

## **Response to the Inspector's request for consultation on EX216 and EX215 by Cllr Paul Zukowskyj**

Dear Sir,

1. The situation with the WHBC Local Plan is complex and involves a significant number of moving parts. In cutting through this complexity, for me two fundamental aspects need to be central, these being:
  - 1.1. When the evidence base changes, the conclusion should also change
  - 1.2. The Local Plan is, at heart, a vehicle for LOCAL residents to agree on a shared vision for their communities in the near future
2. There is little doubt that the evidence upon which the submitted OAN was based has changed. The revision downwards of the OAN suggested by the 2016 data was overridden by Government guidelines (on the basis it was a 'blip'). A further, very significant, movement in the 2018 data is now, similarly, being largely ignored. We are now in a situation where government guidelines are using data from seven years ago despite more recent data being available, it would seem because the 2014 data provides a conclusion that the government prefers (they seem to believe there are multiple 'blips' rather than accepting the fundamental process has begun to radically change as the data would suggest).
3. The approach utilised by Turley's, which concludes the ONS main projection is unreliable on the basis that the trend is too short, is a vehicle for simply ignoring an answer that is inconvenient. Inconvenience does not make data untrue. Ignoring such "inconvenient" data is demonstrably unwise, but all too common throughout history.
4. If the main projection is used, as it has been in all previous iterations of OAN calculations, the conclusion is that less than 10,000 homes are now needed in the plan period. This is clearly and obviously what an objective treatment of the data, using the method previously utilised by Turleys and agreed by the council and accepted by yourself, results in.
5. The Council's proposal, in EX215, to adopt an OAN of 13,800 for the period 2016-2036 therefore over-reaches the need as previously calculated, updated with the latest data, by some considerable margin. The impact of too high an OAN is significant and should not be downplayed.
6. An entirely predictable result of too high an OAN will be an over-provision of development sites compared to the actual need. The logical outcome of that is that developers will 'cherry pick' the sites with the most profit, leaving those that are challenging, constrained or otherwise difficult, to lie idle. In practical terms, this means development will likely happen on greenfield sites and most, if not all, of the smaller, especially brownfield, sites will remain undeveloped.
7. The result of little to no driver to develop brownfield sites is that current brownfield sites may well remain undeveloped throughout the entire plan period and windfall brownfield sites will join them. The outcome of that process is urban decay and decline and a serious detriment to our towns and larger settlements when they are already under significant pressure from wider economics and especially COVID-19 closures.
8. A further result of too high an OAN, combined with public pressure to constrain loss of green belt, is the current trend for cramming more and more flats onto larger urban sites. The developments along Broadwater Road illustrate this very clearly, where to resist further harm to the green belt but also hit a high OAN, planners agree to even higher tower blocks and denser developments, repeating mistakes last seen in the 1960's in terms of failing to

- deliver places people actually want to live. The suggestion 11-storey blocks of flats somehow align with the 'Garden City' ethos of Welwyn Garden City is, bluntly, a nonsense.
9. In your letter EX216, you remind the council the OAN at hand is 16,000. There is no question in my mind that such an incredibly high number, based on data now seven years out of date, will result in the adverse impacts noted in 7 and 8 above and for that reason I could not support a local plan proposing such a number.
  10. In my view, the number of 13,800 suggested by the council is also too high, which is why I voted against it at the CPPP meeting on 17<sup>th</sup> November 2020.
  11. The Local Plan process is, as you know, a council-led process, and any agreed Local Plan will need to be formally adopted by the council, through a vote of all councillors present at the relevant meeting. I am, as you know, one such councillor.
  12. The concept that the Local Plan is agreed as a future vision for our community across our communities is at the core of the plan. Elected representatives in the form of councillors are one of, perhaps the most important, vehicle for our communities to have a voice in this process.
  13. While it is clear the Local Plan process is also a vehicle for implementation of national government policy, since the process is delivered at council level, if the community do not agree to components of the proposed plan, it would not be appropriate for councillors to support the proposed plan. There is therefore a tension between government policy and local communities in areas where development may potentially harm the existing communities (as outlined in 7 and 8 above) as well as through loss of amenities such as access to open, green spaces.
  14. Our community needs to 'own' its local plan and accept what it contains. At the minute there is quite compelling evidence to suggest the local community is significantly opposed to the proposed plan as they believe the housing number proposed to be much too high, especially if the number is the one presented in your letter of 16,000.
  15. Councillors therefore have a fine line to tread if they are to support a proposed plan, between damage to their communities from unplanned development and damage to their communities through badly planned development imposed from above.
  16. Councillors came to the conclusion, balancing the various factors, that the majority could support 13,800 as the OAN. This was after much debate and discussion, informed and supported by council officers.
  17. Should you decide that the democratically agreed OAN is too low, I believe your only realistic choice is to find the plan unsound. My community will not thank you for that.
  18. Should you decide that application of the previous Turleys methodology in full (including use of the primary projection) to the 2018 data yields the correct OAN, you will have my support.
  19. In summary, recent evidence produced by the national statistical authority suggests the OAN needs to be very much lower. The justification for not accepting this evidence is weak. The community view a high OAN as damaging. Councillors may not be able to support a high number and our democratic process has arrived at a lower number. To be a truly LOCAL plan, the OAN should be, at most, the number arrived at by CPPP and now proposed by the council.

Yours Sincerely,

Paul Zukowskyj

Cllr for Welham Green and Hatfield South Ward