

# WHBC Local Plan Consultation Document January 2015

## **Points for consideration when responding to the consultation:**

The points below are set out to assist Panshanger residents and anyone wanting to retain Panshanger aerodrome in responding to the consultation. It may seem daunting and time consuming to add your comments online, however we will shortly offer a short guide about how to navigate the website. If you are struggling feel free to contact us by email at: [panshangerpeople@gmail.com](mailto:panshangerpeople@gmail.com) . There is also an FAQ page on the consultation website which may help you:

<http://consult.welhat.gov.uk/common/help.jsp?tagNames=PFlivedocument>

If you want to make a written submission you can fill out a form from the council here:

<http://consult.welhat.gov.uk/file/3287683>

You can email them about the consultation at: [localplan@welhat.gov.uk](mailto:localplan@welhat.gov.uk)

Or call them on: 01707 357532

You can write to them at:

Planning Policy, Welwyn Hatfield Borough Council, Council Offices, The Campus, Welwyn Garden City, AL8 6AE. You can request printed copies of the consultation response form above, to give to those not able to access the online form the opportunity to be involved.

Each section in the consultation has a reference number to make it easier for residents to find the parts that may be of concern to them. We offer some suggestion below on the Local Plan Document, as well as the other two documents now being put out to consultation.

These are only for guidance and you may wish to make other points of your own.

The main Local Plan document is the primary focus, but it is still important to comment on the other two other documents as they comprise the evidence the council has used to promote Panshanger as a Broad Location for Growth. We have some concerns about parts of the evidence and feel that people might also want to raise points about it. We also offer guidance on these from a Panshanger perspective.

It's very important that as many people as possible make their voice heard on this. Essentially the plan for Panshanger has not changed since the last consultation, despite hundreds, if not thousands, of objections from residents and aviators. It seems that we were asked for our views but were then ignored.

This is a new consultation so even if you responded to the last one in 2012 you will still need to add your comments again. The last consultation is still online and you should be able to search for your previous comments, many of them will probably still apply. You can follow this link and search for yourself by Surname (You may need to log in to do this):

[http://consult.welhat.gov.uk/common/search/advanced\\_search.jsp?initial=A&eventId=17414&page=0&sortMode=response\\_date&lookingFor=consultees&tab=list](http://consult.welhat.gov.uk/common/search/advanced_search.jsp?initial=A&eventId=17414&page=0&sortMode=response_date&lookingFor=consultees&tab=list)

(Remember you can use cut and paste to retrieve your previous comments for editing)

### **Local Plan document guidance points: top ten in no particular order:**

#### **1) Previous responses and participation.**

Section 1.4 quote: This document has been prepared following a review and update of our evidence, consideration of the responses to the Emerging Core Strategy and regard to national policy and best practice guidance. The changes to the strategy and the proposals for development have been subject to sustainability appraisal

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=3277374](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=3277374)

Comment:

How have the responses to the 2012 consultation been considered in relation to Panshanger, WGC4? The proposals in this updated plan are almost exactly the same as proposed in the Emerging Core Strategy in 2012. Hundreds of residents and aviators responded with many objections to the plan for Panshanger but these have apparently been ignored and have not changed the council's approach at all. Resident's views may have been acknowledged through the consultation but nothing has changed. The Localism Act 2011 and the National Planning Policy Framework set out the requirement for public participation. That doesn't just mean asking for feedback but actually designing your local plan around that feedback, to reflect what residents actually want. Section 155 of the NPPF states:

"A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."

There is no collective vision for Panshanger in this plan, certainly not one that takes into account the very many comments and objections made by residents during the last consultation. No priorities have been agreed with the community, no attempt to agree them has been made as there have been no public debates or focus groups during the formation of this plan. Attempts to designate the area as an Asset of Community Value were rejected on very spurious grounds and the council has never made any serious attempt to promote a neighbourhood plan in Panshanger.

There is also a point to be made about a wide section of the community being engaged. Consultation responses are encouraged via a website portal. This presents a barrier to participation for sections of the community, who have no access to the internet. The council have not written to Panshanger residents explaining how to send written responses for those that have no access to online options. They have not sent a single letter about the consultation to residents, preferring only to run a vague advert in their own quarterly magazine, which makes no reference to Panshanger or housing numbers. Posters which are similarly vague about the areas in question have been produced but not

very widely circulated as far as is known. The level of public awareness of the consultation currently appears low, as last time.

