

## NORTH HERTFORDSHIRE DISTRICT COUNCIL

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27 March 2020

Mrs Sue Tiley  
Planning Policy  
Welwyn Hatfield Borough Council

Our Ref: LP/14DtC/WH  
Your Ref:

By email only

Contact Officer : Clare Skeels  
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Dear Mrs Tiley

### **Welwyn Hatfield Local Plan – Proposed Changes to the Submitted Local Plan 2016 (Site Allocations) – February 2020**

Thank you for the opportunity to make comments on the Proposed Changes to the Submitted Local Plan 2016 consultation document.

North Hertfordshire District Council (NHDC) notes that following the examination hearing sessions, the Inspector has confirmed that the evidence presented justifies a full objectively assessed need for 800 dwellings per annum therefore the decision to consult on additional sites which will not meet the full objectively assessed need is questionable.

The consultation does not set out whether or how you intend to address the housing shortfall. I would reiterate the position set out in the agreement between our authorities (your reference DTC/2). This makes clear that no further growth could be sustainably accommodated in those parts of NHDC identified by your Council as forming part of a shared housing market area.

It is noted that Full Council will make a final decision on which changes to housing allocations it proposes to submit to the Inspector for examination.

NHDC has an interest in those sites which are close to the administrative boundary, particularly in Oaklands and Mardley Heath, Woolmer Green and Welwyn. As set out in our previous comments, we are concerned that there are insufficient infrastructure and mitigation measures to accommodate the additional development that is proposed. In particular, the Site Selection Background Paper 2019 (pg93) suggests that the construction of a new 2FE primary school at Knebworth might provide additional capacity in the primary school planning area. An allocation for a new primary school has been factored into the North Hertfordshire Local Plan in association with the levels of growth planned for Knebworth itself. The Infrastructure Delivery Plan for North Hertfordshire has been prepared in the context of the allocations in the Local Plan but does not take into account any additional development on the periphery of the adjoining authorities.

Our understanding is that Hertfordshire County Council's present strategy is to absorb additional demand from this part of Welwyn Hatfield through expansion of Welwyn primary North Hertfordshire District Council, Council Offices, Gernon Road, Letchworth Garden City, Hertfordshire, SG6 3JF

school. However, there will inevitably be some parental preference (from Woolmer Green in particular) for school places in Knebworth. This issue needs to be clearly understood and articulated so that development contributions can be appropriately collected and spent.

If these additional sites are included in the Local Plan to meet the objectively assessed need, NHDC would anticipate that additional work will be required to ensure that appropriate mitigation measures have been identified and that they are included in the allocation policies.

As outlined in our response to the “Promoted Sites Consultation 2019”, we would reiterate that you have regard to the aims of the emerging North Hertfordshire Transport Strategy and the detailed policy wording included in our Plan (as proposed to be modified) in relation to infrastructure and cumulative impacts. In particular, we would highlight the policy criteria attached to our own proposed sites in Codicote and Knebworth. At this stage, we request that any sites pursued by Welwyn Hatfield in close proximity to these settlements seek to incorporate similar requirements and / or do not frustrate the implementation of sites within North Hertfordshire.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Clark', written in a cursive style.

Councillor Paul Clark  
Executive Member for Planning and Transport