

Comments on WHBC Examination Documents (Consultation Documents) 2nd Consultation 18th January 2021

Dear Louise,

Please find below my detailed comments on the documents open for examination.

I would be grateful if you would also take note and pass on to the Examiner my dismay at the way the Examination is now progressing. Whatever government ministers may have said about supporting the Green Belt they seem prepared to sacrifice it for housing targets, regardless of whether the targets are sensible or realistic in today's economy. The Welwyn Hatfield Annual Monitoring Report shows the growth in the population of Welwyn Hatfield last year was 0.2%. Yet the OAN of 16,000 would be a 33% increase in the Boroughs housing total. I cannot see how this is reasonable or justified given the growth position the country is in post pandemic. I want my council to be focusing on recovery after the pandemic, not wasting time, effort and money on fighting preposterous OAN targets. To further compound my concerns, the Inspector says, "the figure that is currently before the examination is 16,000 and not whatever alternative figure the Council would prefer it to be". The decision to hold hearings into sites which had been put forward for development, but which were not approved by the Council and not included for public consultation in the Draft Local Plan Proposed Submission in August 2016 or the Consultation on Proposed Changes in February 2020 seems obdurate and perverse. The Council is submitting it's plan for examination, not asking the Examiner to write his own plan.

Yours Sincerely,

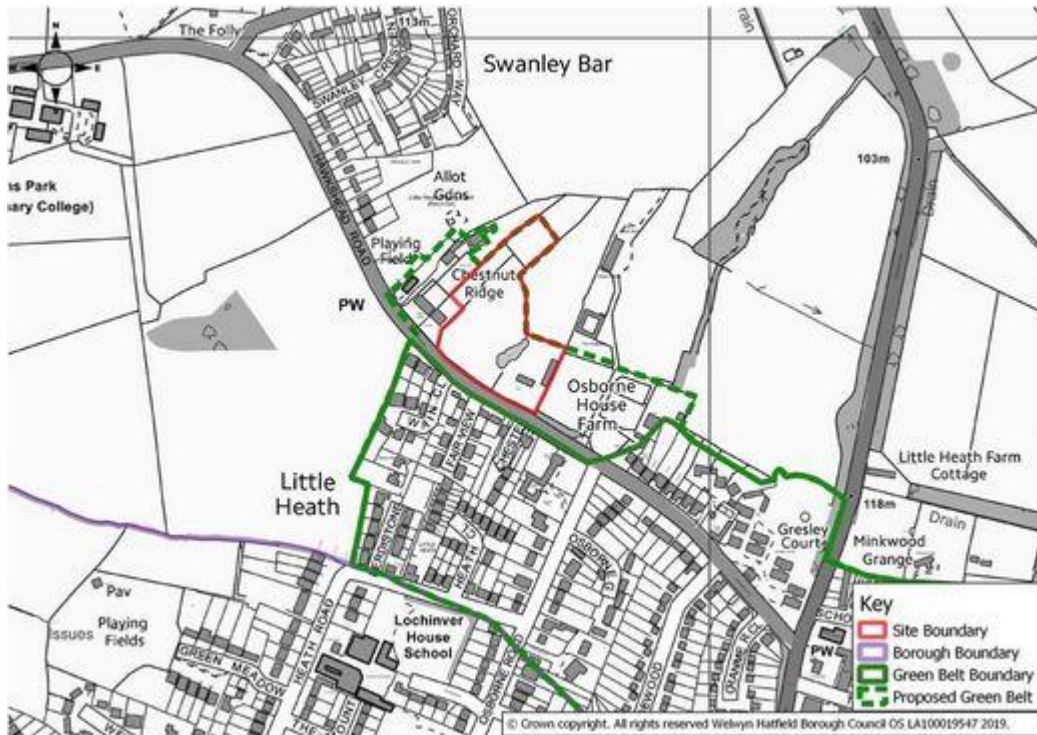
Scott Sibuns

