



Louise St John Howe
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Our ref: Howe 09 10 2017

Date: October 9, 2017

Dear Louise,

Welwyn Hatfield Local Plan - Hearing Sessions Stage 2

This letter is submitted on behalf of Hamish Tabor, who welcomes the opportunity to provide Statement as part of the Examination Hearing Sessions Stage 2 for the emerging Welwyn Hatfield Draft Local Plan 2013-2032.

As part of the emerging Welwyn Hatfield Draft Local Plan (WHDLP), we have provided previous Representation to the Inspectorate (*Wel14, Linces Farm, Welwyn: Representation – October 2016 and September 2017*). These submissions have previously outlined our overall concerns regarding the soundness of the emerging plan

In specific regard to the upcoming Hearing Session 2 'Overarching Strategy', we would like to draw particular attention to Agenda Item 6. Specifically the sub point, "Is the strategy now being advanced really one that seeks to maintain the existing pattern of settlements?" It is our view that Council is not justified in its approach to allocating development within Welwyn and surrounding area and is in fact contradicting its own Settlement Strategy (Policy SP3) by prioritising Small Excluded Villages over Welwyn as a Large Excluded Village. The disproportionate level of growth being directed to northern Small Excluded Villages is not justified or evidenced when considering the sustainable characteristics and infrastructure available at Welwyn. This leads us to believe that the Council is promoting a pattern of growth in the north of its Borough which contradicts its stated intentions and will narrow the gap between Small and Large Excluded Villages.

Turnberry Planning

Policy SP3 'Settlement Strategy and Green Belt Boundaries' of the emerging WHDLP, clearly details the need to maintain sustainable settlement patterns of growth and to focus the allocation of new development in accordance with the outlined settlement hierarchy. The settlement hierarchy classifies that allocations and new growth should be focused primarily in the two towns (Welwyn Garden City and Hatfield), then secondarily to the 'large excluded villages' and successively after that to the 'small excluded villages' and beyond. Welwyn is classified as a 'large excluded village' within the WHDLP.

Our analysis shows the current proposed site allocations for Welwyn fall short of the proportionate distribution of its OAN, which suggests that Welwyn would need to accommodate between 424 and 451 additional dwellings (*Table 1 - Housing Sites Selection Background Paper June 2016*). At present, there are only three sites allocated for development in Welwyn: HS18 (Wel11), HS19 (Wel4) and HS20 (Wel3) making up a total of 67 dwellings. As shown in the table below, the WHDLP has alternatively allocated a disproportionate amount of development in other smaller northern villages (i.e. Oaklands and Mordley Heath, and Woolmer Green), which are subordinate in the outlined settlement hierarchy as they are classified as 'small excluded villages'.

Settlement	A) No. of Sites that passed the Stage 2 Site Assessment	B) Sites Considered Suitable for Allocation within 2016 Housing Site Selection Background Paper	%
Welwyn	299	67	27
Oaklands and Mardley Heath	39	31	12.5
Woolmer Green	190	150	60.5
Total	528	248	100

The decision to not allocate a proportionate balance of development at Welwyn, and alternatively focus growth in subordinately ranked 'excluded small villages', is therefore inconsistent and

contrary to the Policy SP3 regarding settlement hierarchy and promoting sustainable patterns of growth.

According to the '*Housing Sites Selection Background Paper*' (2016), The rationale for not allocating a proportionate amount of growth at Welwyn is that there is a degree of uncertainty as amount of primary education capacity at Welwyn. This is an erroneous claim, as it states that due to St Mary's VA C of E Primary School being a listed building, it is not suitable for expansion. In fact, this Primary School is not a listed building and County Council concluded that there was in fact capacity for expansion of primary school capacity at Welwyn.

When considering the requirement to allocate growth based on the outlined settlement hierarchy in conjunction with the available educational capacity and rail connections, it is clear that the proposed proportionality for allocation at Welwyn has been underestimated. Focusing growth to the lower end of a hierarchal structure despite there been more sustainable alternatives at Welwyn with infrastructure capacity and sustainable transport links, reinforces the fact that the currently proposed WHDLP is promoting non-sustainable patterns of growth contrary to the NPPF as well as its own objectives defined under Policy SP3.

In order to make the Plan sound, we recommend that the sustainable characteristics of Welwyn should be reappraised and additional growth arising from a revaluation of OAN, and existing growth currently identified within the smaller villages, should be redirected to Welwyn.

Yours faithfully

A solid black rectangular box used to redact the signature of Chris Pattison.

Chris Pattison