

BY EMAIL AND POST

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Dear Mr Middleton

WELWYN HATFIELD BC LOCAL PLAN
EX160 – GREEN GAP ASSESSMENT FINAL DRAFT REPORT (AUGUST 2019)
EX156 – LANDSCAPE SENSITIVITY REPORT (JULY 2019)

Introduction

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.

With respect of EX160 and supporting appendices, Cooper Landscape Planning has already prepared a technical note addressing the Green Gap Assessment. This is now supplemented by this letter, which deals with the Landscape Sensitivity document prepared by LUC (EX156).

Landscape Sensitivity Report EX156

Our comments on EX156 with reference to the landscape sensitivity generally, and on Skimpans Farm in particular, are set out below.

In general terms:

- EX156 is a strategic review which is stated to run in parallel to the Green Belt study (Paragraphs 1.3 and 1.2), yet inexplicably there is no mention of this within the supporting Green Belt study;

- it is logical to consider that a sensitivity study, if one is needed, should have been carried out before the local plan, not afterwards, perhaps even the first study to be carried out to inform the local plan examination; and
- this adds to our concerns that the local plan evidence base is being added to in an inappropriate and confusing way.

In terms specific to WeG6 Skimpans Farm:

- Skimpans Farm is described (page 210) in the following terms: *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;*
- It follows that there are two matters that have led LUC to propose a moderate sensitivity on Skimpan's Farm, namely *the setting of Welham Green* and the *separation between Welham Green and Brookman's Park;*
- in terms of the setting, Skimpans Farm is a small enclosed site with few public views and strong visual enclosure, therefore it is difficult to see how development can affect the setting to any significant degree;
- in terms of the separation with Brookman's Park, LUC recognise (also page 210) that the barrier of the railway line limits the influence of the urban edge, that the railway line forms a clear boundary; therefore, these landscape characteristics form a distinction between Skimpan's Farm and Brooklands Park – in which case it is difficult to see how this separation of settlements could be harmed by development; and
- either way, there are no key sensitivities attached to any parts of LSCA 54a and therefore development at Skimpan's Farm cannot harm those sensitivities.

In terms of landscape sensitivity:

- the LUC sensitivity study gives a score of 'low - moderate' sensitivity for the landscape character area LSCA 54a, but then gives two reasons, incorrectly in our view, why Skimpan's Farm should be increased to moderate;
- the first reason is the distinction between Welham Green and Brookman's Park - we consider that this should not apply because there is no visual or physical connectivity between the two settlements;
- the second reason is the setting of Welham Green – we consider that this should also not apply because this setting is a characteristic that is common with all of LSCA 54a, not just Skimpan's Farm - if anything the setting is in our view more important to the more open area to the east of the railway, than that of the enclosed and inward looking area of Skimpan's Farm; and
- in any event, the definition of 'moderate sensitivity' does not exclude development as the LUC definition in Table 2.4 states that *'the landscape has some distinctive characteristics and valued qualities, with some sensitivity to change as a result introducing built development'* - from which it will be seen that there is no reason why development could not be introduced at Skimpan's Farm.

Conclusions

We conclude that:

- Skimpans Farm should also be defined as low- moderate sensitivity, thereby conforming to the rest of LSCA 54a;
- there would be no harm caused by development of this site to the separation of Welham Green to Brookman's Park

- there would be no more harm created on the setting of Welham Green by developing Skimpans Farm than other parts of the character area;
- such development could occur sensitively at Skimpans Farm, within clearly defined boundaries; and
- development of Skimpans Farm would provide benefits in terms of new public access to the countryside, a matter ignored by the study.

Yours sincerely

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Director
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