



**WELWYN  
HATFIELD**

Christopher Dale

Head of Planning

Reply to: address as below

Melvyn Middleton

10 August 2022

Planning Inspectorate

c/o Programme Officer

[louise@poservices.co.uk](mailto:louise@poservices.co.uk)

Dear Sir,

### **Welwyn Hatfield Local Plan**

I am writing in response to your letters dated 16th February, 5th April and 30th June 2022. The Council has carefully considered the advice in your letters and the additional sites available that could be submitted to the Examination.

The Council has also considered the Government's stated intention to strengthen the protection for the Green Belt set out in the Levelling-up and Regeneration Bill and the accompanying policy note. The Council is mindful of the fact that once land is removed from the Green Belt it cannot be put back even if there is a change in methodology relating to the calculation of housing need or the context which led to its release is no longer relevant. Exceptional circumstances must exist to justify changes to Green Belt boundaries and the case needs to be a strong one where the harm to the Green Belt would be high as a consequence. The authority must be able to demonstrate that there are no other reasonable alternatives to meet the need for development.

The Council has also noted the first set of results from the 2021 Census which once again indicates that the Sub National population and household projections overestimate the figures for Welwyn Hatfield. The population is recorded as 119,900 in contrast to the 2018 based principal estimate for 2021 of 125,266 and the 2018 alternative based variant of 127,064. ONS are still reviewing their assumptions relating to student migration and the ONS data on migration will not be published until later this year meaning that it is difficult at this stage to draw firm conclusions. In all probability the next set of projections will result in a lower demographic starting point and as a consequence the Full Objective Assessment of Housing Need (FOAHN) of 15,200 dwellings will represent a much higher uplift than 63% which applied to the Alternative variant baseline household growth projection and 146% over the Principal baseline household projection.

**Table 1 2018 Household based projections and adjustments**

| 2016-36   | 2018-based PRINCIPAL projection | 2018-based ALTERNATIVE internal migration variant |
|---|---------------------------------|---|
| Average Annual Household Growth   | 309                             | 466   |
| Unadjusted demographic position (with 2014-based household headship rate applied) - Dwellings | 358                             | 525   |
| Adjusted demographic position (to account for younger adult household formation) - Dwellings  | 419                             | 593   |
| % uplift of 760 on Average annual household growth  | 146%                            | 63%   |
| % uplift of 760 on Adjusted demographic position  | 81%                             | 28%   |

The FOAHN is in part linked to the employment strategy set out in the draft Local Plan. To date the borough has seen an overall net loss of employment land in the main due to permitted development rights and continuing store closures in the town centres with both Next and Marks and Spencer having now closed their stores in Welwyn Garden City which now lie vacant. Whilst the Council has now introduced an Article 4 Direction the Department for Levelling-up, Housing and Communities has asked for further justification for their boundaries and this might result in a change to the boundaries of the Direction. There are real concerns that the projected increases in jobs, particularly in retailing, will not occur on the scale envisaged in the Council's evidence base.

The Council has updated its monitoring of completions and commitments. 2,731 dwellings have now been completed between 1<sup>st</sup> April 2016 and 31<sup>st</sup> March 2022 which equates to an annual average of just over 455 dwellings. This represents 60% of the 760 dwellings per annum (dpa) target for that period and results in a shortfall of 1,829 dwellings. The residual requirement incorporating that shortfall results in a requirement for 12,469 dwellings for the remainder of the Plan period and 9,302 dwellings for the first 10 years.

**Table 2a Residual requirement for the Plan period (Year 1 as 2022/23)**

| Housing Requirement | Completions 16/17 - 21/22 | Years 1-5 (22/23-26/27) | Years 6-10 (27/28-31/32) | Years 11-14 (32/33-35/36) | Total residual requirement | Total Years 1-10 |
|---------------------|---------------------------|-------------------------|--------------------------|---------------------------|----------------------------|------------------|
| Target              |                           | 4,453                   | 4,453                    | 3,563                     |                            |                  |
| Buffer (20%)        |                           | 890.6                   | -494.8                   | -395.8                    |                            |                  |
| Total Required      | 2,731                     | 5,343.6                 | 3,958.2                  | 3,167.2                   | 12,469                     | 9,301.8          |

The residual requirement has also been presented below based on adopting in 2023 (Table 2b), with year 1 being 2023/24. Between 2016 and 2023 forecast completions amount to 3,344 dwellings (2,731 completions over 2016-22 plus forecast completions of 613 dwellings in 2022/23). Against the requirement of 5,320 dwellings for this period (760x7 years), this results in an expected shortfall of 1,976 dwellings. The residual requirement incorporating this shortfall is 11,856 dwellings for the remainder of the Plan period (1-13) and 9,462 dwellings for the first 10 years.

