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Dear Sir

## Welwyn Hatfield Local Plan

I am writing in response to your Interim Report and the timetable you have set out for the submission of further information and additional sites. The Council is now submitting further evidence to support the allocation of additional sites to the Local Plan. The Council is also continuing to work on the additional information requested by the end of December and for that reason I attach a progress report.

### 1. Representations

You will recall that the Council carried out a call-for-sites in 2019 and then consulted on potential changes to the Local Plan in February 2020. The Council received 771 representations to the consultation on potential sites, the Sustainability Appraisal and Habitats Regulations Assessment. The consultation was extended by a month as it was affected by the introduction of the first coronavirus lockdown at the end of March. **I now submit these representation and a summary of the issues raised to the examination.**

### 2. Update to Housing Land Supply

Full Council met on 23 November 2020 relating to the submission of additional sites to meet the full objective assessment of housing need (FOAHN). Updated evidence on completions between 1 April 2016 and 31 March 2020, outstanding commitments up to 30 September 2020 and windfall development was taken into account as part of their considerations. The Council will be publishing a detailed breakdown of the figures on its website next month and is happy to submit this to the examination should it be required.

**Table 1 Updated Housing Land Supply**

Supply	Dwellings
Completions 2016-2020	2,121
Commitments (excluding allocations or proposed allocations)	961
Windfall	1,402
Small sites	15
Total	4,499

You will note that the windfall allowance has been slightly increased from 1,315 dwellings identified in the Submitted Plan, but that it is significantly lower than the 2,249 dwellings identified in the Council’s consultation on potential changes to the Local Plan. The 2,249 dwellings represented a continuation of current trends as at December 2019. The Council recognises that once the Local Plan is adopted these trends are unlikely to remain at that level, but considers that the allowance needs to be higher than set out in the Submitted Plan because of the impact of the introduction of changes to permitted development rights. The Council will provide a more detailed breakdown of this in the updated housing trajectory and will provide a paper explaining the analysis which has led to this change.

### 3. Changes in Capacity

The Council has also reviewed opportunities to increase the number of dwellings on sites already proposed for allocation. In some cases these proposals have already been debated at examination hearing sessions, some result from representations to the proposed changes consultation and schemes being promoted through pre-application discussions and in other cases it is as a consequence of further masterplanning work.

Appendix 1 to this letter provides further detail on sites. Table A2 sets out the changes to the capacity of allocations as set out in the Submitted Local Plan, including sites which you have identified should be reduced or should not go forward at all and the expansion of SDS1 (WGC4/4A) North East Welwyn Garden City onto land to its north, which would increase its capacity from 650 to 815 dwellings. This all results in a net additional 679 dwellings. The allocations in the Submitted Plan totalled 8,029 dwellings and the revised total for the submitted allocations is therefore **8,708 dwellings**.

Ongoing work requested by the Inspector on allocations in the Submitted Plan would indicate that there is potential for further increases on allocated sites and potential extensions which could provide an additional 680 dwellings. However this overall total is not supported by the Council in the light of the latest household projections and the evidence on housing need. These figures are set out in Table A5 of the Appendix to this letter.

**Table 2 Changes in capacity on draft allocations**

Supply	Dwellings
Completions 2016-2020	2,121
Commitments (excluding allocations or proposed allocations)	961
Windfall	1,402
Small sites	15
Changes to submitted allocations from Table A2	8,029 + 679
Potential additional capacity from Table A5	680
Total	13,887

### 4. Spatial Strategy

The Council has carefully considered your advice on the location and distribution of additional sites set out in the Interim Report. The Council’s strategy continues to be one of minimising harm to the green belt unless there are clear strategic benefits for a particular site coming forward such as in the case of SDS5 North West Hatfield. Its decisions are

now better informed by the Green Belt Stage 3 Study. The Settlement Strategy set out in Policy SP3 identifies a hierarchy of settlements based on their sustainability and identifies the appropriate scale of growth within that hierarchy. In identifying where growth should go the Council has sought to maintain this strategy and noted your comments on which villages might be suitable locations for additional growth.

