

Welwyn Hatfield Local Plan

CPRE Hertfordshire's response –

Welwyn Hatfield Local Plan Regulation 18 Consultation Document

February 2026

Our point of view

CPRE Hertfordshire believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan.

CPRE Hertfordshire believes that planning is crucial to empowering local communities and making sustainable, liveable places. Ensuring everyone has an affordable home that meets their needs is essential to that, both in town and country.

Equally, it is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better protection in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily.

More new homes are undeniably needed and there is plenty of scope to meet this need without allocating for development new sites in the countryside. We want all local planning authorities including Welwyn Hatfield to:

- make maximum use of redevelopment opportunities on previously developed urban land (i.e., “brownfield”),
- ensure existing planning consents are followed up and fully built out,
- bring long-term empty homes back into residential occupancy, and
- take full advantage of the opportunities for commercial-to-residential conversions because of ongoing changes in working practices.

Our concerns

We have several concerns about the proposed “Regulation 18 Consultation Document” which are discussed below.

Public consultation and the requirements of Regulation 18 of the Local Plan Regulations

Regulation 18 of the Local Plan Regulations 2012 envisages that public consultation at this stage of the Local Plan preparation process constitutes responses to the Draft Local Plan as a whole. In fact, the Council, on its website portal on the Local Plan consultation, identifies the full document as the 'Draft Local Plan' on the weblink but as a 'Consultation Document' on the title page of the document itself with many of the topics unresolved.

Further, under the heading 'Drop-in sessions' on the consultation portal, referring to opportunities for the public to respond, the Council notes:

"At this stage, the document is high level, and seeks views on the overall approach for the emerging Local Plan..... and any additional considerations that should inform the development of a more detailed Local Plan anticipated later in the year".

This is misleading, as Regulation 18 is by common practice the opportunity for the public to respond to a full Draft Local Plan. Our serious concern is that the Council will progress to a Regulation 19 consultation at the next stage when the content of the Local Plan cannot be challenged prior to Examination in Public.

The Council should clarify that a further Regulation 18 consultation will take place as there is significant uncertainty regarding policies and proposals in key areas of concern. For example, figures for future housing sites are merely listed and it is not possible to correlate them with when they are being planned for. Also, insufficient information is presented for the proposed "reasonable alternative sites" that could comprise allocations for development.

Challenges and opportunities and direction of travel of the Local Plan

It is clear from the Consultation Document that Welwyn Hatfield Council is pursuing an economic growth agenda which is seen as beneficial in economic and social terms, and policies and proposals for land allocation are presented in term of opportunities for further development, effectively without major constraint. Considerable areas of land on 36 specified sites within the Green Belt are proposed for potential allocation for development of various kinds, often ignoring critical environmental implications.

The fact that virtually all the open countryside in the Borough is designated as Green Belt to be protected is not identified in the Consultation Document as a positive attribute or opportunity for Welwyn Hatfield, rather it is seen as a constraint to be overcome. This is clearly intentional and effectively ignores the contribution that open countryside makes to the quality of life of residents, resulting in an imbalanced Local Plan.

It would be appropriate for the ‘Living’ sub section in Section 1 to identify the protected countryside as an opportunity to maintain and enhance the environmental qualities which make Welwyn Hatfield an attractive and successful place for residents, businesses and visitors. In fact, the sub section merely comments on population numbers and characteristics, house prices and delivery and the presence of cultural and community facilities.

Similarly, the ‘Environment’ sub section identifies the Green Belt as a constraint to development, without identifying the value of the countryside, and the contribution it makes to mental and physical health and well-being, as well as the potential economic benefits of agriculture and other rural uses and activities. This is a major omission in a comprehensive planning document.

Within the Challenges and Opportunities (Section 1), the sub section on “Meeting the Borough’s housing needs” notes “A Ten-Year approach to Allocations” with three bullet points from the National Planning Policy Framework (NPPF) on the requirements for allocations for three five-year periods. It is accepted that this is a constraint on how the Council tackles land provision for housing, but subsequent sections do not provide clear indication of when allocations will be required, and we return to this issue below.

Vision and objectives

Following the omissions in Section 1, the Vision and Objections continue effectively to ignore the functions and potential use of the countryside other than for development, and this devalues significantly the legitimacy and relevance of the Local Plan as a whole. Sustainable development as identified in the National Planning Policy Framework (NPPF) requires the balanced consideration of economic, social and environmental objectives, and the emphasis on economic objectives and subsequent lack of detailed consideration of other issues jeopardises the soundness of the Plan.

