Town Planning Consultancy

2nd November 2026

Dear Welwyn Hatfield Council,

North Mymms District Green Belt Society Representation to R19 Welwyn Hatfield Local Plan Consultation

Please find below representations made on behalf of the North Mymms District Green Belt Society (The Society), a community of 998 members with an interest in the parish of North Mymms. (www.greenbeltsociety.org.uk). Representations to the Regulation 19 local plan have been authorized by the Society's committee, they have also been made on the Council's planning portal.

SP2: Spatial Strategy and Settlement Hierarchy
Point 1
The 2024 NPPF, paragraph 9 states 'Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.'
The local plan spatial strategy aims to *'Protect the borough's rural character and Green Belt by ensuring development is proportionate to the role and function of each settlement* '(page 28).
The North Mymms parish area comprises a largely open, rural area with interspersed villages and hamlets, located in the London green belt. Much of the area is of historic importance with registered parks and gardens, manorial estates and listed buildings. Settlements here comprise two larger villages (Brookman's Park and Welham Green) and several small villages, and hamlets.
The parish has or will see a considerable amount of development as a result of adoption of the 2023 local plan. The allocated housing sites include some which were removed from the green belt. Land at WEG1 has also been removed for employment purposes. The adopted plan allocated 871 dwellings and 40,500m2 employment space in the parish area.
The green belt and local character of the parish area has been and continues to be under significant threat. There are only circa 3600 dwellings in the area currently. With the cumulative impact of an additional 1153 proposed dwellings and further employment areas (141,300m2) proposed in the R19 plan, this will change the character and appearance of the settlements, the parish, the green belt and wider district area, forever.
Within the R19 local plan, the green belt and its historical purpose is not being given the importance and reverence which is due. Local authorities are enabled by the NPPF to consider the area's innate character and constraints when thinking about the

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appropriate amount of development for a local plan. The amount of development proposed is not considered proportionate to the scale, role and function of the settlements. The existing dwellings (3600) plus 871 provided for in the adopted local and an additional 1153 homes will increase the overall dwelling number in the area by 56% above the current amount. This is excessive and disproportionate for an area of green belt characterized by villages and hamlets.

The Local plan is therefore Not Sound– not consistent with national policy, positively prepared or justified. The spatial strategy should be reviewed again with view to reducing the impact upon the borough's green belt character.

SP2: Spatial Strategy and Settlement Hierarchy
Point 2

Green Belt policy is set out in Chapter 13 of the NPPF (Dec 2024; para 142). The Government attaches great importance to Green Belts, and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.
The spatial pattern of the proposed developments will create an almost continuously built-up appearance from the M25 in the south, heading northwards through the borough towards Stevenage. The desire to protect openness, prevent merging of settlements and 'ribbon' development were some of the reasons the green belt was identified as a key planning tool in the first place. In Hertfordshire the need for new settlements was responded to by creating garden cities and new towns to add to the existing market towns and small villages. The proposed pattern of development set out in the local plan therefore erodes the objectives which were laid down and protected by green belt policy established in the mid-twentieth century.
The local plan fails to assess the strategic impact on the countryside and green belt since it does not consider the cumulative impact on the green belt from development in neighbouring boroughs. One such example is the Potters Bar Golf Course to the south, in Hertsmere borough. Also, the proposal for a new settlement to be built at Bowmans Green of at least 5,000 new dwellings which will border the parish boundary. A shuttle bus to Potters Bar station is proposed, which will undoubtedly exacerbate the existing traffic issues in Welham Green and Brookmans Park at certain times.

Local authorities are enabled by the NPPF to consider the area's innate character and constraints when thinking about the appropriate amount of development for a local plan. The amount of development proposed is not considered proportionate to the scale, role and function of the settlements. The Local plan is therefore Not Sound– not consistent with national policy, not positively prepared or justified. The spatial strategy should be reviewed again with view to reducing the impact upon the borough's green belt character.

