

## **WELWYN HATFIELD LOCAL PLAN EXAMINATION**

### **Response to EX224 (Updated Housing Trajectory and Housing Supply Statement; Dec 2020)**

#### **Tarmac Trading Ltd.**

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1. In its July 2020 housing trajectory (EX193), the Council assumed a commencement of housing completions at BGS during the year 2023-4. In its recently updated trajectory (EX224), the Council assumes such a commencement in the following year (2024-5). That year-long deferment is neither explained nor justified. Indeed, prior to its submission of EX224, we suggested to the Council that it should retain its EX193 trajectory for BGS, which remains appropriately conservative.
2. The Council continues to assume a commencement of housing completions at the North West Hatfield allocation in 2023-4. There is no justification for assuming that completions at BGS will commence any later than at North West Hatfield, given their shared location within the Green Belt and strategic scale. Indeed, the North West Hatfield site is affected by delivery uncertainties arising from the proposed prior mineral extraction and possible complications from the Bromate Plume underlying the wider area. The Council expressed concern about the implications for the timing of housing delivery on the site in responding to the County Council's consultation on the planning application for prior mineral extraction at the site (County Council application reference 5/0963-18). We consider the Inspector should explore that concern, as well as the possible complications from the Bromate Plume, before accepting a 2023-4 commencement of housing completions at North West Hatfield.
3. There appears to be an error in Table 1 within EX224. The annual housing target in that table should be 690 (not 668). Continuing to assume a 2023-4 commencement of housing completions at BGS would add 75 dwellings to the assumed 5-year housing supply, which importantly would enable a 5-year supply to be demonstrated in the scenario of a 690-dwelling annual housing requirement.