

From: roryconnorfrics  
Subject: Welwyn & Hatfield Calculation of FOAN.  
Date: 7 January 2021 at 13:42:53 GMT  
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Louise

Following the announcement by MHCLG on 4th January that the 2014 figures will remain the basis of the calculation of the Council's housing need it now appears that the Turley submissions will now be rendered largely academic. In view of this I wonder if I might be permitted to submit the enclosed representation on the overriding importance of Welwyn & Hatfield Council satisfying its full OAN by finding suitable sustainable sites rather than trying to reduce the FOAN to fit the "alleged" available sites.

I have reduced my submissions to bullet points for the sake of brevity.

Sir

1) The Council's draft local plan passed at full council on 23rd November 2020 offered a target of 13,277 houses which included a fairly generous "windfall" figure for unexpected gains. However, this figure is clearly questionable as it does not take account the other side of the coin i.e. losses resulting from unexpected non delivery (lower density on planning consent, net demolitions, ownership policy changes etc.). In my view this would render the plan not sound on the grounds that it is negative (i.e. the FOAN is not met).

2) In its site selection the Council elected to create a totally artificial basis of selection. Sites were graded into three categories "more favourable, finely balanced or less favourable". In my view this is an inappropriate methodology since it implies choice based on preference rather than the planning guidelines set out in NPPF. Indeed at a public exhibition staged by the Council in 2015 only sites selected as "more favourable" under this criteria were shown to the public. Sites that failed this arbitrary test as "finely balanced or less favourable" were kept away from the public view with only site references referred to in an obscure document's appendix. So relevant alternative sites were not evaluated. Nowhere in NPPF is a selection criteria like that advocated. Everything is purely planning based as it should be. Again I would argue this leads to the plan being not sound on the grounds it cannot be justified.

3) It is clear many suitable sites have been overlooked as a result of the inappropriate basis of selection referred to in 2 above. This results in an incomplete database and the inability to select a range of options when calculating the FOAN since alternatives cannot be compared with one another. Also environmental options are being ignored such as sites close to railway stations and basic Green Belt

equation of evaluating harm against good is not being applied rationally. I would venture to suggest this is impeding the formulation of the FOAN. This cannot be justified.

4) There is little evidence in the current plan of any sustainable pattern of development. Housing numbers has been loaded onto the towns and higher rise tower blocks (long since abandoned by planners) advocated. This will stress out town facilities and does little to balance the under provision in some of the rural areas where small and large villages seem to be protected. This suggests that distribution of housing in the plan in its current form is unbalanced and therefore the plan is rendered not sound.

5) The Council has been engaged on its local plan for over ten years. It is unreasonable that such an exercise should take so long. The fact is that the twin national policy objectives of boosting house building and improving affordability is thwarted by local authority delay and intransigence and that it should become a housing crisis is mainly due to local authorities dragging their feet when dealing with local plans, planning applications and appeals.

6) The golden thread of the NPPF is defined as sustainability which contains three elements economic, social and the environmental. None of these have been advanced by Welwyn & Hatfield Council for ten years since we have no plan. We are in the midst of a combination of crises pandemic, major trade adjustments, plunging economic activity with mounting public and private debt. Stimulation of our economy through national planning objectives is vital for our recovery – as far as Welwyn & Hatfield are concerned they need to put their local plan into place as a matter of urgency not keep going round and round in circles wasting time and money.

I am sorry if I occasionally stray off point but I maintain all these factors are seriously interfering with the calculation of a proper FOAN for Welwyn & Hatfield Council. If the Council's figure of 13,277 is agreed I suspect delivery would be around 12,000 (this is just a guess) exacerbating current under delivery. I believe the appropriate FOAN for this Council to lay between a minimum of 16,000 (800 homes per annum) and 17,500 (875 homes per annum) if we are to have any chance of meeting national policy objectives.

Professional etiquette requires that I state that these views are not necessarily those of the RICS although I believe my statements to be factually correct in planning terms.

Kind regards

M.Connor FRICS