

Proof of Evidence
In Respect of
Welwyn Hatfield
Borough Council's
Housing Mix &
Five Year Housing
Land Supply

PINS Reference APP

Appeal Site: Bio Park

Summary Evidence of Alex Roberts
Prepared on behalf of
HG Group
June 2022

CONTENTS PAGE

Table of Contents

1 - EXPERIENCE AND SCOPE OF EVIDENCE.....	3
2 - INTRODUCTION	5
3 – HOUSING NEED, MIX AND FIVE YEAR HOUSING LAND SUPPLY NATIONAL POLICY AND GUIDANCE	10
4 – REVIEW OF WELWYN HATFIELD LOCAL POLICY AND EVIDENCE BASE	17
5 – REVIEW OF LOCAL HOUSING DEMAND IN WELWYN HATFIELD	32
6 – VIABILITY CONSIDERATIONS AND OTHER FACTORS	42
7 – FIVE YEAR HOUSING LAND SUPPLY IN WELWYN HATFIELD	43
8 – SUMMARY AND CONCLUSIONS.....	48

1.0 Experience and Scope of Evidence

1.1 Experience

- 1.1.1 My name is Alex Roberts; I have a Joint Honours Degree in Urban and Regional Planning and Geography and am an Associate Member of the Royal Town Planning Institute. I am a Director of Lambert Smith Hampton's (LSH), Planning, Regeneration + Infrastructure division, leading the Economics and Planning Policy team. My work specialises in undertaking planning evidence base projects including the assessment of housing need and mix and the assessment of 5 year housing land supply. I undertake this work for both private and public sector clients.
- 1.1.2 I have a wide range of experience and have held various positions within the private consultancy and local government. Prior to joining LSH I was a Planning Director at a national planning consultancy for 6 years, prior to this I held the post of Development Plan Manager at Tamworth Borough Council.
- 1.1.3 Between 2004 and 2006, I worked at Swansea University. Whilst at the university I undertook research into and assessments of the 2001 Census and in particular changes to urban populations since 1991. Through this work I wrote articles and papers with colleagues. I also taught undergraduate courses on the use of statistical analysis and geographic information systems (GIS) in research.
- 1.1.4 In 2006, I took up the position of Planner within the Cassidy Group. I undertook work identifying development opportunities across England and promoted the development of sites through the development plan process.
- 1.1.5 In 2007, I began working with Wakefield Council as a Senior Planner, within the Spatial Policy department. Whilst at the Council I assisted regional colleagues on the preparation of the Yorkshire and Humber Regional Strategy, in respect of housing and employment need. I prepared and gave evidence regarding housing need and supply at the examination of the Council's Core Strategy, Area Action Plan and Site Allocations DPD.
- 1.1.6 In 2012, I joined Tamworth Borough Council as Development Plan Manager, a post which I held for 3 years. Within that time, I prepared and represented the Council at the examination of the Tamworth Local Plan. I also represented the Council at a sub-regional and regional level on strategic planning issues, with particular focus on housing, employment, and transport.
- 1.1.7 I have previously given evidence at a public inquiry on housing land supply and housing need matters in Welwyn Hatfield, in 2018, where the Inspector concluded the scale of supply fell considerably well short of 5 years. The Inspector accepted my evidence on the housing requirement and housing land supply matters. The appeal was at Entech House, Woolmer Green, reference APP/C1950/W/17/3190821(CD 17)

1.2 Scope of this Evidence

- 1.2.1 I have been instructed by the Appellant to prepare a proof of evidence which sets out the Appellant's position on housing land supply and the evidence which supports the housing mix of the appeal site.
- 1.2.2 I confirm that this evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I also confirm that the opinions expressed are my true and professional opinions.

A square box containing a handwritten signature in dark ink. The signature appears to be 'A Roberts' written in a cursive, slightly stylized hand.

