

Standing up for Hertfordshire's countryside

Planning Policy Department
Welwyn Hatfield Borough Council
Council Offices
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

Our Ref:

Your Ref:

30th January 2013

Dear Sirs,

Consultations on : 'EMERGING CORE STRATEGY' and 'LAND FOR HOUSING OUTSIDE URBAN AREAS'.

The following is the response of CPRE Hertfordshire to the Council's current consultation documents on Emerging Core Strategy and Land For Housing Outside Urban Areas. We have chosen to respond to both in this letter, rather than through the Council's on-line facility as both consultations are inextricably linked and none of the questions on the on-line Response Forms allow us to cover the concerns which the documents raise.

The 'Emerging Core Strategy' document is the Council's proposed overall strategy for the development of Welwyn Hatfield until 2029 and 'Land For Housing Outside The Urban Areas' sets out potential development sites in the Green Belt. Taken together, we consider the consultation to be flawed and, if based on this, the resulting Core Strategy may be unsound.

(1) Our first area of concern regarding this consultation is that the two documents have to be read together in order to fully understand the Council's intentions. The main reason why they need to be read together is because the 'Emerging Core Strategy' contains information which amplifies the significance of the potential development sites that are in the 'Land For Housing Outside The Urban Areas' document, which in turn raises questions about the proposed Emerging Core Strategy.

Specifically: Paragraph 1.26 of 'Land For Housing Outside The Urban Areas' states that the 'Emerging Core Strategy' proposes the setting of a requirement for 7,200 new houses up to 2029, 6,800 of which would be provided in Welwyn Hatfield, with the balance being built on adjoining land in St. Albans and East Herts Districts. To meet this target, some of the 6,800 houses would have to be built in the Green Belt. In order to ensure that Green Belt boundaries will not need to be moved again after 2029, the document states that even more Green Belt land will have to be set aside for development, but this is not quantified.

It is only by going to the 'Emerging Core Strategy' do you find out in paragraph 5.13 that the actual target is for 9,200 new houses, most of which would have to be built in the Green Belt. Even in the Emerging Core Strategy this very important point is not made clear.

Paragraph 6.24 merely states that around 45% of all new housing would take place on previously-developed land. That means that 55% of the total housing provision in the Strategy would have to be built on Green Belt land. Regrettably neither document makes this clear.

While we appreciate the aspiration of the council to pre-empt the need for a further Green Belt boundary review immediately following the plan period, we are concerned that the average member of the public could be easily misled about the full implications of the Council's proposals. Nor is it clear that the process which the Council has adopted represents either a formal review of the Green Belt boundaries or their intended permanence, as required by paragraph 83 of the National Planning Policy Framework.

(2) Of greater concern is the confusion in the documents about the status of the sites on which consultation is being carried out.

'Land For Housing Outside The Urban Areas' sets out nine sites which, in total, could accommodate 6,480 houses in the Green Belt. (This rises to 6,940 if the potential areas in St. Albans and East Herts are also included). However the Council declares that five of those sites are "not suitable to take forward". If that is so, why is the Council including them in the consultation if it has already discounted them? The Planning Inspectorate guidance notes on Unsound Core Strategies clearly states that 'if options are limited there is no point in trying to artificially create options.'

We note from a comment made by the Council to Jack FM on 16 January 2013 that "The reason for including areas of land that have not been considered suitable to take forward is to show what alternatives have been considered around the two towns." Again that is not made clear in the documents, which are consequently misleading.

Similarly Policy CS4 in the 'Emerging Core Strategy' identifies 'Broad Areas of Growth' to the north-east of Welwyn Garden City at Panshanger Airfield (WGC 4) and between Hatfield Garden Village and Stanborough (HAT 1), which implies that the Council has a preference for these sites, whatever the outcome of the consultation.

This in effect leaves only two sites, West of Ellenbrook (HAT 3) and South of Welwyn Garden City (WGC1), on which genuine consultation appears to be taking place. HAT 3 requires expansion into St Albans District.

(3) There is no indication in either document that appropriate cross boundary dependencies with St Albans or East Herts have been discussed and agreed. In fact the response from East Herts Council included in the consultation comments on the Welwyn Hatfield Council website is negative. Consequently proposed extensions beyond the council boundary are speculative, premature and, once again, misleading.

(4) The quantum of housing is also confusing. The total amount of housing in the Green Belt proposed in the 'Emerging Core Strategy' is 5,960 units. Even if all of the Council's favoured

sites are taken together they would only contribute a total of 3,015 houses in the Welwyn Hatfield Green Belt. (3,535 if the proposed expansions into St Albans and East Herts are included). There is no indication of where the shortfall is to be found. If the Council's intention is for this shortfall to be taken up by either through further Green Belt boundary review, use of sites currently considered to be unsuitable, or additional expansion into East Herts then that should be made explicit in order that the public can form a view.

(5) Confusion also arises in the Emerging Core Strategy with conflict between Para 6.10 which says : "The following option was considered to be a reasonable alternative" i.e. growth focused on Welwyn Garden City and Hatfield together with limited growth around the borough's large excluded villages, but the following para. 6.11 says: "This option was rejected, as it would result in more Green Belt land being released for housing than the proposed option, increasing the amount of urban sprawl and impact on the landscape than is necessary" Either it is or it is not a reasonable alternative. It is difficult to see how limited growth around the large excluded villages would result in more Green Belt land being released or an increase of urban sprawl, unless there was an overall increase in the number of houses being built in the Green Belt. Logically growth around the villages should lead to a reduction in growth around the major towns. We note from the SHLAA that there is potential for over 450 units in Brookmans Park, Cuffley and Welham Green, but there is no clear explanation as to why those have been excluded from this exercise.

The current wording makes it impossible to determine the Council's position or make a reasoned response to it.

(6) Policy CS4 is equally ambiguous. It includes the comment that "Safeguarded land will only be released for development following a review of the Core Strategy and when the council's monitoring indicates that insufficient land exists from within the borough's defined urban areas to meet longer term housing requirements beyond the plan period, and green infrastructure has been established to provide a permanent separation between Hatfield and the village of Smallford." However there is currently permanent separation between Hatfield and Smallford. Green Infrastructure does not require to be established, it already exists, with a clearly defined Green Belt boundary. What is actually proposed in 'Land For Housing Outside The Urban Areas' is to breach that boundary and destroy the current green infrastructure. Consequently one consultation document is in contradiction with the policies in the other.

(7) The initial findings of the 2011 Census, whilst indicating that the population of the Borough continues to increase, was actually 3,900 less than the mid-year 2010 population estimate of 114,400. This calls into question the population projections on which the housing requirement has been based and it may be prudent of the Council to review housing need in the light of the Census data.

(8) Finally we are not convinced that all avenues and options to deliver residential accommodation have been explored by the Council. To cite just two examples: At its Planning Control Committee on 3 January 2013, the Council granted approval to the

University of Hertfordshire for a substantial number of student residences. Those figures have not been included in the calculation of residential requirement in the Core Strategy. Given that a high proportion of houses in Hatfield and other parts of the Borough are in student occupation, a more rigorous approach to the provision of student residences could free those houses for general occupation. Similarly a more flexible approach to the designation of employment areas in order to implement the Government's intention to allow change of use of redundant office space to residential without planning permission could result in a significant contribution towards the housing requirement in the Borough.

For all of the above reasons we consider that the current consultation is flawed. As things stand we consider that the current lack of clarity makes the soundness of the strategy questionable and could lead to an unsound Core Strategy. We call on the Council to review its documents and re-consult.

Yours faithfully,



Steve Baker
Planning Manager