

ST ALBANS CITY AND DISTRICT COUNCIL

<u>REPORT TO :</u>	Planning Policy Committee
<u>DATE :</u>	11 October 2016
<u>REPORT TITLE :</u>	Welwyn Hatfield Local Plan Publication / Submission (Regulation 19) Consultation – Response
<u>WARDS :</u>	All
<u>PORTFOLIO HOLDER:</u>	Cllr Daly, Portfolio Holder for Planning and Conservation
<u>CONTACT OFFICER :</u>	Tracy Harvey, Head of Planning and Building Control

1.0 **Purpose Of Report**

- 1.1 To agree the Council's response to the consultation.

2.0 **Recommendation**

- 2.1 That the Committee advises the Head of Planning & Building Control (HPBC) to respond to the Plan consultation as set out in Appendix 3 to this the report.
- 2.2 That the HPBC / PH take forward council to council liaison and explore the issues noted in this report.

3.0 **Background Information**

- 3.1 Welwyn Hatfield Borough Council (WHBC) is currently consulting on its Submission (Publication) Draft (Local Plans Regulation 19) Welwyn Hatfield Borough Council Local Plan (closing date 24 October).
- 3.2 Full details of the consultation documents are at the web link in the Background Documents section. Some key extracts (Key Diagram and Plan of Symondshyde new village proposal) are reproduced at Appendix 1 to this Report.
- 3.3 The next stage in the process is submission to the Secretary of State and examination. Any comments made at this stage will therefore need to be considered in both formal Duty to Cooperate liaison (Herts Planning Group (HPG – officer) / Herts Infrastructure Planning Partnership (HIPP – Member level), informal Council to Council liaison meetings and at any Examination.
- 3.4 The Council made comments on earlier Consultation Draft (Regulation 18) Plan (see Appendix 2). It is good to see that some of those comments have clearly been taken into account (see supporting representations below).

- 3.5 The Submission (Publication) Draft Plan has however changed substantially from that put forward at consultation stage. Significantly higher levels of development are proposed with inevitable Green Belt impacts. Of particular interest and note is the new proposal for a 1,130 dwelling new 'village' at Symondshyde, close to the District boundary (see objecting representations below and extracts from the Plan Appendix 1).
- 3.6 The changes mean that it has been necessary to look afresh at the whole Plan. As well as the development proposals that impact on the District there are some strategic issues that relate closely to progress on this Council's (the abbreviation SADC is used for the Council in the representation wording below) Strategic Local Plan (SLP).
- 3.7 Councillors will be aware that WHBC made strong objecting representations on the SLP. Those representations now form part of the SLP examination process.
- 3.8 WHBC made representations that it considers that SADC has not satisfied the legal requirements of the Localism Act 2011 'Duty to Cooperate' (DtC) and that the SLP is unsound (principally on assessment of development need and the Plan target for housing). Full details of the WHBC view on the SLP are available in the web links in the Background Documents Section.
- 3.9 The nature of WHBC's representations on the SLP raises cross boundary strategic issues for this Council. These representations should be considered with WHBC under established DtC liaison arrangements before their Plan proceeds to Examination.
- 3.10 The most recent DtC meeting of the respective Portfolio Holders took place on 1 February 2016.

4.0 **Analysis and Findings**

- 4.1 Appendix 3 presents the draft recommended representations. They are organised in a format to reflect Local Plan procedural requirements for representations at this stage of the process. This means that in each case the relevant Plan Policy / text section reference is identified. In addition, the Council will need to state whether, and why, it supports / objects on DtC / soundness points. The finally agreed representations will be transferred to standard forms reflecting this form of presentation.

5.0 **Conclusion**

- 5.1 The consultation raises important issues for this Council. The recommended representations will need to be pursued both in DtC discussions and Examination.

6.0 **Implications**

Issue	Yes/No	Reference
Vision and Corporate Priorities	Yes	Whole report relates to planning for

		the future and strategic cross boundary planning issues in the sub - region
Policy	Yes	As for vision and priorities above. Particular strategic cross boundary issues arise for Development Plan DtC requirements and related progress on the SLP
Financial	No	
Impact on the community	Yes	As for vision and priorities above
Legal and Property	No	
HR/Workforce	No	
Risk Assessment	No	
Environmental Sustainability	Yes	As for vision and priorities above

7.0 **Further Information/Appendices**

7.1 Appendix 1 - Extracts from WHDC Local Plan (key Diagram)

7.2 Appendix 2 - Comments made on the WHBC Local Plan at Regulation 18 Consultation Draft Stage

8.0 **Background Papers - Local Government (Access to Information) Act 1985**

<u>Bibliography</u>	<u>Custodian</u>	<u>File Location</u>
WHBC Submission (Publication) Local Plan consultation	WHBC	http://www.welhat.gov.uk/localplan
Past Planning Policy Committee Reports / Minutes (For general DtC position)	John Hoad x 2569	St Albans City & District Council - Browse meetings - Planning Policy Committee
Analysis of representations on Publication Draft SLP (see pages WHBC views)	John Hoad x 2569	SLP Consultation Report - Publication Stage

