

WELWYN & HATFIELD LOCAL PLAN – GREEN BELT BOUNDARIES

I would like to make a representation on how Green Belt boundaries appear to have been dealt with at Brookmans Park.

I will need to refer to sites, particularly as most are in the Green Belt, as this will inevitably result in some form of alteration to the boundary.

I have to say the council's site selection performance is lacklustre having taken years to complete and including not one but two calls for additional sites causing additional unnecessary delays.

The principle change that the council now propose is to delete BrP4 from the plan and substitute BrP34 (the Brookmans Park Transmitter site) under Major Modifications.

I agree that BrP4 is unsuitable, which despite being close to the station, has a range of planning disadvantages which start with being on the wrong side of the hard Green Belt boundary and end up encroaching onto land that will almost certainly be required in the future by the Royal Veterinary College. The council themselves are on record as stating the site was unsuitable but for some reason slipped it back in at the last minute. If ever there was a site selection that weakens the Green Belt boundary provided by East Coast Main Line it is this.

BrP34 is on the Great North Road, also on the wrong side of a hard Green Belt boundary that is provided by The Great North Road, has a range of obvious planning disadvantages including being nearly two miles walk to Brookmans Park station without any bus routes. The site has numerous radio transmission masts and dishes which the NPPF guidance states that should be retained where possible. The substitution site of BrP34 is extraordinary it being even less suitable than BrP4 and has been advanced in the expectation of rejection to leave them with low numbers for the village.

Brookmans Park currently benefits from exceptionally strong defensible Green Belt boundaries on its east and west boundaries and these should be maintained and wherever possible and hopefully strengthened where site selections oblige. The adoption of a local plan gives an opportunity to further secure and strengthen these boundaries to the north and south of the village. BrP4 and BrP34 weaken the existing hard Green Belt boundaries. In both cases the Green Belt will be more vulnerable to planning applications reducing Green Belt land for future generations.

There are three sites to the south of Brookmans Park (BrP6, 9 & 10) which are approximately 700 yards from the station (well within the walking radius), have no coalescence issues due to topography, have a *less than substantial* harm rating from Historic England and are adjacent existing residential habitations. BrP6 was even designated as a suitable alternative site in the plan. There is therefore a strong sustainability case for these sites but what is most striking is that they would be easy to encase in new hard and defensible Green Belt boundaries formed by East Coast Mainline, Hawkshead Lane, Hawkshead Road and Gobions Woodlands. I believe it is appropriate for such an opportunity to be taken as part of the local plan process.

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I maintain the council and their consultants have accorded inadequate weighting to the importance of defensible Green Belt boundaries demonstrated by the illogical site selection and endless reliance on mitigation.

I would request that this issue is reviewed in the context of defending the existing and improving revised hard Green Belt boundaries for Brookmans Park as a whole.

Professional etiquette requires I make the statement that the views expressed in this representation are not necessarily those of the RICS.

M.Connor FRICS