

Examination of the Welwyn Hatfield Local Plan 2013 – 2032

Regulation 19 (Submitted Sites)

Brookmans Park

Policy SADM 31, Site HS22 (BrP4)

Land west of Brookmans Park Railway Station

Statement on behalf of CPRE Hertfordshire by

Jed Griffiths MA DipTP FRTPI

April 2020

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the Campaign to Protect Rural England Hertfordshire (CPREH). It has been compiled in response to an invitation by the Examination Inspector to submit further material for consideration at the Stage 8 hearing sessions. This statement addresses the matters, issues, and questions relating to land to the west of the railway station at Brookmans Park. The site was allocated for housing in the Draft Local Plan under Policy SADM 31, Site HAS22 ((BrP4).
2. Earlier representations, objecting to the allocation, were made by CPREH at the Regulation 19 stage. Where appropriate, references will be made to the original statement of objection, and to representations made at earlier hearing sessions. The main purpose of this statement, however, is to respond to the issues and questions raised by the Inspector in the schedule published on 17th March 2020.

Matter 1 – Environmental Consideration (Questions 67 – 84)

3. CPREH notes the issues with regards to flood risk and drainage set out by the Inspector under Matter 1. The main concerns of CPREH are with the off-site risks associated with the proposed development of 250 dwellings on the site, particularly the potential impact on the hamlet of Water End and the adjoining Swallow Holes Site of Special Scientific Interest (SSSI).
4. Other representors, in particular the North Mymms District Green Belt Society and the Water End Residents' Association have described these issues in some detail. CPREH supports these views. The Water End Swallow Holes SSSI is designated under Section 28 of the Wildlife and Countryside Act 1981 and is of major importance. The file reference describes the SSSI thus:

“The Water End Swallow Holes are the only major sinkholes in chalk which are a permanent feature of the landscape, and they constitute the drainage outlet for the largest karstic basin in England.”

5. The Swallow Holes are fed by the Mimms Hall and Skimpans Brooks, which converge on the site. At times of excessive flooding, a lake with surface water accumulates in the sinkhole basin. This water normally drains away naturally, but at times it backs up and floods the northern part of Water End. With the effects of climate change, these incidents are becoming more common. The problems could be exacerbated with excess surface water draining from the proposed development of HS22. This would be contrary to paragraph 109 of the National Policy Framework (NPPF).

6. The site lies in a very open area, which is separated from Brookmans Park by the East Coast main railway line. In a landscape assessment of 2012, The Borough Council considered the site to be of “high sensitivity” with a “low capacity to accommodate change.” In the more recent Landscape Sensitivity Assessment of July 2019 (EX156), the site was included in sub-area 29c, with a sensitivity rating of “moderate/high”. This conclusion was endorsed by CPREH in its comments on the report. The site is currently in use as arable land, and occupies a key strategic location in the gap between Potters Bar and Hatfield. It is the firm view of CPREH that it would be impossible to mitigate the effects of building 250 dwellings in this open tract of countryside.
7. The promoters of the site have also argued that a landscape buffer could be used to mitigate the effects of the development on Brick Kiln Wood, to the west of the site. Brick Kiln Wood is a designated wildlife site (WS144) and an ancient woodland. In view of the sensitivity of the woodland habitat, and its range of species, CPREH believes that any screening would not mitigate the urban fringe pressures arising from 250 houses.
8. CPREH shares the concerns raised by local representors about the deficiencies in local infrastructure and the pressures that would arise from the proposed development. Of particular concern to CPREH is the impact on the capacity of the local road network. The main access to the site would be from Station Road, via a new bridge over the railway line. Apart from the constructional difficulties, there would be a major increase of traffic on Station Road between Brookmans Park and Welham Green.
9. Current policy on highways and transport is found in the County Council’s Local Transport Plan (LTP4), which seeks to protect rural roads and lanes. CPREH has supported this particular policy. The development of HS22 would undoubtedly threaten the capacity and the character of rural roads in the local area. There is particular concern about the impact on Bradmore Lane, on the northern edge of the site. This a quiet rural thoroughfare, much used and appreciated by walkers, cyclists, and horse riders. Similar pressures would occur in Warrengate Road, Water End.

