

North Mymms District Green Belt Society

Local Plan
Planning Policy
Welwyn Hatfield Borough Council
Council Offices
The Campus
Welwyn Garden City
Herts AL8 6AE

18.3.15

Dear Sirs

As Secretary of the North Mymms District Green Belt Society I am writing on behalf of over 1,500 residents of North Mymms Parish, who are members of the North Mymms District Green Belt Society, to object most strongly to the Local Plan which proposes houses being built on Green Belt land in the Parish.

(1) Secretary of State for Communities and Local Government, Eric Pickles MP stated on 4.10.14 (updated 6.10.14 <https://www.gov.uk/government/organisations/department-for-communities-and-local-government>) that this:-

"Reaffirms how councils should use their Local Plan, drawing on protections in the National Planning Policy Framework to safeguard their local area against urban sprawl, and protect the green lungs around towns and cities."

"Housing Need - including traveller sites - does not justify the harm done to the green belt by inappropriate development."

"Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area."

"Assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period and in so doing take account of any constraints such as green belt which indicate that development should be restricted and which may restrain the ability of any authority to meet its need."

"Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute 'very special circumstances' justifying inappropriate development on a site within the Green Belt."

(2) We object to the fact that the evidence used by WHBC apparently comes from a Report of SHMA carried out by consultants for the WHBC. This Report is not available for viewing or commenting on as part of a Response to the Public Consultation. How the figures of 6,800 - 12,500 have been arrived at is not open to public scrutiny.

(3) The present local infrastructure cannot withstand further housing development. Sound, and if necessary new, infrastructure should be in place prior to any sites being allocated.

(4) Housing Need target figures are too high.

The urban figures are understated and do not include commercial to residential conversions. Job creation figures are overstated. The Local Economic Partnership expects the A1(M) growth area to produce 19,000 jobs by 2030, mostly in Stevenage. How then does the Local Plan predict 12,000 in Welwyn Hatfield?

We attach a 4-page document of independently compiled statistics which shows a middle figure of Housing Need at 8,000.

We note that The Emerging Core Strategy states (para.3.2) the Council should ensure that the Plan meets full needs as far as is consistent with policies set out in the NPPF. CS2 (Meeting Needs for Growth) 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.

The Planning Practice Guidance (para 83) states that "Once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The "Exceptional Circumstances" necessary have not been met as the Council has not justified the proposed housing target.

(5) We would make the point that the Green Belt sites selected by the Council for proposed development in North Mymms all have their own importance in serving the functions of Green Belt policy. They have all stood the test of time, in spite of the aggressive attention of developers. Defining the function of the Green Belt is not an exact science. These sites can be meaningful boundaries, create open spaces, rural barriers between settlements and opportunities for leisure activities. These include cycling, horse riding, hiking, jogging or even just enjoying a pleasant walk. A number of the fields provide grazing for the many horses stabled in the Parish. Without these fields the young and old would be unable to continue a traditional and healthy activity. People from other towns and villages, even the Boroughs of London come to North Mymms for these recreational pursuits. The loss of the Green Belt is not necessary as settlements could be built in other areas not in the Green Belt providing real affordable housing and not this ad hoc planning.

(6) Section 4.1 in part CS3 Settlement Strategy of the Local Plan Consultation Document states "The council now proposes a more proportionate and more dispersed pattern of growth to meet the housing needs of the borough." Why then are a disproportionate number of all the proposed Gypsy and Traveller Sites in Welwyn Hatfield located in Welham Green?

(7) Why does the Local Plan predict fewer windfall housing completions in the future? Windfall predictions should be led by windfall in the past, reducing the need for sites in the Green Belt. CS3 includes only 532 windfall residences at 38 per annum (Table 1). Yet 357 dwellings have been created since June 2013 by change of use from offices to residential. Also 480 dwellings have become available due to Care Home provision and should be added.

(8) It is essential that the sites at New Barnfield and Marshmoor are retained within the Green Belt. Any development at New Barnfield weakens the boundary between Welham Green and Hatfield leading to coalescence. Development WeG4b at Marshmoor creates "Ribbon Development" along the A1000. Planning permission for a Waste Incinerator at New Barnfield was refused in 2014 and a Planning Application for a large development on Marshmoor has been refused on several occasions in the past.

