

WELWYN HATFIELD CORE STRATEGY ISSUES AND OPTIONS CONSULTATION

CPRE – The Hertfordshire Society comment on the Welwyn Hatfield Core Strategy Issues & Options consultation document as follows:

As our comments fall into a number of categories which do not respond directly to the sections in the Consultation Document, we have chosen to respond by letter rather than use the pro-forma included with the consultation documents.

General Matters

While the key issues facing the Borough are clearly stated, we are disappointed at the lack of key supporting evidence in the document, which has limited our ability to assess the likely impact of some of those issues and, consequently, to give a reasoned response to them. In particular, the fact that neither the Strategic Housing Land Availability Assessment nor the Strategic Housing Market Assessment data is complete, or available as part of this consultation, means that our views on the likely balance between the use of previously developed land and potential Green Belt releases has had to be speculative. This, in turn, impacts on our consideration of the suitability of the potential growth areas.

Green Belt

The Council, rightly, draws attention in paragraph 2.1 to the fact that 80% of the Borough is open countryside, all of it in the Green Belt, and that the key challenge is to reconcile the need to plan for growth while at the same time protecting natural resources and environmental assets.

We particularly support Strategic Objective no. 2 in the list of borough-wide objectives, which states that the Council's intention is to maintain the Green belt and to concentrate development within the main towns and villages, in particular on previously developed land.

However, despite those comments and repeated references to the need for the Green Belt review to accommodate housing growth, at no point in the document (not even in the glossary) is there a definition of what the Green Belt is, or what its purposes are. Nor is there a reference to PPG2 and its provisions, despite the fact that Option PG30 (on coalescence) is inviting the public's views on something which is contrary to those provisions. We appreciate that this may be a reflection of the Government's view that national policies should not be repeated in LDF documents. However, it is unreasonable to assume that a lay person reading the document would be aware of these points, and their importance in the context of this consultation, and hence to omit them entirely.

Similarly, the list of criteria used to assess the need to protect and enhance environmental assets (paragraph 4.1) does not include Green Belt designation or the provisions of PPG2. We believe that it should.

Countryside

As mentioned above, the Council has identified that 80% of Welwyn Hatfield is open countryside. Despite this, the proposed vision for the Borough (page 38, VI) is entirely focused on the urban areas, with no reference to a vision for the countryside or rural areas at all. Equally, the statements on Local Character (paragraphs 5.66 – 5.71) focus on the urban areas and make no reference to rural character. We consider this to be a substantial deficit in the strategy and one which the Council needs to address.

We are, however, grateful that the Council recognises the importance of tranquillity and the effects of light pollution, and we thank them for their acknowledgement of the work done by CPRE in these areas. (There is a typographical error in para 4.67, which should read "Campaign to Protect Rural England".)

Housing Growth

The consultation document acknowledges that, in accordance with the Regional Spatial Strategy (RSS) Policy LA3, overall housing growth to 2021 should be focused mainly on Welwyn Garden City and Hatfield (paragraph 2.22). We support that approach. The RSS requires at least 10,000 houses to be provided in the Borough by 2021, of which 4,155 have already been built, leaving 5,845 to find. A further 500 dwellings a year need to be planned for up to 2026 (total 2,500) to meet the requirement for a 15 year land supply (paragraph 6.225). The Council estimates (page 243) that the potential exists to accommodate 3,100 dwellings within existing urban areas. This implies that sufficient land will have to be released from the Green Belt to accommodate 2,745 dwellings by 2021, with a further 2,500 by 2026 and another 2,500 by 2031, giving a total of 7,745.

While CPRE are opposed in principle to further erosion of the Green Belt, we accept that growth of the size currently envisaged by the RSS will require some expansion into the Green Belt. However, we are concerned that the necessary Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment have not yet been carried out (paragraph 6.228). Without the SHLAA data, it is difficult to do more than speculate on the relative balance between potential brownfield and green belt development, but our view is that sites for significantly more than 3,100 dwellings may be found for the period up to 2021.

The Council have identified a number of potential broad directions of growth into the Green Belt. Confusingly, within the body of the text they are given alpha-numeric reference numbers, but on the Key Diagram they are given completely different initials. In our comments below we have used both.

Site (A) PG33 North East of Welwyn Garden City

This has been a site of special restraint in previous District Plans, securing it for future development, and is one which CPRE would accept as a logical expansion of Welwyn Garden City. Care would have to be taken to mitigate the effect of development on the Mimram Valley.