## **2) Dispersal across the borough**

Section 4.1 quote: “Taking into account views received following consultation on the Emerging Core Strategy, the results of the Sustainability Appraisal of different distribution options carried out in 2012, the evidence on the scale of the need for housing, the location of suitable opportunities for development around the borough and the benefits that can flow from limited development in helping to sustain community facilities and services; the council now proposes a more proportionate and more dispersed pattern of growth to meet the housing needs of the borough.”

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221813#section-1421325221813](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221813#section-1421325221813)

### Comment:

The 2012 Emerging Core Strategy was widely criticised for promoting a housing distribution that was unbalanced and disproportionate. The planning professionals suggested several options as to how best spread development across the borough and recommended an option to the cabinet that included some development around the major villages in the borough. The cabinet however decided that it would be ‘perverse’ to adopt this approach, (to use their own word) and over-turned the planner’s recommendation meaning that in the 2012 consultation only large developments bolted on to the side of Hatfield and Panshanger in WGC were promoted.

Now, two years on, the same thing has happened again, resulting in a lack of proportionate distribution, and not what the planning professionals recommended to the cabinet. This time, all sites have been categorised by the planners using ‘less favourable, finely balanced, more favourable’ categories (a non-NPPF methodology). The Panshanger site was classified as finely balanced. However, in December 2014 the housing panel (led by councillors for Brookmans Park and Northaw and Cuffley) decided that only more favourable sites would be the focus of this consultation, and that they would have Panshanger reclassified to more favourable status, meaning it would again be the focus of the consultation. These more favourable sites are almost exclusively centred around Welwyn Garden City and Hatfield – see table 1 for this distribution

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221813#section-1421325221813](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221813#section-1421325221813)

The meeting where the change of classification for Panshanger was imposed is available online <https://www.youtube.com/watch?v=lgsaFa4x7qo> (around 1hr into the meeting) and the reaction of the audience to the cabinet meeting <https://www.youtube.com/watch?v=ElkRrB37cag> shows the level of public dissatisfaction at this last minute councillor imposed plan that over-rides the officer’s classification. These councillors are not planning experts and have not judged all the other site classifications in this document. The councillors who instigated this change do not represent Panshanger but do represent other areas which are fighting large housing numbers in their area.

Although the council will argue that the other sites are available to comment on in the appendix, this does not give the same weight to those sites as the more favourable sites in the main document. Had they not included the other sites at all, the plan would have certainly been thrown out by the planning inspector. By not allowing more growth in the villages, they are effectively removing the opportunity to reinvigorate them by offering more employment, facilities and a more divergent housing stock. They are also removing some of the most sustainable sites near railway stations from the Local Plan.

Making Panshanger more favourable may also make it harder for the council to deny any developer led planning application made outside of the local plan

It is hoped the independent planning inspector gives full weight to the magnitude of what has happened regarding the site allocations when he comes to judge this plan as sound or unsound. It is certainly not the case that this plan represents the view of most Panshanger residents. Previous petitions submitted to the council prove that point.

### 3) Unsustainable location

Policy CS3 states: *"The primary focus for new development being 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 new neighbourhoods with supporting infrastructure"*

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221813](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221813)

and 9.2 states: *"It is a legal requirement of the planning system that Local Plans should seek to deliver sustainable development and this is reinforced in government policy. Therefore in deciding which sites should come forward for development the council has to ensure that the principles of sustainable development have informed the assessment of sites both on an individual and cumulative basis"*

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221819#section-1421325221819](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221819#section-1421325221819)

#### Comment

Panshanger is not a sustainable location; accessibility to strategic transport networks and public transport and job opportunities shops services and other facilities are not good. The Local facilities in Panshanger at Moors Walk are already overstretched and no new community facilities are proposed in WGC4. No new shops (apart from a small convenience shop), Community halls or sporting facilities will be provided, meaning that the existing facilities in Panshanger will be at breaking point. Existing residents will have their current quality of life negatively impacted.

