



Strategic Planning & Research Unit

For and on behalf of
Bayard Developments Ltd. and
Wattsdown Developments Ltd

Matter 4-5
Examination of the
Welwyn Hatfield Local Plan 2011 – 2033
Representor Numbers:
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MATTER 4 – GREEN BELT REVIEW

Has an objective assessment of the contribution land makes to the purposes of the GB been undertaken?

- 4.1 An objective assessment has been made however the balance between protecting land as a function of policy and meeting the needs of the community for housing and employment opportunities is incorrect.
- 4.2 TPA/2 makes the point that the Green Belt has been substantially unchanged since 1982 and practically since 1993; and that it identified two ASRs. Alterations justified by exceptional circumstances (TPA/2 paragraph 1.6 – 1.7) are legitimate and sound.
- 4.3 GB1 was jointly commissioned. It is a strategic approach and justified as such but qualified insofar as it states (1.3.3) that it is only one piece of evidence, broad based and at a strategic level (5.3.1). TPA/2 reflects that the study was not intended or expected to be exhaustive – not only in respect of small scale boundary changes but also the precise definition of revised boundaries generally (GB1 8.1.5) . The two strategic and two small scale sub areas it identified in Welwyn Hatfield are demonstrably insufficient to meet the Council’s need for housing and employment.
- 4.4 TPA/2 sets out criteria plus consideration of coalescence. These ignore that development itself creates a boundary which can be durable – the existing green belt largely follows the built up edge.
- 4.5 The limited number of sites at this level of sieve explicitly did not trigger a Duty to Co-operate request. Proposed changes are an expedient. They do not meet the needs of this Plan and by definition cannot be durable beyond its (limited) horizon.

Do the proposed revisions to GB boundaries result in stronger boundaries that will endure well beyond the life of this plan?

- 4.6 No, insufficient consideration has been given to the likely level of development needs after the plan period, or indeed the implications of what appear to be more recent evidence on increased migration pressures into the area.

MATTER 5 – GREEN BELT EXCEPTIONAL CIRCUMSTANCES

What should constitute exceptional circumstances for removing land from the GB?

- 5.1 It is recognised that in this case the Green Belt is a policy that indicates the OAN may not be met, this can only be the case where the Duty to Cooperate has been engaged and these unmet needs are known to be accommodated elsewhere. The Duty has not been engaged and there are proposals to amend the Green Belt boundary. As such these amendments determined by the quantity of land required to meet OAN should be sufficient to endure beyond the plan period (Framework paragraph 83). In these circumstances planning for a low OAN based upon dated evidence, unduly influenced by the last recession, and underestimating the impact of London is clearly unsound.
- 5.2 The Framework clearly states (paragraph 84) that when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development and where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.
- 5.3 In light of the up to date evidence Policy SP2 is considered unsound for the following reasons:
- It is not positively prepared – the chosen strategy does not seek to meet objectively assessed housing requirements in a sustainable way furthermore it fails to address the unmet needs requirements from neighbouring authorities notably London and St Albans.
 - The policy is not justified – it is not the most appropriate strategy, when considered against the reasonable alternatives, in this case a more diverse pattern of allocations would meet the objectives of the framework by not delaying the provision of housing as proposed in the phasing element of PS2.
 - The policy is ineffective – this policy is not based upon effective joint working on the cross-boundary issue of housing demand and need.
 - The policy is inconsistent with national policy – the plan does not enable the delivery of sustainable development in accordance with the policies in the Framework as it fails to deliver the Objectively Assessed Housing Need.

Ensuring permanence of new green belt boundaries

- 5.4 The future level of planned housing provision does not only have an impact on the immediate requirement for housing sites to be allocated but also on the setting of longer term boundaries to the Green Belt.
- 5.5 It is agreed that exceptional circumstances exist to justify Green Belt review however the resulting boundaries should endure for the long term and not require further review at the end of the plan period.
- 5.6 Clearly the likely housing requirements post the plan period are more uncertain, however projections suggest that the modelled levels could continue. An appropriate response would be for the plan to at least exclude from the Green Belt sufficient land to accommodate a further 5 years’ worth of building i.e. some 5,000 dwellings.
- 5.7 Assuming a net to gross ratio of 75% and a density of 35 dwellings to the hectare this would suggest a total of some **107 hectares of land**.

Flexibility within the plan period

- 5.8 As this report illustrates the implications of new evidence and indeed new methodologies and guidance as to how the country is seeking to address the housing crisis can result in substantial changes to the level of housing that maybe required to be planned for in a particular location.
- 5.9 Framework paragraph 14 requires plans to be flexible and able to respond to such changes. As currently drafted the plan is unable to respond to the most recent DCLG projections let alone the LPEG approach to assessing FOAHN.
- 5.10 While the provision of safeguarded land outside of the green belt maybe a response to this any increase in the level of housing requirement would require a full plan review which is both costly and time consuming.
- 5.11 The recommended change to the NPPG by LPEG is that plans should allocate reserve sites to accommodate a further 20% of their FOAHN in order that this test of flexibility be adequately addressed.
- 5.12 This would require Policy SP2 to be amended to identify a further 4,100 dwellings on reserve sites that could be brought forward to meet additional need should it be necessary.
- 5.13 The SPRU Reg19 report on OAN set out proposed changes to Policy SP2 to achieve soundness these are replicated in appendix 1.

Has the choice of land to be lost from the GB been objectively derived?

- 5.14 The choice of housing sites has not been fully objective within that context. Sites Wel1, Wel2 and Wel15 are *reasonable alternatives*. So is WGr3. Where additional sites are needed and the Duty to Co-operate hasn't been exercised the Green Belt should be amended to accommodate the need.

APPENDIX 1: PROPOSED CHANGES TO POLICY SP2

Policy SP2 should be rewritten as follows:

Targets for Growth

The Council will support levels of employment, housing and retail growth which are consistent with the vision and objectives of this strategy and the principles of sustainable development as follows:

294.1 hectares of employment land have been identified to maintain a sufficient supply of jobs in the borough and provide the opportunity for new employment floorspace to be provided between 2013 and 2032, allowing for flexibility in the face of economic changes. Provision will be made for at least 116,400 sqm of new floorspace for industry, offices and warehousing over the plan period from designated employment areas and mixed use sites including the strategic development site at Marshmoor, Welham Green as set out on the Polices Map.

*Opportunities have been identified in and around the towns and excluded villages to facilitate the delivery of a borough-wide housing target of around ~~42,000~~ **20,520** dwellings between 2013 and 2032, as set out in the Settlement Strategy. **In addition, a sites for a further 20% (4,100 dwellings) will be identified and safeguarded. These will only be brought forward to address issues of 5 year land supply shortfall or changes in the level of objectively assessed housing need. The overall target will be phased over the plan period at the following rates:***

~~2013/14 to 2021/22: 4,485 dwellings (an average of 498 dwellings per annum);~~

~~2022/23 to 2031/32: 7,515 dwellings (an average of 752 dwellings per annum).~~

Through the provision of a net increase of around 330 bed-spaces for specialist (Use Class C2) residential or nursing care between 2013 and 2032

~~Through the delivery of around 1,350 new dwellings and associated development to the east of Welwyn Garden City, within the administrative area of East Herts. This will act as an extension to Welwyn Garden City and help to meet the need for housing within East Herts and within the Welwyn Hatfield Housing Market Area.~~

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