Part 3 of the Local Plan Consultation Document, S2 Meeting the Needs of Growth, Sub Section Policy Intention CS2B (para 3.21) statement includes the following:-

"If the approach of allocating sites in the Green Belt for employment land is adopted, these sites will have to perform so well and be so attractive to investors in life sciences that exceptional circumstances exist for altering the Green Belt boundary for strategic allocation. As well as the deliverability of the proposal the council will take following into account:

- Area is close to a railway station and easily accessible by road, including by local bus services
- Area is adjacent to existing settlement boundary and would not result in coalescence between
- Area is well related to existing local amenities settlements
- Area is a suitable location for life sciences

Development of We4b would result in coalescence between Welham Green and Hatfield

(9) Wildlife Sites. Long term objective 4.6 in the Sustainability Appraisal of the Local Plan Consultation Document is stated as "Protect and enhance biodiversity and geo-diversity, taking into account climate change."

11 of the 19 sites in North Mymms, proposed in the Local Plan Consultation Document, are either adjacent to or within 250m of designated Wildlife Sites and areas of Ancient Woodland and have therefore been assessed as at risk of "Significant effect". The selection of these sites appears to seriously compromise the achievability of objective 4.6.

All information taken from "Strategic Housing Land Availability Assessment (SHLAA) Phase 2 - December 2014 Review "

- WeG1 - Mitigation due to proximity of sites with nature conservation interest
- WeG2 - Mitigation due to proximity of sites with nature conservation interest
- WeG3 - Mitigation due to proximity of sites with nature conservation interest
- WeG4b - Mitigation due to proximity of sites with nature conservation interest
- WeG6 - Mitigation due to proximity of sites with nature conservation interest
- WeG10 - Mitigation due to proximity of sites with nature conservation interest
- BrP4 - Adjacent to Wildlife Site (WS14) part of Ancient Woodland
- BrP9 - Adjacent to Wildlife Sites (WS150 and WS158)
- BrP10 - Adjacent to Wildlife Sites (WS 150 and WS 158)
- BrP12 - Adjacent to Wildlife Site (WS146)
- BrP14 - Adjacent to Wildlife Site (WS 165)

We would question the recent unpublicised removal of the validity of WS94 as a designated Wildlife Site (WeG6)

(10) We understand that the site WeG10 has been put forward by Welwyn Hatfield Council without the consent of the owner, and the owner is not willing to sell this site for development.

(11) The Welwyn Hatfield Borough Council's Green Belt Review Stage 2 October 2014 "Findings of Part 2" states "Nearly half of all the sites assessed also make a significant contribution to the third

national Green Belt purpose of protecting the countryside from encroachment. This is a probable reflection of the fact that, when they were originally defined, Green Belt boundaries were chosen carefully and that, since their definition, the local planning authority has been rigorous in preventing inappropriate development in the Green Belt." Does the present Council aim to change this historic policy?

CS4 - Green Belt Boundaries and Safeguarded Land (para 5.3) states that for plan making "local authorities should positively seek opportunities to meet the development needs of their area." However, it also states that "Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted."

Crucially, Green Belt is identified as one such policy. (Government letter 13.3.14 para 3 to Planning Inspectorate Bristol.

(12) At public meetings when details of the Local Plan were first announced the extremely high Net Housing Figure was queried by our Society. Since that time the figure has been reducing and we now believe to be in the region of 5,500. We are confident that this figure will be even lower when the policy of converting offices to flats is fully taken into account. The Council should now follow the Government's laid down policy of taking into account the constraints of the Green Belt when assessing Housing Needs within the Local Plan. This reduction would make an easily manageable total to be fairly distributed.

The creation of 1,200 new jobs is speculation and does not conform to other government statistics. For example The Local Economic Partnership stated that there are no very special or exceptional circumstances to permit building on the Green Belt to cover the estimated total.

