

Examination of the Welwyn Hatfield Local Plan 2013 – 2032

Regulation 19 (submitted Sites)

Little Heath

Policy SADM 32, Site HS 24 (BrP7)

Land south of Hawkshead Road

Policy SADM 32, Site HS 25 (LHe1)

Land north of Hawkshead Road

Statement:

On Behalf of North Mymms District Green Belt Society

By Jed Griffiths MA DipTP FRTPI

April 2020

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the North Mymms District Green Belt Society. 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 two sites at Little Heath. The sites were allocated under Policy SADM 32 of the Draft Local Plan. Site HS24 (BrP7) is on land to the south of Hawkshead Road; Site HS25 (LHe1) concerns land to the north of Hawkshead Road,
2. Earlier representations, objecting to the allocations, were submitted by the Society at the Regulation 19 stage. Where appropriate reference will be made to the original statements of objections, and to representations at previous hearing sessions. The main purpose of this statement, however, is to address the issues and questions set out by the Inspector in the schedule published on 17th March 2020.

Matter 1 – Environmental Considerations (Questions 123 – 138)

3. The Royal Veterinary College, the owners and promoters of site HS 24, have admitted that surface water and flooding does occur on the site. The Society has previously provided photographs of extensive flooding at the lower part of the site. A flood risk assessment should be undertaken for both sites.
4. With regards to foul water drainage, Thames Water has previously indicated to the Borough Council that here would need to be significant upgrading to the sewerage system in this area. This would take several years, and there are no plans at present to do this.
5. The Society has referred to the elevated nature of Site HS24, which rises from south to north. In the Landscape Sensitivity Assessment (July 2019), the site was included in sub-area 54c, with a rating of “moderate” and “moderate/high”. The assessment clearly applies to the area to the west of Hawkshead Road, which includes the site. The description of the area shows that the site has a strong rural character, with fields currently used for the grazing of animals. Development of the site would impinge on the wider landscape to the north, which includes the Folly at Swanley Bar, the Gobions Wood wildlife site, and the Gobions Historic Park and Garden. These are prominent features in the gap between Little Heath and Brookmans Park and should be protected, both on landscape and Green Belt grounds.

Matter 2 – Infrastructure (Questions 139 – 148)

6. The Inspector has noted the significant concerns by representors concerning the provision of infrastructure. There are a number of issues which have been raised by the Society. With regards to education, detailed research has been undertaken by the Little Heath Action Group. This confirms that the Little Heath primary school is at capacity and requests for its expansion have been consistently rejected by the County Council. Many younger children have to travel to schools in Potters Bar. Additional places would be needed in local secondary schools, the nearest of which are in Hertsmere (Mount Grace and Dane Alice Owens). Extra capacity would be required in Potters Bar. Local capacities in education provision are likely to be challenged further in Potters Bar by the current review of the Hertsmere Local Plan, which has suggested a need for up to 2,000 new dwellings in and around the town.
7. There is no doctors' surgery in Little Heath, and residents currently use facilities in Potters Bar, which are at capacity. Additional facilities would need to be provided in Potters Bar.
8. Access to either or both of these sites would need to be provided from Hawkshead Road, probably by a roundabout. The road is already heavily used, especially at peak hours, and any new junction would cause problems of traffic congestion and road safety. It is questionable whether the viability of the proposed developments would be sufficient to fund highways improvements.

Matter 3 – Sustainability (Questions 149 – 155)

9. In terms of local geography, both sites would rely on Potters Bar, rather than other towns in Welwyn Hatfield Borough. There are distances of more than a mile between the sites and the two shopping centres in Potters Bar – at Darkes Lane and the High Street. The former is the principal centre and is located adjacent to the railway station (1.3 miles distant). Inevitably, residents of the sites would access these centres by car, rather than on foot or by cycle. Increased car usage would lead to pressures on an already congested road network, especially the A1000. There is limited capacity at the Potters Bar railway station. Public transport is poor – there is only one bus an hour between Brookmans Park and Potters Bar, which uses Hawkshead Road.

10. There are no local shops or other local amenities in Little Heath, apart from one public house, and very little local employment. The sites do not seem to have been assessed appropriately in the sustainability appraisal. Taking all the factors together, it is clear that the sites are not sustainable locations for development.

Matter 4 – Green Belt (Questions 156 – 166)

11. The Inspector has noted the conclusions of the Stage 3 Green Belt Review in respect of the two sites. In respect of site HS25, it was assessed as part of parcel P80, with a harm rating of “moderate”. It was also included in the assessment of Swanley Bar as a “washed over” settlement. Here, the impact of development which included Swanley Bar and the surrounding area, including HS25 was given a harm rating of “high”. This reflects the overall character of the area, which is largely open and which provides a distinctive gap between the main area of Little Heath and Swanley Bar. It is therefore entirely appropriate that it should continue to be designated as Green Belt.

12. With regards to site HS24, it was included in the Stage 3 Green Belt Review within assessment parcel P78, which had a harm rating of “very high”. Release of the eastern part of the parcel, including HS24, was assessed as sub-parcel P78b, with a harm rating of “high”. In the report it is described as one of the “most essential” areas of Green Belt. This reflects an earlier assessment in the 2013 Green Belt Study, where the Borough Council considered that the site made a “significant” contribution to the visual gaps between Little Heath, Brookmans Park, and Swanley Bar.

13. In the subsequent Green Gap Assessment report (August 2019), the site was included in the study area between Brookmans Park, Swanley Bar and Little Heath. The area between Brookmans Park and Swanley Bar was recommended for designation as a Green Gap Policy Area. Although the Society agrees with this proposal, it is considered that the designated area should be extended to include HS24.

14. Earlier, in the Call for Sites consultation of 2019, an extension to the site was promoted as LHe3, but this was rejected by the Borough Council Cabinet in January 2020. The Cabinet have also included site HS24 in their list of allocated sites which are recommended for removal from the Draft Local Plan. Should the Borough Council approve of the change, the Society will support the Council’s case at the Main Modifications stage. The allocation is neither justified, nor, effective, nor consistent with the national planning policy.

15. The existing boundary to site HS24 is robust and defensible, as it clearly defines the urban edge of Potters Bar. The Stage 3 Green Belt Review refers to the “weak proposed new boundary to the west” and states that it should be pulled back. The Society endorses this view - the proposed new boundary is much weaker, as it would impinge on the plateau area on the northern edge of the site. Any proposals for woodland planting on this boundary would detract from the open nature of the site and its rural character.

Matter 5 – Implementation (Question 167)

16. There is some doubt about the ability of the sites to be delivered in the early part of the plan period. In particular, there are concerns about whether improvements to drainage capacity can be achieved.

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Hertford

18th April 2020