The distance from the eastern point of the development to Moors Walk would be 1.5 Km a much bigger distance than the 720m used by the council to judge if a site is sustainable. Distances to the town Centre and the train station are over 3Km and the nearest employment area is 2Km from the

mid-point of the development. No employment sites are envisaged for the area meaning more car journeys.

These distances show that the site is not a sustainable location, inevitably leading to more car journeys, CO2 emissions and congestion, because even if there is an extended bus service it will be slow getting to the town centre and probably infrequent. Currently the circular bus service to the town centre (206) only runs three days a week and the last bus is at 3:05pm. It doesn't run at all at weekends.

It would be around 45mins walk into the town for those that are able to walk that far and have time to do so. Apart from the A414 there appears to be no strategic access to transport networks from this site. Meanwhile there are several other sites that are far closer to the rail network have been classified as less favourable. It is a fact that a very significant number of borough residents rail commute daily into London for employment, this dimension does not seem to have been taken into account at all. Rail transport is sustainable, but private car use to drive into the town centre and parking near the station would be unsustainable. Other sites offer far better rail transport links but this is not promoted in this plan.

There is no plan to create employment on the Panshanger site, meaning people living there would have to travel elsewhere for employment. As outlined above this is problematic, this plan does not maximise accessibility to job opportunities by any measure. The provision of infrastructure seems to be a gaping hole in the local plan, as outlined in the council's own document on the subject. There are no assurances that the supporting infrastructure would ever materialise for this site. It's worth noting that no new local infrastructure was put in place following the last major extension to Panshanger in the 1980's. The current retail infrastructure would buckle if it had to serve thousands of new residents, parking at Moors Walk and Morrisons is already at capacity for much of the week. This plan would have a serious negative impact on the lives of those already living in Panshanger dependent on local services.

The government planning inspector who reported on the current local plan in his 2004 report, specifically commented that he did not think that the Panshanger site was sustainable and thought that the safeguarded (ASR) status was not appropriate. However, he did not change the status because it was too awkward a process.

#### **4) Habitat and Environment**

Section 9.5 states:

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221819#section-1421325221819](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221819#section-1421325221819)

Comment:

The site proposed for Panshanger (WGC4) has a high environmental value but WHBC have chosen not to recognise it. The site is an area of unimproved grassland which is rare habitat in this part of the country. Volunteers from the British Trust for ornithology have erected owl boxes and carried out bird ringing on the area in recent years. Local residents use the Hilly Fields Meadow every day and ground nesting birds such as Skylarks regularly nest there in season. The Homes & Communities agency own the Hilly Fields part of the site but it has never been commercially cultivated. This plan proposes to concrete over a much valued local amenity choosing not to recognise its ecological value. This point was also raised in the last consultation responses but no work has since been undertaken to assess the environmental value of WGC4 despite the many objections raised to this

loss. Natural England have recommended that environmental surveys are carried out before sites are selected.

A December 2014 House of Commons report into the operation of the NPPF states the following:

*“The NPPF provisions on the natural environment have an important role to play in ensuring sustainable development is delivered. Local authorities are missing an opportunity if they do not set out a clear vision for the biodiversity of their area.*

*Moreover, if they do not set out clear policies in respect of the environmental aspects of sustainable development, it may be harder to resist the economic aspects taking a more dominant role. We strongly encourage all local authorities to make the natural environment an important theme in their local plans. To do so, smaller authorities may need to tap into ecological skills available elsewhere, be it in other local authorities or the Planning Advisory Service.”*

Comments are made throughout the document about protecting the community facilities and services and preserving the historic environment and setting as well as a “vision” for Welwyn Garden City. On all these counts, development at Panshanger would not be protecting community facilities, its biodiversity or historical environment. The Landscape sensitivity report also contains errors relating to the habitat, meaning that the landscape is more sensitive to change than they estimate.

