

Welwyn Hatfield Local Plan - Stage 1 Hearing Statement on behalf of the Royal Veterinary College (RVC)

September 2017

Introduction

- 1.1 This statement is a submission to the Welwyn Hatfield Local Plan Stage 1 Hearings on behalf of the Royal Veterinary College (RVC).
- 1.2 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.
- 1.3 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 draft Local Plan whilst the third, known as BrP6 on the edge of Brookmans Park, is not currently proposed to be allocated.
- 1.4 In this context we wish to make the following comments in relation to the Inspector's questions for the Stage 1 Local Plan Hearings. We do not plan to participate in the Stage 1 discussion, but would request that the information in this statement is taken into account by the Inspector. The response below relates specifically to questions 3 and 6.
- 1.5 Further information will be submitted in relation to subsequent examination stages and we may also wish to participate in subsequent discussions.

3. Has the DPD been subjected to Sustainability Appraisal? Are its conclusions sound and have they been taken into account in the DPD?

- 1.6 The Council has published a Sustainability Appraisal (SA) alongside the draft Local Plan. The SA considers the potential effects of proposed site allocations in the villages south of Hatfield including Brookmans Park and Little Heath. Site BrP6 (Land west of Bluebridge Road) is assessed within the SA as a 'reasonable alternative' site (paragraph 6.375). The positive impacts of allocating site including delivery of housing are identified, whilst some potential negative impacts are identified in relation to local distinctiveness and conserving and enhancing the Borough's character.
- 1.7 Technical and preliminary design information has been submitted on behalf of the RVC previously in relation to the suitability of Site BrP6 which could, with a high quality design approach, be developed without unduly impacting on the purpose of the Green Belt or the character of the local area. The site could provide an important contribution to the local housing supply as well as the required supporting access and community infrastructure.

- 1.8 In this context we do not fully agree with the findings of the SA in relation to the potential negative impacts of development at Site BrP6 and consider that should additional sites need to be allocated as part of the Local Plan process (see below), Site BrP6 would be a sustainable option.
- 1.9 The RVC does however support the SA's assessment in relation to sites HS24 and HS22 and is committed to bringing these sites forward for development to meet local housing needs together with necessary supporting infrastructure.

6. Has the DPD had regard to appropriate national policy?

- 1.10 Whilst we understand that the level of housing provision in the Local Plan will be considered in subsequent hearing sessions, 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"*.
- 1.11 According to the Council's 2015 Strategic Housing Market Assessment (SHMA), the Objectively Assessed Need (OAN) for Welwyn Hatfield is in the range 664 and 707 dwellings per annum (13,280 – 14,140 total). However, the SHMA update 2017 suggests that 15,200 or 800 dwellings per annum are now required.
- 1.12 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 overall housing figure is to be phased, 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.
- 1.13 The disparity in phasing is noted in the draft plan as relating to infrastructure and other constraints which affect lead in times for development. The draft Local Plan acknowledges that the housing figures identified in the plan fall short of the Objectively Assessed Need (OAN).
- 1.14 Whilst 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.
- 1.15 Evidence of recent under provision of housing shown in the housing trajectory between 2013/14 – 2016/17 also indicates a need to plan for higher levels of housing growth than currently shown.
- 1.16 For the plan to be positively prepared, justified 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.

- 1.17 In this context, Site BrP6 on the edge of Brookmans Park, which is a deliverable and relatively unconstrained site, represents an opportunity to help address the shortfall in housing supply, particularly over the first 10 year period of the Local Plan and help the Council plan for meeting the OAN.
- 1.18 As noted above, specific information has been submitted on behalf of the RVC previously in relation to the suitability of the site which could be developed without unduly impacting on the purpose of the Green Belt or the character of the local area.
- 1.19 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.
- 1.20 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.