

WELWYN HATFIELD LOCAL PLAN

EXAMINATION HEARINGS

Stage 2: Overarching Strategy

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For the North Mymms District Green Belt Society

October 2017

Question 1: Housing Market Area

What is an appropriate HMA on which to base objectively-assessed need calculations for this LP? Has the Council used an appropriate area?

This has already been raised in Stage 1 of the Hearings. The Borough Council does acknowledge that Welwyn Hatfield forms part of a much wider housing market area (FHMA). Much of the pressure for additional housing arises from in-migration, particularly from the GLA.

In its response to the Inspector's preliminary questions (document EX11), the Borough Council asserts that, with the exception of East Herts Council, no other local authority has been willing to accommodate the housing shortfall for Welwyn Hatfield. This was confirmed at the Stage 1 hearing sessions – the Borough Council has based its strategy on the much tighter HMA. In our earlier submissions (dipps797), we have described this as an introspective approach. This has given rise to the challenges on the Borough Council's fulfilment of the Duty to Co-operate.

The failure to consider Welwyn Hatfield in a broader context does affect the soundness of the overall strategy which is set out in the Local Plan.

Question 2: Full Objectively Assessed Housing ~Need

Are the Council's successive forecasts of housing need robust and reliable? Is its methodology for calculating FOAHN sound?

- i) Demographic forecast of households. Is it unduly influenced by untypical historic circumstances?**

In the Regulation 19 submissions (dips775), the Society has referred to the Borough Council's Annual Monitoring Report 2015, which showed that there had been a peak period of housing completions during the five-year period 2003/04 to 2007/08. It is significant that within that period, the redevelopment of the former British Aerospace site at Hatfield was at its peak, accompanied by an expansion of the University of Hertfordshire. The Society believes that this period of rapid growth has unduly influenced the forecasts which underlie the housing strategy in the Local Plan.

In its response to the Inspector's preliminary questions (document EX11), the Borough Council stated that population growth had accelerated during the period 2011 – 2016. There had been an under-estimate of growth, coupled to a growth in student numbers at the University of Hertfordshire. The Society, however, questions whether the latest OAN figures are fully justified, given the uncertainty which has been created by the decision to leave the European Union. There are signs that this is affecting the rate of international migration and the numbers of international students applying to English Universities.

ii) Economic adjustment.

As stated in our earlier submissions (dipps775), the Society believes that the OAN range is too high, as it includes unduly high assumptions of economic growth in the Borough.

The Local Plan wrongly assumes that there is a straight correlation between the provision of new housing and more jobs. As we have pointed out (see dipps770), housing firms tend to target existing home owners. Thus, new properties are not necessarily going to support the expansion of the local labour force – they are just as likely to attract the better-off London commuters or retired persons. There is a complex relationship between the housing and jobs markets, which the Local Plan does not fully recognise.

iii) Market signals.

Are the FOAHNs being met within the relevant HMAs?

In its Regulation 19 submissions (dipps783), the Society has stated its view that the Council has not faced up to the realities of the housing market, either in the Local Plan or in the SHMA. Allocating land on the basis of the OAN on large sites means that the house builders will be able to choose from a surplus of land on those sites which offer the most profitable development prospects. The Plan clearly shows that these sites are predominantly in green field locations, with disproportionate demands on local services and infrastructure. Far from meeting local needs, these sites compromise the renewal of areas of existing housing most relevant to meeting the needs of newly-forming households in the younger age groups.

Is the assessment and provision of affordable housing sound?

The high proportion of housing on the market that consists of existing stock (over 90%) means that prices are insensitive to the volume of new house-building. Thus, the numbers of new dwellings are irrelevant unless they are genuinely affordable. No account has been taken of starter homes, which cannot be delivered unless they are truly accessible to younger home-seekers.

The Society is concerned as to whether affordable housing can be delivered for the needs of local people in the larger villages. Too much reliance is placed on s106 Agreements on the larger sites. Here the percentage of affordable housing is often challenged by developers on the grounds of viability. The Society supports the proposed target in policy SP7 for 35% of new dwellings to be affordable in the larger villages.

Question 3: Employment Forecasts.

Are the employment forecasts and targets appropriate?

The Society considers that the level of economic growth is too high, based on over-optimistic scenarios. In our Regulation 19 submission (dipps770 and 775) we point out that the level of growth is much higher than other Districts in Hertfordshire (at 1.6 jobs per

household, compared to a county average of 1.1 and the national average of 1.0. We believe that the Borough Council is unduly influenced by the Hertfordshire LEP Strategic Plan. The LEP does not specify particular levels of growth for Welwyn Hatfield, and there is little evidence provided by the LEP of excessive demand for land and premises. No account is taken by the LEP of land availability for employment purposes.

The Local Plan (paragraph 10.2) points out that there are significantly more jobs than the numbers of workers living in the Borough. This suggests that there are high levels of commuting, particularly along the A1 (M) corridor. To perpetuate these movements is unsustainable. The Borough Council, (in document ECO/9) accepts that job forecasts are sensitive to change.

The Society does not accept the high levels of job creation and the proposals to take more land from the Green Belt. More detailed comments will be made in Stage 4 of these Hearings, in respect of Chapter 20 and policy SADM30 (Land at Marshmoor).

Are they unduly influenced by one-off historic circumstances?

See the answer to Question 2 (i) above.

Question 4: Green Belt Review

Has an objective assessment of the contribution land makes to the purposes of the Green Belt been undertaken?

The Society has responded to the Borough Council's Green Belt Review 2016, particularly in respect of particular sites which were assessed as part of the SHLAA. Further representations will be made at Stage 4 of the Examination, with regards to sites which have been allocated in the Submission Local Plan.

