

WELWYN HATFIELD LOCAL PLAN EXAMINATION

Statement by DLA Town Planning on behalf of Brookmans Park Golf Club Representor ID - 1031262

Southern settlements – Brookmans Park Site HS21 (BrP13) – Land west of Golf Club Road, Brookmans Park Inspector's questions 115 - 122

Introduction

1. This statement is submitted on behalf of Brookmans Park Golf Club. The Golf Club owns land known as The Paddock on the west side of Golf Club Road in Brookmans Park. The Paddock is proposed to be removed from the Green Belt in the submitted draft Local Plan and allocated for housing. The Golf Club support this allocation.
2. This statement provides a response to the Inspector's questions numbered 115 to 122, which relate to issues of highway safety, trees, ecology and the Green Belt. To support this response, detailed technical information is appended to this statement in the form of a Transport Statement, a Tree Constraints Report and Plan, a Preliminary Ecological Appraisal and Reptile Survey.

Highway safety

3. The Inspector asks:
115) Would the development of either or both of these sites result in an unacceptable impact on highway safety?
116) If so could this be mitigated through achievable highway improvements?
4. The Golf Club instructed Milestone Transport Planning in 2014 to consider the proposed access arrangements to this site and produce a Transport Statement (see Appendix 1). Detailed discussions then took place with the relevant officer at Hertfordshire Highways. These discussions led to the County Council withdrawing their previous objection to the site in 2015 and enabled the Borough Council to propose the site for allocation in the submission version in 2016.
5. Given the particular circumstances of the access along Golf Club Road, the County Council considers that the overall number of vehicle movements needs to be limited. However, as is set out clearly by the Council in the 2016 HELAA, the County Council considers that 14 dwellings on site HS21, together with 10 dwellings on the adjoining HS22 site, is an appropriate scale of development:

“The highways authority has confirmed that 14 dwellings on BrP13 would be the upper limit for this site (when considered alongside proposals for BrP14), subject to a degree of necessary highway mitigation measures on Golf Club Road, which could be secured at the planning application stage, and subject to overall movements in peak hours not exceeding the limits indicated above.”

6. As stated above, the precise nature of the highway mitigation measures needed can be resolved at the planning application stage. The initial set of proposals set out by Milestone in 2014 included traffic calming measures to achieve a target speed of 20mph, as well as a new footway alongside Golf Club Road where it adjoins HS21. County Council officers were comfortable with these proposals in principle but further detail would be needed at the planning application stage.
7. In summary, any highway impacts arising from the development of site HS21 can be satisfactorily mitigated and this has been confirmed by the local highway authority.

Trees

8. The Inspector asks:

117) Is the development of these sites compatible with the need to protect trees on the sites.
9. None of the trees on the site are subject to a Tree Preservation Order (TPO). The site does not lie within a Conservation Area that would afford protection to the trees.
10. Table 15 accompanying Policy SADM31 provides “site-specific considerations” for each proposed allocation and for site HS21, Table 15 states “Retain and protect trees and woodland”. In our representations on the pre-submission draft plan, we explained that this requirement did not reflect the quality of the trees on site and was not appropriate. Alternative policy wording was set out as follows: “Produce landscaping plan which identifies specific valuable trees to be retained and new planting where appropriate” and we maintain that this would be a more appropriate policy response for the site.
11. This is confirmed by the Tree Constraints Report and Plan produced by Andrew Belson, Arboricultural Consultant in 2016 (see Appendix 2). The report found only one category A tree and this lies outside the proposed development area. This tree was part of a group to the north of the developable area that were considered “sacrosanct” and should be retained. There was also a several trees in the south west corner of the site that were considered to be high value trees and should be retained. Other trees (e.g. sycamore 2466) were considered “not worthy of retention” or infected (Sycamore 2464). There was also considered to be scope to remove some trees to the north of the paddock without compromising the overall group.

