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By email to louise@poservices.co.uk

My Ref DLA/14/255

Dear Louise,

**RE: WELWYN HATFIELD LOCAL PLAN
LAND AT POOLEYS LANE, WELHAM GREEN (WeG12)**

I write in response to the Inspector's published agenda for the Stage Two hearing sessions (doc. EX22).

We act for the trustees of land at Pooleys Lane in Welham Green (WeG12), one of the unallocated "green sites" i.e. a site that passed Stage 2 of the SHLAA but was not allocated in the submitted Local Plan. In summary, our position is that the Council is not meeting the area's objectively assessed housing need yet has chosen not to allocate sites that were found suitable in the SHLAA. In the case of Welham Green, a significant shortage of new allocations was justified on the basis of a lack of primary school, and more recently secondary, school places. However, a suitable site for a new primary school exists in Welham Green and representatives of sites around the village have come together to agree a Memorandum of Understanding stating that a new primary school can be delivered and funded by new development on these sites. The Memorandum of Understanding is attached to this statement.

We will pursue the settlement- and site-specific issues at the appropriate stage in the Examination timetable, as invited by the Inspector. We do not intend to appear at stage 2 in respect of this site.

At this stage, and specifically in response to the Inspector's agenda, we have the following brief comments to make:

1. Housing market areas – no comment
2. Full Objectively Assessed Housing Need – our previous representations highlighted concern that the Council was not meeting its earlier-identified OAN. Now that the OAN identified in the SHMA has increased, and looks set to go even higher under the Government's new methodology, this issue becomes even more important.
3. No comment

4. Green Belt Review – our only comment here is a note of caution on the usefulness of Green Belt reviews. In our experience, most sites on the edge of urban areas play some Green Belt function but that does not mean they should not be considered for release from the Green Belt. Conversely, those Green Belt sites remote from towns or villages often play a lesser Green Belt role but are unsuitable for development because of their isolation. It is important to weigh the findings of a Green Belt review with the site assessment findings and the housing need evidence and come to a balanced judgement.
5. Green Belt Exceptional Circumstances – in our view the scale of housing need clearly constitutes housing need, as do the sustainability implications of not releasing Green Belt in the Borough and forcing development further north, out of the borough and beyond the Green Belt.
6. Spatial vision – no comment
7. Targets for growth – as set out earlier and above, the housing target is not sound and needs to be increased to meet identified need.

Specifically, the constraints to growth around Welham Green imposed by a lack of primary school places is not justified. The existing school site is constrained and accommodating an additional form of entry appears difficult. However, the Council has not adequately examined other options, particularly the scope to provide a new school as part of development. A Memorandum of Understanding (attached) states that a new primary school can be delivered and funded by new development on the sites around Welham Green. This has been produced in discussion with the County Council. There is now no reason to limit growth around Welham Green as proposed in the submitted Local Plan.

8. Five-year housing land supply – the proposed approach to the housing trajectory is not consistent with the need to boost housing delivery in the short-term, as identified in the NPPF. The lack of supply coming through the system must be addressed as soon as possible, rather than deferring the delivery of sites.
9. Overall development strategy – a strategy that does not meet OAN but leaves unallocated sites that were found suitable through the SHLAA process cannot be sound. Additional homes should be provided in Welham Green.

Conclusions

The draft Local Plan is unsound in respect of its overall housing provision. It fails the “positively prepared” and “consistent with national policy” soundness tests in failing to meet identified housing need. The Local Plan can be made sound through the allocation of additional housing sites. Specifically, the site at Pooleys Lane in Welham Green (WeG12) should be allocated, alongside sites WeG1, WeG3, WeG6, WeG10, WeG15 for housing and a new primary school.

I hope this is helpful. I look forward to participating in later hearing sessions.

Yours sincerely



Simon Andrews
Strategic Planning Manager