



**WELWYN
HATFIELD**

Local Plan
Publication Stage Representation
Form

Ref:

**(For
official
use only)**

**Name of the Local Plan to which this
representation relates:**

Welwyn Hatfield Borough
Council

**Please return to Welwyn Hatfield Council (localplanconsultation@welhat.gov.uk
BY 18:00/ 05 November/2026**

Please note that your comments, including your name, will be made publicly available as part of the consultation record. Personal contact details will not be published, and your data will be held in line with the Council's data protection policies.

This form has two parts –

Part A – Personal Details: **need only be completed once.**

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Mr

First Name

Chris

Last Name

Berry

Job Title

(where relevant)

Planning Manager

Organisation

(where relevant)

CPRE Hertfordshire

Address Line 1

31a Church Street

Line 2

Welwyn

Line 3

Hertfordshire

Line 4

Post Code

AL6 9LW

Telephone Number

01438 717587

E-mail Address
(where relevant)

planning@cpreherts.org.uk

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

SP1:
Sustainable
Development

Site
Allocation
Reference

Policies Map (State the Designation) _____

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

Please mark 'x' as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

Policy SP1 is not coherent as drafted. Text and numbering do not relate to each other and in any case, the policy is a simple re-statement of objectives already presented previously. 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 by the Government leads to grossly excessive theoretical housing needs for the Borough. 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) 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 housing 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). CPRE research has also identified sufficient brownfield land for 1.54 million dwellings nationally (<https://www.cpreherts.org.uk/news/brownfield-land-for-1-54m-new-homes-in-england-and-26779-in-hertfordshire/>)

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 Draft Local Plan and renders it unsound.

(expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Redrafting the policy for coherence and additional material regarding the factors affecting existing housing provision to provide a more balanced consideration of sustainable development including a review of housing requirements and more efficient use of previously developed land to allow an overall reduction in the quantum of land being proposed for allocation on greenfield sites.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes

I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. Please indicate whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination

☒

The publication of the person appointed to carry out independent examination

☒

The adoption of the Local Plan

☒

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To explain CPRE Hertfordshire concerns relating to the above matters in order to ensure that full consideration is given to balancing countryside and environmental issues when assessing housing requirements and sustainable development, including maximising use of previously developed land.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.