

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:	SP 24
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	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.)

Policy SP 24 sets out the specific proposal for a new village at Symondshyde.

The proposal for a new village at Symondshyde is not sound, because it is not justified, would not be effective, and is not consistent with national planning policy as set out in the NPPF.

Paragraph 6.2 of the Plan states that “Green Belt boundaries in the borough have been altered, where exceptional circumstances existed, through this Plan.” Policy SP3 then goes on to identify Symondshyde, which is in the Green Belt, as the location for a new village.

What constitute the ‘exceptional circumstances’ for altering Green Belt boundaries in this location is only referred to in general terms, in paragraph 5.7 of the Plan. In our view this does not amount to an adequate demonstration of exceptional circumstances, particularly in the case of Symondshyde.

Paragraph 6.3 makes a very strong statement in support of Green Belt policy: The continuing maintenance of the general extent of the Green Belt, keeping land permanently open, preventing urban sprawl and neighbouring towns and villages from merging into one another, safeguarding the countryside from encroachment, preserving the setting and special character of historic towns and assisting urban regeneration by encouraging the recycling of urban land are key local priorities.

We strongly support this statement, which accords with national policy. It is clear from the material used to support the Plan that the Council has not used these priorities when it decided to allocate the land at Symondshyde for a new settlement.

The conclusion by the Council’s own Green Belt consultants was that the site makes a significant contribution to two of the purposes of the Green Belt and a significant contribution to the local purpose of maintaining the existing settlement pattern. These purposes are additional to the purpose to encourage regeneration and development within existing settlements and beyond the Green Belt, which the proposal would undermine by facilitating totally Greenfield development.

Even if the principle of development in the Green Belt were acceptable, which we dispute in our representations on Policy SP2, the locations selected for such development should respect the key criteria in planning practice guidance, which include the existence of defensible permanent boundaries. Site SDS6 is not such a site - the south-eastern boundary towards Hatfield overlooks the large, gently sloping open area between the site and Coopers Green Lane, where there are no significant features that would provide a strong, defensible boundary to the Green Belt.

Even more seriously, there would be a serious risk of the effective merging of the site with the proposed development of 1,650 dwellings at SDS5, as proposed in Policy SP 22, at least in visual terms, contrary to the purpose of preventing such merging.

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 reference to Site SDS6 (Hat15) should be deleted from the Plan.

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 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)

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 : 24th October 2016