

## **Examination of the Welwyn Hatfield Local Plan 2013-32 Strategic Matters Overall**

### **Provision for Housing and Jobs:**

#### **Inspector's Preliminary Questions**

Having now read the Local Plan (LP) and much of the supporting information that relates to strategic matters, the Inspector is beginning to formulate the issues that may need to be discussed at the Hearing sessions and is coming to preliminary conclusions as to the areas of the plan that it may not be easy to find sound, either because of the nature of the supporting information or the lack of it. To assist the process, he has now asked me to write to you about your approach to the assessment and provision of Housing need and he has set out some questions. He would value your brief comments on these.

#### **Matter 2 – Overall provision for housing and jobs**

##### **Issue**

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing and jobs in the context of the Borough's Green Belt (GB) location.

##### ***Overall housing and employment provision***

- 1) The LP makes provision for 12,000 dwellings between 2013 and 2032 but the housing trajectory suggests that they will only be delivered at a rate of 498pa until 2022, with 752pa thereafter. The OAN evidence drawn from the Strategic Housing Market Assessments carried out in 2014, 2015 and 2016 indicate that between 12,500 and 13,433 dwellings were estimated to be needed in Welwyn Hatfield at those times. However, the SHMA update 2017, which uses the most recently published 2014-based Sub-National Household Projections suggests that 15,067 (rounded up to 15,200, 800dpa) are now required.
- 2) The spatial vision, which seeks to provide new employment opportunities and growth in the local economy, is supported in objective 12. In consequence the demographic projections assume a growing labour force supported by in-migration. Increased population and households require additional dwellings.
- 3) At the same time the Borough has insufficient land outside of the GB to accommodate even the growth in households attributable to its natural increase and the plan seeks to limit the release of land from the GB.
- 4) Government Policy says that local planning authorities should boost significantly the supply of land for housing and that they should ensure that their LPs meet the Full Objectively Assessed Housing need (FOAHN) for market and affordable housing within the HMA. It also says that significant weight should be placed on the need to support economic growth through the planning system and that Local Planning Authorities (LPAs) should plan proactively to meet the development needs of business.
- 5) At the same time the National Planning Policy Framework (NPPF) says that GB boundaries should only be altered in exceptional circumstances and when altered they should be capable of enduring beyond the plan period.

- 6) The SHMA update 2017 accepts that meeting the need for affordable homes in full would require an overall level of housing provision far in excess of that needed to accommodate the demographic growth in the population. However, it still proposes a substantial uplift in the dwelling requirement.

## **Questions**

### **HMA/FOAHNs**

- 1) How do the W/H HMAs relate to the Local Enterprise Partnership area(s)?
- 2) Have the FOAHNs in the W/H HMAs been reliably identified?
- 3) Are the FOAHNs, to be met in the submitted Local Plans within the respective W/H HMA's and within the other LPA's that contain a part of the W/H HMA's?
- 4) What are the implications of this level of housing provision in terms of overall population growth and migration patterns?
- 5) How much housing is intended to meet needs from beyond W/H?
- 6) How does this compare with past trends?
- 7) Is this amount fully justified?
- 8) What alternative scenarios were considered, particularly with regard to migration and job growth and household formation and why were the 12,000 and 15,200 figures chosen?
- 9) Does the evidence base clearly justify the provision of 15,200 houses between 2013 and 2032 (annual average 800)?
- 10) Does the evidence suggest that the plan will meet the FOAHN for affordable housing as required by the Framework?
- 11) If not why not?
- 12) If it would require an overall level of housing provision far in excess of that needed to accommodate the demographic growth in population to resolve the affordability problem, what is the justification for uplifting the 721 in the 2017 SHMA to 800?
- 13) Which households are expected to occupy these additional dwellings?
- 14) Why is a reduced proportion of affordable housing, required from housing for sale developments, proposed for Hatfield?

### **Housing provision**

- 15) There is a discrepancy between the proposed level of housing provision as compared with the FOAHN projection of housing need in W/H (with reference to the 2012-based household projections). Was the difference between the level of planned provision and this household projection justified? If so, how?

- 16) There is an even greater discrepancy in the case of the 2014 based household projections? Is it intended to meet the revised FOAHN through additional land releases? If not why not?
- 17) Is the assumed windfall allowance fully justified?
- 18) To what extent have past rates of windfall development been conditioned by the absence of an up-to-date adopted LP in recent years and a shortage of allocated sites for housing development?
- 19) What approach has been taken to ensure the meeting of any unmet needs from other authorities, particularly within the W/H LHMA? Is this justified?
- 20) How would the proposed level of housing compare with past completion rates?
- 21) How were options for housing provision assessed through the Sustainability Appraisal process? What was the outcome of the appraisal in terms of the relative merits of options? Were all reasonable options considered and appraised? Is the justification for the level of housing provision clear?
- 22) In overall terms is the level of housing planned appropriate and justified? Should the amount of housing planned be increased or decreased? If so to what level and on what basis?
- 23) In the context of the requirement to boost the supply of housing now, can the split housing trajectory be justified?
- 24) In an area with high land values and a history of major development occurring over a relatively short period of time, do infrastructure constraints really justify the approach taken?
- 25) To what extent is the part of Birchall Garden suburb within East Hertfordshire District intended to meet the housing needs of:
  - a) That part of the Welwyn/Hatfield LHMA within East Hertfordshire District?
  - b) That part of the Welwyn/Hatfield LHMA within Welwyn/Hatfield Borough?

### **Employment growth**

- 26) Are the employment projections sufficiently up-to-date?
- 27) What is the basis for planning for up to 16,900 new jobs? What options were considered and why was this figure chosen?
- 28) How does this compare with historic rates of job growth?
- 29) How does the rate of growth compare with rates used in similar nearby authorities?
- 30) What is the relationship between planned housing and jobs growth? How will this affect commuting and migration patterns?
- 31) If job growth potential is as buoyant as suggested, why is employment floorspace being lost to housing in significant amounts?

- 32) Is the overall level of job provision appropriate and justified? Is it realistic and what assumptions are made? What would be the implications of more or less jobs actually being created compared to the planned amount?
- 33) Can the forecasted job growth be realistically achieved without additional land/floorspace beyond that proposed being provided?

**Green Belt**

- 34) What are the current and long term overall implications for the GB arising from the assumed levels of economic growth?
- 35) Has a proper assessment of the contribution land within the GB makes to its purposes been undertaken?
- 36) Has the release of land from the GB been objectively derived? If so how?
- 37) Why has insufficient land been released from the GB to meet the established FOAHN's?
- 38) Why has there been no redrawing of the boundaries to ensure that they are capable of meeting long term development needs and endure well beyond the plan period?
- 39) What are the exceptional circumstances that justify amending the GB boundaries to the extent proposed?
- 40) To what extent has the option of diverting some of the proposed growth to locations outside of W/H Borough, where the loss of land from the GB is less critical or to locations beyond the GB been explored?

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