

Submission to Inspection in Public of WHBC Local Plan

Session 2

Q2 - Is the assessment and provision for affordable housing sound?

We argue that the Plan is unsound as it fails to react adequately to the need for more affordable homes, and aims to provide just 20% of the total homes as 'Affordable' versus the 76% that is the Council's own assessment of need within the life of the Plan.

We also offer some suggestions that would strengthen the commitment of the Council to meeting a higher target.

1. Assessed need for affordable homes

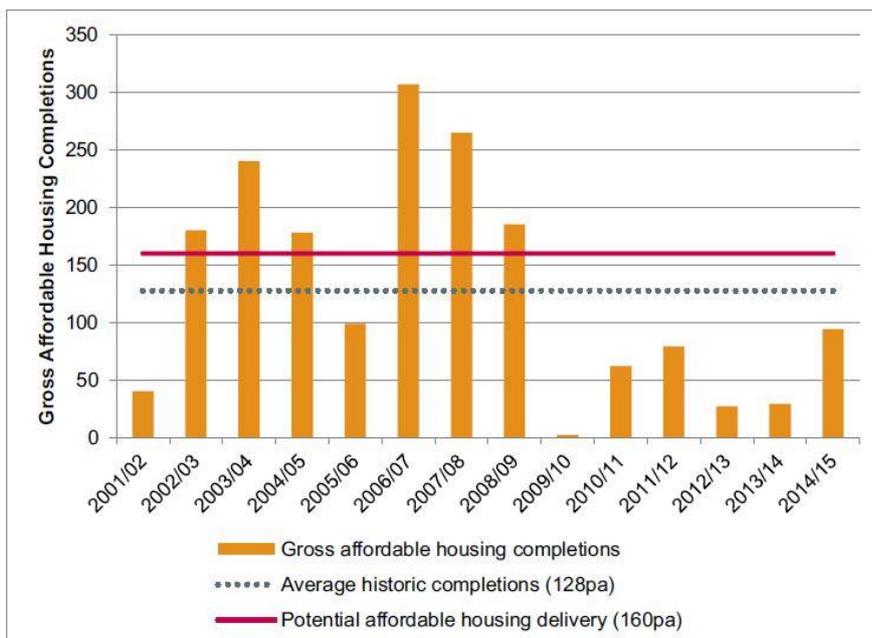
The Council's May 2017 report "Strategic Housing Market Assessment Update 2017" is very clear in its conclusion that Welwyn Hatfield is desperately short of affordable homes.

Paragraph 6.23 states that "...**818 affordable homes will be needed annually** in Welwyn Hatfield over the next five years, falling to 602 affordable homes per annum thereafter."

And Paragraph 6.25 goes on to say that "Meeting newly arising need throughout the plan period **would require some three quarters (76%) of all new housing delivered to be affordable.**"

However, Paragraph 6.26 seemingly ignores these conclusions and highlights the Council's aim in the Plan of 20% of all housing being affordable. It points out correctly that this is a significant improvement on recent delivery of affordable homes within the Borough, as shown in Figure 6.1 below:

Figure 6.1: Gross Affordable Housing Completions 2001 – 2015



Source: Welwyn Hatfield Borough Council, 2016

This does no more than highlight the Council's woeful recent record in providing affordable homes for its residents.

Paragraph 6.28 does say "it will be important for the Council to consider the benefits associated with higher levels of planned provision in supporting a greater level of affordable housing", and we believe that the Council does recognise the need, but it is not adequately reflected in the Local Plan.

Moreover, if one considers the Council's recent record of giving in to developers, even on strategically important sites, when faced with arguments about viability, it is extremely doubtful that they would be able to meet even the unambitious target of 160 affordable homes per annum.

2. Recent record of WHBC

As shown by the graph above, in the past 6 years the Council has seen an average of around 50 affordable homes delivered each year.

If we take one key example, a site which is included in the Plan and is strategically significant, it is instructive to note how easily the developer was able to get away with avoiding a commitment to the 30% requirement within the Plan at that location.

The development in question is the recent Spenhill application to build on the Broadwater Road West site SDS3. This was approved earlier this year and of the total of 850 homes, only 50 were committed to be affordable. This is probably the single biggest opportunity to secure a significant number of affordable homes for Welwyn Garden City and yet when faced with an entirely spurious viability assessment the council ignored the findings of its own consultants (attached is our summary of the viability arguments) and allowed the development to be approved.

There are caveats which the Council will point to, (1) that the development was in two phases, and the 50 homes were out of 350 in Phase 1 (14%), and there would be an opportunity at Phase 2 to insist on more affordable homes; and (2) that there were good reasons to push ahead with approval for development of a site that had already lain dormant in the centre of the town for far too long.

However, our argument is that there will always be reasons, whether political or pragmatic, to push ahead regardless, and it is therefore even more important to set targets that are ambitious, and to ensure that everything possible is done to meet them. A Plan whose assessed need is for 76% affordable homes, but which only aims to deliver 20%, is clearly failing to meet that need.

This has been underlined in recent days by the emergence of a new proposal for the site from its new owner, which proposes 1471 homes of which 450 will be affordable, demonstrating that a 30% target can be achieved.

3. Inconsistent approaches to Affordable Homes provision within the Plan

Within the Plan there are inconsistencies in the percentage of affordable homes required across the Borough. SP7 includes a table which shows a variation from 25% to 35% in the required proportion of Affordable Homes in any development of more than 11 new dwellings or over an area > 0.5 ha.

If there is a justification for this variation we have failed to find it, and believe that there is no reason for Hatfield to deliver less affordable homes than WGC. Given the above, we would argue that the proposed proportion is less than that required by the assessed need in any case.

4. Rural Exception Sites

We welcome the Council's desire to allow affordable homes to be added to smaller settlements when there is clearly a need, but we are concerned about the deliverability of such sites without government intervention in the process to ensure land prices are not inflated. In general, sites such as these will attract developers first and foremost to build higher priced homes, as they are by definition desirable locations. So unless there is a mechanism (Compulsory Purchase might be one) to ensure that land prices are not too high for affordable homes to be viable, they will never be built. We would also question the need to limit such developments to just four dwellings. We would also question the need to exclude mixed developments from such sites, which might help the overall viability and also be more in keeping with the garden city principles (see 14.6 point 3).

5. Proposed changes to the Plan

In light of the above we would ask the Inspector to seek changes from WHBC along the following lines:

1. Revision of the proportion of affordable homes to at least 35% in all parts of the Borough.
2. The Council should be acting to secure government support to build its own social housing, in mixed developments (garden city principle 3) but with a higher proportion of affordability, a minimum of [66%], in order to make a serious contribution to the current under-provision of affordable homes in the Borough.
3. The Council should revisit the Rural Exception Site policy to see what more can be done to provide a greater number of affordable homes in rural areas.