

Examination of the Welwyn Hatfield Local Plan

Council's Hearing Statement for Matter 2

Overarching Strategy: Q9 Overall Development Strategy

9 October 2017

(For Hearing Session 24-26 October 2017)



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

Welwyn Hatfield Response

- 9.1. Yes, the overarching development strategy meets the Test of Soundness as set out in the NPPF for the reasons set out below.

Positively prepared

- 9.2. The Council has positively sought to meet objectively assessed development needs and infrastructure requirements where it is reasonable to do so and consistent with achieving sustainable development. It has rigorously evaluated the opportunities to meet those needs based on best practice guidance set out in the Planning Practice Guidance.
- 9.3. The strategy has resulted from first looking for opportunities on brownfield land then green field sites within all the borough's existing urban areas (towns and excluded villages).
- 9.4. In accordance with the NPPF, the Council has considered whether there are exceptional circumstance for a review of the Green Belt boundaries and carried out a review of the Green Belt. The Council concluded that the borough's washed-over Green Belt villages and other Green Belt settlements should remain within the Green Belt but that there might be opportunities for infill development in accordance with paragraph 89 of the NPPF. The Council has further reviewed the opportunities for urban and village extensions, then new settlements.
- 9.5. It has positively planned for the provision of new infrastructure, identified proposals and where appropriate allocated sites for that provision. Where there are no current solutions the Council has indicated that this will be the subject of an early review. It has secured agreements with a number of Duty to Cooperate bodies to this effect.
- 9.6. The Council has used its evidence base to produce a strategy which significantly boosts the supply of housing identifying locations for development in sustainable locations. The 2005 District Plan contained a target of 280 dwellings per annum whilst this Plan contains the equivalent of an annual target across the whole plan period of 632 dwellings per annum, albeit that it is staggered to allow for the provision of necessary infrastructure to support new development.
- 9.7. The Council consider that a higher target would be contrary to a number of policies set out in the Framework, is not justified by the evidence and would not result in an effective strategy.

Justified

- 9.8. The Council considers that the overall development strategy set out in the Local Plan is the most appropriate strategy when considered against the reasonable alternatives. Section 4 of the Overview Topic Paper (TPA/1) describes the evolution of the strategy for growth and the different options which have been considered for its distribution.
- 9.9. Both the Sustainability Appraisal and responses to consultation indicated that a dispersed pattern of development, with each settlement receiving a scale of growth proportionate to its size and function as set out in the settlement hierarchy, would be

the most sustainable pattern of development (where there are suitable opportunities to do so). This has formed the basis for the strategy set out in the Plan.

- 9.10. Other approaches have been considered (Overview Topic Paper TPA/1) but these would not have delivered the level of growth set out in the Plan and nor would they have been consistent with the objective of maintaining the settlement pattern.
- 9.11. In accordance with paragraphs 14 and 84 of the NPPF the Council has considered whether there are exceptional circumstances for altering the Green Belt boundaries; and having decided that such circumstances do exist, carried out a qualitative assessment of the impact of the harm on the openness and purposes of the Green Belt at both a strategic level and a site specific level.
- 9.12. As set out in the Council's response to Q4 to this Hearing stage, it is not possible to identify a sufficient supply of sites on land which performs only a 'limited or no' or a 'partial' role against the purposes of the Green Belt or which would meet the settlement strategy and the approach to the distribution of growth.
- 9.13. The Council has therefore had to consider whether the harm to the Green Belt outweighs the benefits associated with achieving sustainable development by bringing forward other suitable sites. In drawing these conclusions, the Council has taken into account the results of the Green Belt purposes assessment for both the strategic parcels and the sites. It has also taken into account the fragility of the gap between settlements, whether the site is located in a strategic, primary or secondary gap and any impact on visual openness. In some instances, the Council has concluded that the harm does not outweigh the benefits.
- 9.14. Other environmental constraints have also been taken into account, such as flooding and the impact on the natural and historic environment, and development has been directed to areas of least environmental value.
- 9.15. The ability to deliver the necessary supporting infrastructure has been influential in shaping the strategy. Paragraph 7 of the NPPF indicates that the provision of infrastructure is a key component of sustainable development and there are a number of further more specific references to the importance of delivering different types of infrastructure whether it be physical, social or green. Further, paragraph 70 of the NPPF requires that an integrated approach is taken to the location of housing, economic uses and community facilities and services. The results of consultation indicate that the ability to deliver sufficient infrastructure is one of the major concerns of residents associated with growth and is key to delivering good quality development. The strategy seeks to ensure that the right level of provision will be in place at the right time and in the right locations to support growth.

Effective

- 9.16. In order to be effective the Plan has to be deliverable over its period. The Council has worked with a number of service providers in order to understand the infrastructure issues associated with differing levels and locations for growth, the potential solutions and their viability.
- 9.17. The need to make appropriate provision of education has played an important part in shaping the options for growth. The Council considers it important that, wherever possible, provision should be made within the community within which the need arises. The reasons for this are twofold, firstly; it reduces the need to travel and secondly, primary schools can provide an important facility for the whole community, thereby making an important contribution to the social dimension of sustainable development. This is particularly important in the villages as

they tend to be less well provided for with public transport and travelling between villages or between villages and towns to access alternative provision is likely to be car related.

- 9.18. Whilst the County Council as the Local Education Authority has responsibility for ensuring there are sufficient school places, all new schools are required to be Free Schools. Economies of scale mean that 2FE primary schools are more viable than smaller schools and for the same reason tend to produce better educational outcomes and therefore are likely to prove more attractive to prospective providers. The County Council have advised that 500 dwellings equates to 1FE at both primary and secondary level.
- 9.19. Appropriate provision can be made for secondary school places, with capacity for 18FE being provided at two new schools. A modification to Policy SP14 is proposed to address this matter. Additional capacity will also be provided at existing secondary schools to make provision for demand emanating from growth in the existing population. A modification to the Urban Open Land policy (SADM17) will help to facilitate this programme of expansion.
- 9.20. Reference has been made during the examination for the potential for the County Council to make use of compulsory purchase powers to acquire sites for new secondary and primary school provision should this be necessary. The use of compulsory purchase powers has to be justified, takes time to put into place and is not guaranteed to be successful. These powers are more likely to succeed when a site has been allocated in an adopted Local Plan.

Consistent with national policy

- 9.21. The Council considers that the overarching strategy for growth sets out a strategy which will support the three dimensions of sustainable development in line with paragraph 7 of the NPPF. Whilst the Plan has not been able to make full provision to meet the OAN it has substantially increased the supply of housing on a range of sites around the borough which will support sustained growth in the borough's population and a continuation of affordable housing provision when compared to historic trends, an increase on more recent trends. It will also provide sufficient homes for a labour force to support potential economic growth in the borough alongside the provision for employment land on a range of sites. In accordance with paragraph 153 of the NPPF the Council has indicated that there will be an early review of the Plan which will allow the Council to work with others to address infrastructure issues.
- 9.22. Consistent with paragraph 152 of the NPPF, it is considered that significant adverse impacts on any of the dimensions of sustainable development have been avoided and for the reasons stated in the preceding paragraphs the Council considers that the plan is the best strategy for delivering sustainable development in the borough at the current time. Any delay in adopting the Plan would seriously impact on the delivery of planned housing growth with the necessary supporting infrastructure. The Soundness Self -Assessment Checklist (ORD/5) provides further information on how the development strategy is considered to meet National Policy.
- 9.23. The Council therefore considers that the overall development strategy is soundly based. However should the Inspector disagree the Council would be prepared to consider any modifications required to make it sound.