

# **North Mymms District Green Belt Society**

**June 2019**

**Responses to the Call for Sites Consultation**

**Welwyn Hatfield Borough Council (7<sup>th</sup> May 2019)**

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## FOREWORD

This report has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the North Mymms District Green Belt Society. It sets out the Society's response to the Call for Sites consultation document, issued by Welwyn Hatfield Borough Council on 7<sup>th</sup> May 2019.

The Borough Council received 140 replies to the call for sites, over 40 of which were located in the Parish of North Mymms. Many of the sites had been promoted during earlier consultations on the Local Plan and had been rejected. The Society had lodged objections to those sites, and wishes to make it clear that those objections stand.

The following pages contain the Society's comments on each of the promoted sites in the order set out in the consultation document. It is appreciated that there needs to be some organised structure to the response, so that it can be analysed by the Borough Council planning team. Nevertheless, there must be concerns with this methodology, with its focus on individual sites, rather than the overall strategy for the Borough.

In addition to the comments on each of the sites, the Society wishes to state its concerns about the potential cumulative effect of sites if they were to be developed. The Stage 3 Green Belt Study has already highlighted the importance of the gap between Potters Bar and Hatfield. The high ratings of harm to the west of Brookmans Park clearly illustrate this point. The Society is also mindful of the cumulative effects of development along the A1000 Great North Road. In previous representations on sites, and to the Stage 3 Green Belt, the Society has raised serious concerns about potential developments at Bell Bar. In the current consultation, more sites have been promoted. Together, these could convert a scattered hamlet of some 50 buildings into a township of around 400 dwellings, with no facilities and services, exerting severe pressures on the A1000. Bell Bar is built on a ridge – any development, particularly on the transmitting station, would have an invasive effect on the Green Belt and surrounding countryside. To the south of Bell Bar, the two promoted sites to the north and west of Queenswood School, for a total of 750 dwellings, would cause similar problems.

Adding in the promoted sites at Swanley Bar and Little Heath, plus the allocated and promoted sites at Marshmoor, there is a clear prospect of a continuous urban strip along the line of the Great North Road. The Green Belt would cease to exist.

At the northern end of the parish, there are a number of sites which have been promoted around Welham Green, several of which were previously rejected in the Submission Local Plan. The Society wishes to emphasise that the previous objections stand. The introduction of the proposed 2FE primary school does not remove the fundamental objections to these developments on Green Belt grounds.

The Society also seeks to stress the importance of the strategic gap between the south of Hatfield and Welham Green, where the A1001 provides a distinctive boundary to the urban edge. Here and to the west of Welham Green, there is a strong linkage to open countryside.

Taken together, the promoted sites in North Mymms could produce in the region of 4,000 dwellings. Additional pressures will clearly emerge from emerging Local Plans in adjacent local authorities. In the current review of the Hertsmere Local Plan, there are concerns about possible developments on the northern edge of Potters Bar, and a potential new settlement at Tyttenhanger. It is imperative that the two local authorities should work together to protect the Green Belt and avoid a grid lock in infrastructure.

Together with other representors, the Society has expressed its concerns about the way in which the Local Plan has been driven by housing numbers, which are considered to be excessive. It is hoped that there will be a reduction in the overall requirement and an increased emphasis on Green Belt protection and management. As it stands the Local Plan lacks an overall vision and strategy.

The Society will be pleased to elaborate on any of its comments on the individual sites. At Stage 6 of the hearings, the Society will be giving detailed representations on each of the chosen sites, plus those which have already been allocated in the Local Plan.

## Promoted Sites at Bell Bar and Brookmans Park

### Site BrP1: Upper Bell Lane Farm

The site (5.2 hectares) has been previously promoted in the HELAA 2016. Its estimated capacity is 140 dwellings. In December 2015, the Society submitted detailed comments to the Borough Council on a proposal by Aurora Properties for the development of the site for housing. The site was not allocated for housing in the Submission Local Plan.

The site is in the Green Belt, beyond the northern edge of Brookmans Park. It is currently used for the grazing of animals and is open in nature. Bell Bar is a dispersed settlement which is currently “washed over” by the Green Belt.

The site is not in a sustainable location and is not within comfortable walking distance of the centre of Brookmans Park and its railway station. Although it is close to the Chancellors secondary school, it is remote from the Junior School in Bradmore Way, Brookmans Park. As a result, any development of this area would result in high levels of car ownership and movement, with increased pressure on the A1000 road to the east. There would also be overloading on local thoroughfares, particularly Bell Lane, which would destroy the essentially rural character of the surrounding area.

In its submission of March 2015, Aurora Properties provided a landscape study of the site by Liz Lake Associates (LLA). The study concluded that the area had a “medium to high” capacity to accept development. The Society commented that this was based on an assessment of the internal characteristics of the site. In terms of its place in the local landscape structure, it clearly has some value. The County Council ecologist, responding to the proposal called for a more detailed study of its ecological attributes. Although the bulk of the area is grassland, the margins were likely to be important in terms of tier habitat value.

The site has been assessed by successive Green Belt studies. In the latest Stage 3 Study, prepared by LUC consultants, Bell Bar was included in an assessment of the “washed over” settlements. In its response to the report, the Society has been critical of the methodology which involved the fragmentation of the area into separate “parcels”. Each parcel was then assessed in terms of its contribution to the purposes of the Green Belt. Thus, site BrP1 has been identified as parcel 72 in the Study. In the detailed analysis of each parcel (in Appendix 6.1), the development of parcel 72 was considered to have a moderate degree of harm to the Green Belt. In Appendix 5.2, however, when combined with the potential development of the other parcels in and around Bell Bar, the potential harm was rated as “moderate to high”.

This conclusion serves to endorse the Society's view that the cumulative development of sites at Bell Bar would cause serious harm to the Green Belt. It would contribute to the coalescence of the settlements between Potters Bar and Hatfield along the line of the A1000 road. Site BrP1 therefore needs to be protected from development.

**Site BrP26 “Meadowcroft”, Great North Road, Bell Bar**

The site (0.38 hectares) is in the Green Belt to the northeast of the Great North Road at Bell Bar. It is currently in residential use, and is occupied by a single dwelling (“Meadowcroft”). The estimated capacity for housing is only five dwellings. It was previously considered and reviewed in the HELAA 2016, but was rejected. The western boundary of the site is defined by a belt of mature woodland.

