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## Welwyn Hatfield Local Plan 2013-32

### Stage 3 Hearing Sessions

#### Matter 4 – Topic Specific Policies

#### Response on behalf of the Royal Veterinary College (RVC)

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##### January 2018

- 1.1 This Hearing Statement has been prepared on behalf of the Royal Veterinary College (RVC).
- 1.2 This document provides a response to Stage 3, Matter 4 – Topic Specific Policies of the Welwyn Hatfield Local Plan examination on behalf of the Royal Veterinary College (RVC). In general the RVC supports the Topic Specific Policies of the Local Plan and considers them to be sound. In this context there are a limited number of comments in relation to topic specific policies that are set out below.
- 1.3 The RVC has some concerns about the nature of site specific allocations and attached policies which will be further addressed at Stage 4.

##### **SADM 2 Highway network and Safety**

#### ***13. Should there be a continuation of the policy that restricts development in the rural parts of the Borough when it is likely to necessitate a change in the character of rural roads?***

- 1.4 The RVC supports the proposed distribution of housing growth and the work undertaken with Hertfordshire County to ensure the infrastructure implications of individual sites and different distribution options have been properly considered. A strategy that would constrain housing growth to sites within the borough's urban areas would mean that there would be a significant shortfall of housing, in particular when considered against the Objectively Assessed Need (OAN). Achieving sustainable development within the borough does rely on a balanced distribution of housing growth across the borough and can be effectively mitigated through development proposals.
- 1.5 The rural character of roads should not be something that drives the strategy for accommodating housing need when seen in the context of wider sustainability and spatial planning objectives. For individual development sites, determined to be in sustainable locations, the RVC considers that site specific responses, taking into account the highway network surrounding sites, will need to be developed through detailed design responses. We would promote close working with the Council and County Council in order to assess the impacts of development on a site specific basis through individual planning applications.

- 1.6 In this context the RVC is supportive of the Local Plan policy SADM 2 as drafted relating to highway network and safety. The RVC recognises that Policy SADM2 supports the implementation of the strategy for growth in the borough through Policy SP4.

### **SADM 3 Sustainable Travel for All**

***14. Is the policy, as currently worded, likely to be effective in achieving changes towards the use of more sustainable modes of travel through new development?***

- 1.7 New development can comply with the requirements of policy SADM 3, to support sustainable travel and ensure that residents of the new development will not be dependent on private car use. The measures to be included in each development need to be planned on a case by case basis and accordingly the flexibility of policy SADM 3 is supported.

### **SP 7 Type and Mix of Housing**

***33. Given the evidence base on housing need, shouldn't more than 50% of overall housing provision be provided as affordable housing?***

- 1.8 Affordable housing as part of mixed tenure developments is only likely to be delivered where the development is viable. Accordingly the level of affordable housing sought in policy should be at a reasonable and realistic level, also bearing in mind the significant need for other housing tenures in the local area. The level of affordable housing sought on individual sites should also take account of development viability as a material consideration. In this context Policy SP7 is supported.

***38. Are the housing mix policies too restrictive?***

- 1.9 In relation to housing mix, we note at paragraph 9.17 that the Local Plan states:

*The following tables are not intended to perform as a prescriptive policy requirement (they may be subject to review over time) but such indicators should be taken into account when submitting a planning application and in decision making.*

- 2.0 On the basis that Tables 4 and 5 are guidance, we do not consider that the housing mix policies are too restrictive.

**SP10 Sustainable design and construction*****63 Should the BREEM and Sustainable Homes ratings be quoted in this policy or its supporting text and should development be required to meet the higher level targets?***

- 2.1 Since the abolition of the Code for Sustainable Homes, energy performance of new residential development is primarily controlled through application of Building Regulation standard. We consider that it is unnecessary for Local Planning policy to introduce additional targets in respect of sustainable design and construction and the approach set out in the Local Plan is therefore broadly supported.
- 2.2 It is appropriate for policy to encourage sustainable design, the details of which need to be considered on a site by site basis, and policy SP10 is supported on this basis.

**SADM13 Sustainability requirements*****68 Should this policy require the achievement of the higher level Sustainable Homes targets?***

- 2.3 As above we consider that it is unnecessary for Local Planning policy to introduce additional targets and the approach set out in the Local Plan is therefore broadly supported.
- 2.4 It is appropriate for policy to encourage sustainable design, the details of which need to be considered on a site by site basis and policy SADM13 is supported on this basis.

**SP14 New Schools*****138. Does the plan make adequate provision for the increased educational capacity required to service the additional school population generated by the proposed development?***

- 2.5 Existing school capacity should not be considered as a barrier to planning for future housing growth in sustainable locations. The plan does not provide for the increased educational capacity required to meet the full OAN and associated need. The result is a reduction in housing requirement against OAN based on a restriction driven by education which should be brought forward with housing.
- 2.6 The provision of new housing is interlinked with that of social infrastructure. New residential development provides significant opportunities for new or enhanced primary and secondary school provision. Effective place making relies on the provision of social infrastructure that is phased appropriately with development. This should be recognised in policy in order to provide the most effective solution for new and existing residents. Education capacity should not be used as a constraint to the strategic growth strategy and the community opportunities provided by new or enhanced education facilities.