

## Comments

### Local Plan Consultation Document January 2015 (23/01/15 to 19/03/15)

Comment by	Panshanger People (Mr Will Davis)
Comment ID	lpc487
Response Date	10/03/15 08:57
Consultation Point	1 Introduction ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.1

#### Files

Do you support the approach taken? (please select one) . No, object

#### Please state your reasons for supporting or objecting:

This submission is from the Panshanger People local civic group. We are a constituted group with an active committee who have been following the development of this local plan closely for the last two years. We have well over 1,000 members on our supporter list.

We submit the below comment to highlight issues to do with the process of this consultation thus far which we think deserve attention. It is our belief more effort should have been made to include our local residents in this consultation.

#### Regarding the last consultation and the Emerging Core Strategy responses from 2012/2013 :

As part of the last consultation (Emerging Core Strategy) the council consulted on its Statement of Community Involvement (SCI). Comments were received and the resulting document was adopted on Dec 3rd 2013. Some of the comments made when the SCI went out to consultation are still relevant to this new version. This SCI version was intended to guide the plan-making process in terms of public participation but is not referenced in this 2015 consultation, and many of the policies laid out within the SCI 2013 do not appear to have been used or referenced with regard to this current consultation. The SCI is very much focussed on plan-making so should have been quoted/referenced here in our view.

#### Specific points to address:

**The SCI states in section 3.1:** *"There are many individuals, groups and organisations in Welwyn Hatfield who will be given the opportunity to be involved in the preparation of planning documents and to comment on relevant planning applications."*

The Local Plan consultation document offers no information as to how groups across the borough have been pro-actively contacted and offered a chance to become involved in this consultation. Our experience is that many local groups knew little or nothing about it and were not contacted by the

council. Giving a group an opportunity must surely include making them aware of the opportunity in the first place.

**Section 2.2 of the SCI states :** *"the council has developed an electronic database of consultees to involve at various stages of the plan making process. This list is not fixed and those who wish to be consulted can be added to it."*

As has been said in the previous consultation, too much reliance has been placed on the electronic database as a means of engaging with the wider community. The database of consultees simply draws upon an already limited pool of pre-engaged (from previous consultations) respondents whose demographic is probably of a more uniform nature than that which actually exists in the local community. How can such a small sample define our community? The use of the online consultation portal requires people to have an email address at the very least, resulting in those not online or with little or no ICT knowledge being effectively excluded.

While it is true that many people do now use electronic means of communication there is no actual evidence in the consultation, in any case, that a genuine effort has been made to grow this database to the point where it may have some hope of becoming a representative sample. To our knowledge this hasn't happened as so far we can only see 3,600 online respondents which in a borough of 110,500 (2011 census) people represents a mere 3% of the population.

Also, have all the consultee bodies stated in 3.4, 3.5., 3.6 and 3.7 of the SCI been contacted to inform them that the consultation is happening and that they can register as a consultee? This is not evident at all.

**Section 3.8 of the SCI states:** *"Equally, It is very important that the wider community- people who live, work, run businesses and study in the borough – are consulted. Members of the public who would like to be notified about planning consultations and the progress of documents can add their details to the consultees electronic database."*

The 2015 consultation, like its predecessors in 2009 and 2012, has not involved an active dissemination of information in order to make the residents aware of what is being planned, of major impact, in their local community. There has been no specific and comprehensive explanation delivered to residents' addresses beyond the regular quarterly/half yearly WH Life magazine containing a perfunctory nod to the innocuous sounding "Local Plan". A casual glance as a Panshanger resident at the single A4 page Planning News of the Spring edition tucked away on page 7 might not even register the magnitude of the proposed development in their area. It is only with the application of a magnifying glass that anyone might realise that that black dot (without key) on the tiny map of the borough to the north east is actually something that might affect oneself. Panshanger, indeed none of the sites, are specifically mentioned by area. Is it any wonder that most residents appear ignorant of the council's plan. Again, how and where is the electronic database promoted? And how can those without electronic means find out about the consultation and express their view in a way in which they can easily engage?

