

From: littleheathactiongroup
Subject: reply to the Inspector regarding the Local Plan
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To: louise@poservices.co.uk

LITTLE HEATH ACTION GROUP EXTRA COMMENTS ON FAILURE OF DUTY TO COOPERATE

A number of objections were clearly laid out in our original submission during the consultation period. We understand from Louise St John Howe that these will all be taken into account. There has been extra information/documents published since our comments were submitted as part of the consultation and we wish to register the issues below

After receiving two rounds of Freedom of Information documents from Welwyn Hatfield Council, we had established from these documents that meetings had been held with various Councils. However, very little of if any agreements were stated anywhere in the minutes of these meetings or subsequent documents.

As you recognise, from the comments in our submission, Little Heath residents on the Hertsmere side were not made aware of the Welwyn Hatfield Council's Local Plan. It was again clear that no agreement had been made on the substantial infrastructure requirements, required for the Hertsmere section. Oliver Dowden, MP for Hertsmere, had written to Welwyn Hatfield Council with his objections on this very important subject. Subsequent to the above, the Welwyn Hatfield Council recently published a large document to you, showing signatories agreeing to a Duty to Cooperate between Welwyn Hatfield and Hertsmere Councils. Importantly this is dated **25th May 2017**. This appears to confirm that previous meetings were not in line with the requirements of the duty to cooperate.

Using Education as a specific example. WHBC's own MOU with Hertsmere **only** states that both authorities will continue to work together. It seems WHBC is intending to carry out an "early review of the Local Plan" to address this. We identified in our earlier submission that not enough school places would be available for residents children especially primary

places. Duty to cooperate with Hertfordshire County Council is as ambiguous; HCC has numerous formulae for calculating school places requirements which seem to be ever decreasing the school places required and would lead to the shortage we identified.

The document dated 25 May appears to us to be a last ditch attempt by the Council to identify that meaningful discussion had finally taken place. **Significantly, however, this is still just a statement of intent with very few meaningful outcomes or agreements**

Further, we question whether it was lawful to submit the Local Plan without many material outcomes or conclusions being in place. This question was in fact raised at the WHBC Cabinet Housing and Planning Panel meeting (16 March 2017) which approved submission of the Local Plan to the WHBC Cabinet for final submission. For example the traffic policy was actually **minuted** as being unsound! However, whilst there was some discussion on the matter, ultimately the point was ignored!

We have now been made aware of a very late paper from Hertfordshire County Council which suggests that around £50,000 per household will be needed to provide correct infrastructure. Why was this not available for the original consultation, as this should have been part of any Duty to Cooperate? We have not seen any figures from the Council to confirm that this figure will be available to address the significant infrastructure issues. The Cabinet Housing and Planning panel discussed this prior to approving the plan. Members expressed concern that comparative information from neighbouring boroughs which appeared to be charging higher rates had not been provided. It seemed more important that CIL rates were competitive with neighbouring boroughs, not to meet the real expected costs?

.We made clear reference to the Green Belt boundaries in our submission. The proposed boundaries for both developments(HS24 and 25) are significantly weaker than the current hard boundaries. Some of the new boundaries are reliant on hedges and fences.

Regards

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