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Via Email: d.elmore@welhat.gov.uk; p.comments@welhat.gov.uk

19 February 2024

Dear Mr Elmore

Objection to 6/2023/2418/OUTLINE

I would like to object to the above reference outline planning application for the following reasons:

- The proposal is to build 150 retirement units on Green Belt Land. There is no evidence of very special circumstances (VSC) to support this application as would be required under The National Planning Policy Framework (NPPF) guidelines.
- In Oct 1984 a similar retirements home scheme was refused on this site as the development would be visible when viewed from the North and the East to the detriment of the rural character of the area which is designated as being of great landscape value - Appeal Decision: Appeal Dismissed S6/1985/0710/OP - Location: Hook Kennels, Coopers Lane Road, Northaw, Potters Bar - Proposal: Site for 220 accommodation units with landscaping, footpaths and parking and use of property as an institution for boarding + maintenance of old people - Decision Date: 15/09/1986. Nothing has changed since then to justify a further application.
- There has been no evidence of economic activity on this site for the past 40 years, so it is effectively abandoned land.
- The previous activity claimed in the application was not conducive with human habitation, as these were in fact dog kennels. Kennel staff were accommodated in either the houses, now privately owned, in Hook lane or in the buildings which are now part of the Oshwal Centre
- The photos submitted as 'evidence of previously developed land (PDL)' in the PDL statement show old gates, fences and pieces of corrugated iron in disrepair which in my view does not support the applicants claim this was PDL. The photos of the foundations do not depict foundations that would support human dwellings.
- The claim in section 4.3 of the PDL statement that It has been demonstrated that the site is not isolated but instead surrounded by an existing community known as Northaw Park and a religious institution at the adjacent Oshwal Centre and the site therefore forms part of a wider enclave of development within the Green Belt, is just illogical as these are two isolated and independent self contained developments with no access to transport, facilities etc.as would be required under NPPF.
- The application has not demonstrated adequately how the proposed development would have a measurably positive impact ('net gain') on biodiversity, compared to what is there currently.

- There is no utilities/water/sewage infrastructure in place or the potential to install this as would be required to comply with the environment agency conditions.
- There is no transport infrastructure.
- NPPF paragraph 113 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. The Transport Decarbonisation Plan and DfT Circular 01/2022 also set out that we need to move away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as 'vision and validate'). The transport assessment submitted is full of erroneous facts and unsubstantiated claims.
- There is no demonstrated need for this type of dwellings in the Development Plan (WHBC Local Plan and NCPC Neighbourhood Plan). The plan is less than a year old and the adopted housing trajectory demonstrates a supply of sufficient housing sites. In addition, given the potential costs of purchasing the proposed dwellings and associated services and other charges this would be out of reach of the majority of people in the locality wishing to 'downsize and stay local'. In fact, having scrutinised the numbers, my view is that this plan would not be financially viable for a developer. Therefore, my overriding concern is that should outline planning permission be granted, the site would then be sold on to a developer who would most likely come back with a planning application for change of use from C2 to C3.
- There are several retirement facilities currently serving the immediate area which have easy access to utilities, transport and shops as per the **Active Travel England Standing Advice Note: Active travel and sustainable development** and the numerous national policy and guidance documents that set out how the planning system and the delivery of sustainable development can help meet the government's active travel objectives.
- NPPF paragraph 105 also prescribes that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. In this regard, a mix of local amenities should be provided within an 800m walking distance of all residential properties or staff entrances for workplace facilities, while a bus stop with regular service(s) should be located within 400m. Local amenities may include but not be limited to a food shop, park or green space, indoor meeting space, primary school, post office or bank and GP surgery. All developments that include new dwellings should demonstrate how local schools, colleges and higher education institutions will be accessed by active travel modes.
- Moreover, a high-quality walking connection should be provided from the site to a regular public transport service that enables people to carry out daily duties such as accessing employment and education opportunities. Effective and convenient public transport should be available either through proximity to existing routes or through the provision of new or extended routes. For certain types and scales of development, LPAs should also consider bus stop and rail station (where applicable) facilities that enable ease of access by active travel modes. These can include secure and overlooked public cycle parking, cycle facilities (e.g., repair stands, air pumps and changing areas), seating provision, lighting, adequate shelter to accommodate likely demand, service information (including real time information) and raised kerbs at stops.
- LPAs should refer to appropriate design guidance including Manual for Streets, Inclusive Mobility and CIHT's Designing for Walking for further details but, as a minimum, ATE expect walking routes to:

- be 2m wide (with limited pinch points of 1.5m due to street furniture) and localised widening to accommodate peak usage.
 - be step-free.
 - have a smooth, even surface.
 - be uncluttered.
 - have street lighting; and
 - include appropriate crossings in compliance with LTN 1/20 Table 10-2 and Inclusive Mobility.
- The nearest main road is a 60 MPH country lane and is unlit and unpaved. The nearest bus stop is some 1200 meters away and which is only for a twice a day bus service. The nearest train station – Potters bar is approx. 3500 meters away and the closest shops are approx. 1500 meters away.
 - The access road to Firs Wood Close which leads to the area of the proposed development is in grave disrepair and quite narrow. It would not support increased traffic flow and large construction vehicles that would be required to access the site to develop it. Similarly, it would not support increased traffic flow of residents, staff, delivery vehicles and visitors should the proposed development be built.
 - The proposed site for development sits in a flood plain. The site, when I first moved in 3 years ago, was completely screened by and populated with mature trees. In the past year or so a substantial amount of felling has been undertaken by Swing Ltd's contractors. This means that the soil is not being sufficiently supported by trees to absorb water and could potentially increase the flood risk.

In conclusion for all the reasons listed above I strongly object to the proposed planning application which I hope will be rejected accordingly.

Yours sincerely

