

Land North of Bradmore Way,
Brookmans Park

PINS Reference: APP/C1940/W/22/3307844

LPA Reference: 6/2022/1097/ OUTLINE

Opening Statement on behalf of the Combined Objectors Group

1. The Combined Objectors¹ alongside the Parish Council represent truly local interests and strongly oppose this application for permission in principle for 125 dwellings, a care facility for up to 60 bedrooms and a scout hut. The proposal will harm the character of the area, undermine the visual landscape, introduce large amounts of traffic onto unsuitable and narrow roads and will, most significantly of all, encroach on the green belt.
2. This case is simple. It is contrary to the local development plan. There can be no doubt that were this case assessed against the development plan (as statute requires) permission would be refused. This outcome can *only* be avoided if there are sufficiently strong material considerations which justify departure from the principle of plan-led development.
3. The combined objectors will demonstrate that there are no material considerations that warrant departure from that plan. Specifically, the benefits of the scheme (such as they are) do not *clearly* outweigh the severe and substantial impacts and therefore there are no very special circumstances that warrant this substantial encroachment into the green belt.
4. Critically, we impress upon the inspector that the adverse impacts of this scheme are not the *inevitable* result of development to ease the housing pressures within the London environs, but they are adverse impacts arising from this substantial development on this site and its location.
5. With regards to the assault on the character of the land, you will hear from Jed Griffiths who will bring his many years of experience to explain that the impact will be legion and severe.

¹ North Mymms District Green Belt Society, in partnership with the Brookmans Park Action Group, and CPRE Hertfordshire – the Countryside Charity.

6. With regards to the character of the site, it is rural and development will fatally undermine that character:
 - a. The site is in the countryside. No amount of exposition from the appellant can detract from the fact that when one is in on the site, the field, the character is rural. The photographs supplied by Mr Griffiths of the site at harvest time demonstrate a tranquil, serene and rustic character.
 - b. The Site occupies the Potters Bar Landscape Character Area (LCA54) and exhibits the characteristics of the areas of historic parkland. Critically, the landscape reflects its history with even the golf courses retaining the features of the original parkland.
 - c. The character of the land is not just informed by the visual aspects, but by a wide range of considerations such as history, associations and the undoubted openness of the land. You will hear from Mr Griffiths who will call upon his intimate knowledge of the area and his years of experience to demonstrate that the land's rich tapestry elevates its character and susceptibility to harm.
 - d. The imposition of a housing estate will abolish that pre-existing character which is justifiably highly valued by the local residents.
7. With regards to the visual impacts, the appellant is labouring under the misapprehension that this site is within the 'urban fringe'. It is not. It resides neatly within the countryside: As Mr Griffiths will explain:
 - a. There is a clean and sharp break between the settlement edge and the site.
 - b. The view to the North is of open and expanding countryside with a backdrop of the woods.
 - c. The views within the site allow almost 360° appreciation of nature. Due to the topography of the site, the effect of the existing housing is contained and restrained. There is no urbanising edge here.
 - d. The site is a rare opportunity to easily access and appreciate nature and the countryside from within Brookman's park.
 - e. Should permission be granted, these views will be fatally undermined—particularly the open view of the Countryside facing North from Brookman's Way and local residences. This clear and clean view from the edge of the settlement will be adverse and severely affected.

8. The Combined Objectors remain deeply concerned that the highways impact of this scheme has not been fully appreciated. In outline, the Combined Objectors are deeply concerned that:
 - a. The 'baseline' traffic survey is not sufficiently robust;
 - b. the predicted figures for traffic generated are sufficiently robust;
 - c. the cumulative impact of having the development and existing residences use of a single point of entry at the junction at Brookmans Avenue and Bradmore Way has not been fully appreciated;
 - d. Bradmore way cannot withstand further traffic particularly at school drop off and collection times without severe impacts;
 - e. idling engines and distressed parking will result in unacceptable health and safety impacts

To support these concerns, the inquiry will hear evidence from Chris Callaway of Paul Basham and local residents. The inspector will be invited to undertake a separate site visit to appreciate the challenges posed by school drop off and collection.

9. The appellant is going to present a plethora of evidence (much of which is not in dispute) seeking to justify inappropriate development on the green belt. Regardless of the strength of that evidence (even taken at its highest), the benefits of the scheme do not clearly outweigh the impacts and there are no very special circumstances that justify development upon the green belt.
10. Any development on the Green Belt is inappropriate and the preservation of the green belt permanence demands substantial weight. However, the nature of this site means that preservation of this part of the Green Belt demands especial importance. Mr Griffiths will explain that:
 - a. The site serves the first three green belt purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment.
 - b. With regards to first purpose, Mr Griffiths will call upon his decades of experience and explain how the London Metropolitan Green Belt within Hertfordshire has prevented the unrestricted sprawl of London and how this site in particular is critical to maintaining this critical restraint.

- c. With regards to the second purpose, Mr Griffiths will explain how maintaining the gaps between second and third tier settlements is of strategic importance and that this site is critical to maintaining the gap between Brookmans park and Welham Green despite the mechanistic evidence of the Appellant.
 - d. There is no dispute that this development will amount to encroachment into the countryside and would compromise the openness of the green belt. This is a large encroachment and that will warrant considerable justification.
11. Thus, the Inspector will be invited to give weight above and beyond the policy minimum of substantial weight to Green Belt issues in this case before factoring in the ‘other harm’ of impact on landscape, character, highway impacts and undermining the principle of planned development. In addition, the context in which this application has to be assessed has to give due consideration to the development of the Local Plan which is closer to adoption.
12. In that context, we will argue that it simply impossible for the appellant to demonstrate that the ‘benefits’ of the scheme *clearly* outweigh these impacts. Specifically, the housing, affordable housing, care facility (and scout hut) are considerations that undoubtedly attract a range of weights but separately and cumulatively cannot trump the clear and weighty steer from the NPPF (amplified by the recent Ministerial statement and proposed changes to the NPPF) that the green belt should remain open for the benefit of generations to come.
13. For all these reasons and on the basis of the Combined Objectors’ and the Council’s expert evidence, this appeal should be dismissed.

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