

**BY EMAIL AND POST**

Mr Melvyn Middleton  
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30 October 2019

Dear Mr Middleton

**WELWYN HATFIELD BC LOCAL PLAN**

**EX160 – GREEN GAP ASSESSMENT FINAL DRAFT REPORT (AUGUST 2019)**

**EX156 – LANDSCAPE SENSITIVITY DOCUMENT (JULY 2019)**

Further to your email dated 6 October 2019 regarding five additional documents submitted to the Welwyn Hatfield Local Plan Examination.

You have raised concerns over the past 12 months, not least in relation to the need to progress without further delay and requests that the Council publishes 'non-Green Belt material immediately', and we share your concerns on these matters.

We wish to raise further concerns about the fragmented way the evidence base is being added to, as this is making any objective assessment problematic at best. This approach appears to be introducing untested and self-serving evidence intended to exclude development from areas where it has otherwise been found to be acceptable, in order to justify a predetermined outcome, whilst giving the appearance of objectivity.

In respect of EX160 and supporting appendices, Cooper Landscape Planning has prepared a separate technical note addressing the content of the Green Gap Assessment. Cooper Landscape Planning has produced a second technical note, this letter, in respect of the Landscape Sensitivity document prepared by LUC (EX156).

Cooper Landscape Planning comments on this document are as follows:

- this is a strategic review in parallel to the Green Belt study (1.3 and 1.2), yet inexplicably there is no mention of this within the supporting Green Belt study.
- We note that there are no key sensitivities attached to LSCA 54A;
- there is no justification why WeG6 should be within LSCA 54a, rather than 29b (Fig 3.1);
- in their text LUC recognise the barrier of the railway line limiting the urban influence of the urban edge (P210), where the railway line forms the boundary between moderate and low-moderate sensitivity.
- Skimpans Farm is identified later in page 210 : *to the west of the railway line, where the land slopes down to a shallow wooded valley which contributes to the settlement setting and to distinction from Brookman's Park;*

- the definition of 'moderate sensitivity' goes back to the definition in Table 2.4 which states that *'the landscape has some distinctive characteristics and valued qualities, with some sensitivity to change as a result introducing built development'*.

By way of conclusion:

- **Skimpans Farm has low – moderate sensitivity;**
- **it should be part of LSCA 54a;**
- **there would be no harm caused by development of this site to the separation of Welham Green to Brookman's Park**
- **neither would there be harm to the setting of Welham Green;**
- **development of Skimpans Farm could provide new public access to the countryside.**

Yours sincerely

Julian Cooper FLI  
Director  
**COOPER** Landscape Planning