

Stage 9 Hearing Session – EX231 Statement of Common Ground between WHBC and Royal Veterinary College and Hill Residential Ltd

Representations of Howard Dawson FRICS

BrP4 – HS22 – Brookmans Park

1. My name is Howard Dawson, I am a long-standing resident of Welham Green and a Regulation 19 party to the Welwyn Hatfield Local Plan Examination.
2. The Statement of Common Ground (SOCG) at EX231 does not appear to contain any common ground. The Council has decided to delete BrP4 – HS22 from its Local Plan.
3. In order for any land to be released from the Green Belt, it is necessary for the Council to demonstrate “exceptional circumstances”. The Council confirms in the SOCG: *“WHBC no longer support the allocation of this [BrP4 - HS22] site, or the potential extension to it which is described below and do not consider there to be exceptional circumstances for its green belt release.”*
4. Whilst it is a matter for the Inspector to decide whether, or not, a main modification is appropriate to delete BrP4 – HS22 from the plan at examination, it would be perverse to create circumstances where the Borough Council is formally notifying the Inspector that the allocation of BrP4 – HS22 is not sound, but the Inspector insists that it is. That seems like the fastest road to the High Court.
5. My submission at the Stage 8 Hearing Session addressed the reasons why BrP4 – HS22 did not meet the test of exceptional circumstances (and other planning reasons). For ease of reference, I have listed those reasons again below.
6. The planning reasons why the allocation of BrP4 – HS22 is not sound are:
 - 6.1 The site is within an area of permanently open Green Belt. It is a fundamental aim of Green Belt policy to prevent sprawl and to keep land permanently open as required by paragraph 79 of NPPF 2012.
 - 6.2 The site is beyond a strong and permanent Green Belt boundary (the East Coast Mainline Railway), which should be preserved in accordance with paragraph 85 of the NPPF 2012.
 - 6.3 The allocation of BrP4 – HS22 would weaken the existing Green Belt boundary such that it would be less likely to endure beyond the Local Plan period, as required by paragraph 83 of the NPPF 2012.
 - 6.4 BrP4 – HS22 has been found by the LUC Stage 3 Green Belt study to be High Harm if released from the Green Belt. All of the land surrounding BrP4 – HS22 was found to be Very High Harm if released from the Green Belt.
 - 6.5 BrP4 – HS22 shares all the characteristics of the surrounding Very High Harm land. There is no rational explanation for why LUC found BrP4 – HS22 to be any less than Very High Harm.

- 6.6 The development of BrP4 – HS22 would cause visual and perceptual coalescence between Welham Green and Brookmans Park, along the transport corridors of Station Road and the railway.
 - 6.7 The LUC Stage 3 Green Belt study is fundamentally flawed in respect of BrP4 – HS22.
 - 6.8 There are no “exceptional circumstances”, as required by paragraph 83 of the NPPF 2012, to allocate BrP4 – HS22 which outweigh the harm to this “*essential to retain*” Green Belt.
 - 6.9 The division and segregation of BrP4 – HS22 from the existing village of Brookmans Park is not socially cohesive, thus undermining a pillar of sustainability.
 - 6.10 The development of BrP4 – HS22 for 250 or 300 new homes would cause significant harm to the small settlement of Water End.
7. The planning officers advised the Council Members on numerous occasions during the preparation of the plan that BrP4 – HS22 was not suitable for allocation. Their advice was ignored by the Member for Brookmans Park who insisted that BrP4 – HS22 should be allocated in preference to the more suitable and sustainable sites in Brookmans Park. The allocation of BrP4 – HS22 was therefore a political decision, without justification. Indeed, the only justification that the planning officers could find was that major highway and highway safety improvements would be achieved on the railway bridge to the west of Brookmans Park. The Royal Veterinary College has now withdrawn that promise.
 8. BrP4 – HS22 is unsuitable for any housing. It is not suitable for 250 dwellings and it most certainly is not suitable for 500+ dwellings.
 9. The SOCG at EX231 is simply wasting yet more time at this examination. BrP4 – HS22 should be deleted from the Local Plan but not at the expense of greater allocations in Welham Green. More suitable sites in Brookmans Park continue to be available.

Howard Dawson 
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