

**WELWYN HATFIELD LOCAL PLAN EXAMINATION:
ADDITIONAL DOCUMENTS CONSULTATION: AUGUST 2019**

Representations of CPRE Hertfordshire

IMPLICATIONS OF EXTENDED PLAN PERIOD TO 2035 (DOCUMENTS EX103 and EX103B).

1. Campaign to Protect Rural England, Hertfordshire (CPREH) wishes to make representations on the above documents in respect of the significance of extending the Plan period for the soundness of the Submitted Welwyn Hatfield Local Plan.
2. These representations respond to the Programme Officer's email of 20 July 2019 inviting representors to comment on Examination Documents EX101 to EX152.
3. At the time of preparation of these representations the Council was still considering how to proceed following the submission of representations on additional potential housing sites and possible changes to Green Belt boundaries and other modifications to the submitted Plan in the light of the Inspector's comments on it, and the Inspector's further letter to the Council dated 8 August 2019. Such proposals, in the form of possible modifications to the Plan would need to consider the consequences for the Green Belt, and CPREH has previously stated a wish to participate in the Inspector's examination of any such changes at future hearings held by the Inspector.
4. The aspects of soundness that are addressed by these representations are:
 - 1) whether sufficient evidence has been submitted by the Council to justify the significant additional scale of development, including development in the Green Belt, for which provision would need to be made in the Plan, and
 - 2) the absence of formal consultation on a development plan document that includes such proposals.
5. Of particular importance in consideration of these issues is the requirement for the Council to demonstrate exceptional circumstances to justify the scale and location of any additional development allocations proposed in the Green Belt by the Council as a result of such an extension to the Plan period.
6. These aspects of soundness is also relevant to any modifications to the Plan that may be proposed by the Council as a result of its current review of the housing proposals in the

Plan as a result of the Inspector's advice to the Council following the initial stages of the Examination.

Implications of a new Plan period (EX103 and EX103B)

7. The first point we wish to make is to note that NPPF 2012 applies to the Plan, not NPPF 2018 or 2019. This means that for the purposes of determining the Plan period paragraph 157 of that NPPF applies. That paragraph states;
 'Crucially, Local Plans should: be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date' (second bullet point).
8. The emphases of the above policy are by CPREH, because they show that there is no national policy requirement for the Welwyn Hatfield Local Plan period to start at the date of Adoption or later, as suggested by the Council's Appendix B (EX103B). That only applies to future plans prepared under the latest NPPF. The relevant NPPF clearly intended a timescale that included the period when the Plan was being 'drawn up' using base data and anticipated trends at that time to enable all interested parties to have the opportunity to contribute to the planning process based on a common understanding of the information on which the Plan is being prepared.
9. It is not, in our opinion, acceptable for the Council to be, in effect, reviewing the submitted Local Plan before it has even completed the examination stage, let alone been adopted.
10. Even the 15 year time horizon from preparation is only stated by the NPPF to be 'preferable' and the Council's initial intention to adopt a plan with a 15-year post adoption timescale of 15 years, could only be justified if supported by adequate evidence of likely development requirements over the period specified in the Submitted Plan, not over an unspecified and indeed undetermined period as yet unknown.
11. Given the major uncertainties about the short to medium term economic and social contexts for plan-making and planning decisions, let alone longer term uncertainties, CPREH considers that it would be unreasonable and totally unjustified to extend the Local Plan period beyond 2032. This is because such an extension would be likely to result in the Council proposing the removal of even more land from the Green Belt

without being able to demonstrate that the exceptional circumstances for doing so are likely to exist in 15 years' time.

12. The process of Plan review and updating every five years is specifically intended to enable councils to adjust to changing circumstances, and observed and predicted trends, and this is particularly important when the wider sub-regional, regional, and national contexts are in a state of flux as they are currently. By the time of such a first review of the Local Plan, the results of the 2021 Census will be available, and the initial consequences of any changed international political relationships will have been experienced enabling greater certainty to inform the plan review process.
13. In particular actual changes to household formation rates and population, can be reviewed against the projections by ONS to determine what trends are likely be experienced in 15 years' time.
14. As CPREH has regularly pointed out, the removal of land from the Green Belt cannot be reversed, and this is why exceptional circumstances for doing so must be explicitly demonstrated. We do not consider that it is possible to do so now for development proposals intended to be implemented over 13 years into the future.
15. In this context the Council's wish to use a combination of 2014-based and 2016-based household projection data in order to justify an excessive estimate of housing need into the long term, as set out in Turley's review of household projections implications (EX103A) is not justified.
16. Accordingly we consider that such long term future provision in the Local Plan would be unsound by virtue of it being unjustified based on the evidence made available by the Council.
17. CPREH is also concerned that a three year extension of planning policies and proposals has not been the subject of formal public consultation in a development plan document, giving statutory consultees and anyone who may have an interest in such matters an opportunity to make representations as required by the relevant regulations. We consider that any such proposed plan period extension would therefore be unsound.