

Five-Year Housing Land Supply Statement

Land to the North of Bradmore Way, The
Brookmans Park Estate, Hertfordshire (BrP12a)

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Contents

1	INTRODUCTION & SUMMARY	1
2	HOUSING LAND SUPPLY POSITION	2
3	NATIONAL PLANNING POLICY & GUIDANCE	3
4	WELWYN HATFIELD HOUSING LAND SUPPLY POSITION	6
5	CONCLUSIONS	9



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1 Introduction & Summary

- 1.1 This report has been prepared by Woods Hardwick Planning Ltd to provide an assessment of the Council's five-year housing land supply position, supporting an outline planning application for residential development of up to 125 dwellings, a C2 care facility for up to 60 bedrooms with associated facilities, a scout hut and all ancillary works on Land to North of Bradmore Way, The Brookmans Park Estate.

2 Housing Land Supply Position

- 2.1 The latest Annual Monitoring Report (AMR) 2020/21 is due to be formally published March 2022 and states that as of 1st April 2021 Welwyn Hatfield has a deliverable five-year housing land supply of 2,594 dwellings. Assessed against its local housing need, with the application of the requisite 20% buffer, this equates to a supply of just 2.46 years.
- 2.2 The Council has accepted that until such times as a new Local Plan is adopted, their local housing need is calculated using the standard method as set out in the Planning Practice Guidance (PPG). Using the standard method they state that their local housing need equates to 878 dwellings per annum, with a five-year requirement of 4,390 dwellings.
- 2.3 Furthermore, a buffer is to be applied to this figure which is to be based on the latest Housing Delivery Test (HDT), which was published 14th January 2022. The Council's result was 66% and therefore Paragraph 74 of the NPPF requires that a 20% buffer be added to the local housing need figure. This results in a five-year housing requirement of 5,268 dwellings (1,055 per annum).

3 National Planning Policy & Guidance

The National Planning Policy Framework (NPPF)

- 3.1 In respect of establishing housing need, paragraph 61 of the Framework states the following:

‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.’

- 3.2 The Framework goes on to state at paragraph 74 that:

‘Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan⁴⁰, to account for any fluctuations in the market during that year; or

c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.’

- 3.3 This paragraph is supported by Footnote 38, which states:

‘Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.’ and

- 3.4 Footnote 41 which states:

‘This will be measured against the Housing Delivery Test, where this indicates that

delivery was below 85% of the housing requirement.'

- 3.5 Annex 2: 'Glossary' of the NPPF defines the terms deliverable and local housing need as follows:

'Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular: a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'

'Local housing need: The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).'

Planning Practice Guidance (PPG)

- 3.6 The PPG sets out how local housing need is calculated

Paragraph: 004 Reference ID: 2a-004-20201216 sets out the approach to calculating local housing need as follows:

Step 1 - Setting the baseline - using the 2014-based national household growth projections. Using these projections, calculating the average annual household growth over a 10-year period.

Step 2 - An affordability adjustment - the average annual projected household growth figure is adjusted based on the affordability ratio for the area.

Step 3 - Capping the level of increase - a cap of 40% above the projected household growth, as calculated in Step 1, is applied to limit the increase which a local authority faces.

- 3.7 Paragraph: 002 Reference ID: 68-002-20190722 defines what a 5-year land supply is:

'A 5-year land supply is a supply of specific deliverable sites sufficient to provide 5 years' worth of housing (and appropriate buffer) against a housing requirement set out in adopted strategic policies, or against a local housing need figure, using the standard method, as appropriate in accordance with paragraph 73 of the National Planning Policy Framework.'

- 3.8 Paragraph: 003 Reference ID: 68-003-20190722 sets out the purpose of the 5-year housing land supply:

'The purpose of the 5-year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years. Where strategic policies are more than 5 years old, or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement.'

- 3.9 Paragraph: 005 Reference ID: 68-005-20190722 provides guidance on what housing figure authorities should use when calculating their 5-year housing land supply, stating:

'Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5-year housing land supply figure where:

- *the plan was adopted in the last 5 years, or*
- *the strategic housing policies have been reviewed within the last 5 years and found not to need updating.*

In other circumstances the 5-year housing land supply will be measured against the area's local housing need calculated using the standard method.'

- 3.10 Paragraph: 022 Reference ID: 68-022-20190722 sets out how buffers should be added to the 5-year housing land supply requirement, stating:

'To ensure that there is a realistic prospect of achieving the planned level of housing supply, the local planning authority should always add an appropriate buffer, applied to the requirement in the first 5 years (including any shortfall), bringing forward additional sites from later in the plan period. This will result in a requirement over and above the level indicated by the strategic policy requirement or the local housing need figure.

Buffers are not cumulative, meaning that an authority should add one of the following, depending on circumstances:

- *5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5 year housing land supply;*
- *10% - the buffer for authorities seeking to 'confirm' 5-year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in paragraph 74 of the National Planning Policy Framework), unless they have to apply a 20% buffer (as below); and*
- *20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.'*

4 Welwyn Hatfield Housing Land Supply Position

Local Housing Need Calculation

4.1 In light of national policy set out in the NPPF and guidance within the PPG, it is clear that the five-year housing land supply in Welwyn Hatfield should be measured against the local housing need figure, as calculated using the standard method. The base date for assessing this is the 1st April 2021, using the most up-to-date Annual Monitoring Report.

4.2 Following the three steps as set out in the PPG, the calculation is as follows

Projected Annual Household Growth 2021-2031 - 628 dwellings

Adjustment Factor - 1.4, cap has been applied as affordability ratio is 12.37 (2021 figure) which would otherwise require an adjustment of 1.52

Local Housing Need - 879 dwellings per annum (628 x 1.4).