Only one local event has been held in the Panshanger ward; it was not well advertised by the council and the turnout was low. The event itself was not signposted properly and those who went along struggled to actually find it. This does not reflect the expression stated above that public engagement is important to the council. If it were important, they would have written to residents and would have had posters/banners outside the school prior to the event, and would have had people on hand to guide people to it (especially at was very dark at the time). Our anecdotal evidence suggests most of those who attended only did so as a result of the information received via the door-to-door leafleting and emailing of Panshanger People.

The council's in house magazine which arrived on doorsteps 2 weeks before the end of the consultation has a paltry one page of A4 about this consultation (WH Life Spring edition). It makes no mention at all of the housing target for the borough, the council planned events to raise awareness of the consultation or provide any details of the proposed locations beyond a tiny 5 ½" by 3 ½" map of the entire borough showing various unexplained black dots. Why have they not taken the opportunity to publicise and expand upon these plans and events in their own magazine over the last two editions (Autumn Winter 2014 & Spring 2015)? It would have been useful to spell out that this consultation is chiefly about where 12,500 new ultimately go in the borough, what the council's current preference is, and why.

**Section 3.10 of the SCI states :** *"To inform this strategy a toolkit of best practice for working with community groups is being prepared which will be a useful reference for planning teams before the strategy is complete."*

The strategy is complete, the result was this draft local plan, this toolkit has never been referenced or mentioned, our local group would welcome such a thing but it has played no part in this consultation as far as we can see.

**Section 3.23 of the SCI states:** *"Resources will be targeted to where they will be used most effectively. Workshops and focus groups are resource intensive and will therefore be used where a more considered response is required or where there is an opportunity to consider a topic in more depth to encourage greater participation from particular sections of the community."*

There have been no workshops or focus groups for residents in the formation of this draft consultation. This group did request such but was told that none would be taking place due to the unpopularity of the council's stance with residents. No public 'town hall' style meetings have been held by the council regarding their draft plan. The closest residents have come to some form of local engagement was asking a few questions at the start of some council committee meetings. These questions were not clearly answered and no right of reply or follow up question was allowed. The questions made no difference at all to the committee voting pattern at these meetings, things seemed to have been decided in advance by the majority of councillors. Evidence of this can be clearly seen in this Youtube video shot by the council themselves: <http://youtu.be/lgsaFa4x7qo>

This local plan is hugely important and needs to be considered in depth by residents as is expressed as desirable in 3.23 quoted above, but this has not and will not happen. Public participation is focussed solely on those who are online and are capable of navigating this complex website. At our own public meeting held to help residents understand and comment on this consultation about 40% of the 100+ present said they would not be commenting online because they just could not or did not understand how to use it. This online focus does not reach out all to large sections of the community, in fact it can be a barrier to participation. As the council have not written at all to residents our group's experience talking to shoppers at local shops is that many people living locally either have no idea this is going on, or if they have heard of it have no idea what the summary headline details even are. This does not seem to constitute meaningful community involvement. These points were made during the last consultation in 2012/13 but this time around nothing has changed at all in terms of reaching out to local residents, despite the new SCI now being adopted.

As part of this group's attempts to inform local residents and facilitate them accessing and participating in this website consultation we have produced our own guide document explaining how to do it because the council have not fulfilled this function at all. We are aware that even council planning staff have been pointing struggling residents in the direction of the Panshanger People guidance on consultation portal use. Our how-to document has been a popular download on the Panshanger People website and has received local appreciation. It is of course no help for those who simply cannot respond online at all.

**The Plan Making consultation table in the SCI states :** *"We will consult with the wider community at least once during this stage in the production of the document."*

There is no evidence that the hundreds, if not thousands, of objections from residents in the last consultation regarding the proposals for WGC4 made any difference whatsoever. The plan being presented here for WGC is virtually identical to the last one. How does it motivate anyone to take part in a consultation if the current evidence suggests that any objection they make will be ignored?