In the Stage 3 Green Belt Study, the site lies within parcel 70, which covers the Woodside Lane area. The overall assessment of this parcel to Green Belt purposes is rated as “moderate”. It is considered, however, that there are no consistent boundaries that would define the limit of the Green Belt beyond existing field boundaries. The impact of the loss of Green Belt to the north and east of the A1000 is recognised in the analysis, and is endorsed by the assessment of Bell Bar in Appendix 5.2 of the Study.

In any event, development of the isolated “Meadowcroft” site would make very little contribution to the housing needs of the Borough.

**Site BrP33, Firs Stables, Woodside Lane, Bell Bar**

The site (0.8 hectares) is to the east of Woodside Lane. It was formerly used for stables, but is currently vacant, and is in an untidy state. There are some remains of buildings which have been demolished and parts of the site are covered with heaps of spoil material. To the east of the site, there is an extensive area of mature woodland.

The capacity of the site is estimated at 27 dwellings, which is at a much higher density than the other residential areas in Woodside Lane. A recent outline application for the development of the area for housing was refused by the Borough Council on Green Belt grounds. The main access to the site is on a bend in Woodside Lane and is unsatisfactory.

In the Stage 3 Green Belt Study, the site is within parcel 70. The overall assessment of potential harm to Green Belt purposes is described as “moderate”. Nevertheless, the Study recognises the issue of extending the Green Belt boundary across the A1000. This conclusion is endorsed by the assessment of Bell Bar as a “washed over” settlement in appendix 5.2 of the Study.

**Site BrP35 Bell Bar Pet Farm, Bell Lane and Aylmer Motorworks, Bell Bar**

The site (0.6 hectares) is between the Great North Road (A1000) and Bell Lane. Its estimated capacity is 15 dwellings. It is currently “washed over” by Green Belt and is occupied partly by residential properties and a car repair workshop. To the north, the site is bounded by housing and the “Cock of the North” public house. To the south is the open area of site BrP1. A recent planning application for the redevelopment of BrP33 was rejected by the Borough Council on Green Belt grounds.

In the Stage 3 Green Belt Study, this site was included as part of parcel P68, which contains the bulk of the small scattered hamlet of Bell Bar to the south of the A1000. Unsurprisingly, the rating of potential harm to the Green Belt was assessed as “moderate – low”. When combined with the other parcels in Bell Bar, however, the overall assessment was rated as “moderate – high”. This supports the Society’s view that the cumulative development of sites at Bell Bar would result in serious harm to the Green Belt.

In any event, the scale of development proposed on this site would make very little contribution to the overall housing needs of the Borough Council.

### **Site BrP5 Land West of Brookmans Park**

The site lies to the west of the East Coast main railway line and Station Road, with Bradmore Lane at the southern boundary. It is currently in agricultural use for the growing of crops.

The site was previously reviewed in the SHLAA Phase in 2012, but was not promoted at the time of the HELAA 2016. At that time, it included an area between Station Road and the main railway line. Compared to the original submission, the area to the east of Station Road has been omitted, but the site has now been extended to the north. The total area promoted is now 11.5 hectares, with an estimated capacity of 290 dwellings.

The site lies to the north of site BrP4, which is one of the sites allocated for development in the Submission Local Plan. The Society has lodged strong objection to site BrP4 and to any development to the west of the railway, which forms a very strong Green belt boundary. Many of the points raised against BrP4 are also applicable to site BrP5.

In the Stage 3 Green Belt Study, the site has been assessed as part of a larger parcel (P65). The assessment of harm to the Green Belt is rated as “very high” – a view which is strongly supported by the Society. As the Study points out, the open character of the site is important – its release would lead to encroachment on the countryside. Its location in the gap between Brookmans Park and Welham Green would significantly harm local settlement separation and would be to the detriment of the separation between the towns of Potters Bar and Hatfield.

To the north west of the site is the Potterells Wood Local Wildlife Site, which is also classified as ancient woodland. The western edge is within 500 metres of the Water End Site of Special Scientific Interest (SSSI). Both these features would be severely affected by any housing development, contrary to the National Planning Policy Framework (NPPF).

The southern boundary of the site is described by Bradmore Lane, a narrow thoroughfare of considerable rural character. It is used frequently by walkers and cyclists and has no capacity for the increase in traffic which would occur from such a substantial development.

### **Site BrP6 Land West of Bluebridge Road, Brookmans Park**

This site (12.1 hectares) was previously promoted and reviewed in the HELAA 2016. The estimated capacity is 210 dwellings. A detailed proposal was submitted by AECOM consultants in January 2015, on behalf of the Royal Veterinary College (RVC), the owners of the site. The Society sent its comments to the Borough Council in December 2015, objecting to the possible inclusion of the site in the draft Local Plan. Following the HELAA review, it was not allocated. In the view of the Society, circumstances have not changed. There are strong reasons for rejection of this site – these are summarised below.

The site is currently in arable use, as part of the RVC operational land. It is a prominent, very open, area and is a key component of the strategic gap between Brookmans Park, the Royal Veterinary College and Little Heath. The slope to the north would mean that any housing development would be ill-related to the southern boundary of Brookmans Park. It would degrade the approach to the village from the south.

The site lies within an important tract of countryside which runs from east to west to the south of Brookmans Park. This includes Gobions Woods, which is both an ancient woodland and a Local Wildlife Site, and the Grade II Registered Landscape of Gobions Park. The setting of the Registered Landscape would be significantly damaged by development on site BrP6, contrary to the NPPF.

In its previous submissions on this site, the Society made detailed comments about flood risk and surface water drainage. It was pointed out that the surface water drainage scheme proposed by AECOM was inadequate. The settlement of Water End, downstream of BrP6, is entirely within flood zones 2 and 3. Any surface run-off from the site would run into the Ray Brook, then into the Mimms Hall Brook near Water End. In extreme wet weather conditions, the Mimms Hall Brook would be overwhelmed, causing flooding at Water End. There is also the issue of water quality, of contaminated flood waters affecting the integrity of the swallow holes SSSI at Water End.

The Society has also raised concerns about the potential increase in traffic on Bluebridge Road, which is narrow in width. There is a narrow footpath, but only on the east side of the road. There is no footpath on the bridge over the Ray Brook, at the southern approach to Brookmans Park. Any development on the site would lead to substantial changes in road infrastructure, changing the character of the local roads from rural to semi-urban.

In the Stage 3 Green Belt Study, the site was part of assessment parcel P78, which had a rating of “very high” in terms of its potential harm to the Green Belt. The analysis was split into sub-parcels – the site was included in parcel P78a, which included sites to the east of Bluebridge Road. Here the rating was “high”. Both parts of the analysis serve to endorse the Society’s view that any development on this site would have a severe impact on the integrity of the Green Belt to the south of Brookmans Park.

