

# Welwyn Hatfield Council Draft Local Plan Proposed Pre-Submission

## Representation

By Campaign to Protect Rural England (CPRE) Hertfordshire  
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## PART B

### Section 5

To which part of the draft Local Plan does this representation relate?

Paragraph Number:	
Policy Number:	SADM 33
Policies Map Number or Inset Map Name:	
Table Number:	17
Figure Number:	

### Section 6

Do you consider the draft Local Plan is legally compliant?

No response

### Section 7

Do you consider the draft Local Plan is sound?

Yes	
No	X

If no, is this because it is NOT (please select all that apply):

Positively prepared	
Justified	X
Effective	
Consistent with national policy	X

**Please give details of why you consider the draft Local Plan is sound or unsound. Please be as precise as possible.** (Attach supporting documents if necessary.)

No exceptional circumstances have been set out by the Council for the removal from the Green Belt of proposed housing sites HS28, HS29 and HS30, for in excess of 250 dwellings beyond the southern edge of Cuffley, contrary to national planning policy (NPPF paragraph 83).

Development of these sites would have a major impact on three of the stated purposes of the Green Belt, and the consequential linear projection of Cuffley south-westwards into the highly sensitive area of Green Belt between Cuffley and London that would result from proposals HS28 and HS29 is contrary to good planning practice as well as long established Green Belt policy for the area. No justification for the removal of these sites from the Green Belt is set out other than a general claim in the text that the Council's housing target needs to be spread across the whole Borough.

CPRE Hertfordshire contests this target which is excessive and based on aspirational employment and economic factors, not objectively assessed need, contrary to national planning policy.

These proposals are therefore unsound, in that they are not justified by the evidence presented by the Council, and because housing target for the Borough, as explained in our representations on Policy SP 2.

## Section 8

**Please set out the changes you consider necessary to make the draft Local Plan legally compliant or sound including revised wording of any policy or text. Be as precise as possible.** (Please note that any non-compliance with the Duty to Co-operate cannot be rectified at the examination.)

**You will need to say why the change will make the draft Local Plan legally compliant or sound.** (Attach supporting documents if necessary.)

Policy SADM 33 and Table 17 should be amended by the deletion of Sites HS28, HS29 and HS30.

**If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing?**

<b>No</b>	I do not wish to take part in the examination hearing	
<b>Yes</b>	I wish to take part in the examination hearing if invited to do so by the Inspector	<b>X</b>

## Section 9

**If you wish to take part in the examination hearing, please outline why you consider this to be necessary:**

CPRE Hertfordshire wishes to explain the particular consequences of the removal of these sites from the Green Belt in the context of the long-established permanent Green Belt boundary around Cuffley, and believe that these need to be addressed in an Inspector-led discussion of the three proposals.

**Do you wish to be notified of any of the following?** (please select all that apply)

<b>When the Welwyn Hatfield Local Plan has been submitted for independent examination</b>	Yes
<b>When the Inspector's Report of the Welwyn Hatfield Local Plan is published</b>	Yes
<b>Adoption of the Welwyn Hatfield Local Plan</b>	Yes

**Signature :**



**Date : 24<sup>th</sup> October 2016**