

Welwyn Hatfield Local Plan, Sustainability Appraisal and draft Infrastructure Delivery Plan consultation

North Mymms Parish Council response - March 2015

Introduction

North Mymms is in the Borough of Welwyn Hatfield, Hertfordshire, between Potters Bar to the south, and Hatfield to the north. The Parish includes the villages of Brookmans Park and Welham Green, the hamlets of Bell Bar, Swanley Bar and Water End, and part of Bullens Green and Little Heath. There are shopping parades and railway stations at Brookmans Park and Welham Green, and an industrial estate at Welham Green. The parish has good transport links. North Mymms is a relatively large parish, it covers 1892.77 hectares and in the 2011 census the number of 'usual residents' was 8921, which is 4.7 persons per hectare.

North Mymms has been in existence for over 1,000 years. Records in the Domesday Book show the Bishop of Chester held Mimmine from 1086 and the Parish Church of St Mary's dates from the 14th Century.

In the 18th Century the Parish of North Mymms comprised two manors being Brookmans and North Mymms Park. The Gausson family were the biggest landowners in the parish until the early part of the 20th Century.

1926 brought the railway to Brookmans Park when a station was built and houses began to be developed thanks to the travel links to London. The BBC Transmitter Station was built at Bell Bar.

Little Heath became another settlement in the Parish of North Mymms in the last quarter of 19th Century. This period also saw a spate of home building in Welham Green including workers cottages. By 1894 North Mymms inhabitants numbered 1500. The Civil Parish was established at this time.

During the 1900s building continued including schools, shops and churches. Development largely took place in the villages from the 1930s to the 1950s and since then only small scale or individual developments have occurred on infill sites within the Green Belt boundary. By the 1950s the population of the parish had risen significantly.

Welham Green has a large industrial estate to the north of the village making it – reputedly – the largest industrial village in England.

National Planning Policy Framework – harm to the Green Belt:

Welwyn Hatfield Borough has established Green Belt boundaries.

NPPF Paragraph 83 states: “..... **Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.**”

In the written ministerial statement to Parliament on Local Planning on 6th March 2014, Nick Boles MP, Department for Communities and Local Government, states “*I would particularly note that we are re-affirming Green Belt protection, noting that unmet housing need is*

unlikely to outweigh harm to the Green Belt and other harm to constitute very special circumstances justifying inappropriate development.”

Department for Communities and Local Government issued new guidance on 6th October 2014, and Communities Secretary Eric Pickles MP said *“this Government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don’t want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities go to unnecessary development”*.

The need for house building for an increasing population in the parish is recognised but, having looked at the housing target numbers proposed following the Housing Needs Assessment and studies by Welwyn Hatfield Borough Council, North Mymms Parish Council questions the projections and considers these to be disproportionate and excessive. These must be reassessed to establish a realistic figure. This should take into account the current established Green Belt boundaries and also reflect the greater use of brownfield sites and conversion of existing buildings in other use classes, for example industrial or offices. The growth proposed in Welwyn Hatfield Borough is beyond what was intended for the ‘Garden City’ principles and the growth proposed around the villages would erode the separateness and character of these rural locations.

North Mymms Parish Council has held public meetings to garner opinion. It is the Parish Council’s responsibility as statutory Consultees to put forward the views and opinions of the community in a balanced manner.

The response from North Mymms Parish Council is reflective of those who commented following the public meetings, is cognisant of action group views and Councillors are aware of the wider implications of the proposals.

North Mymms Parish Council always endeavours to do the best it can for the community it serves. This means at times the Parish Council must take a stand which may be controversial.

Every individual in the parish has had the opportunity to respond to the Local Plan consultation and Welwyn Hatfield Borough Council will no doubt take all these replies into account.

General Reasoning

Local Residents have carried out considerable studies of the proposals and we do not intend to duplicate these however do give them weight as part of the Parish Council response.

The main objection to the proposals in the Local Plan is building on the Green Belt and alteration of its boundary.

Infrastructure is a major concern and, while this has been considered in the document “Infrastructure Delivery Plan (Jan 15)”, it is reliant on outsourced consultants who have produced this to align with the Local Plan. For example the current sewage treatment plants near Harlow and Rickmansworth are near capacity. Replacement and renewal of such facilities are unlikely to occur rapidly enough to accommodate all the additional development which will happen as soon as any greenfield sites, in particular, are released. The infill

development that is expected within the urban area also needs to be incorporated in the capacity requirement.