This group has spoken to many residents about this plan and many believe it is all a done deal and whatever they say will yet again be ignored. How does this sit with the spirit and intention of locally led development as promoted in the Localism Act 2011 and the NPPF?

The table shown in the SCI also states the below, see comments in bold:

*"We will use a range of types of consultation during this stage in order to understand key issues and views. Methods will include one or more of the following:*

*How will we consult*

- 1 *Surveys and questionnaires . - **We are not aware of any of these taking place***
- 2 *Correspondence through letters or email . - **No letters have been sent to residents informing them the consultation is taking place.***

- 3 *Workshops or focus groups* . - **Neither of these have taken place.**
- 4 *Drop-in events, displays or exhibitions*. - **A short series of events took place. Our local one was not well publicised by the council and then poorly attended. Many residents actually struggled to find it tucked away in the dark at the back of a local school. We believe many of those who attended only did so as a result of the door-to-door leafleting and email carried out by Panshanger People alerting them to this roadshow.**
- 5 *Meetings (one to one or group)* . – **Panshanger People group has instigated a few group meetings itself.**
- 6 *Make plans available on our website and at public inspection points (council offices and local libraries)*.
- 7 *Targeted measures for hard to reach groups* - **We are not aware of any targeted measures, such as visits to community group settings such as day centres, visits to local shops in Panshanger, town hall or community centre public forums. Consultation documents have not been made easily accessible to those in Panshanger who are not online. Paper forms for responding have not been distributed by the council in our local area. Our local voluntary group has sought to do so but is limited in time, capacity and resources. ”**

If local objections are again pushed aside and the WGC4 site goes forward for development the SCI states that the above methods will also be deployed in the next stage, the development of an Supplementary Planning Document (masterplan). How can we have any confidence that any of these methods will be then implemented as so little has been implemented so far, as highlighted above?

**Section 4 of the SCI states:** *" It is important to recognise diversity within the borough and to consider the potential needs of all sections of the community, including those who do not have such a well developed culture of public participation. The council recognises that the planning system can seem complex and confusing and this can prevent some people getting involved."*

It is unclear what the council have done to consider the needs of those in our local area unable to access or understand the online consultation. Participation in the last consultation was very low in our area until we took action ourselves to inform people, it will be the same this time around. Older people and young adults do not seem to have been targeted as hard to reach groups as far as we can see. Even the email database run by the council is not well publicised. For those not online it is unclear how they are supposed to find out about this consultation, unless they come into contact with our local group.

**Section 4.5 states:** *"The council's monitoring tells us that young people faith groups and sections of the community living in more deprived areas of the borough tend to be underrepresented or 'harder to reach' during consultation. To a lesser degree, women are often under-represented."*

We also acknowledge this but what action has been taken to improve engagement in this consultation? None that we are aware of, having all this documented in the SCI is meaningless unless it's actually followed through.

**Section 4.8 of the SCI States:**

*"Councillors have a key role to play in plan-making. They are involved in decision-making as plans and strategies are agreed by the relevant planning committee and approved by the council's Cabinet. In addition, the full council must approve Local Plan documents before they are submitted for examination or adoption."*

Our local councillors have played no apparent role in seeking to get the council's Cabinet to act in a way that represents what local people want. Our most influential councillor is also executive member for housing. Despite many hundreds of letters and emails from residents, and despite many pleas from our local group to actually represent the view of most residents on the development of our area he has singularly failed to do so. In December he twice voted to make WGC4 a more favourable site for development, despite much local opposition before and during those meetings. He states that he has to wear two hats while working both as executive member for housing and our local councillor, but he chose to accept the former role last year, while already serving as a councillor representing Panshanger ward. He knew then that this conflict of interest would turn out to be a major issue. Despite an earlier written pledge that he would oppose development on the airfield he has shown no opposition at all, and has actually voted for it to become a more favourable site instead. Local residents have told us how displeased they are at his lack of support and representation, despite earlier promises. The key role that this councillor has had in plan making is to facilitate the inclusion of the WGC4 site, in our

view this is in direct opposition to the will of the majority of those he was elected to represent. Is it any wonder there is deep scepticism about the state of our local democracy.