Signed:

Alex Roberts, Director, Lambert Smith Hampton

9 June 2022

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2.0 Introduction

2.1 Overview

- 2.1.1 The appeal is made by HG Group Ltd (the Appellant') against Welwyn Hatfield Council's refusal application 6/2020/3420/MAK; the demolition of existing buildings and construction of 289 residential units and community hub, with public realm and open space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.
- 2.1.2 I have been instructed by HG Group Ltd to give evidence on the issue of the scheme's proposed Housing Mix and Five-year housing land supply in Welwyn Hatfield.

Housing Mix

- 2.1.3 The Council's extant development plan, is the Welwyn Hatfield District Plan, adopted in 2005, with certain policies saved by the Secretary of State in April 2008. Policy H8 – Dwelling Type and Tenure, was **not** saved in 2008. The policy was not saved as it's aims were covered within PPS3 – Housing. The then relevant national policy statement on housing. No other extant policies of the WHDP have regard to housing mix.
- 2.1.4 The Council's emerging Local Plan was submitted in May 2017 and was prepared under the 2012 NPPF, it is therefore subject to the transition arrangements, as set out in the subsequent 2018, 2019 and 2021 versions of the NPPF. The Plan is still under examination.
- 2.1.5 Through this examination period the Council have responded to the publication of several household projections, which may have a meaningful impact on the calculation of housing need. The June 2021 letter from the Local Plan inspector Melvyn Middleton, to the Council (CD 16) summarises the change in evidence base over the (then) 4-year period of examination. In the Inspector's conclusions, he resolved that the housing requirement figures should be amended to 15,200 for the plan period 2016 to 2036, which equates to an average of 760 dwellings per annum. The Council's evidence, which the Inspector drew these conclusions from is the August 2020 report - The implications of the 2018-based SNPP and SNHP on the Welwyn Hatfield OAN (CD 20) which recommended a range for the housing requirement of between 715 - 800 dwellings per annum. It is important to note that this report does not contain recommendations for housing mix in Welwyn Hatfield. However, through the course of preparing the SoCG for this inquiry, a note has been prepared by the Council, at the request of the appellant.
- 2.1.6 As I will set out in more detail, emerging policy SP7 concerns housing mix. The policy is currently under examination and has unresolved objections, which have led to suggested changes. These changes are yet to be consulted on through a Main Modification consultation.
- 2.1.7 The most recent, published housing need assessment, which contains the Council's evidence on housing mix is the 2019 SHMA update (CD 19). This document was prepared to support the Council in the on-going examination of the submission draft Local Plan for Welwyn Hatfield. The preceding SHMAs were the evidence base documents, the Council was reliant on in the preparation of policy SP7 on housing mix.

2.1.8 The Local Housing Need (LHN) figure used in the 5YHLS assessment is from 2021/22, which gives a total of 878 dwellings per annum. The LHN figure for 2022 going forward is 888 dpa.

Housing Land Supply

2.1.9 The most recent, published housing land supply position is 1st April 2021 (CD 10). This should be based upon policy and guidance from the 2021 Framework and associated Planning Practice Guidance.

2.1.10 Whilst covering a 5-year period that started over a year ago, the base date is agreed to be appropriate for assessing the Council's supply of sites for the purposes of this inquiry.

2.1.11 The Appellant's areas of dispute on the Council's 5 Year Housing Land Supply, are set out in summary within the Housing Mix & Housing Land Supply Statement of Common Ground (SoCG), and in detail within a later section of this proof of evidence.

2.1.12 The areas of dispute between the Council and the Appellant for this appeal, are:

1. The Council's Windfall Allowance of 278 dwellings, in years 4 and 5 of the assessment period (or 139 dwellings per annum). Should be **reduced** by 218 down to 60 dwellings (30 dwellings per year).
2. Broadwater Road West SPD Site – 616 dwellings, should be **reduced** by 188, to 428 dwellings in the 5-year period
3. Link Drive for 80 dwellings should be **removed** from the supply
4. Garages at Hollyfield for 13 dwellings should be **removed** from the supply
5. 29 Broadwater Road for 128 dwellings should be **removed** from the supply
6. Norton Building, Bridge Road East for 122 dwellings should be **removed** from the supply

2.1.13 The cumulative impact of removing, or reducing components of the Council's supply, is a **reduction of 749 dwellings** in the assessment period. This reduces the Council's supply from 2,594 to 1,845 dwellings. This results in a 5YHLS land supply of **1.75 years**. It should be noted that this level of supply is similar to that I previously identified in 2018 at the Entech House appeal. The lack of improvement to the land supply position is not surprising given the protracted examination process of the Local Plan.

