

TPA/4

**Welwyn Hatfield Borough Council
Local Plan**

Housing Topic Paper

May 2017



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Introduction

The purpose of this paper is to describe the key steps taken to:

- Define Housing Market Geography - identifying cross-boundary relationships between Welwyn Hatfield and other areas;
- Assess the need for housing;
- Select sites for allocation in the Draft Local Plan Proposed Submission 2016;
- Identify the key issues arising from responses to the Draft Local Plan Proposed Submission 2016 where these relate to the Housing Market Geography and the Objectively Assessed Need for Housing;
- Update the assessment of the need for housing in light of more recent data-sets;
- Consider the implications for the scale of population, households and labour force growth implied by the provision of 12,000 homes in the DLPPS 2016; and
- Assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople.

The evidence base is signposted as relevant throughout this Topic Paper.

Background

- i) The Welwyn Hatfield Local Plan has taken shape over a number of years and the need for housing has been examined at various stages of plan-making in light of relevant national policy and practice guidance. A brief description of each stage of plan-making, the derivation of the housing target, the evidence base and key changes in national policy and practice guidance is set out below.
 - a) **Pre Issues and Options Consultation:** At this stage, the Regional Spatial Strategy - the emerging and then the adopted East of England Plan 2008 (REG 1) provided the framework for housing targets in Local Plans;
 - b) **Issues and Options Consultation (4 March to 11 May 2009):** At this stage, the adopted East of England Plan (EEP) 2008, set a housing target for Welwyn Hatfield of 10,000 additional homes between 2001 and 2021, (4,155 of which had already been built by April 2008). Policy SS3 identified Hatfield and Welwyn Garden City as *Key Centres for Development and Change* and Policy SS7 identified the need for strategic reviews of Green Belt boundaries in certain locations including *Welwyn/Hatfield, involving land in Welwyn Hatfield District and potentially St Albans District*. The Plan acknowledged that such reviews will result in significant change but could be made without eroding the principles and overall functioning of the Green Belt. Subsequently, the East of England Plan target for Welwyn Hatfield was deleted as a result of a High Court decision (20 May 2009);
 - c) **London Commuter Belt (LCB) West SHMA (ORS):** This was jointly commissioned by six Hertfordshire Districts and the County Council. The final report was issued in 2010. This identified Welwyn Garden City and Hatfield as a housing market sub-area with a cross boundary relationship with parts of Hertsmere. Relationships were also identified with East Herts and the Stevenage A1(M) sub-markets, but it was acknowledged that those areas have stronger market relationships with other areas. This SHMA was informed by 2004 based sub-national household and 2006 based sub-national population projections and the East of England Plan housing targets at April 2008 (i.e. pre-High Court

decision). Prepared in advance of the National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG).

- d) **How Many Homes Consultation (6 June to 18 July 2011)**: By this stage, the government had announced its intention to abolish Regional Spatial Strategies. Whilst the East of England Plan (EEP) was not revoked until January 2013, as the housing target for Welwyn Hatfield set out in the EEP had already been quashed as a result of a High Court decision in 2009, this left Welwyn Hatfield with no firm target with which to plan for (although the East of England Regional Assembly had published interim targets as part of its early plan review). The Council carried out consultation on a range of 5 alternative housing targets based on: Urban Capacity (2,925); the Interim East of England Plan Review (5,800); Long Term trends (7,600); the quashed East of England Plan target (10,000); and Official 2008-based Household Projections (14,400). A supporting paper was produced as part of this consultation¹. Prepared in advance of the National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG), this did not include any adjustment for market signals, affordability etc. and it is now superseded by more up-to-date data and evidence.
- e) **Future Housing Targets, Tenures and Sizes (January 2012) (Fordham Research)**: Informed by 2008 based sub-national population projections. This work explored the balance of housing tenures and dwelling sizes likely to be required in light of a range of housing target scenarios – demographic and jobs driven, and policy constrained. This work was not intended to be a full SHMA, so it did not examine housing market geographies. It was prepared in advance of the NPPF and national PPG. It does not include any adjustment for market signals, affordability etc. It is now superseded by more up-to-date data and evidence.
- f) **National Planning Policy Framework (March 2012)**: The NPPF advises that local planning authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries, identifying the scale and mix of housing and range of tenures the population is likely to need over the plan period which meets household and population projections².
- g) **Emerging Core Strategy (12 November 2012 to 31 January 2013)**: The *Housing Background Paper Part 1 – Objective Assessment of Housing Requirements - September 2012*³ was prepared to inform the Emerging Core Strategy (ECS). This examined a wide range of demographic, economic and affordability scenarios and indicators as well as considering the relevant policy framework; and feedback and responses from community and wider consultation. The Background Paper was informed by 2008 based sub-national population and household projections. It highlighted that initial data releases from the Census 2011 suggested that Welwyn Hatfield's population had been over-estimated in pre-Census mid-year estimates. At this stage, the Council consulted on a draft housing target of 7,200. Responses to consultation on the Emerging Core Strategy commented that whilst the Background Paper comprised the type of assessment required, it did not incorporate full modeling, which would require the

¹ Welwyn Hatfield Housing Target Consultation 2011, Supporting paper:

http://consult.welhat.gov.uk/portal/planning_policy/core_strat/csht?tab=files

² National Planning Policy Framework (paragraph 159):

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

³ Welwyn Hatfield 2012 Housing Background Paper 1:

http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_november_2012/ecs?tab=files

assistance of specialist consultants. This work is now superseded by more up-to-date data and evidence.

- h) **National Planning Practice Guidance:** The 'Housing and Economic Development Needs Assessments' Planning Practice Guidance (PPG) was issued in March 2014 replacing an earlier beta version from August 2013 and previous 2007 DCLG guidance, setting out the approach to defining housing market areas and assessing need⁴. It has been subject to subsequent updates.
- i) **Local Plan Consultation - 23 January to 20 March 2015:** At this stage, the Council had decided to progress with the production of a single Local Plan (rather than a Core Strategy and other development plan documents). The Local Plan Consultation (LPC) 2015 explained that the evidence that informed the Emerging Core Strategy was now out of date and a new Strategic Housing Market Assessment (the Welwyn Hatfield Strategic Housing Market Assessment 2014⁵) had been carried out, which had **objectively assessed the need for housing** in the borough to be in **the region of 625 dwellings per annum, equivalent to 12,500 dwellings between 2011 and 2031**. The LPC explained that the objectively assessed need for housing would be reviewed prior to the Council submitting the Local Plan for examination in light of updates to the official household projections.
- j) **Draft local Plan Proposed Submission – 30 August to 24 October 2016:** At this stage, the Council's evidence base had been updated to take account of more up to date data-sets. Two updates - The 'Welwyn Hatfield SHMA Partial Update (2015)⁶'; and the 'Welwyn Hatfield SHMA Partial Update Addendum: Responding to the Economy Study Update (2016)⁷' informed this stage of plan-making. The conclusion of the 'SHMA Partial Update Addendum: Responding to the Economy Study Update (2016)' was that the analysis supported the use of **the OAN range of 664 to 707 d.p.a.** as set out in the previous 2015 SHMA Partial Update. This represented **an uplift of between 16% and 23% from the demographic 'starting point'** informed by the 2012 sub-national household projections (SNHP). This OAN range was equivalent to **a need for 12,616 to 13,344 dwellings over a 19 year period 2013-2032**.
- ii) All stages of consultation and the preparation of background evidence up to, and including the Emerging Core Strategy 2012 were either predicated on the Regional Spatial Strategy (the East of England Plan) which was subsequently revoked by the Government or on approaches to assessing housing need, which were carried out in advance of the publication of the current national Planning Practice Guidance on 'Housing and Economic Development Needs Assessments' and assessments carried out at these stages were informed by pre-Census 2011 population and household projections. As such, they are considered to be superseded by more recent technical work. These stages are not therefore referred to further in this Topic Paper.

