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## **Draft Hertsmere Local Plan September 2021 Planning for Growth – Regulation 18**

### **Comments from the North Mymms District Green Belt Society**

The North Mymms District Green Belt Society (NMDGBS) is a voluntary society, with currently around 700 members, which has been working for the preservation of the Green Belt and the amenities of the Parish of North Mymms and surrounding district since 1971.

#### **1. General Comments.**

- North Mymms is bordered by Hertsmere to the south and west. Accordingly, our concerns are mainly regarding the site at Potters Bar golf course (site PB2) and the proposed development of a new settlement at Bowmans Cross (site NS1). Nevertheless, we do have some general observations about the draft plan's overall approach and lack of important detail.
- Given the recognition that 79% of the Borough is in the Metropolitan Green Belt it is surprising that there is no strategic overview of the impact of the Green Belt and of impact of the restrictions set out in Chapter 13 of the NPPF. The proposed developments will make significant inroads into Green Belt within the Borough. They are by definition "inappropriate" and contrary to one or more of the five purposes of the Green Belt set out in NPPF paragraph 134. In fact, they will be very damaging for the local countryside. In the circumstances it is impossible to see how the Draft's "strategic objective" (page 12) set out with nineteen others, all of equal weight to: "*Protect the green belt against inappropriate or unplanned development*" can be realised.

- The assertion on page 11 that: *“The strategic green belt will be protected, the close relationship of urban and rural communities with surrounding countryside safeguarded and improvements made to the countryside and biodiversity to offset the impact of development”* without a strategy to do so, serves to undermine the credibility of the document.
- There is inadequate consideration of the use of brownfield land or the opportunities that the Plan offers to regenerate older parts of the borough.
- Overall, it would appear that the Draft is development led and not concerned with the impact on the Green Belt within the borough. There appears to be an easy assumption that “exceptional circumstances” as required by NPPF paragraph 136, will be found to justify the proposals. It is disappointing that the Draft offers no details of what these might be and in the absence of such justification there is no basis for including the Green Belt allocations in the Draft.
- We believe that the Draft’s provision for 12,160 dwellings over the plan period is excessive. Whilst recognising that this has been established by the government’s “standard method” we think the council is wrong to regard it as mandatory. The provision should reflect the lack of available land because of need to protect the Green Belt. Furthermore, we believe that it would be more appropriate for the Draft to reflect the most recent (2018) ONS projections which would produce a much-reduced requirement of below 7,000 dwellings for the plan period.
- Whilst the council appears to have undertaken joint studies with five neighbouring local authorities, we are concerned about the apparent failure to engage with Welwyn/Hatfield. This is particularly important in respect of the impact of development in the Green Belt near local authority boundaries. We believe that local authorities should work together proactively to manage the Green Belt where it straddles their boundaries to ensure that the Green Belt is protected from the cumulative damage from developments from both sides.
- NMDGBS is a member of the CPRE Herts and endorses and supports the extensive comments which CPRE Herts has submitted in the consultation.

## **2. Bowmans Cross (Site NS1)**

- NMDGBS believes this site should not be included within the Draft for the reasons set out below.
- The precise delineation of this site is not clear from the map on page 23. However, it is clear:
  - a) that it is a large site in the middle of the Metropolitan Green Belt.

- b) that it is immediately adjacent to two other local authorities; and
  - c) that its eastern boundary is the western boundary of Welwyn Hatfield.
- Any development on this site would cause significant harm to the Green Belt. In Green Belt assessments undertaken in connection with preparing the Welwyn Hatfield Draft Local Plan the site was identified as a significant part of a Green Belt parcel that is performing strongly against NPPF para 134 c) preventing encroachment into the countryside, as well as making a significant contribution to purpose b) by preventing the merging of London Colney, Potters Bar and Shenley.
  - There are significant nature/wildlife sites in and adjacent to the proposed site which would be damaged by the development.
  - There is no Green Belt assessment in the Draft and no attempt to identify the “exceptional circumstances” required by the NPPF to release the site from the Green Belt. Accordingly, its inclusion in the Draft is unsound.
  - Development on this site would impact considerably on the transport, educational and other services in the area affecting the neighbouring local authorities, the county council and central government departments. Though the Draft refers to the need to collaborate with these and other bodies it offers no practical details of how this is to take place or assurance that the necessary planning decisions and funding will be forthcoming for matters that exceed the competence of the borough council. For these reasons alone it is wholly inappropriate to include this development within the Draft.
  - There is no evidence in the Draft that the council has attempted to fulfil its duty to cooperate with neighbouring authorities as required by paras 24 – 27 of the NPPF.

### **3. Potters Bar Golf Course (Site PB2)**

- Though the extent of the site is not clearly delineated on the map on page 23 we note that it is identified for the development of 500 dwellings. Our concern is at narrowing the fragile gap between Potters Bar and Brookmans Park. This concern has been heavily debated in the examination of the Welwyn Hatfield Draft Local Plan that is still under consideration. We would urge the Council to discuss the management of this element of the Green Belt with Welwyn Hatfield Council in the context of the duty to cooperate.
- The southern boundary of Welwyn/Hatfield includes part of Little Heath, and the Little Heath Action Group (LHAG) is associated with the NMDGBS. The LHAG has

submitted a detailed objection to the proposal to develop Site PB (2) which the NMDGBS endorses and supports.

- Generally, we are concerned at the encroachment into gap between Potters Bar and Brookmans Park that has been happening along Swanland Road with the solar farm. We have concerns that the proposed extension of the Cranborne Road Employment Area will continue this trend. We would urge the Council to discuss the management of this element of the Green Belt with Welwyn Hatfield Council in the context of the duty to cooperate.

N. Matthews,

Chairman NMDGBS. 6<sup>th</sup> December 2021