### **Sites BrP9 and BrP9a Friday Grove, north of Hawkshead Road, Brookmans Park**

These two sites are considered together. Site BrP9 is the larger area (7.6 hectares), with an estimated capacity of 190 dwellings. The smaller area, site BrP9a (2 hectares) lies within BrP9 and has a capacity of 50 dwellings. The whole area is currently used as grazing land.

The larger site was previously promoted by Living Villages in representations on the draft Local Plan in January 2015. It was part of the HELAA assessment in 2016, but was not allocated in the Submission local Plan. In its representations to the Borough Council in December 2015, the Society objected to the site and its potential impact on the Green Belt. These views are unchanged.

As mentioned above in respect of site BrP6, any development on this site would impact on the important gap between Brookmans Park and Little Heath. The site is in open countryside in an important tract running east west to the south of Brookmans Park, centred on the Ray Brook Valley. Any development would cause harm to the Local Wildlife Sites of Gobions Wood and Moffatts Meadow, plus the Grade II Registered Park at Gobions. In their response to the 2015 proposals, Herts Ecology stated that development of the site would be “highly inappropriate”. The adverse effects of any development on this site would “significantly and demonstrably” outweigh the benefits, as set out in paragraph 11 of the NPPF.

Despite the suggestion in site BrP9a for a reduction in the area and the number of dwellings, the overall impact of this development would remain, together with the concerns raised above.

In the Stage 3 Green Belt Study, the site was located in assessment parcel P78, where the rating was stated as “very high”. It was also included in sub-parcel P78a, which was assessed as “high”. These conclusions endorse the Society’s view that any development on this site, whatever its size, would have a severe effect on the integrity of the Green Belt to the south of Brookmans Park.

### **Site BrP10 RayBrook Farm, Bluebridge Road, Brookmans Park**

The site (4.02 Hectares) lies to the east of Bluebridge Road. Its estimated capacity is 120 dwellings. Its current use is described as equestrian buildings, livery, and grazing land. The site owners are the Raybrook Livery Stables.

The site was previously promoted and reviewed as part of the HELAA 2016, but was not allocated in the Submission Local Plan. In its comments to the Borough Council, the Society objected to the principle of development on the site on Green Belt grounds.

The site forms part of an important tract of countryside to the south of Brookmans Park, centred on the Ray Brook Valley. It is also part of the strategic gap between Brookmans Park and Little Heath. To the east are the Local Wildlife Sites of Gobions Wood and Moffatts Meadow, together with the Grade II Registered Park at Gobions. Any development would threaten the integrity of these areas, both from an environmental and heritage perspective, contrary to paragraph 11 of the NPPF.

Development would also impact on the capacity of Bluebridge Road, which is essentially rural in character. There are limited footpaths on the road, with none at the bridge crossing the Ray Brook to the south of Brookmans Park.

Surface water drainage would be to the Ray Brook, which runs westwards to the Mimms Hall Brook. Any excess surface water would undoubtedly affect Water End and the swallow holes SSSI.

In the Stage 3 Green Belt Study, the site appears as a part of assessment parcel P78. The assessment of harm to the Green Belt is “very high”. The site is also part of sub-parcel P78a, which is rated as “high”. These conclusions clearly support the Society’s view that development to the south of Brookmans Park would seriously damage the integrity of the Green Belt.

### **Sites BrP12 and BrP12a Land to the north of Peplins Way, Brookmans Park**

The site was originally promoted by Aurora Properties in January 2015, and was assessed in the HELAA 2016. It was not allocated in the Submission Local Plan. The current promotion consists of two areas, the larger of which is 12.2 hectares with an estimated capacity of 125 dwellings. The smaller portion (BrP12a) is 8.4 hectares with a capacity of 87 dwellings. Both sites have provision for an 80-bed car home and a new scout hut.

In the consultation on the draft Local Plan, 131 respondents from Brookmans Park objected to the original proposal. The Society, in its comments to the Borough Council in December 2015, conveyed its strong objections to the development of the site. A summary of the Society's views, which have not changed, is set out below.

Both the larger and the smaller sites would project northwards beyond the boundary of Brookmans Park. The sites are located within the strategic Green Belt gap between Hatfield and Potters Bar, as well as the local gap between Brookmans Park and Welham Green. The Society considers that the sites make a significant contribution to the Green belt purposes set out in the NPPF. Previously, the area has been assessed as having a low capacity to accommodate landscape change.

Considerable concerns were raised in previous consultations about the potential impact of housing development on this site on traffic and movement. Both Bradmore Way and Peplins Way are narrow residential streets with insufficient capacity to handle the volume of traffic and car parking pressures, especially during the school terms. Even with the smaller scheme BrP12a, there would be a significant increase in car traffic on these roads, plus the additional vehicle movements, including ambulances, to an 80-bed car home. An increase in the size of the school to 420 pupils, plus 30 nursery places, would further exacerbate the situation. Details of the current problems relating to congestion and access were included in the Society's response of December 2015. Considerable flaws were identified in the draft Transport Assessment which accompanied the Aurora Properties submission.

A report on the landscape attributes of the site was prepared by Liz Lake Associates and included in the Aurora Properties submission. This accorded the area a low value, but this is clearly because the report looked at its internal characteristics from a landscape perspective. In landscape terms, it may appear to be largely open and featureless, but the analysis does not consider the ecological aspects. Herts Ecology, in its response to the Aurora Properties proposal, stated that this was shown as an Ecosite (Meadow South of Peplins Wood 78/063). It is adjacent to the Peplins Wood Local Wildlife Site and ancient woodland. To the east, the Brookmans Park Golf Course is also an Ecosite 78/064). Encroachment of urban development on the site would undoubtedly threaten the integrity of these features, both as wildlife habitats and strongly-defined landscape features.

In the Stage 3 Green Belt Study, the site is part of a larger assessment parcel P66, which runs to the north of Brookmans Park. The overall rating of potential harm is “moderate – high”. Site BrP12 was also assessed separately as sub-parcel P66a, with a similar rating. The commentary states that the release of the site would cause encroachment on the countryside. It also states, however, that the impact on the Green Belt could be more limited because of its containment by Brookmans Park, Peplins Wood, and The Golf Course. Nevertheless, it is acknowledged that its release would lead to the greater containment of the golf course and weaken its contribution to the Green Belt.

Compared to the conclusions of the Study about the sites to the west of the railway, these comments on the P66 parcel may be taken by some as support for development of BrP12. Against these views, however, there are the problems of traffic and movement in Bradmore Way and Peplins Way. These are seemingly insurmountable.