WHBC Local Plan - Extracts

Figure 6 Welwyn Hatfield Key Diagram

The diagram illustrates the geographical layout of the Welwyn Hatfield area, highlighting the Green Belt and various infrastructure. Key features include:

- Green Belt:** Shaded in light green, covering most of the area.
- Towns:** Shaded in pink, including Welwyn, Hatfield, and Welwyn Garden City.
- Excluded Villages:** Shaded in light pink, including Woolmer Green, Oaklands & Mardley Heath, Digswell, Welham Green, Brookmans Park, and Cuffley.
- Villages:** Marked with black dots, including Ayot St Lawrence, Ayot St Peter, Ayot Green, Lemsford, Stanborough, Essendon, Woodside, Wildhill, Bell Bar, Water End, Swanley Bar, Little Heath, Northaw, and Newgate Street.
- Significant Green Infrastructure:** Shaded in light green with a dotted pattern, including the River Mimram, River Lea, and River Colne.
- Strategic Green Links:** Indicated by green arrows.
- Strategic Green Corridor:** Indicated by a green double-headed arrow.
- Strategic Site – Housing:** Shaded in orange.
- Strategic Site – Mixed Use:** Shaded in blue.
- Motorway:** Indicated by a thick red line (M25).
- Road:** Indicated by a thin red line.
- Railway:** Indicated by a black line with cross-ticks.
- River:** Indicated by a blue line.
- Borough Boundary:** Indicated by a black line.
- Town Centre:** Indicated by a black circle.

The map also shows the following districts and boroughs:

- North Hertfordshire District
- St Albans District
- East Hertfordshire District
- Broxbourne Borough
- Hertsmere Borough
- London Borough of Enfield

Key roads and routes include:

- A1(M)
- A414
- A1000
- B656
- B197
- B195
- B1600
- B157
- B156
- M25

Key locations and features include:

- Coopers Green Lane
- Water End
- Swanley Bar
- Little Heath
- Northaw
- Newgate Street
- Essendon
- Woodside
- Wildhill
- Bell Bar
- Brookmans Park
- Welham Green
- Stanborough
- Lemsford
- Ayot Green
- Ayot St Peter
- Ayot St Lawrence
- Woolmer Green
- Oaklands & Mardley Heath
- Digswell
- Welwyn Garden City
- Welwyn
- Hatfield

Key directions and routes include:

- To Cambridge
- To Hitchin, Stevenage & Letchworth Garden City
- To Hertford, Harlow, Cambridge
- To Hertford
- To St Albans
- To London

Figure 16
SDS6 (HAT15)
Symondshyde
New Village



Appendix 2

Comments made on the WHBC Local Plan at Regulation 18 Consultation Draft Stage

Dear Mrs Tiley,

RE: Welwyn Hatfield Borough Council Local Plan Consultation January 2015

Thank you for consulting St Albans City and District Council on the Welwyn Hatfield Local Plan Consultation 2015.

This Council has considered the consultation. The Council has also considered its previous response to the last consultation in January 2013. It makes the following comments.

CS2 Meeting the needs for growth / housing and housing target

As already raised in discussions between the authorities, St Albans does not fully understand the basis of the WHBC SHMA, Housing Market Area and Policy intention CS2. This Council raises concerns about the nature of the WHBC SHMA, particularly with reference to how the needs identified for the whole market area appears to have been apportioned between sub areas. As agreed during recent Member level meetings, further officer discussions to clarify the position are underway. We welcome further discussions to clarify the approach.

The Welwyn Hatfield Local Plan consultation sets out that a new SHMA has been undertaken which identifies WHBC's Housing Market Area covering parts of neighbouring authority areas including St Albans. It is noted at paragraph 3.3 that the WHBC's SHMA concluded a need for housing within the Borough of 625 per annum (12,500 between 2011 and 2031). Further to this paragraph 3.3 notes that the Borough's need for housing represents 48% of the total need arising within the defined WHBC Housing Market Area (1,290 p/a, 25,800 between 2011 and 2031). Moving forward, it is suggested that the paragraph should reflect the analysis within the WHBC SHMA at paragraph 9.107 which states that "This figure should be treated with considerable caution, given the assumptions used in order to derive it. Equally it is not the intention through this analysis to call into question any OAN assessment of other authorities in the HMA, but rather to illustrate the scale of need at this geographical level."

Green Belt

Releasing land from the Green Belt still remains a fundamental aspect of the WHBC strategy to meet identified growth. Welwyn Hatfield have undertaken a Green Belt review and allocated sites in the draft Local Plan, however the rationale/process behind how the site recommendations from the Green Belt Review have been categorised as "more favourable", "finely balanced" and "less favourable", and subsequently included in the Local Plan Consultation is unclear. It appears to be set out in the short narrative sections next to each site in the consultation Document. This Council welcomes further clarification on this point and draws attention to the detailed site assessment work undertaken to support the St Albans draft Strategic Local Plan Consultation 2014 as a useful reference source.

Clarification seems particularly necessary with regard to HAT2 in relation to how this area was considered by SKM in their Green Belt work. This joint work with this Council, carried out by independent consultants, identified the “Strategic Gap” between St Albans and Hatfield at this point as vulnerable. It concluded that the gap has a significant role in preventing neighbouring towns from merging and assisting in safeguarding the countryside.

