
Welwyn Hatfield Local Plan – Stage 2 Hearing Statement on behalf of the Royal Veterinary College (RVC)

October 2017

0. Introduction

0.1. This statement is a submission to the Welwyn Hatfield Local Plan Stage 2 Hearings on behalf of the Royal Veterinary College (RVC).

0.2. The RVC has land holdings in Welwyn Hatfield Borough to the north of Potters Bar and near to Brookmans Park, including its campus located on Hawkshead Lane.

0.3. The RVC has been an important part of the local community in Welwyn Hatfield for many years including as an education provider, local employer and land owner. Given the significant need for housing locally, including affordable housing, the RVC has identified three sites forming part of its estate that have potential to provide new homes and assist with increasing the local housing supply. Two of the sites, HS24 (Little Heath) and HS22 (Brookmans Park) are proposed allocations within the Local Plan proposed submission whilst the third, known as BrP6 on the edge of Brookmans Park, is not currently proposed to be allocated.

0.4. In this context we wish to make the following comments in relation to the Inspector's questions for the Stage 2 Local Plan Hearings. We do not plan to participate in the Stage 2 discussion, but would request that the information in this statement is taken into account by the Inspector.

0.5. Further information will be submitted in relation to subsequent examination stages and we may also wish to participate in subsequent discussions.

1. Housing Market Area

(a) What is an appropriate HMA on which to base objectively assessed need calculations for this LP.

(b) Has the Council used an appropriate area?

1.1. We do not seek to make any specific comments on this matter.

2. Full Objectively Assessed Housing Need

(a) Are the Council's successive forecasts of housing need robust and reliable?

2.1. In relation to the Council's approach to the identification of the area's Full Objectively Assessed Housing Need (FOAHN) we would highlight the requirements of paragraph 47 of the NPPF, in particular the requirement for local planning authorities to "use their evidence base to ensure that their Local Plan

meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'.

- 2.2. The Council has published a Strategic Housing Market Assessment (SHMA) with a number of updates, most recently in May 2017, alongside the Local Plan proposed submission. The SHMA objectively assesses the need for market and affordable housing within Welwyn Hatfield and the Welwyn Hatfield Housing Market Area. The original 2014 report identified that the objective assessment of need for Welwyn Hatfield was in the region of 625 dwellings per annum. The 2015 update to the SHMA revised the objectively assessed need for Welwyn Hatfield upwards to up to 707 dwellings per annum and most recently in 2017 this requirement has been identified as at least 793 dwellings per annum, rounded to 800 dwellings per annum.
- 2.3. It is noted that the Council has identified, in draft Policy SP2, an overall target of 12,000 homes during the Local Plan period (2013 – 2032). The overarching strategy to housing delivery is a phased approach with 498 dwellings per annum to be delivered up to 2021/2 and 752 dwellings per annum thereafter, leading to an average annual housing figure of 632 dwellings per annum.
- 2.4. Whilst we recognise that the Council is planning for an increased level of housing, including allocating land for development in the Green Belt, we consider that the overall level of housing delivery set out in the Local Plan, below the OAN level, is not fully compliant with national policy and should be addressed as part of the Local Plan examination process through the identification of additional sites for development.
- 2.5. Evidence of recent under provision of housing shown in the housing trajectory between 2013/14 – 2016/17 also suggests a need to plan for higher levels of housing growth than currently shown.
- 2.6. For the Local Plan proposed submission to be positively prepared, justified and consistent with national policy - i.e. sound - it is important that the Council plans to meet its OAN in full and it should identify sufficient sites that are deliverable to meet that need. The Council should also review its approach to the phasing of its housing requirement to ensure sufficient development is brought forward in the first half of the plan period.
- 2.7. Should it be considered as part of the forthcoming examination process that the Council should allocate additional sites to meet the OAN, including increasing the provision for housing during the first half of the Local Plan period, we confirm that site BrP6 remains available as a potential development site. The site has the potential to be delivered within 5 years.
- 2.8. As referred to in previous consultation responses, Sites HS22 and HS24, which are allocated for development in the Local Plan, have the potential to make a contribution to meeting the OAN and can be brought forward for residential-led development to include the necessary supporting infrastructure. Site HS24 in particular has the potential to be delivered within 5 years.

(b) Is its methodology for calculating FOAHN sound?

