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01 November 2019

Our Reference: 247201

Dear Sir/Madam,

**Welwyn Hatfield Local Plan (2013-2031) Examination  
October 2019 consultation on new examination documents**

On behalf of the Potterells Farm Partnership and their interest in land at Potterells Farm (WeG15), Welham Green this letter responds to your email of 06 October 2019 and the Welwyn Hatfield Borough Council (WHBC) Local Plan consultation published by the Inspector in relation to new examination documents. This response focuses on LUC's Green Gap Assessment Final Draft Report August 2019 (EX160, EX160A and EX160B).

The recommendation in the Green Gap Assessment that 'gap policy areas' are introduced into the submitted Local Plan without any consideration of the implications for addressing the identified shortfall in the meeting local housing need and the implications for the associated spatial strategy is wholly inappropriate. In the absence of any consideration on the direction or implication of changes to the submitted Local Plan, which has already been confirmed as unsound during the examination, then the strategy on which it is based continues to fail the tests of soundness set out at NPPF (2012) Para 182, especially that it has been positively prepared to meet objectively assessed development requirements, and is justified representing the most appropriate strategy.

It is also unclear whether such a policy, which seeks to ensure future development protects settlement patterns and maintains a sense of separation between settlements, alongside other proposed changes to the plan could significantly change the submitted Local Plan to a fundamentally new Plan.

The approach to defining the extent of the proposed gap policy areas in relationship to the affected settlements is ambiguous. Specifically, in relation to WeG15, we object to the extent of the proposed gap policy area between Welham Green and Brookmans Park, which covers an area at the south of site.

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Whilst there is a physical gap in this location that effectively provides a sense of separation between the two settlements we strongly disagree that any development within WeG15 would erode this gap, contribute towards the coalescence of the settlements or compromise the experience of travelling through countryside between the settlements.

Features that are referred to within the gap, including Mimmshall Brook, which lies within the Water End Swallow Holes SSSI, and a PROW, lie to the south of site and would not be adversely impacted by any development at WeG15. Indeed, the land south of WeG15 is also in the ownership control of the Potterells Farm Partnership and is proposed as providing publicly accessible strategic green infrastructure, including new structural woodland belts along the southern and western boundaries to supplement existing hedgerows and delineate the extent of development. Mimmshall Brook and the valley that divides the settlements would remain a strong feature of the gap.

Importantly, the proposed development at WeG15 is in line with the existing development along Station Road and would not extend the built extent of Welham Green any further south. The provision of a woodland belt along the southern boundary would screen the new houses to ensure a sense of travelling through the countryside between the settlements and the rural setting to Welham Green is retained. The proposed development at WeG15 would not create a visible edge at Welham Green when viewed from Brookmans Park. In considering the interface at this south western edge of Welham Green it is important to note that the site's character is already heavily influenced by urban features, especially its enclosure on two boundaries by settlement, which are visible to the north and east of the site.

Finally, we would highlight that the submission of individual evidence base documents as examination documents without any consideration on the direction or implication of changes to the submitted Local Plan is unhelpful and continues to contribute to a protracted examination process.

We would respectfully ask that these comments are considered during the examination moving forwards.

Yours sincerely,

Alex Chapman  
Technical Director

cc

Johnny Carew Pole

Potterells Farm Partnership