### **Site BrP14a East of Golf Club Road**

This small site (0.85 Hectares) is an extension to site BrP14, which is allocated for housing in the Submission Local Plan. No estimate is given of the dwelling capacity but this would be limited. Access from the east side of Golf Course Road would be difficult

No special circumstances have demonstrated to justify the release of this land from the Green Belt.

### **Site BrP31a 68 Georges Wood Road and land to the rear of 70 Georges Wood Road**

This site (0.5 hectares) is an extension to site BrP31, which was considered in the HELAA 2016. The number of dwellings is not specified, but the original site, at 0.09 hectares, could only accommodate four dwellings. Consequently, the Borough Council noted that the site “would only be allocated if it came forward as part of a wider allocation.” The current promotion seems to have been made in response to the Borough Council’s earlier statement.

In commenting on BrP31, the Society objected to the proposal in that it would encroach on open land beyond the defined boundary of the Green Belt on the northern edge of Brookmans Park. This view has not changed. Access to the extended site would appear to be gained by the demolition of the house at No. 68 Georges Wood Road. As the Society has noted, the road has a history of traffic problems, as it has been used as a short cut between the centre of Brookmans Park and the A1000 and the B158. A 20 mph speed limit was introduced to counter the problems of speeding traffic, but has not reduced the flow. Any additional access onto this road would be unacceptable.

### **BrP32 Land west of Queenswood School, Brookmans Park**

This is a new promotion, with a site area of 19.06 hectares and an estimated capacity of 450 dwellings. The site lies to the east of the A1000 road and is currently in agricultural use. It is part of a significant tract of open countryside which extends between Brookmans Park and Cuffley, characterised by open fields, mature hedgerows and large woodlands.

In the Stage 3 Green Belt Study, the site was part of assessment parcel P76, which included the buildings and grounds of Queenswood School to the east. The harm rating was “high”, with a comment that “its release would result in significant encroachment on the countryside.” The Study also concluded that release “would breach the strong continuous boundary of the A1000 and would also result in a significant extension of the urban edge of Brookmans Park to the east.”

The Society supports these conclusions and would object in the strongest possible terms to the development of this site. It should be rejected out of hand.

### **Site BrP34 Brookmans Park Transmitting Station**

This large site (23.84 hectares) is to the east of the A1000 and has been in use for several decades as a radio transmitting station. Some of the site is occupied by buildings and transmitting equipment, but the area is largely open in appearance. Its masts are a prominent feature of the local landscape and can be seen from many parts of Hertfordshire and North London. With changes in technology, its redundancy has been expected.

The proposal is to redevelop the site for mixed use, including housing, an elderly care community, and employment. Part of the site would be retained for telecommunications-related development. The promoted capacity is 220 – 225 dwellings, 2,450 square metres of elderly care accommodation, a “commercial hub” of 6,550 square metres, plus some retained buildings.

In the Stage 3 Green Belt Study, the site forms the majority of the area of assessment parcel P73. It is also included in the analysis of Bell Bar as a “washed over” settlement. In the detailed assessment of the site’s contribution to Green Belt purposes, the report concludes mainly that there would be a “limited or no contribution.” The overall rating of harm, however, is “moderate – high”. This is clearly because release of the site would “significantly” extend the urban area of Brookmans Park and would weaken the continuity of the A1000 boundary to the south of Brookmans Park.

The Society notes these views and recognises that this may be interpreted by the promoters as a “brownfield” site, albeit covered by the Green Belt. Rather than release the site from the Green Belt in the Local Plan, the Society suggests that it should be treated as a major exception site, similar to the Royal Veterinary College. The future development and management of the site should be dealt with by a master plan, with associated landscape proposals which would serve to mitigate the impact of development on the surrounding countryside.

There is no doubt, however, that the amount of development promoted on the site is excessive and would be disastrous in terms of the openness of the Green Belt. The site coverage needs to be reduced considerably so as to minimise the impact on the Green Belt. Development would undoubtedly cause major traffic issues on the A1000 and the local road network.

### **Site BrP36 Land at Brookmans Park Golf Club**

The site (2.4 hectares) is owned by the Golf Club and consists mainly of a car park, a practice green, the clubhouse, and the tennis club courts. The estimated capacity is 23 dwellings.

It is understood that the Golf Club wishes to develop a new clubhouse on an adjoining site, and wishes to redevelop this site for housing. Technically, this is a “brown field” site, although it is “over-washed” by the Green Belt. Nevertheless, development of housing on the site would lead to an increase in traffic on the narrow Golf Course Road.

There would be some impact on the Green Belt by the intensification of development associated with the Golf Club. In the Stage 3 Green Belt Study, the site is included in assessment parcel P66, the majority of which consists of the golf course, with block of woodland. The harm rating for the whole of the parcel was “moderate-high”, as its development would encroach on the surrounding countryside. Some parts of the parcel were assessed separately – sub-parcel P66c (site BrP14) is land to the west of ~Golf Club Road. This area had a harm rating of “moderate – low”.

As BrP36 is contained by existing development, a similarly low rating would seem applicable. In the view of the Society, however, there is no need to release the area from the Green Belt. No special circumstances have been advanced. Any proposal can be dealt with more appropriately as a possible exception to policy.

### **Site BrP37 Brookmans Park Reservoir and Tower**

The site (2.76 hectares) is to the east of the Brookmans Park Transmission Station, with access from Kentish Lane. It is promoted for employment use, but with no specified capacity.

Technically, this is a “brown field” site, with existing development, but within the Green Belt. Significantly, it was not included for assessment in the Stage 3 Green Belt Study. It is on the edge of an area of attractive open countryside to the north of Kentish Lane, which should be protected. The Society understands the need to recover the site, but considers that any proposal should be dealt with by development management on its merits. There is no compelling need to release the site from the Green Belt.

## **Promoted Sites: Welham Green**

### **Site WeG1 Units 1-3, 51 Welham Manor, Welham Green**

This small site (0.4 hectares) is within the Green Belt but is currently in use as a workshop for the repair, maintenance, and paint-spraying of motor vehicles. The proposed use is for housing, with an estimated capacity of 18 dwellings. It was previously promoted and reviewed in the HELAA 2016, but was not allocated in the Submission Local Plan.

The Society has previously objected to the release of this site and its neighbours during consultation on the draft Local Plan. It is at the end of Welham Manor, a narrow cul-de-sac. Any additional traffic would cause congestion in Welham Manor and at the junction with Dixons Hill Road.