There are significant problems with traffic in the parish, this is exacerbated when there are problems on the A1 and M25 main road network along with peak time volumes of traffic. Increasing housing and commerce in and around the villages will add to this as well as pollution issues.

Parking in the centres of the villages and in certain locations, such as Osborne Road in Little Heath, causes disruption and inconvenience, which would not be alleviated by more residents and their cars.

Flooding is a concern as there are problems in certain areas which would not be corrected as part of any new development. It is understood that new buildings will have to incorporate suitable treatment to avoid any issues but this will not answer the localised problems and there is a concern that other consequential incidences will arise in the future because of the 'piecemeal' approach to this.

Local reaction to the proposals reflect great concern about facilities, such as school places, doctors' surgeries and the like, public transport and the road network and, especially hospitals given the distance and location of major A & E units.

Whilst this has to some extent been addressed, again delivery of suitable amenities at the appropriate time and location is unlikely.

For example, the local doctors' surgery is under great pressure and would not be able to expand as it is located in the Green Belt.

Local facilities for the parish are being eroded and diminished currently with, for example, the cuts to library services and County Council supported bus service. North Mymms parish is in a rural location and adding to the numbers of residents and possible commuters coming to work in the area, it is a nonsense to be reducing services such as these. The Local Plan Infrastructure document does not explain adequately how improvements would be addressed.

Leisure and Recreation facilities and services in the parish are limited and largely maintained and provided by this Parish Council and local voluntary organisations. Additional funding must be provided to enable this to continue and to be improved as there would be additional use from larger numbers of residents. We understand the "Community Infrastructure Levy" – that is still to be introduced – is intended to meet this and it must not be reallocated by Welwyn Hatfield Borough Council in order to ensure it is targeted to the community which it is meant to benefit.

North Mymms Parish Council has consistently stressed the requirement not to allow coalescence between the distinct villages. If any development is allowed to the north/south of each built up area this would occur and would be unacceptable. The Parish Council stresses the need for vigilance when considering proposals as merging of settlements must not occur by default "creep" across Green Belt boundaries.

The evidence presented as part of this consultation indicates a disproportionate increase in this parish of proposed housing numbers. North Mymms Parish Council cannot support this amount of development if it is not equitable.

It is imperative that all brownfield sites are utilised first before any development elsewhere is considered and previous windfall sites must be included. The re-use of other classes of buildings, such as industrial units or offices, within the curtilage of the villages should also be weighted in preference to any development on the Green Belt land and these numbers offset against the housing needs figure. There is potential within the parish for this to occur as there are empty units on the industrial site at Welham Green for example, and this could alleviate the pressure to encroach on the Green Belt.

Gypsy and Traveller sites

There is major concern to the proposal to allow the number of Gypsy and Traveller sites / pitches to increase in the parish, specifically in Welham Green area where there are already sites located. It appears unfair, disproportionate and unbalanced to expect almost all the Welwyn Hatfield Borough sites / pitches to be concentrated in one location in the Borough. It is also noted that enforcement is ineffective.

Individual sites

Welham Green - 16

WeG1 – 10 houses – Local opinion is not in favour of this site because of access and flooding. However, it is a previously developed site within the Green Belt.

WeG2 – 15 houses – Whilst local opinion is against this site there is some indication that development of this site would be possible.

WeG3 – 45 houses – Local opinion is opposed to this site because of access and flooding issues. It is land in the Green Belt and the site is highly visible from the west. There are concerns about the site not having a defensible Green Belt boundary.

WeG10 – 120 houses – North Mymms Parish Council understands that this land is not for sale and would therefore be undeliverable. However, the number of houses proposed would increase the traffic to Dixons Hill Road, which is a busy thoroughfare at peak times. This site is in the Green Belt and development would affect the openness. There would be defensible Green Belt boundary concerns with this site due to the proximity to Dixons Hill Close.

