

**Application Reference:** 6/2022/1097/OUTLINE

**Proposed development at:** Land to the North of Bradmore Way, Bradmore Way, The Brookmans Estate, Brookmans Park

**Proposal:** Outline planning permission with all matters reserved except access, for up to 125 dwellings, a care facility for up to 60 bedrooms (Use Class C2), and a scout hut (Use Class F2)

## **NMPC: MAJOR OBJECTION**

### **1. LOCATION**

This site has not been accepted by WHBC in the emerging Local Plan nor was it included in the Draft Local Plan therefore it is inappropriate development in the Green Belt as it will affect the openness, the spatial and visual amenity of the area and would result in the loss of green space in this location.

The site has been classed as MODERATE to HIGH HARM Green Belt rating meaning its loss would be damaging.

The north boundary is indefensible and as this would link to site BrP12a (indicated on the landscaping plans by the road having no obvious end).

The position of the site will result in the loss of the environmentally valuable Green Gap (which is only 400 metres) and would exacerbate the likely coalescence of Welham Green and Brookmans Park.

The addition of 125 dwellings is an increase of 72% over the 174 dwellings in Bradmore Way and Peplins Way which is excessive for a site in a restricted location. The overall appearance, density, layout and proximity to the existing homes will be out of character with the locality and will have an adverse consequence on the nature of Brookmans Park village. This will impact the character of the village and will permanently affect the nearby residents detrimentally both during and after any construction.

The site abuts the upper north east boundary of the Watling Chase Community Forest and includes the heritage asset of Peplins Wood, an ancient woodland which will be obscured from the village by the proposed development. Whilst there are green spaces included in the design, the benefit of these and the woodland will be restricted.

### **2. ACCESS**

Access is fundamental to the application as the location of the site is a serious issue in terms of the narrowness of both Bradmore Way and Peplins Way, traffic, parking and not least the Primary School which has gates to both roads. The village centre also has very restricted road widths and one-way routes which, along with the minimal parking available, cause traffic congestion. There are 'pinch points' which cannot easily be improved or enlarged.

In view of the lack of Highways mitigation measures, the application should not be assessed just on an Outline layout of the site. The lack of this essential information should invalidate the application as it cannot be determined fairly without it.

### **3. DESIGN**

Although the application is in Outline only, the suggested overall appearance, density, layout and proximity to the village of the application site will be out of local character and will damage the village setting.

Section 130 of the National Planning Policy Framework 2021 states:

“Planning policies and decisions should ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- b) Are sympathetic to the local character and history including the surrounding built environment and landscape setting.

Policy D2 “Character and context” of the Welwyn Hatfield District Plan (2005) submit that the Council requires new residential developments to be of the highest standards and respect the quality and character of the existing neighbourhoods.

The above stipulations clearly show that the proposed development in Bradmore Way will be alien to the form of development in the vicinity. The development will have an adverse impact on the quality of the area and will not function well particularly as it is annexed to the end of an already busy road which takes a considerable and disruptive amount of traffic to and from the local primary school. Its establishment in an existing open space will spoil the biodiversity currently present.

The character of Brookmans Park village is one of a small, historical setting which has developed slowly over many years. Currently the village is supported by a few facilities which although diverse are small in scale. Whilst these facilities are sufficient for a small village’s needs, they will strain to support the increase in footfall created by such a large development.

The inclusion of a Care Home is questionable given the abundance of similar older persons facilities in the Borough and beyond.

[There are 8 care homes within a five-mile radius of Brookmans Park (Hatfield & Welwyn Garden City) and 10 assisted living complexes within a five-mile radius of Brookmans Park (Potters Bar & Hatfield)].

The existing Potterells Medical Centre does not have land on which to expand and the East & North Herts CCG response makes clear that it expects Doctors to close their lists as large-scale development increases. The E&N Herts CCG response does not address the impacts of a 60 bed Care Home and whilst they request s106 monies it is not clear that this will support infrastructure in North Mymms.

However, placing a Care Home in close proximity to a railway line when dB levels as indicated in the Acoustic Design Statement average 52dB at night – but did not mention wind direction which amplifies the intrusive noise if in the ‘wrong’ direction – seems unsatisfactory for residents who might wish to sit in the garden during the day with many trains passing and which is placed facing the railway line.