SP2: Spatial Strategy and Settlement Hierarchy
Point 3

NPPF, 2024 para 9 states 'Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.'
The spatial strategy aims to *'Protect the borough's rural character and Green Belt by ensuring development is proportionate to the role and function of each settlement* '(page 28).
The proposed housing strategy identifies supply from 1,132 dwellings with planning permission or commitments, 1,305 dwellings from windfall development, and 5,766 dwellings from existing allocations carried forward. The housing requirement identifies a shortfall against the need for 11,168 dwellings of 2,348 dwellings, which, it maintains, can only be met with Green Belt release.
Effectively therefore 49% of the dwellings within the wider green belt release are being found within North Mymms parish. As there are 8 parishes in the Borough, how can this possibly be justified?
Within the parish, only 7 homes of a total 1153 new units will be in a settlement and all but one of the proposed housing sites in the North Mymms Parish are located in the green belt.
This is a disproportionate amount of development for this area, both in terms of the amount of dwellings being found and in the loss of green belt being proposed.

Local authorities are enabled by the NPPF to consider the area's innate character and constraints when thinking about the appropriate amount of development for a local plan. The amount of development proposed is not considered proportionate to the scale, role and function of the settlements. The Local plan is therefore Not Sound– not consistent with national policy, not positively prepared or justified. The spatial strategy should be reviewed again with view to reducing the impact upon the borough's green belt character. The Council should look again at all brownfield and previously developed land options to check if they can be brought forward within the plan period and to support and pursue them as appropriate.

SP2: Spatial Strategy and Settlement Hierarchy
Point 4
Page 28 of the R19 Plan states *'The emerging spatial strategy aims to:*
• *Direct growth to locations with the greatest access to jobs, services, public transport and active travel networks.*
• *Reduce the need to travel and support a shift towards sustainable modes of transport.*
• *Strengthen the role of existing centres by focusing development where it can support local shops, services and community facilities.*
• *Make best use of existing infrastructure and planned investment.*
• *Protect the borough's rural character and Green Belt by ensuring development is proportionate to the role and function of each settlement.'*
The designation of Little Heath as a Tier 2 settlement conflicts with the spatial strategy and green belt objectives and is at odds with how other small villages are treated in the local plan.
Little Heath has limited local services comprising a pub, church and primary school but there are no shops nor a post office. Although located close to (and in some parts,

adjacent to) the larger settlement of Potters Bar, the Society consider this village should be recognised as a Tier 3/4 local village. Within such settlements only limited infill or small-scale development compatible with Green Belt policy should be considered appropriate. Viewing the village as an extension to Potters Bar, rather than a separate settlement within the green belt carries risk of reducing the perceived impact of proposed developments, losing its local character forever and potentially of inviting further development to the area in the future.
The proposed housing sites LH3 and LH4 are subsequently totally out of scale and character when associated with the village of Little Heath.
On this basis, site LH3 in particular is an incoherent inclusion, since not only will it have a significant impact on the green belt purposes, but it is also an unsustainable location, remote from services and public transport hubs.
Site LH4 importantly serves to retain the open gap between the settlements of Potters Bar and Little Heath.
The Society also considers the allocation of Site BRP4 to be incongruous, this field is part of Home Farm, which has a Bell Bar address. Although it may be located on the edge of the Brookmans Park village, it is considered to be part of Bell Bar which is a Tier 5 Village.
The character of the parish and villages will be altered forever by the change in use of these sites.
Local authorities are enabled by the NPPF to consider the area's innate character and constraints when thinking about the appropriate amount of development for a local plan. The amount of development proposed is not considered proportionate to the scale, role and function of the settlements. The Local plan is therefore Not Sound– not consistent with national policy, nor positively prepared or justified. The spatial strategy should be reviewed again with view to considering the classification of Little Heath and removing BRP4 from the list of allocations.

SP 5: The Green Belt And SP 11: Housing Requirements and Delivery (C) Site allocations for housing.

The Green Belt is a fundamental national and local planning policy tool designed to prevent urban sprawl, maintain openness, and preserve the character of historic towns. Its five core purposes are: checking unrestricted sprawl, preventing towns from merging, safeguarding the countryside, preserving historic town settings, and assisting urban regeneration. Traditionally, development on Green Belt land is considered inappropriate unless very special circumstances exist. Paragraph 145 of the NPPF 2024 states '' *Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.*''
Paragraph 148 of the NPPF states: '*Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns*

of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'

Paragraph 149 establishes when defining Green Belt boundaries, plans should amongst other things '*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

The 2024 NPPF introduces the concept of grey belt land, recognising that some Green Belt areas are of lower environmental or landscape quality. This allows more nuanced assessment of land that may be suitable for development while retaining protection for high-value Green Belt areas. The local plan does not identify grey belt within the borough.