In conclusion, we do not agree with Welwyn Hatfield Council's interpretation of the Government's Green Belt Policies in various documents relating to the Local Plan. The Council has stated that 40% of Housing Need will have to come on Green Belt land. We believe that Exceptional Circumstances do not exist and Welwyn Hatfield Borough Council have not taken into account the constraints of the Green Belt in the Local Plan.

Eric Pickles MP who is in charge of Housing and Planning says that the Government Policy is the Law and states "Meeting housing numbers is not Exceptional Circumstances. It is the law. No building on the Green Belt." (<http://www.lbc.co.uk/watch-eric-pickles---live-on-lbc-at-7pm-106547>)

We look forward to receiving the revised Local Plan Housing Figures which take into account these constraints on the Green Belt. This will enable us to respond accordingly.

Yours faithfully

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Carol McCarthy Secretary - North Mymms District Green Belt Society
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Enclosure - 4 page "Welwyn and Hatfield Population Changes 2001-2011"

Welwyn and Hatfield Population changes 2001-2011

1991	2001	2011	2021	2031
93800	97500	110535	123100	135400
	+4.1%	+13.3%	11.4%	9.9%

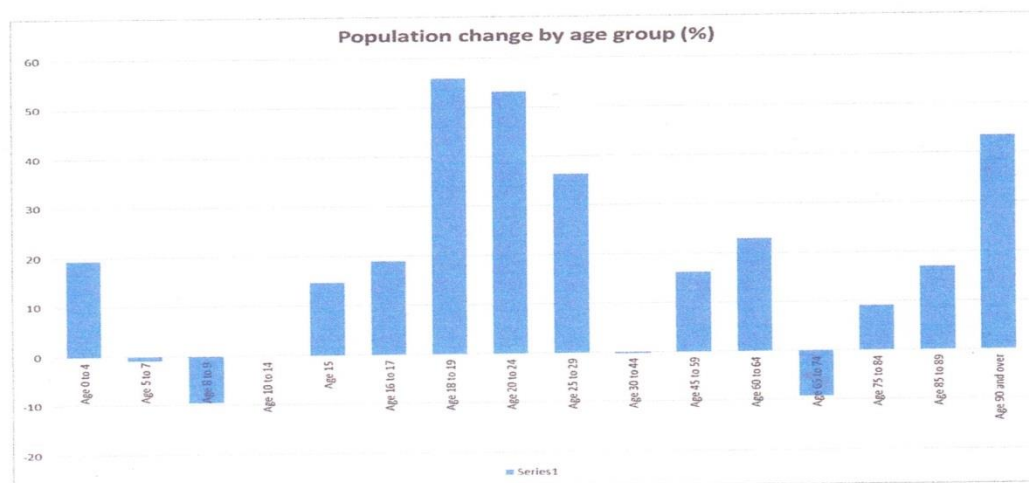
Why did the population increase between 2001 and 2011.

- (1) University of Hertfordshire (UH) student population increased from 21695 to 25130 in 2013. An increase of 3430. There would have also been an increase in teaching staff. Although this does represent a real increase the trend will not necessarily continue.
- (2) There are 5200 international students at U H. These will make up a large proportion of the international migration numbers and the majority will leave after 3-5 years.
- (3) The Royal Vet College is much smaller at 1884 students of which only 180 are international.

Population by age (ONS)

	2001	2011	difference
18	1232	1779	547 (44.4%)
19	1494	2472	978 (65.5%)
20	1815	2988	1173 (64.6%)
21	1721	2565	844 (49%)
22	1496	2247	751 (50%)
23	1291	1940	649 (50.3%)
	9049	13991	4942

- (4) The population by age data supports the suggestion that at least 5000 of the increase is university related growth which will remain but will not increase at the same rate. The university increased student capacity by 16%.
- (5) Accounting for this one off increase, actual resident population increased by at most 8%.
- (6) This is further supported by the overestimation noted in the Edge Analytics 2012 report page 77,78. Predictions of increases in the 15-34 age groups were exaggerated as the university has stabilised.



- (7) The detail of residence also shows the increase in student population with 1600 living in the Borough term time only. This figure is likely to be an underestimate as students reside in rented household accommodation for the majority of their time at university. Increased availability of university accommodation will inflate the figure and probably accounts for the increase of 1500 in communal residency.