WeG4b (option 2) – 120 houses and employment – Whilst those who have expressed views are not in favour of development, it is acknowledged that a “least worst” situation might be some development on this site to the northern side only to avoid an over built up entrance to Welham Green village. The visual impact is a concern and use of tree belts must be included to reduce any intrusion. Access and increased traffic is also a concern and must not exacerbate current problems of this nature. The existing industrial estate at Travellers Lane currently has empty units, therefore, additional commercial provision is not justified.

WeG6 – 70 houses – This site is in the Green Belt and its development would move the boundary of Welham Green to the south, which would increase the potential of coalescence to Brookmans Park. However, small scale development, to a depth of one house/garden might be acceptable.

Local Plan consultation document paragraph 16.6: the expectation for only two dwellings to come forward within the existing urban area appears unrealistically low.

Hat11 site (Figure 60) lies within North Mymms parish and if developed up to 400 new dwellings on this site ought to be counted in the allocation of dwelling numbers to Welham

Green. Redevelopment of New Barnfield site (currently allocated by HCC for waste) is an extension to the built area of Welham Green. Any development of this site would close the gap between Hatfield and Welham Green and its allocation as a 'less favourable site' is supported.

Brookmans Park - 17

BPLH44 – Developed site.

It is considered that BrP13 (Figure 64) and BrP14 sites could fit in well with the existing built area.

BrP12, BrP6, BrP9, BrP10: North Mymms Parish Council strongly resists development because of the increased risk of potential coalescence of Brookmans Park with Welham Green and Brookmans Park with Potters Bar/Little Heath respectively. BrP1 and BrP2 also extend the urban area into the Green Belt and are not joined to the village. All these sites are poorly located in respect of the village centre.

BrP4 – 300 houses – This site is in the Green Belt, however, for the 'least worst' scenario a smaller scale development of reduced dwelling numbers might be acceptable. The site is close to the village centre and access to public transport, including the train. Key considerations include the road layout and infrastructure, design and character, and the site boundary must be permanent and defensible in the Green Belt with a tree belt to reduce the visual impact.

Local Plan consultation document paragraph 17.6: the expectation for only seven dwellings to come forward within the existing urban area appears unrealistically low.

Little Heath - 18

BrP7 – 140 houses – Local opinion is not in favour of this site. It is in the Green Belt and appears a large loss of land area for the number of houses indicated. It would increase significantly the potential of coalescence between not only Little Heath and Brookmans Park but also Potters Bar where Hertsmere Council has included an abutting site in their Local Plan. The housing numbers indicated are disproportionately high for this small parish ward. The height of the land would mean that any new buildings would be highly visible.

LHe1 – 35 houses – Whilst local opinion is against, this site could be a 'least worst' case and might be suitable. It is in the Green Belt and the site boundary must be permanent and defensible.

Local Plan consultation document paragraph 18.6: the expectation for only five dwellings to come forward within the existing urban area appears unrealistically low.

New Barnfield – Paragraph 5

This site is within North Mymms parish and therefore in response to CS4 "Green Belt Boundaries Safeguarded Land" paragraphs 5.9 and 5.10, North Mymms Parish Council objects to any proposal to review or alter the Green Belt boundary in this area because it would significantly contribute to the coalescence of Welham Green and Hatfield.

Summary

North Mymms Parish Council

It is of great concern in this parish, as is no doubt the case throughout the Borough, that the numbers for housing in particular are disproportionate and should be reduced.

The loss of any Green Belt land has to be detrimental not only to the Parish and Borough but to the “green lung” around London. North Mymms Parish Council strongly considers that land should only be taken out of the Green Belt as a final resort. Brownfield sites and possible reclassified use buildings must be utilised, and exhausted before any development is commenced on Green Belt land.

All new development of housing must meet the needs *of* and *for* local people.

Affordable housing must be provided and must be *affordable*.

Infrastructure is a major concern, especially where there is piecemeal development, and delivery of adequate facilities and services must be ensured.

The disproportionate concentration of Gypsy and Traveller sites / pitches in the Welham Green area on land in the Green Belt is an issue that needs to be addressed.

Whilst it is acknowledged that a new Garden City would not be deliverable in the short term, North Mymms Parish Council considers that the proposal to build such a community is good and should be pursued as a better alternative to this “add-on” approach to demographic pressures.