

Welwyn Hatfield Council Draft Local Plan Proposed Pre-Submission

Representation

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 21
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	<input checked="" type="checkbox"/>

If no, is this because it is NOT (please select all that apply):

Positively prepared	
Justified	<input checked="" type="checkbox"/>
Effective	
Consistent with national policy	<input checked="" type="checkbox"/>

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 sites SDS2 (WGC5) and HS2 (WGC1) 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 these sites would have a significant adverse impact on at least three, and potentially four of the stated purposes of the Green Belt in each case. They are therefore both unsound in that they are 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 19 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.)

Sites SDS2 and HS2 should be deleted from the schedule in SADM 21, consequential amendments made to Table 9, and the deletion of Policy SP 19, the text of the Plan from 14.38 to 14.42, and Figure 12.

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

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 : 24 October 2016