This group makes all these points to highlight how residents of our area have not been served well by this process so far, despite the new SCI document spelling out what is supposed to happen. We hope that all these points will be considered both by the council's planning team and ultimately by the Planning Inspector.

**Does a change need to be made? (please select one)** . Yes

**If you are suggesting a change, please state what it is:**

WHBC should implement all the policy and guidance laid out in the Statement of Community Involvement, that document should be referenced in this consultation. Local residents should have at least one direct communication about this consultation. Local councillors should represent their constituents fully and be their voice at the local government level, and not ignore their repeated pleas. They should not be permitted to wear two hats if it impedes their ability to represent their constituents on this matter.

Adopted Statement of Community Involvement (3 December 2013)

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**

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<b>Comment by</b>	Panshanger People (Mr Will Davis)
<b>Comment ID</b>	lpc488
<b>Response Date</b>	10/03/15 09:07
<b>Consultation Point</b>	Site WGC4 ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Do you support the approach taken? (please select one)** . No, object

**Please state your reasons for supporting or objecting:**

**Re 10.21:**

What is structural landscape belt, there is no definition? How can residents be expected to comment on this with no details?

Is the plan not to spoil the views of those on the Tewin side of the valley or driving along the B1000. Why is it ok to spoil the view for existing residents who will not have this new development, and potentially a traveller site, obscured from their view at all?

The site already is a meaningful resource for wildlife and passive leisure purposes where people can enjoy the peace and quiet, sweeping views and the sounds of nature. It will be far less so if the proposed houses and traveller site is put in. Residents who use and know the site already appreciate it as 'green infrastructure' - or the natural environment as it's referred to in the real world. How can designing green infrastructure provision do anything other than detract from the level of greenery that exists on the site today. It should be noted here that this council has chosen not to survey or acknowledge the fact that this is a natural landscape with the flora and fauna that this attracts.

Claiming that it's an opportunity to create a 'green infrastructure link' to Panshanger Park is stated as a good thing in this plan. This is in stark contrast with the situation at BrP9 in Brookmans Park where in section B.21 it states:

**"Development would further have a potentially harmful impact on the setting of the adjacent Gobions Wood Historic Park and Garden."**

How is it then that BrP9 is declared a **less** favourable site because of its proximity to the historic Gobions park, and yet WGC4 is **more** favourable partly **because** of its proximity to historic Panshanger Park? Panshanger Park is also a grade 2\* listed site as well as a nature reserve, whereas Gobions Wood is not a listed site. See <http://friendsofpanshangerpark.co.uk>.

In addition, WGC4 is around three miles from WGC railway station, whereas BrP9 is about 500 meters from the mainline station at Brookmans Park.

These points clearly show why there is a common perception in Panshanger that there are two standards in operation when it comes to how these sites have been selected and assessed so far. The same dual standard that was apparent during the last consultation when ONLY WGC4 and the big Hatfield sites were put forward.

**Does a change need to be made? (please select one)** . Yes

**If you are suggesting a change, please state what it is:**

A fair and equal transparent evaluation of all sites in the borough, a proper survey of the ecological value of the WGC4 site and recognition of its landscape value, not least its areas of unimproved grassland. More about unimproved grasslands can be found here: <http://www.cutandchew.org.uk/index.php/grasslands/show-do-i-know-if-a-grassland-is-valuable-for-wildlife/unimproved-grassland.html>

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**

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<b>Comment by</b>	Panshanger People (Mr Will Davis)
<b>Comment ID</b>	lpc503
<b>Response Date</b>	11/03/15 08:13
<b>Consultation Point</b>	5 CS4 Green Belt Boundaries and Safeguarded Land ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

## Files

Do you support the approach taken? (please select one) . No, object

### Please state your reasons for supporting or objecting:

**Section 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."*

Whilst there is a need for Gypsy and Traveller sites in the borough, as in all boroughs, the council seem to have placed the proposed site in WGC4 actually within the proposed 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.

