

WELWYN HATFIELD LOCAL PLAN PROMOTED SITES CONSULTATION 2019: CPRE HERTFORDSHIRE COMMENTS

General Comments on Consultation

The consultation invites comments on any or all of 140 sites promoted in 2019 for development, or previously considered but rejected by Welwyn Hatfield Borough Council when selecting sites for inclusion in the Pre-submission Local Plan.

CPRE Herts is not in a position to comment 'en bloc' on all of these sites or comment individually on any of those sites to the exclusion of others.

CPRE Herts does however wish to express extreme concern that the Local Plan Inspector considers that it is necessary to investigate whether there are additional Green Belt sites available to meet a higher level of notional housing need than identified by the Council when it was preparing the Plan, and that a huge additional area of Green Belt land, capable of accommodating over 14,250 houses, is now under threat as a result.

CPRE Herts has repeatedly shown 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.

Housing Need context

The scale of future housing need is not greater than assessed by the Council when preparing the Plan, and National Planning Policy Framework (NPPF) policies for protection of the Green Belt still apply. That situation has not changed with the updated NPPF February 2019. Moreover, the latest NPPF does not apply to the Welwyn Hatfield Local Plan in any event because it states (paragraph 215) that the earlier 2012 NPPF applies to all Plans (including Welwyn Hatfield's) submitted before January 2019.

This means that the Council is not required to re-calculate housing need using the government's new standard method and the old (2014-based) household projections.

What is clear however, is that the newer (2016-based) household projections for Welwyn Hatfield indicate that housing need is likely to be much (around 16 percent) lower than assumed when the Council was preparing the Plan, and this alone justifies avoiding any net additional loss of Green Belt in the Plan.

Therefore the only good reason for considering the Promoted Sites put forward in the current Consultation is to determine whether any of the potential sites not in the submitted Local Plan would be 'better' alternatives than those that are, because and in the opinion of CPRE Herts, there should be a reduction in the amount of land proposed to be taken out of the Green Belt in the Plan not an increase.

Necessity of further Examination Hearing

There has been no move yet by the Plan's Inspector to debate the implications of the new Household Projections at a further Local Plan Examination Hearing session or sessions, despite requests for him to do so.

CPRE Herts notes (and has pointed out in submissions to the Council and the Examination) that in addition to the new household projections information, significant additional housing capacity can be provided on previously developed urban land in the Borough than previously claimed by the Council. This includes land now being put forward in the Promoted Sites consultation. Such land should be used rather than 'greenfield' Green Belt which does not therefore need to be removed from the Green Belt through the Local Plan on the scale currently proposed.

We continue to ask for the above matters to be discussed at a further Examination Hearing.

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