

MADDOX PLANNING

LONDON & MANCHESTER

0845 121 1706

Louise St John Howe
Programme Officer

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**HOUSING LAND SUPPLY UPDATE AND GREEN BELT BOUNDARIES: 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 housing land supply update (EX224) and commentary on Green Belt boundaries (EX226).

HOUSING LAND SUPPLY UPDATE

EX224 provides an update to the Inspector on what the Council determines to be its updated housing land supply position when assessed against its annual housing target. It is noted that within the document the Council outlines that the Local Plan delivers a 5.1 years supply of housing land when assessed against a target of 668 dwellings per annum (Table 1). From reviewing the associated trajectory, it is apparent that in reaching this land supply figure, the Council assumes that a number of allocated sites will deliver in excess of 250 dwellings per annum, which is not considered realistic. When these over ambitious delivery rates are adjusted to even 150 dwellings per annum, it is clear that the Council would not be able to demonstrate a 5 year housing land supply against a target of 668 dwellings per year.

More pertinently, the annual housing target (668) is below the 690 dwellings per annum the Council advised the Inspector to be its Full Objectively Assessed Housing Need 'FOAHN' for the plan period (EX215). If the target of 690 dwellings per annum was to be considered as the most appropriate housing target, it is clearly evident that a five years supply of housing land could not be demonstrated as the position would be worse than that mentioned above.

As per our recent representations, we 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)*. This subsequently results in a requirement for 800 dwellings per year. The Council confirms within EX224 that *"against a housing target of 800 dwellings per year, even continuing to incorporate the sites recommended to you for removal, there is a shortage of almost 900 dwellings against the five year supply*

requirement.” This will be further exacerbated when the Council updates its trajectory in line with realistic delivery rates as we have discussed above.

The Council must identify further sites to come forward for allocation to ensure that it can maintain a five years housing land supply throughout the plan period as it is clearly evident that this is not currently being met.

GREEN BELT BOUNDARIES

EX226 provides a note on HAT1 in the context of Green Belt approach. At paragraph 8, the Council discusses the settlement strategy and outlines that “*Hatfield is below only Welwyn Garden City in the plan’s settlement hierarchy. It is therefore important that, subject to other issues, a significant proportion of the borough’s development is in and around the town in order to support its continued sustainable development (our emphasis).*” GBR3 concludes that areas of ‘very high’ harm are most essential to retain. EX226 confirms that HAT1 includes land which is identified to have ‘very high’ harm, whilst the allocation as a whole has ‘high’ harm.

Our longstanding representations have demonstrated that there are additional sites in and around Hatfield, such as HAT2, which will assist and support its continued sustainable development. In addition, it is pertinent to reiterate that HAT2 has a lower harm rating, as set out in GBR3 Figure 7.1.

It is clear that additional sites will need to come forward for allocation and we are of the view that there are sufficient sites in the low to moderate-high rating to meet housing needs and that in reviewing sites with an equal moderate-high rating first consideration should be given to those sites that maintain the existing settlement pattern; are well served by public transport and can demonstrate compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. In all these considerations, HAT2 compares favourably over other sites being promoted around Hatfield.

DELIVERY OF HAT2

On 12 March 2020, the Inspector requested a statement of fact on the delivery of Hat 2, which he wanted to be prepared by the Council in collaboration with Arlington Business Parks GP Limited to ensure the facts of delivery are correct. The statement of fact was submitted to the Inspector in June 2020 and we await comments from the Inspector on this document.

Yours sincerely

Matt Hill
Associate Director

t: 0845 121 1706
m: 07890 501 722
e: matt@maddoxassociates.co.uk