	2001	2011
Lives in household	97553	106,830
Lives in communal hh	2264	3705
Student term time only	n/a	1609

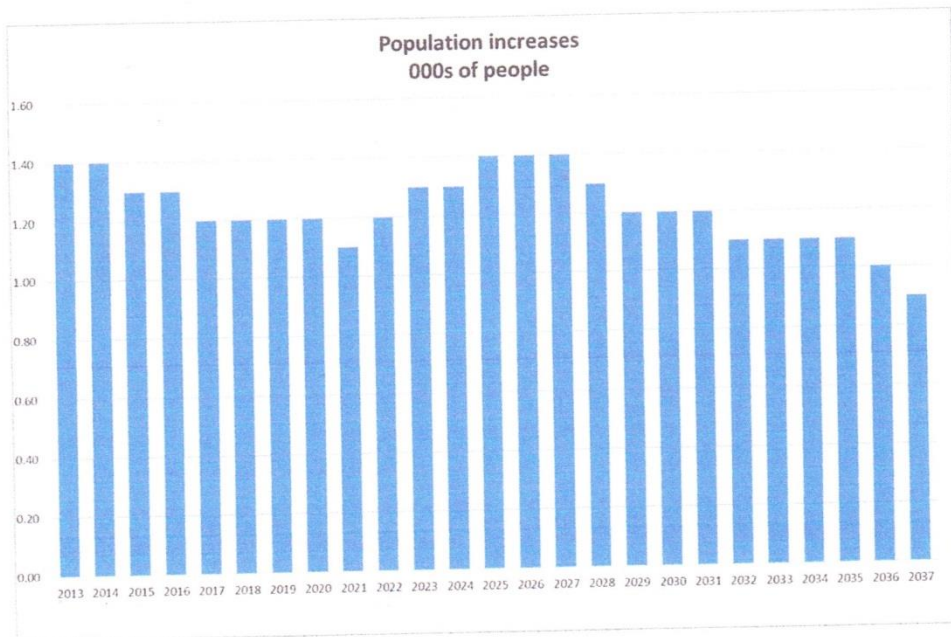
- (8) With more student accommodation being built near campus student numbers in Hatfield will increase disproportionately again.
- (9) These numbers may well be an underestimate as students may not have returned census forms.

Implications for the 2021 and 2031 predictions

- (1) The predictions are based solely on assumptions relating to births, deaths, internal migration and international migration. See chart below.