- i. Demographic forecast of households – Is it unduly influenced by untypical historic circumstances?*
- ii. Economic adjustment.*
- iii. Market signals.*

2.9. We do not seek to make any specific comments on this matter.

(c) Are the FOAHNs being met within the relevant HMAs?

2.10. We do not seek to make any specific comments on this matter.

(d) Is the assessment and provision for affordable housing sound?

2.11. We do not seek to make any specific comments on this matter.

3. Employment forecasts

(a) Are the employment forecasts and targets appropriate?

(b) Are they unduly influenced by one-off historic circumstances?

3.1. We do not seek to make any specific comments on this matter.

4. Green Belt Review

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

4.1. Welwyn Hatfield Borough Council, St Albans District Council and Dacorum Borough Council jointly commissioned a Strategic Green Belt Review in 2014. Following the publication of the Strategic Housing Land Availability Assessment (SHLAA) in 2014 a Stage 2 review was carried out to assess sites identified in the document and subsequently 10 additional sites were assessed in 2016.

4.2. The Council sets out its approach, its settlement strategy and Green Belt boundaries in policy SP3 of the Local Plan proposed submission; the Council is seeking to maintain the Green Belt boundaries through the plan period and direct new development towards the two largest towns.. We support the spatial approach taken by the Council to preserve the Green Belt and, where justified, the selective release of sites from the Green Belt as a result of the Green Belt Review.

4.3. Whilst we broadly accept and support the findings of the Green Belt Review (including in relation to Sites HS22 and HS24) we would highlight instances where the findings of the appraisal are at odds with the assessment methodology and by way of example we refer to site BrP6. The following description of the site is contained in the WelHat Green Belt review stage 2:

'The site is located to the south west of Brookmans Park and comprises agricultural land. It contributes significantly to one of the four national Green Belt purposes assessed and is significant to the local purpose. The site has high levels of visual and physical openness. The site is located within a strategic gap between 1st tier settlements. The site is assessed as significant for national purpose 3 as it exhibits

strong countryside characteristics, high levels of visual openness and is free from encroachment / development. The site is rated as significant to the local purpose because it makes a major contribution to the gap between Potters Bar and Brookmans Park. Overall the site is clearly defined by strong boundaries. The site is part of a larger group of sites with BrP9 and BrP10. In combination with other sites around Brookmans Park and Welham Green, this site could have a substantial impact on the strategic gap between Potters Bar and Hatfield.'

- 4.4. The Green Belt appraisal scores the site as contributing significantly to 'safeguarding the countryside from encroachment'. However, the Green Belt appraisal methodology clearly states that if.... 'Urban fringe elements dominate, e.g. the site is surrounded or part surrounded by urban form', then this would result in an assessment of 'limited or no' contribution.
- 4.5. Brookmans Park is a dominant adjacent urban element and therefore the scoring of the site as contributing 'significantly' does appear at odds with the methodology. It is considered that a score of 'partial' would appear to be most appropriate, acknowledging some countryside characteristics but also acknowledging the influences of the adjacent settlement and major transport route.
- 4.6. The site when assessed individually could, with considered mitigation measures, accommodate housing development with only limited effects on landscape character, the gap between Brookmans Park and Potters Bar and the Green Belt. A new woodland belt adjacent to Hawkshead Road and coinciding with the ridgeline would provide a strong new green belt boundary. Visual impact would be localised, restricted chiefly to the adjacent residential development. Therefore we consider that the exclusion of Site BrP6 from the Local Plan proposed submission on the basis of impact on the Green Belt is not justified.

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

- 4.7. With particular reference to sites HS22 and HS24 (both within the ownership of the RVC) there is the opportunity to establish strong Green Belt boundaries building up and managing existing, mature landscape features. In the case of site HS22, Brick Kiln Wood, an existing area of woodland, will provide a legible and strong green belt boundary to the west of the site and for site HS24 an existing copse and hedgerow, featuring established chestnut trees, at the northern boundary, with additional management, will provide a strong green belt boundary for the site.
- 4.8. With reference to site BrP6, should this site be identified through the examination process as an additional site to help meet the housing needs for Welwyn Hatfield, there is the potential to create a strong new green belt boundary through the establishment of a new woodland belt adjacent to Hawkshead Road which would coincide with the ridgeline. BrP6 when assessed individually could therefore, with considered mitigation measures, accommodate housing development with only limited effects on landscape character, the gap between Brookmans Park and Potters Bar and the Green Belt. Due to the topography of the site visual impact would be localised, restricted chiefly to the adjacent residential development.