⁴ National Planning Practice Guidance: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁵ Welwyn Hatfield SHMA 2014: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=9428&p=0>

⁶ Welwyn Hatfield SHMA Partial Update 2015: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=10575&p=0>

⁷ Welwyn Hatfield SHMA Partial Update Addendum: Responding to the Economy Study Update 2016: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=11222&p=0>

Section 1: Defining Housing Market Geography

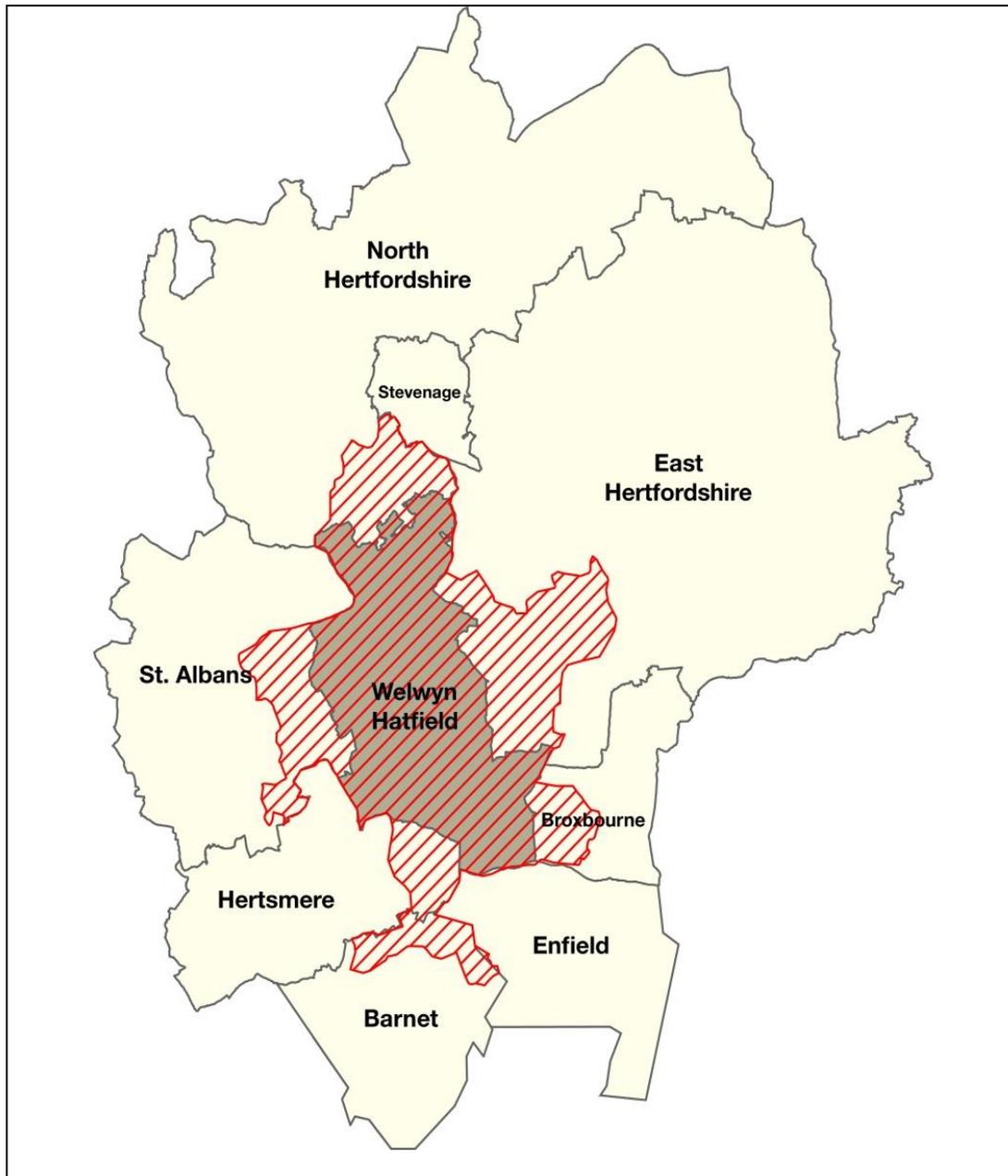
- 1.1 The Council appointed independent specialists, Turley Associates (now known as Turley), in 2013 to prepare a Strategic Housing Market Assessment (SHMA) for Welwyn Hatfield Borough Council, consistent with the National Planning Policy Framework (NPPF) and the relevant national planning guidance. Demographic evidence was provided throughout all SHMA work by independent specialists, Edge Analytics. One of the first tasks for Turley was to define an appropriate housing market geography. A key stakeholder event was held in 2013 and the evidence base of surrounding authorities was taken into account.
- 1.2 Following the guidance and definitions available at that time, the 2014 SHMA concluded that the administrative area of Welwyn Hatfield did not represent a self-contained housing market area (HMA). Two market areas centered on the borough were identified.
- 1.3 A wider functional HMA was identified based on local authority boundaries but further analysis concluded that a more tightly defined housing market area could be identified highlighting stronger cross-boundary market relationships with parts of neighbouring authority areas. The defined housing market area identifies cross-boundary relationships (at ward level analysis) with parts of:
 - Broxbourne;
 - East Hertfordshire;
 - Hertsmere;
 - North Hertfordshire;
 - St Albans; and
 - The London Borough of Barnet.
- 1.4 The wider Housing Market Area includes the whole of these authority areas plus the whole of Stevenage and the London Borough of Enfield.
- 1.5 The 2015 Welwyn Hatfield SHMA Partial Update reviewed the SHMA evidence for areas proximate to Welwyn Hatfield. None of these SHMAs identified Welwyn Hatfield as an integral part of another area's HMA or included it within their calculation of the OAN.
- 1.6 Further SHMA evidence was subsequently published for areas proximate to Welwyn Hatfield. The overall picture is a complex one that can be summarized as follows:

The Welwyn Hatfield HMA

- 1.7 The defined Welwyn Hatfield HMA comprises Welwyn Hatfield and parts of Broxbourne, East Herts, Hertsmere, North Herts, St Albans and the London Borough of Barnet. (The wider HMA includes all these authority areas together with Stevenage and the London Borough of Enfield)⁸.

