, as at present	Yes, as at present
Would there be an experience of travelling through rural countryside between the two settlements?	Yes	Yes, the gap between Station Road houses and Brookman’s Park would remain unchanged, and the change in gap at WeG6 (Skimpans Farm) would be perceived as being effectively none.	Yes, there would be no change in how the gap would be perceived
Ensure that development will not mask the valley between the two settlements	The valley is largely masked by trees in this location	The valley would remain largely masked by trees in this location, and these trees could be supplemented	Yes, there would be no change as the existing trees referred to surround the site and would be retained
Ensure a rural setting for both settlements	The setting in this location is one of tree cover	The setting in this location would remain one of tree cover	Yes, the setting in this location would remain one of tree cover

Gap Criteria stated in daft policy	Effect on the gap proposed by LUC	Effect of developing WeG6 (Skimpans Farm)?	Is the resultant Gap enough if WeG6 (Skimpans Farm) were to be excluded from the proposed gap?
Ensure there would be no intervisibility between the two settlements	There is none	There would remain no intervisibility	Yes, there would remain no intervisibility
Public access would need to be maintained	No change	WeG6 (Skimpans Farm) would enable Improvements to public access	Yes, but improved.
Conclusions	There is no need for a gap in Green Belt land.	If there is a gap, then WeG6 (Skimpans Farm) should not be included.	The remaining gap would be enough to achieve the gap purposed set out by LUC.

I trust that you will be able to accommodate these comments.

Yours sincerely



Julian Cooper

Director

COOPER Landscape Planning

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