Also, the council's larger report from 2012 assessing the needs of travellers and show people states on page three in the executive summary:

*"It is estimated that a total of 25 permanent site pitches may be required within the next 5 years to meet existing need. Beyond 2016, demographic growth and household formation is likely to lead to a need for additional pitches and this has been calculated using a 3 per cent compound growth approach between 2016 and 2026. This indicates a potential need for an additional of 29 pitches ."* - That report is attached to this comment.

Bearing this in mind section 3.5 of the 2015 consultation document contains the following:

*"The council's evidence base includes its Gypsy and Traveller and Travelling Showpeoples' Accommodation Needs Assessment. Paragraph 9.24 of the Emerging Core Strategy set out the need for 25 pitches between 2011 and 2016, with demographic growth and household formation likely to lead to a need for a further 29 pitches between 2016 and 2026. On the same basis, demographic growth and household formation may give rise to the need for a further 17 pitches between 2026 and 2031. This equates to a total of 71 pitches."*

It is not how the two statements above tally with each other. The first says 29 new pitches in total across the borough up to 2026, and the second seems to say that the final total is 71... more than a doubling of new pitches in the last 5 years of the plan. Either the formula here is not well explained or the numbers as presented simply don't add up?

The report carried out in 2009 was also used in the evidence base, titled

### **"Welwyn Hatfield Core Strategy**

#### **Consultation with the borough's Gypsy and Traveller community on the provision of additional pitches**

##### **Report of consultation"**

This report had a very low response rate, but it does reveal that only one third of travellers who participated were in favour of living alongside new housing. It also said 93% of respondents wanted to be near public transport.

In the context of the proposal for a traveller site within WGC4 this doesn't add up. The pitches would be within a new development and the scant bus service to this part of the borough hardly qualifies a good public transport (the station is 3 miles away of course).

It is also noticeable that there are no sites defined in the southern part of the borough (only in WGC, Hatfield and Welham Green). Do travellers and gypsies not want the opportunity to move around the whole of the borough? Is there evidence that they were recently consulted in any case about this in the formation of this plan? The data seems quite old and the sample of households is low.

Where is there any evidence that potential pitches in the southern half of the borough have been explored, can we see this evidence? Overall it appears that the traveller community itself has played at best a minimal role in the formation of this plan regarding pitch locations, how does the council know what the current views of the traveller community are, in relation to where the majority of them would choose to live? It's not evident here.

If WGC4 is to house 15 of the new pitches that is either 50% or approx 25% of all new pitches in the borough (depending on which figure is actually correct - see above). Again the dispersal of homes and traveller pitches across the borough is very lopsided with WGC and WGC4 in particular bearing the brunt while many other areas get no allocation at all. This consultation document offers no explanation as to why the WGC4 site GTLAA006 is more preferable in comparison to countless other possible locations across the borough.

**Does a change need to be made? (please select one)** . Yes

**If you are suggesting a change, please state what it is:**

More comprehensive and current evidence as to why the traveller site proposed within WGC4 is the preferred option. As with housing an approach should be taken that more fairly distributes traveller sites around the borough. If localism means anything at all residents in the vicinity should be consulted about this proposal (i.e. written to) and their views duly considered and reflected upon before any decision is made.

WHBC traveller assessment 2012

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**

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<b>Comment by</b>	Panshanger People (Mr Will Davis)
<b>Comment ID</b>	lpc502
<b>Response Date</b>	11/03/15 07:54
<b>Consultation Point</b>	Housing ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Do you support the approach taken? (please select one)** . No, object

**Please state your reasons for supporting or objecting:**

Section 3.2 states "*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.*"

Bearing this in mind, on the 5th March 2015 Housing Minister Brandon Lewis said in a House of Commons debate (important sections are emboldened):

"Plan making can be challenging, because it involves difficult decisions about how an area will develop in the future and about meeting development needs while **protecting sensitive environments and valued green spaces** . I have taken on board the points that my hon. Friend Martin Horwood made on that matter and will get back to him on them, if he will bear with me. That is why it is important that local **plans should be supported by a credible and robust evidence base and that a wide range of people should be involved in plan preparation** . **Plans should be proportionate and accessible** , and the framework already strongly supports such objectives.

