



Colin Haigh
Head of Planning

Reply to: address as below
Date: 9 October 2019

Melvyn Middleton
Planning Inspectorate
c/o Programme Officer
[REDACTED]

Dear Sir

Welwyn Hatfield Local Plan Examination

I write in response to your letter dated 8 August 2019 and following a meeting of our Cabinet Planning & Parking Panel (CPPP) which debated the Local Plan and its timetable.

As you are aware, this Council chose to submit a Local Plan which contained a strategy, policies and site allocations to deliver 12,000 homes over the period 2013-2032. The Council was aware that this was less than the objectively assessed need for housing, but after extensive evidence gathering and public consultation, felt that green belt harm and infrastructure issues weighed heavily against the borough's ability to meet its full need.

We were very grateful that you chose to adopt a pragmatic approach when progressing the examination and have provided the Council with guidance at the hearing sessions and in your letters on what further work we need to carry out to reach a sound position.

We understood your instruction that the Council should carry out a further green belt study, in order to test the various positions advocated by participants at the hearing sessions, and hopefully reach greater consensus on the value and harm of individual land parcels.

The Council considered very carefully how to best address the need for additional sites as expeditiously as possible and sought your advice on this matter last October. We did consider the option of selecting broad locations for growth in the later years of the plan, which would have been quicker than carrying out a further call-for-sites exercise, but were concerned about the difficulties of achieving soundness. We concluded that it was necessary to seek individual new site proposals, in order to avoid a possible challenge that less suitable sites had been selected. We put together an ambitious programme and had anticipated that this might yield a small number of new sites. We were therefore very surprised when we received 70+ new sites and 70+ re-promoted sites, some of which had never been fully assessed before because of their location, plus extensive supporting evidence. In hindsight we should have reflected more on this possibility when we devised the timetable in March 2019.

Your letter to the Council in October 2018 encouraged us to carry out further consultation, on these possible new sites, an approach that the Council agreed with, to ensure that our communities had the opportunity to comment on the merits and issues associated with

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new sites. The development plan system emphasises the importance of consultation in order for a plan to be found sound. The local elections meant that it was not possible to carry out consultation until May 2019 and we were then very surprised to receive over 10,000 representations, far in excess of anything we have ever received at previous stages of plan consultation.

Officers are working exceptionally hard to summarise all of the representations, complete new evidence studies (including landscape sensitivity study, green gap study, strategic flood risk assessment and sustainability appraisal) and then use this information to inform individual and cumulative site analysis work. The recruitment and retention of experienced staff remains a problem for all planning teams, and Welwyn Hatfield is no different. We have taken on six agency staff in recent months to help complete all of this work.

We are disappointed that it will not be possible to present site analysis work to councillors in September 2019 as previously proposed. We are also aware however that to present incomplete results would be unfair to councillors and all those residents and communities who have submitted comments. It would also place the Local Plan process in greater jeopardy of challenge. We want councillors to have all of the evidence available at the point they are asked to make a decision, to reduce the risk of a possible challenge.

We had hoped that it would be possible to simultaneously gather all of this site evidence and present it to councillors at the same time as scheduling hearing sessions to debate the latest housing and employment evidence. After careful reflection however we now consider it far preferable that officers focus on the site evidence and that site hearing sessions take place in February and March 2020, which creates sufficient time for all participants to properly prepare for them. We consider that hearing sessions on Birchall Garden Suburb and Symondshyde should also take place in February and March 2020, so that it is possible for councillors to consider existing sites in the submitted plan and possible new sites on a consistent basis in light of the latest green belt and other evidence.

For your information, the Chief Executive and I have recently met with senior civil servants from MHCLG to discuss the current situation and to identify practical and productive ways to progress the Local Plan and its examination. We emphasised that Welwyn Hatfield is working hard to help tackle the housing crisis by bringing forward housing in suitable urban locations such as Wheat Quarter and Welwyn Garden City and Hatfield town centres and were the first authority in the country to secure Accelerated Construction funding for such projects. We made it clear that we have no desire to withdraw the Local Plan or see it found unsound, as we consider that any amendments to the plan to make it sound would very likely be the same ones we intend to propose to councillors and to the examination in the near future if the timetable is allowed to continue.

I have also discussed these issues with officers from the Planning Advice Service (PAS) and they have offered a number of useful suggestions that we will be taking up as we prepare our site analysis work and recommendations for councillors.

We have therefore updated the timetable for all outstanding tasks and have identified the following milestones that we believe to be realistic and unlikely to slip:

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- Schedule hearing sessions for the week commencing 9 December 2019 to debate new evidence on the objectively assessed need for housing, new evidence on employment and the most appropriate plan period.
- Publish results and recommendations in early December 2019. This will include: finalise the Housing and Employment Land Availability Assessment (HELAA), Strategic Flood Risk Assessment (SFRA) and Sustainability Appraisal matrices of sites, infrastructure impacts and analysis of consultation responses; update the Site Selection Technical Paper to include assessment of all new reasonable alternatives and amendments to the assessment of previous reasonable alternatives in light of new evidence; update evidence on housing land and employment land supply.
- Present results and recommendations to Cabinet Planning & Parking Panel (CPPP) for debate on 12 December 2019 and decision-making on 17 December 2019. We propose to send the CPPP report and all background material to the programme officer as soon as it is published and the minutes of that meeting as soon as they are confirmed, to assist you in the early drafting of hearing session questions.
- Present results and recommendations to Cabinet on 6 January 2020.
- Present results and recommendations to Council on 7 January 2020.
- Schedule hearing sessions for the weeks commencing 24 February and early March 2020 to debate sites, including Birchall Garden Suburb and Symondshyde.

Please note that the Returning Officer strongly desires that all hearing sessions should conclude before local election purdah starts, normally on 24 March 2020.

I therefore hope that you will accept the enclosed timetable as the most appropriate that can now be achieved to balance speed, robustness and completeness.

Yours sincerely

Colin Haigh
Head of Planning

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