

Mr M Middleton
Planning Inspector
C/O Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts
AL8 6AE

21st August 2019

Dear Mr Middleton,

Let me start by saying how disappointed I am that the Local Plan submitted by Welwyn Hatfield Borough Council has proved to be so unsound that it requires wholesale modification in an attempt to make sound. This is clearly not acceptable.

A significant number of documents have recently been added to the Council's Examination Website, many of which are fundamental to the soundness of the Plan and which raise serious questions about the Council's preparation of the plan.

My representations in this letter will focus on the plan period and the objectively assessed need.

Firstly, the existing adopted Local Plan expired in 2011. Since that time, the Council's delivery of new homes has been severely constrained by its unwillingness to recognise the need for new housing and the increasing affordability ratio in the borough.

The delivery of new homes in 2011 to 2016 is approximately 2500 below its FOAHN. The plan presently commences in 2013, which excludes two years of the above deficit.

The Council now seeks to persuade you that it can move the start date for the plan to 2016 and that the FOAHN of 800 dpa will remain unchanged. That cannot be credible. The Council is trying to move the commencement date for the plan from 2013 to 2016 for one reason only, to minimise new housing delivery. That is not positive, not justified and not in accordance with government policy.

In order to have a 15- year horizon after adoption, the submitted plan should be extended to cover the period between 2020 to 2035. This would require a Housing Target of 17,600 new homes, plus additional sites to provide flexibility (as required in a Green Belt authority

to ensure housing land supply) and safeguarded land beyond the plan period. Anything less would not be compliant with the NPPF and the plan would not be sound.

The Council should take the following steps to make its plan sound:

1. The plan period should be 2013 to 2035
2. The OAN should be at least 800 dpa (the OAN should be the minimum, not the maximum).
3. The Housing Target should be at least 17,600 new homes plus an allowance for flexibility plus land.
4. The Council should have a five-year housing land supply.
5. The under-delivery in housing during the period 2013 to 2016 should be recovered during the first five years of the plan period.
6. Housing distribution should be throughout the borough, based on suitability and sustainability, including the four large villages, three of which have railway stations.

The Council's submission of a plan that was obviously not sound, followed by repeated delays to the examination, followed by material changes to the plan and the preparation of new evidence is not compliant with the NPPF and is not a sound basis for this examination to proceed.

Yours sincerely

Neil Bedford

CC: Ms Louise St John Howe - Programme Officer