

MY OBJECTION — HERTSMERE LOCAL PLAN REGULATION 18 CONSULTATION

Proposed candidate allocation HPBA SA13: Former Potters Bar Golf Course, Darkes Lane, EN6 1DE

I am a resident of [YOUR TOWN/AREA] and I formally object to the proposed housing development of the former Potters Bar Golf Course. I am not opposed to housing in principle. I am opposed to this specific proposal because the evidence shows it has not been demonstrated to be justified, safe or deliverable.

[Please add your own reason here — for example: I walk past this site regularly; I am concerned about flooding in the Potters Bar Brook valley; I value this open Green Belt land and its wildlife. A personal paragraph carries more weight than a copied statement.]

THE KEY NUMBERS THAT HAVE NOT BEEN EXPLAINED:

42–59 homes — what a developer-side consultant assessed this site as being able to hold, using Hertsmere’s own planning data (RPS Sequential Test, August 2024)

400 homes — what Hertsmere is proposing to allocate in the Local Plan

550 homes — what the developer is applying for

This tenfold discrepancy has not been explained. I want a clear, public answer and a commitment to transparency. This application should not be approved.

MY SPECIFIC CONCERNS:

- **DARKES LANE IS THE ONLY VEHICULAR ACCESS TO THIS SITE.** This point is critical for the Local Plan evidence base. The railway tunnel at the western boundary runs under the London–Edinburgh main line, is pedestrian-only, flood-prone and subject to Network Rail restrictions. The Hertfordshire Way footpath, the only other pedestrian access, exits via a private road in the Potters Bar Conservation Area, crosses privately owned land, and is regularly flooded by run-off from adjacent fields. A development of 400 homes cannot be served by a single flood-affected vehicular entrance with a similarly compromised secondary access.
- **THE APPLICANT’S OWN DOCUMENTS CONFIRM THERE IS A COMPROMISED SECONDARY EMERGENCY ACCESS.** The live planning application’s Design and Access Statement (DAS, Section 1.2) describes the “emergency access” as a pedestrian and cycle path alongside Darkes Lane, controlled by a rising bollard and built to active travel standards. Section 5.7 (page 72) describes it as serving emergency vehicles only “if necessary” — conditional language. The cross-section drawing shows this route is 5.0m wide and built to bound aggregate standard — not structurally rated for fire engines (14–18 tonnes). No Approved Document B-compliant specification is provided. Crucially, the applicant’s own flood modelling (DAS Section 2.9) identifies existing shallow flooding on Darkes Lane north of the site in storm events. Both the primary vehicular access and this compromised emergency access connect to the same stretch of Darkes Lane and fail simultaneously in flood conditions.

The Local Plan evidence base must reflect that this is not a secondary access. This fails NPPF paragraph 181(e) — safe access and egress for the lifetime of the development.