## **5) Numbers of homes**

Section 3.2

Web link:

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221810#section-1421325221810](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221810#section-1421325221810)

Section 3.2 Reads: *“The target can be lower than the assessed need in circumstances where the adverse impacts of doing so would **significantly** and **demonstrably** outweigh the benefits when assessed against the policies in the framework or the framework indicates that development should be restricted. If a local planning authority proposes a lower target it should seek the agreement of a neighbouring authority that they will meet that unmet need.”*

Comment:

The current housing proposal if taking into account only the most favourable locations falls well short of the objectively assessed housing need of 12,500. This means that when more housing numbers are required to fill the requirement, or more favourable sites or parts of sites are proven to be undeliverable, sites from the other categories will have to be added. These sites will not have been adequately consulted on as they have been side-lined into an appendix, making an expensive farce of this whole consultation exercise. No doubt the council hope they can allocate fewer homes in the borough than the recommended number, but doing so by effectively manipulating the consultation and not declaring this openly is not a fair or sensible way of doing it. In the same way that Panshanger was put in the most favourable class by the cabinet, the same could have been done for the hundreds/thousands of potential home sites which have been promoted to the council by developers around the larger villages.

The adverse impacts of building 700+ homes in Panshanger, that will be several kilometres from the town centre and train station, the loss of habitat and wildlife, the loss of local amenity land, and the huge impact on already strained infrastructure demonstrably outweighs the benefits of what is proposed for Panshanger. Why is this not properly evaluated and recognised?

## 6) Loss of an Airports and Air Transport facility

**10.21 states** “This gave rise to a number of objections about the loss of the aerodrome from local residents, aviation groups and Sport England, the national sporting body. Sport England view WGC4 as a strategically important site for aviation; that is of at least regional importance to air sports.”.. “In addition there will be a requirement to explore the feasibility of moving the runway to the north to allow for the provision of housing and the retention of the runway.”

### Comments

The council have paid no heed to the fact that they are removing a sporting facility which is of regional importance, without proposing how it could be replaced.

This is contrary to the following NPPF guidelines which state that planning authorities:

*“consider the role of small airports and airfields in serving business, recreational and emergency needs”*

and *“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.”*

In paragraph 28 on page 9 The NPPF states that *planning policies should support economic growth and the expansion of all types of businesses and “should promote the retention and development of local services, community facilities and sports venues”,*

The NPPF on Page 18 paragraph 74 states:

*Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- *An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss*

Also two of the NPPF sustainability aims are:

**An economic role** – *contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure*

**An environmental role** – *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

The council have not applied any of these guidelines by designating the WGC4 site. They originally labelled the site as finely balanced as some acknowledgement of this omission, but by placing it in

the more favourable category, they have effectively ignored all the information provided to them by the GAAC, LAA and in independent reports submitted by Panshanger People.

Their only concession is their statement that the feasibility of re-aligning the runway and fitting it onto the site with some housing should be explored with the owner. This should be a requirement, not a half-hearted request and should exclude enough land to make provision for adequate hangers and buildings to make a viable business or there would be still be loss of facilities. This statement is meaningless if they have no concrete proposal to back it up and has no place in the consultation. It is merely a diversion to make us think they are serious about meeting their obligation to comply with the NPPF guidelines listed above.

The loss of the airfield also precludes the potential for a vibrant business on the site which could provide: leisure, training, educational links with the University of Hertfordshire, engineering apprenticeships, a visitor attraction, flexible transport options and somewhere which actually makes Welwyn Garden City a more interesting place to live. An estimated 43 jobs were lost when operations ceased on Panshanger, but the potential loss from what could be a bigger business is much more.

Losing the airfield diminishes the national network of small airfields which is needed to keep the General Aviation business sector alive. Without a network of airfields, this sector will be reduced and gradually die. In response to this, a requirement to consult the DGLC before planning to build on or obstruct an airfield is likely to be proposed by the government in the near future and the council would be in breach of this if they allocate the site for development.

#### **7) Sewerage and Water Run off**

**This issue is covered more in the Draft Infrastructure delivery and Sustainability reports but is relevant to the site selection of WGC4**

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221820#section-1421325221820](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221820#section-1421325221820)

#### **Comment:**

Sewers from this area drain into the Rye Meads sewerage facility in the Lea Valley as do homes in Harlow District, Broxbourne Borough, Epping Forest District, Uttlesford District, East Herts District, Stevenage Borough and North Herts District. All of these areas are going to be building new developments in the next 20 years, so there will inevitably be under-provision of sewerage facilities at Rye Meads. New facilities would require at least 5yrs work and are next to a sensitive wildlife centre. Given the numbers of local Boroughs that will rely on Rye Meads for new developments and the difficulties of coordinating scheduling of these, sewerage facilities for new development in WGC4 may be difficult to achieve. Development in the southern parts of the borough, which are served by different sewerage works, would not impact on this issue, so should therefore be more sustainable.