Matter 3 – Sustainability (Questions 99 and 100)

10. The promoters of the site have claimed that the site is sustainable, mainly because of its proximity to Brookmans Park railway station, and the village centre. In response, CPREH believes that the environmental factors associated with this site far out-weigh the social and economic benefits of the proposed development. This balance has not been appropriately addressed in the sustainability appraisal.

Matter 4 – Green Belt (Questions 101 – 112)

11. The Inspector has referred to the Stage 3 Green Belt Review (EX99A-E), in which the site was part of assessment parcel P65. The overall harm assessment of parcel P65 was “high”, although the site itself was also assessed as sub-parcel P65a, with a rating of “moderate-high”. In view of these ratings, CPREH was surprised that the site was not included in an area of “most essential Green Belt.” The Stage 3 Green Belt Review, however, was followed by the Green Gaps Assessment (EX160), which indicated that the site was located in the important strategic gap between Hatfield and Potters Bar. The report also assessed the local gap between Welham Green and Potters Bar and recommended that this should be included in the Local Plan as a Green Gap Policy Area. CPREH has supported this recommendation.
12. Following the updating of the evidence base, the Council Cabinet has recommended that the allocation of site HS22 for housing should be removed from the Draft Local Plan, on Green Belt and landscape grounds. In its response to the current consultation on site allocations, CPREH has fully endorsed this recommendation and welcomes the formal recognition by the Borough Council of the significant contribution that the site makes to the Green Belt.
13. In response to the Inspector’s questions on harm, CPREH agrees that the assessment of high harm is appropriate to the whole of site HS22 and the contribution that it makes to the Green Belt. As stated in the CPREH Regulation 19 submissions, the development would have a major adverse impact on the stated purposes of the Green Belt, in particular causing major encroachment of built development into the open countryside and urban sprawl. The effect would be exacerbated by the impact of new infrastructure associated with the development, including road and cycle bridges over the railway. These urban influences would exert considerable harm to what is largely an undisturbed tract of open Green Belt countryside.
14. In summary, CPREH believes that the allocation is neither justified, nor effective, nor consistent with national policy as set out in the NPPF 2012. There are no exceptional circumstances which justify its release from the Green Belt in this sensitive location.
15. With regards to Question 105, CPREH has noted that the 2019 Green Gap Assessment emphasised the strategic contribution which the site (together with the adjacent site BrP5) makes in maintaining the gap between the towns of Hatfield and Potters Bar. More locally, it protects the gap between Welham Green and Brookmans Park. The visual perception of the gap between the two villages is pronounced to the west of the railway. From east to west, the retention of the gap between Brookmans Park and Water End is also important in landscape terms.

16. In answer to Question 109, with regards to the proposed site boundaries, the promoters have asserted that the railway line forms a very firm boundary to the east of the site. On the contrary, CPREH would argue that it provides a very firm line between Brookmans Park and the open countryside beyond. The southern boundary to the site, along the Ray Brook, is very open – CPREH is concerned that there would be a very narrow and vulnerable gap between HS22 and the main campus of the Royal Veterinary College. The western boundary would be defined by Brick Kiln Wood, the sensitivity of which has been described in paragraph 7 above. To the north is Bradmore Lane, the rural character of which would be destroyed by the proposed development (see paragraph 9 above). In summary (Q110), CPREH considers that the proposed boundaries cannot be more robust than the existing one, which has protected the countryside to the west of the railway from development of over 60 years.
17. The issues and questions relating to this site clearly embody the conflict between national policy to build more housing and the potential harm to the Green Belt. CPREH assumes that the Borough Council now understands the need to protect the Green Belt, resulting in their wish to delete the allocation of this site from the Draft Local Plan. This intention, contained in the current consultation on site allocations, is welcomed by CPREH.

Matter 5 – Implementation (Question 113)

18. CPREH notes that a key element of infrastructure would be the construction of a new bridge over the main railway to provide the main access to the site. This is likely to be costly and it has not been programmed. Completion of the number of dwellings within the plan period is therefore questionable.

Jed Griffiths MA DipTP FRTPI

Hertford

21st April 2020