

Technical Note for updated LUC Green Gap Assessment

**THE BROOKMANS ESTATE – BROOKMANS PARK**  
Aurora Properties Ltd

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## APPENDICES:

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Figure 2: Strategic Gap

Figure 3: Green Gap between Hatfield and Potters Bar

Figure 4: Landscape and Biodiversity Opportunities

Figure 5: Brookmans Park Aerial View

Appendix B: Extract from WHBC Housing Sites Selection Background Paper 2016

Appendix H of WHBC Housing Sites Selection Background Paper 2016

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# 1 TECHNICAL NOTE: REVIEW OF LUC GREEN GAP ASSESSMENT AUGUST 2019

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## 1.1 Introduction

1.1.1 The Land Use Consultants (LUC) Green Gap Assessment August 2019 (GG Assessment) applies to the medium sized towns and villages referred to within the Welwyn Hatfield Local Plan para 4.2 as well as ‘washed over’ villages. The study also considers areas between the settlements within the Borough and those located outside of the Borough boundary.

1.1.2 Within the report, the settlement of Brookmans Park is referenced as a Relevant Settlement. It is also referred to as a Specified Settlement.

1.1.3 The GG Assessment states that it aims to:

*“...provide evidence to inform the location of site allocations (that minimise impacts on settlement separation), as well as to inform a potential future policy on gaps to maintain the separation of settlements.*

*To inform the latter, this study identifies potential ‘gap policy areas’ in which impact of development on settlement separation should be a consideration.*

*These policy areas may be refined once sites have been allocated as part of the emerging Local Plan.”<sup>1</sup>*

1.1.4 The GG Assessment also:

*“... identifies areas that have higher landscape sensitivity, important biodiversity/ecological sites or linkages and other environmental designations that are likely to reinforce the case for keeping land open.”<sup>2</sup>*

1.1.5 The GG Assessment suggests policy wording for Green Gaps:

*“In order to maintain the separate identities of settlements and prevent their coalescence the generally open and undeveloped nature of the following areas identified in the Policies Map will be protected...”<sup>3</sup>*

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<sup>1</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P2.

<sup>2</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P2.

<sup>3</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P135.

- 1.1.6 It is considered that the proposed purpose of a Green Gap overlaps with the purposes of the Green Belt to the extent that it is an unnecessary duplication, the NPPF describes the aim of Green Belt policy is to:
- “prevent urban sprawl by keeping land permanently open.”*<sup>4</sup>
- 1.1.7 No other authority that we (or LUC) are aware of have taken this approach. This is a point confirmed by LUC within the GG Assessment at A2.9, where they were unable to identify any examples of where their reviewed Green Gaps overlapped with a Green Belt designation.
- 1.1.8 The NPPF requires that Green Belt boundaries can only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.
- 1.1.9 The NPPF states that any development in the Green Belt is considered inappropriate and harmful. Planning permission should not be granted unless Very Special Circumstances clearly outweigh all other considerations. The proposed WHBC Green Gap policy will add nothing to the existing protection already offered by national Green Belt purposes and the protection in the NPPF against inappropriate development in the Green Belt.
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<sup>4</sup> NPPF, para 133.

## 1.2 Methodology

1.2.1 The GG Assessment first sets about identifying candidate areas for assessment. This included:

- The areas between the specified settlements in the adopted local plan were all included.
- Areas between the specified settlements and the nearest settlements outside the Borough boundary,
- Areas between specified settlements and washed over villages that have potential for inseting (as identified in the Green Belt study),
- and between the proposed new settlement of Symondshyde and nearest specified settlements.

1.2.2 This was used to identify a list of 'Gaps' that fitted with the above criteria. The areas of land surrounding the settlement of Brookmans Park were found to meet the following criteria:

### 1.2.3 Areas between specified settlements:

- Between Welham Green and Brookmans Park;
- Between Brookmans Park and Little Heath (NB this is covered by the areas between Brookmans Park and Swanley Bar, and between Swanley Bar and Little Heath below).

