

**Examination of the Welwyn Hatfield Local Plan 2013 – 2032**

**Regulation 19 (submitted Sites)**

## **Brookmans Park**

**Policy SADM 31, Site HS 22 (BrP4))**

**Land west of Brookmans Park Railway Station**

**Statement:**

**On Behalf of North Mymms District Green Belt Society**

**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 North Mymms District Green Belt Society. It has been compiled in response to an invitation by the Examination Inspector to submit supporting material to be considered at the Stage 8 hearings. This statement addresses the matters, issues, and questions in respect of land to the west of Brookmans Park railway station. The site was allocated for housing in the Draft Local Plan under Policy SADM 31, Site HS 22 (BrP4).
2. Earlier representations, objecting to the allocation, were submitted by the Society at the Regulation 19 stage. Where appropriate, references will be made to the original statement of objection, and to other representations made at earlier hearing sessions. The main purpose of this statement, however, is to address the matters, issues, and questions set out by the Inspector in the schedule published on 17<sup>th</sup> March 2020. In addition to comments on Site HS 22, the statement will also respond to the issues and questions raised by the Inspector on Site HS 21, land to the west of Golf Club Road, and HS 23, land to the east of Golf Club Road.

### **Matter 1 – Environmental Considerations (Questions 67 – 84)**

3. As noted by the Inspector in the summary of issues, there is considerable concern about the possible contribution of the proposed development to off-site flooding. A report in support of the proposal was prepared by AECOM consultants for the owner, the Royal Veterinary College, in response to the Local Plan consultation of January 2015. The report considered that development of the site could be designed to avoid areas at risk of flooding – according to the consultants, this would remove the need to pass the Exception Test to support the development. The Society strongly disagreed with this conclusion particularly because of the proximity of the site to Water End, which is located entirely within Flood Zones 2 and 3.
4. In its objections, the Society has argued that surface water would drain to the south of the site into the Ray Brook, and from there into the Mimmshall Brook which flows northwards through Water End. Here, flood barriers were constructed along the Mimmshall Brook at the south end of Warrengate Road. Although these have been successful in protecting some properties, there is no protection for properties at the north end of Warrengate Road, which are at increasing risk from flooding.
5. The Society has also pointed out the possibility of surface water flooding to the north of the site, across Bradmore Lane. There are already substantial surface flows across the lane into a watercourse which flows northwards into the Skimpans Brook on the southern edge of Welham Green. This area is also prone to flooding.

6. Taking these factors together, it is clear that there is a cumulative flood risk associated with the proposed development of the site. It is imperative that a site-specific flood assessment is prepared in order to ascertain the overall risk to the surrounding area. The entire site lies within an SPZ1, and the use of soakaway drainage will probably not be acceptable.
7. The site is in a very open area, which was originally assessed in 2012 by the Borough Council to be of “high sensitivity” with “low capacity to accommodate change.” In the more recent Landscape Sensitivity Assessment (July 2019), the site was included in sub-area 29c, with a sensitivity rating of “moderate/high”. These conclusions are endorsed by the Society: the site is actively used as arable land, and occupies a key strategic position in the gap of open countryside between Hatfield and Potters Bar. It is inconceivable that the impact of 250 dwellings could be mitigated. This point is developed below under Matter 4 Green Belt.
8. The Water End Swallow Holes Site of Special Scientific Interest (SSSI) is located less than 500 metres to the north-west of the site. The site is of national and international importance, both in biological and geological terms. In its Regulation 19 submission, the Society drew attention to the potential effects of increased flooding, and the decline in water quality, on the integrity of the SSSI. The overall impact would be unacceptable; in view of the increased flood risk, it is unlikely that this could be mitigated.
9. Brick Kiln Wood, immediately to the west of the site, is an ancient woodland and a designated wildlife site (WS144). The promoters of the development have argued that any effects on the woodland landscape, its habitat and the range of species, would be mitigated by a landscape screen on the edge of the site. This is disputed by the Society; development of 250 dwellings in such close proximity would undoubtedly result in an unacceptable level of harm to the wood, and its flora and fauna. These urban fringe pressures cannot be satisfactorily mitigated.

## **Matter 2 – Infrastructure (Questions 65 – 98)**

10. The promoters of the site have produced a number of reports in which they consider that any harmful effects on local infrastructure can be overcome. This has been refuted by the Society and a number of other representatives. No school is proposed as part of the development. As noted by the Inspector, the Local Plan states that the on-site dwelling capacity has been limited to reflect the limited opportunity for expanding the existing Brookmans Park primary school. It has become clear that the school, located in Bradmore Way, does not have sufficient capacity. This limitation also applies to primary schools in Welham Green and Little Heath.

11. Secondary school pupils would need to travel off-site, either to Chancellors School in Brookmans Park or to Potters Bar. There does not appear to be a solution to overcome the lack of school capacity.
12. No community services and facilities are proposed on the site, with the nearest shopping centre being located at Brookmans Park, to the west of the railway. In terms of primary care health facilities, the existing practice in Brookmans Park serves the village as well as Welham Green. The surgery is near capacity, and the development would result in additional pressures on the service. These pressures would be further increased if housing allocations were to be approved in Welham Green.
13. Considerable concerns have been raised about the potential impact of the proposal on the local highway network. The promoters have shown that the main access to the site would be from Station Road, via a new bridge over the East Coast main railway. In its Regulation 19 submission, the Society has stressed the constructional problems that would ensue, together with the impact of additional traffic on Station Road and the network of local roads.
14. Bradmore Lane, on the northern boundary of the site, is an attractive rural byway which is much appreciated by local walkers, cyclists, and horse riders. Its character would undoubtedly be compromised by the increase in traffic associated with the development. There would also be pressure on Warrengate Road and other rural lanes in and around Water End. Warrengate Road is also part of the Great North Way national cycle route between Hadley Wood (North London) and Stotfold (Bedfordshire). Any widening in Warrengate Road would harm the setting of five Grade II listed buildings and the amenity of local residents.
15. The development would have a wide-ranging impact on the capacity local roads and on road safety in the area. It would clearly be impractical and unjustifiable to widen any of these thoroughfares. To do so would be contrary to the County Council's Local Transport Plan (LTP4), and its policy to protect the character of local roads.