EX223 WHBC Green Belt Boundaries

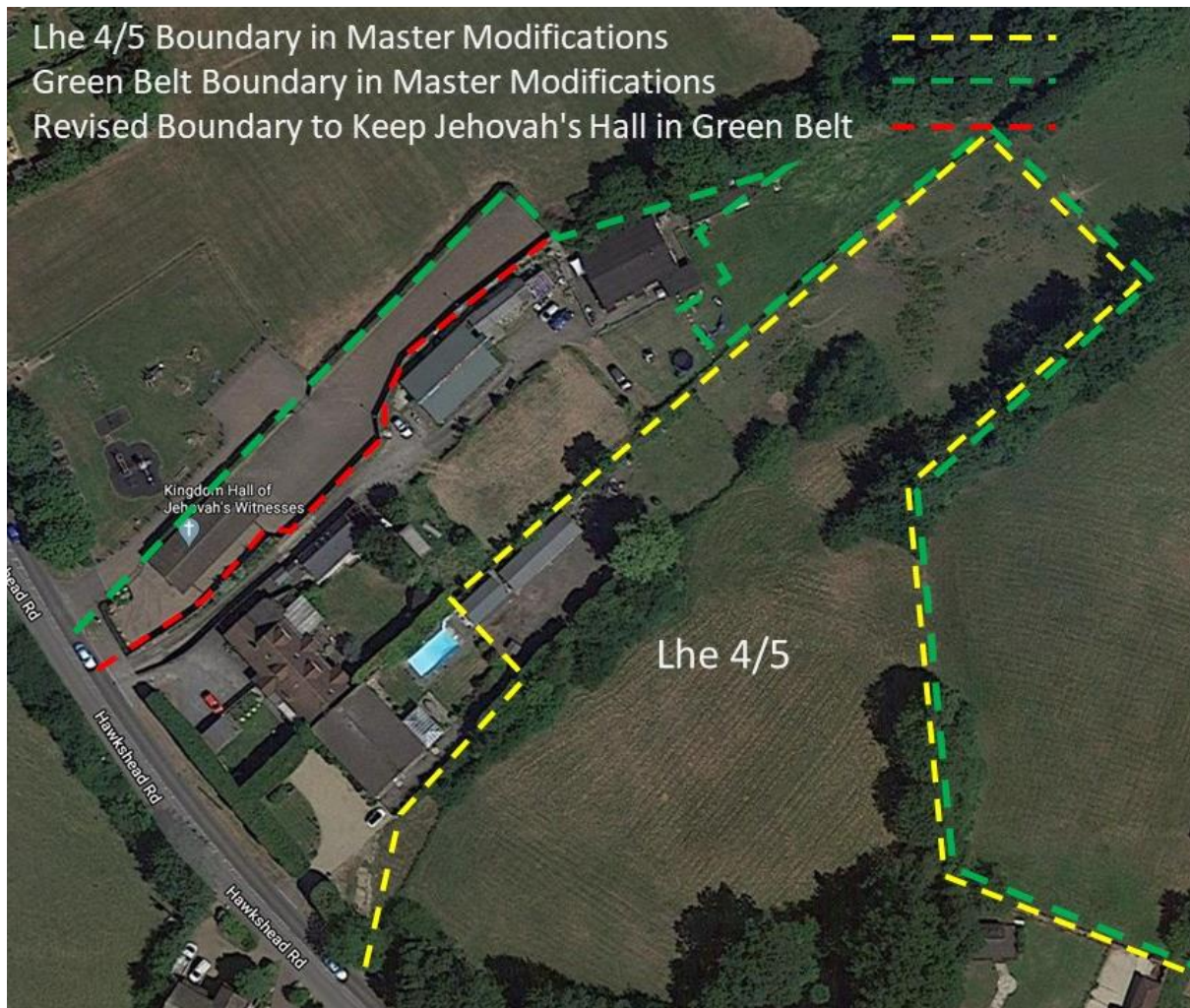
Lhe4/5 Videne & Studlands

The proposed boundary change will take in more than just LHe4/5. It will take the Tanum Farm & Chestnut Ridge properties to the North/West of the site and the Jehovah's Witness Hall out of the Green Belt. The Jehovah's Witness Hall site should not be included in the Green Belt Changes. The property is formed out of land that was part of the adjacent North Mymms Parish recreation ground and should remain as a community resource and not be susceptible to redevelopment due to being removed from the Green Belt. Throughout the Local Plan process there has never been any suggestion that the Kingdom Hall site might be developed. It has never been included in any site submitted for consideration throughout the planning process and has no impact on the housing numbers delivered in the plan. Still, it might now be taken out of Green Belt rendering it available for development and potentially further closing the gap to Swanley Bar.

The consultation document included the following plan showing the proposed Green Belt boundary revision being between the recreation ground car park access road and the Jehovah's Witness Hall.



As LHe4/5 has been included in the Major modification to the plan and the Green Belt Boundary will be revised the new boundary should be re-drawn between the Jehovah's Witness Hall and Tanum Farm - the last residential property to the South East. The diagram below shows this. With the boundary thus moved any landscaping etc to delineate the new boundary should be within the released land, ownership limitations permitting.