In the Stage 3 Green Belt Study, the site was located in assessment parcel P64. Together with the adjacent Stage 2 site WeG2, it was assessed as a sub-parcel P64a. It was considered that together these sites do not make a significant contribution to Green Belt purposes. It was concluded that their release would not compromise and would not extend the existing settlement edge beyond the existing line to the west. The harm rating was stated as “low”.

The Society notes these conclusions, but maintains its objection in principle to the release from the Green Belt of site WeG1. There is a real concern that development on this site would lead to pressures for future development beyond the area, on sites WeG2, WeG3, and WeG3a.

### **Sites WeG3 and WeG3a South of Welham Manor, Welham Green**

The site WeG3 (2.1 hectares) was previously promoted by Hill Residential Development in response to the Local Plan consultation in January 2015. Its estimated capacity is 45 dwellings. Sites WeG3a is an extension to the original proposal, to the west of Station Road. This would bring the total area up to 2.7 hectares, with a capacity of 74 dwellings. The bulk of the two areas are used as grazing paddock and agricultural land; the extension also contains two dwellings and garden land.

One access to the sites would be from the Welham Manor cul-de-sac. For the larger site, there would be an additional access from Station Road, involving the demolition of an existing dwelling house.

The Society provided a detailed objection to the original WeG3 proposal in March 2015. It was subsequently reviewed in the HELAA 2016, but was not allocated in the Submission Local Plan. In the Society's view, nothing has changed. A summary of the Society's views is set out below.

Despite the additional access point, there would be considerable problems emanating from the additional car traffic generated by the proposed developments. Both would have access from Welham Manor, which leads to Dixons Hill Road, the main traffic route through the village. This road operates at capacity, especially during peak hours, and is the main link to the A1(M) – and onwards to the M25 at junctions 23 South Mymms and 22 London Colney. The additional access at Station Road would also contribute to the congestion at peak times.

The submission documents on the original site WeG3 included a landscape assessment and strategy, the conclusions of which were disputed by the Society. In the Society's view, the site would be highly visible from the south, Station Road, and from Dixons Hill Road to the west of the village. The site and its extension would extend in an area of undeveloped Green Belt. It would result in weaker and illogical Green Belt boundaries that would greatly increase the risk of further encroachment on the countryside. The Society has previously noted the conclusions of the Welwyn Hatfield SHLAA Phase 2. This stated that WeG3 was not identified as suitable because "it does not relate well to the existing settlement boundary. The landscape to the south is open so the site is visually intrusive on the Green Belt and lacks a defensible Green Belt boundary."

Despite this, the site was assessed in the SHLAA Phase 2 as being "suitable". Eventually, it was rejected in HELAA 2016 and was not allocated in the Local Plan.

In the Stage 3 Green Belt Study, the site is part of a larger assessment parcel P64, with a harm rating of “moderate – high”. The original site WeG3 is included in the assessment of a sub-parcel P64c, together with sites WeG1, WeG2, and the allotment area to the west of Station Road. The harm rating is stated as “moderate”, but this is clearly contradictory to earlier assessments.

### **Site WeG6 Skimpans Farm, Bulls Lane, Welham Green**

The site (4.1 hectares) is situated to the south of Bulls Lane, Welham Green, with an estimated capacity of 75 dwellings. It was previously promoted by Landform Estates in January 2015, and was reviewed in the HELAA 2016, but was not allocated in the Submission Local Plan. The Society objected to the removal of the site from the Green Belt, and submitted a detailed report to the Borough Council in December 2015. There has been no change in circumstances and the Society maintains its objection to development of the area.

The site is currently used for the grazing of horses and has an open aspect to the south from Bulls Lane. Further to the south, Peplins Wood provides an attractive setting to the area. As the Society has pointed out, there has been no change to this character of this site for at least 50 years. A number of planning applications have been refused in the past on Green Belt grounds. Beyond the northern edge of the site is the listed farmhouse and outbuildings of Skimpans Farm. Any development on the site would have a major impact on the setting on the house and its gardens, contrary to s66 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.

The southern part of the site is contained within Flood Zone 2/3. For the 2015 promotion, an indicative Master Plan was prepared by Barton Willmore, arguing that housing development would be to the northern extremities of the area and would not encroach on the area at risk of flooding. This view was derived from a technical note on flood risk and drainage compiled by Cannon engineering consultants. The report did not mention that there had been a history of surface water flooding on other parts of the site. There had also been recorded incidents of flooding and sewage problems on properties in Station Road to the west of the site. Thames Water has still been unable to resolve these problems, although the Borough Council was informed in 2015 that the situation would be investigated. This is part of a wider problem in the area to the south of Welham Green where surface water drainage would run into local watercourses, ultimately increasing flood risk and affecting water quality at the Water End Swallow Holes SSSI.

Cannon also prepared a technical note on highways and transport in support of the 2015 promotion. A number of deficiencies in the report were identified by the Society. In particular, the consultants appeared to under-estimate the amount of traffic which would be generated by the development of the site, and the effect on the surrounding highways network between the A1000 and the A1(M). Bulls Lane to the north of the site is a narrow rural thoroughfare connecting Welham Green and Bell Bar. Both Bell Lane and Bulls Lane are classified as recommended routes for cycling, and are part of a circular route cited by Hertfordshire Countryside Management as part of their aim to promote and enhance the enjoyment of the countryside. Already visibility in Bulls Lane is restricted by bends in the road – the verges are degraded by passing vehicles using it as a “rat run”. There is an acute problem at the junction with Holloway Lane. These issues would be exacerbated by development at Skimpans Farm.

In the Stage 3 Green Belt Study, the site is contained entirely within assessment parcel P58. The harm rating is described as “moderate - high”, mainly because of its containment by residential development to the north and west, the railway to the east, and woodland to the south. It is the view of the Society that this rating is too low. In the Stage 2 analysis and all previous assessments, the site has performed strongly against Green Belt purposes. The Stage 3 Study acknowledges that the encroachment on the countryside would be significant. Bulls Lane, at the northern edge of the site, provides a very firm boundary to the village of Welham Green and should not be breached.

Consideration of Green Belt is but one aspect of this proposal. In terms of the NPPF, the issues of infrastructure, flood risk, and drainage should also be weighted “significantly and demonstrably” against the release of the site for development.

### **Site WeG10 Land at Dixons Hill Road, Welham Green**

The site (4 hectares) is to the north of Dixons Hill Road on the western edge of Welham Green. Its estimated capacity is 120 dwellings. The current use is grassland, used for the grazing of animals. It was reviewed in the HELAA 2016, but was not allocated in the Submission Local Plan.