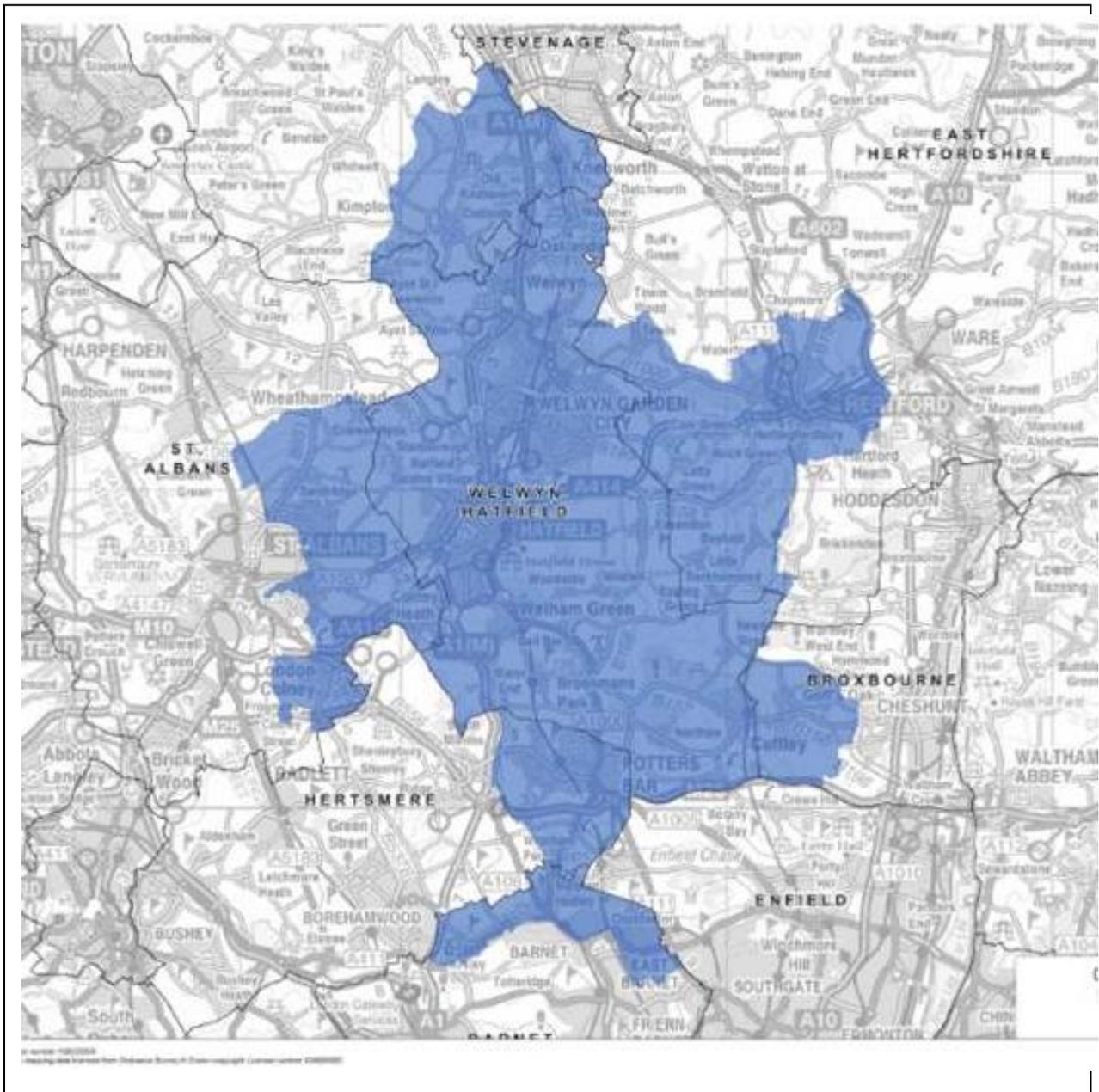
⁸ Welwyn Hatfield SHMA 2014: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=9428&p=0>

Figure 1: The Welwyn Hatfield Housing Market Area



**The tightly defined Welwyn Hatfield HMA is defined in red.
The Wider Housing Market Area is shaded in yellow**
(Source: Turley, 2013)

Figure 2: The tightly defined Welwyn Hatfield HMA



(Source: Turley, 2013)

The South West Herts HMA

- 1.8 Dacorum, Hertsmere, Three Rivers and Watford Councils all have adopted Core Strategies but with a view to future plan reviews, commissioned a joint SHMA. Welwyn Hatfield attended the Project Advisory Group throughout the commission. The SW Herts SHMA acknowledges a cross-boundary relationship with Welwyn Hatfield, which is inevitable at the margins of most HMAs. However, on a 'best fit' whole local authority basis, the SW Herts SHMA concludes that the strongest market relationships point to a HMA comprising the authority areas of Dacorum, Hertsmere, St Albans, Three Rivers and Watford⁹.

(St Albans has not agreed with these findings).

The St Albans HMA

- 1.9 The St Albans SHMA¹⁰, was published in advance of the SW Herts SHMA. This concluded that St Albans has a Core HMA which approximates with the district boundary (ES 27) although it acknowledges that this is immediately connected to a wider housing market area (including Welwyn Hatfield) and a peripheral housing market area with London Boroughs. Some ambiguity exists around the HMA definition within the St Albans SHMA – with references in the evidence base to the Core HMA extending slightly beyond district boundaries (para. 1.64) and a series of Maps 1.3, 1.4 and 1.7 all showing the Core HMA extending beyond district boundaries; and correspondence from SACD indicating that its Core HMA matches St Albans LPA¹¹.

The East Herts SHMA

- 1.10 The West Essex and East Hertfordshire SHMA concludes that East Hertfordshire, Epping Forest, Harlow and Uttlesford represent the most appropriate 'best fit' for the West Essex and East Hertfordshire HMA¹²

The Stevenage HMA

- 1.11 The Housing Market Areas in Bedfordshire and surrounding areas report¹³ identifies a 'best fit' HMA based on the whole local authority areas of Stevenage and North Herts. It does identify a market relationship with Welwyn Hatfield. However, it concludes that Welwyn Hatfield residents represent only 16% of the total HMA population and there does not appear to be an overwhelming need for Welwyn Hatfield to be part of the best fit Stevenage HMA, which is consistent with the approach taken to Central Bedfordshire, which represents 21% of the HMA population and is also not included within the Stevenage HMA.

⁹ SW Herts SHMA - January 2016: <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/SW-Herts-SHMA-Final-Report-Jan16.pdf>

¹⁰ St Albans SHMA - December 2013: http://www.stalbans.gov.uk/Images/SP_EB_SHMA_tcm15-39883.pdf

¹¹ SACD email to SW Herts: http://www.stalbans.gov.uk/Images/SP_SLP_REP-872722-970262-831896-978253-1gAppendix7StAlbansCityDistrictCouncil'sresponsetoAppendix6recieved1022016_tcm15-55938.pdf

¹² East Herts SHMA - September 2015: <http://www.eastherts.gov.uk/shma>

¹³ HMA in Bedfordshire and surrounding areas – December 2015: <http://www.stevenage.gov.uk/content/15953/26379/43876/Housing-Market-Areas-2015.pdf>

The Broxbourne HMA

- 1.12 The Broxbourne SHMA¹⁴ concludes (paragraph 1.10) that the Borough forms a reasonable HMA with market linkages to the northern parts of Enfield and the southern parts of East Hertfordshire. East/West links (Welwyn Hatfield lies to the west of Broxbourne) are not considered to be strong although there is some evidence of the market extending eastwards into Epping Forest¹⁵.

The London Boroughs of Barnet and Enfield HMA

- 1.13 The North London SHMA was commissioned by the North London Partnership – a group of seven London Boroughs including Barnet and Enfield. A series of Local Area Reports were produced, including one for Barnet in 2011¹⁶. Enfield has subsequently updated its evidence base¹⁷ in 2015. Whilst it highlights limited links to parts of Welwyn Hatfield and Broxbourne, it concludes that the data suggests that Enfield could be considered to be a single local market area (Paragraph 2.11.5).

Overall picture of Housing Market Areas

- 1.14 There is a complex set of inter-relationships between Welwyn Hatfield and other Hertfordshire and north London authority areas. Whilst cross-boundary relationships are identified between Welwyn Hatfield and other areas in SHMA evidence, no other SHMA has identified Welwyn Hatfield as falling within their HMA.

