

Examination of the Welwyn Hatfield Local Plan 2023 – 2032

Regulation 19 (Submitted Sites)

Little Heath

Policy SADM 32, Site HS 24 (BrP7)

Land south of Hawkshead Road

Statement on behalf of CPRE Hertfordshire by

Jed Griffiths MA DipTP FRTPI

April 2020

Introduction

1. This statement has been prepared by the Campaign to Protect Rural England Hertfordshire (CPREH). It has been compiled in response to an invitation by the Examination Inspector to submit further material for consideration at Stage 8 of the hearing sessions. This statement addresses the matters, issues, and questions in respect of land at Little Heath. The land, to the south of Hawkshead Road, was allocated in the Draft Local Plan under Policy SADM 32, Site HS 24 (BrP7).
2. Earlier representations, objecting to the allocation of the site for housing, were submitted by CPREH at the Regulation 19 stage. Where appropriate reference will be made to this initial submission, and to representations made at previous hearing sessions. The purpose of this statement is to address the issues and questions raised by the Inspector in the schedule published on 17th March 2020.

Matter 1 – Environmental Considerations (Questions 123 – 138)

3. CPREH has no detailed comments to make on flood risk and drainage issues but has noted the responses made previously by the Little Heath Action Group and the North Mymms District Green Belt Society.
4. With regards to landscape considerations, CPREH has previously made reference to the elevated nature of this site, which rises from south to north. Its characteristics were described in the Landscape Sensitivity Assessment of July 2019 (EX156), where it was included in assessment area 54c, with a rating of “moderate” to “moderate/high”. CPREH agrees with this analysis. Development of the site, in this area of elevated land, would clearly have a severe effect on its landscape character.

Matter 2 – Infrastructure (Questions 139 – 148)

5. Other representors have made reference to infrastructure deficiencies relating to the development of the site. CPREH agrees with these views – the lack of adequate facilities and services has not been picked up in the sustainability appraisal. The proposed development on the site is totally out of scale with the small settlement of Little Heath, which currently maintains its separate identity from Potters Bar.

Matter 3 – Sustainability (Questions 99 and 100)

6. In terms of the availability of facilities and services, Little Heath is clearly dependent on Potters Bar, although it is physically separate. The two shopping centres in Potters Bar – High Street and Darkes Lane - are more than a mile away, beyond comfortable walking distance. There are no shops in Little Heath, and, apart from the primary school and one public house, no other services or facilities. The site is clearly not a sustainable location for development.

Matter 4 – Green Belt (Questions 156 – 166)

7. The Inspector has noted the results of the Stage 3 Green Belt Review (EX99A-E) with regards to Little Heath. In response to Questions 157 and 158, CPREH would draw attention to the fact that site HS24 was included in assessment parcel P78, which had a harm rating of “very high”. Release of the eastern part of the parcel, around HS 24, was assessed as sub-parcel P78b, and was given a harm rating of “high”. The whole parcel is also described as one of the “most essential” areas of Green Belt. These conclusions seem to reflect an earlier assessment in the Green Belt Study 2013 (GB/2), in which the Borough Council considered that the site made a “significant” contribution to the visual gaps between Little Heath, Brookmans Park, and Swanley Bar.
8. With regards to Question 161, CPREH notes that in the Green Gap Assessment report of July 2019 (EX160), site HS24 was included in the study area between Brookmans Park, Swanley Bar, and Little Heath. The part between Brookmans Park and Swanley Bar was recommended for designation as a Green Gap Policy Area, but CPREH considers that this should be extended to include the area adjacent to the urban edge of Potters Bar, including site HS 24. The Green Gap Policy Area also included site HS25 (Q156), to which CPREH also objected. CPREH believes that all of the land between Brookmans Park and Potters Bar should be retained in the Green Belt. It is critical because of the importance of maintaining the gaps between the string of settlements along the Great North Road between London and Stevenage.
9. Earlier in 2019, an extension to the site was promoted as site LHe3, but this was rejected by the Borough Council Cabinet in January 2020. At the same time, the Cabinet have included site HS 24 in the list of allocations which are recommended for removal from the Draft Local Plan. CPREH has given its full support to this recommendation and welcomes the formal proposals that the Borough Council intends to make for changes to the Draft Local Plan. CPREH also welcomes the Council’s recognition that development of this site would be particularly harmful to the Green Belt.
10. In addition to the detailed factors listed above, there is also the “in-principle” question of harm to the Green Belt, as set out in the National Planning Policy Framework 2012 (paragraphs 14 and 47). In paragraph 14, it states that plans should meet need, unless specific policies indicate development should be restrained (footnote 8 refers specifically to Green Belt land). In addition, paragraph 47 states that plans should meet need “insofar as this is consistent with the policies in the NPPF.” The latter is an important caveat, frequently overlooked by those promoting or supporting development in the Green Belt.

11. In summary, in response to Question 159, CPREH are clear that this site should not be allocated for housing in the Draft Local Plan. The allocation is neither justified, nor effective, nor consistent with national policy in the NPPF. Exceptional circumstances (Q160) do not exist for its release from the Green Belt.
12. In response to Question 161, it is clear that development of the site would impinge significantly on the gap between Potters Bar and Brookmans Park. CPREH's arguments are set out in paragraphs 7 and 8 above.
13. In response to Questions 163 – 165, the existing Green Belt boundary to site HS 24 is robust and defensible, as it clearly defines the urban edge of Potters Bar and prevents urban sprawl. The Stage 3 Green Belt Review refers to “the weak proposed new boundary to the west” and states that it should be pulled back. CPREH endorses this view – the proposed new boundary is much weaker than the existing line. It would impinge on the plateau area on the northern edge of the site. Any proposals for woodland planning in this position would detract from the open aspect of the site and its rural character. There is no better boundary than the existing line for the reasons set out above.

Matter 5 – Implementation (Question 167)

14. CPREH has no specific comments to make on this matter.

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Hertford

18th April 2020