Proposed development locations

CS3 Settlement Strategy / Distribution

The distribution of development has altered since the Emerging Core Strategy consultation. It has been amended to now partially reflect the existing settlement hierarchy; the distribution has been apportioned on the basis of the number of households in each settlement within the Borough. There is however a continued primary focus in and around the two towns of Welwyn Garden City and Hatfield.

It appears that WHBC are unable to meet the identified growth needs of 12,500. Table 1, page 21, indicates that there is total potential capacity for 10,152. This suggests that in the future there will be consideration of the “finely balanced” and possibly the “less favourable” sites for inclusion in the WHBC Local Plan.

This Council remains concerned about the overall longer term proposals and potential proposals to the west and north west of Hatfield. There are concerns regarding over concentration and infrastructure impacts of development to the west and north west of Hatfield. For this reason this Council has considerable concerns over the impact on St Albans District that may arise from HAT1 and HAT2; and from the possible future inclusion of HAT3, 4 and 5 in a revised WHBC Local Plan.

HAT 1 – North West Hatfield

The extent of this allocation has reduced by pulling back the eastern extent in line with Green Lane reducing the overall estimated capacity of from 2,000 in the WHBC Emerging Core Strategy 2012 consultation to 1,350 in this current consultation. Development in this location will have an effect on the transport infrastructure not only on the A1(M) but on roads in St Albans. Currently routes to and from Junction 4 of the A1(M) extending towards St Albans are already congested at peak times. This junction provides the main access to the A1(M) for Harpenden, Redbourn and Wheathampstead. Further development close to this A1(M) junction would exacerbate existing traffic issues. This impact is reinforced in the consultation document, “Transport modelling has tested higher levels of growth in this location. This indicated that additional stress would be placed on the A1(M) and nearby junctions at peak times which would need to be addressed with a series of measures to improve traffic flow as well as investment in sustainable transport measures.”, with little indication of what could be considered as appropriate solutions.

Whilst noting the reduction in size and consequently in the scale of some impacts, this Council therefore still has significant concerns about this allocation.

HAT 2 – West Hatfield

The WHBC Emerging Core Strategy 2012 identified this site as safeguarded land for future growth beyond 2029. The current consultation states that WHBC propose reducing the size of the site slightly as shown in Figure 19, to deliver more of the Country park and reduce impact on the adjoining wildlife site. However when comparing the boundaries depicted in Figure 19 of this consultation and those within the previous consultation, the size of the site has not been reduced to a significant degree.

Ellenbrook Fields Country Park is an important piece of strategic green infrastructure in both Welwyn & Hatfield Borough and St Albans District. The allocation forms part of the Ellenbrook Fields Country Park which forms part of a S106 agreement for the Hatfield Aerodrome redevelopment. SADC, WHBC and the County Council have jointly signed up to improve the existing public access to the country park on this land as part of that agreement.

Given the significant issues raised by WHBC in the assessment of suitability for this site supporting the previous consultation, namely: creation of an artificial Green Belt boundary, the likely adverse effects on the quality, open character and value of the area, its poor relationship to Hatfield and existing development, and transport impact, this Council is unclear as to why this site has been taken forward and now included as a proposal in the WHBC Local Plan alongside HAT1. The Land for Housing Outside Urban Areas, supporting document to the WHBC Emerging Core Strategy Consultation 2012, concluded that “There are significant issues that make this site less suitable than other options for development during the plan period. If it were to come forward in conjunction with HAT1 it would be very likely to place an unacceptable strain on the highway network. These issues would need to be overcome in order for this site to come forward for development. This site is only considered to be suitable as Safeguarded Land for development beyond the plan period.”

The western boundary presented in the consultation document for this site does not follow a boundary which is clearly defined by a readily recognisable, permanent and physical feature, as set out in the NPPF at paragraph 85. It is considered that there is no reasonable boundary westwards beyond the very significant physical permanent feature of the Ellenbrook.

The deliverability of HAT 2 is also unclear given the substantial mineral reserves and length of time required to extract these before land would become available for development.

This Council therefore has very significant concerns with regard to the HAT 2 allocation.

Finely balanced sites

HAT1 Remainder & HAT2 Remainder

The comments with regard to HAT1 and HAT2 above should be taken into account in consideration of these remaining parts of the wider sites.

Based on the evidence this Council has seen and the concerns raised above, this Council considers that HAT1 Remainder and HAT2 Remainder sites should not be categorised as “finely balanced” but should be categorised as “less favourable” and should not be taken forward.

HAT 4 – South of Ellenbrook

This Council agrees with WHBC’s conclusion not to take this site forward. However, in the absence of a detailed assessment, this council does not agree that this site should be categorised as “finely balanced”.

It is unclear how this site has been categorised as “finely balanced” given the narrative in this consultation and the conclusions reached in the assessment included in the Land for Housing Outside Urban Areas 2012:

Local Plan consultation

A.8 The site lies within a narrow, fragile gap between St Albans and Hatfield which would be further reduced and contributes to the national and local Green Belt purpose. Access to the site would be across flood zones 2 and 3 so a level 2 Strategic Flood Risk Assessment (SFRA) would be required.

