

EXAMINATION OF WHBC LOCAL PLAN 2016 -2036

Regulation 19

Little Heath Action Group

Statement on

Stage 9 Hearing Sessions: EX232 Statement of Common Ground between
WHBC & Royal Veterinary College.

11th February 2021

Introduction

During the Stage 8 Hearing Sessions Little Heath Action Group highlighted the irregular GB boundary the proposed HS24 (BrP7) would create across the WHBC and Hertsmere boundaries. We also shared the information that Hertsmere were also in the process of preparing a Local Plan Review. We asked why these two bodies had not yet worked together on their Green Belt Policies to create a uniform, defensible boundary.

WHBC have referred to document EX212 Stage 8 Hearing – Interim Report October 2020. In response, we too would like to highlight certain elements of this report. It concluded – 118. *Before it is allocated, the extent of housing at this site should be considered in the context of any development proposals on adjacent land in Potters Bar. I have asked the Council to consider, in consultation with Hertsmere Council, the location of an appropriate new GB boundary that would seamlessly cross the Borough boundary and satisfy the requirements of both authorities. 119. If an appropriate permanent boundary, along which a landscaping proposal that would screen the site from the wider GB can be established, then this could be a sound proposal.*

EX222B Actions following Stage 8 Hearing sessions – As well as discussing a GB buffer/landscape this action clearly highlights the requirement for a joint solution to the proposed Green Belt Boundary with Hertsmere Borough Council. (HBC)

EX232 Statement of Common Ground between Welwyn Hatfield Borough Council and Royal Veterinary College.

It is immediately apparent in the title of the document is that no Common Ground has been achieved with HBC. This document confirms *“it has not been possible to get agreement on a Green Belt Boundary in this location”*.

The document claims *“Hertsmere will be reviewing their Green Belt as part of their new local plan and there is no certainty that defining a boundary for this site which lines up with its current position will be appropriate in the longer term.”*

This statement is not a true position of Hertsmere’s Local Plan; later in the document, the Hertsmere Position text confirms...

Officers at Hertsmere are at quite an advanced stage in their site selection process of their new local plan.... However, none of the work HBC officers have carried out to date has a significant bearing on where they consider the precise green belt boundary should go in this particular location, and none of the promoted sites directly adjoin BrP7 (although the former Potters Bar Golf Course promotion is close).

Indeed, Hertsmere are at an advanced stage of their plan as indicated by the graphic from their web site to the right. Hertsmere have selected their sites, the closest of which, PB Golf Club, is over 1km from HS24. This probably explains why their Local Plan has no bearing on the current GB boundary.

<https://www.hertsmere.gov.uk/Planning--Building-Control/Planning-Policy/Local-Plan/New-Local-Plan/New-Local-Plan-Planning-for-Growth.aspx>



In addition, HBC ran a call for additional sites during 2019 with a consultation on these in 2020; whilst some may still be included, none are closer than potential Golf Course.

There are no sites in the current HBC Local Plan that are close to the WHBC border. Hertsmere are not looking at changing the current GB Boundary for this plan period.

HBC 2003 & 2016 Local Plans – Previous GB Boundary Assessment

LHAG would also like to point out that the GB Boundary next to WHBC has formed part of the last two HBC Local Plans in 2003 and 2016. It was assessed in some detail during the last Hertsmere Local Plan Examination in 2016. During the examination, to aid him in understanding the issues, the Inspector asked HBC to prepare a full response to raised questions. He also visited the site.

HBC responded that there were a number of reasons to not alter the GB Boundary (along the WHBC border) including but not limited to:

- *This land should be kept permanently open in order that it continues to contribute towards the five purposes of the Green Belt set out in Paragraph 80 of the NPPF*
- *Paragraph 83 of the NPPF states that exceptional circumstances are required to alter the Green Belt boundary, and the Council does not consider that there are any such circumstances in this case.*
- *The removal of the site from the Green Belt would not accord with Paragraph 84 because its removal could open the way for development to be put forward on the site, which would not help to deliver sustainable development within the urban area.*
- *It is not considered that moving the Green belt boundary further to the west would result in a substantially more defensible boundary than that which already exists and has been established through the Local Plan for many years.*

Above text in italics taken from HBC Local Plan Examination - Hertsmere Borough Council's response to the Inspector's List of Matters, Issues and Questions February 2016.

http://www.hwa.uk.com/site/wp-content/uploads/2015/11/HBC_Hearing_Statements_February_2016.pdf

Ultimately, the inspector held up the view of HBC and no changes to the GB Boundary were made.