2.1.14 It is agreed between the Appellant and the Council, that for the purposes of this inquiry, the matter of housing land supply will not be tested through the cross examination of evidence, nor through an Inspector led roundtable discussion. Both parties have invited the Inspector to determine the appeal based on a range and not a specific figure.

2.1.15 The Appellant's position on Welwyn Hatfield's 5 Year Housing Land Supply is that the Council can only demonstrate a land supply of 1.65 Years. The Council's position is 2.46 Years. The difference between this is 856 dwellings, this difference is substantial and equates to almost 1 year of housing need, as calculated using the standard method (878 dwellings in the AMR), this is a very substantial shortfall.

2.2 The Council's Case

2.2.1 The Council's case is set out in their Statement of Case. Of relevance to my proof of evidence, are paragraphs 5.6 (pages 9 to 10), which sets out the Council's reason for refusal related to Housing Mix and then paragraphs 6.7 to 6.44 (pages 17 to 23) which present the Council's case on this specific matter..

2.3 The Appellant's Case

2.3.1 The Appellant's case, specific to housing mix is set out in the appendix to their Statement of Case.

2.3.2 I consider that the mix of the appeal site **does meet** housing needs and that it is reflective of the Council's evidence (SHMA) and also takes into account the Council's evidence on housing mix and the latest information on housing demand in the area and has regard to design, townscape and viability issues.

2.3.3 The proposal will meet the needs of a range of groups, as identified within paragraph 62 of the NPPF. These groups would include households who require affordable housing, families with children, older persons, and persons with disabilities, as well as other non-specified households.

2.3.4 There is no requirement for the proposal to meet the Council's preferred mix on a site by site basis and the Council are treating the submission Local Plan policy, as if it were part of the extant development plan. Even if it were, there is no specific mix requirement within the proposed policy and the policy written to be flexible. The Council already acknowledge this. Furthermore, they acknowledge that it will require a range of housing sites to meet the overall housing need and desired mix of Welwyn Hatfield over the whole plan period.

2.3.5 The most recent AMR published by the Council shows that housing delivery has been slow over many years and that based on the Council's implied mix for all property types, not enough have been cumulatively delivered and needs have failed to be met.

3.0 Housing Need, Mix and Five-Year Housing Land Supply National Policy and Guidance

- 3.1.1 In summary, local planning authorities are required to ensure that the needs of different groups with specific housing requirements are assessed and met through planning policies. Apart from the need to prepare evidence and subsequent planning policies, there is no specific guidance on how these needs should be assessed, there is no specific paragraph within the NPPF which sets out how matters of housing mix should be dealt with by a decision maker, there is no nationally prescribed housing mix and such matters should be dealt with through a Local Plan.
- 3.1.2 Clear evidence is required to demonstrate that sites have a reasonable prospect of delivery in the assessment period. This issue was considered at the 2018 public inquiry at Entech House and the Inspector did not support the Council's approach then. That approach has not changed, and the necessary clear evidence is still not provided.

4.0 Review of Welwyn Hatfield Local Policy and Evidence Base

4.1.1 The Council have no extant development plan policy for housing mix and the emerging policy SP7 is still under examination. The policy has been re-drafted but has not been subject to any further consultation. I consider that the policy is flexible and does not prescribe a mix to proposals and that the figures within the submission plan, or later updates, should not be used as a ‘starting point’ or benchmark to assess proposals with. Therefore, there is no policy requirement to bring forward a specific mix, or within a specific range within Welwyn Hatfield and the proposed policy should be only afforded very limited weight.