Land for Housing Outside Urban Areas 2012

Designations and Constraints	Site is within the Green Belt. Majority of the site is classified as Grade 2 Agricultural Land. It falls within the Watling Chase Community Forest policy designation. Listed Buildings close to north/north east of the site on Wilkins Green Lane.
Assessment of Suitability and Availability	This site has an estimated capacity for 155 dwellings. This location would be severed from Hatfield by the A414 and A1(M) and there are known highway constraints with access from the A414. Development on this site would have poor accessibility to schools, shops or GP services. The site is adjacent to the Alban Way Cycle Route. The landscape in this area has been assessed as having medium sensitivity to change and medium capacity to accommodate change. There are sewerage capacity problems in this area, so upgrades will be required. Also, local primary schools are at capacity so this matter would have to be addressed as part of any development proposal.
Measures required to address and mitigate impacts	Development here would need to address issues of sewerage capacity and primary school capacity A sustainable transport strategy would be needed to offset the increase in car journeys and poor public transport links.
Conclusion	Land in this location is not considered suitable to take forward.

This Council considers that development of HAT4 would considerably shorten a vulnerable, narrow strategic Green Belt gap between Hatfield and St Albans. This Council considers that it should not be taken forward.

HAT 5 – North of Roehyde

As above, this Council is unclear why this site has been categorised as “finely balanced” given the conclusions in the assessment included in the Land for Housing Outside Urban Areas 2012:

Land for Housing Outside Urban Areas 2012

Designations and Constraints	Site is within the Green Belt. Majority of site is classified as Grade 2 Agricultural Land. The south west boundary of the site abuts a Wildlife Site and the south east boundary is covered by Flood Zones 2 and 3. It falls within the Watling Chase Community Forest policy designation.
Assessment of Suitability and Availability	Development in this location (with an estimated capacity for 370 dwellings) would be severed from Hatfield by the A414 and A1(M). There are known highway constraints with access from the A414. Development in this location would have poor accessibility to schools, shops and GP services. The site is adjacent to the Alban Way Cycle Route. The landscape in this area has been assessed as having medium sensitivity to change and medium capacity to accommodate change. There are sewerage capacity problems in this area.. Local primary schools are at capacity so this matter would have to be addressed as part of any development proposal. The southern edge of Hat5 is unsuitable for development as it is designated as flood zone 3. Landowner also considers the site is suitable for employment uses.
Measures required to address and mitigate impacts	Measures would need to be taken to protect the adjacent Ellen Brook and to avoid development in areas in Flood Zones 2 and 3. Majority of site could incorporate SUDs to control the quality and quantity of surface water run-off. Development here would need to address issues of sewerage capacity and primary school capacity. A sustainable transport strategy would be needed to offset the increase in car journeys and poor public transport links.
Conclusion	Land in this location is not considered suitable to take forward.

This Council considers that it should not be taken forward.

Less Favourable

HAT 3 - West of Ellenbrook

HAT3 was previously considered as a possible urban extension and fell partly within St Albans District. This Council is supportive of categorising this site as “less favourable” given that “Development of the site would considerably shorten a vulnerable, narrow strategic Green Belt gap between Hatfield and St Albans.”

As reflected in this Council’s response in 2013, it still considers that “The distinctive nature of rural settlements, such as Smallford and Colney Heath, and their distinctive character need to be protected”.

This Council supports the categorisation of this site as less favourable and on the basis of the evidence available this site should not be taken forward.

HAT12 – Nast Hyde Farm

It is unclear whether this is an additional site included for consideration since the 2012 consultation as site references do not appear to correlate. The Council supports WHBC's conclusion that "Development of the site would considerably shorten a vulnerable, narrow strategic Green Belt gap between Hatfield and St Albans..."

This council does not agree with the suggestion that if HAT4 were to come forward that this site could potentially come forward in combination with it.

This Council supports the categorisation of this site as less favourable and on the basis of the evidence available that this site should not be taken forward.

Infrastructure

There are likely to be considerable infrastructure impacts on St Albans District from these proposals, most notably related to transport and school provision. The Welwyn Hatfield Infrastructure Delivery Plan 2015 identifies junction improvements. It is understood that some transport modelling work around the A1(M) may have been undertaken however it is unclear whether impacts on the local roads have been modelled. In particular impacts upon the A414, A1057, Coopers Green Lane, B653 will need to be considered and identified.

Furthermore the cumulative impact of the Secretary of State's approval of the Radlett 'rail' freight interchange in St Albans and the Welwyn Hatfield proposals on the transport network in St Albans and the wider area needs to be taken into account.

Strategic Green Infrastructure

Notwithstanding the above comments with regard to HAT2, this Council welcomes the opportunity to create a network of connected green open spaces, broadly as outlined in paragraphs 7.1, 7.2 and 7.4 and figure 2 in the WHBC Local Plan Consultation document. The Council welcomes further discussions and co-operation on this particular aspect of the WHBC Local Plan in the future.

Ongoing Cooperation

This Council is happy to confirm our on-going commitment to discussions and working together.

