

Sent by email to: louise@poservices.co.uk

18/09/2018

Dear Sir/ Madam

Response by the House Builders Federation to the consultation on the Welwyn Hatfield Stage 3 Green Belt Assessment

The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. Outline below are our comments on the stage 3 Green Belt Assessment that has been prepared by the Council in response to the Inspector's concerns regarding the degree to which the Council have considered the impact of development sites on the Green Belt.

Our comments relate solely to the methodology used by the Council in its assessment and we have not considered this evidence in relation to any specific site or parcel. The two issues we have with regard to the Council's assessment are:

- The consideration that all land makes a significant contribution to purpose 5; and
- The inclusion of the 'local purpose' of maintaining the existing settlement pattern.

Approach to purpose 5

The stage 3 assessment acknowledges the in paragraph 3.43 that most greenbelt assessments do not assess parcels or sites against this purpose on the grounds that it is difficult to make a distinction between how one parcel contributes more to achieving this aim than another. It is also important to remember that the reason the Council has been required to consider development in the Green belt is due to the fact that it cannot meet its housing needs within its existing built up areas. This would suggest that the Council has examined the potential opportunities for development within the urban area and come to the conclusion that there are limited opportunities for further residential development through this plan. The Stage 3 report argues in paragraph 3.50 that in previous years a significant proportion of completions have been delivered on brownfield land and as such it is reasonable to assume the Green Belt makes a significant contribution to purpose 5. We would suggest that this is an inevitable fact and whilst it shows that Green Belt has achieved this aim it is inevitable that in many areas there is a dwindling stock of brownfield sites with which to meet needs and this is why Councils such as Welwyn Hatfield have

begun the process of amending Green Belt boundaries in order to support further development.

The inclusion of the 'local purpose'

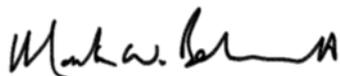
Whilst the Council acknowledge that this purpose is not given the same weight its continued inclusion on the assessment is a concern. In assessing any site against the purposes of Green Belt it is wholly inappropriate to consider other purposes for which there is no basis in national policy. The consideration of maintaining settlement patterns may inform site selection if the Council were meeting needs but it cannot be used as part of an assessment that is being used by the Council to justify not meeting its housing needs as required by national policy.

Conclusion

As highlighted in our representations there are clearly exceptional circumstances that will require the release of Green Belt land. The acuteness of housing need for both market and affordable housing and the poor affordability of accommodation clearly support the need amend Green Belt boundaries in order to meet housing needs in full. However, alongside these circumstances it will also be necessary to consider the overall scale of any losses from the Green Belt that will enable needs to be met in full. Given the sheer amount of land covered by Green Belt in Welwyn Hatfield the relatively minimal loss of Green Belt will mean the actual harm to the main aim of Green Belt, the prevention of urban sprawl, will be minimal. Therefore in using this evidence it will be essential that the impact of the actual reduction in the Green Belt as a whole is considered alongside the benefits of meeting housing needs. This is especially important in an area where there would be appear to no willing neighbouring authorities to meet unmet needs. Without appropriate amendments to Green Belt boundaries housing need will not be met.

We hope these comments are of assistance and should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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