

Examination of the Welwyn Hatfield Local Plan

Water End Residents Group Statement for the Stage 8 Hearing

Policy SADM 31, Site HS22 (BrP4), Land west of Brookmans Park Railway Station

Matter 4 Green Belt

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The National Planning Policy Framework stresses that the government attaches great importance to Green Belts and says that Green Belt boundaries should only be altered in exceptional circumstances.

The Council carried out a stage 3 Green Belt Review in 2018/19 in order to ascertain the contribution that a finer grain of sites, than were previously examined, around the urban fringes within the district, made to the different purposes of the Green Belt. In this assessment the overall harm at this site is considered to be high but the parcel is not identified as an area of most essential Green Belt. In this context:

101) Is the overall assessment of high harm a sound interpretation of the contribution that this site makes to the purposes of the Green Belt?

Response

In the Stage 3 Green Belt Study, the site is a constituent part of Parcel 65 which is assessed as 'Very High Harm'. The entire parcel, less the site, has also been identified as an **area of most essential Green Belt**.

The site was separately assessed as sub parcel P65a, and although the assessment acknowledges that the whole parcel is open and rural in character, and that expansion of Brookmans Park to the west of the railway line would weaken the integrity of adjacent Green Belt, it was considered that by retaining open land to the north of Bradmore Lane, harm would be reduced to settlement separation and consequently it was given a lower harm rating of 'High'.

We do not agree with this assessment, and strongly assert that the site should be included, along with the rest of the parcel, as 'Very High Harm' and also be identified as 'an area of most essential Green Belt'.

The larger parcel P65 was assessed as Very High Harm' because: *"The parcel is open and rural in character, therefore its release would lead to encroachment on the countryside, and its location between Brookmans Park and Welham Green means that this would significantly harm local settlement separation, also to the detriment of the wider separation between first tier towns. Expansion of Brookmans Park across the railway line would mark a significant change in settlement form and a less clearly defined Green Belt boundary, weakening the integrity of the wider Green Belt"*

All of the above criteria applies equally to the site, and the only reason given in the assessment for the lower harm rating of High from Very High is *"retaining open land to the north of Bradmore Lane would reduce harm to settlement separation"*.

The site has been given a lower harm rating simply because it is perceived that as it is smaller than the parcel it is within, it will therefore be less harmful to settlement separation. This does not accord with the following statement by LUC in Para 1.5 of the [Stage 3 Green Belt Study Addendum](#) (EX99B):

"LUC do not agree that a smaller area closer to a settlement edge necessarily makes a weaker contribution to Green Belt purposes, as a result of having greater urban influence and/or playing a smaller role in a settlement gap. Clearly the presence of a settlement will typically be stronger in close proximity to the urban edge, but our view is that Green Belt assessment cannot be considered in such granular terms without straying beyond the intentions of the designation, as reflected in the NPPF's stated Green Belt purposes. The size of an area is not the key consideration when assessing the contribution of land, or harm resulting from release; if it were then the Green Belt would consist of a multitude of small areas each making a relatively small contribution to a greater whole. Splitting a parcel into two and suggesting that the part nearest the urban edge makes a weaker contribution is arbitrary, unless there is some distinction in terms of openness or containment by urbanising influences to reduce: the relationship with the countryside; the extent to which the land forms part of a settlement gap; or the contribution to a historic town's setting/special qualities."

There is no distinction between P65a and P65 in terms of openness or containment by urbanising features.

We submitted the following comment in the [Stage 3 Green Belt Review Consultation](#):

*"We disagree with the rating of P65a as high, and argue that it should be considered as very high as it clearly makes a significant contribution to the local purpose as defined in the assessment criteria contained in Para 3.79 of the Stage 3 Green Belt Study: "Land that plays a highly significant role in inhibiting the physical or **visual coalescence** of inset settlements, such as narrow gaps that are visually open with few separating features."*

LUC responded in the [Stage 3 Green Belt Study Addendum](#) (EX99B) by stating that *"P65 as a whole would result in very high harm if released, but release of P65a would not reduce the physical distance between Welham Green and Brookmans Park"*.

