



**WELWYN
HATFIELD**

**Christopher Dale
Head of Planning**

Reply to: address as below
Date: 31 January 2022

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

Dear Sir

Welwyn Hatfield Local Plan

I am writing in response to your letter dated June 2021 and the accompanying Reports. The Council has now carefully considered your advice and the sites available to it to add further sites into the Plan.

The Council has also received advice from the Minister for Housing which has been taken into account in particular the importance the government places on the protection of the Green Belt. The Council is mindful of the fact that once land is removed from the Green Belt it cannot be put back even if there is a change in methodology relating to the calculation of housing need. Exceptional circumstances need to be justified for its removal.

The Council is disappointed in your conclusions on the FOAHN which represents a 58% uplift on the baseline data. It considered that the evidence had demonstrated that a lower FOAHN would have met the needs of the local economy. The continuing losses of employment land and the more recent announcement about store closures in Welwyn Garden City raise concerns about whether the projected increases in jobs, particularly in retailing, will occur on the scale envisaged.

The Council is concerned that the exceptional circumstances do not exist for removing so much land from the Green Belt to meet the entirety of the FOAHN when reforms of the planning system expected this year could reduce this need. Whilst an updated plan to reflect a changed approach could reduce the quantum of development it would not be able to reinstate land back in to the Green Belt. This concern particularly relates to releasing land which would result in high harm to the Green Belt.

Full Council have reviewed a strategy of sites which was not dependent on the release of high harm land from the Green Belt or the creation of a new settlement. They agreed to a development strategy which adds in sufficient sites to deliver 14,961 number of dwellings but which is subject to the removal of 1,682 dwellings from the submitted plan resulting in an overall total for the plan period of **13,279 dwellings**. This is set out in the schedule attached to this letter.

During the course of debate, Members commented on the trajectory and how close it was to meeting the requirement set out in paragraph 47 of the National Planning Policy Framework 2012 for a specific supply of sites for the first 10 years of the requirement. This

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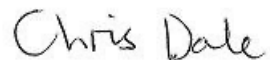
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would be similar to the approach accepted for the Eastleigh Local Plan which proposes an early review of the plan to deliver sites required to meet the need for housing in the last few years of the plan period. It was therefore suggested that we raise with you the prospect of bringing forward a plan with specific sites allocated over a 10 year period, which would meet the requirements of paragraph 47 of the NPPF.

Thank you for your consideration of the content of this letter and we look forward to your response.

Yours faithfully

A handwritten signature in black ink that reads "Chris Dale". The signature is written in a cursive, slightly informal style.

Christopher Dale

Head of Planning