The Site Selection Background Paper 2019 updated the evidence from the 2016 paper taking account of new evidence and the availability of additional sites. It reviewed all sites found suitable in the Housing & Employment Land Availability Assessment (HELAA) and considered strategic benefits, cumulative impacts as well as the individual sustainability of the sites and the harm to the Green Belt. **This evidence along with the HELAA Addendum 2019 is now submitted to the examination.** However it should be noted that since its preparation, the 2018-based household projections have been published, which indicate a material change has taken place and therefore the context for exceptional circumstances has changed. Its recommendations are therefore out-of-date.

In reaching their decision Members have sought to minimise harm to the green belt and to avoid the coalescence of settlements. Sites have been selected in accordance with the settlement hierarchy. Account has also been taken of your comments on the spatial distribution. Table A3 in Appendix A sets out the split between urban and Green Belt.

#### a. Brownfield opportunities in sustainable locations

All of the urban sites are previously developed land. All bar one site lies within the two towns of Welwyn Garden City and Hatfield. This source delivers an additional **1,358 dwellings**. 389 of these dwellings lie within a town or neighbourhood centre but none would result in the loss of any retail floorspace. Two sites lie close to the University of Hertfordshire College Lane campus. The remaining 60% of dwellings lie on land which is designated or proposed for designation as employment land in sustainable locations close to services and facilities and public transport.

The strategy does therefore impact on the supply of employment land. This is set out in the Table 3 below. It indicates a floorspace supply of 36,750 sqm for the plan period and it should be noted that 40,000 sqm of this supply comes from Marshmoor business park.

The Council could instead consider retaining this employment land and identifying Marshmoor for residential use. However some of these sites already have prior notification approval or planning permission for residential development, whilst others are progressing planning applications. In the absence of a five year housing land supply the Council would be unlikely to be successful in defending their loss on appeal. Furthermore these sites can deliver development at a higher density than Marshmoor business park and therefore make more efficient use of land.

**Table 3: Employment Land Supply 2020**

Supply	Floorspace sqm
Completions 2016/17 – 2019/20	-24,418
Commitments (excluding Local Plan sites)	37,886
Windfall allowance	-29,040
Draft Local Plan sites + new planning permissions	58,240
Vacant sites, including Chequersfield	9,200
Proposed changes sites	-15,118
<b>Total</b>	<b>36,750</b>

## **b. Urban Extensions**

Section 3 has already referred to the opportunity for an urban extension to Welwyn Garden City as an expansion of Site SDS1 North East Welwyn Garden City.

No suitable opportunities were identified in the Site Selection Background Paper 2019 for additional urban extensions around Hatfield.

Land adjoining Potters Bar was promoted through the call-for-sites in 2019. At the time of the 2019 HELAA assessment insufficient evidence had been submitted to the Council to demonstrate its deliverability. However Members considered the location offered a sustainable opportunity for development and asked officers to pursue it as an option. The promoter of the site subsequently commissioned additional work and submitted sufficient evidence to demonstrate the deliverability of a site for 700 dwellings. The details of this proposals have been shared with Hertsmere Borough Council. Hertfordshire County Council as the local highway authority have now confirmed that the access issues can be resolved, but only with the loss of a wildlife site. Whilst it is considered that the promoter has a large enough adjoining landholding to deliver net biodiversity gain, there may also be a better solution by working with the adjoining local planning authority, where an adjoining site has been promoted to the south of Potters Bar. Hertsmere is at Regulation 18 stage and although there is no certainty that this site would be brought forward, it affords the opportunity to consider opportunities to expand Potters Bar to the east and south and potentially deliver new primary and secondary education facilities. The Council therefore considered it should be identified as safeguarded land / broad location. If you consider it is needed to meet the need for housing in the last five years of the plan, it could be identified for early release through a review of the plan or as a joint area action plan to be prepared with a neighbouring authority. **An updated HELAA assessment of the location has been prepared and is submitted to the examination along with a site plan indicating the extent of land to be considered for safeguarding.** There is also potential to extend the area southwards to the M25 if you consider it appropriate.