### 1.2.4 Areas between specified settlements and settlements outside the Borough boundary:

- N/A. It is important to note that LUC have not assessed the gap between Hatfield and Potters Bar (two First Tier settlements).

### 1.2.5 Areas between specified settlements and potential inset villages:

- Between Bell Bar and Brookmans Park;
- Between Swanley Bar and Brookmans Park;

### 1.2.6 Potential gaps between the new settlement of Symondshyde and other settlements:

- N/A

1.2.7 Of these, this review is focused on those areas that are relevant to the parcel of land to the north west of Brookmans Park, BrP12. This results in the report being concerned with only one area:

Areas between specified settlements:

- Between Welham Green and Brookmans Park.

1.2.8 The LUC GG Assessment states at para.2.7 that there is no prescribed method for assessing Green Gaps, and that the method for assessment drew on the author's own research and the brief provided by WHBC as well as comments made by the Inspector at and following the Welwyn Hatfield Local Plan examination sessions in 2018.

1.2.9 The following stages were undertaken for each candidate area:

- Identifying Existing Settlement Pattern and Identity
  - Recording Gap Size, Character and Strength
  - Reviewing Landscape sensitivity
  - Analysing Gap Value and Opportunities: Ecological and Cultural Heritage Designations and Habitat Networks
  - Analysing Gap Value and Opportunities: Recreation
  - Analysis of Pressure on the Gap
  - Field Verification
  - Summary and Recommendations for each area.
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### 1.3 Settlement Gap Assessments: Area between Welham Green and Brookmans Park

1.3.1 The Settlement Gap Assessment for the area of land between Welham Green and Brookmans Park follows the stages set out above and comes to the following summary and recommendations:

*“There is a physical gap in this location that is currently robust (in that it effectively provides a sense of separation between the two settlements) but could be vulnerable to erosion as demonstrated by the promoted sites. It is therefore recommended that a gap policy area is identified in this area to protect the settlement pattern and prevent the future coalescence of these two settlements.*

*The case for keeping this land open is strengthened by the moderate-high landscape sensitivity west of the railway line, the presence of ecologically valuable sites (a SSSI and Local Wildlife Sites with associated priority habitat deciduous woodland and ancient woodland) and the recreational value provided by a network of footpaths.”<sup>5</sup>*

1.3.2 The GG Assessment recommends that the area illustrated on Map 2<sup>6</sup> could form part of a ‘gap policy area’, within which the aims should be to:

- *“Avoid the coalescence of Welham Green and Brookmans Park, and ensure each retains its own separate identity;*
- *Ensure that there is an experience of travelling through rural countryside after leaving one settlement and before entering the next, when travelling along Station Road or on the railway;*
- *Ensure development does not mask the valley feature that divides the settlements – this should remain a strong feature of the gap;*
- *Ensure the area within the gap continues to provide a rural setting to both settlements;*
- *Ensure there is no inter-visibility between one settlement edge and the other (making sure to consider the winter situation without leaves on trees) – topography and vegetation can provide a screening function;*
- *Protect existing features of ecological interest including reedbeds and willow carr (in the valley) and hedgerows and deciduous woodland in the farmland, and seek opportunities to extend and link these habitats;*

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<sup>5</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P38.

<sup>6</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P39.

- *Maintain public access to and across the area, seeking opportunities for further connections where possible.”*<sup>7</sup>

1.3.3

Table 4-1 gives a summary of gaps recommended to be taken forward as ‘Gap Policy Areas’. The area of land between Welham Green and Brookmans Park is described as:

*“There is a physical gap in this location that could be vulnerable to erosion therefore it is recommended that a gap policy area is identified in this area to protect the settlement pattern and prevent the future coalescence of these two settlements. The case for keeping this land open is strengthened by the moderate - high landscape sensitivity west of the railway line, the presence of ecologically valuable sites (a SSSI and Local Wildlife Sites with associated priority habitat deciduous woodland and ancient woodland) and the recreational value provided by a network of footpaths.”*<sup>8</sup>

1.3.4

The proposed Green Gap is shown on Figure 4.1 of the GG Assessment: Proposed gap policy areas.