Recent surveys emphasise the importance that the public gives to the countryside and its protection.¹ In concentrating almost totally on economic and growth objectives to the exclusion of the potential contribution and benefits of the countryside, the Draft Local Plan fails to respond to the concerns and aspirations of local communities.

¹ See the results of the recent poll by More in Common at <https://www.cpreherts.org.uk/news/86-of-britons-support-the-green-belt-new-poll-reveals/>

Lack of protection of the Green Belt as a Strategic Objective for the Local Plan

With regard to the largest component of countryside, the Green Belt, both the revised NPPF 2024 and the pending draft consultation NPPF repeatedly promote the five purposes of the Green Belt and restate its significance and permanence. This position is then profoundly challenged by the introduction of grey belt which is in practice an existential threat to the Green Belt on both plan-making and decision-taking. The implications of these issues are discussed further below, and they have severe consequences for local communities, businesses and visitors.

Most of Welwyn Hatfield outside the built-up areas is designated as Green Belt which also includes designated environmental sites which are key characteristics of the district and contribute greatly to the quality of life and well-being of residents. It appears that Green Belt land area of between 148 hectares (the total land area of the “new potential sites in Green Belt for consideration”) and up to 243 hectares (the total land area when the “reasonable alternative sites in Green Belt for consideration” are added in) could be lost to development through the proposed Local Plan. This will have a very significant damaging impact on the character and appearance of the Borough.

The fact that most open countryside in the Borough is designated as Green Belt is not identified in the Consultation Document as a positive attribute for Welwyn Hatfield, rather as a constraint to be overcome. This is clearly intentional and effectively ignores the contribution that open countryside makes to the quality of life of residents, resulting in an imbalanced Local Plan. A basic characteristic of the Green Belt is its permanence, and it is unacceptable that its protection is not regarded as a specific Strategic Objective for the Local Plan.

The revised NPPF 2024 and the new consultation NPPF repeatedly promote five purposes of the Green Belt and restate its significance and permanence. This position is then profoundly challenged by the introduction of grey belt which is in practice an existential threat to the Green Belt in both plan-making and decision-taking. The implications of these issues are discussed further below, and they have severe consequences for local communities, businesses and visitors.

Grey belt concerns

As already noted, the Consultation Document includes discussion of the grey belt, which was introduced in the revised NPPF 2024, and is subsequently elaborated in Planning Practice Guidance and the new draft NPPF presently being consulted on. The Draft Local Plan cites grey belt in policies relating to the removal of statutory protection for open countryside without specifying criteria for its selection.

This leaves a huge level of uncertainty with regard to how grey belt is to be defined on the ground. Recent experience in Hertfordshire and elsewhere shows that citing grey belt on a Green Belt site has a direct and immediate impact on the success of a planning application, notwithstanding the local conditions and circumstances.

Extending this to the preparation of Local Plans without further definition and elaboration with regard to how it is to be applied in practice is injurious to good planning practice and extremely damaging to the countryside. It downplays the significance of environmental constraints which should have the same weight as economic and social considerations.

Spatial strategy and policies

The first chapter of Section 2 seeks to indicate overall strategy for sustainable development in the Borough and establish a hierarchy of settlements to accommodate growth. Chapter 2, entitled “The Green Belt”, then presents local policies which restate NPPF policy and it is remarkable that in virtually every case of both policy statement and justification, the Green Belt is viewed as a constraint to be overcome, rather than an intrinsic positive characteristic to be protected and enhanced, other than in the most general terms.

The statement of “Welwyn Hatfield Objectives for good growth” following Policy SP1 is entirely superfluous, and Policy SP2 introduces a hierarchy of settlements which has two tiers entitled “The Green Belt” which is again a wholly inappropriate use of the statutory designation of land outside settlements.

At no point is the Green Belt identified as a land designation with policy for its protection and enhancement. Policy SP3 Welwyn Hatfield Green Corridor would provide a clear opportunity for such a policy but Green Belt is not even mentioned, other than in paragraph A. b) where the Government has severely limited the context in which coalescence can be considered as a constraint to large towns, and has excluded villages.

Overprovision of housing

It is stated frequently in the Draft Local Plan, and in public presentations, that it is a requirement for the Council to provide for housing need in full, as assessed by the Government formula (known as the ‘standard method’). This is despite local councils being legally responsible for the preparation of Local Plans including housing targets, but their autonomy is being increasingly heavily fettered by central government requirements.