The North Mymms parish area which covers the southernmost part of the borough in the London green belt, has a largely open, rural character with villages and hamlets. Settlements here comprise two larger villages (Brookman's Park and Welham Green) and several small villages, and hamlets.

Policy SP5 The Green Belt fails to describe the importance of protecting the green belt given its historical and ongoing contribution to the appearance, character and culture of the wider borough. The policy could be used to protect the green belt area from additional development, but the Council has not done so, thereby ignoring the desires of its residents.

The Council's evidence base includes assessment of the green belt sites and identifies that some are considered to contribute strongly towards the five purposes. A few of the proposed sites have been assessed as having a moderate impact in terms of their loss to the greenbelt; they are WEG5, WEG6 and part of BRP8. However, most of the sites proposed for development in the parish area contribute strongly to many of the green belt purposes; the impact upon them as outlined in the Green Belt Assessment is summarised below:

- BRP4-Development in the parcel would significantly increase the urbanising influence on adjacent open land. The parcel has weak hedgerow boundaries to the east, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land. Also, of note in 2022 a planning application (6/2022/1097) for residential and other uses was dismissed on appeal (Appeal Decision APP/C1950/W/22/3307844). The Inspector concluded that the proposals would cause significant harm to openness and have an adverse effect on the local character and appearance.
- BRP5- Development of land in the parcel would have an incongruous impact on the urban pattern. The lack of features to restrict and contain development mean that, although the parcel is subject to some urbanising influence, development here would have an incongruous impact and will increase the urbanising impact of development on adjacent open land.
- BRP6 - Development in the parcel would create an incongruous pattern of development by breaching strong physical features currently restricting and

containing an urban area and would likely have a minor impact on visual separation between towns.

- BRP7- Part of important parcel to south of settlement. Development of land in the parcel would likely significantly impact visual separation between towns. In addition to the loss of visual separating features the development of land in this parcel would also be likely to increase urbanising influence on remaining land in the gap. It would significantly increase the urbanising influence on adjacent open land
- LH3- Strong contribution to restricting sprawl. Development of land in the parcel would have an incongruous impact on the urban pattern and would likely have a minor impact on visual separation between towns.
- LH4- Strong contribution to restricting sprawl. There are no physical features in reasonable proximity strong enough to restrict and contain development. The parcel has a mix of open or hedgerow boundaries to the south and west, so development within it would increase the urbanising impact of development on adjacent open land. Development of land in the parcel would have an incongruous impact on the urban pattern. It would be likely to increase urbanising influence on adjacent land in the gap.

It is therefore contended that the impact upon the wider green belt from the cumulative and individual impact of the loss of proposed sites has not been fully recognised or evidenced. The Local plan is therefore Not Sound– not consistent with national policy, not positively prepared or justified. The plan should consider the impact of the quantum of development upon the green belt as a whole. Full consideration of the importance of the green belt and the impact of such significant loss has not been undertaken. Although development needs could be a reason, the consideration of whether this overrides the green belt is not evident. The matter should be reconsidered, grey belt should be identified, and key green belt sites should be protected.

SP 14: Designated Employment Areas and Floorspace

Policy SP14 states that the designated employment sites are safeguarded for '*Class E(g), B2 and B8 uses, and other employment generating activities including research and development, training facilities, creative industries, green technology, data centres and similar activities, where they are compatible with neighbouring uses and do not undermine the function of the area as a focus for employment or undermine other polices in this Plan.*

Historically, in the 2023 local plan, land at Marshmoor (WEG1) was allocated for employment purposes. In addition, there are two new and substantial employment sites to be allocated in the plan, which are located within the parish; the former New Barnfield secondary school (HAT8) and The Brookmans Park Transmitting Station (BR8).

New Barnfield (HAT8) comprises mainly previously developed land which has not been used for school in many years. Site BR8, at Brookmans Park comprises expansion of the existing transmitting station site, which is partly rural /agricultural in use and character. The Society opposes employment development on new greenfield Green Belt

land including the expansion of BRP8 on to rural and agricultural land. It accepts in principle the reuse of previously developed land at HAT8 and the continued employment use of the existing operation at BRP8 subject to the uses proposed being suitable for the location. This refines the position taken at R18 when the Society objected to employment development on Green Belt land generally, including the transmitter site.
Proposed uses should be carefully considered for their suitability at these locations. The Society is extremely concerned that a data centre might be proposed within the area. The Society has previously outlined concerns regarding the capacity of local infrastructure generally to deal with proposed new development. The employment section of the Infrastructure Development Plan (IDP) states that at Brookmans Park Transmitting Station an assumption of a 130,000 sqm data centre should be made. The IDP does not, however, specifically deal with the demands and stresses a data centre could place on utilities, primarily energy and water supplies.

