

**Welwyn Hatfield
Local Plan
Examination**

**Hearing Statement
Matter 4 – Topic
Specific Policies**

Issue SADM 10

**Clare Hutchinson
On Behalf Of
Mr and Mrs Tubb Wallace**



1.0 INTRODUCTION

- 1.1 This hearing statement is submitted on behalf of Mr and Mrs Tubb Wallace, Landowners of site HS15 in Woolmer Green, allocated under policy SADM29 for 150 dwellings.
- 1.2 Representations were made on behalf of Mr and Mrs Tubb Wallace at the regulation 19 consultation stage to policy SADM29 on a wide range of issues, including in regard to the inappropriateness of permitting residential development at Entech House, which forms part of EA10 and is promoted for residential development by Taylor Wimpey.
- 1.3 Given the tone and extent of representations made to SADM10 at the regulation 19 stage seeking the removal of Entech House from EA10 and its allocation for housing development instead of HS15, and as a consequence the Inspector's issues raised under SADM10, we are submitting this hearing statement in response to question 52 of the Inspector's stage 3 Matters and Issues as it directly relates to issues we raised at the regulation 19 stage.
- 1.4 **I confirm we are not seeking attendance at the hearing session.**

2.0 QUESTION 52: IS IT APPROPRIATE TO RESTRICT THE USE OF SITES EA9 AND EA10 AND THE UNDEVELOPED PARTS OF EA6 TO CLASS B USES ONLY?

- 2.1 The preceding questions 50 – 51 concern the wider principles of the amount of employment land proposed to be allocated in the district and the protection that should be afforded to this land. These in principle issues are not a matter on which we raise comment. However, if the Inspector concludes that the amount of employment land allocated is sound and that this land should indeed be protected, then we consider that Entech House should be retained as employment land as part of EA10.
- 2.2 Taylor Wimpey argue that, in the context of paragraph 22 of the Framework, there is no reasonable prospect of the site being used for employment purposes. In this context we would like to bring to the Inspector's attention the application for the residential re-development at Entech House that were recently refused planning consent in September 2017 (application reference: 6/2017/0848/MAJ). The refusal reasons set out



that the marketing undertaken failed to demonstrate that there is no reasonable prospect of the site being used for employment. In particular, Officers raised the following concerns:

- Insufficient period of marketing
- Insufficient publicity of freehold purchase price or leasehold quoting rent
- Insufficient justification for leasehold/freehold price sought
- Insufficient information regarding handling of inquiries
- No consideration of opportunities to invest and refurbish the property including pursuing a multi-let strategy
- No consideration of the potential to demolish and redevelop the site for commercial purposes

2.3 A revised planning application for the residential redevelopment of Entech House was submitted by Taylor Wimpey in November 2017 (6/2017/2695/MAJ). This application for 72 dwellings has yet to be determined. This is accompanied by an updated Market Assessment Report which purports to address the points raised in the previous refusal. Having reviewed this Report we would make the following comments:-

- At the time of writing a viability appraisal has not been provided, although the Planning Statement indicates this is to follow. This must comprise a full viability analysis of a range of redevelopment options for commercial purposes which include wholesale redevelopment, refurbishment and intensification (i.e. new development alongside the refurbishment of some or all of the existing buildings). The analysis must consider this full range of redevelopment/refurbishment options against an appropriate benchmark/threshold value which reflects paragraph 173 of the Framework, namely that the project should, "...provide competitive returns to a willing landowner and willing developer..."
- The property remains marketed without publicity as to freehold guide price. A guide price should be provided and this should match the benchmark/threshold value in the viability analysis.



- The property remains marketed without publicity as to leasehold guide price. A guide price should be provided on marketing information and reflect the inputs into the viability analysis.
- The property should be offered on a multi-let leasehold basis.
- The advertising board on the site remains 'All Inquiries'. The board should state 'To Let/For Sale'. The latter is standard practice when marketing property for sale and rent.

2.4 Overall, we do not consider that adequate evidence has been provided that there is no reasonable prospect of the land being used for employment purposes. In particular, the evidence provided to date does not establish that the rent/asking prices is not excessive with regard to an appropriate benchmark/threshold value.

2.5 We would also like to highlight that many of the respondents objecting to the allocation of Entech House as part of employment site EA10 at regulation 19 stage have done so based on an understanding from a local opposition group opposed to HS15 that the redevelopment of the Entech site for housing would directly prevent site HS15 from needing to be developed. The opposition group's website makes clear statements to this effect.

2.6 However, since HS15 has been found suitable for development, and given the context of the Inspector's Note EX39 of December 2017 wherein it is clear that in an effort to meet FOAN no stone must remain unturned in terms of finding sites that are suitable for release from the Green Belt, it would not be a sound approach to delete HS15 as a housing allocation.

2.7 If Entech were to be released for housing, the only sound approach would be to deliver both sites. Our representations made at the regulation 19 stage in response to policy SADM29 (Woolmer Green) set out in detail why Woolmer Green is a sustainable location for growth, and is clearly capable of accommodating a scale of growth in excess of that proposed at HS15. Site HS15 is demonstrably deliverable as evidenced by the technical work provided (see our original representations) and given the requirement for Local Plans to be positively prepared (paragraph 182 NPPF) and meet objectively assessed



needs, any modification that removes a deliverable site from the Plan would be unsound.