We accept there is a need for more housing in Welwyn Hatfield as elsewhere, especially truly affordable housing for local people and key workers, but the “standard method” insisted on the

by the Government leads to grossly excessive theoretical housing needs for the Borough. The Council has also failed to take account of the NPPF as revised in December 2024 paragraph 11, footnote 7, which permits local planning authorities to restrict the scale of development due to planning constraints including protection of Green Belt and other designated areas and sites.

Recently, alternative interpretations of the NPPF related to the requirement to provide a supply of land for housing for five years and over-riding the ability to constrain development for protected land, has led to councils allocating protected land for housing, and planning inspectors to allow appeals on Green Belt. Welwyn Hatfield Council has also made this choice in allocating sites with huge implications for protected countryside in the Borough.

Further, as noted previously, the listing of potential sites for development in the Consultation Document is complex and does not enable correlation of potential sites to periods of implementation, leading to the possibility of an excessive number of sites being identified and losing their statutory protection. Further commentary with regard to allocations and justifications in Chapter 6 is noted below.

It is becoming increasingly apparent that, far from there being an imperative to provide more open countryside for development, there is no necessity for the quantum of land being proposed for allocation. The combination of existing unimplemented planning consents, more efficient and extensive use of previously developed land and presently empty houses provides at the very least a large proportion of the sites which are said to be required by the Government to solve the housing crisis.

The Institute for Public Policy Research (IPPR), an independent research organisation, published research in February 2025 showing that developers have secured planning permission for more than 1.4 million homes since 2007 (and more than 1.1 million homes between 2010 and 2020) that have not been built. Even if Welwyn Hatfield attracted only the average number of consents, this would mean that there are about 3500 houses in the Borough with planning permission that have not been built (assuming 420 local planning authorities which include 21 County Councils and three Development Corporations).

The Brownfield Land Register for Welwyn Hatfield identifies land for a minimum of 4,324 residential units, and government data analysed by the charity Action on Empty Homes shows that there are 532 long-term empty homes in the Borough. Brownfield Land Registers commonly significantly under-estimate the amount of land which could be developed. Taking these sources together (and subtracting the proposed site allocations for already identified 'brownfield sites') it is reasonable to conclude that there is significant additional land available which could reduce the need for the level of five-year housing land supply proposed and the pressure on protected open countryside.

CPRE Hertfordshire believes that it is the responsibility of Welwyn Hatfield Council to investigate thoroughly the above opportunities for the Local Plan rather than taking the easy option of

seeking greenfield sites to satisfy a theoretically derived housing need figure. The housing crisis claimed by the Government as the pretext for requiring large amounts of land to be allocated in Local Plans is complex and will not be solved by extensive allocation of additional sites.

It requires sophisticated measures dealing with affordability, finance and a wide range of supply side solutions, rather than the simplistic identification of open land for mainly private sector provided market housing. The lack of any consideration of these issues as they affect land use is a major weakness of the Consultation Document.

Allocations and alternative sites for consideration

Section 2 Chapter 6 Homes and Policy SP11 state at the outset the overall housing provision target of nearly 16,000 dwellings which equates to 840 new units per year, and we do not believe that figure is achievable in the present circumstances, as noted above. Section 3 then sets out the sites that the Council is considering for allocation in the Local Plan in three categories:

- Existing site allocations from the adopted Local Plan where development has not taken place
- New potential site allocations proposed to be introduced for this Local Plan
- A schedule of reasonable alternative sites (sic) that have been submitted and assessed.

There is unacceptable uncertainty with regard to the status of sites in the latter two categories which provokes concern from those local communities and residents affected. Site allocations for Tiers 1 to 3 of the settlement hierarchy introduced in Section 2 appear to be presented for the three categories of site noted above but in fact the tabulations are incomplete and do not provide a clear and comprehensive view of what is intended.

With regard to existing proposed residential sites, figures are only provided for Tier 1, Tier 2 and Tier 3 settlements and as expected, there are no Green Belt sites included in any category from existing site allocations in the adopted Local Plan. New potential allocations are presented for Tiers 1 and 2 and these include a total of 2069 units on Green Belt sites and 721 units on non-Green Belt sites.

No further potential site allocations from the adopted Local Plan are presented for Tiers 3 to 5 which include “Green Belt Villages” and “Small Green Belt Settlements”, nor are any further sites identified as “potential site allocations proposed for this Local Plan”. Rather, a separate tabulation entitled “Schedule of reasonable alternatives sites” is presented which includes all Green Belt sites for residential development for a total of 1566 dwellings for an unspecified period.

