

## WELWYN HATFIELD LOCAL PLAN EXAMINATION

### Consultation on the Council's proposed FOAHN (Dec 2020 – Jan 2021)

#### Response on behalf of Tarmac Trading Ltd.

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1. We welcome the opportunity to respond to this consultation. For the Plan to meet the soundness test of being "positively prepared" (para. 182 of the 2012 NPPF<sup>1</sup>), it is crucial that the FOAHN (Full Objectively Assessed Housing Need) is set at the appropriate level.
2. As the Inspector pointed out in EX216, "the FOAHN that is currently before the Examination is 16,000" dwellings (800 dpa). We strongly disagree with the Council's proposal to reduce the FOAHN to 13,800 dwellings (690 dpa).
3. In putting forward that proposal, the Council has given too much weight to the Government's 2018-based household projections for the Borough. Although the relevant PPG (in section 2a-016-20150227) advises that "local needs assessments should be informed by the latest available information" (emphasis added), it goes on to stress that "this does not automatically mean that housing assessments are rendered outdated every time new projections are issued".
4. Turley drew attention to this important PPG advice in its report to the Council (EX218), noting that the implication of that advice is that "the option remains open to the Council to justifiably retain the previously evidenced OAN" (para. 26; emphasis added). Although Turley went on to refer to the "shifting demographics" that "suggest a downward trend with regards to the need for new housing to which the Council can reasonably reference in arriving at their judgement", Turley advised that this "should continue to be considered by the Council in the context of wider benefits associated with the scale of affordable housing which could be delivered by a higher housing requirement" (*ibid.*).
5. In this regard, the Inspector noted in EX212 that housing affordability has worsened in the Borough over the past decade (para. 33), concluding that "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 [and] affordable housing need" (para. 130). The Inspector added that a "fundamentally lower housing requirement" would "also fail to address ... the housing impediments to the successful economic growth of the Borough" (para. 130) and "would be likely to result in increased inward commuting, which ... would not be consistent with sustainable development" (para. 131; see also paras. 28-33, 46 and 128-129 of EX212). The Inspector reiterated that particular soundness concern more recently in his 22<sup>nd</sup> December reply (EX220; para. 3) to the Council's 30<sup>th</sup> November 2020 submissions (EX219).
6. In a similar vein, Council officers advised the Council's Cabinet Planning & Parking Panel (CPPP) on 17<sup>th</sup> November 2020 that: "There is still a strong argument that the 2014-based household projections provide a suitable starting point rather than the more recent versions", adding that "the government's standard method requires the use of the 2014-based projections even though the two more recent sets of projections [the 2016- and the 2018-based projections] exist" (Appendix E to officers' report to the 17<sup>th</sup> November CPPP; emphasis added).

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<sup>1</sup> To meet the soundness test of being "positively prepared", "the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development" (para. 182 of the 2012 NPPF; emphasis added)

7. Although the FOAHN for this Plan is not set by the Government's standard method (because the Plan is being examined under the 2012 NPPF), the FOAHN arising from that standard method (17,500 dwellings or 875 dpa) is far from an "irrelevant" consideration, as the Inspector described it (EX216). Even the FOAHN currently before the Examination of 16,000 dwellings is materially below that 'true' FOAHN, while the Council's proposed FOAHN of 13,800 dwellings would be "fundamentally" below that level (see para. 5 above), exacerbating housing affordability pressures and unsustainable inward commuting to the Borough as the Inspector highlighted in EX212 and EX220 (*ibid.*).
8. Council officers went on in Appendix E to their report to the Council's CPPP on 17<sup>th</sup> November 2020 to state that "An examination of other 'transition' examinations being considered against the same guidance as Welwyn Hatfield indicates that updating to take account of the 2018-based projections has generally been avoided". In that regard, it is noteworthy that the outcome of the Government's recent review of its standard method, which concluded in December 2020, has been to reiterate reliance on the 2014-based projections in preference to both the 2016- and the 2018-based forecasts. That very recent Government reiteration, which post-dates the Council's consideration of the matter in November 2020, further weakens the case for the reduction of the FOAHN that the Council has proposed.
9. Although it might be argued that the Council's reliance on the 2018-based projections is moderated by its application of a 21% market uplift, that percentage should be compared to the 40% uplift that would arise if the standard method were to be applied. Considered against that backdrop, the 21% market uplift applied by the Council is insufficient to address the acute housing affordability pressures within the Borough.
10. For all these reasons, it is not appropriate to reduce the FOAHN below the 16,000 dwellings currently before the Examination, while it is even less appropriate to undercut the 14,300 figure recommended to the Council by Turley (and indeed, Turley's broader advice noted at paragraph 4 above must not be overlooked).
11. Not only is the Council's proposed FOAHN of 13,800 dwellings inappropriately low, but its proposed supply of 13,277 dwellings is grossly insufficient. That undersupply, even relative to a reduced FOAHN, is not justified by the evidence base for the Plan. Sufficient suitable sites exist to meet the FOAHN, as the Council's Sustainability Appraisal amply demonstrates.
12. The detail surrounding the Council's proposed housing supply is for future consultations and Examination hearings, but the BGS allocation should certainly be retained at its full 1,300 dwellings, enabling the residual 700 dwellings to be accommodated in a sustainable location at Welwyn Garden City itself (as opposed to more rural parts of the Borough) and securing the delivery of the proposed new on-site primary school and neighbourhood centre, as well as the Council's planned Green Corridor and the County Council's proposed A414 Strategy.
13. In relation to that County Council proposal, retention of the full BGS allocation would have the significant benefit of securing the delivery of key sustainable transport infrastructure, encompassing strategic pedestrian and cycle linkages (including to Hatfield, as well as to Hertford via the Cole Green Way), in addition to a direct connection with the proposed Mass Rapid Transit (MRT) route along the A414 linking the county's major towns. In this way, retention of the full BGS allocation would directly address the Inspector's soundness concern about the Plan's strategy failing to stem further increases in car-borne commuting both into and within the Borough (see para. 5 above).
14. Furthermore, as we demonstrated in our response to EX212 and indeed as Council officers noted in their report to the CPPP on 17<sup>th</sup> November (at paras. 2.12 and 4.105, and on p.41 within Appendix A to that report), the Inspector's interim concerns about the impact of the full BGS allocation on the openness of the remaining Green Belt to the south of the A414 can be fully addressed by the proposed combination of early landscape screening and later phasing of this part of the BGS development.

15. We look forward to participating in any further hearing that is arranged to debate the Council's proposed FOAHN, as well as to engaging in future consultations and hearings concerning the Council's proposed housing supply, with the aim of contributing to an expeditious completion of the Examination and a timely adoption of a sound Plan.