### **Matter 3 - Sustainability (Questions 99 and 100)**

16. The promoters of the site have declared that it is highly sustainable, mainly because of its proximity to Brookmans Park railway station and the local centre. In its Regulation 19 submissions, the Society referred to a study (August 2015) by the Royal Town Planning Institute "Building in the Green Belt? A Report into Commuting Patterns in the Metropolitan Green Belt." Based on a study of five medium-sized towns, the report found that only 7.4% of commuters actually travelled into Central London to work. Given the location of the development, there would be a high level of car dependence, with the main sources of local employment being in Hatfield, Potters Bar, or further afield. The sustainability appraisal fails to pick up on that point. The social and economic elements of sustainability need to be balanced against the environmental factors. As outlined below, these far outweigh the other considerations.

### **Matter 4 – Green Belt (Questions 101 – 112)**

17. In its previous submissions, the Society has noted that the Council, in the consideration in 2012 of the options for development, had rejected the allocation of the site on Green Belt grounds. As a result, the Society expressed its disappointment and astonishment when the site was included in the Draft Local Plan 2016.

18. The Inspector has referred to Stage 3 Green Belt Review in which the site was part of assessment parcel (P65). The overall harm assessment of the parcel was "high", although the site itself was identified as sub parcel P65a, with a harm rating of "moderate-high". In these circumstances, it was surprising that the site was not identified as an area of "most essential" Green Belt. The Stage 3 Green Belt Review, however, was followed by the Green Gaps Assessment which considered that the site was located in the important strategic gap between Hatfield and Potters Bar. The report also assessed the gap between Welham Green and Brookmans Park, and recommended that this should be included in the Local Plan as a Green Gap Policy Area.

19. Following the consideration of the updated evidence base, the Council Cabinet Panel recommended in January 2020 that the site HS22 allocation should be removed from the Draft Local Plan on Green Belt and landscape grounds. This has been included in the recent consultation on site allocations, the results of which will be considered by the Borough Council in May 2020.

20. In its comments on the recent consultation, the Society has fully welcomed the Panel recommendation and hopes that the Borough Council will approve it as part of the Mani Modifications to the Local Plan. If so, the Society will support the Council in making its case to the Inspector.
21. In response to the Inspector's questions, the Society is firmly of the view that the assessment of high harm is a sound interpretation of the contribution that the entire site makes to the Green Belt. Its development would be contrary to the purposes of the Green Belt in the degree to which it would encroach on the open countryside (see paragraphs 7 – 9 above). The allocation is neither justified, nor effective, nor is it consistent with policy in the National Planning Policy Framework (NPPF). Given the characteristics of the site and its location, there are no exceptional circumstances which would justify its release from the Green Belt.
22. The Green Gap Study has emphasised the strategic contribution of the site (together with the adjacent site BrP5) in maintaining the gap between the towns of Hatfield and Potters Bar. More locally, it is also important in protecting the gap between Brookmans Park and Welham Green. The visual perception of the gap between the villages is pronounced to the west of the railway line. In its submissions, the Society has also referred to the landscape significance of the gap between Brookmans Park and the hamlet of Water End. The retention of all the gaps is essential in terms of the openness of the Green Belt.
23. In its Regulation 19 submissions, the Society has referred to the robustness of the East Coast main railway as a firm settlement boundary. The site promoters assert that the railway would constitute a firm boundary on the eastern edge of site HS 22. On the contrary, the line already forms a clear boundary on the western edge of Brookmans Park, preventing it from spilling over into the open countryside.
24. The promoters have also considered that Brick Kiln Wood would form a definitive western boundary to the site. The potential harm to the wood is described in paragraph 9 above. To the south, the proposed boundary, along the Ray Brook, is very open and not defensible. The northern boundary would be defined by Bradmore Lane, the character of which would be threatened by the development (see paragraph 14 above). It is clear that the current proposal is most inappropriate as a Green Belt boundary.

**Matter 5 – Implementation (Question 113)**

25. In view of the extensive roadworks which would be necessary to secure the development of the site, it is unlikely that the full number of dwellings could be delivered within the plan period.

**Policy SADM 31, Site HS21 (BrP13), Land west of Golf Club Road**

**Policy SADM 31, Site HS23, (BrP14), Land east of Golf Club Road**

**(Questions 115 -122)**

26. The Society has commented on these sites at the Regulation 19 stage. Both are within the Green Belt. Although only 14 dwellings are proposed at site HS21, it would be accessed from a very narrow road. The road is busy and provides road access to the Golf Club and a number of residences. It is also used by many pedestrians, including pupils at the nearby Chancellors School.

27. Site HS23 would be accessed from George's Wood Road. Development of the site would threaten the integrity of the adjacent designated wildlife site (WS 165).

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12<sup>th</sup> April 2020