

# 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:	24.1 – 24.5
Policy Number:	SADM 35
Policies Map Number or Inset Map Name:	
Table Number:	18
Figure Number:	16

### 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	X
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 SDS6 (Hat15) from the Green Belt is not:

- justified by evidence of exceptional circumstances that would outweigh the very significant impacts on the Green Belt;
- effective in meeting the Plan's policy to protect the Green Belt and its objective to promote sustainable development; or
- consistent with national planning policy as set out in the NPPF.

The first and third criteria above are requirements of paragraph 83 of the NPPF.

The fundamental flaw in the proposal is that it is based on meeting an amount of housing development set out in 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). We consider that a significantly reduced target would remove the pressure for the release of large unsustainable developments as proposed at Symondshyde.

Development of this site would have a significant adverse impact on four of the stated purposes of the Green Belt, making it unsound in that it is not consistent with national Planning policy as set out in the NPPF for the protection of the Green Belt.

(A detailed explanation of our objections to Policy SADM 35 is set out in our representations on Policy SP 24 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 SDS6 (Hat15) should be deleted from SADM 35, together with Policy SP 24, and the whole of section 24 of the Plan from paragraph 24.1 including 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 explain the specific adverse consequences of the removal of the site from the Green Belt, and the wider implications of this in the context of the Council's excessive housing target, and believe that these matters need to be addressed in an Inspector-led discussion of the proposal.

**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**