4.1.2 The evidence base supporting the submission plan’s position on housing need and housing mix has been updated several times through the examination. For the purposes of this inquiry, it is not necessary to go through this in detail. However, it is important to highlight two points. Firstly, the evidence base authors were explicit in the following paragraph:

The analysis presented above should therefore only be used for guidance in its translation into policy and for the monitoring of future development. While this evidence provides a valuable overall indication of the broad mix of housing which may be required, it is recommended that policies are not overly prescriptive in directly basing requirements for individual sites on the illustrative mix presented above. The individual mix of housing provided on a site-by-site basis will need to take account of local market evidence and viability considerations, which will have an important influence on the appropriate mix.

4.1.3 Secondly, the range of mixes recommended were all based on demographic evidence. Any adjustments to the overall housing need figure were made to increase the total requirement and do not have an explicit impact on the types of dwellings required. I do not consider that housing market information has influenced the recommended mixes.

Table 1: Summary of the 3 mixes

	1 bed	2 bed	3 beds	4+ beds
2017 SHMA	13%	22%	41%	23%
2019 Technical Paper	14%	23%	41%	22%
AMR	15%	23%	41%	21%

4.1.4 When looking at past housing delivery, there have been in total more smaller properties built, however in only up to 4 years have totals of 1 and 2 bed properties achieved reaching the implied housing mix, when set against an OAN of 760dpa. Looking at the future supply against the next 5 years requirement, it is only 1 bed properties which just about achieve reaching the implied housing mix, when set against an LHN of 5,268 dwellings. When

taking into consideration my concerns over the Council’s 5YHLS and making downward adjustments to the supply, the overall position is worse, and 1 bed properties did not reach the implied housing mix.

4.1.5 It is clear that neither past completions, nor the current future supply have been meeting housing needs at all and the implied mix has not been consistently met for any property type. As I set out above, this will undoubtedly have real world consequences for Welwyn Hatfield and those who wish to form new households.

4.1.6 Therefore, when considering these points alone, without looking at local market data, there is already compelling justification for the schemes proposed mix, as it will go some way to addressing past shortfalls of property types and, or meeting future needs. Applying the most recent implied mix to the LHN shows each property type has not been catered for in full, more so for the larger properties. Presently there are only approximately 107 4 bed properties in the future supply, the proposal will deliver 8 additional and there are only 176 3 bed properties in the supply, the proposal will bring forward a further 26. Presently there are only approximately 898 2 bed properties in the future supply, the proposal will deliver 126 additional and there are only 740 1 bed properties in the supply, the proposal will bring forward a further 129. Whilst it would not be appropriate to carry out a land supply assessment on specific property types, similar to that of a 5YHLS, the contribution the proposal can make to bringing forward properties which meet the needs of different groups, identified in the Council’s evidence and within the NPPF is evident, particular when there is a lack of future supply and in previous years needs have gone unmet.

Table 2: Housing Mix of Proposed Development

Size	Dwellings	Percentage
1-bed	129	44%
2-bed	126	44%
3-bed	26	9%
4-bed	8	3%
Total	289	100%

