

# **Examination of the Welwyn Hatfield Local Plan**

## **Council's Statement - Stage 9 Hearing session**

**Further sites, for housing development, submitted  
to the Examination by the Council in November 2020**

**Settlement: Brookmans Park**

**Policy Number: N/A**

**Site References: BrP1**

**Matter number: 13**

**Issues: Overall development, Green Belt harm,  
listed buildings, sustainable location, trees,  
sand and gravel**

**Question Numbers: 65 - 69**



## Brookmans Park

### Matter 13 – Site BrP1, Bell Lane

The Settlement Strategy classifies Brookman's Park as a large excluded village. These locations are to be secondary foci for limited amounts of new development where this is compatible with the scale and character of the village and the maintenance of Green Belt boundaries. Development should be supported by appropriate infrastructure and the need to travel minimized. The proximity and frequency of public transport, including the location of railway stations are also important considerations? In the context of the amount of housing already promoted or approved for development during the plan period, is there scope for further development without the overall amount of housing proposed at Brookman's Park becoming disproportionate?

#### Welwyn Hatfield Response:

- a) The settlement hierarchy taken from policy SP3 is summarised in the following table (excluding the new village of Symondshyde):

Settlement Hierarchy	Settlements
Main Town	Welwyn Garden City
Town	Hatfield
Large Excluded Villages	Welwyn, Welham Green, Brookmans Park, Cuffley
Small Excluded Villages	Woolmer Green, Oaklands and Mardley Heath, Digswell, Little Heath
Green Belt Villages	Lemsford, Essendon, Newgate Street, Northaw
Small Green Belt Villages	Various

- b) Brookmans Park has an excellent village centre (41 units in former A use classes or similar town centre uses including a library), a mainline railway station and good employment opportunities near to the village. As a result it is in the third tier of settlements, below only Welwyn Garden City and Hatfield. Accordingly it is an appropriate location for development at a lower level than Hatfield, but more than the smaller excluded villages such as Digswell and Oaklands and Mardley Heath with their much narrow range of services and facilities. This general approach is of course subject to settlement character and other constraints and Green Belt harm. Development around Brookmans Park is generally associated with moderate-high and high harm to the Green Belt.
- c) As a starting point for analysis, Brookmans Park contains about 3% of the Borough's

households (2011 Census). Given its location in the hierarchy, development distribution could be proportionally weighted towards the settlement compared with locations lower down the hierarchy. Completions, commitments plus allocations supported by the Council total 213 dwellings, or about 1.8% of the total capacity within the local plan now proposed. This can be considered on the low side for its status in the hierarchy. However the Council considers that this is justified by minimising Green Belt harm as far as possible by locating sites in other sustainable settlements with lower Green Belt harm ratings.

- d) Primary School provision is a potential constraint on development in Brookmans Park as a whole. However this is difficult to consider or plan for while the overall provision of homes is uncertain. This is further complicated by the need for primary school provision in Welham Green, since the two villages are sufficiently close to be considered together in this respect. Further information can be found in the Council's statement on WeG17.

**The proposal BrP1 would develop a field with about 100 dwellings. The harm to the Green Belt's purposes is considered to be moderate.**

- 65) Is there any objective basis on which the assessed Green Belt harm could be challenged?**

**Welwyn Hatfield Response:**

- a) The site is virtually identical to the LUC study parcel P72, the only difference being the exclusion of the adjoining civil engineering/building firm immediately to the south west from the site. As the business site is intensely developed with industrial buildings, this has no implications for the assessment.
- b) The site's only contribution to Green Belt purposes (aside from purpose 5 regeneration, which is universally applied to all Green Belt in the study) is a partial one for safeguarding the countryside, purpose 3. This is because, while it contains the characteristics of open countryside, it is contained on three sides by urban development, and the fourth side has development beyond the A1000 boundary. Release of the adjoining developed land from the Green Belt alongside this allocation would not increase the harm beyond moderate. The assessment sets out clear reasons why the other Green Belt objectives would not be harmed by the site's development.
- c) The LUC report was subject to consultation and a response questioned the consistency between the approach to this site of considering its release in isolation, but considering sites together in other cases. LUC responded that the way in which different parcels are considered in terms of scenarios reflects the way in which harm varies across a parcel. However, no specific criticism of the moderate rating as it applied to this parcel was made. See **EX99E**.