Potential flooding downstream and contamination of groundwater near the SSSI at Tewin and the Panshanger Park stretches of the sensitive chalk Mimram River have not been considered. Although SUDs (sustainable drainage) may help this, it is noted in Appendix 2 that SUDs solutions to these problems should not be relied on. The WGC4 site sitting on Chalk substrate is particularly susceptible to groundwater pollution draining into the neighbouring Mimram River valley.

House of Commons report on the NPPF (December 2014) states:

“In setting out the reasons for approving development, decision-makers should fully explain the consideration they have given to its impact on infrastructure and explain how and where they expect the infrastructure to be provided, and to what timetable.”

This does not seem to have been properly considered in the Local Plan.

## 8) Schools

**This issue is covered more in the Draft Infrastructure delivery report but is relevant to the site selection of WGC4**

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221820#section-1421325221820](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221820#section-1421325221820)

### Comment.

700 homes would require at least 1 form entry provision in both primary and secondary schools and all schools are at capacity in the Borough. The Council suggest that Springmead primary school could expand to 3FE (form entry), however the county council prefer 2FE and do not want 3FE primary schools in the County, indeed none exist as yet in the borough. Expansion at Springmead would therefore be directly contrary to county guidance. A primary school may eventually be provided in East Herts, but this would not be before 2031 (the end of the current plan period) as the land requires gravel extraction before development can commence. If Springmead could not be expanded and any possible primary school in East Herts would not be developed until after 2031 then there would be no primary school provision. In either case, Springmead would be too far from residents at the eastern end of WGC4 and a school in East Herts would be too far from residents at the western end to be within stated walking distances.

The provision of secondary schooling is even more uncertain. The option for WGC4 is assumed to be in East Herts, but as stated before, this would not be before the end of the plan period.

Welwyn Hatfield and East Herts have a duty to cooperate under the NPPF but there is little evidence or reference to any agreements, provisional or otherwise in these documents. There appears to be no joint working that outlines the what, where and when of any infrastructure delivery or cross-border housing target negotiations, as required in the NPPF legislation.

## 9) Impact of WGC4 on Panshanger Park and Green Infrastructure

**This issue is covered more in the Draft Infrastructure delivery report but is relevant to the site selection of WGC4**

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221820#section-1421325221820](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221820#section-1421325221820)

and 10.6 in the infrastructure report (Mimram valley)

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/draft\\_idp\\_jan2015?pointId=d162195e2931#section-d162195e2931](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/draft_idp_jan2015?pointId=d162195e2931#section-d162195e2931)

**Quote from 10.6 of the infrastructure report:**

“Mimram Valley Greenspace: The purpose of this project is to provide green infrastructure for landscape, habitats and people through the enhancement of the Mimram river corridor, and to link to multifunctional greenspace at Panshanger Park as part of the long term future of the site; enhance the Mimram Valley chalk river corridor, making greater space for water and improving landscape character and biodiversity through active management to ease pressures; provide physical access to the water course and greenspace opportunities; encourage wetland conservation and enhance links to the wider network, connecting to the Thames Tributaries River Valleys and Corridors Project; restore the historic, biodiversity rich designed landscape of Panshanger Park post mineral extraction; and enhance settlement setting through positive site restoration.”

Building on WGC4 would spoil the views across the Mimram valley and bring development within 110m of the historic, biodiversity rich designed landscape of Panshanger Park. Far from providing “opportunities to develop strategic green infrastructure links between Welwyn Garden City and Panshanger Park” as quoted in point 10.21 of the local plan consultation document, it will potentially destroy the environment at Panshanger Park. These links do already exist in any case through Moneyhole Park and from the footpaths adjacent to the airfield that link up with the Butterfield Way from Panshanger Lane. It is hard to grasp how building a 700 home development so close to the Panshanger Park boundary constitutes a Green Infrastructure Link. What exists today is such a link and it would be degraded if the green were replaced with the hues of concrete and brick, not to mention the loss of existing wildlife habitat.

