

North Mymms District Green Belt Society

26th March 2026

Response to Regulation 18 Consultation Document for the Welwyn Hatfield Local Plan.

Summary

The North Mymms District Green Belt Society strongly objects to key elements of the Draft Local Plan. If implemented as drafted, the Plan would have a devastating impact on the Parish of North Mymms, delivering approximately 2,376 new homes — a 66% increase on the existing housing stock of around 3,600 dwellings. This scale of development would overwhelm already stretched infrastructure, subject residents to years of construction disruption, and cause irreversible harm to the Green Belt and rural character of the area.

The Society has engaged actively in previous Local Plan consultations and examinations. We note with regret that many earlier representations appear to have had limited influence, largely due to central government policy pressures. The public is growing weary of lengthy consultations when responses seem ignored.

We urge the Council to address the fundamental weaknesses in the Draft before progressing to Regulation 19. In particular, the Plan must:-

- Treat the Green Belt as a positive asset for the Borough, not merely a constraint to be overcome.
- Prioritise brownfield and urban regeneration sites across the borough first.
- Produce a comprehensive, infrastructure delivery plan for public consultation.

1. Aspirations for the Borough

We aspire for Welwyn Hatfield to remain a pleasant, well-functioning place to live — two towns surrounded by attractive Hertfordshire countryside, conveniently close to London. Continuous large-scale expansion on Green Belt land makes this impossible.

The Borough is an artificial construct of urban areas set within a predominantly rural landscape. The Metropolitan Green Belt (still covering approximately 76–79% of the Borough) is the “glue” that maintains community identity, supports health and wellbeing, and provides climate resilience. It should be celebrated as a positive strategic asset in the Plan’s vision, not treated as an awkward constraint or undermined by the introduction of “grey belt” designations.

Without a positive policy to safeguard and enhance the Green Belt, the Borough risks becoming a continuous built-up corridor from Potters Bar to Stevenage, effectively merging into Greater London. The Plan should include explicit strategic objectives to protect the openness of the countryside, promote public access, support agriculture, and enhance biodiversity and recreation.

2. Sustainable Development and Spatial Strategy Housing Requirements (SP1, SP11)

We understand the convenience of the spatial strategy and settlement hierarchy and agree that the small Green Belt settlements should be in the lowest tier 5 category however, we do not agree that it is appropriate for Brookmans Park and Welham Green to be described as Urban areas. They simply do not meet the OED definition '*Relating to, situated or occurring in, or characteristic of, a town or city as opposed to the countryside*'. Characterising these villages as Urban ignores their semi rural characteristics.

Nor do we agree with the treatment of Little Heath as a large village which appears to have been done merely to facilitate the inclusion of sites HEL5 and HEL7. Developing these sites would seriously reduce the separation of Potters Bar from Brookmans Park.

The Draft continues the unsustainable approach of the adopted 2023 Local Plan by proposing massive Green Belt release in North Mymms Parish.

We do not accept the standard method for calculating housing needs as appropriate for this Borough. It produces grossly excessive theoretical figures that are not sustainable locally.

We reject the assumption that Green Belt land is an inexhaustible supply. Once lost, its functions are gone forever. New development must be genuinely Plan-led, not driven by landowner "Call for Sites" submissions.

3. Green Belt (SP5 and related policies)

Over 70% of the Borough lies within the Green Belt, and virtually all open countryside is designated as such. The Plan fails to recognise or celebrate this as a defining positive attribute that underpins quality of life, health, and the rural setting of the settlements.

The Plan should include a positive policy to safeguard the Green Belt and actively enhance its contribution to recreation, mental health, climate resilience, and agriculture. Unacceptable that protection of the Green Belt is not listed as a specific strategic objective. The plan should also emphasise the importance of developments on Brownfield sites as a first priority.

The Council's own 2025 Brownfield Land Register identifies capacity for 4,324 homes on previously developed land borough-wide. Yet the Draft appears to ignore or sideline this potential without any published reconciliation against proposed Green Belt allocations. This contravenes national policy (NPPF paragraphs 124–125) on effective use of land and

brownfield priority. We request immediate publication of a full reconciliation table showing which brownfield sites have been included, assessed, or excluded and why.

We oppose any employment development on Green Belt land (SP14), including the apparent enlargement at HEL88/transmitter site, which would create unacceptable traffic issues on the A1000.

4. Infrastructure and Cumulative Impact (particularly sewage, flooding, roads, schools and medical services)

The plan's objectives include the intention to 'ensure the timely delivery of infrastructure needed for new and existing communities. In SP24 there is the commitment to ensure that *'suitable provision is made for new or improved infrastructure'*. Unfortunately there is no plan included in the consultation document, merely a stated intention that one is being developed. It is essential that this infrastructure delivery plan is published for consultation as soon as possible and before adoption of the Regulation 19 draft.