5.0 Review of Local Housing Demand in Welwyn Hatfield

- 5.1.1 From the analysis of transaction data over the most recent 3-year period and looking at the longer-term transaction of houses in the district, it can be summarised that; residential property across Welwyn Hatfield is comparatively more expensive than across England, and is one of the most expensive places to buy property in Hertfordshire. Affordability has worsened across the district, on all metrics and it is likely the low level of new builds in the areas has exacerbated this trend, this will be caused by fewer new properties coming onto the market, which reduces supply coupled with a continual demand for property (as evidence in the SHMA/technical papers). Despite an uptick in new build transactions in recent years, the average price paid in WGC has still increased and only recently stabilised.
- 5.1.2 Compared to other parts of the district, WGC is comparatively cheaper and has higher proportions of less expensive housing stock than Hatfield and Welwyn, with the greatest proportion of properties under £400,000 by some margin.
- 5.1.3 Looking into transactions in more detail across WGC it can be seen the most expensive properties are towards the fringes of the town, with the cheaper transactions taking place in the centre and towards the east. Looking at the transactions based on property type, this is explained by most transactions in the lower value area are flats and terraced houses.
- 5.1.4 From the local market information, it can be concluded that new development coming forward in WGC, particularly in central locations would not command a premium prices as seen in Hatfield and Welwyn. Therefore, new development would need to be aimed at markets of under £400,000. The types of property transactions, in the central and eastern locations, where the appeal site is located, are flatted developments and terraced properties which are cheaper than semi and detached properties in WGC. It is relatively un-tested that there is any market demand for larger properties within these locations, the transaction data strongly suggests that there is a demand for smaller property types in this appeal site's location and that it is possible new builds are in some instances cheaper than second hand transactions, the likely reason for this is that they are mostly flatted developments.
- 5.1.5 Data shows that first time buyers are a small proportion of the market in the area and that it is likely more would be able to come into the housing market if more new build properties were built, as in Welwyn Garden City, these are often cheaper than those from the 2nd hand market. These types of properties are typically in the more central location and are flats.
- 5.1.6 Therefore, local market data for Welwyn Garden City, and in particular the central location shows that there is a strong demand for smaller bedroom properties and that the demand for larger properties in central locations is un-tested. It should be recognised that the demand for larger properties is experienced on the fringes of the town. Most new developments in WGC have been flatted, however it is important to note that these transactions are often lower than the 2nd hand average in WGC, this is an important consideration. The

proposed mix for the appeal site, based on market evidence, should be aimed towards lower cost properties and given its location and the strong demand for flats, the development should be predominantly flatted.

6.0 Viability Considerations and other factors

- 6.1.1 The evidence base supporting the Council's position, is the SHMA, or various technical reports. The recommendations for housing mix in these reports, in short, state that viability and other factors need to be considered when arriving at a final mix for a scheme.

7.0 Five Year Housing Land Supply in Welwyn Hatfield

7.1.1 The steps outlined in my main proof have assessed Category A sites, Category B sites, as well as the windfall allowance. These reductions result in the Council’s supply being reduced to 1.75 years as shown in the table below.

Table 3: Comparison of council’s and appellants land supply assessments

Element of supply /requirement	Council’s supply	Adjusted Supply
Local Housing Need (875)	4390	4390
Addition of buffer (20%)	5268	5268
Supply 2021/22 to 2025/26	2341	1,706
Windfall assumption	278	164
Non implementation rate	-25	-25
Five year supply	2,594	1,845
Years supply	2.46	1.75

7.1.2 To conclude, the Council’s current published land supply position is 2.46 years, thereby falling far below the five years as required by the Framework. Further to this, our assessment of the sites has found that this position can be reduced to 1.75 years, thereby demonstrating that there is an extreme and significant deficiency of land for housing and that the only way to reduce this gap further is by permitting development such as the appeal site.

8.0 Summary and Conclusions

- 8.1.1 I have been instructed by the Appellant to present evidence on housing mix and 5 Year Housing Land Supply for this appeal.
- 8.1.2 The proposed development does provide a mix of property types which meet housing need in Welwyn Hatfield and takes into consideration local housing market, viability, townscape, heritage and design considerations. The proposal is reflective of the Council's SHMA.
- 8.1.3 The proposal will bring forward a mixture of properties which meet M4(2) or M4(3) building standards and will provide housing, for a range of groups, in an area which has a substantial shortfall in new housing coming forward and has over recent years failed to keep up with housing demand. This is evidence in the Council's performance based on the HDT results and when looking at my assessment of the 5YHLS or the Council's own position.
- 8.1.4 The Council's case is reliant on a submission local plan policy, which is still subject to outstanding and unresolved objections, has had changes drafted, but is still yet to be consulted as a Main Modification to the Plan. The examination of the Local Plan is still on-going, and the outcome remains uncertain. The examination process has been on-going now for many years. In turn this relies on evidence, which only takes into consideration demographic data and has no consideration of the local housing market. Furthermore, the Council's housing need consultant is very clear that the evidence should not be prescriptive or act as a target to aim for, which the Council are attempting to do through it's application in the refusal of the original application. The purpose of that element of the SHMA evidence was to monitor development in the area and not act as a target or restrictive development management policy.
- 8.1.5 The Council's housing need evidence shows that there is a need for larger properties in Welywn Hatfield, however one of the households experiencing the largest growth is single and two person households. Housing delivery has been very poor in Welwyn Hatfield, whilst most new properties coming to market have been 1 or 2 bedroom flats, the quantum delivered has still not met needs in recent years, based on the Council's on metrics alone. Looking forward there is still a need to be met for these types of properties.
- 8.1.6 The Council's latest AMR 2021 provides general context to the current housing market in Welwyn Hatfield. This is set out within Indicator H07, page 34 onwards. This shows, that house prices in Welwyn Hatfield have continued to rise since 2006, with the rate of increase accelerating from 2013. Whilst at the same time housing delivery has been patchy and never reaching similar levels as recorded in 2006.
- 8.1.7 Average house prices are comparable to the rest of Hertfordshire, however they remain much higher than the East of England and the UK as a whole, by at least £100,000. Unsurprisingly, the affordability ratio in Welwyn Hatfield is much higher than the ratio for England, which means homes for residence are less affordable here than most places in England.
- 8.1.8 From the analysis of transaction data over the most recent 3-year period and looking at the longer-term transaction of houses in the district, it can be summarised that; residential property across Welwyn Hatfield is