Friends of Panshanger Park are very concerned about the impact of possible development on both sides of the park, right up to the boundary as they will disturb the setting of the park and constrain the movement of any wildlife around the area. They are calling for a buffer zone of non-development of approximately 500m to be declared around the park boundaries, which would exclude a substantial part of the WGC4 site.

***Comments from the recent House of Commons assessment of the NPPF are relevant here:***

“The RSPB had conducted an analysis of a small sample of local plans and had found that overall they did “not set out coherent, strategic and spatial visions for biodiversity”.<sup>69</sup> Mr Marsh considered that number of councils were “missing that opportunity to set out a more positive vision of what they might be doing for the environment in their area”. The RSPB suggested that a lack of ecological expertise within local authorities might be part of the problem.

The NPPF provisions on the natural environment have an important role to play in ensuring sustainable development is delivered. Local authorities are missing an opportunity if they do not set out a clear vision for the biodiversity of their area. Moreover, if they do not set out clear policies in respect of the environmental aspects of sustainable development, it may be harder to resist the economic aspects taking a more dominant role. We strongly encourage all local authorities to make the natural environment an important theme in their local plans. To do so, smaller authorities may need to tap into ecological skills available elsewhere, be it in other local authorities or the Planning Advisory Service.”

Where is the clear vision for biodiversity in this plan? Where can evidence be found that the natural environment is an important theme in this proposal for Panshanger?

## **10) Traveller and Gypsy Site**

**5.7 states** "In relation to Gypsy and Traveller development, national planning policy allows for Green Belt boundaries to be altered in exceptional circumstances if the planning authority considers this is necessary to meet a specific, identified need for Gypsy and Traveller sites. However, national policy also allows for sites to be 'inset' through the plan-making process, meaning that sites can be removed from the Green Belt on an individual basis and do not, therefore, necessarily need to be contiguous with an urban boundary. If land is removed from the Green Belt, it should be specifically allocated in the development plan as a Gypsy and Traveller site only."

Web Link:

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/local\\_plan\\_consultation\\_january\\_2015?pointId=1421325221814#section-1421325221814](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/local_plan_consultation_january_2015?pointId=1421325221814#section-1421325221814)

Comment:

Whilst there is a need for Gypsy and Traveller sites in the borough, the council seem to have placed the proposed site in WGC4 actually within the housing development. This does not seem to be a desirable location for either the local or traveller communities. Since there is provision to put this site in any location in the greenbelt, why would they place it within a housing development?

It is also noticeable that there are no sites defined in the southern part of the borough (only in WGC, Hatfield and Woolmer Green). Do travellers and gypsies not want the opportunity to move around the whole of the borough? Is there evidence that they were consulted about this in the formation of this plan?

***All of the above appear to be very valid concerns as far as we are concerned; residents will likely have many more that can also be submitted to the consultation.***

## WHBC Draft Infrastructure Delivery Consultation Document January 2015

1. In items 2.2, 2.3, 2.4 and 2.5, the Council explain how they intend to use and adhere to the NPPF guidelines. However, not considering the retention or replacement of the Aerodrome at Panshanger, will lead to the loss of a strategically important regional sports and transport facility, which is directly contrary to several NPPF guidelines.

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/draft\\_idp\\_jan2015?pointId=d162195e3662#section-d162195e3662](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/draft_idp_jan2015?pointId=d162195e3662#section-d162195e3662)

In item **11.14**, they state that Sport England have notified them of this problem (as have the GAAC, LAA and Panshanger People, who commissioned report by Kember, Loudon and partners which was submitted to the council and many others) but they make no explanation of how they will address this issue.

2. In **6.22**, the Council suggest that Springmead primary school could expand to 3FE (form entry), however in 6.32 it states that the HCC prefer 2FE and do not want 3FE primary

schools in the County, indeed none exist in the borough. Expansion at Springmead would therefore be directly contrary to county guidance. Since any possible primary school in East Herts would not be delivered until after 2031, there would be no primary school provision for WGC4 if Springmead could not be expanded. In either case, Springmead would be too far from residents at the eastern end of WGC4 and a school in East Herts would be too far from residents at the western end to be within stated walking distances.