**Table 2b Residual requirement for the Plan period (Year 1 as 2023/24)**

| Housing Requirement         | Completions 16/17–21/22 | Forecast Completions 2022/23 | Years 1-5 (23/24-27/28) | Years 6-10 (28/29-32/33) | Years 11-13 (33/34 - 35/36) | Total residual requirement | Total Years 1-10 |
|-----------------------------|-------------------------|------------------------------|-------------------------|--------------------------|-----------------------------|----------------------------|------------------|
| Target (includes shortfall) |                         |                              | 4,560                   | 4,560                    | 2,736                       |                            |                  |
| Buffer (20%)                |                         |                              | 912                     | -570                     | -342                        |                            |                  |
| Total Required              | 2,731                   | 613                          | 5,472                   | 3,990                    | 2,394                       | 11,856                     | 9,462            |

This analysis assumes it is justified to include, as part of the shortfall calculation, the additional dwellings related to an employment strategy for a period which has seen an overall loss of employment land. If an assumption were to be made that no provision should be included for the shortfall then the requirement for the 10 year period starting in 2022/23 would be 7,938 dwellings. With a start date of 2023/24, this requirement is slightly lower at 7,885 dwellings as a result of the buffer adjustment being applied over the remaining 8 years rather than 9.

**Table 3 Ten Year Requirement (Year 1 as 2022/23)**

| Housing Requirement | 10 Year Requirement | Cumulative 10 year total |
|---------------------|---------------------|--------------------------|
| Target              | 760 x10             | 7,600                    |
| Buffer (20%)        | 760-422.2=337.8     | 7,600+337.8= 7,937.8     |

The Council is concerned that the exceptional circumstances do not currently exist to meet the full entirety of the FOAHN and welcomes the opportunity you have given the Council for an early review of the Plan. This provides an opportunity for the review to accommodate future reforms of the planning systems, the results of the Census as well as a review of the employment strategy, changing working and commuting patterns. This would need to take place within five years of the adoption of the plan to ensure a five year land supply is maintained.

The Council has undertaken a review of its housing land supply and expected rates of delivery. Promoters of sites were sent out a questionnaire to provide an updated position of their sites' delivery. This informed the housing trajectory produced for Cabinet Planning and Parking Panel on 21<sup>st</sup> July 2022 which I enclose as Appendix A and the evidence relating the five year land supply which is forwarded to you separately.

The commitments figure for unallocated sites was also updated for the period to 31<sup>st</sup> March 2022 taking into account lapsed consents and avoiding double counting with allocations. Since 31<sup>st</sup> March another 45 dwellings have been approved this is a net figure.

The Council currently has before it applications which would if all were granted would result in an additional 1,491 dwellings (although this is considered unlikely). The Inspector should note that some of these applications relate to sites considered by the examination and include the previously developed part of HS30, the additional dwellings proposed for SDS3, StL13, BrP12, BrP1 and WGr3. Furthermore, an additional 167 dwellings on 2 sites are subject to appeal.

A further two applications are awaiting validation. This includes SDS2 Birchall Garden Suburb the application for which is for 1,300 dwellings in Welwyn Hatfield as well as significant development and infrastructure within East Herts.

The Council has reviewed the capacity of sites submitted to the examination in January 2022 which at that time resulted in a strategy which would deliver 13,279 dwellings over the Plan period. The Council has received applications for a number of sites with an increase in capacity which are in the process of being determined. In addition the Council anticipates that it will be receiving revised proposals for a reduction in numbers at SDS3 Broadwater Road West and would now be unlikely to deliver the 2,003 dwellings previously submitted to the examination. The Council has therefore reverted to the numbers associated with the permitted scheme for 1,403 dwelling equivalents. The updated capacity assessments are attached as Appendix B. The Council now consider that capacity from these sites, windfall

and commitments would result in a supply of 12,775 dwellings which over the 10 year period would equate to 8,517 dwellings and a five year land supply of 5,292 dwellings.