The Local plan is therefore Not Sound– not consistent with national policy positively prepared or justified. To protect the community and environment the policy SP14 should specifically preclude data centres from the list of acceptable uses. Moreover, it should be made clear that from a development management perspective, data centres will be considered Sui Generis rather than B8 (or other) use so that potential impacts of the proposed use on the community, local infrastructure and services can be fully and properly assessed at planning application stage.

DMP 38: Data Centres
Paragraph 86 of the 2024 NPPF sets out that planning policies should identify suitable locations for datacentres.
Local Plan policy DMP 38 states: *A. Proposals for data centre development will be supported in designated employment areas, with priority given to sites that: a) have existing or planned high-capacity electricity and water infrastructure; and b) can demonstrate efficient and deliverable connections to utilities without requiring reinforcement that would unacceptably delay or constrain development elsewhere.*
This standalone policy is helpful to some extent since it identifies the issues which need to be tackled. Concerns have been expressed by the Society, particularly in relation to the negative impacts which are being reported and experienced by communities living close to data centres elsewhere.
A Water UK analysis of data centres has revealed they typically use around 6.6 million litres of water per day, equivalent to that used by 20,000 homes. Data centres are also becoming a major driver of electricity demand growth, with significant local impacts on grid stability, infrastructure investment, and consumer electricity prices. Such a proposal in the parish would put huge pressure on local utility services and quality of life.
The policy would be improved if the criteria used could be strengthened, so that potential impacts on the local community are given high priority and understood very early on in any proposed sites consideration.

We agree with a CPRE Hertfordshire report 'Data Centres' in April 2026 which concludes that the rationale put forward to justify building new data centres in the countryside in Hertfordshire is not compelling when considered against the alternatives. There are strong arguments which demonstrate that the countryside in Hertfordshire is not the right place for these large-scale industrial buildings, stating the issues with power, water supply, climate change, and their ability to destroy the landscape. This report can be found on CPRE Hertfordshire's website at https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2026/04/Data-Centres-April-2026-Final.pdf
In addition since the utility companies' responses to the Infrastructure Delivery Plan, appear not to have specifically considered the assumption of a data centre in the area, it is questionable whether such a use can be supported at this stage in planmaking.

The Local plan is therefore Not Sound– not consistent with national policy, positively prepared or justified. Although it is accepted that employment areas are likely the most suitable locations for data centres, it should not be assumed that such a use would be acceptable in them in principle. Moreover, to protect the community and environment, it should be made clear that from a development management perspective, data centres should be considered to be Sui Generis rather than B8 (or other) uses so that potential impacts of the proposed use on the community, local infrastructure and services can be fully and properly assessed at planning application stage.
Policy DMP38 E (b) requires that '*the demands of the development can be met without unacceptable impacts on existing or planned development'.* It would be helpful to establish what *'unacceptable'* means or to establish how this will be measured.

SP 24: Infrastructure Provision
Paragraph 20 of the NPPF 2024 indicates that local planning policies should make provision for infrastructure. Paragraph 35 states that '*Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.*
Local Plan Policy SP24(B) states *'The Council's Infrastructure Delivery Plan sets out the key infrastructure projects that will be required to deliver the objectives of the Local Plan."*
The following infrastructure matters are already a concern to the community and will be exacerbated as a result of proposed development and consequent population increase. The Society community is concerned that the full impact of the site allocations may not be mitigated effectively. Concerns are set out below:

1. Transport systems and traffic management. There is a lack of information in relation to known issues, such as access improvements to the railway station to enable people to reach it by various modes of travel.
2. Water supply – the parish is in a wider area of significant water stress. Many of the sites are in SPZ1 (groundwater protection zone) (Sites BRP4, BRP5, BRP7, WEG5, LH3, LH4) and as set out in the Sustainability Assessment, the risk from development to groundwater pollution is high. It is not clear how this amount of development can be accommodated and how the zone will be appropriately

protected. The potential requirements for data centres are not explored or dealt with.