Yours sincerely



Christopher Briggs
Spatial Planning Manager
St Albans City and District Council

Appendix 3

Draft recommended representations.

Representation 1 (Objecting – Duty to Cooperate as a soundness issue (not DtC as a matter of legal compliance))

The soundness requirement for DtC has not been met because SADC, and potentially other affected LPAs, were not appropriately involved in agreeing the market / functional area basis for the Plan, consequent development needs assessment, consideration of options before the Plan was published and, crucially, follow through on the joint Green Belt review (undertaken by WHBC with SADC and Dacorum BC)

Plan sound? No (not justified / not consistent with national policy)

Yes, wish to take part in examination hearing

References: applies to whole Plan (but especially reference: Para Nos 2.42 – 2.46)

Supporting points:

- It is not clear what joint work is referred to in ‘commissioning or sharing of evidence’. Conclusions arising and implications for the Plan have not been agreed, or even discussed, with SADC. Strategic cross boundary issues arising from the now proposed levels of development have certainly not been considered through the established Herts planning Group (HPG) / Herts Infrastructure and Investment Partnership (HIPP) arrangements, or through joint LPA inputs to the Local Enterprise Partnership Strategic Economic Plan (LEP SEP). They have not even been raised or discussed in direct Council to Council DtC meetings. In particular it is not clear if and how the LEP SEP has influenced the Plan.*
- It is not clear what jointly considered evidence is relied on in respect of market / functional area analysis and definition. This is particularly apparent in respect of the approach taken to employment growth, the level of housing development and Green Belt constraints.*
- It is not clear what jointly considered evidence is relied on in respect of development needs assessment. It would appear that the evidence is prepared by WHBC alone.*
- WHBC’s representations on SADC’s Strategic Local Plan (SLP) refer to, and rely heavily on, emerging joint studies in 2016 by the South West Herts group of LPAs (SWHG). However they draw no implications for their own DtC position and Plan process. This does not sit well with the technical analysis of market / functional areas advanced in the WHBC Plan (the areas overlap with the SWHG / SADC and wider). DtC soundness implications for strategic issues about development need, Plan targets, and development strategy / Green Belt policy for the WHBC*

plan as well as the SLP arise, but have not yet been considered in a DtC context.

- Examples / consequences of WHBC's inadequate approach to DtC are found in the very sudden 'jump' in housing and employment development targets now included in the Plan and the emergence of proposals for a new major development in the Green Belt at Symondshyde (see below). 'Joint policy wording' may have been developed with East Herts DC for cross boundary development proposals, but nothing similar for SADC can be claimed in respect of the Symondshyde major development. Yet it has equivalent, or greater, strategic / cross boundary local and national policy significance.*
- In particular the joint Green Belt review (2013) (JGBR) is not appropriately used in policy formulation for the Plan. Its conclusions are ignored, especially in respect of the Symondshyde proposal (see below). The justification for a change of approach has not been considered through DtC arrangements.*

Changes necessary to make the Plan sound:

Suggest Plan should not be submitted until DtC soundness points have been appropriately addressed.

Representation 2 (Objecting)

Development needs assessment (especially for housing) results in an inflated objectively assessed needs (OAN) conclusion. This is incorrectly translated directly into Plan targets that are too high.

Plan sound? No (not justified / not consistent with national policy)

Yes, wish to take part in examination hearing

References: Para Nos 2.31-2.36, 5.7 – 5.10, 10.2 / Policy Nos SP1, SP2, SP8 / Policies Map Number NA / Inset Map Name NA / Table No NA / Figure No NA / Plan SA / SEA

Supporting points:

- The dramatic shift from consultation on a Plan target for housing development of 6,800 homes (to 2029) in 2012, (a target that apparently took account of important constraints including Green Belt and was closely aligned to the joint Green Belt review – JGBR - being undertaken at that time), to a Plan target of 12,000 (to 2032) in 2015, is not clearly explained. This decision has not been subject to sufficient step by step consultation (including under DtC).*
- The basis for assessing housing development need and its relationship to the targets is poorly justified. It would appear, from Paras 5.8 – 5.9, that an underlying assumption has been made that the Plan target should be*

set at, or near to, an OAN figure. This should not be an automatic conclusion in an area of Green Belt constraint (NPPF para.14 and footnote / PPG Paragraph: 044 Reference ID: 3-044-20141006). A balancing judgement against constraints and impacts is required. From other aspects of the Plan, it is clear that setting a Plan target to meet this level of need impacts very heavily on key Green Belt purposes, and this therefore questions the rationale for the Plan target. It suggests a lower Plan target is justified (thus supporting the removal of unacceptable Green Belt changes proposed to allow development). If this reasoning is not applied, the fundamental question arises as to what purpose the Green Belt serves? It is not having any constraining effect on development and some of its specific NPPF purposes are clearly not being met. Plan targets should be based on a realistic appraisal of Green Belt constraint alongside any development needs and opportunities.