4.3 The local housing need for the next five years is 4,395 dwellings. Following on from this, there is a requirement as per paragraph 74 of the Framework, to apply the appropriate buffer. In Welwyn Hatfield's case, the latest 2021 HDT (published January 2022) result is 66%, which therefore requires the application of a 20% buffer.

4.4 The local housing need plus the required buffer means that the Council is required to deliver 5,274 dwellings, equating to 1,055 dwellings per annum. It should be noted that this figure is marginally higher than that in the AMR. The difference is due to the latest affordability figures being published after the AMR was prepared.

Supply

4.5 The AMR sets out that the Council claims to have a deliverable housing land supply of 2,594 dwellings. This figure includes a projected supply of sites, windfall assumptions and non-implementation rates. We have assessed that supply and submit that this projected supply is an over-estimation. Principally, this statement argues that a significant deduction should be made for completions on the Broadwater Road West SPD Site.

4.6 The Broadwater Road West SPD Site benefits from a hybrid planning consent for mixed use development, which includes up to 850 residential dwellings, with consent having been granted in August 2017 under planning consent ref: N6/2015/0294/PP. A further planning application was submitted in 2018 for a mixed-use development, which included up to 1,340 new dwellings. Consent was granted in February 2019 under planning consent ref: 6/2018/0171.

4.7 As of the time of writing, the southern phase of the development is under construction. This comprises approved Blocks 10 and 11 and totals 208 units. Further phases on the

remainder of the site are not now being brought forward as per the 2018 planning consent. Rather two new planning applications are currently with the council for determination.

4.8 The first application is as follows:

6/2021/0181/MAJ - Hybrid planning application with detailed consent for 399 dwellings (Private Rented Sector) and 153 dwellings, residential care accommodation and community facilities and outline consent for up to 418 dwellings.

4.9 This application relates to the northern part of the Broadwater Road SPD site and was submitted in January 2021. There currently is no scheduled date for the application to be presented to the Development Management Committee.

4.10 The second application relates to the central (remaining) part of the site and is for the following:

6/2021/0671/MAJ - Hybrid planning application with detailed consent for 317 dwellings and outline consent for up to 404 dwellings.

4.11 This application was submitted in March 2021 and as with the above planning application there is currently no scheduled date for the application to be presented to the Development Management Committee.

4.12 The Council's trajectory indicates that there will be 616 deliverable dwellings on this site in the five-year period 2021-2026, as follows:

2022/23 - 107 dwellings;

2023/24 - 101 dwellings;

2024/25 - 128 dwellings;

2025/26 - 280 dwellings.

4.13 There is no contention that the site should not be considered deliverable during the five-year period. However, this statement avers that the number of dwellings that should be considered deliverable should be significantly reduced.

4.14 As stated previously, the first phase of development is under construction and there is no dispute that those 208 dwellings (in years' 2022/23 and 2023/24) should be included within the projected supply for the five-year period. However, any delivery from the remaining phases of the site is questionable.

4.15 Prior to the implementation of Phase 1, all relevant conditions were discharged pertaining to that phase alone. No information has been submitted to discharge the conditions in so far as they related to the further phases of development.

4.16 It is clear from the evidence that those further phases of development as approved under the 2018 planning consent will not be implemented. Rather, alternative development proposals have been submitted as per the two major hybrid planning applications detailed above. Those applications have been with the Council for a year and there is currently no scheduled timetable for the applications to be presented to Development Management

Committee.

- 4.17 In light of the above position, these later phases are some way from being in a position where they can commence. The applications have to be approved by the committee, section 106 agreements need to be negotiated and completed and pre-commencement conditions need to be discharged before any work can commence. It is anticipated that there will be a significant number of conditions to be discharged. The 2018 planning consent was subject to 56 conditions.
- 4.18 Based on the foregoing, it is submitted that only the 208 dwellings currently under construction can be considered deliverable within the five-year period. A deduction of 408 dwellings should therefore be made to the projected housing land supply.
- 4.19 The deliverable supply for Welwyn Hatfield for the period 2021-2026 is therefore 2,186 dwellings i.e. $2,594 - 408 = 2,186$ dwellings. The following table sets out the position having regard to this revised figure.

A	Local Housing Need Per Annum	879
B	Five Year Requirement (A x 5)	4,395
C	Five Year Requirement + 20% Buffer (B x 1.2)	5,274
D	Annual Requirement (C/5)	1,055
E	Projected Five Year Supply 1 st April 2021	2,186
F	Years Supply (E/D)	2.07
G	Total Shortfall (C-E)	3,088

5 Conclusions

- 5.1 This report has carried out an assessment of the Council's five-year housing land supply position. The Council's most recent AMR states that the Council can only demonstrate 2.46 years' supply, in numerical terms equating to a substantial shortfall of 2,674 dwellings.
- 5.2 Having reviewed the Council's position and those sites that are considered to be deliverable, it is concluded that the Council's deliverable supply should be reduced to reflect delayed delivery on one of its key sites, the Broadwater Road West SPD site.
- 5.3 The evidence supports a deduction of 408 dwellings from the deliverable supply, which based on the preceding table, would increase the shortfall to 3,088 dwellings and leave the Council in a position where they can only demonstrate 2.07 years' of housing land supply.
- 5.4 The application site, Land to the North of Bradmore Way, Brookmans Park, is within the ownership and control of the applicant. The Council can therefore be assured that 125 new C3 dwellings (including 45 Affordable Housing units) and a 60-bedroom C2 care home facility (as outlined in paragraph 21.2 of the Draft Submitted Local plan 2016) can all be delivered within the first five-years of the Plan period.

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