**We do not ask local authorities to build more homes than they need, and we do not tell them how many homes they should build** . Our planning guidance recommends the use of a standard methodology to help authorities assess local housing needs, using secondary data sources where possible. **However, local authorities, which are best placed to understand their local needs, are given the ability to decide what approach is appropriate for them, with that understanding of their area.**

Policy is absolutely clear that need does not automatically equal supply. I, too, want to be clear about that. Identifying housing need is the first step in the process. Local authorities must then determine whether they have sufficient land to meet that need. In doing so, they are expected to take into account the policies in the framework. In effect, stage 1 is the need, unencumbered by policy, and stage 2 is about policy and environmental constraints, as clearly outlined in the NPPF. Again, I stress that councillors should make themselves aware of all of the NPPF, not only the odd paragraph that their officers might sometimes drive them towards. For example, national parks and areas of outstanding natural beauty have a high status of protection in recognition of their landscape and scenic beauty. The Government attach the highest importance to the protection of green belt. **Our new guidance in October last year re-emphasised that importance, adding that the presence of constraints might limit the ability of planning authorities to meet their needs."**

The Hansard entry with this text can be found here:

<http://www.theyworkforyou.com/whall/?id=2015-03-05a.363.0#g396.1>

The point being raised by ourselves is that it is clear from Minister Lewis's statements that our borough is able to determine its own target and your terms **significantly** and **demonstrably** may be overstating that number. When meeting targets it is completely appropriate and necessary to recognise constraints which are clearly evident, yet these have not been given sufficient weight. As stated, authorities are best placed to decide their approach, and also as stated a wide range of people should be involved in plan preparation. It is certainly not clear to us who that wide range of people were in Welwyn Hatfield. The views expressed in the last consultation have not changed what is being offered here, two years later. The council may have an understanding of the area, but so do local people, many of whom have a far longer association with the town than does the planning department. Why is this local knowledge not sought and used in the making of this plan? It seems to be purely the work of planning officers with little evidenced effort to actually involve a range of local people in plan-making.

Lastly, it says plans should be proportionate and accessible. This consultation is really only accessible to those with proficient IT skills and the means to get online. Accessible also means that they know about it, so they can access it if they so choose. As commented elsewhere local awareness of this consultation is limited. Secondly, we feel this plan is not proportionate as it seeks to put too many new homes on the edge of WGC and does not take into account the bounded nature of our unique garden city. A proportionate plan would seek to spread homes far more evenly across many more sites in the borough.

Brandon Lewis's words above are noteworthy, and WHBC would do well to consider and act on them. Regardless of pressure from developers for even more homes than the current target. The planning department should do what is right for the town and its current residents, not what is right for landowners and construction companies with deep pockets and legal teams on standby. No doubt they will all chime in at the end of this consultation saying the borough needs a far higher housing target, as they did last time. This council should be strong enough to resist and it should also resist pressure to build 700 homes on Panshanger Airfield, which at this point is still an airfield and has a recognised status in the NPPF, despite the message put about to the contrary by some less well informed councillors.

**Does a change need to be made? (please select one)** . Yes

**If you are suggesting a change, please state what it is:**

The housing target should not be seen as immovable and dictated by statistics from central government. Housing should be more evenly dispersed across the borough. There should not be this massive housing appendage in the form of WGC4.

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**

## Draft Infrastructure Delivery Plan Revised January 2015 (23/01/15 to 19/03/15)

<b>Comment by</b>	Panshanger People (Mr Will Davis)
<b>Comment ID</b>	lpcidp30
<b>Response Date</b>	09/03/15 00:38
<b>Consultation Point</b>	13 Utilities ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### Files

Please give your comments here:

#### Re waste water in section 13.24, 13.25, 13.26:

Sewers from the Panshanger 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. However, many sites in the southern areas have been deemed less favourable or finely balanced and so are not the focus of this consultation.