The inclusion of a Scout Hut is laudable but a sop.

It is of concern that the layout appears to have little or no front garden provision except for car parking and whilst there are two small play areas the larger green boundaries are mainly meadow which will not be usable.

The housing mix includes 2.5 storey dwellings which are ‘town house’ style and out of keeping with a rural location such as this site. The Affordable and Self Build numbers appear good. The Housing Mix paper indicates the flats will be 1 storey which is acceptable.

The Statement of Community Involvement does not address any involvement by the applicant with the community of Brookmans Park or North Mymms Parish as there has been none.

#### **4. SUSTAINABILITY**

The Application cannot be viewed in isolation as the whole Parish of North Mymms is subject currently to a number of submissions including Upper Bell Lane Farm on Bulls Lane (in the applicant’s ownership), Skimpans Farm in preparation at the southern edge of Welham Green on Bulls Lane and this site which is part of the land owned by the applicant almost entirely to the south side of Bulls Lane. The overall effect would be to subsume the villages and lose Green Belt land in a massive amount.

The Sustainability Assessment at point 4 states “The County Council has also confirmed its intention to expand Brookmans Park primary school from 1.5FE to 2FE...” however this will only exacerbate current traffic issues in and around Bradmore and Peplins.

Whilst it is a matter of opinion at point 9 that “The social, environmental and economic benefits of delivering new homes in Brookmans Park significantly outweighs any harm.” this is a tenuous assertion. Similarly, to state that Brookmans Park is the most sustainable village in the Borough is an opinion and it is clear that expansion of the village will impact and damage the area especially the loss of rural Green Belt which serves to protect and enhance the locality.

The assertion that a local Care Home will release existing housing stock within the village is again tenuous as many residents who may want to downsize are not ready to go into ‘care’ but want low rise, single storey housing. The inclusion of a Care Home cannot be justified by the very small number of BP residents who might sell their homes.

The Travel Plan (2.18) is disingenuous in as much that there is only one fairly reliable regular bus service to Brookmans Park – the others are school runs or limited once per week services.

The Railway Expert Report states that Brookmans Park station is under-utilized (Table 3-1) however this overlooks the fact that BP is not a mainline station (such as Potters Bar or Hatfield) but a local service stop and has been subject to cut backs of stopping trains on more than one occasion.

The proposals for SuDS in the Flood Risk Assessment are laudable but an open pond next to a play area is unacceptable.

It is of great concern that the Flood Risk Assessment implies that there will be discharge to Surface Water Body by the railway which could exacerbate flooding in this area.

Similarly, it is of concern that if an attenuation pond is built how it will be maintained long term or cleaned out to prevent it becoming clogged. If Foul Water is to be pumped (indicated by a pumping station on the plans) again how will this be maintained long term to prevent breakdown and subsequent flooding long after the developers have sold and left the site.

The drainage ditch to the rear of the short leg return of Peplins Way may also become clogged if the area indicated as a buffer area is not maintained.

## **5. CONCLUSION**

North Mymms Parish Council (NMPC) submitted a Major Objection to both BrP12 (125 Dwellings, 80 bed Care Home & Scout Hut, 12.2 ha) and BrP12a (87 Dwellings, 8- bed Care Home & Scout Hut, 8.4ha) in June 2019 in response to the Consultation on Sites promoted through the Call for Sites 2019 by WHBC.

NMPC maintain the Major Objection and note from the ownership record that Brp12a not only indicates extension of the site at some point but also includes an 80 bed Care Home as well as 80 dwellings.

Given the Land Ownership details the intention appears to be to sweep around the Golf Course to the proposed development at 6/2021/3538/OUTLINE.

NMPC request that consideration of the impact on Brookmans Park, a rural village, be given to the fact that other large developments are also currently being proposed, thereby multiplying the concerns as aforementioned.

This application is for inappropriate development in the Green Belt, it has not been accepted in the emerging Local Plan and the special circumstances which might outweigh any harm have not been demonstrated therefore this submission should be refused.