- In these circumstances, consideration of alternative development strategies through Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA) is very important to the decisions on the Plan targets. The SA does not explain the rationale for the significant environmental impacts of the changes from earlier consultation versions of the Plan. NPPF sustainable development is not demonstrated.
- The OAN figure is stated as within a range 12,616 – 13,433 dwellings (maximum of 707 dwelling per annum- dpa). It appears that this is based on market signals adjustments and local forecasts derived from optimistic employment growth scenarios with fixed commuting assumptions. Using employment derived housing growth scenarios in an area with Green Belt development constraint and a prosperous economy with complex commuting relationships to other areas and Strategic Economic Plan growth proposals for other locations needs to be justified. The Plan should address the issue of the housing / jobs and commuting balance, which can change. The OAN for housing should be judged in relation to baseline demographic projections (a lower much figure – 574 dpa). A general uplift on the baseline demographic scenario is inappropriate in an area with serious Green Belt constraints. The approach suggested is also problematic, as the baseline demographic scenario is already heavily influenced by past growth (migration led) on ‘opportunity’, previously developed land (Hatfield Airfield). It should not simply be assumed that future planning must be based on replicating an historic level of growth. To do so will create circularity of projection and target setting (PPG Paragraph: 017 Reference ID: 2a-017-20140306). This is of serious strategic / cross boundary concern as the consequent pressures from Plan targets at this level will compound pressures on Green Belt in future Plan periods. This could impinge on adjoining Districts equally constrained by Green Belt.
- NPPF / Policy SP1 ‘specific policiessuch as Green Belt, indicate that development should be restricted’ does not appear to have any impact on the content of the Plan. The level of development need assessed and then taken as a Plan target has significant environmental impacts in loss of green field land. There are unacceptable impacts on Green Belt

purposes (see below on Green Belt impact and JGBR). Green Belt does not appear to be exerting any level of restraint on potential development. 'Easy' green field development options are being provided to the detriment of urban regeneration objectives and Green Belt purposes. This is particularly the case in respect of the new village at Symondshyde (see separate representations).

- New employment land is being allocated despite forecasts and market assessments that show limited demand. Already committed and planned major new greenfield / Green Belt land allocations in the sub – region provide more than adequately for local economic development and inward investment (as intended in the LEP SEP, which is a crucial part of the agreed basis for DtC strategic planning – the SEP does not appear to envisage major employment growth through land allocations in the WHBC area). Property market evidence suggests that currently there is very limited need or demand for new employment land and premises; other than for land hungry, large scale, warehousing, or for small business units (which usually need to be provided through market intervention). There are no 'exceptional circumstances' for Green Belt release for employment use. Para 10.2 of the Plan says 'there are significantly more jobs than workers in the Borough'. Theoretically this should create scope for encouragement of conversion of employment land to residential and a move towards a closer jobs / worker 'balance'. Taking that approach could free some urban land for conversion to residential and reduce pressure on the Green Belt.*

Changes necessary to make the Plan sound:

- 1. The Plan housing target should be reconsidered. SADC suggest it should be set at no more than 10,906 (574 dwellings pa) – a demographic scenario based target. It could well be that a much lower figure is justified. This change would allow for removal of the most seriously offending Green Belt changes / development proposals.*
- 2. WHBC should further consider if it can remove the Plan employment land provision target (allowing all employment land provision that is not required for strategic reasons or necessitates Green Belt boundary change to be dispensed with). It could then transfer all the employment land 'saving' into housing land provision, (through a reduction and / or redistribution of housing development proposals, including to both protected employment areas and the currently proposed employment land allocations).*
- 3. Align OAN assessment, Plan target setting, Green Belt 'exceptional circumstances' judgements and the SA / SEA assessment on the points above, with the aim of better achieving NPPF sustainable development (SD) and reducing significant environmental impacts.*

Representation 3 (Objecting)

Development capacity within the existing urban areas appears to be underestimated in respect of the potential to intensify urban development and re-use employment land

Plan sound? No (not justified / not consistent with national policy)

Yes, wish to take part in examination hearing

References: Para No 5.7 / Policy No Whole Plan / Policies Map Number All / Inset Map name All / Table No NA / Figure No NA)

Supporting points:

- No consideration appears to be given to policy encouragement of conversion of employment to residential.*
- No consideration appears to be given to policy encouragement of residential intensification in suburban parts of the District, introduction of taller residential buildings or encouragement of residential development / redevelopment in retail and service areas.*
- These are matters that have been considered as key strands of strategy in past DtC work in Hertfordshire and are aspects of development strategy that are currently being actively demonstrated in other Districts and in other draft Local Plans.*

Changes necessary to make the Plan sound:

- 1. Re-assess urban capacity on the basis of a deliberate regeneration strategy and giving high priority to the NPPF Green Belt purpose 'to assist in urban regeneration'.*
- 2. Incorporate realistic findings into Plan policy and make corresponding reductions in green field and Green Belt land take in the current draft Plan.*

Representation 4 (Objecting)

Development impacts on NPPF Green Belt purposes are generally too great and the NPPF requirement for 'exceptional circumstances' to be demonstrated for Green Belt release are not clearly met

Plan sound? No (not justified / not consistent with national policy)

Yes, wish to take part in examination hearing

References: Para Nos 5.7, 6.1-3 / Policy No SP9 / Policies Map Number All / Inset Map Name All / Table No NA / Figure No NA

Supporting points:

- *The joint Green Belt Review (JGBR) is not appropriately referenced in the Plan. It's expected central role in defining the Plan development strategy is not apparent. This is despite the Evidence Base explanation: 'The Strategic Green Belt Review was jointly commissioned by Welwyn Hatfield Borough Council, St Albans District Council and Dacorum Borough Council. It provides a robust assessment of how land in the Green Belt contributes to the national and local purposes of the Green Belt. It also makes a high level assessment of how Green Belt land contributes to retaining openness and the character of the countryside'.*
- *Generally the Plan documents make it difficult to identify the scale and location of Green Belt loss and the assumptions used to estimate dwelling and floor space capacity.*
- *SP 9 density requirements are too loose and low. 30 dwellings per hectare dwellings per hectare (dph) is potentially wasteful in a Green Belt context.*
- *Para 5.7 states 'Green Belt boundaries have been amended where exceptional circumstances existed in order to achieve sustainable development in the Borough'. That may be a reasonable judgement in general terms, but SADC would expect such a judgment to be linked to site specific analysis through the JGBR. Development need can be an NPPF 'exceptional circumstances, but it needs to be backed by area / site specific assessments and judgements on relative Green Belt impacts. The relationship between these matters is not explained.*
- *The implicit NPPF 'exceptional circumstances' judgement made on the need for new employment land that impacts on Green Belt loss is presented unclearly and does not seem to be justified.*
- *Para 6.1 supports the GBR local purpose 'maintain the settlement pattern', yet this is not carried through in terms of the Plan proposals, as there are significant proposed changes in the settlement pattern.*
- *Policies complementary to the NPPF Green Belt purpose 'to assist in urban regeneration by encouraging the recycling of derelict and other urban land' are absent (see representation 3 for policy options). It is not clear if the Plan contributes to this purpose or not? If it does not, then why? This issue does not seem to be properly explored in the SA / SEA.*

Changes necessary to make the Plan sound:

1. *Clearly reference the JGBR and explain how it has influenced the Plan development strategy*

2. *Include a section summarising the overall level and location of Green Belt loss – Ha with dwelling capacity assumptions and estimates / employment floorspace assumptions and estimates.*
3. *WHBC should further consider if it can include specific housing site capacity and development density targets of at least 40dph, so that new green field Green Belt housing land allocations are not effectively underused or wasted.*
4. *WHBC should further consider if it can include a specific urban regeneration policy encouraging employment land conversion to housing, taller buildings and residential area intensification. Reconsider the scope this gives to reduce green field Green Belt land take and make appropriate higher housing land windfall assumptions.*

Representation 5 (Objecting)

The new village and gypsy and traveller site proposal for Symondshyde has an unacceptable impact on NPPF Green Belt purposes and does not meet the requirement for NPPF Sustainable Development (SD)

Plan legally compliant? - No

Because - not compliant with DtC

Plan sound? No (not justified / not consistent with national policy)

Yes, wish to take part in examination hearing

References: Para Nos all references to Symondshyde new village throughout Plan / Policy Nos SP3, 7, SDS6, HS34, GTLAA09, SP9, SD13, SP24 / Policies Map Number 2 / Inset Map Name NA / Table No 6 – Gypsy and Traveller site ‘off site contribution for Symondshyde – SDS6 (HAT), Table 19 / Figure No 16

Supporting points:

- *The choice of this location for a Green Belt boundary change to accommodate major development is not well justified and is directly contrary to the findings of the joint Green Belt review (JGBR). The JGBR identifies the affected area of Green Belt (Parcel 43a) as making a ‘Significant contribution towards safeguarding the countryside and maintaining the existing settlement pattern (providing the gap between St Albans and Wheathampstead) ... (and)a partial contribution towards preventing merging of Welwyn Garden City and Hatfield with Harpenden’. The GBR also says that the area is ‘part of the strategic gap between Welwyn Garden City / Hatfield and Harpenden’. It adds the following analysis: (the parcel) ‘displays typical rural and countryside characteristics in large arable fields bounded by hedgerows and trees. There is a high percentage of woodland with a large area of ancient woodland... there is limited evidence of built development and no significant encroachment....Levels of visual openness are very high in general, mainly due to the absence of built development.....’.*

