

WELWYN HATFIELD LOCAL PLAN EXAMINATION

Response to EX226 (North West Hatfield; Dec 2020)

Tarmac Trading Ltd.

1. Although we have no objection in principle to the North West Hatfield allocation, it should not be prioritised over the southern part of the BGS allocation, for three reasons.
2. Firstly, 22% of the development area within the North West Hatfield allocation has been assessed in the Green Belt Study Stage 3 (EX99A-E) as giving rise to High harm to the Green Belt (para. 7 of EX226). By contrast, the whole of the BGS allocation has been assessed as giving rise to a lower level of harm – Moderate to High – to the Green Belt.
3. Secondly, Hatfield is below Welwyn Garden City in the Plan's settlement hierarchy (para. 8 of EX226). Welwyn Garden City offers a greater range of employment opportunities and other facilities than Hatfield. Consequently, development at BGS would be no less – and potentially more – sustainable than development at North West Hatfield.
4. Thirdly, the North West Hatfield allocation would deliver 20% less affordable housing than BGS (25% relative to 30% of total housing provision respectively) and would not contribute at all to the Council's CIL (whereas BGS has been assessed as a viable CIL contributor). As such, the North West Hatfield allocation is a less effective release of Green Belt than BGS in terms of its contribution to housing need and to community infrastructure.
5. In addition, within our response to EX224, we drew attention to delivery uncertainties arising from the proposed prior mineral extraction on the North West Hatfield site and possible complications from the Bromate Plume underlying the wider area. We consider the Inspector should explore those uncertainties before accepting the Council's assumption of a commencement of housing completions in 2023-4 at North West Hatfield (EX224).
6. For all these reasons, the full BGS allocation should be retained. North West Hatfield should not be prioritised over that allocation.