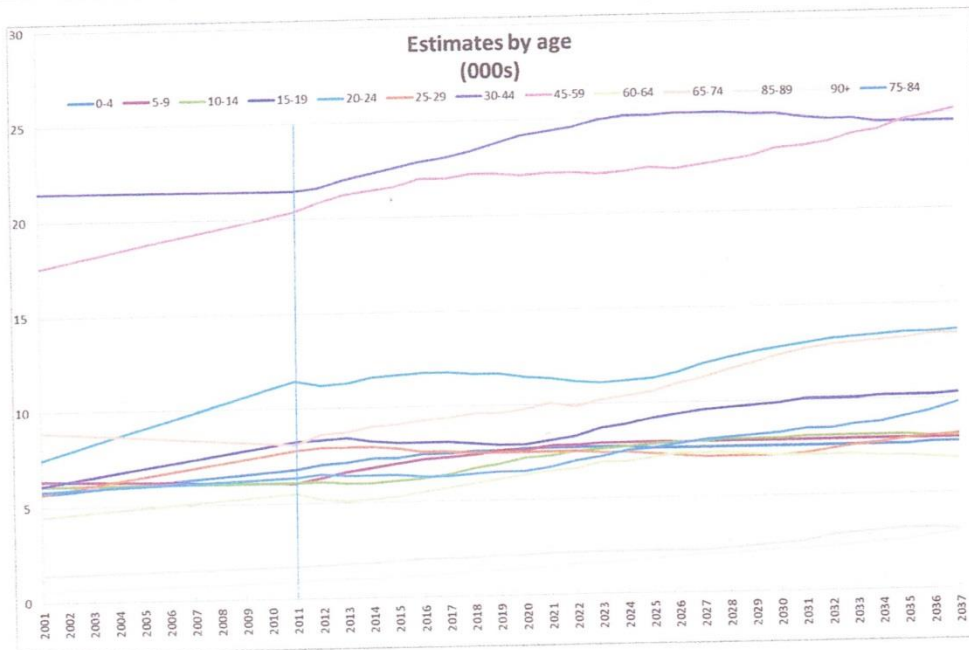


- (2) International migration increases of 900 people per year every year make up the bulk of the prediction. Natural change (Births less deaths) vary between 400 and 500 people per year. Internal migration sees up to 400 people leaving Welwyn and Hatfield each year. The result is varying increase of between 900 and 1400 people per year largely determined by internal migration.

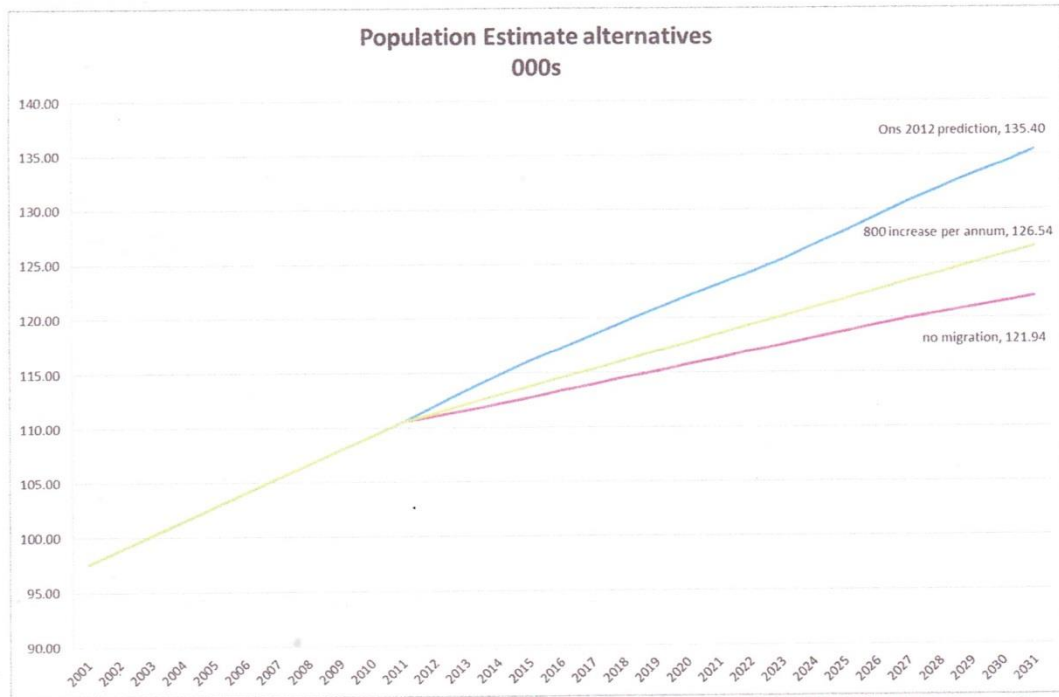


- (3) The international figure is calculated as International arrivals at around 1600 and about 700 depart each year according to ONS data collected at point of entry and via National insurance applications.
- (4) International students would account for a large proportion of this, with 5000 attending UH each year.
- (5) The majority would return to their country of origin once achieving a degree.

Revised Population estimates



It is unclear what age group the migrant increases will be in, no learning here. Only option is to examine the migration and natural change options.



No migration implies just natural change or births-deaths and represents about 500 additional residents per year. These figures can be divided by around 2 to get the number of households required.

The resulting estimates are shown below.

	1991	2001	2011	2021	2031	households
Welwyn	93800	97500	110535	123100	135400	12500
		+4.1%	+13.3%	11.4%	9.9%	
800 case				118.34	126.54	8000
				7%	7%	
Natural change only				116.54	121.94	5700
				5.4%	4.6%	