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/draft\\_idp\\_jan2015?pointId=d175879e11587#section-d175879e11587](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/draft_idp_jan2015?pointId=d175879e11587#section-d175879e11587)

3. **6.48**

Secondary school provision would not exist on the eastern side of Welwyn Garden city until after the end of plan period of 2031 as the Secondary school in East Herts would not be built before then.

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/draft\\_idp\\_jan2015?pointId=d175879e11587#section-d175879e11587](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/draft_idp_jan2015?pointId=d175879e11587#section-d175879e11587)

4. **7.45** anticipates the QEII will cope with the extra demand, but no mention is made about how or if the Lister Hospital could cope with the increased demand.

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/draft\\_idp\\_jan2015?pointId=d162195e10#section-d162195e10](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/draft_idp_jan2015?pointId=d162195e10#section-d162195e10)

5. **14.1 Key issues with infrastructure funding**

**Bullet points quoted:**

- at present the ability to secure funding for the infrastructure that has been identified in this document needs in part at least to be taken on trust. The infrastructure identified will be delivered over the best part of 20 years, and the majority of providers' forward plans are usually over the next 5 years (e.g. NHS England, water companies, Network Rail etc);
- for this reason it is important to focus as a priority on delivering infrastructure over the next 5 years, recognising that a range of different and potentially unknown factors will influence the delivery of infrastructure required in later years;
- the picture is in any event clouded because there is an ever shifting narrative about precisely what infrastructure will be provided in the future and who will deliver it;
- one of the chief sources of funding is likely to be the Community Infrastructure Levy (CIL) but that has yet to be introduced in Welwyn Hatfield and this may not happen until 2016/2017;
- restrictions in the use of s106 agreements will be brought into force in April 2015 and this will restrict their ability to fund new infrastructure - although it is probable that infrastructure required for the major extensions and some of the larger village schemes will still continue to be funded by this means;
- the prospect of funding of infrastructure by the providers themselves is likely to be extremely limited and will tend only to happen as "funding of last resort" (where there has been a failure to secure an alternative form of funding) or where the provider can recoup investment from service users (as in the case of the utility companies);
- a range of government programmes to fund new infrastructure remain available although there is a great deal of competition for access to such funds which cannot therefore be

- guaranteed, whilst the nature and quantum of funds in the future will always be a matter of some uncertainty beyond the short term;
- the extent to which infrastructure need is matched by infrastructure funding is influenced to a considerable degree by the state of the nation's finances and the government of the day's willingness to offer funding to infrastructure providers through programmes such as the Local Growth Deal and the Priority Schools Rebuilding Programme;
  - for infrastructure investment to be rolled out successfully there must be the appropriate agencies with the right levels of expertise and commitment to take responsibility for making things happen; and
  - finally, given the importance of implementation and the emergence of CIL the local authority as CIL charging authority needs to have the appropriate governance arrangements in place.

Comment:

It is clear that there are some very significant concerns about any of the infrastructure will be funded. Even if only the first five years of funding is required at the outset the mechanism of achieving that is not presented in this plan. The house of Commons report on the NPPF (December 2014) states:

**“In setting out the reasons for approving development, decision-makers should fully explain the consideration they have given to its impact on infrastructure and explain how and where they expect the infrastructure to be provided, and to what timetable.”**

Refer to: <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf>

In addition the table in Appendix 1 of the document shows a delivery schedule in the form of a table. There is not a single entry at all under the headings “Delivery mechanisms (Where known) “ and “Delivery Timetable”, just 74 empty boxes in the table. How then can Panshanger residents have any confidence at all that the infrastructure will materialise, and how can we be expected to usefully comment on empty boxes as presented here? The addition of 700+ homes in Panshanger will severely detract from the quality of life that residents enjoy today, this document seems to offer no working solution and no timetable for that solution, in contrary to the directions expressed in the quoted government report above.

Web link:

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/draft\\_idp\\_jan2015?pointId=3251308](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/draft_idp_jan2015?pointId=3251308)

## WHBC Sustainability Appraisal of the Local Plan Consultation Document January 2015

1. The **Sustainability appraisal for WGC4 in Annex 1 and Table 4.3** is incorrect and not consistent with the guidelines for assessment in Appendix 2:

- Principal differences lie in the way distances have been underestimated in the assessment and the fact that the airfield is not a previously developed site.
- Other errors include: Insufficient weight has been given to the biodiversity of the site, the retention of local distinctiveness and historic environment, the removal of employment, training, education and leisure facilities with no consideration being given to the potential for increasing these with proper airfield management and the lack of school capacity or potential capacity within a 1400m walking distance.

