

# MADDOX

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Louise St John Howe  
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19 December 2017

Dear Ms St John Howe

[Welwyn Hatfield Local Plan Examination](#)  
[Examination document EX33](#)

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I note that Aurora Properties has prepared a table of suitable and available sites dated 26 October 2017 and that this is now an examination document (EX33).

Please can you advise the Inspector that document EX33 is factually incorrect where it states that the Housing and Economic Land Availability Assessment dated June 2016 ('the HELAA') concluded that HAT2 was not achievable. This is not the case as the HELAA concluded that the achievability of HAT2 was uncertain but it did not conclude that it was unachievable. Indeed, the HELAA concluded that HAT2 passed the stage 2 assessment for delivery in years 6-15. The HELAA also gave HAT2 a development potential of 1,375 dwellings at a very low 20 dwellings per hectare, whereas document EX33 refers to 1,350 homes. Our representations have sought an allocation for a minimum of 1,100 new homes.

Since the publication of the HELAA, the promoter (being the single landowner) of HAT2 has demonstrated that HAT2 is indeed achievable. The local planning authority accepted the suitability, availability and achievability of HAT2 in the Housing Sites Selection Paper dated June 2016 in concluding that it should be considered suitable for allocation, albeit at a later date.

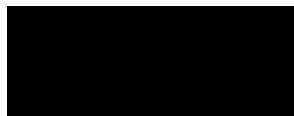
Consequently, if examination document EX33 is to be relied upon then the entry of 'no (not achievable)' must be replaced with a 'yes' meaning that as many as 3,200 new homes could be developed on suitable, available and achievable sites in the HELAA and found to be reasonable alternatives in the Sustainability Appraisal. Tellingly, 3,200 homes is the exact shortfall between the Council's Local Plan provision and its FOAHN meaning that the authority can meet its objectively assessed development and infrastructure needs of the area and make its fair contribution to the country's well documented housing crisis.

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Of course, the real FOAHN is likely to be higher than the Borough's estimates as the Government's initial calculations based on its proposed standardised methodology show that it is meaning that it is even more important to allocate HAT2 for housing in the Local Plan.

Yours sincerely



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Managing Director

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