¹⁴ Broxbourne SHMA May 2013:

https://www.broxbourne.gov.uk/sites/default/files/Documents/Planning_Policy/pp_Justin_Gardner_Broxbourne_SHMA.pdf

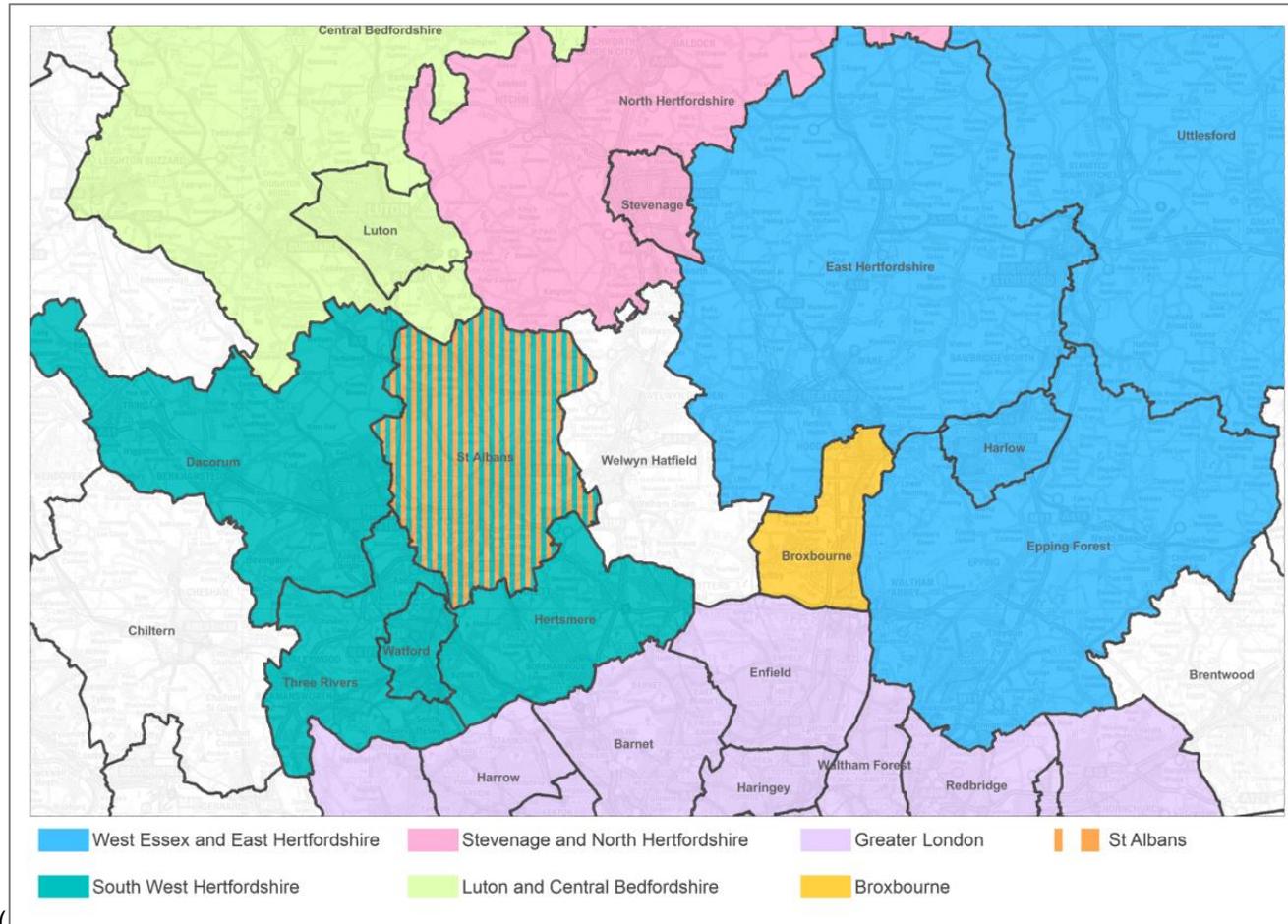
¹⁵ Broxbourne SHMA – May 2013:

http://www.broxbourne.gov.uk/sites/default/files/Documents/Planning_Policy/pp_Justin_Gardner_Broxbourne_SHMA.pdf

¹⁶ London Borough of Barnet SHMA – March 2011: <https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/ldf-evidence-and-supporting-documents/strategic-housing-market-assessment.html>

¹⁷ London Borough of Enfield SHMA 2015: <https://new.enfield.gov.uk/services/planning/planning-policy/area-action-plans/planning-strategy-enfield-strategic-housing-market-assessment.pdf>

Figure 3: An overall picture of Housing Market Areas



Source: Turley 2015)

Section 2: The Objectively Assessed Need for Housing

The Welwyn Hatfield SHMA 2014

- 2.1 The programme for the Welwyn Hatfield SHMA 2014¹⁸ was extended to integrate the release of the **2012-based sub-national population projections (SNPP)** and to take account of **the Welwyn Hatfield Economy Study 2014**¹⁹. Demographic evidence was provided by Edge Analytics. Key stakeholders were engaged in the SHMA from the early stages and the evidence base of surrounding authorities was taken into account. The final version of the SHMA was published in September 2014, taking full account of the national Planning Practice Guidance (PPG). It concluded that the Objectively Assessed Need for housing in Welwyn Hatfield was **in the region of 625 dwellings per annum**, equivalent to 12,500 dwellings between 2011 and 2031.
- 2.3 Consistent with the advice in national PPG, the SHMA reviewed and built upon the SHMA evidence base of areas proximate to Welwyn Hatfield. On this basis, it highlighted a suggested additional OAN of 13,319 within the defined Welwyn Hatfield HMA – although it advised that this figure should be treated with considerable caution, given the assumptions used to derive it. (As noted in the previous section, in light of evolving housing market area definitions, in subsequent Welwyn Hatfield SHMA work it was not considered appropriate to continue with this level of analysis but the wider OAN evidence has continued to be monitored).

The Welwyn Hatfield SHMA Partial Update - 2015

- 2.4 A partial update to the SHMA was published in October 2015²⁰. Demographic evidence was again provided by Edge Analytics. This partial update took account of the release of the **2012-based sub-national household projections (SNHP)** and considered comments received by the Council on the SHMA during the Local Plan consultation in spring 2015. It also reviewed the OAN and the need for affordable housing. This update concluded that **the OAN fell within a range of 664 to 707 d.p.a.**, with the upper end of the OAN being more reflective of the full need for housing in Welwyn Hatfield. Noting the change in the period of analysis, this is equivalent to 12,616 and 13,433 dwellings between 2013 and 2032. The analysis indicated a need for 755 affordable homes annually in the borough to 2020, reducing to 539 affordable homes after five years.

Welwyn Hatfield SHMA Partial Update Addendum: Responding to the Economy Study Update (2016)

- 2.4 The publication of the Welwyn Hatfield Economy Study Update in late 2015²¹ resulted in the preparation of an Addendum report to the SHMA²², again with demographic inputs provided by Edge Analytics. This Addendum considered the implications of the Economy Study Update on the OAN. This was published in January 2016. It concluded that OAN range in the 2015 Partial update remained appropriate. This represented **a 16% - 23% uplift from the demographic 'starting point'** (at this time, the 2012-based SNPP and SNHP).