**Table 4 - Update to Housing Supply since January 2022 Special Cabinet**

| Supply Source   | January 2022 - Special Cabinet | Updated capacity | 10 year Capacity | 5 Year Capacity |
|---|--------------------------------|------------------|------------------|-----------------|
| Completions   | 2,514                          | 2,731            | n/a              | n/a             |
| Estimated completions 2022/23   | n/a                            | 613              | n/a              | n/a             |
| Commitments – minus estimated 22/23 completions                         | 806                            | 486              | 486              | 462             |
| Windfall  | 1,668                          | 1,529            | 1,112            | 417             |
| Small Sites   | 14                             | 13               | 13               | 5               |
| Site Allocations (see Appendix C) – less any expected completions 22/23 | 8,277                          | 7,403            | 6,906            | 4,408           |
| Total   | 13,279                         | 12,775           | 8,517            | 5,292           |

This would equate to an annual average over the 10 year period of 851.7 dwellings only 60 dwellings per annum short of the residual requirement which includes within it the shortfall associated with the employment strategy. The Council does not consider it is justified that the shortfall should incorporate an allowance for the employment strategy when the Council has seen an overall loss of employment land in the borough. This supply would make more than sufficient provision for the 10 year FOAHN and buffer requirement of 7,938 dwellings.

The Council considered options for additional sites including the retention of the three sites found sound HS22, HS29 and HS30. It noted that the supply it has identified of 12,775 dwellings results in 26% growth of dwellings in the borough. It also noted that this relates to its proportionate share of the government’s 300,000 dwellings per annum target based on its current population<sup>1</sup>. Whilst it is recognised that there is an urgent need for additional housing the Council felt that there was no case for it to meet more than its share at this time particularly when this would require the release of high harm land from the Green Belt.

The additional sites submitted to the examination are preferred. They meet the National Planning Policy Framework test to consider other reasonable alternative and meet the Calverton Test of reducing the harm to the minimum where this consistent with sustainable development. The sites result in either no harm (being previously developed) or have less harm to the Green Belt than HS22, HS29 and HS30. They are located in sustainable locations and would contribute to five year land supply. HS22 is reliant on the construction

of a new footbridge over the East Coast main line and as a consequence is considered to be more likely to deliver in years 6-10.

During the process of considering the need for additional dwellings the Council has received unprecedented concern from the public relating to development in the Green Belt in particular on High Harm land, to the creation of Symondshyde and to the density of development on site SDS3 Broadwater Road West. The Council has to have regard to public views in their decision making.

The Council has therefore drafted Main Modifications on the basis of this strategy which will be forwarded to the Inspector separately.

To conclude, the Council considers that exceptional circumstances do not exist to make full provision for a shortfall which relates to an increase in employment land when the borough has seen an overall loss of employment land. The Council recognises there is an urgent need to increase the supply of housing and has identified a strategy which over the 10 year period would equate to 8,517 dwellings (851 dwellings per annum).

It should be noted the identified strategy does not include HS22, HS29 and HS30. Not including these sites reduces the potential supply over ten years from 8,965 (896 dwellings per annum) to the identified 8,517 dwellings (851 dwellings per annum). The identified strategy that results in an annual provision of 851 dwellings per annum is a significant uplift on the current average of 455 dwellings per annum.

The Council considers that the 2018-based demographic projections which informed the FOAHN have significantly overestimated population growth in the borough and even the Principal projections result in an overestimate. The Council is not anti-development and do consider that there is a need for an uplift associated with household size and affordability. The housing supply identified by the Council makes adequate provision for this.

The Council consider that the need to release any high harm land should be the subject of the early review within 5 years of adoption along with other options for village expansion where this is sustainable alongside options for a new settlement.

The Council wishes to move swiftly to public consultation on Main Modifications and will confirm the timetable once a response has been received from the Inspector on the content of the Main Modifications.

Yours faithfully



Sue Tiley  
Planning Policy and Implementation Manager

---

<sup>i</sup> Welwyn Hatfield's population is 0.2% of England and Wales' population and 851 dwellings represents 0.3% of 300,00 dwellings