The Society has previously objected to the release of the area from the Green Belt. Visually, this is a very open site on approach to the village from the west, and is bounded to the north by a recreation ground. Further to the northwest is Bush Wood, which is an ancient woodland and Local Wildlife Site. In landscape terms, the open aspect of the site is significant and forms a distinctive break between the edge of the village and the countryside beyond.

Bush Wood is also important, not only for its wildlife value, but also as a part of the landscape setting of Welham Green. It is a typical Hertfordshire bluebell wood and forms a very important breathing space for local people, much used for walking and recreation. Housing development on WeG10 would result in urban fringe pressures, which threaten the integrity of the woodland habitat and wildlife species. In previous consultations, Herts Ecology has also registered its concerns and considers that a “constraint buffer” would be needed between any housing development and Bush Wood.

The site is fairly flat, and residents have previously provided evidence that it is prone to surface water flooding. Thames Water has also advised that there would be pressure on waste water services. Local capacity was “unlikely to be able to support development” of this scale.

At this location, there are many concerns about the capacity of Dixons Hill Road and the local highways network. To the west, there is the access to the southbound carriageway of the A1(M) – traffic also enters the village from the northbound slip road on the motorway. Entrance to the village from the west is on a pronounced curve and there are clearly problems with speeding traffic, despite traffic calming measures in Welham Green.

In the Stage 3 Green Belt Study, the site is part of assessment parcel P61, which has a harm rating of “moderate – high”. There is a separate assessment of the site itself, as sub-parcel P61B, with a harm rating of “moderate.” The Study also combines parcels P61 and P62, with a rating of “high”. This reinforces the Society’s point about the importance of the tract of countryside to the west of Welham Green – to the A1(M) and beyond.

### **Site Weg11 Land at Marshmoor Lane, Welham Green**

The site (0.46 hectares) is long and narrow and is located between Marshmoor Lane and the main East Coast railway line. Its estimated capacity is only 14 dwellings. The area was previously reviewed in the HELAA 2016, but was not allocated in the Submission District Plan. It is a fragmented site, mainly of rough pasture, divided into paddocks.

In its previous views on this site, the Society considered that, in environmental terms, this was a very poor site for housing. Noise levels from the adjacent railway are very high. The access to and from Dixons Hill Road would be highly dangerous, at a junction close to the railway overbridge. The surface of Marshmoor Lane is poor and suffers from frequent flooding. In terms of sustainability, the site is separated from Welham Green and its facilities and services.

In Green Belt terms, development of this site would compromise its openness and integrity to the south of Hatfield. The Society has set out its detailed objections to the development of Marshmoor as a whole, as set out in the Local Plan. The main railway line forms a very distinctive Green Belt boundary between the Travellers Lane industrial site and the countryside beyond.

### **Site WeG12 Land north of Pooleys Lane, Welham Green**

The site (4.8 hectares) lies to the north of Pooleys Lane and to the west of the Travellers Way industrial estate. It has an estimated capacity of 79 – 140 dwellings. The area was reviewed in the HELAA 2016, but was not allocated in the Submission Local Plan. It is currently used as grazing land for horses and ponies, with stables on the north-west corner of the area.

In 2015, the site was promoted by DLA Town Planning (on behalf of Mr D Collins). The Society set out its detailed objections to the release of the area from the Green Belt (December 2015). These points are summarised below.

This is a very open site and its development would clearly increase the coalescence between Welham Green and the southern edge of Hatfield, especially if site HAT11 were to be confirmed as a housing site.

Access is difficult. To the south of the site, Parsonage Lane is a narrow residential road, and there is much on-street parking. The original DLA report claimed that the site was “highly accessible”, point which was refuted by the Society.

In the Stage 3 Green Belt Study, the whole site comprises parcel P60, with a harm rating of “moderate”. The Society considers that this should be higher, as the site is very open and is adjacent to the Parsonage Lane Local Wildlife Site, to the west. The Study does conclude that there would be “significant” encroachment on the countryside.

### **Site WeG15 Potterells Farm, Station Road, Welham Green**

This site (7.5 hectares) is on the south-western edge of Welham Green, and comprises the Potterells Farm complex and adjacent agricultural land. Its estimated capacity is 140 dwellings. The site was previously promoted in 2015, and reviewed in the HELAA 2016. It was not allocated in the Submission local Plan. In support of the 2015 promotion, a Master Plan Vision for the site was prepared by Terence O'Rourke Limited on behalf of the Burns 2000 Settlement and the Potterells Farm Trust. The Society objected to the release of the site. Nothing has changed - a summary of the Society's views is set out below.

In landscape terms, this is a very open site, where housing development would seriously compromise the character of the Green Belt and the surrounding countryside. There are long views across open countryside from the west, and from Station Road there are wide open views, some three miles distant, towards South Mymms and Borehamwood, with no man-made structures in sight. The draft Master Plan proposed "structure planting" but this could not fully conceal development, the presence of which would be emphasised by street lighting. The openness of the Green belt would be severely compromised by housing development.

The main access to the site would be from Station Road, on a dangerous bend where traffic is tending to move at higher speeds at the southern approach to the village. A Transport and Accessibility Assessment, prepared in 2015 by Vectos, seriously under-estimated traffic flows at this point.

The Terence O'Rourke report acknowledged the geological and environmental importance of the Water End Swallow Holes SSSI, to the south-west of the site. It failed, however, to recognise the proximity of the Potterells site to the SSSI and the potential impact upon it. It also failed properly to show how the impacts of the regular flooding in Station Road could be mitigated. The Swallow Holes SSSI covers an area of 11.3 hectares. It is not limited to Water End, but extends westwards to Station Road. The proposed development boundary shown in the O'Rourke report was just 100 metres of the north of the stream which forms part of the SSSI, and the land shown as WeG15 falls steadily towards it. The additional surface water run-off from development could significantly damage the quality of this water course and the SSSI. Even with a holding point, it will probably exacerbate the flooding which occurs in Station Road, often causing its closure to traffic.

The Society believes that the hydrology of the SSSI must be protected from development. Coupled with other developments, building on the Potterells Farm site could materially affect both the hydrology of the SSSI and water quality over a far wider area.

It would appear that the proposed Green Belt boundary of the site, as shown on the map, follows the line of a footpath which runs across open farmland. This line is not marked by any recognisable features and is re-defined by ploughing at each season. As such, the footpath fails to provide a defensible boundary to the Green Belt.

In the Stage 3 Green Belt Study, the site is part of assessment parcel P64, to the south of Welham Green. An assessment of the site, together with sites Weg1, WeG2, and WeG3 and the Station Road allotments as sub-parcel P64e, gave a harm rating of “moderate – high”. An assessment of parcel P64, together with P63 to the west, gave a rating of “high”. In the Society’s view, this gives a much more truthful picture of the harm which the development would cause to the openness of the Green Belt to the south and west of Welham Green.

