

Representation re Green Gap Assessment Final Draft Report August 2019

All documents put forward as part of the examination process need to be sound, accurate and compliant with current NPPF guidelines. A review of this document indicates a level of doubt whether it meets these criteria. By focussing solely on gaps the authors of this document have omitted to consider the implications of potential development where Welwyn Hatfield's boundary runs through a built-up area, which means that their assessment of the impact of reducing the gaps is seriously flawed.

This is exemplified by the treatment of the Little Heath – Swanley Bar – Brookmans Park gaps. Little Heath (as acknowledged in the report) is a northern suburb of Potters Bar, so any expansion of Little Heath towards Swanley Bar and Brookmans Park is therefore an expansion of Potters Bar. This is not explicit in the report. Furthermore, the area shown as Little Heath on the plan is incorrectly drawn, since it does not acknowledge the significant part of Little Heath which lies in Hertsmere and gives the impression that Little Heath is wholly in Welwyn Hatfield. The boundary between Welwyn Hatfield and Hertsmere is not the boundary of Little Heath; if anything the centre of Little Heath is on the Hertsmere side of the boundary on the former site of St. Michaels and All Angels in Church Road, also the site of the former Little Heath sub Post Office. This means that narrowing the gaps between Little Heath and Swanley Bar, and between Swanley Bar and Brookmans Park, will have the effect of nearly joining Brookmans Park to Potters Bar and almost doubling the length of built-up urban sprawl from the M25 northwards. The existing 1km gap between Potters Bar and Brookmans Park is already dangerously narrow and reducing it to less than half of that (somewhere between 250m and 350m as indicated in the report) is not in line with the NPPF or Government guidance. Moreover, since this document was produced Esther McVey has re-emphasised her support for the guidelines in the NPPF, saying "It is only in the most exceptional circumstances we turn there [the Green Belt]." Specifically, the NPPF highlights the need to avoid urban sprawl. The chart at the bottom of this representation presents this pictorially.

As Potters Bar is predominantly in Hertsmere there are demonstrable cross boundary issues associated with any expansion northwards towards Swanley Bar and Brookmans Park. It is for this reason that Hertsmere MP Oliver Dowden has taken such a strong interest in Welwyn Hatfield's proposals in this area. This very important cross boundary aspect appears to have been missed and the report does not properly address the true impact of development in Welwyn Hatfield expanding another council's settlement.

I therefore do not consider this document should be used in Local Plan preparation as it omits critical detail and does not appear to have taken a strategic look at the entire area, including cross border implications.