The current Green Belt Review Stage 2 assesses the contribution of sites within the Borough Council area. No account seems to have been taken of the wider strategic context for the Green Belt beyond the Borough Council boundaries. This was addressed to some extent in the Joint Green Belt Review (November 2013), which was undertaken by the Borough Council together with Dacorum Borough Council and the City & District of St. Albans.

Do the proposed revisions to Green Belt boundaries result in stronger boundaries that will endure well beyond the life of this plan?

This is difficult to achieve in an area such as Welwyn Hatfield, where the whole of the Borough (outside of the towns and large villages) is covered by Green Belt. In these circumstances, the boundaries shown in the Local Plan are tightly drawn. The Society believes that there will be pressures for further Green Belt releases in the next reviews of the Local Plan. This is contrary to the fundamental aim of the Green Belt, as set out in paragraph 79 of the NPPF.

Question 5: Green Belt Exceptional Circumstances

What should constitute exceptional circumstances for removing land from the Green Belt?

In our submissions (dipps775), we have referred to the NPPF paragraph 14, which indicates that Local Plans should meet objectively-assessed needs of an area, unless “specific policies in this Framework indicate development should be restricted.” The footnote to paragraph 14 makes it clear that one of the specific policies is the Green Belt.

The Borough Council seems to argue that it had no choice but to remove land from the Green Belt. In the Society’s view, the housing figures in the Local Plan should not automatically be aligned with the OAN projection.

Has the choice of land to be removed from the Green Belt been objectively derived?

- i) Housing**
- ii) Employment**

The Borough Council’s assessment of a shortage of employment land is too little, at 5.4 hectares, to justify all of the Strategic Development Sites, including Marshmoor (Policy SDS7). The Society will make more detailed representations about this particular site at the site allocations stage of these Hearings.

Question 6: Spatial Vision and Settlement Strategy

Do they reinforce the Garden City and New Towns Heritage of the Borough, whilst maintaining the area’s distinctive character?

The Local Plan does contain policies which seek to protect the Garden City and New Towns heritage of the Borough. As we have pointed out in our submissions, the removal of areas from the Green belt would cause considerable harm to the overall character of Welwyn Hatfield.

Is the strategy being advanced consistent with the Borough’s Green Belt location?

As pointed out in earlier representations, the Society is concerned that the distribution of housing (as set out in Table 2 of the Local Plan) would remove substantial areas from the Green Belt, contrary to the NPPF. No special circumstances have been demonstrated by the Borough Council. In fringe areas, such as Little Heath, the Society suspects that there has been “double counting” with adjacent LPAs.

Is the strategy now being advanced really one that seeks to maintain the existing pattern of settlements?

Although the settlement strategy is broadly acceptable to the Society, the proposed removal from the Green Belt of a number of areas will threaten its integrity over the longer term. I

Question 7: Targets for Growth.

Are they appropriate?

i) Employment.

What are the ramifications of the loss of employment floor space to dwellings for future levels of employment?

In its submissions and in Policy SP8, the Council seems to accept that conversions of offices to residential use will continue at high levels, thus increasing the requirement for more employment land. The Society believes that this assumption is excessive, and that the rate of change will decline. In our submissions (dipps775), we refer to the uncertainty caused by BREXIT and the state of the national economy.

If the Council is concerned by this trend, it could introduce a policy to prevent or limit these changes of use, such has been introduced in a number of the London Boroughs.

ii) Housing.

Are the constraints imposed by infrastructure requirements fully justified?

The Plan clearly acknowledges that there are deficiencies in infrastructure provision – this is also confirmed in the 2016 HELAA. In the Society's submissions (dipps791), we state that too much reliance is placed on s106 contributions from developers. In the North Mymms part of the Borough, there are a number of highways constraints which are not addressed by the Plan. The focus of the pressures will be on the A1000, but the Society does have concerns about pressures on the network of rural roads. There are also problems associated with drainage, education, and health care provision – these will be addressed more fully in the Stage 4 discussion on sites.

Question 8: Five Year Land Supply

Are the Council's assumptions sound?

Is the proposed windfall allowance appropriate?

In document HOU/19, the Borough Council refers to a range of between 70 dwellings per annum to 110 dwellings per annum. This is not compared to past rates of windfall development. The Society submits that an increased allowance for windfall sites would reduce the pressures to remove land from the Green Belt.

Is the housing split trajectory sound?

The Society is concerned that the type and mix of housing proposed in policy SP7 is unsound (see submissions dips783). It is clear that the majority of households forming during the plan period will be in the youngest age groups. These are not the groups targeted by the private sector house builders.

It is likely that the needs to be addressed for these newly forming households will be from 2021 onwards. The Society supports a split trajectory because it is more realistic, given the constraints on infrastructure. It is important that this is coupled to a requirement for monitoring and an early review of the Plan.

Could the proposed housing development strategy result in a five year supply of housing land?

The proposed housing strategy could deliver a five-year supply of housing land, but it is doubtful because of the infrastructure constraints acknowledged by the Borough Council.

Question 9: Is the overall development strategy being advanced by the Council sound?

The Society is firmly of the view that the overall development strategy being advanced by the Borough Council.

The strategy is unjustified in terms of the housing and jobs numbers which are based on over-optimistic assumptions of employment growth.

It is ineffective, mainly because of the acknowledged deficit in infrastructure provision, which acts as a constraint on development.

It is contrary to national policy because of the amount of Green Belt land which would be released, contrary to paragraph 14 of the NPPF.

9th October 2017