Infrastructure improvement and development cannot simply be considered on a site by site basis. The proposed development in North Mymms has to be assessed cumulatively and the impact on infrastructure requirements planned accordingly and implemented before the development begins. Such consideration should include an assessment of the impact on the local community of the disturbance caused by the construction for a period of ten to fifteen years

North Mymms presents significant infrastructure issues beyond the obvious ones of medical and education provision.

Sewage and Flood Risk (DMP10)

North Mymms sits on a chalk aquifer with historically high groundwater levels that rise with rainfall, causing regular flooding (particularly in winter). The area has 53 historic wells, reflecting its geology. Despite being in the South East, it is classified as severely water-stressed.

Thames Water has repeatedly indicated that treatment works in the region lack sufficient capacity for major new development. Recent issues include:

- Sewage contamination in roadside ditches (e.g., Bulls Lane near Thunderbridge Yard).
- Overloaded infrastructure and warnings of inadequate capacity for sites near Dixons Hill Road.
- Pollution of the River Colne from sewage discharges.
- Surface water and groundwater flooding at Dellsome Lane, Travellers Lane, Station Road/medical centre, and elsewhere.
- "Dry spills" from aging infrastructure, even in dry weather.

- Groundwater ingress during heavy rain overwhelming the network.

AMP8 upgrades (2025–2030) are welcome but appear insufficient for the proposed growth. Grampian conditions preventing occupation of new homes until necessary upgrades are completed must be mandatory. The Parish Council has rightly highlighted the need for wastewater infrastructure to be improved in parallel with housing.

Traffic

The draft plans contains no consideration about the overall impact of traffic in North Mymms. The potential developments both in the current and new plan will create much additional traffic. A full assessment is required covering the full impact of development in North Mymms and also the traffic consequences of development in adjacent parishes which contribute to through traffic. Amongst the roads affected are Dixons Hill Road, Bradmore Lane, Station Road and the A1000.

5. Agriculture and Natural Environment (Chapter 11, DMP56)

The Plan underplays the importance of agriculture. A substantial proportion of the Borough (roughly 40–50%, or 5,000–6,500 hectares) is actively farmed arable land. This supports employment and countryside management and should have its own dedicated section. The Green corridor proposal is welcome but must not detract from protection and enjoyment of the wider countryside.

The historic environment (Chapter 10, DMP50) is also undervalued. North Mymms has deep historical significance stretching back to Domesday, with 45 listed sites and ancient landscape features that contribute unobtrusively to the area's character.

The extent of the proposed development in North Mymms will severely impact the area's historic character.

6. Site Allocations and Reasonable Alternatives

The totality of proposed allocations in the Parish would be overwhelming.

In our view, no site can be allocated without full consideration of the collective impact of all the other sites chosen.

We do not support any of the allocated sites in North Mymms which are within the Green Belt on the grounds of over development within the Parish and the pressure on local infrastructure. This in addition to objections based on the fundamental Green Belt purpose of preventing urban sprawl by keeping land permanently open.;

We do not understand why sites in Tier 5 locations within North Mymms should have been included within the Schedule of Reasonable Alternative Sites. The consultation document itself states that Tier 5 locations are “*not considered sustainable for significant growth*”.and on

that basis Sites HEL37 HEL39 and HEL80, in Bell Bar, and HEL80 and HEL 28 should not be considered.

7. Conclusion and Requests

The Draft Local Plan is not positively prepared, justified, or effective. It fails to prioritise brownfield land, lacks exceptional circumstances for the scale of Green Belt release (including grey belt), treats the countryside as a constraint rather than an asset, and provides no credible cumulative infrastructure strategy.

We therefore request that the Council:

1. Immediately publishes a reconciliation between the 2025 Brownfield Land Register (4,324-home capacity) and the Draft allocations, with clear reasons for any exclusions.
2. Commissions and publishes a full cumulative infrastructure assessment (transport, wastewater, healthcare, education, flooding, sewage) with binding delivery timetables and mandatory Grampian conditions before Regulation 19.
3. Revises the spatial strategy to exhaust all brownfield and urban regeneration opportunities before any further Green Belt release in North Mymms Parish.
4. Reduces the housing target in North Mymms to a level consistent with natural population growth and sustainable infrastructure capacity.
5. Includes positive policies that celebrate and safeguard the Green Belt, agriculture, and the rural character of the Borough as core strategic objectives.
6. Ensures the separate Infrastructure Delivery Plan is completed and consulted upon prior to Regulation 19.
7. We would welcome the opportunity to meet with Council officers as the public engagement continues.