

North Mymms District Green Belt Society

Comments on application 6/2022/2409/OUTLINE

The Society objects to the application.

The site is within the Green Belt; the proposed development is inappropriate and by definition harmful to the Green Belt. It should not be approved except in “very special circumstances” as set out in NPPF paragraph 148.

The site has been included in the current version of the Council’s emerging Local Plan (for 14 dwellings not the nine in the current application). Because of that the applicant asserts that the “very special circumstances” test is satisfied and that there should be no objection to the development on Green Belt grounds.

The society believes this argument is incorrect. The correct test is the “exceptional circumstances” referred to in NPPF paragraph 140 where Green Belt boundaries should only be altered as part of the development or updating of strategic plans.

Because the Council is unable to satisfy its assessed housing target except by using using Green Belt land it believes that “exceptional circumstances” justify the adjustment of the Green Belt boundaries. That determination applies to the Plan as a whole, not to any individual site.

Accordingly, until such time as the Plan is agreed, the “very special circumstances” test under NPPF paragraph 148 should apply to all applications whether or not they are proposed for inclusion in the Plan.

The Plan is still in discussion and there is no decision on the target number of dwellings. It is entirely possible that the target will be lower than currently envisaged and that development of a particular site within the Green Belt will not be required. It is therefore not appropriate to approve individual sites within the Green Belt until such time as the Local Plan has been agreed.