

# 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 3
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 SP 3, table 2, and the supporting text in paragraph 6.2, 6.5 and 6.8 is unsound, in that they include provisions that are unjustified and contrary to the NPPF.

Paragraph 6.2 states that the Green Belt boundaries have been changed to make sure that sufficient land is available to meet the borough's needs, but this is not an 'exceptional circumstance' for doing this, as repeatedly stated in government policy, and no such circumstances are described in this paragraph, in any text referred to by cross-reference, or in the site-specific sections of the Plan.

The proposal in Policy SP 3 and paragraph 6.5 for a new village at Symondshyde has not been justified by exceptional circumstances and is inconsistent with the NPPF. Please see our separate representations on Policy SP 22.

The 5<sup>th</sup> paragraph of SP 3 refers to 'disproportionate' growth, which must be defined, preferably with reference to a percentage increase in population, dwellings or built-up area, in order to ensure consistency of approach, and the percentage should be the subject of consultation, possibly as a main modification to the Plan.

Table 2 sets out the capacities of settlements including for development in the Green Belt. None of these figures is sound because they are all based on the excessive housing target set out in Policy SP 2, which is itself unsound.

Furthermore the capacities significantly underestimate the capacity of existing settlements, particularly in terms of windfalls and permitted changes of use, that are likely to justify higher estimates of current capacity and reduce the need for development in the Green Belt.

CPRE Hertfordshire also considers that the Council's proposed housing densities are too low, and should set much higher density criteria in order to optimise the contribution to housing supply in appropriate locations in order to reduce pressure for the release of Green Belt for development.

Paragraph 6.8, for example, specifically excludes all residential gardens from windfalls, despite the fact that such gardens in non built-up areas are previously-developed land as defined in the NPPF. Please also see representations on Policy SADM 1.

## 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.)

Paragraph 6.2 should be amended to cross-refer to a revised housing target, and the exceptional circumstances that exist for the removal of land from the Green Belt following the setting of a revised lower target, and reconsideration of individual sites and the findings of the Green Belt Review.

All references to a new village at Symondshyde should be deleted, and amendments made to the figures in Table 2 to reflect a review of settlement capacities that better reflect current national planning policy and regulations.

A definition for 'disproportionate growth' should be provided for consultation by the Council.

Paragraph 6.8 should be amended to reflect NPPF policy for windfalls and previously developed land.

**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 its concerns about the relationship between the release of land from the Green Belt, and housing supply capacity, and considers that this needs to be addressed in an Inspector-led discussion of this matter.

**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**