- *Creation of a new village in this location will damage the Green Belt by urbanising countryside (directly contrary to the NPPF Green Belt purpose 'to assist in safeguarding countryside from encroachment'). In such circumstances development need as a general NPPF 'exceptional circumstance' cannot overcome the specific area / site damage caused by the development. The general environmental, ecological / habitat network, character and landscape impacts of development in this location are likely to be significant and adverse.*
- *The new village will impinge on an area of Green Belt where separation between settlements is already limited and very fragile. The site is close to the JGBR 'Strategic Gap' between St Albans and Hatfield which is already significantly eroded by other recent development. The distance between Hatfield and Wheathampstead is only 4 km. In the JGBR this countryside is identified as a 'Primary Local Gap' and is thus recognised as of considerable importance. The intrusion of a new village approximately equidistant between these settlements will reduce separation dramatically (directly contrary to the NPPF Green Belt purposes; 'to check the unrestricted sprawl of large built up areas' / 'prevent neighbouring towns merging into one another').*
- *In the JGBR the NPPF Green Belt purposes were considered in the context of a local application / aim in the joint GBR – 'maintaining the existing settlement pattern'. For the reasons set out above, Green Belt is clearly compromised in this respect. The Green Belt gap that would remain between Hatfield and the new village is narrow (approx. 1 km) and is compromised by the proposed lengthy new access road and gypsy and traveller site. This Green Belt will be vulnerable to future development pressure for infill and merger with Hatfield.*
- *The new village proposal does not meet NPPF SD (economic, social and environmental) objectives. It will be too small to justify provision of significant infrastructure, particularly road access improvements and secondary schooling. It will effectively become an inaccessible satellite suburb of Hatfield and Welwyn Garden City, within WHBC's area; and secondarily St Albans, Wheathampstead and Harpenden within SADC's area. There will be poor access to local jobs. Locating residential development away from the main urban areas and their services and facilities will encourage additional and longer car journeys (and make sustainable transport options less attractive). This will not assist in mitigation of current pressures on the A1M (a Strategic Economic Plan/ DtC issue). The location is currently served only by unclassified roads (country lanes). This will result in serious traffic volume and environmental character pressures on unsuitable rural roads. Any attempt to improve the affected roads will further urbanise and damage the countryside environment. This is particularly the case in respect of the proposed new main vehicular access point which cuts directly through the remaining Green Belt gap to Hatfield. The Symondshyde site is distant from railway stations (approx. 4 km to Welwyn Garden City station) and major roads (2 km to the A1M). SP3 states 'the primary focus for new development will*

be in and around the two towns of Welwyn Garden City and Hatfield where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities and to create neighbourhoods with supporting infrastructure'. It is not apparent as to how the policy on accessibility and infrastructure matches the proposal.

- In view of the SD impacts noted above infrastructure proposals for the new village are insufficient and poorly detailed. As a result they do not provide evidence of possible benefits of such a non-policy compliant development.*
- The Symondshyde new village proposal conflicts with the Plan settlement strategy in Policy SP3 and its underlying local Green Belt purpose to 'maintain the settlement pattern' (JGBR). The new village sits at odds with that Policy.*
- The likely form of development in this location (village – garden village - character / low density) will mean that, relative to the scale and impact of Green Belt loss, the dwelling yield will be low (as opposed to the potential for higher residential density on urban and urban extension sites). The specific site size and density assumptions made are not clear. The overall site area is 63Ha. Assuming 60% is available for housing gives a net development area of 38 ha. The yield of 1,130 dwellings on this area gives a net residential density of only 30 dwellings per hectare (dph). On a site of this kind the strategic open space requirement is low, so most of the site would be developed for housing (Figure 16). On that basis the net density could be as low as 18dph. Thus, the low end, general, density requirement at SP9 appears to be applied to the new village. Using land at 30 dph in a Green Belt context is wasteful.*
- The associated gypsy and traveller site proposal on the Coopers Green Lane frontage extends the countryside and landscape impact of the new village and the adjoining major housing proposal SDS5 / HAT 1. The site will further damage the Green Belt by impinging on the remaining narrow gap between the new Village and NW Hatfield. The site is isolated from all services and facilities on the wrong side of a busy road, but will have a prominent Green Belt and landscape impact. If such a proposal is required with the new village, it should either be located within the new village and accessible to any new facilities offered (e.g. primary school). Otherwise it should be located as part of the proposed urban extension SD5 / HAT1 (which already includes a more accessible gypsy and traveller site).*

Changes necessary to make the Plan sound:

- 1. Remove Symondshyde – new village and gypsy and Traveller site (SDS6 / Hat 15 and HS 34) from the Plan.*

Representation 6 (Supporting – but with related objection on clarification required)

Proposals for the Green Belt 'Strategic Gap' between St Albans and Hatfield are generally appropriate and can underpin the essential, but long delayed, implementation of the Ellenbrook Country Park (ECP) planning agreement. Issues and Plan proposals for ECP should be clarified in the Plan.

Plan sound? Yes (subject to points below on Plan changes)

Yes, wish to take part in examination hearing

References: Para No 12.25 / Policy No SP12 / Policies Map No 2 / Inset Map Name NA / Table No NA / Figure Nos 6, 8

Supporting points:

- The Plan policies for Green Belt, which maintain the strategic gap (Joint Green Belt Review – JGBR) directly between St Albans and Hatfield are welcome i.e. withdrawal of major housing development proposals included in the Regulation 18 consultation, necessary to respond to the vulnerability of this narrow strategic Gap and to ensure the Plan accords with the JGBR.*
- The ECP proposal is a long standing, committed, green infrastructure scheme, subject to an extant planning agreement. However the CP is not currently fully secured / implemented. Positive general comments in Policy SP12 are welcome, but are too vague.*
- Proposals for, and the extent of ,the Ellenbrook Country Park proposal are not clearly stated in SP12 / Figure 8 and indicated on the Key Diagram / Policies Map. The general green infrastructure notation on the Key Diagram is not clear enough to provide certainty about the future of this area.*

Changes necessary to make the Plan sound:

- 1. The ECP should be listed as a proposal and clearly shown on the Key Diagram and Policies Map.*