When these errors are corrected, WGC4 is shown to be one of the least sustainable locations in the borough (this view was also expressed by the government planning inspector in 2004). Link below:

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/sustainability\\_appraisal\\_of\\_the\\_local\\_plan?pointId=7855#section-7855](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/sustainability_appraisal_of_the_local_plan?pointId=7855#section-7855)

2. The greater proportionality of settlement proposed by policy **CS3 at 4.36 to 4.53** has been negated by only selecting sites mainly around WGC and Hatfield. This is not the stated policy in the Appraisal report.  
[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/sustainability\\_appraisal\\_of\\_the\\_local\\_plan?pointId=d764170e11#section-d764170e11](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/sustainability_appraisal_of_the_local_plan?pointId=d764170e11#section-d764170e11)
3. Sustainability scores have not been used to rank the sites; sites are chosen which have low scores, whilst sites with higher scores have been shelved. Where does the assumption of sustainable development fit into “*the presumption in favour of sustainable development*” in the NPPF quoted in **3.2**  
[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/sustainability\\_appraisal\\_of\\_the\\_local\\_plan?pointId=d764170e11#section-d764170e11](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/sustainability_appraisal_of_the_local_plan?pointId=d764170e11#section-d764170e11)
4. In the assessment tables for individual sites **Table 2.1 objective 6.3** ‘enhance the vitality and attraction of WGC and Hatfield town retail centres’ should be replaced for village locations with “enhance the vitality and attraction of the village” to reflect the positive contribution new developments could make to the viability of the villages.  
[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/sustainability\\_appraisal\\_of\\_the\\_local\\_plan?pointId=d764170e832#section-d764170e832](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/sustainability_appraisal_of_the_local_plan?pointId=d764170e832#section-d764170e832)
5. **4.137 Sustainability appraisal for WGC4 in Annex 1 and Table 4.3** The Provision of primary and secondary schools is not adequately addressed in the appraisal of WGC4 especially since any school provision in East Herts will not be provided within the

plan timeframe and is too far away. The loss of provision for training and skills development on this site as well as further education links with the University of Hertfordshire are not acknowledged.

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_january\\_2015/sustainability\\_appraisal\\_of\\_the\\_local\\_plan?pointId=d764170e832#section-d764170e832](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_january_2015/sustainability_appraisal_of_the_local_plan?pointId=d764170e832#section-d764170e832),

Further comment and updates to this document will follow in coming weeks.

V1.0 Feb 3th 2015.

WHBC Information Board about the Local Plan:

**The Local Plan Consultation – Join the conversation**

## What happens next?

**January 2015**  
Local Plan consultation begins

**End of 2015**  
Final plan produced and further public comments invited

**Mid 2016**  
Examination in public by independent Inspector

**End of 2016**  
Plan to be formally adopted

## How to have your say

The best way to have your say is at [www.welhat.gov.uk/localplan](http://www.welhat.gov.uk/localplan)

Making comments online has the following benefits:

- It's easy – follow links to the parts of the consultation you are interested in – no wading through piles of paper
- Saves time – view and download documents and comment online anytime, anywhere
- Environmentally friendly – it saves paper

Once the consultation has closed, you will also be able to view and search comments made by other people.

If you are unable to comment online, you can also:

Write to:  
**Planning Policy, Welwyn Hatfield Borough Council, Council Offices, The Campus, Welwyn Garden City, AL8 6AE**

Email:  
[localplan@welhat.gov.uk](mailto:localplan@welhat.gov.uk)

If you need further information, call Planning Policy on **01707 357532**.

Find out more at one of our consultation events during January and February – see [www.welhat.gov.uk/localplan](http://www.welhat.gov.uk/localplan) for more details or look at paper copies at:

- Welwyn Hatfield Borough Council Offices
- Brookmans Park Library
- Cuffley Library
- Hatfield Library
- Welwyn Garden City Library
- Welwyn Library
- Mobile Library
- Woodhall Library

**LP**

[www.welhat.gov.uk/localplan](http://www.welhat.gov.uk/localplan)