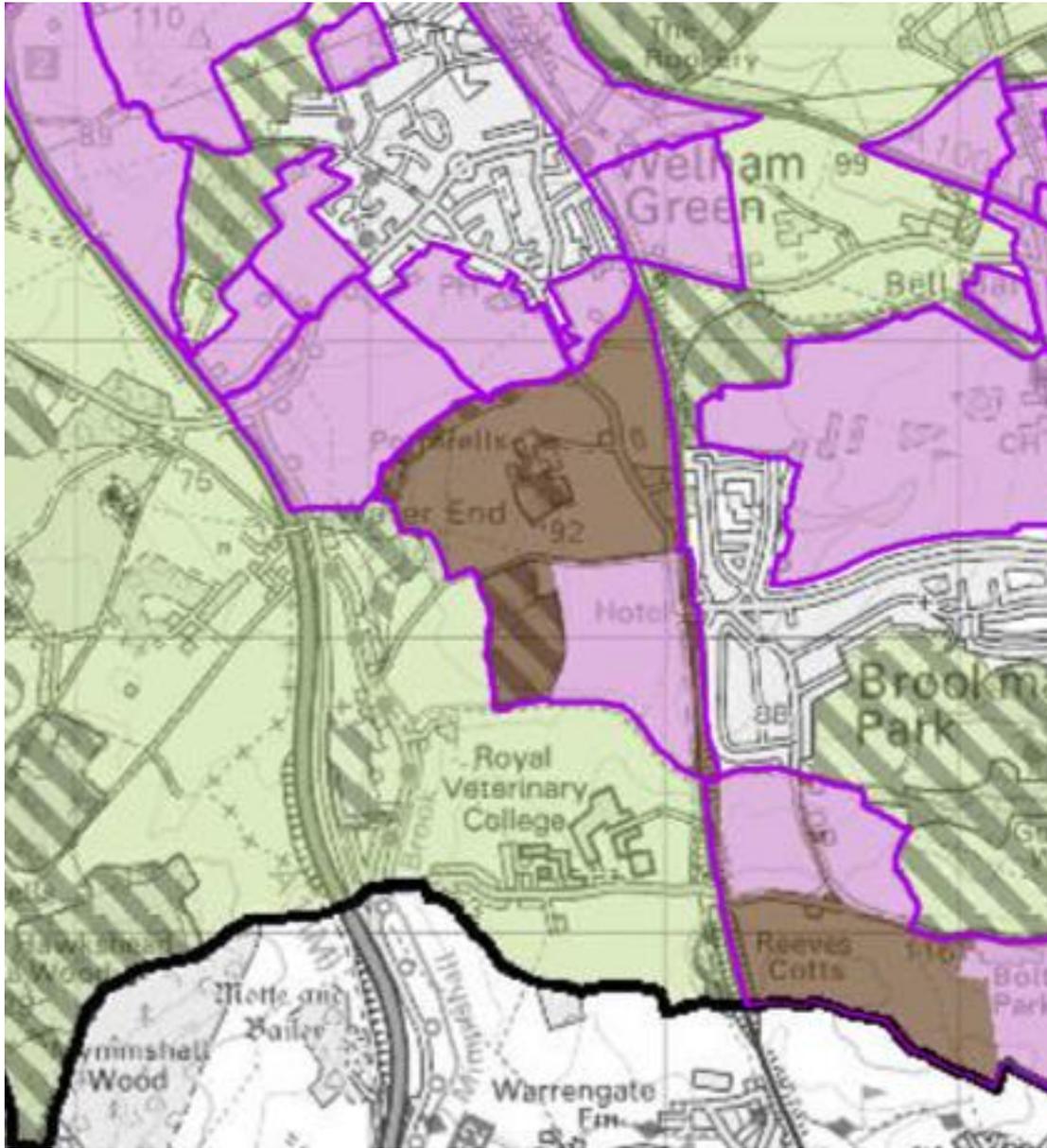
We believe that this assessment is flawed because no reference or allowance has been made for the significant impact of the site on the perception of the gap between Brookmans Park and Welham Green along the road and rail transport corridors, or for visual coalescence, even though it is supposed to be part of the assessment criteria previously mentioned.

Currently, there is no intervisibility between Brookmans Park and Welham Green. If Brookmans Park expands across the railway line there will be clear intervisibility between Brookmans Park and Welham Green. Furthermore, the site will visually coalesce with the RVC to the south.

The assessment of a reduced harm rating for P65a only considers the local gap and does not consider the impact of the site on the gap between the first tier towns of Potters Bar and Hatfield. The gap between Potters Bar and Hatfield, on the west side of the East Coast Main Line Railway, is already significantly compromised by a solar farm, RVC Major Development Site and Welham Green.

Figure 9.1 of the Stage 3 Green Belt Study (below) does not assess the site as being an area of most essential Green Belt even though it is within the same gaps (Potters Bar/Hatfield and Brookmans Park/Welham Green) and adjoined on two boundaries by an area of Green Belt that have been assessed as most essential. The majority of the Green Belt between Brookmans Park and Welham Green, on the west side of the main line railway, has been assessed as 'most essential', highlighting the importance of the Green Belt purposes in this area. It should be noted that the site is the only Brookmans Park site virtually surrounded by Green Belt that has been assessed as 'most essential', and it is astonishing that the site has not been included within the same assessment.