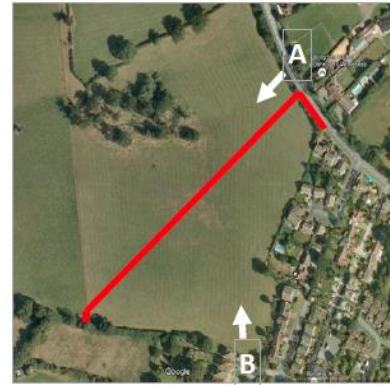


HS24 (Brp7)

HS24(Brp7) has been recommended for removal from draft local plan by the Council. I fully support this decision and commend the Council for removing this site because the exceptional circumstances no longer exist for the release of this site, or any sites resulting in high harm to the Green Belt

However, as it is still being included in the consultation for completeness the following should be noted. The proposed change to the Green Belt boundary for HS24 would create a boundary that is wholly indefensible against further development expansion. Indeed, the proposed new HS24 boundary is probably the weakest Green Belt Boundary change in the whole of the local plan. In fact, the extreme weakness of the proposed boundary is only confirmed by the proposed expansion of the site to include LHe3 which simply moves an invisible boundary across an open field. The proposed northern boundary HS24 is over the middle of an open field used for sheep grazing, not following any existing hedge, fence, or natural boundary. Indeed, this indefensibility has been amply demonstrated throughout the consultation process as the boundaries of HS24(BrP7) have changed significantly twice during consultation phases, at no time following any land features, nor being as anywhere near as strong as the existing road and building boundaries. The pictures below show the nature of the proposed boundary over open fields.

Therefore, any green belt boundary on the north west of HS24 would need to be the strongest of any in the final local plan, sufficient to stop any future attempts to “creep” the boundary further northwards. A simple line of trees that could easily be removed would not be sufficient.



EX231 HS22 / BrP4 Statement of Common Ground between WHBC, Royal Veterinary College and Hill Residential.

HS22/BrP4 has been recommended for removal from draft local plan by the Council I fully support this decision and commend the Council for removing this site because of its High Harm to the green Belt.. The council's position on HS22 is sound and the sites should remain out of the Local Pan and remain in the Green Belt because the exceptional circumstances no longer exist for the release of this site, or any sites resulting in high harm to the Green Belt.

RVC's suggestion of linking the sale of land for housing to reinvestment in the College is deplorable and the Council has rightly asserted that this is not a consideration that should inform the selection on which are the most sustainable local plan sites (WHC Cabinet 19 Nov 2020)

EX232 HS24 / BrP7 Statement of Common Ground between WHBC and Royal Veterinary College.

HS24(Brp7) has been recommended for removal from draft local plan by the Council. I fully support this decision and commend the Council for removing this site because of its High Harm to the green Belt. The RVC's position in the statement of common ground attempts to expand HS24 to include the site LHe3 which was specifically not selected for inclusion when sites were called for. The council's position on HS24/Lhe3 is sound and the sites should remain out of the Local Pan and remain in the Green Belt because the exceptional circumstances no longer exist for the release of this site, or any sites resulting in high harm to the Green Belt

RVC's suggestion of linking the sale of land for housing to reinvestment in the College is deplorable and the Council has rightly asserted that this is not a consideration that should inform the selection on which are the most sustainable local plan sites (WHC Cabinet 19 Nov 2020)

EX237 Stage 9 Matter 14 Site LHe4/5 Videne and Studlands Hawkshead Road - Consideration 76

The proposed boundary change will take in more than just LHe4/5. It will take the Tanum Farm & Chestnut Ridge properties to the North/West of the site and the Jehovah's Witness Hall out of the Green Belt. The Jehovah's Witness Hall site should not be included in the Green Belt Changes. The

property is formed out of land that was part of the adjacent North Mymms Parish recreation ground and should remain as a community resource and not be susceptible to redevelopment due to being removed from the Green Belt. Throughout the Local Plan process there has never been any suggestion that the Kingdom Hall site might be developed. It has never been included in any site submitted for consideration throughout the planning process, yet it now might be taken out of Green Belt rendering it available for development and potentially closing the gap to Swanley Bar. The Green Belt Boundary should be revised. The new boundary should be re-drawn between the Jehovah's Witness Hall and Tanum Farm the first residential property to the South East. See the diagrams above referenced for EX 223

Scott Sibuns 4th Feb 2021