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.”

The report is attached to this comment.

The above factors do not seem to have been properly considered in the draft Local Plan. The how, where, when of the infrastructure provision, including waste water, is not stated, even for the first five years of the local plan.

Does a change need to be made? (please select one) . Yes

If you are suggesting a change, please state what it is:

In line with House of Commons recent recommendations this Delivery Plan document should be a genuine delivery plan that spells out the how, where, and when of infrastructure provision, for the first five years of the plan and preferably beyond.

House of Commons DCLG report Dec 2014

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**

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<b>Comment by</b>	Panshanger People (Mr Will Davis)
<b>Comment ID</b>	lpcidp31
<b>Response Date</b>	09/03/15 00:39
<b>Consultation Point</b>	1 Introduction ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Please give your comments here:**

Re 1.12 and 1.13

This IDP is an important element of the local plan, as stated here. This document is said to be evolving but as it currently stands there is very little actual plan, it's mostly a wish list of things that will be needed, the delivery element is lacking. It seems unrealistic to expect residents to be in a position see this IDP document as serving its intended purpose in it's current guise. Therefore it's difficult to comment on it as much of the important information it needs to contain is currently missing.

**Does a change need to be made? (please select one)** . Yes

**If you are suggesting a change, please state what it is:**

Local residents should be asked to comment on an IDP that has far more detail on the deliverables and that contains a funded delivery timetable.

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**

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<b>Comment by</b>	Panshanger People (Mr Will Davis)
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<b>Comment ID</b>	lpcidp29
<b>Response Date</b>	09/03/15 00:37
<b>Consultation Point</b>	6 Education ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Please give your comments here:**

**Re education provision and the WGC4 Panshanger proposals:**

The proposed 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. We have also been told by the councils planning team that up to three secondary schools would be needed, assuming the WGC5 and WGC4 proposals go ahead.

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.

The IDP does not go far enough in offering an actual delivery plan for this very important requirement. Currently there seem to be far too many unknowns, not to mention assumptions about what East Herts might (or might not) chose to do.

**Does a change need to be made? (please select one)** . Yes

**If you are suggesting a change, please state what it is:**

This IDP needs to contain far more actual detail about how the education requirements will be funded, located, and to what timescale.

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**

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<b>Comment by</b>	Panshanger People (Mr Will Davis)
<b>Comment ID</b>	lpcidp28
<b>Response Date</b>	09/03/15 00:36
<b>Consultation Point</b>	10 Green Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	

**Please give your comments here:**

Re section **10.6:**

Building on WGC4 (Panshanger) 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, 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.

We are aware that the 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” 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.*

Also:

*“First, we must take steps to ensure that the planning system delivers the sustainable development promised in the NPPF. We should ensure that the same weight is given to the environmental and social as to the economic dimension; that permission is only given to development if accompanied by the infrastructure necessary to support it; and that the planning system places due emphasis on the natural environment.”*

and...

*“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.”*

The report quoted above is attached to this comment.

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, as the above guidance recommends?

**Does a change need to be made? (please select one)** . Yes

**If you are suggesting a change, please state what it is:**

More weight should be given to the natural environment in this IDP. It appears that the economic aspect is given most wieght in this IDP and in the draft local plan. What ecological skiils have been brought in from elsewhere as suggested above? As far as we are aware no independent surveys have been done on the WGC4 site which undoubtedly contains natural habitat and ecosytem. At this point not even the biodiversity checklist which covers protected species has been undertaken on the WGC4 site. This council appears not to have acknowledged the wildlife and rare unimproved grassland that exists on the site, it is a living landscape as the woodland arc section sets out. This IDP document should acknowledge the environmental value of the Panshanger WGC4 site.

House of Commons DCLG report Dec 14

**We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.)** No

**How did you hear about this consultation?**