

# 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:	3.2
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.)

Several elements of the 'spatial vision' set out in paragraph 3.2 are unsound in that they are unjustified and inconsistent with national planning policy:

That statement that 12,000 new homes will be built is not justified by evidence presented by the Council and is based on a flawed housing target. Please see our representation on Policy SP 2 for our comments on this matter.

That statement that a new village of around 1,100 dwellings will have been created is not justified because this proposal is itself unjustified, unsustainable and in conflict with national policy, as explained in our representations on policies SP 24 and SADM35.

The figure of 6,200 dwellings to be built on land to be removed from the Green Belt is neither justified nor consistent with national planning policy, as explained in detail in our representations on Policy SP 2 and chapter 5 of the Plan.

Strategic Objective 1 to provide for the borough's development needs over the plan period is not justified in the absence of a definition of development needs that accepts that some of these needs will be met elsewhere, and that they reflect 'development need' as defined in the national planning policy framework.

## 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 text should be changed to exclude a specific number of dwellings to be built, to delete the reference to a new village and the number of dwellings to be built in the Green Belt, and to clarify that a significant proportion of the borough's development needs will be met elsewhere.

**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 reasons for concerns about the Plan's vision, and how this relates to unjustified assumptions made about the need to release an excessive amount land from the Green Belt for development. These matters need to be addressed in an Inspector-led discussion on this matter.

Please also see our representations on Policy SP 2, Chapter 5 on Housing Targets.

**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**