
**Examination of the Regulation 19
Submission Welwyn Hatfield Local Plan
(to 2036)**

Response to:

EX221 – WHBC Windfall Update

Prepared by:

**Woolf Bond Planning LLP for Magenta
Planning**

On behalf of:

**Sustainable Development Solutions Ltd
and
Taylor Wimpey (North Thames) UK Ltd**

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Introduction

- 1.1. This Statement has been prepared by Woolf Bond Planning LLP for Magenta Planning on behalf of Sustainable Development Solutions Ltd (“SDS”) and Taylor Wimpey (North Thames) UK Ltd (“TW”).
- 1.2. In setting out our response to EX221, we continue to rely upon (i) the content of the detailed representations submitted on behalf of SDS in response to the Regulation 19 consultation in Aug/Sept 2016, (ii) representations by SDS and TW upon the Stage 3 Green Belt consultation (Sep 2018), (iii) representations upon the Council’s consultation upon Proposed Changes to the submission Local Plan (Feb 2020), (iv) Statements submitted in April 2020 for the Cuffley hearing Session; and (v) the Statement prepared by Pegasus upon EX223 (WHBC Green Belt Boundaries).

Housing Delivery: Windfalls

- 1.3. The Welwyn Hatfield District Local Plan was adopted in 2005 and Policy H1 sets out the approach to meeting the housing requirement in the period 1991 to 2011. The supporting text at paragraph 9.14 of the adopted Local Plan confirms that the housing requirement is to be met by sites within the urban areas, including through windfalls. As such, the Local Plan did not provide for a review of the Green Belt.
- 1.4. Given the restrictive approach to meeting development needs through sites within the urban areas and the reliance on windfalls to meet the housing need in the period to 2011, it is unsurprising that windfalls have provided the majority of the completions.
- 1.5. The restraint to growth imposed by tightly defined Green Belt boundaries has served to constrain the number of completions achieved in the last 10+ years. This is particularly the case beyond 2011 (the end date of the 2005 Local Plan).
- 1.6. The reliance upon completions from windfall sites has resulted in acute affordability issues within the Borough.

- 1.7. Completions have failed to deliver the required level of new homes, which position is made clear in the HDT results (Jan 2021) with Welwyn Hatfield only achieving a Delivery Test result of 63%. As such, the presumption is engaged.
- 1.8. As set out in EX224, and on the application of the correct housing requirement, the Council is unable to demonstrate a five year supply of deliverable housing land. This is the case regardless of applying the Liverpool or Sedgefield approach to addressing the accrued shortfall.
- 1.9. The Council is unable to demonstrate a five year supply of deliverable housing land even allowing for their over-reliance on delivery from windfall sites.
- 1.10. Their projections of windfall completions is not underpinned by a robust data set that is otherwise necessary in order for the Council to substantiate its position.
- 1.11. By artificially increasing the anticipated rate of windfall completions, this suppresses the need to provide for Green Belt releases. Moreover, continued reliance on windfall sites will, by the very nature of the sites that become available within the urban areas, largely provide for smaller dwelling types on higher density schemes. This approach fails to address the qualitative need for an appropriate mix of house types, including the need for homes for families comprising 3-4 beds).
- 1.12. The continued reliance upon windfall sites also impacts the likely delivery of affordable homes that could otherwise be provided on greenfield sites, including those to be released from the Green Belt.

Summary

- 1.13. As such, the Local Plan needs to take a more realistic approach to the reliance from windfall sites, whilst retaining the draft site allocations proposed to be released from the Green Belt, including at HS29 (Cuf12). Such release clearly satisfy the Calverton test; and are necessary to ensure an adequate supply of deliverable housing land.