¹⁸ Welwyn Hatfield SHMA 2014: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=9428&p=0>

¹⁹ Welwyn Hatfield Economy Study 2014: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=9295&p=0>

²⁰ Welwyn Hatfield SHMA Partial Update 2015: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=10575&p=0>

²¹ Welwyn Hatfield Economy Study Update 2015: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=10775&p=0>

²² Welwyn Hatfield SHMA Partial Update Addendum: Responding to the Economy Study Update 2016: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=11222&p=0>

Section 3: Housing Land Supply in Welwyn Hatfield

The Housing and Employment Land Availability Assessment 2016 (HELAA)

- 3.1 The Council's HELAA was published in June 2016²³. This document combined and updated previous Strategic Housing Land Availability Assessments (SHLAA). The primary aims of the HELAA were to:
- Combine the assessment of urban and Green Belt sites and windfall into a single document;
 - Incorporate an assessment of Gypsy and Traveller and employment sites alongside housing sites;
 - Update the methodology for assessing the suitability of sites following representations made during the Local Plan Consultation 2015 and to better align it with Planning Practice Guidance;
 - Assess the suitability of sites with potential for development (with reference to policy constraints, physical site constraints, environmental impacts, development potential);
 - Assess if sites are available for development (reflecting information around site promotion, land ownership, restrictive rights, covenants or agreements);
 - Determine if sites have any viability or other achievability issues that could impact on delivery (reflecting the Council's evidence base on viability across the borough and any potential significant abnormal costs that may be associated with a site);
 - Assess if sites are deliverable within the first five years of the Local Plan's adoption, or are developable later in or beyond the plan period (reflecting known constraints that may need to be overcome, e.g. upgrades to infrastructure, multiple landownership, third party landownership etc.).
- 3.2 The Report sets out the methodology used - including the stages of assessment, the consideration of suitability, availability and deliverability. It also includes an assessment of windfall sites, which subsequently informed a windfall allowance for the Local Plan.
- 3.3 A two stage assessment process was used to assess sites in the HELAA. The Stage 1 assessment involved an initial sieving of sites, having regard to the need to promote sustainable patterns of development, channeling development towards the towns and villages inset within the Green Belt consistent with paragraph 84 of the NPPF. It also considered whether there were any significant policy or environmental constraint. Sites falling into one of the following (summarized) categories failed Stage 1 of the HELAA:
- The site is not within or adjoining a settlement excluded from the Green Belt – the most sustainable locations in the borough. Exceptions were made for sites capable of forming a new settlement, and for Gypsy and Traveller development (where national policy allows for Green Belt in-setting);

²³ Welwyn Hatfield HELAA - June 2016: <http://www.welhat.gov.uk/article/6379/Housing-and-Employment-Land-Availability-Assessment-2016-HELAA>

- The site is partially or wholly within a designated or proposed Employment Area – reflecting the need to protect employment land for future economic needs;
 - All or the majority of the site is designated as a Special Area for Conservation, Special Protection Area, Site of Special Scientific Interest, Registered Historic Park and Garden, Local Nature Reserve and/or a Local Wildlife Site – reflecting the need to protect nature conservation or historic asserts of national or local importance;
 - The entire site is designated as Flood Zone 3 – reflecting the need to avoid development in areas of high flood risk; and
 - There is a significant physical or legal barrier to development.
- 3.5 Those sites that passed the Stage 1 assessment, proceeded to a more detailed level of assessment (Stage 2). A series of appendices support the main report. Appendix G comprises a series of twelve settlement or rural area site based assessments. Each site assessment concludes on whether the site is considered to be suitable, available and achievable. It also identifies the estimated delivery timescale and an estimated site capacity. This is a comprehensive piece of work and is considered to be robust and proportionate to the preparation of a Local Plan.
- 3.6 The HELAA concluded (Table 7) that there was development potential for 2,038 dwellings arising from sites in urban areas and 9,751 dwellings relating to sites in the Green Belt for **(a total potential of 11,789 dwellings)**.
- 3.7 However, simply because a site was found suitable, available and achievable in the HELAA, did not automatically mean that it was proposed for allocation in the Local Plan. Further consideration was given to the HELAA assessments alongside other matters, which were weighed and balanced in order to reach a set of conclusions. These were set out in a Housing Sites Selection Background Paper 2016.

The Housing Sites Selection Background Paper 2016

- 3.8 This Background Paper²⁴ comprises a main report and a series of appendices with maps of sites identifying whether they passed or failed the two stage HELAA assessment. Sites that passed the second stage of the HELAA assessment were considered further in this Paper.
- 3.9 This Sites Selection Paper brings together key conclusions from various pieces of evidence work and appraisals:
- The HELAA;
 - The Green Belt Review (Stage 1 and Stage 2)²⁵;
 - An appraisal of Green Belt boundaries on a site by site basis;
 - The Sustainability Appraisal;
 - Flood Risk²⁶ - Sequential Test work²⁷; and
 - The identification of strategic advantages and disadvantages.

²⁴ Welwyn Hatfield Housing Sites Selection Background paper 2016:

<http://www.welhat.gov.uk/housingsiteselection>

²⁵ Green Belt Review: <http://www.welhat.gov.uk/article/5521/Green-Belt>

²⁶ SFRA Level 1 and 2 - 2015: <http://www.welhat.gov.uk/article/6206/Strategic-Flood-Risk-Assessment-Level-1-and-Level-2>

²⁷ Flood Risk Sequential and Exceptional Test 2016: <http://www.welhat.gov.uk/article/6378/Flood-Risk-Sequential-and-Exception-Test-Document-June-2016>

- 3.10 Weighting was applied to key findings from the above strands of work and consideration was given to whether sites should be considered for allocation in the Local Plan.
- 3.11 For the HELAA all sites with a reasonable prospect of delivery within the plan period were afforded a positive weight. Sites expected to be delivered in the early to mid-parts of the plan period were given a more favourable weighting than sites that carried a degree of uncertainty (due to the need to overcome noted constraints) and were not expected to come forward until the later part of the plan period or beyond the plan period.
- 3.12 For the Green Belt Review, weight was afforded depending on the contribution a site makes to Green Belt purposes.
- 3.13 For Green Belt boundaries, account was taken of the need to clearly define boundaries using physical features that are readily recognisable and likely to be permanent; and consideration was given to the strength of the existing Green Belt boundary. It was also recognised that some sites fell within a 'fragile' gap (where the gap between towns, or towns and villages, or villages to villages was less than 1km). In these instances, the impact on the potential reduction of such a gap was also considered.
- 3.14 For the Sustainability Appraisal, weight was afforded to the balance between the significant positive and significant negative effects against a set of 22 sub-objectives assessed in the Sustainability Appraisal.
- 3.15 For Flood Risk, the HELAA has already excluded development potential from areas Flood Zones 2 and 3. All the sites in the Paper passed the Sequential Test, and as a result, no weighting was given to any one site over another as they were all equal in this respect. (Notes were made on a site by site basis however, if certain measures or further assessment may be appropriate).
- 3.16 Whether or not a site was likely to result in any strategic advantages or disadvantages was also considered, e.g. the delivery of important community infrastructure such as the land required to deliver a secondary or primary school in an appropriate location, without which the planned level of growth could not be supported.
- 3.17 The potential capacity of sites was reflected against the Objectively Assessed Need for Housing, which for illustrative purposes, was distributed across the borough on a proportionate basis. However, the paper noted that this was a mathematical starting point and not necessarily the distribution of growth that would be taken forward in the Local Plan, which would respond to the different opportunities for achieving sustainable development in different areas.
- 3.18 Key findings from each of the strands of work listed above were weighed and balanced and a conclusion drawn as to whether a site should be considered for allocation. This included a consideration of the potential for cumulative impacts, e.g. where the delivery of a site would be inter-related to another site, consideration was given to the collective contribution that a group of sites make to the purposes of including land in the Green Belt.
- 3.19 Consideration was also given, on a settlement by settlement basis, to infrastructure constraints. For example, the level of development potential from sites may result in the need for an expanded or new school. Advice was sought from Hertfordshire

County Council as Education authority as to the capacity of existing schools within the relevant school planning area (these vary at secondary and primary level) to accommodate growth. Where capacity was not available, advice was sought on the need for additional capacity and account was taken of the ability to deliver solutions at that time. Note was made of the fact that Hertfordshire County Council had commenced a 'search for sites' for secondary school provision. This would explore the potential for additional sites, over and above those already proposed as part of the strategic development sites.

