

Welwyn Hatfield Council Draft Local Plan Proposed Pre-Submission

Representation

By Campaign to Protect Rural England (CPRE) Hertfordshire
31a Church Street, Welwyn, Herts. AL6 9LW
office@cpreherts.org.uk

PART B

Section 5

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

| | |
|---|-----------|
| Paragraph Number: | 4.3 – 4.4 |
| Policy Number: | |
| Policies Map Number or Inset Map Name: | |
| Table Number: | |
| 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.)

The text setting out the Council's justification for policy SP 1, fails, in paragraph 4.3, to refer to Green Belt as a constraint on the level of housing growth to be provided for, contrary to paragraph 14 of the NPPF.

This is particularly surprising for two reasons. Firstly, the accepted fact that all the land in the borough outside existing settlement boundaries, except for one site safeguarded for development in the extant Local Plan, is designated as Green Belt, and secondly, because of the emphasis in NPPF paragraph 14 and footnote 9 on constraining development when seeking to meet need in areas such as Welwyn Hatfield.

The text in paragraph 4.4 also fails to recognise the actual scale of development capacity of the borough's urban areas other previously developed land, and as a result of changes to permitted development rights, which would enable the Council to meet a greater proportion of the borough's needs than stated in the Plan.

Please also see our representations on chapter 6.

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.)

The words 'Green Belt constraints' should be inserted after the word 'recognises', in paragraph 4.3.

For paragraph 4.4, the capacity of the urban areas and previously developed land should be reviewed in the context of current government policies and regulations in order for the text to refer to a greater contribution to development needs from these sources.

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

| | | |
|------------|---|----------|
| No | I do not wish to take part in the examination hearing | |
| Yes | I wish to take part in the examination hearing if invited to do so by the Inspector | X |

Section 9

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

CPRE Hertfordshire considers that the capacity of the borough to accommodate development before using Green Belt land is a matter of fundamental importance to the future planning of the borough, and that this matter should be addressed by an Inspector-led discussion.

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

| | |
|---|-----|
| When the Welwyn Hatfield Local Plan has been submitted for independent examination | Yes |
| When the Inspector's Report of the Welwyn Hatfield Local Plan is published | Yes |
| Adoption of the Welwyn Hatfield Local Plan | Yes |

Signature :



Date : 24th October 2016