

# Statement

Overarching strategy

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Draft 1

What is an appropriate housing market area on which to base objectively assessed need calculations for this local plan? Has the Council used an appropriate area?

1. No comment.

Are the Council's successive forecasts of housing need robust and reliable? Is its methodology for FOAHN sound? Are the FOAHN's being met within the relevant HMA's?

2. No comment.

Are the employment forecasts and targets appropriate? Are they unduly influenced by one-off historic circumstances?

3. We agree with the employment forecasts contained in the Economy Study, which was first published in July 2014, and updated in December 2015 and February 2017 (using both the East of England Forecasting Model (EEFM) (August 2016) and Experian forecasts of jobs growth (December 2016)). We also agree with the target of 16,900 new jobs in the plan period 2013 to 2032 as a hybrid scenario between the EEFM and Experian forecasts. We also agree that the Council's starting point in seeking to meet its economic needs is the Class B floorspace requirement for Welwyn Hatfield derived from the hybrid scenario is 138,000sqm.
4. We agree with the Council that model based forecasts of jobs growth should be used rather than a historic trend based approach given the one-off circumstance of the closure of British Aerospace in the 1990's and the substantial replacement of jobs at Hatfield Business Park since 2000 (the year from which there is comparable data). Indeed, the vast majority of the 18,000 new jobs created between 2000 and 2013 were at Hatfield Business Park (source: Regulation 19 representation, Arlington Business Park GP Limited). Consequently, given the Council's position that model based forecasts rather than historic trend based forecasts are appropriate for the plan period between 2013 and 2032 then it should accept that to support 16,900 new jobs 138,000sqm of floorspace is required during the plan period. Rather, we note that the Council is purporting that because 2,600 new jobs (provisional Government estimates) have already been created between 2013 and 2014 that only 14,500 new jobs now need to be planned for between 2014 and 2032, meaning that the 116,380sqm of floorspace allocated in the plan is sufficient. This approach appears to be flawed to us as the employment targets and required land supply should match the plan period and existing growth since 2013 should just be reported in the AMR. So, as the plan period is from 2013 to 2032 then the employment targets and employment land supply figures should also relate to the same period.

Has an objective assessment of the contribution land makes to the purposes of the green belt been undertaken? Do the proposed revisions to the GB boundaries result in stronger boundaries that will endure well beyond the life of this plan?

5. No comment.

What should constitute exceptional circumstances for removing land from the GB? Has the choice of land to be lost from the GB been objectively derived?

6. As has been accepted by the Council exceptional circumstances do exist to alter GB boundaries in order to plan for a sustainable pattern of growth and to ensure that sufficient land is available to meet the borough's development needs (6.2, Draft Local Plan Proposed Submission Document).

Do the spatial vision and settlement strategy reinforce the Garden City and New Town Heritage of the Borough, whilst maintaining the area's distinctive character? Is the strategy being advanced consistent with the Borough's GB location? Is the strategy now being advanced really one that seeks to maintain the existing pattern of settlements?

7. No comment.

Are the targets for growth (employment) appropriate? Are the constraints imposed by infrastructure requirements fully justified?

8. The target of 16,900 jobs during the plan period and the corresponding Class B floorspace requirement of 138,000sqm is appropriate. To argue that the floorspace requirement in the local plan should be lower because provisional estimates are that between 2013 and 2014 2,600 new jobs have already been created appears flawed. We believe that if the model based jobs forecasts of job growth conclude (under a hybrid approach) that 16,900 jobs and the corresponding land supply of 138,000sqm of employment Class B floorspace should be provided in the plan period then these are the figures that should be included in the local plan. Any jobs creation since 2013 is just part of the AMR process and the Council should be able to demonstrate what land was taken up from the allocated 138,000sqm in creating the 2,600 new jobs from the start of the plan period.

Five year land supply: are the Council's assumptions sound? Is the proposed windfall allowance appropriate? Is the proposed split housing trajectory sound? Could the proposed housing development strategy result in a five year supply of housing land?

9. No comment.

Is the overall development strategy being advanced by the Council sound?

10. Further to our previous submissions, the Council's overall development strategy is unsound as it is not justified as it has not been demonstrated that the allocation of only one strategic employment site (Marshmoor, Welham Green) is the most appropriate strategy.
11. Indeed, the inclusion of only one strategic site means that it has not been assessed against reasonable alternatives (such as Roehyde) and so not only is the plan unjustified but it is also not legally compliant as it is based on a sustainability appraisal that has not assessed reasonable alternatives taking into account the objectives of the plan. Our previous submissions make numerous references to the importance of the UK's pharmaceutical, bioscience and advanced engineering sectors in this area and that the LP makes limited reference to other policies and programmes such as the Hertfordshire Growth Deal 2014 (expanded 2015) and the Strategic Economic Plan 2014 in its employment policies and employment land allocations. In our view, the employment policies should also be qualitative (based on higher level strategies and programmes) and not just quantitative.
12. The LP is also unclear as the employment floorspace allocations do not relate to the plan period as the provisional estimates of job growth between 2013 and 2014 have already been taken into account. In our view, the plan's jobs growth target of 16,900 new jobs and the corresponding 138,000sqm of employment floorspace should be included in the targets/allocations in the LP. If it transpires that the Government's provisional estimates on job creation between 2013 and 2014

are correct then this can be reported in the AMR's.