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<sup>7</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P38.

<sup>8</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P118.

## 1.4 Review of Settlement Gap Assessment

Avoid the coalescence of Welham Green and Brookmans Park, and ensure each retains its own separate identity:

- 1.4.1 LLA Figure 2 demonstrates that development of BrP12 would not result in the physical distance of built form within the gap between Welham Green and Brookmans Park being reduced.
- 1.4.2 The elevated East Coast Main Line (ECML) railway is a strong and permanent barrier between the two villages that divides the proposed Green Gap into two distinct areas. This is recognised by LUC within the GG Assessment:
- “Welham Green lies to the west of the railway line and Brookmans Park to the east, with the railway line providing a physical barrier between the two.”<sup>9</sup>*
- 1.4.3 As identified earlier at 1.3.1, LUC confirm that the land to the west of the railway line is of higher sensitivity than that of the land to the east. BrP12 is located to the east of the railway line. The GG Assessment further acknowledges that it is the land to the west of the railway line, and not the land to the east that is important in maintaining the separation of the two settlements and not the land at BrP12:
- “The area between Station Road and the railway line is considered as moderate-high due to its role as a rural setting for the two settlements and maintain their separation.”<sup>10</sup>*
- 1.4.4 Peplins Wood (ancient woodland) is also a very strong, mature and dense barrier between the two villages. It is considered that both the railway line, and Peplins Wood form permanent features within the landscape that limit any potential extent of the overall ability of these two settlements to coalesce either physically or perceptually. Development of BrP12 would not result in the physical distance of built form within the gap between Welham Green and Brookmans Park being reduced. LLA Figure 1 shows the area of the Green Gap adjusted to take account of these permanent features. It is considered that the proposed amendment to the boundary of the Green Gap policy area along the eastern edge of the railway line would not affect the overall integrity of the Green Gap or result in any “significant adverse impact” on the objectives of the Green Gap.

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<sup>9</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P36.

<sup>10</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P37.

Ensure that there is an experience of travelling through rural countryside after leaving one settlement and before entering the next, when travelling along Station Road or on the railway:

- 1.4.5 The southern tip of Peplins Wood extends along the western extent of BrP12 at a depth of approximately 75m. This established woodland limits the extent of views east from Station Road towards BrP12, which when combined with the elevated embankment of the railway and the layering of vegetation to the west of the railway line results in the fact that development of BrP12 would not be apparent either visually or perceptually from Station Road.
- 1.4.6 Users of the railway line occupy a slightly elevated position, but not a greater height than the trees immediately alongside within the tree belt and within Peplins Wood.
- 1.4.7 As such, it is considered that the tree belt is sufficient to screen notable views of any development within BrP12 to the extent that the experience of travelling through a rural environment would not be compromised.

Ensure development does not mask the valley feature that divides the settlements – this should remain a strong feature of the gap:

- 1.4.8 The valley feature that separates these two settlements is located to the north of Peplins Wood and crosses the countryside east to west. Skimpans Bridge, Farm and Swallow Holes are all contained within this shallow valley to the west of the railway line, which Station Road cuts across as it heads north west from Brookmans Park to the southern extents of Welham Green. It is from the section of road to the west of the railway line that there is an appreciation of the valley landform. As identified, the southern tip of Peplins Wood extends along the western extent of BrP12 at a depth of approximately 75m between Brp12 and the East Coast Mainline railway. This established woodland limits the extent of views east from Station Road towards BrP12, which when combined with the layering of vegetation to the west of the railway line results in the fact that development of BrP12 would not be apparent either visually or perceptually from Station Road, maintaining the existing appreciation of the valley landform that currently exists from within the countryside to the west of the railway line.

Ensure the area within the gap continues to provide a rural setting to both settlements:

- 1.4.9 The majority of, and the more sensitive areas of, the proposed Green Gap policy area is to the west of the railway line. Given the contained nature of BrP12 there is limited appreciation of this from within the remainder of the GG policy area. As such it is considered that development of BrP12 would have no appreciable effect on the rural characteristics of the wider parcel.
- 1.4.10 Peplins Wood would limit the northern spread of development within BrP12 whilst forming a strong and permanent landscape buffer to the north of the settlement that would provide a strong rural setting to the settlement of Brookmans Park.