12. With this evidence (which post-dated the pre-submission draft Local Plan so was not available to the Council) as context, the requirement to “Retain and protect trees and woodland” on the site seems inappropriately restrictive and does not reflect the quality or value of the trees. A more nuanced approach is necessary.
13. Our comments on the trees on site should also be read alongside the more general comments about the way the capacity of sites is expressed. It should be described as “indicative development capacity” rather than a firm limit or requirement. It is only at the planning application stage that the development capacity is firmly established. An estimate is needed for overall housing supply calculations but the estimate should be treated with caution and numbers may increase or decrease at subsequent planning stages.

Ecology

14. The Inspector asks:

118) Is there any protected wildlife that could be affected by the proposals?

119) If so how would it be protected?

15. The site is not an allocated wildlife site, either at national or county level, and there are no records of protected species on the site or in the immediate surroundings.
16. By way of context for the site, the Golf Club retains the Sports Turf Research Institute to prepare and monitor an ongoing Ecology management plan for its 205-acre site and has been recognized in the annual Golf Environment Awards.
17. The Golf Club instructed Cherryfield Ecology to undertake a Preliminary Ecological Appraisal in 2016 (see Appendix 3). The site contains a mixed woodland block and an improved grassland field (the paddock). The survey found the following:
- Bats – five trees on the site were found to have moderate potential for roosting bats. If these trees were to remain in situ, no further survey work would be needed.
 - Reptiles – as the site is suitable for reptile use, a full reptile survey was recommended.
 - Breeding birds – although no ‘in-use’ nests were found, the site has the potential to support breeding birds. Any vegetation removal should therefore occur outside the nesting season (March to August).
18. Following the Appraisal, a Reptile Survey (see Appendix 4) was carried out during 2017 with 8 separate visits to the site by an ecologist. No reptiles were found on site during these inspections and the survey therefore concluded that it is highly likely that reptiles are not present.

19. Further survey work would be needed to support a planning application in due course but at this stage there is no reason not to allocate the site on ecology grounds.

Green Belt

20. The Inspector asks:
- 120) *Is either site within the Green Belt?*
 - 121) *Would the development of HS21 result in ribbon development/urban sprawl?*
 - 122) *If so what exceptional circumstances exist to justify their removal from the Green Belt*
21. Site HS21 is currently in the Green Belt but adjoins the built-up area of Brookmans Park.
22. The development of HS21 is not considered to represent ribbon development or urban sprawl. The paddock is located between the golf course and existing housing and is contained by mature woodland on the western and northern sides. To the north of the site is existing development in the form of 6 dwellings, the Golf Club and clubhouse, as well as Chancellor's School to the north east.
23. The Council's Site Selection Background Paper (2019) notes that the site is within the Green Belt and would have some impact but goes on to observe that *"the site is bounded by an established tree belt and existing road and development could ensure that boundaries are achieved that minimize any potential impacts"*. This Paper goes on to note the findings of the Stage 3 Green Belt Review (*"moderate-high"* harm to the Green Belt) but concludes that the site *"is a small parcel of land, with potential for impact to be minimized and on this basis the positives weigh in favour of the site"*.
24. The exceptional circumstances for release of site HS21 are similar to those for other proposed allocations and as has been set out by the Council. In summary, there is a substantial need for new homes in the borough, far more than can be accommodated outside the Green Belt. The housing need is longstanding and acute. Discussions have taken place with neighbouring authorities and there is no reasonable prospect of Welwyn Hatfield's housing need being accommodated elsewhere.
25. The Council's Site Selection Background Paper concludes that site BrP13 (together with BrP14) would have *"minimal impact on the Green Belt"* (para 18.10). The contained nature of the site means that the benefits of providing housing on this site substantially outweigh any harm. Exceptional circumstances are considered to exist to release site HS21 from the Green Belt.

Appendices

Appendix 1 – Transport Statement (Milestone Transport Planning, 2014)

Appendix 2 – Tree Constraints Report and Plan (Andrew Belson, 2016)

Appendix 3 – Preliminary Ecological Appraisal (Cherryfield Ecology, 2016)

Appendix 4 – Reptile Survey (Cherryfield Ecology, 2017)