3. Sewerage capacity is limited/inadequate, though it is noted that Thames Water proposes improvement to the local treatment works.
4. The responses from energy companies are vague in relation to whether sufficient gas and electricity will be available to serve the whole community i.e. *''Ongoing engagement with UK Power Networks is required to confirm local network capacity and identify any upgrade requirements. Further information will be provided through subsequent updates to the IDP.''* The potential requirements for data centres are not explored properly.
5. Surface water flooding is likely to be exacerbated. Some of the proposed sites are affected by surface water flooding and others by flood zones 2 and 3. In particular, Pooleys Lane and Bull Lane both flood in wet weather and is becoming more frequent with climate change. Other local roads, such as Bell Lane, flood in severe weather. The Environment Agency advises *''a need for new flood defences in the borough has not been identified. However, the provision of flood defences will be reviewed when taking forward the growth proposals set out in the council's Local Plan, and most sites promoted for development will be required to produce a Flood Risk Assessment as part of their planning application, and to provide sustainable drainage systems (SuDs) on site to reduce the risk of flooding. There is also the potential for new development to reduce existing flood risk to existing communities and built-up areas''*. This amounts to an unplanned and piecemeal reaction to growth.
6. The Society is extremely concerned that a data centre is proposed within the area. The employment section of the IDP states that at Brookmans Park Transmitting Station an assumption of a 130,000 sqm data centre should be made. The potentially significant wider impacts of the proposed use on local infrastructure and services, specifically water, drainage and electricity, should be assessed before a site is allocated. The infrastructure impacts should be made clear and dealt with within the IDP. This has not been undertaken across the relevant services in enough depth to determine whether a data centre can be accommodated in the area, in principle. Moreover, it is not clear whether the effects of datacentres being proposed in adjacent boroughs have been accounted for, such as that being proposed on the Potters Bar/South Mimms border (Hertsmere borough), which is only a few miles away from Brookmans Park.
7. The local plan does not review all the additional community facilities and services which could result from substantial additions to local villages, for instance the need to plan for local shops. One example is the village of Brookmans Park, originally built for commuters in the 1920s, which has limited services and facilities such as shops, and supermarkets, dentists etc. and is not well equipped to cater for an injection of 518 homes. Moreover, despite there being access to rail travel, it should be recognized that existing residents need cars to travel to larger towns to meet their daily needs. The quantum of

development proposed in the local plan is not a sustainable choice for North Mymms parish.

The Local plan is therefore Not Sound– not consistent with national policy positively prepared or justified. Insufficient research has been undertaken in relation to the suitability of the parish to accommodate this level of growth and the proposed infrastructure provisions are vague and unsatisfactory at this stage, providing inadequate comfort for the local community. Key infrastructure projects are not identified and thus the local plan is premature.

SP 22: Conserving and Enhancing the Natural Environment and Landscape Character and (DMP 57: Best and Most Versatile Agricultural Land)

Section 15 of the he NPPF indicates that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. Best and most versatile agricultural land is classed as land in grades 1, 2 and 3a of the Agricultural Land Classification.
Policy SP22 B 9D) d) seeks to '*Avoid the loss of the best and most versatile agricultural land*'
Policy DMP57 (B) states that '*Development of the best and most versatile land (ALC Grade 1-3a) will normally be refused, unless it can be robustly demonstrated that: a) No suitable alternative site of lower agricultural quality (Grades 3b–5 or brownfield land) is available within the plan area; and b) The proposed development meets an overriding need that cannot be met elsewhere; and c) The sustainability benefits of the proposal clearly outweigh the long term loss of BMV land.'*
Much of the land proposed for development in the North Mymms area is Grade 3 agricultural land. The Sustainability Assessment in the Council's evidence base is, however, often unsure about the precise quality classification of the agricultural land to be lost in the area. It goes further to suggest in some cases that loss of such will have a significant impact and/or should not be pursued further, for instance in relation to sites LH3 (Leggats Park) and BRP4 (Bradmore Way).
Policy DMP57 deals with future proposals rather than the existing proposed allocations. There is therefore substantial conflict between this and Policy SP22 in relation to the proposed allocations. In the context of SP22, land should not be promoted when its quality is unknown and/or significant impact has been identified.
Loss of good quality agricultural land may also have an impact on farm viability. It is not clear if this has been assessed in choosing rural sites.

The Local plan is therefore Not Sound– not consistent with national policy, positively prepared or justified. Before decisions are made in relation to some of these sites, clarity is urgently needed. And the sites where significant impact is identified should be removed from the allocations list.

Yours sincerely,

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