5. Green Belt exceptional circumstances

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

5.1. In paragraph 82 of the NPPF it is stated that “once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”.

5.2. The Council’s case for exceptional circumstances relates to the scale of the need for housing and employment land, which cannot be met within the urban areas, and the social and economic consequences of not addressing need as far as possible; we support the Council’s case for exceptional circumstances and the selective release of sites from the Green belt for development.

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

- i. **Housing.**
- ii. **Employment.**

5.3. We do not seek to make any additional comments on this matter. Please refer to Section 4 above.

6. Spatial Vision and Settlement Strategy

(a) Do they reinforce the Garden City and New Town heritage of the Borough, whilst maintaining the area’s distinctive character?

6.1. The Council sets out its spatial vision and settlement strategy in policies SP1, SP2 and SP3 of the Local Plan proposed submission, and through the various topic specific policies relating to each settlement and the Green Belt. The spatial vision for the borough seeks to ensure Welwyn Hatfield continues to be a vibrant and culturally rich place where people choose to live, work and spend their leisure time. This will be achieved by directing development principally to the two largest towns and to other areas in accordance with the settlement hierarchy.

6.2. We support the spatial vision and settlement strategy as set out by the Council.

(b) Is the strategy being advanced consistent with the Borough’s GB location?

6.3. We support the spatial vision and settlement strategy as set out by the Council.

(c) Is the strategy now being advanced really one that seeks to maintain the existing pattern of settlements?

6.4. We support the spatial vision and settlement strategy as set out by the Council.

6.5. Brookmans Park is categorised a “large excluded village” in the settlement hierarchy included with the Local Plan submission draft; a large excluded village contains large service centres (shops and facilities serving the community needs) but a more limited range of employment opportunities, accessibility to the main road network is good and there are opportunities for sustainable transport (rail/bus).

6.6. Brookmans Park has access to a wide range of services, facilities and public transport, and the Royal Veterinary College's Hawkshead Campus is also located close to the village to the west. The village has an ageing population but development has the potential to maintain the vitality and viability of the village centre and improve the choice of housing to cater for the needs of the local community.

6.7. With an appropriate level of new development additional social infrastructure could be provided in Brookmans Park and existing facilities could be enhanced and reinforced. Brookmans Park therefore represents a sustainable location to accommodate growth and in fact could accommodate additional growth beyond that currently identified in the draft Local Plan.

7. Targets for growth

(a) *Are they appropriate?*

i. ***Employment – What are the ramifications of the loss of employment floorspace to dwellings for future levels of employment?***

7.1. We do not seek to make any specific comments on this matter.

ii. ***Housing – Are the constraints imposed by infrastructure requirements fully justified?***

7.2. The Council sets out its targets for growth in policy SP2 of the Local Plan proposed submission; the overarching strategy to housing delivery is a phased approach with 498 dwellings per annum to be delivered up to 2021/2 and 752 dwellings per annum thereafter, leading to an average annual housing figure of 632 dwellings per annum. The Council acknowledges that the housing figures identified in the plan fall short of the OAN. For the Local Plan proposed submission to be positively prepared, justified and consistent with national policy - i.e. sound - it is important that the Council plans to meet its OAN in full and it should identify sufficient sites that are deliverable to meet that need.

7.3. Whilst we acknowledge that the Council is planning for an increased level of housing, we consider that the overall level of housing delivery set out in the Local Plan is not fully compliant with national policy and this should be addressed as part of the Local Plan examination process through the identification of additional sites for development.

7.4. Primary education capacity is cited as a constraint impacting housing delivery; it is considered that this approach is not in accordance with guidance contained within the NPPF. However, it is acknowledged that there will be capacity issues for the existing primary school in Brookmans Park should site BrP6, alongside already identified sites in Brookmans Park, be developed. It is important to highlight the opportunities that exist to plan for and include an expanded primary school at Brookmans Park, such as the potential at Site HS22 (also in the RVC ownership) or as part of the delivery of BrP6. This would provide for existing needs, alleviate possible issues with the existing school site in terms of capacity to expand as well as provide for additional growth that would include site BrP6. Therefore, the reliance on education as a constraint that restricts housing delivery is not supported, particularly given the opportunities that exist to enhance primary school provision in connection with new development.