Opportunities to provide additional public access to the countryside to the north of Brookmans Park Golf Club (the land to the east of BrP12) as well as into Peplins Wood would also help reinforce the semi-rural character of this area.

Ensure there is no inter-visibility between one settlement edge and the other (making sure to consider the winter situation without leaves on trees) – topography and vegetation can provide a screening function;

- 1.4.11 The elevated East Coast Main Line (ECML) railway is a strong and permanent barrier between the two villages. Peplins Wood (ancient woodland) is also a very strong, mature and dense barrier between the two villages. It is considered that both of these form permanent features within the landscape that restrict any inter-visibility between the two settlements (all year round). As development of BrP12 would not result in the removal of either feature, there should be no reason for this position to change. As identified on LLA Figure 2 development of BrP12 would not result in the physical distance of built form within the gap between Welham Green and Brookmans Park being reduced.

Protect existing features of ecological interest including reedbeds and willow carr (in the valley) and hedgerows and deciduous woodland in the farmland, and seek opportunities to extend and link these habitats;

- 1.4.12 Development of BrP12 would not result in the loss of any *existing features of ecological interest*. In fact, ecological improvements are proposed with the cooperation of the Herts and Middlesex Wildlife Trust.

Maintain public access to and across the area, seeking opportunities for further connections where possible.

- 1.4.13 Paragraph 138 of the NPPF requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. It endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including new or enhanced green infrastructure, habitats, walking and cycle routes, open spaces, woodland planting and landscaping.

- 1.4.14 The proposed gap between Welham Green and Brookmans Park does have some existing degree of recreational value provided by a network of footpaths between Bell Bar and Welham Green. However, a number of new opportunities for public accessibility could be provided across the countryside to the north of Brookmans Park by the creation of new footpaths and cycle ways provided as a result of the development of BrP12 that meet the requirements of NPPF Paragraph 138.

- 1.4.15 As demonstrated on LLA Figure 4 Landscape and Biodiversity Opportunities, this could include, new public rights of way, cycle paths, open access and amenity green space as well as opportunities for recreation and access to the countryside. LLA Figure 4 also demonstrates possible connections to the wider PRoW network

including links from Brookmans Park to the Footpath network to the north of Peplins Wood, linking Brookmans Park with Bell Bar and Welham Green.

- 1.4.16 The landowner of BrP12 is a major landowner in Brookmans park, and one of only a few landowners in the borough which can offer a wide range of compensatory benefits and improvements which can all be delivered.
- 1.4.17 LUC has not undertaken a review of the gap between Hatfield and Potters Bar (two First Tier settlements). Potters Bar is located within Hertsmere, however LUC say at 2.11 that they have included land outside of Welwyn Hatfield borough, however there is no evidence that the gap between these two large settlements has been considered. The gap between these two First Tier settlements is clearly demonstrated on LLA Figure 3 and can be appreciated as the tract of land to the west of the East Coast Main Line Railway (ECML) and the east of the A1(M). The ECML and the A1(M) act as strong permanent boundaries within the landscape. Pressure from development within this gap has included site allocations at HS11 and HS22, as well as solar farms and development at the Royal Veterinary College. These have reduced the open nature of the gap between these two settlements further increasing sensitivity to further development. Any additional development to the west of the ECML would further erode this gap, as well as undoubtedly helping lead to the coalescence of these two settlements.
- 1.4.18 The presently undeveloped land between between Hatfield and Potters Bar, to the west of the East Coast Mainline Railway requires careful consideration and protection from unrestricted sprawl and to prevent towns from merging (two national Green Belt purpose) which LUC fail to address.
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## 1.5 Review of Green Gap Assessment and Green Belt Assessment Findings

1.5.1 The WHBC site selection report from 2016, found BrP12 suitable for allocation. However, it was not allocated because of a perceived lack of primary school capacity in Brookmans Park. This has since found to have been unsound.