Given that detailed allocations only need to be provided for the first five years housing land supply, according to the NPPF, it appears that non-Green Belt sites could provide for comfortably

in excess of 840 units per year from existing allocated sites in the Local Plan although many issues will affect implementation. There is no discussion in the Consultation Document of the priority or phasing of the total number of units for which sites have been identified, which are significantly fewer than the 15960 units that the Council says it must provide for in the Local Plan.

The schedule of reasonable alternatives sites also does not specify their Green Belt status nor is any assessment undertaken of the conditions and circumstances affecting these sites. This makes it impossible to ascertain implications for local communities which are deeply concerned about their local surroundings, and jeopardises the soundness of the Plan.

The level of uncertainty regarding site allocations is in contrast to the level of detail provided by policies in Section 6 for subsidiary concerns relating to housing which would be more appropriately dealt with in supplementary planning documents rather than the strategic Local Plan. The treatment of the site allocations is confusing and unclear, and the housing trajectory presented in Appendix A is so sketchy as to be irrelevant.

Failure to address climate change, biodiversity, and nature

Welwyn Hatfield declared a Climate Emergency in 2019, and the Local Plan should be the key mechanism for the Council to implement the requirements of this declaration. We note the recognition of the need to ameliorate the impact of climate change through planning policy as noted in Chapter 3.

The Council should be defending rigorously the natural capital of the Borough area as a means of achieving this objective. Instead, it appears to be adopting a strategic approach which allows that capital to survive only when left behind by its economic growth agenda. Mitigation and adapting to climate change is not sufficiently central to the vision and strategic objectives.

This failing is not unique to Welwyn Hatfield Council, virtually no Local Plan in the country deals with these matters satisfactorily. However, Welwyn Hatfield, as a relatively prosperous area with high quality surroundings for the most part, should be taking a lead in pioneering policy and proposals to ameliorate the impacts and effects of climate change, loss of biodiversity and the protection of nature.

The Council has already identified the Green Corridor between Welwyn and Hatfield as a key element of the Draft Local Plan, but the Consultation Document lacks robust and progressive policy regarding its enhancement. This could include protection and enhancement of the Green Belt as required by the NPPF.

A particular lack in the Draft Local Plan is consideration and treatment of the internationally significant chalk streams which host globally rare fresh-water habitats and local ecosystems which are threatened. The River Mimram and the River Lea support diverse wildlife habitats and

should be recognised as key components of the Borough's natural environment for protection and improvement.

Chapter 11 The Natural Environment provides no specific policy guidance for chalk streams, and this is a serious omission. The NPPF recognises chalk streams as a priority habitat, and it is highly regrettable that the Draft Local Plan is silent on this topic.

Underestimation of the opportunities for regeneration and reuse of land

The reuse of previously developed land is considered mainly in terms of the release of Green Belt land and some urban sites. This greatly underestimates the likely changes which are already affecting town centres, out-of-town-centres retailing, and commercial uses more generally.

Projected social and economic trends are likely to create many more opportunities for the conversion of commercial and employment space to residential use. The expansion of permitted development rights which went into effect in 2020 further encourages conversion and change of use to residential purposes.

We believe the opportunities for reuse and redevelopment accorded by all these changes are not sufficiently considered in the Draft Local Plan. Evolving changes in the nature of work, and the form and function of workspaces, are also not considered sufficiently.

Infrastructure provision

Assessment of the infrastructure requirements in Chapter 12 for the proposed level of development is sketchy and completely inadequate for the level of development proposed. This relates to commercial as well as residential development, with specific concerns relating to power and water supplies required for new installations, including proposals for data centres and large-scale business premises.

A total of three pages is devoted to this crucial topic in the Draft Local Plan, and this is highly inappropriate for an area which is under increasing pressure for development. We note the policy and proposals for Sustainable Travel (Chapter 5), but policy and proposals are necessary to tackle existing and growing pressures on rural road networks.

There is one mention of the Council's Infrastructure Development Plan in Chapter 12 and no indication of the coordination of development with infrastructure provision during the period of the Local Plan. This is a major omission which affects the credibility and feasibility of Local Plan policies and further work should relate necessary infrastructure provision to development priorities.

Water and waste utilities

We have significant concerns regarding both clean water supply and waste-water processing and disposal. The Government has identified southeastern England and eastern England, including

all of Hertfordshire, as the most water-stressed areas in the UK and the Draft Local Plan fails to address this issue which is likely to become even more significant in the future.

Thames Water waste-water facilities are already at capacity in many parts of the County, including Welwyn and Hatfield. Thames Water responses, as a statutory consultee to major planning applications, are identifying capacity constraints for proposed development which are not being addressed.

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Standing up for Hertfordshire's countryside