Given the above, that the HBC Plan is at an advanced stage, no sites close to WHBC are likely, HBC and a Planning Inspector have looked at this GB Boundary recently (2016) within the process on a Local Plan Examination we feel it is unlikely HBC will change their view soon.

Additionally, the new HBC Local Plan is due to run until 2036/2037 which would match timing with WHBC. This would provide a both authorities a coordinated opportunity for a joint Green Belt review after their current plans come to an end.

Given the Inspectors view that an appropriate boundary is one that joins seamlessly "*the location of an appropriate new GB boundary that would seamlessly cross the Borough boundary and satisfy the requirements of both authorities*" **LHAG feels that defining a boundary that lines up with the current GB boundary WOULD be appropriate in the longer term, certainly until the end of the plans in 2036.**

The Hertsmere Position continues as follows:

Officers' other observation is that the south western corner of the site would appear something of an "outlier" area in terms of the green belt boundary in this location and could increase pressure for boundary changes and development in HBC area to the south.

LHAG would agree without the support from HBC the proposed new boundary would be inconsistent and encroach into the countryside.

To the immediate south of the WHBC/HBC border there are multiple small plots of land, one small field, and a school sports field. Very few of these when taken alone would seem likely to pass the tests of exceptional circumstances due to their size or on sustainability issues and would constitute further encroachment and piecemeal development.

HS24 (BrP7) proposed boundary could be open to speculative, infill and ad hoc planning attempts and not be readily defensible to the south.

Landscaping and Screening

In EX232 #117 the inspector makes reference to "However, at the moment, development at Wain Close is prominent in the views across this countryside GB, when seen from the public footpath to the north of Hawkshead Road. Whilst new development would remove these dwellings from the views, unless the new boundaries are carefully defined and appropriate earthworks and landscaping can be implemented, a development in this location could have a similar profound and negative visual impact on the openness of the wider GB as that adjacent to the existing boundary"

LHAG would like to highlight the fact that much of the development on the higher ground adjacent to Wain Close, Kerdistone Close and the top of Heath Drive would all be clearly visible from the footpaths north and south of Hawkshead Road.

This picture is taken from the footpath to the south of Hawkshead Road (next to Boulton's Farm) from which the Houses of Kerdistone Close and potential HS24 land in front of it is in open view. The proposed landscaping buffer would be on far lower ground within the dip and not shield potential new development from sight.



We kindly request the inspector visits the site so the visual openness may be experienced first-hand.

Closing

It seems clear development proposals on adjacent land in Potters Bar have not been properly reported in EX232. LHAG has provided evidence that, as recently as 2016, HBC consider the current boundary appropriate.

Whilst WHBC and RVC have come to an agreement on planting and landscaping this was not the main issue of concern; the GB Boundary location with Hertsmere was.

The two Boroughs have not been able to agree *“the location of an appropriate new GB boundary that would seamlessly cross the Borough boundary”*.

The HS24 proposed boundary change would be inappropriate and leave a weaker less defensible boundary to the south.

Whilst Hertsmere Borough Council have not objected, they have not endorsed the allocation of the HS24 (BrP7) site. S106 payments are still to be agreed as are many DtC issues.

There are still questions of *“profound and negative visual impact on the openness”* of this site.

We would also point to the recent submission by LHAG in response to HCC EX206A Education Statement on School Places in Little Heath and Potters Bar.

So, in light of the inspector’s comments and requests in EX212 items #177, 118 and 119 and EX222B we find it difficult to see how this could be considered a sound proposal.