- 66) Should the policy criteria contain parameters that seek to protect the setting of the adjacent listed buildings?**

**Welwyn Hatfield Response:**

- a) Historic England made the following comment during the 2020 public consultation on this site:

*“Whilst there are no designated heritage assets within this site, its western boundary lies immediately adjacent to two Grade II Listed buildings - ‘Carpenter Cottage’ and ‘56, Bell Lane’. Development of this site therefore has the potential to impact upon the setting of these designated heritage assets. We therefore strongly recommend the inclusion of a criterion requiring the preparation of a Heritage Statement / Impact Assessment which should inform the design and layout of new development at BrP1, to ensure that the significance of these buildings are not negatively affected by the proposed change in setting.”*

- b) As a result of this comment, WHBC proposed that a criteria seeking heritage assessments/impact assessments should be incorporated into the site’s site-specific considerations, and the wording is contained in the Schedule of Proposed Main Modifications. However further discussions have been held with Historic England and an improved wording for this requirement has been agreed with them as follows:

*“Development proposals for BrP1 must demonstrate that any negative impacts on the significance of the nearby heritage assets, including through development in their settings, have been avoided and if this is not possible mitigated. Specific mitigation measures will be identified through the preparation of a Heritage Impact Assessment which will inform and be submitted prior to the determination of any application for the site.”*

- c) It is not proposed to incorporate any more detailed design or layout parameters at this stage, since these are best considered and incorporated during the comprehensive treatment of the site during the planning application process. There may be a number of approaches to the protection of their character and it would not be appropriate to pre-empt these at the allocation stage. The preparation of a Heritage Statement/Impact Assessment will ensure that full information on this matter is before the site promoters and planning authority when planning applications are prepared and considered and special regard can then be had to the buildings’ conservation.
- d) The Council has reflected the need to mitigate the impact on the Listed Buildings in the site capacity of 104 dwellings, by assuming a gross density of 20 dph compared with the standard 30 dph for a site of this area (5.23 ha).

**67) In the context of the site’s proximity to retail and community facilities and frequent public transport, is this a sustainable location for housing development?**

**Welwyn Hatfield Response:**

- a) The site is considered to be reasonably sustainable in this respect. It is within cycling distance of the village centre and railway station (about 1.2 miles). The primary school is a little further (1.4 miles) whereas Chancellors secondary school is within walking distance (0.3 miles). These facilities are supplemented by a number of local services much closer to the site including a small shop in a petrol filling station, a food court in the nursery, a public house and a restaurant.
- b) The nearest bus stops are within 400m of the site and access Brookmans Park village centre and the town centres of Hatfield and Welwyn Garden City.
- c) The promoter offers to provide a dedicated cycle track to the north of the golf course

linking to Bradmore Way though their promoted site BrP12a. This would have the key benefit of a dedicated off-road cycle route which avoids the need to cycle along George's Wood Road and most of Brookmans Avenue, and reducing slightly the distance to the primary school to just over a mile.

**68) Should all of the trees on the site be retained and their retention referred to in the policy criteria?**

- a) There are no Tree Preservation Orders on the site.
- b) In accordance with the proposed "site specific considerations" contained in a Proposed Main Modification drafted by the Council the hedgerow and trees along the A1000 frontage are to be retained and enhanced to a substantial width. This would entail retention of both the roadside hedge and the three individual trees close to that boundary within the site. This specific requirement is justified by the need to create a robust Green Belt boundary and noise attenuation zone along the road frontage.
- c) The site's other boundaries mainly consist of hedgerows containing a number of mature trees. Particularly important examples include a group of trees close to a pond in the north western corner of the site and four roadside trees along Bell Lane near its southern junction with the A1000. It would be consistent with the design policies of the local plan for these to be retained, protected and managed as part of the development of the site.
- d) The hedgerows are not of equal quality along their whole length, providing the opportunity to access the site from Bell Lane without any significant impact on trees or the integrity of the hedgerow. An illustrative layout prepared by the site promoter indicated access at the western edge of the site which would be consistent with this aim.
- e) The two individual large trees towards the south western part of the site are attractive specimens and their retention within the site layout, perhaps within green infrastructure areas, would be beneficial in ecological and character terms.
- f) However, in the absence of a formal tree survey it would be premature to require 100% retention, given the possibility of disease within one or more of the individual trees and the need to create a quality layout and design. Accordingly, should the Inspector consider a reference appropriate, the following wording is recommended as an additional bullet point for the site
  - "Tree survey required at planning applications stage. Retention and protection of trees and hedgerows on site if feasible, compensatory planting if trees are lost."

**69) Should the policy criteria make reference to a requirement for the working of any suitable sand and gravel reserves found on the site?**

- a) The site adjoins existing residential development on two sides, and is relatively small in size. It does not therefore appear to be appropriate to require full extraction of sand and gravel which would have unfortunate impacts on residential amenity. This would also act to delay the delivery of new homes and therefore the extent to which the site can contribute to the five year housing supply.
- b) For these reasons, the Council would not support a requirement that sand and gravel is extracted in advance of development. Should there be an opportunity to use on-

site material in the construction then that would appear to be more appropriate. This would accord with policy SP10 which seeks the reuse of excavated soil and hardcore from within the site. The Council would have no objection to a reference to the opportunistic use of sand and gravel during development. Policy SP18 contains a suitably worded criterion which could be adapted as follows:

- “Demonstrate that the opportunistic use of some minerals on-site within the site itself has been fully considered, subject to it not prejudicing the early delivery of housing.”