

# 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 10
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.)

Policy SADM 10 and the text in paragraphs 10.7 and 10.14, and unsound because they are not justified and are not consistent with the NPPF.

Policy SADM 10 includes Site SDS5 which our separate representations seek to have removed from the Plan, because the exceptional circumstances do not exist for this development in the Green Belt.

SADM 10 'iii' is unsound because there is no justification for resisting the change of use or redevelopment of all employment sites in the borough in the face of a much greater need for alternative uses, including housing, where this would otherwise be consistent with planning policy.

SADM 10 'v' the third criterion is not justified if the proposal before the Council is otherwise acceptable in the context of national planning policy.

Paragraph 10.7 is unsound because the justification for the scale of employment growth has not been set out given the consequences of this level of provision for the Green Belt, and the reasonable alternative of the use of more of the existing employment land for housing

Paragraph 10.4 is in effect a blanket policy that is seeking to prevent alternative uses of employment land for which there may be little or no demand and which in land use terms may be able to contribute to housing demand. The text is therefore unsound as the wording is unjustified.

## 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.)

SDS 5 should be deleted from Policy SADM 10.

The level of employment land provision should be reduced to reflect the borough's Green Belt location, and the wording changed to facilitate changes of use and redevelopment of appropriate older employment sites for housing.

Criteria 'iii' and 'v' in SADM 10 should be deleted.

A less stringent test should be set out in paragraph 10.14 to reflect the above amendments.

**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 in an Inspector-led discussion about the relationship between employment land provision and housing land supply because of the consequences of these for development in the Green Belt.

**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**