## **c. Village Sites**

Policy SP3 identifies large and small excluded settlements as a secondary focus for development. Digswell, Welham Green and Brookmans Park are served by railway stations and Little Heath is an extension of Potters Bar also served by a railway station.

In your Interim Report you identify Welham Green and Digswell as potential locations for further growth. The Council is proposing three additional sites at WeG1, WeG3a and WeG10 in Welham Green on land which has no more than moderate harm to the green belt. **This results in additional capacity of 204 dwellings.**

Unfortunately there are no suitable opportunities for allocating sites in Digswell.

There are also no additional opportunities in Oaklands and Mardley Heath.

Whilst suitable sites were identified in Welwyn village these were all on land which would result in either 'moderate to high' harm or 'high' harm to the green belt. The Welwyn sites would all require improvements to the highway network, involving a significant change in the character of rural roads in the area. In addition the delivery of Wel1, Wel2, Wel6 and Wel15 would require the construction of a new bridge over the river and the loss of a small

part of the local nature reserve to facilitate these highway improvements. The bridge and access road lie in flood zone 3. Over-abstraction of the River Mimram has resulted in proposals to cease pumping at Fulling Mill, which are under consideration. The consequences for the extent of the flood plain are unknown. On balance the harm to the green belt is not outweighed by the need for housing in this instance, when considered in combination with the impact on the nature reserve and the uncertainty relating to flooding. It should also be noted that there have been significantly more completions (+156) in Welwyn village during the plan period than any other village in the borough.

Two additional opportunities on land which would result in no more than moderate harm have been identified at BrP1 Bell Bar (which is an extension of Brookmans Park) and LHe4/5 Little Heath. Other opportunities around these villages have been rejected because of their harm to the green belt or because of coalescence. **This results in additional capacity of 140 dwellings.**

Opportunities for development in washed-over settlements (apart from Bell Bar) have been rejected because they lack services and facilities.

The details of the sites are set out in the attached Appendix in Table A3.

**Table 4 Additional Sites**

Supply	Dwellings
Completions 2016-2020	2,121
Commitments (excluding allocations or proposed allocations)	961
Windfall	1,402
Small sites	15
Changes to submitted allocations from Table A2	8,029 + 679
Potential additional capacity from Table A5	680
Additional sites capacity from Table A3	1,702
Sub-Total	15,589
Safeguarded land / Broad location	700
Total	16,289

## 5. Meeting the FOAHN and Exceptional Circumstances

The Council has submitted evidence on the implications of the 2018-based sub-national population and household projections on the calculation of the Objective Assessment of Need (OAN).

The Council has now reviewed the evidence and in that context no longer considers there are exceptional circumstance to release sufficient land to deliver 16,000 dwellings. The Council has written to you requesting a hearing session on this matter and setting out its view that the OAN is 690 dwelling per year.

In that context the Council consider that when the Calverton Test is applied, the scale of the need no longer justifies the release of the high harm sites from the green belt or the creation of a new settlement at Symondshyde. The high harm sites are HS22 land west of Brookmans Park, HS24 land south of Hawkshead Road, HS29 Wells Farm, Northaw Road Cuffley, HS30 land north of Northaw Road East and HS33 Barbaraville, Hertford Road.

**Table 5: Sites proposed for removal**

Supply	Dwellings
Completions 2016-2020	2,121
Commitments (excluding allocations or proposed allocations)	961
Windfall	1,402
Small sites	15
Changes to submitted allocations from Table A2	8,029 + 679
Potential additional capacity from Table A5	680
Additional sites capacity from Table A3	1,702
Safeguarded land / Broad location at PB1	700
Sites no longer justified by exceptional circumstances from Table A5	(1,632 + 680)
Total	13,977

Appendix 2 to this letter sets out a schedule of the evidence submitted in support of these additional sites.

I look forward to debating this evidence at future examination hearing sessions.

Yours sincerely



Colin Haigh  
Head of Planning