- 3.20 Reference was also made to any known key utilities infrastructure or highways constraints with the identification of congestion points at certain junctions and improvements/capacity enhancements needed to accommodate growth.
- 3.21 Whilst some sites had been found to be suitable, available and deliverable, and on their own – suitable for allocation, infrastructure constraints limited the overall level of growth at certain settlements, e.g. Welham Green – where a group of 6 sites were found to be suitable for development but individually, did not offer any strategic advantages and the lack of primary school capacity in Welham Green with no site identified to resolve the lack of capacity, meant that none of these six sites were proposed for allocation in 2016.
- 3.22 The Paper was presented to the Council's Cabinet Housing and Planning Panel (CHPP) on 13 June 2016 with recommendations on which housing sites should be selected for development in the 2016 Draft Local Plan Proposed Submission Document. (Because the background paper was written prior to the finalization of the Draft Local Plan Proposed Submission, it should be noted that the Sustainability Appraisal conclusions were interim at that point).
- 3.23 CHPP considered the officers' report. The minutes of the Council's Cabinet Housing and Planning Panel record²⁸:

“That having considered all of the information provided that the sites proposed by Officers be approved with the addition of site Hat11 and the deletion of any reference to site Hat2 and that the Head of Planning now draft the proposed submission Local Plan on the basis of these sites.”

Windfall Allowance

- 3.24 Whilst the Council makes every reasonable effort to identify suitable development sites with a reasonable prospect of delivery within the plan period, inevitably other sites will come forward for development unexpectedly. Such 'windfall' sites can arise for a number of reasons.
- 3.25 The NPPF allows planning authorities to include an allowance for windfall sites where there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- 3.26 The Council's assessment of windfall capacity has been kept under review throughout the plan-making process. An initial technical report was published in October 2012²⁹. Comments were received during the Emerging Core Strategy Consultation

²⁸

²⁹ SHLAA phase 3 – Determining the potential for housing windfall:
<http://www.welhat.gov.uk/CHttpHandler.ashx?id=6204&p=0>

2012 and the evidence base was reviewed with a report issued in November 2014³⁰. The Local Plan Consultation 2015 – Consultation Statement notes that a number of responses commented on the approach taken to windfalls. The majority of those responses considered that the windfall allowance (at that stage) was too low, failing to take adequate account of opportunities that were likely to arise over the plan period.

- 3.27 Stage 3 of the HELAA 2016 (3.4 to 3.4.16, together with Appendix H and I)³¹ provides an up-to-date assessment of windfall supply, assessed at town, village and rural levels and by typology. Historic windfall trends were assessed over a 15 year period; a suitably long period to allow for reliable historic averages and trends to be established. The HELAA sets out the methodology used.
- 3.28 Between 1 April 2001 and 31 March 2016, 25.2% of dwelling completions were attributed to windfalls and it is considered that compelling evidence exists to demonstrate that windfall sites have provided a reliable source of supply. A thorough review of windfall potential from various land uses was undertaken. This work concluded that reasonable windfall allowances should be made for 7 categories of land-use. No allowances were made for 12 other land-use categories. The overall core windfall projection is for 70 dwellings per annum, doubling to 140 dwellings per annum for the final 5 years of the plan period. In addition, a specific windfall allowance is made for development within Hatfield Town Centre, where a number of development opportunities are expected to come forward. A single allowance of 125 dwellings was added, although it was noted that a higher number may be delivered. The total windfall allowance is as follows:

Table 1: Plan period windfall allowance

Core windfall allowance: 70 d.p.a. 2020/21 to 2031/32	840 dwellings
Additional allowance: 70 d.p.a. 2027/28 to 2031/32	350 dwellings
Hatfield Town Centre Allowance: 125 over plan period	125 dwellings
Total plan period windfall allowance	1,315 dwellings

Overall Housing Land Supply

- 3.21 The result of the Site Selection process, together with the windfall allowance, an allowance for applications awaiting determination, completions, capacity on sites with planning permission and a deduction for the non-implementation of planning permissions was a total housing capacity of just over 12,000 new homes between 2013 and 2032. This was set out in Table 2 - Distribution of housing growth, in the Draft Local Plan Proposed Submission 2016. This table is re-produced on the next page.

³⁰ SHLAA Phase 3 – Windfall: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=9598&p=0>

³¹ HELAA 2016: <http://www.welhat.gov.uk/article/6379/Housing-and-Economic-Land-Availability-Assessment-2016-HELAA>

Table 2: Distribution of Housing Growth (Table 2 of the Draft Local Plan Proposed Submission 2016)

Sub -area	Completions 2013-2016	Capacity within urban areas and from planning permissions 2016-2032 ³²	Capacity from Green Belt/Area of Special of Restraint release 2016-2032	Total Capacity 2013-2032
Welwyn Garden City	359	2,424	2,140	4,923
Hatfield	481	685	1,770	2,936
Woolmer Green	0	4	150	154
Oaklands & Mardley Heath	9	16	31	56
Welwyn	133	153	67	353
Digswell	3	12	0	15
Welham Green	23	6	92	121
Brookmans Park	6	53	274	333
Little Heath	1	5	135	141
Cuffley	32	98	286	416
Rural Areas	10	28	1,144	1,182
Sub-total	1,057	3,484	6,089	10,630
Allowance for applications awaiting determination	Planning applications currently awaiting determination which are estimated to deliver dwellings by 2020			79
Allowance for windfall	Average of 110 dwellings p.a. from 2020-2032 (12 yrs) ³³			1,315
Deduction for non-implementation	A non-implementation rate of 2.5% (the historic average level of dwellings permitted but not built. ³⁴			-20
Total				12,004

³² As of 31/07/2016

³³ 70 dwellings p.a 2020/21-2026/27 (7 yrs) then 140 p.a. 2027/28-2031/32 (5 yrs), in addition to 125 dwellings identified by Hatfield 2030+ as likely to come forward in Hatfield Town Centre within the plan period

³⁴ Applied to 798 dwellings which are currently permitted but have not commenced construction.

Section 4: Responses to the Draft Local Plan Proposed Submission 2016 (OAN and HMA - Main Issues)

4.1 The Draft Local Plan Proposed Submission 2016 was published for consultation between 30 August and 24 October 2016. The following is a summary of responses received to the Draft Local Plan Proposed Submission 2016 where these relate to the HMA and the OAN:

- The approach to defining the housing market area was acknowledged as complex. This was seen to justify continued joint working across boundaries to ensure that housing needs are met in full across the wider area;
- The release of the 2014-based population and household projections, and the implications of this new dataset which project a higher level of household growth over the plan period in Welwyn Hatfield, should be taken into account;
- The OAN should be lower or higher - with reference made to one-off historical events or other data inputs that inform the SHMA. A number of representations highlighted concerns around the scale of population growth projected, which was seen as high and unduly influenced by the historic development of Hatfield Aerodrome and the growth of the borough's universities in the recent past;
- The evidence should be reviewed in light of the decision to leave the European Union (EU) and the likely impact on future international migration from the EU;
- Recognition of the substantial need for affordable housing in Welwyn Hatfield, and the need to increase housing delivery if this were to be met in full;
- The allowance for likely future change in the relationship with London was welcomed and endorsed, as was the approach to test longer-term migration trends, although some felt that any longer time period was unlikely to present a more accurate projection than the latest official ONS dataset;
- A number of representations, including the House Builders Federation (HBF), endorsed the methodology applied in the 2015 SHMA Partial Update and the concluded OAN range. The point was stressed, however, that the upper end of the OAN range should be used to inform the housing requirement in the Draft Local Plan. ;
- One comprehensive alternative assessment of OAN was submitted. This concluded with a higher OAN for Welwyn Hatfield than identified in the SHMA and referenced the methodology recommended by the Local Plans Expert Group (LPEG). It is understood that the assessment integrated the latest 2014-based projections, which are subsequently uplifted to reflect fixed longer-term average migration counts³⁵ and the application of further uplifts in response to market signals and affordable housing need; and

³⁵ It is noted that the document does not explicitly set out the methodology used. The approach of using 'fixed' historic migration rates differs from that consistently used by Edge Analytics in the modelling undertaken for the Council which applies migration rates which more closely reflects the approach adopted by the ONS in the generation of their SNPP datasets.