### **Site WeG17 Land South of Dixons Hill Road, Welham Green**

The site (2.1 hectares) is promoted for a 2FE primary school. In the eyes of many of the promoters and prospective developers of sites at Welham Green, the provision of a new primary school would overcome a major infrastructure constraint to housing development in the village.

This argument, however, fails to take account of the potential harm which development of this prominent site would do the Green Belt to the west of Welham Green. The site is currently in agricultural use for the cultivation of arable crops, and is open in character. It lies beyond the well-defined village boundary.

The Society also considers that the site would be totally unsuitable for a 2FE school, because of the high volumes of traffic using Dixons Hill Road, particularly at peak times. The increased amount of family traffic associated with the movement of 420 pupils would clearly exacerbate the problems which already exist.

In the Stage 3 Green Belt Study, the site is part of assessment parcel P63. The assessment of potential harm is "high", which is supported by the Society. In other places, the importance of the tract of countryside to the west of Welham Green has been highlighted – its protection is of paramount importance.

**Site WeG19 Land to the Side of “Cravenia”, Great North Road, Welham Green**

The site (0.6 hectares) is on the western side of the Great North Road (A1000). It is currently used as pasture, and is adjacent to “Cravenia”, a residential property. The housing capacity is unspecified, but would the site would probably yield up to 15 - 18 dwellings.

In the Submission Local Plan, the site was within the Marshmoor Policy Area (policy SP23), which has been allocated for a science and technology park. The Society has objected to the exclusion of the whole of this area from the Green Belt (see previous comments on sites WeG4a and WeG4b). In the Stage 3 Green Belt Study, the whole site was assessed as parcel P57. The harm rating for the parcel was “moderate – low”, a conclusion which is rejected by the Society. The presence of a caravan park and some residential properties does not diminish the importance of this tract of countryside and its contribution to the Green Belt to the south of Hatfield.

**Site WeG20 St. Mary's Church Primary School, 91 Dellsome Lane, Welham Green**

The site (0.97 hectares) is currently occupied by the school buildings and the playing fields to the west. The estimated capacity is 20 dwellings. The proposal is coupled to the promotion of an alternative site for the construction of a 2FE school to the south of Dixons Hill Road (WeG17).

The Society objects to the overall proposal, particularly on the impact of the development on the Green Belt of site WeG17. There is space for the expansion of the existing school. The use of the playing field for housing would encroach on the Green Belt and the setting of the Bush Wood Local Wildlife Site.

In the Stage 3 Green Belt Study, the site is shown as part of assessment parcel P61, where the harm rating is stated as "moderate – high". There is a separate assessment for the school site, however, as sub-parcel P61a, with a rating of "moderate – low". This fails to take account of the bigger picture and the importance of the contribution of the area west of Welham Green to the integrity of the Green Belt.

## Promoted Sites: Swanley Bar

### Sites SB1, SB1a, and SB1b: Land south of Swanley Bar Lane, Swanley Bar

The land has been promoted in the three parcels. The whole site (SB1) is currently used as grazing land for horses and extends to 7.8 hectares, with an estimated capacity of up to 100 dwellings. Two smaller areas are promoted, which are sub-components of SB1. Site SB1a has an area of 2.57 hectares, with a capacity of up to 60 dwellings: site SB1b extends to 1 hectare, with an estimated capacity of 30 dwellings.

The whole area (SB1) was previously assessed in the HELA 2016, when it was referenced as site LHe3. In its earlier response to the Borough Council, made in February 2016, the Society commented that the site would make a considerable addition to the existing housing area at Swanley Bar. These views have not changed. Any development would have a serious impact on the openness of the Green Belt in this location, and would contribute to the closure of the landscape gap between Little Heath and Brookmans Park. Should development occur on any part of this site, it would threaten the survival of the Green Belt in the triangle of land contained by Hawkshead Road, Swanley Bar Lane, and the Great North Road.

There is an existing access to the land from Swanley Bar Lane, but the carriageway is narrow at this point, exacerbated by problems of on-street parking. The lane is a popular short-cut for traffic between Hawkshead Road and the A1000. The junction between Swanley Bar Lane and the A1000 is dangerous, with poor sight lines to the south.

In terms of sustainability, the sites are remote from any shops or public facilities. The nearest centres are Potters Bar and Brookmans Park, both over a mile away. Most movements would of necessity be by car, on already congested roads.

The Society concluded that this would not be a suitable site for housing and should not be released from the Green Belt. Development would have a seriously detrimental effect on the openness and character of the Green Belt in this part of the Borough. The Ray Brook Valley, to the north of the site, is at the centre of a significant tract of open countryside, breached only by a line of houses along the A1000. This area also contains the Grade II\* Folly Arch and the Grade II listed Gobions Gardens.

In the Stage 3 Green Belt Study, the whole area is within assessment parcel P80. The harm assessment rating is high, which reflects the Society's comments set out above. These views are applicable to the whole site and its components.

**Site SB2: Land at Swanley Bar Lane/ Great North Road, Swanley Bar**

This is a new site (1.75 hectares), with an estimated capacity of 27 dwellings. Its current use is stated as “a disused sewage works and other ad hoc structures”. It has previously been promoted to the Borough Council’s brown field register.

The site is bounded to the north by Swanley Bar Lane and to the east by the Great North Road (A1000). The southern and western boundaries are defined by hedgerows. In the Society’s view, there are no special circumstances which would justify its release from the Green Belt. The impact on the Green Belt would be significant (see SB1 above).

In the Stage 3 Green Belt Study, the site was also part of assessment parcel P80, where the harm rating was “high”. As with site SB1, this clearly reflects the Society’s views on the sensitivity of this site.

**Site SB3: 104 Hawkshead Road, Little Heath**

This is a proposed back land development to the rear of the existing house at 104 Hawkshead Road. It is small in size (0.23 hectares) and would produce only 7 – 9 dwellings. This is a purely speculative proposal and would be more appropriately dealt with under development management procedures. There are no special circumstances which would justify its release from the Green Belt.

## **Promoted Sites: Little Heath**

### **Site LHe3: Land south of Hawkshead Road, Little Heath**

This has been promoted as an extension to a larger site, previously referenced as BrP7, which was allocated in the draft Local Plan 2016 as housing site HS24. The total area would be 4.88 hectares, with an estimated capacity of 108 – 123 dwellings.

