

## Response to “Early Engagement” consultation on the new local plan (Nov 2024)

### Introduction

This response to the Borough’s “Early engagement” consultation on the Borough’s new local new Local Plan is made by the North Mymms District Green Belt Society. The NMDGBS has existed since 1976 and currently has around one thousand members. It was actively involved in the consultations for and examination of the current Local Plan.

We hope for a similar involvement in the preparation of the new plan but would like to express our fears that the public is weary of lengthy consultations particularly when they perceive that their responses are ignored or otherwise set aside because of central government policies.

Only now are members of the public awakening to the reality of the extent of building in what were Green Belt areas.

This comment focusses on the headings used in the Council’s engagement website.

### 1. What are your aspirations for the Borough?

**1.1.** We should like to see the Borough retain its inherent characteristics as a pleasant and well-functioning place to live surrounded by the Hertfordshire countryside and conveniently close to London. This will be difficult to achieve under the challenge of continuous forced expansion.

**1.2.** Inherent characteristics of the Borough.

**1.2.1.** Welwyn/Hatfield Borough is something of an artificial construct combining two towns each with its own history and character. They are surrounded by a substantial number of rural or semi-rural villages and settlements of various sizes. The glue, which holds the Borough together is provided by the Metropolitan Green Belt. Even after the changes brought by the current Local Plan the Green Belt accounts for some three-quarters of the Borough area. It is a core element of the Borough’s make-up; not just an awkward constraint on development but a vital contributor to the health and well being of the local community.

**1.2.2.** The new local plan must include a positive policy to safeguard the Green Belt and seek to improve the contribution it makes not just for strategic planning but also

for recreation and mental health.

**1.2.3.** Without such policies it is entirely foreseeable that Welwyn Hatfield will, in a few years, become a continuous linear built up area from Potters Bar to Stevenage. And unless there is positive co-ordination with adjacent boroughs, in that process, Hertfordshire will disappear like Middlesex and be absorbed into Greater London. All planners will declare that that is not their intention but unless there is a positive plan to stop it happening there is a strong prospect of that becoming the reality.

## **2. Working**

- 2.1.** We would be opposed to the allocation of Green Belt sites for additional industrial or commercial development.
- 2.2.** In preparing the current Local Plan, the council's decision to expand economic development by growing employment numbers had unfortunate consequences for the OAHN: the inspector insisted that sufficient housing had to be provided since to encourage inward commuting was not sustainable. The council needs to avoid this presumption when preparing the new Plan.
- 2.3.** Though it appears that more people commute into the borough for work than commute out, housing development near both Welwyn Garden City and Hatfield stations has increased significantly in recent years undoubtedly increasing commuting by train: 18% of borough residents work in London. Astonishingly, 37% of the working population work from home – a figure that needs to be revisited post covid. Commuting to work is a fact of working life and commuting over the borough boundary is not of itself "unsustainable".
- 2.4.** There have been significant changes from the original industrial components of both Hatfield and WGC. There are opportunities to reimagine the use of space as has happened most notably with the Hatfield airfield site and the Wheat Quarter.
- 2.5.** The University of Hertfordshire has expanded its student numbers in recent years. Its desire for additional space needs to be kept under close review as also does its impact on local housing need for students.

## **3. Environment**

- 3.1.** To a very large extent new plan's approach to the Green Belt will determine the success of its environmental policies.

- 3.2.** We find it extraordinary that while the consultation prompts on the council’s website refer to the many notable wildlife sites and important woodland areas in the borough, there is no mention of the countryside as such or the fact that some three quarters of the borough comes within the Green Belt. Nor does there appear to be any mention of agriculture.
- 3.3.** One of the primary purposes of the Green Belt is to preserve the openness of the countryside.
- 3.4.** The new local plan should have positive policies which actively promote this objective, to protect and develop the environment having regard to climate change, physical recreation, mental health and the economics of agriculture and also encourage access to the countryside.

## **4. Living**

- 4.1.** In our view the starting point for housing expansion should be the population figures for natural population growth. We don’t agree with a policy of calculating housing numbers by a nationally imposed formula.
- 4.2.** The Local Plan (para 2.11) explains, using the ONS population projections for 2021, that natural population growth for the borough “...equates to forecast growth in the number of households in the borough of 9,300 over the plan period.” During consultation on the Plan, the NMDGBS, and indeed others, submitted much evidence which supported that figure. The figure of 15,200, the objectively assessed housing need (OAHN) adopted by the plan, is the result of massaging by various formulas required by central planning. It does not reflect local need and, to the extent possible this approach should be resisted in the preparation of the new local plan.
- 4.3.** There is a widespread assumption that the majority of new development in the borough will be on land that is now within the Green Belt. We believe this easy assumption should be resisted and we reject it as the starting point.
- 4.4.** The Green Belt is not some convenient inexhaustible supply to be turned to just because it is there. The Green Belt performs specific functions as set out in the NPPF; once subsumed by development it is gone forever and the functions which it served irreparably damaged.
- 4.5.** As acknowledged by the Local Plan (para 2.10) some areas of Hatfield and Welwyn Garden City, are becoming tired and in need of regeneration and revitalisation. We believe that opportunities arising from these areas as well as opportunities from

changes in retail and office requirements should be explored to the full as also should the redevelopment of brownfield sites. Every effort should be made to exploit these sites to the full and to press for their redevelopment in a timely manner. The time taken to regenerate the Wheat Quarter in Welwyn Garden City stands as a very bad example of current practice.

- 4.6.** New development should positively complement existing local communities rather than be ad hoc add-ons. It is important that the balance of housing type reflects the needs of the borough. In this connection we think that the practice of “calling for sites” leads to development in places and in type of housing that are less than optimal. We believe that accommodating any expansion should be led by the Plan and not dictated by landowners and developers. The “call for sites” takes the initiative away from the Plan. It adds cost through the examination process and can result in badly connected pockets of housing that maybe satisfy the developer’s desire for profit but not the borough’s need.
- 4.7.** The Council should avoid the mistake made during the preparation of the current Plan when, rather than deciding on the most appropriate places for development, it chose, as a matter of principle to “share the pain.” This led to lengthy argument with the inspector and in our view mistaken decisions. There is also a strong view that the Green Belt in North Mymms Parish has been disproportionately damaged.

## **5. Movement and Infrastructure**

- 5.1.** It is important that the new plan focusses as much on infrastructure as on housing numbers.
- 5.2.** We want a local plan that is not merely driven by imposed targets for new housing but which provides for a balanced expansion of our communities with roads, schools, medical facilities, and other infrastructure such as water and sewage properly funded and provided.
- 5.3.** It is disheartening that the current Plan specifically did not address what was referred to as “the infrastructure deficit”. This is a mistake which should not be repeated.
- 5.4.** Particularly as regards roads and sewage there appears to be an assumption that the system will cope and that the relevant authorities will provide as necessary. In our view, upgrades and new facilities should be planned along with the increase in housing numbers.

- 5.5.** There seems to be a view in the transport community that the existing road structure will support just about any expansion of housing.
- 5.6.** A particular example in the current Plan is site HS22, Land west of Brookmans Park station, where Bradmore Lane, a small country road, is deemed to be sufficient to support the additional through traffic from the new site. Furthermore, legitimate concerns on the danger of the access on to the busy Station Road are simply ignored.
- 5.7.** A realistic approach to the impact of new development on the existing community should be a basic principle of the new Plan.
- 5.8.** In this connection we draw attention to the importance of Section 106 Agreements. We believe that local concerns should be allowed to influence these; that they are not just agreements drawn up by council officials but that they should be open to some sort of consultation process with local councillors and communities.
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