- Although some responses raised concerns that the OAN elevated needs beyond the demographic baseline projection, others were reassured that this approach positively contributes towards significantly boosting housing supply in line with the objectives of the NPPF.
- 4.2 The Council considers that the Draft Local Plan Proposed Submission 2016 was informed by a robust evidence base on the need for housing and many of the matters raised in representations had already been considered in the existing evidence base.
- 4.3 However, the Council recognized that more recent data-sets had been released since the last SHMA update and a further review of the Welwyn Hatfield SHMA (with updated demographic modelling) was subsequently commissioned.

Section 5: Update to the Objectively Assessed Need for housing (2017)

- 5.1 As noted above, subsequent to the Welwyn Hatfield DLPPS 2016 consultation, an update to the SHMA (and demographic modeling) was commissioned. This Update provides³⁶:
- a) A single point of reference for setting out the key findings of the SHMA evidence undertaken to date;
 - b) An update on the implications of the latest available data, including the 2014 based Sub-National Household Projections, on the OAN; and
 - c) A review of the robustness of the latest ONS Mid-Year Estimates; It also
 - d) Takes into account inspector's reports and legal judgments relevant to SHMAs or the OAN;
 - e) Gives consideration to representations received to the DLPPS (Housing Growth section) in so far as these relate to the SHMA;
 - f) Takes account of feedback received by Welwyn Hatfield from visiting (serving and retired) planning inspectors;
 - g) Reviews the position on Housing Market Geography building on the evidence base of surrounding areas;
 - h) Reviews the position on the OANs of surrounding areas within the Welwyn Hatfield HMA (it does not calculate the OAN for any other area but it provides a context for strategic purposes);
 - i) Updates the market signals position;
 - j) Updates the housing type and mix analysis;
 - k) Review the need for specialist housing for older people and for student housing; and
 - l) Considers the implications of the latest demographic baseline of need on the affordable housing calculation.
 - m) Provides an updated OAN.
- 5.4 Key conclusions include:
- a) The official 2014-based sub-national population projections (SNPP) represent an appropriate and reasonable baseline of population growth for Welwyn Hatfield.
 - b) The 2014-based sub-national household projections (SNHP) provide **a new starting point**, with the number of households in Welwyn Hatfield expected to increase by 650 households per year, translating into **a need for 670 dwellings per annum** between 2013-2032, allowing for vacancy rates.
 - c) A demographic adjustment to allow for a return to higher levels of household formation amongst younger age groups, which has deteriorated in recent years, results **in a need for 721 dwellings per annum (an uplift from the starting point by 8%)**.
 - d) This demographic projection would also grow the labour force over the plan period, sufficient to support projected jobs growth.

³⁶ WHBC SHMA 2017 Update: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=12279&p=0>

- e) The need for affordable housing remains high (818 affordable homes annually in the borough to 2020, reducing to 602 affordable homes per annum thereafter);
- f) Starter Homes are likely to provide an alternative option for those currently renting in the private sector but are expected to remain unaffordable to a large number of households.
- g) A further upwards adjustment, representing **an additional 10% uplift**, to provide a supply-led response to a moderate worsening of market signals and to improve affordability is recommended. This suggests **a need for 793 dwellings per annum**.
- h) Drawing the analysis together indicates **an Objectively Assessed Need for 800 dwellings per annum**.
- i) This represents a **19% uplift** from the 'starting point'.
- j) The growth in older population will generate a demand for approximately 725 specialist housing units (as part of the OAN).
- k) Modelling indicates a separate need for 339 bed-spaces in communal care (Class C2) environments – additional to the OAN.
- l) The number of younger people (18-24) is projected to remain relatively stable in the first decade of the plan period. Any growth in the number of purpose built student accommodation, e.g. halls of residence, would offset the need to accommodate students in the private housing market such as within HMOs (although HMOs are also occupied by other shared adult households).

5.5 The Council's decision makers were advised of draft outputs arising from this work. Whilst the proposed housing target falls below the OAN, an acknowledged shortfall in infrastructure could not be resolved quickly and to delay the Plan until a further review had taken place would have significant implications for housing delivery in the borough and the ability for the Council to have an up to date Plan in place.

5.6 This is consistent with the Housing White Paper, which emphasizes the need to make sure that local planning authorities have an up-to-date plan in place so that communities are not disadvantaged by unplanned growth. Authorities that fail to do so are considered by the Government to be failing to provide the homes and facilities people need, and relying on ad-hoc speculative development which may not make the most of an area's potential. The White paper also proposes that Local Plans should be reviewed every five years and it was considered a sound approach to retain a target of 12,000 (recognizing the need for an early Plan Review) and to proceed to submit the Plan for examination.

The OAN across the wider housing market area

5.7 To understand the need for housing across the wider Welwyn Hatfield HMA, Welwyn Hatfield's SHMA evidence has at various stages, referenced the up to date published position on the SHMA evidence for surrounding areas. However, noting that no other SHMA places Welwyn Hatfield within its Housing Market Area, it is not appropriate for the Welwyn Hatfield SHMA to assess the OAN for each of these areas

5.8 As part of the Welwyn Hatfield SHMA Update 2017, each authority within the wider Welwyn Hatfield HMA was contacted to confirm that the latest published OAN position for each authority was appropriately captured. The SHMA Update 2017 identifies the different approaches taken in different studies in assessing the need for housing and the latest OAN.

Section 6: The implications of the Draft Local Plan housing target

6.1 Turley was also commissioned to prepare an additional paper ‘*Understanding the Implications of the Draft Housing Target 2017*’ to consider the implications for the scale of population, households and labour-force growth implied by the provision of 12,000 homes in the DLPPS. This was informed by demographic modelling by Edge Analytics.

6.2 The Council’s decision makers were advised of draft outputs arising from this work. (CHPP Report 16th March 2017)³⁷.

“4.26 As part of the 2017 SHMA Update, the Council’s specialist demographic and housing consultants have carried out a technical review of the implications of the proposed housing target. The role of the review is not to justify the target, as this has been determined through the plan-making process. The review serves to illustrate what the implications may be for the borough’s population, newly forming households, affordable housing and the availability of a labour-force to support jobs growth.

4.27 Analysis of the 2014-based household projections identifies a continuation of trends of reduced levels of household formation amongst younger people. Demographic modelling therefore examines the implications of continuing this trend (unadjusted) or making an adjustment to increase household formation for younger people. In this context, a housing target of 12,000 would result in population growth of between 19.8% and 21.8%, compared to the latest sub-national population projections of 23.5%. Both scenarios would exceed the national rate of population growth over the same period (13.6%).

4.28 The proposed housing target of 12,000 is likely to constrain population growth within younger age groups (the group most likely to migrate from one area to another) whereas population growth in older age groups is mainly driven by the natural ageing of the population.

4.29 This would result in more limited growth in the working age population (16-64) relative to the SNPP, which could constrain labour supply. 12,000 more homes however will provide the labour force to support between 15,730 and 17,360 additional jobs over the plan period although there is a modest risk that jobs growth may not be supported by the level of housing planned should household formation rates for younger households improve.

4.30 The planned approach to affordable housing would facilitate continuing historic completion rates, boosting more recent levels.”