1.5.2 Table 33 on page 42 identifies sites around Brookmans park that are within the Green Belt and are considered suitable for allocation.

1.5.3 It is reproduced here for reference and included as Appendix B:

Site Ref	Site name	Indicative capacity
BrP4	Land west of Brookmans Park	300
<b>BrP12</b>	<b>Peplins Wood</b>	<b>110</b>
BrP13	West of Golf Course Road	14
BrP14	East of Golf Course Road	10
Total		434

1.5.4 Appendix H from Hou20a (part of Hou20) of the WHBC site selection report from 2016 (included at Appendix B) includes the assessment of site BrP12. Appendix H effectively deals with Green Belt issues, and in many cases, these are similar to those identified when addressing the Green Gap. As such it is unclear as to why is BrP12 was found appropriate for removal from the Green Belt but included within a local Green Gap.

1.5.5 For example, BrP12 was found “suitable for allocation” taking into consideration the gap between Brookmans Park and Welham Green. Appendix H of the Council’s Housing Site Selection Paper (June 2016 – HOU20) states:

*“The proposed new Green Belt boundaries consisting of the extensive woodland, established tree belt/hedgerow and ordinary watercourse would be no weaker than the existing boundaries and could be clearly defined and defensible boundaries. A fragile gap would be shortened although only to a relatively small extent. The site is also contained and largely screened by the ancient woodland.”*

1.5.6 The Council’s description of the site’s suitability and containment in Green Belt and the gap between Welham Green and Brookmans Park fails to mention the elevated East Coast Mainline railway to the west of the site, which provides a strong and permanent Green Belt boundary and would reduce both the visual and perceptive closure of the gap between the settlements. Indeed, as a matter of fact, the allocation of BrP12 would not reduce the existing gap between Brookmans Park and Welham Green as shown on LLA Figure 2.

## 1.6 Conclusions

- 1.6.1 Development of BrP12 would not result in the physical distance of built form within the gap between Welham Green and Brookmans Park being reduced.
- 1.6.2 The boundary of the Green Gap between Welham Green and Brookmans Park has been drawn by LUC to include land to the east of the railway line, without any clear purpose or representation of the features of this landscape. The elevated ECML is a strong and permanent barrier between the two villages and Peplins Wood is also a very strong, mature and dense barrier (ancient woodland) between the two villages. This is something that is identified within the GG Assessment with the acknowledgement that the railway line provides a physical barrier between the two settlements.
- 1.6.3 Appendix 2, para A2.10 identifies that the boundaries of the gap policy areas are drawn broadly, and do not necessarily mean that any development within the green gap would adversely affect separation, but only that separation may be a consideration. As such it may be possible to develop within the green gaps in locations that would not result in any appreciation of any closing of the gap, physically or perceived, and still meet the aspirations of the gap policy.
- 1.6.4 This is confirmed at A2.13, which suggests proposed policy wording permitting development which does not have a significant adverse effect on the physical or perceived separation of settlements. Para 4.10 identifies a number of the ‘most vulnerable gaps’. The GG Assessment does not state that BrP12 falls within one of these.
- 1.6.5 The NPPF describes the aim of Green Belt policy is to:  
*“prevent urban sprawl by keeping land permanently open.”*<sup>11</sup>
- 1.6.6 The GG Assessment suggests policy wording for Green Gaps:  
*“In order to maintain the separate identities of settlements and prevent their coalescence the generally open and undeveloped nature of the following areas identified in the Policies Map will be protected...”*<sup>12</sup>
- 1.6.7 It is considered that the purpose of a Green Belt and Green Gap overlap to the extent that it is an unnecessary duplication – no other authority that we (or LUC) are aware of have taken this approach. This is a point confirmed by LUC within the GG Assessment at A2.9, where they were unable to identify any examples of where their reviewed Green Gaps overlapped with a Green Belt designation. Furthermore, there

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<sup>11</sup> NPPF, para 133.

<sup>12</sup> Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment. LUC 2019. P135.



are no policies relating to gaps between settlements in the currently adopted District Plan or the emerging Local Plan.

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