comparatively more expensive than across England, and is one of the most expensive places to buy property in Hertfordshire. Affordability has worsened across the district, on all metrics and it is likely the low level of new builds in the areas has exacerbated this trend, this will be caused by fewer new properties coming onto the market, which reduces supply coupled with a continual demand for property (as evidence in the SHMA/technical papers). Despite an uptick in new build transactions in recent years, the average price paid in WGC has still increased and only recently stabilised.

- 8.1.9 Compared to other parts of the district, WGC is comparatively cheaper and has higher proportions of less expensive housing stock than Hatfield and Welwyn, with the greatest proportion of properties under £400,000 by some margin.
- 8.1.10 Looking into transactions in more detail across WGC it can be seen the most expensive properties are towards the fringes of the town, with the cheaper transactions taking place in the centre and towards the east. Looking at the transactions based on property type, this is explained by most transactions in the lower value area are flats and terraced houses.
- 8.1.11 From the local market information it can be concluded that new development coming forward in WGC, particularly in central locations would not command a premium prices as seen in Hatfield and Welwyn. Therefore, new development would need to be aimed at markets of under £400,000. The types of property transactions, in the central and eastern locations, where the appeal site is located, are flatted developments and terraced properties which are cheaper than semi and detached properties in WGC. It is relatively un-tested that there is any market demand for larger properties within these locations, the transaction data strongly suggests that there is a demand for smaller property types in this appeal site's location and that it is possible new builds are in some instances cheaper than second hand transactions, the likely reason for this is that they are mostly flatted developments.
- 8.1.12 Data shows that first time buyers are a small proportion of the market in the area and that it is likely more would be able to come into the housing market if more new build properties were built, as in Welwyn Garden City, these are often cheaper than those from the 2nd hand market. These types of properties are typically in the more central location and are flats.
- 8.1.13 Therefore, local market data for Welwyn Garden City, and in particular the central location shows that there is a strong demand for smaller bedroom properties and that the demand for larger properties is un-tested. It should be recognised that the demand for larger properties is experienced on the fringes of the town. Most new developments in WGC have been flatted, however it is important to note that these transactions are often lower than the 2nd hand average in WGC, this is an important consideration. The proposed mix for the appeal site, based on market evidence, should be skewed towards lower cost properties and given its location and the strong demand for flats, the development should be predominantly flatted.
- 8.1.14 The demographic evidence prepared by the Council and local housing market evidence identified within my proof of evidence shows that there is a need for smaller properties and that there is a demand for these

properties, in the market. Delivery of these types of properties is likely to assist 1st time buyers enter the property market, which are likely to be within the groups (1 and 2 person households) identified by the Council, projected to have strong levels of growth. Without the delivery of these types of properties, the trends identified in WGC and Welwyn Hatfield, which are potentially creating barriers to home ownership will remain or be exacerbated.

