

MADDOX PLANNING

LONDON & MANCHESTER

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Louise St John Howe
Programme Officer

11/01/2021

FULL OBJECTIVELY ASSESSED HOUSING NEED: ARLINGTON BUSINESS PARKS GP LIMITED ('ARLINGTON')/ LAND WEST OF HATFIELD (HAT2)

Dear Louise,

This letter is submitted in response to the additional documents uploaded to the Examination pages of the Welwyn Hatfield Examination website and provides comments, as requested by the Inspector. This letter particularly focuses on the documents submitted by the Council setting out its latest Full Objectively Assessed Housing Need 'FOAHN' (EX215) and Inspector's subsequent reply (EX216).

EX215 provides an update to the Inspector on what the Council determines to be its precise Objectively Assessed Need 'OAN' for the plan period. This is concluded to be 690 homes per year over the period 2016-2036.

Arlington does not agree with the conclusion reached by the Council on this lower OAN, which is below what it has previously made reference to during the Examination of the Local Plan. Indeed, as the Inspector notes in EX215, the Council provided a revised position on the FOAHN at EX203 where it concluded that the FOAHN for Welwyn Hatfield should now fall within a range between 715 and 800 dwellings per annum for a period up to 2032. EX203 was submitted in September 2020 and there has clearly not been any seismic shift in housing delivery over the proceeding months to justify a reduced OAN below what the Council already reported.

Arlington has submitted numerous representations throughout the Local Plan Examination in relation to the Council's household projections and why the OAN referenced in EX203 in particular, was considered too low. This is largely on the basis that the figure did not seek to significantly boost the supply of housing as advocated by the Government. Indeed, the Inspector has also previously set out that, in his view, *'a fundamentally lower housing requirement would not support the national objective to boost the supply of housing, which is as relevant in Welwyn-Hatfield as anywhere. It would also fail to address housing affordability issues, affordable housing need and the housing impediments to the successful economic growth of the Borough'* (Para 130, EX212).

The Inspector will also note that the current standard methodology calculates the housing requirement for Welwyn Hatfield to be 875 dwellings per annum and this is very likely to be the method for establishing the requirement in the next Local Plan review (Source: latest MHCLG guidance, 2020). This is very pertinent given

the Council's consistent under-delivery of housing as shown in the predicted 2020 housing delivery test results. These results show that the presumption in favour of sustainable development will apply as housing delivery will have fallen below the 75% threshold. This further highlights the need to release further land for the delivery of housing within the Borough.

We consequently agree with the Inspector that the FOAHN which should be considered to be before the Examination is 16,000 and *'not whatever alternative figure the Council would prefer it to be (EX216).'* However, it is clear that the Council has not identified sufficient sites to meet this FOAHN, which was advised by the Inspector within his preliminary conclusions (Para 18, EX212). We, therefore, recommend that the Plan is withdrawn from the Examination, so that further work can be undertaken to identify the additional sites.

Yours sincerely



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