Site (B) PG34 South East of Welwyn Garden City.

CPRE do not consider this site to be suitable due to the impact which it would have on the openness of the Green Belt along the A414 corridor between Mill Green and Birchall Lane.

Site (D) PG36 West of Hatfield Aerodrome

There are conflicting comments within the consultation document regarding this site. On page 46, the Council point out that care should be taken to “ensure that development proposals do not sterilise the opportunity to extract minerals where they arise”. This site is identified as being capable of delivering 8 million tones of aggregates according to the Hertfordshire Minerals Plan. This would take at least 10 years to extract. Consequently, if extraction is proceeded with, development of this site could not take place until the later stages of the Core Strategy period at the earliest. It is therefore not really practical to allocate this area for housing until a firm decision about mineral extraction has been taken.

If this area were to be proposed for housing, CPRE would oppose it, as development of the area would lead to coalescence with St Albans. (As a side issue, this Core Strategy does not take into account the development proposals of adjoining Authorities which, in this case, could lead to conflict.)

Site (E) PG37 West of Ellenbrook

CPRE oppose this site because of potential coalescence with Sleapshyde and Smallford and damage to the A414 Green Belt corridor between Sleapshyde and Junction 3 of the A1(M).

Site (F) PG38 South of Hatfield.

South Way is, and was historically intended to be, the clear demarcation of the southern boundary of Hatfield. CPRE would not support breaching that boundary and the erosion of the Green Belt between Hatfield and Welham Green.

Site (H) PG40 West and South of Brookmans Park
CPRE would oppose. Both of these sites would cause substantial damage to the Green Belt and breaching the western boundary established by the railway line would set an unwelcome precedent.

Site (I) PG41 West and South of Cuffley
CPRE would oppose. This land is at the highest western point of the village and its impact on the openness of the countryside when viewed from both Northaw and across the Cuffley Brook valley from Goffs Oak would be substantial.

Site (K) PG43 Oaklands Mardley Heath
Again the breaching of the western boundary created by the A1(M) would not be acceptable.

Site (L) PG 44 North of Woolmer Green
CPRE would not support this site due to the potential for coalescence with Knebworth.

Site (M) PG45 East of Little Heath
CPRE would not support due to the potential for coalescence with Potters Bar (exacerbated by the proposal in the Hertsmere Core Strategy to expand Potters Bar towards Little Heath).

Site (N) PG46 East of Digswell
CPRE would oppose as this would lead to encroachment into the Mimram Valley.

In addition, there is not sufficient clarity on the potential constraints due to infrastructure capacity (particularly sewerage) to enable us to make clear judgements on each of the proposed growth areas.

Affordable Housing

We welcome the Council's proposal to seek to deliver a range of housing types, sizes and tenures when providing affordable housing. However, we would like to see the minimum requirement raised from the 35% proposed by the Government to 40%, which is more likely to address local need. We would also remind the Council that PPS3 advises that it can set thresholds lower than the 15 units mentioned in the guidance.

Rural Economy

We also welcome the Council's statement in paragraph 6.45 that local entrepreneurs indicate that there is a demand for small, inexpensive rural premises for business use, and we assume that the Council will therefore make all efforts to 'retain existing clusters of employment uses in villages and other rural locations' by resisting the conversion of farm premises to residential units.

Finally, we wish to respond to some of the specific questions included in the consultation:

Character Expansion (SC6, SC7 and SC8)

These are not mutually exclusive. All three are appropriate in specific locations. The Council should exercise its judgement, treating each site on its own merits.

Affordable Housing (SC17 and SC18)

CPRE supports SC18, with the proviso that the threshold should be lowered from 15. It is unlikely that most proposed developments in villages would be greater than 14 units and, with the proposed threshold, little affordable housing would result in rural areas.

Housing Density 1 (PG25 and PG26)
CPRE support PG26

Housing Density 2 (PG27 and PG28)
CPRE supports PG28 – again each site should be considered on its own merits and local character.

Relationships Between Settlements (PG29 and PG30)
CPRE (and the Council) have no option but to support PG29. This question goes against the basic tenets of National policy relating the Green Belts contained in PPG2. Essentially the Council is asking people whether or not they would want the Council to breach those policies by allowing settlements to coalesce. We consider that to be improper.

Options for Housing Distribution (PG31 and PG32)
CPRE support PG31.