8. Five Year Land Supply Are the Council's assumptions sound?

(a) Are the Council's assumptions sound?

8.1. We do not seek to make any specific comments on this matter.

(b) Is the proposed windfall allowance appropriate?

8.2. We do not seek to make any specific comments on this matter.

(c) Is the proposed split housing trajectory sound?

8.3. Paragraph 47 of that NPPF emphasises the importance of boosting significantly the supply of housing and sets out actions LPA's should take to achieve this, summarised as follows: ensure that the Local Plan meets the full OAN; identify a supply of deliverable sites to provide 5 years' worth of housing with a buffer moved forward from later in the plan period (5% or 20% to address record of persistent under delivery); identify sites to come forwards later in plan period; illustrate delivery through a housing trajectory and set out approach to density.

8.4. To reiterate this point Paragraph 035 Reference ID: 3-035-20140306 of the NPPG states that LPAs should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate.

8.5. The approach taken by the Council seeks to phase and weight the delivery of housing to the latter stages of the plan period. It would appear that the split approach to the housing trajectory does not fully comply with the NPPF and the NPPG.

8.6. Furthermore, the latest Annual Monitoring Report published by the Council in January 2017 provides evidence of recent under provision of housing shown in the housing trajectory.

8.7. Given the evidence of recent under delivery, as well as national policy and guidance it is considered that a split housing trajectory may be unsound in this case and the Council could review its approach to the phasing of its housing requirement to ensure sufficient development is brought forward earlier in the plan period to address local housing needs.

8.8. Proposed allocated sites HS22 and HS24 have been identified in the housing trajectory (Fig. 17 of the Local Plan proposed submission) as completions starting in 2021/2022 and continuing for four years and two years respectively and will both contribute to meeting the OAN; it is worth noting that HS24 is a relatively unconstrained site and could be brought forward earlier than this.

8.9. Should additional sites be identified through the examination process, Site BrP6, on the edge of Brookmans Park, is also a deliverable and relatively unconstrained site and represents an opportunity to help address the shortfall in housing supply, particularly over the first 5 year period of the Local Plan and help the Council plan for meeting the OAN.

(d) Could the proposed housing development strategy result in a five year supply of housing land?

8.10. The strategy for delivering housing is set out in Fig. 17 of the Local Plan proposed submission. If the Inspector considers that the split approach to housing delivery is sound then the trajectory as submitted sets out how 2,490 dwellings will be delivered in the first five years (2017/2018-2012/2022) against an initial target of 3,032 dwellings (498 dwellings x 5 years), and the proposed strategy would result in a five year supply of housing land. However, should the Inspector consider that the split approach is not consistent with national policy but the overall target of 12,000 dwellings is correct and a average target of 632 dwellings per annum was considered appropriate (12,000/19 year plan period) then the housing trajectory as submitted would fall short of providing five years' worth of housing land. This would also support additional allocations for sites that can be brought forward early in the Local Plan period.

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

9.1. Paragraph 182 sets out the soundness test; in order for a plan to be considered "sound" it must be positively prepared, justified, effective and consistent with national policy.

9.2. In light of this we would reiterate the requirements of paragraph 47 of the NPPF, in particular the requirement for local planning authorities to *"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period"*.

9.3. Whilst we acknowledge that the Council is planning for an increased level of housing, including allocating land for development in the Green Belt, we consider that the overall level of housing delivery set out in the Local Plan, below the OAN level, compounded by the disparity between the first phase of housing over the plan period versus the second period, is not fully compliant with national policy and should be addressed as part of the Local Plan examination process through identifying additional sites for development.

9.4. For the plan to be positively prepared, justified, effective and consistent with national policy - i.e. sound - it is important that the Council plans to meet its objectively assessed need (OAN) in full and it should identify sufficient sites that are deliverable to meet that need. The Council should also review its approach to the phasing of its housing requirement to ensure sufficient development is brought forward in the first half of the plan period.

9.5. Should it be considered as part of the examination process that the Council should allocate additional sites to meet the OAN, including increasing the provision for housing during the first half of the Local Plan period, we confirm that site BrP6 remains available as a potential development site.

9.6. As referred to in previous consultation responses, Sites HS22 and HS24, which are allocated for development in the Local Plan, have the potential to make a contribution to meeting the OAN and can be brought forward for residential-led development to include the necessary supporting infrastructure.