

## **WELWYN HATFIELD LOCAL PLAN: PROMOTED SITES CONSULTATION 2019.**

### Note for CPRE Herts members and supporters

The Consultation can be found on the Welwyn Hatfield Local Plan [Examination website](#) as well as the WHBC website and runs to 18th June. Responses can be entered into the Consultation portal or made by post or email using [forms](#) provided.

The consultation forms part of the Local Plan examination process in which the Examination Inspector has asked Welwyn Hatfield Council to see whether additional land could be identified to help meet an increase in objectively assessed housing need for a further 4,000 houses, taking the total from 12,000 to 16,000 new houses in the Plan period.

140 sites are being promoted including all of those previously rejected by the Council when preparing the Plan. Most are in the Green Belt and CPRE Herts estimates that the total capacity of all the Green Belt sites could be as much as 14,250 houses plus another 2350 in urban areas.

The Council will consider whether, and how many, specific sites should be put forward as additional allocations for the Inspector's Examination of the Plan to consider. Up to now the Council has stated that meeting all the identified Housing Need in the Borough should not be met because of the consequences for the Green Belt.

CPRE Herts has repeatedly argued that National Planning Policy requires Councils to restrict their Housing Targets to a level that prevents Green Belt harm, and to demonstrate the existence of 'exceptional circumstances' for removal of any land from the Green Belt for Housing. That situation has not changed with the revisions to the National Planning Policy Framework (NPPF) in 2018, or the more recent updates in February 2019.

New national Household Projections based on 2016 information shows that there are likely to be far fewer households in the Borough by the end of the Plan period (approx. 16% less) than previously assumed by older 2014 information used to prepare the Plan, but despite this adding to the reasons for not removing so much land from the Green Belt, there has been no move yet by the Plan's Inspector to debate the implications despite requests for him to do so.

CPRE Hertfordshire therefore continues to oppose any increase to the Council's Housing Target in the Plan, or the release of any additional land from the Green Belt to meet that Target.

CPRE Herts would, however, support the removal of sites in the Green Belt from the Submitted Plan if alternative sites identified in the Consultation would have less impact on the Green Belt purposes as set out in the NPPF. In this regard, CPRE Herts notes that, as it stated in submissions to the Plan Examination, significant additional capacity can be provided on previously developed urban land in the Borough than previously claimed by the Council, and this land should be developed rather than 'greenfield' Green Belt.

Attention is drawn to the following documents on the Examination website (see [Examination Library](#) under Green belt and Housing) that would help people concerned about any of the 140 promoted sites to make comments on them in the light of the evidence provided by the Council to support the Local Plan:

- Documents GB/1 to GB/5 are the series of 3 Green Belt Reviews and their appendices from 2013 to 2018.
- GB/1 Annex 1.3 'Welwyn Hatfield Final' describes in detail the parcels of Green Belt that might now be affected by the promoted sites. This will help people to comment on those sites;
- GB/2 and GB/3 go into greater detail on individual sites that the Council was considering in 2014 and 2016;
- GB/4 includes 3 documents, a Main Report, updates maps, and updated appendices following the last stage of the Plan Examination;
- GB/5 is 4 documents, a 'Final Report', addendum, appendices and maps from that same Stage 3 Green Belt Review;
- HOU/20 and HOU/20A are the Housing Sites Selection Report and Appendices analysing the individual sites being considered for inclusion in the Plan in 2016.

It is particularly illuminating when the 'professional' opinions on areas of Green Belt and specific sites in the various stages of review are compared, and anyone worried about a particular site should check to see whether the information set out in the reviews and the selection process is consistent and whether this information helps them to prepare their comments on the Consultation.