The original site BrP7 was promoted by AECOM consultants on behalf of the owners, the Royal Veterinary College (RVC), and submitted to the Borough Council in January 2015. Comments on the proposal were made by the Society and the Little Heath Action Group in March 2016. There have also been a large number of other objections to its inclusion in the Submission Local Plan as housing site HS24. Since then, nothing has changed – the proposed extension to the site would have a far greater impact on the Green Belt and would be unsustainable.

The site as a whole is an elevated, highly visible area, and the most prominent component would be the extension LHe3. From the site, there are long views to the surrounding countryside, particularly to the north-west.

The current use is agriculture (ALC grade 3) and the area is actively used for the grazing of cattle and sheep associated with the RVC. In landscape terms, development of this site would impinge on the integrity of the Ray Brook Valley to the north and the tract of countryside running to the south of Brookmans Park. This includes the Gobions Park Grade II listed gardens. Together with other sites, development of the area would result in the virtual coalescence of the gap between Potters Bar/Little Heath and Brookmans Park.

The proposed site is in an unsustainable location, and is not within walking distance of the two shopping centres of Potters Bar, or Brookmans Park. Local facilities and employment are non-existent in Little Heath, and most journeys would need to be made by car. There would be considerable pressures on the local road system, including the A1000 to the east.

In the Stage 3 Green Belt Study, the site is located within assessment parcel P78. The harm rating for the whole parcel is “very high”, and the rating for sub-parcel P78b (including BrP7) is stated as “high”. This substantiates the points made by the Society about the sensitivity of the site (including LHe3). Development here would be of significant harm to the gap between Potters Bar and Hatfield, as well as to the local gap between Little Heath and Brookmans Park.

**Site LHe4: Studlands, Hawkshead Road, Little Heath**

This small site (0.49 hectares) is to the rear of Studlands, an existing residential property on the north side of Hawkshead Road. The estimated capacity is 7 – 9 dwellings, and the existing house would be retained. Access would be from Hawkshead Road.

This appears to be a speculative proposal, prompted by the call for sites. It would not contribute a great deal to the Borough's housing needs, and the case would better be determined under development management. No special circumstances have been demonstrated to justify the release of this site from the Green Belt.

### **Site LHe5: Videne, Hawkshead Road, Little Heath**

The site (2.09 hectares) is on the north side of Hawkshead Road. Its current use is stated as residential, and it would appear to be linked to the ownership of Videne, which is located in the south east corner of the area. The bulk of the site is open in nature, and it occupies a distinct gap between properties on the north side of the road.

There is no estimate of capacity, but there would appear to be sufficient for at least 30 dwellings on the site. This would clearly have a detrimental effect on the openness of the Green Belt in Little Heath. Traffic generated by the proposed development would cause additional pressures on Hawkshead Road.

In the Stage 3 Green Belt Study, the site lies within assessment parcel P80, which has a harm rating of “high”. It was also assessed as sub-parcel P79/P80a, which included Little Heath and Swanley Bar, where the rating was “moderate”. This conclusion, however, was based on the assumption that Swanley Bay would be inset from the Green Belt, to which strong objections have been raised.

## Promoted Sites: Rural South

### Site RS3: Land north of Queenswood School, Shepherds Way, Brookmans Park

This large site (13.57 hectares) is located in open countryside to the north of Shepherds Way., with an estimated capacity of 300 dwellings. The main use is agricultural, with some outdoor leisure uses. In landscape terms, it is distinctly rural, with well-established hedgerow boundaries. There are two Local Wildlife Sites to the west of the area. To the north east there is the Great Wood SSSI.

As with promoted site BrP32, development of this site would result on significant encroachment on the open countryside. With 300 dwellings, the traffic generated on this site would cause severe problems on Shepherds Way, especially to the east where there are sharp bends in the road. To the west, there is already congestion at the junction between Shepherds Way and the Great North Road, which is controlled by traffic lights.

In the Stage 3 Green belt Study, the site is within assessment parcel P75, where the harm rating is “high”. It is clear that this is associated with the “significant” encroachment on the open countryside to the east of the Great North Road.

**Site RS4: Land at Ramsey Close, Brookmans Park**

This small site (0.52 hectares) is part of a residential property at Ramsey Close. Its estimated capacity is 10 dwellings. No special circumstances have been demonstrated to justify the release of the area from the Green Belt.

This would appear to be a speculative proposal, prompted by the Borough Council's new call for sites. With a limited capacity, it would contribute little to the Local Plan housing requirements. The case would more appropriately be handled by the development management process.

**Site RS5: North Mymms Water Treatment Site, Warrengate Road, Brookmans Park**

The water treatment site (2.17 hectares) is located in open countryside to the east of Warrengate Road. It is promoted as an employment use, but the nature of the employment is not specified. The Society is aware that there have been recent proposals to improve the works, so that any intensification of activities on the site would have a harmful effect on the Green Belt. No special circumstances have been advanced to justify additional employment on the site. Its further development should therefore be rejected.

## Promoted Sites: Hatfield South

### Sites Hat20 and Hat21: Land at Angerland Common

These two proposals are linked, in that they are promoted by the University of Hertfordshire. Site Hat21 (5.0 hectares) is currently used as a surface level park-and-ride facility for the university. The proposal is to construct a multi-storey car park, to enable further development to take place on the campus. To the south, at site Hat20 (8.4 hectares), a flexible range of development is proposed, with links to the university. It would include additional surface level car parking, and possibly a bus depot.

The Society would object most strongly to any further development in this important Green Belt gap between the south of Hatfield and Welham Green. The existing surface car park was permitted as an exception to Green Belt policy, to ease parking pressures on the university campus. Special circumstances were demonstrated in that case. That permission, however, did not assume that there would be any further incursion into the Green Belt. Clearly, the construction of a multi-storey car park alone on Hat21 would cause considerable harm to the openness of the Green Belt in this location. There is no possible case for the release of the land on Hat20.

In the Stage 3 Green Belt Study, the sites are included in assessment parcel P55, where the harm rating was “high”. The park-and-ride site was also assessed as sub-parcel P55a, assuming its release in isolation or in combination with the Lawn Cemetery and the P56a area to the east. Here the harm rating was “moderate – high”, reflecting the urbanising influences of the car park and the cemetery. The Society has also noted the recent planning application (Reference 6/2019/1208MAJ) for a crematorium in association with the cemetery.

Despite these developments over the years, the area remains in the Green Belt and retains an open aspect. The A1001 is a very strong boundary between the southern edge of Hatfield and the countryside beyond and should not be breached. The Society has consistently maintained its opposition to development to the south of the town, including site Hat11, which has been allocated for housing in the Local Plan.