Figure 9.1: Areas of Most Essential Green Belt



-  Welwyn Hatfield Borough Council
-  Neighbouring councils
-  Absolute constraint
-  Green Belt
-  Green Belt parcel
-  Most essential Green Belt area

102) Can this level of harm be appropriately applied to the entire site?

Response

The site should be identified as an 'Area of most essential Green Belt', and the level of 'Very High Harm' should be applied to the entire site for the reasons stated above.

103) In that context, is the allocation of this site justified, effective and consistent with national planning policy?

Response

No, the allocation of BrP4 is not in accordance with the NPPF or with Government policy or guidance. The allocation was made for political, not planning, reasons.

105) Does the site impinge upon the existing gap in built development between Brookman's Park and Welham Green?

Response

The site will significantly reduce the perception of the gap between Brookmans Park and Welham Green. Although Brookmans Park extends further north on the east side of the East Coast Main Line (ECML) railway, the actual visual perception of the gap between Brookmans Park and Welham Green is on the west side of the railway along Station Road which connects the two settlements. Welham Green is located only 0.4 miles to the north, almost entirely on the west side of the railway line.

When exiting Brookmans Park along Station Road towards Welham Green, there is a definite perception of leaving the settlement, particularly apparent from the elevated position of the railway bridge, which enables viewing the panoramic rural vista of the site and beyond. Welham Green is clearly visible from the site and development would significantly narrow the visual perception of the gap between Brookmans Park and Welham Green by 20%. The physical gap would also be significantly narrowed by almost 50% between Brookmans Park and nearby Water End, located only 0.5 miles to the west.



View looking north towards Welham Green from Bradmore Lane



Enlarged view

107) Does the site impinge upon the existing gap in built development between Brookman’s Park and Potters Bar?

Response

There is a small gap between the southern boundary of the site and the RVC Major Development Site to the south, but because of the valley topography, the site will visually adjoin with the RVC. The gap is situated in the valley of the Ray Brook between the site and the RVC, which are both on higher ground. This will, in effect, significantly narrow the physical and perceived gap between the first tier towns of Potters Bar and Hatfield, and create the perception of extending Brookmans Park as far south as site BrP6, which was considered not suitable for allocation because the site would significantly physically and visually shorten the fragile gap between Brookmans Park and Potters Bar. The overall conclusion for Site BrP6 contained in Appendix A of *The Site Selection Background Paper 2019* states: “*Whilst Brookmans Park is a sustainable location for development, on balance the high harm on the purposes of the Green Belt and especially eroding the separation between settlements, is considered to outweigh any potential benefits of bringing the site forward. The site should therefore NOT be considered for allocation alongside other Brookmans Park sites.*”

109) Is the proposed new boundary to urban development as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

Response

The existing very strong and permanent boundary of the main line railway has successfully prevented urban sprawl and maintained the openness beyond since the inception of the Green Belt.

The proposed southern boundary (Ray Brook) will leave an extremely small and vulnerable gap that will be hard to defend in the long term between the site and the RVC Major Development Site, a short distance to the south. The RVC site has grown almost continuously since establishment in 1958 and it is inevitable that future expansion of either site will ultimately lead to coalescence between the site and the RVC with the loss of any remaining openness. As mentioned previously, there will in effect be no visual openness to the south of the site because the development would visually coalesce with the RVC buildings on the horizon.

The proposed south eastern boundary (tree belt/hedgerow with minor gaps) will leave a triangle of Green Belt with minimal openness between the site and the railway. The boundary to the west of the railway line is very weak and hard to defend in the long term and if developed in the future would result in a complete loss of openness.

The proposed north boundary of the site (Bradmore Lane) has been assessed as moderate strength, however, this only relates to its physical properties. If the boundary is assessed as ‘how likely is it to prevent further development beyond the Plan period?’ then it should be considered as weak. By crossing the strong boundary of the East Coast Main Line railway and introducing development into a previously undeveloped area, the integrity of the surrounding Green Belt will be significantly

compromised. There will be significant risk of further encroachment to the north of the site beyond the Plan period, as evidenced by the recent promotion of site BrP5 in the 2019 Call for Sites. The actual physical gap between Brookmans Park and Welham Green is on the other side of the railway line because Brookmans Park extends further northwards on the east side of the railway line. This would be used as the justification for any future adjustment of the Green Belt Boundary on the west side of the railway line. In addition, further justification would be because any changes to the boundaries in the future would be no weaker than existing. As mentioned previously the openness to the north of the site will be significantly compromised by the introduction of intervisibility between Brookmans Park and Welham Green.

The Stage 3 Green Belt Study assessments for the parcel P65 as a whole and the site P65a on its own both state: *“Expansion of Brookmans Park to the west of the railway line would weaken the integrity of adjacent Green Belt”*.