6.3 Key conclusions from the published Paper ³⁸ indicate that the Local Plan housing target of 12,000 new homes will:

- **Grow the population by between 22,585 and 24,920 residents**, representing a proportionate **growth of circa 20 – 22%** which notably exceeds the rate of growth projected nationally over the same period (13%); and
- **Provide the labour force to support between 15,730 and 17,360 additional jobs over the plan period**, based on reasonable assumptions on labour-force

³⁷ CHPP 16 March 2017: <http://democracy.welhat.gov.uk/documents/g500/Public%20reports%20pack%2016th-Mar-2017%2019.30%20Cabinet%20Housing%20and%20Planning%20Panel.pdf?T=10>

³⁸ Understanding the Implications of the Draft Local Plan Housing target: <http://www.welhat.gov.uk/article/5501/Housing>

behaviour with a modest risk that the level of job growth underpinning the Local Plan may not be supported by the level of housing planned.

- Delivering the housing trajectory will boost recent levels of housing supply with the potential to have some positive impact in ensuring that market signals do not worsen further and support a continuing level of affordable-housing provision when compared to historical trends and an increase when compared to more recent completion rates.

Section 7: Accommodation needs of Gypsies and Travellers and Travelling Showpeople

- 7.1 The accommodation needs of Gypsies and Travellers and Travelling Showpeople were assessed in 2011. The report (published 2012)³⁹. This concluded that there was a (net) need for 54 additional pitches between 2011 and 2026. On the same basis, the LPC 2015 highlighted that demographic growth and household formation could give rise to the need for a further 17 pitches between 2026 and 2031. Since 2011, 3 permanent pitches had been completed in the borough and the Council has sought to identify a supply of specific, deliverable sites or specific developable sites or broad locations as part of the overall housing target.
- 7.2 The evidence base was reviewed in 2016⁴⁰ in light of the new National Planning Policy for Traveller Sites (PPTS) (August 2015). This deleted the words “*or permanently*” from the national planning definition of Gypsies and Travellers. The new definition reads:
- “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”*
- 7.3 In determining whether persons are Gypsies and Travellers for the purposes of planning policy, consideration should be given to the following issues, amongst other relevant matters:
- whether they previously led a nomadic habit of life;
 - the reasons for ceasing their nomadic habit of life;
 - whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.
- 7.4 However, whilst the PPTS definition seeks to focus on people who have ceased to travel *temporarily*, the wider policy still refers to the need to ensure that planning policies provide settled bases which reduce the need for long-distance travelling and the environmental damage caused by unauthorised encampments (13 d); reflect the fact that traditional lifestyles (whereby some travellers live and work from the same location) can contribute to sustainability (13 h) and secures the objective of reducing unauthorised developments and illegal encampments (4 f).
- 7.5 Further, under the Equalities Act 2010, the courts have determined that Romany Gypsies and Irish Travellers are protected against race discrimination as ethnic groups. There may be a cultural preference (and need) to live in a caravan for some households, regardless of whether they still intend to lead a nomadic habit of life.
- 7.6 The Council considers that this is an area where case law is likely to develop over time and for the purposes of the assessment in 2016, the Council took a pragmatic approach. For the purposes of a *nomadic habit of life*, those households who indicated that they had ceased to travel, had no intention of travelling again, or who now only travel to go on holiday/visit friends and family - were considered not to meet

³⁹ Welwyn Hatfield Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment **2011**: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=11319&p=0>

⁴⁰ Welwyn Hatfield Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment **2016**: <http://www.welhat.gov.uk/CHttpHandler.ashx?id=5212&p=0>

the PPTS definition. Those households (part or whole) that still travel for work or cultural reasons and intend to travel in the future were considered to meet the definition.

- 7.7 A limited number of exceptions were made to this approach, e.g. No information relating to future intentions to travel was available for those households on the HCC Waiting List for a pitch on a public site. Neither was this information available for those households living on private sites, without the benefit of planning permission (unauthorised developments). However, the relevant sections of this report explain why a (pragmatic) allowance has been made in each of these instances for future pitch requirements.
- 7.8 It was also very challenging to try and predict at this point in time whether households that may form in the longer term as a result of demographic growth (currently children/young teenagers) will choose to lead a nomadic habit of life and therefore meet the national planning definition. The relevant sections of the needs assessment report explain where a pitch allowance has been made for newly forming households and as part of the conclusion, it has been assumed that the need for pitches in the longer term is likely continue at similar rates as that assessed in the short-medium term (at a rate of 3.8 pitches per annum between 2026 and 2032).
- 7.9 On the basis of the information available at the time, the 2016 needs assessment concluded that there would be **a need for 61 additional pitches between 2016 and 2032**. Just over 60% of that assessed need (37 pitches) would be needed by 2021 to address the backlog which has seen expression in a persistent level of unauthorised development. This early provision could also assist a number of applicants on the waiting list (maintained by Hertfordshire County Council), a small number of households residing on the Transit Site at South Mimms (located outside the borough, in Hertsmere), a small number of concealed households, newly forming households; as well as addressing a need for visitor/transit provision.
- 7.10 Overall, it is considered that the Council took a positive approach to assessing need but it is recognised that the accommodation needs of Gypsies and Travellers and Travelling Showpeople will need to be reviewed in the future.

Section 8: Gypsy and Traveller development – land supply

- 8.1 The Council carried out a Call for Sites in 2013, working with the Gypsy and Traveller community to promote the event. A number of sites were promoted and these (and another site that was not promoted but had the benefit of temporary planning permission) were initially considered in the Gypsy and Traveller Land Availability assessment 2014⁴¹.
- 8.2 Detailed assessments were carried out. Out of a total of 7 sites, two sites were considered unsuitable for allocation in the Local Plan. Four sites were considered suitable and deliverable within 5 years but one was subsequently withdrawn. One site was considered suitable but only if an existing (non-compatible) use were to cease (this has now occurred) and a wider area were brought forward for development (see SDS1 below).
- 8.3 Those sites that were considered suitable were subsequently included within the Housing and Economic Land Availability Assessment 2016 were:
- GTLAA01 – Foxes Lane, Welham Green (12 additional pitches)
 - GTLAA03 – Marshmoor Lane, Welham Green (1 pitch)
 - GTLAA04 – Great North Road, Oaklands and Mardley Heath (6 additional pitches).
- 8.4 This resulted in a **total capacity of 19 pitches**, a shortfall of 42 pitches against the assessed and estimated need.
- 8.5 The Council has discussed this shortfall with promoters of Strategic Development Sites (SDS1/WGC4; SDS2/WGC5; SDS5/Hat11 and SDS6/Hat15), which are proposed for allocation in the Plan and of the need to deliver Gypsy and Traveller pitches as part of the overall housing mix associated with these large sites (divided on a proportionate basis to the overall level of housing proposed at each site). As a result, two further sites were considered in the HELAA and found suitable, available and achievable within the plan period. These were:
- GTLAA08 – north of Barbraville (4 pitches) – part off-site provision for site SDS5/Hat11; and
 - GTLAA09 – Coopers Green Lane (a site potentially large enough for up to 15 pitches but identified in the Draft Local Plan 2016 for 10 pitches as an off-site provision for site SDS6/Hat15).
- 8.6 The Draft Local Plan also seeks Gypsy and Traveller provision at a number of Strategic Development Sites:
- SDS5/Hat11 – NW Hatfield – 11 pitches;
 - SDS1/WGC4 – NE of Welwyn Garden City – 6 pitches; and
 - SDS2/WGC5 – SE of Welwyn Garden City – 11 pitches.
- 8.7 This would result in a **total of 61 pitches**, which would meet the current need in full.

⁴¹ WHBC Gypsy and Traveller Land Availability Assessment 2014:
<http://www.welhat.gov.uk/CHttpHandler.ashx?id=9623&p=0>

