

# 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 26 |
| Policies Map Number or<br>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 removal of site SDS5 (Hat 1 – inc. Hat13) from the Green Belt is not justified by adequate evidence of exceptional circumstances as required by paragraph 83 of the NPPF.

The proposals are based on a Borough-wide Local Plan Housing Target that is also unsound as explained in representations on Section 3 (Spatial Vision) and Policy SP2 (Targets for Growth).

Furthermore development of this site would have a significant adverse impact on four of the stated purposes of the Green Belt. It is therefore both unsound in that it is unjustified by the evidence presented by the Council, and not consistent with national Planning policy as set out in the NPPF for the protection of the Green Belt.

(See also representations on Policy SP 22 and its supporting text)

## 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.)

Site SDS5 should be deleted from the schedule in SADM 26, Policy SP 22 deleted, and consequential amendments made to the text of the Plan from 15.36 to 15.38, and Figure 14.

**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 participate because the charity's opinions and evidence on the soundness of the proposal and its consequences, are not addressed by other interest groups, the local authorities, landowners and developers, or statutory bodies, and believe that they need to be addressed in an Inspector-led discussion of the 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**