- **THE PROPOSED BUILDING HEIGHTS CANNOT BE PROPERLY ASSESSED.** The applicant's Building Heights Parameter Plan (Parameter Plan 03, DAS page 58) sets a maximum ridge height of 11.0m for nominally "2-storey" residential zones — compared with the 7.5–8.5m typical of 2-storey houses in Potters Bar. Heights are measured from proposed ground floor levels which may themselves be raised 1m above existing ground. On this sloping site, "2-storey" buildings will present the visual mass of 2.5 to 3-storey structures when viewed from lower elevations. The parameter covers entire character zones, preventing meaningful assessment of visual impact on the surrounding area and the adjacent Darkes Lane (West) Conservation Area. This is contrary to SADM26 and NPPF paragraphs 130–133. The Local Plan evidence base should not treat this as an acceptable design framework.
- **THE FLOOD ACCESS HAS NOT BEEN RESOLVED.** The only vehicular access depends on works to a flood-prone watercourse crossing on Darkes Lane. A Hertsmere planning officer's email of 5 March 2024 (EIR2026/12448) shows the site was previously included in the 2024 Local Plan consultation while this question remained unresolved. The EA's pre-application correspondence bundle confirms it requires open-span bridges at all Potters Bar Brook crossings — those bridge designs have never been modelled or reviewed. The EA expressly reserves the right to change its position at application stage. Any access works must also be shown not to worsen flood conditions for existing residential neighbours near the entrance.
- **THE COUNCIL REFUSED A NEARBY LARGE GREEN BELT SCHEME PARTLY ON FLOOD GROUNDS.** In December 2025, Hertsmere refused application 24/1101/OUTEI because the Flood Risk Sequential Test had not been satisfied. The golf course has a worse flood profile. Hertsmere will need to explain any inconsistency in decision making satisfactorily before including a site at greater risk of flooding for housing in the Local Plan.
- **PRIMARY EVIDENCE CONFIRMS PRE-EXISTING DRAINAGE CONSTRAINTS AND UPSTREAM WATER QUALITY RISK.** Thames Water's EIR response (EIR-23-24-626, 4 March 2024) confirms a 630m³ foul water storage tank with consented storm overflow (permit TEMP.2548) into Potters Bar Brook within Source Protection Zone I. Photographic evidence shows what may be agricultural runoff entering the watercourse near the railway tunnel. The developer's own documents state that Thames Water foul drainage capacity remains unconfirmed. The Hertfordshire Water Study 2017 identifies northern Potters Bar water infrastructure as requiring immediate strategic intervention.
- **THE SITE HAS BEEN REWILDING SINCE 2018.** Almost all evidence of the former golf course has been naturally reclaimed by vegetation. CEG may argue this supports a 'grey belt' dereliction characterisation. It does not: rewilding is ecological recovery, which increases the site's biodiversity value and reinforces the case against development. It is consistent with protecting the biodiversity quality of Green Belt sites as stated in Hertsmere's own Potters Bar vision. The site supports protected wildlife including newts, badgers and bats.

- **THE AFFORDABLE HOMES PROMISE MAY BE AT RISK.** Unresolved infrastructure costs — bridge engineering, foul drainage upgrades within SPZ I, ecological mitigation for approximately 1,601 TPO trees, and transport mitigation — threaten Hertsmere’s ability to meet its housing targets if the 275 affordable homes promised cannot be delivered. Without a published viability assessment, there is no reliable evidence that the commitment is deliverable.
- **THE ROAD JUNCTION RAISES SERIOUS CONCERNS.** The developer’s own traffic evidence shows the Baker Street / Darkes Lane junction would operate above practical capacity in the evening peak with no mitigation proposed.
- **THE HOUSING SITE MATRIX CONTAINS AN INTERNAL CONSISTENCY FAILURE.** Under Hertsmere’s own 8-criterion scoring matrix, Criterion 7 (technical objections) was scored 5 (no objections) for the golf course — inconsistent with the Thames Water, LLFA and transport evidence. PB3 (refused December 2025 on flood grounds) scored 47; the golf course scored 46.5. The Council refused the better-scoring site. This internal inconsistency cannot be dismissed as following the preferences of the people of Potters Bar because there is no evidence to support that assertion.
- **THERE IS A BETTER USE FOR THIS LAND.** The rewilding former golf course could become a country park, sports pitches, community space and ecological reserve — uses that fit the site’s constraints and serve Potters Bar residents far better than a large housing estate with a highly problematic flood-affected access. Such uses would be far more respectful for of the flora, fauna and wildlife on the site as well as preserving the natural flood plain.

WHAT I AM ASKING FOR:

I request that the Council either removes HPBA SA13 from the Local Plan, or does not proceed to Regulation 19 until: the 42–59 / 400 homes discrepancy is explained; bridge-based hydraulic modelling reviewed by the EA is published; a genuinely independent secondary emergency vehicular access not compromised by Darkes Lane flooding is demonstrated; the proposed building heights are shown to be compatible with SADM26 and the Darkes Lane (West) Conservation Area; the precise status of the EA model review and HCC LLFA consent position are published; Thames Water capacity is confirmed; a viability assessment demonstrates the affordable housing commitment is deliverable; and the inconsistency with the PB3 refusal is resolved.

Name: _____

Address / Postcode: _____ Date: _____

Submit your representation to: the Hertsmere Local Plan consultation portal, or by email to planningpolicy@hertsmere.gov.uk | Full evidence and technical objection: www.pottersbar.vision