

Mr Melvyn Middleton
c/o Mrs Louise St John Howe
Programme Officer – Welwyn Hatfield Local Plan
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Hertfordshire
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EMAIL

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Dear Mr Middleton

RE: LAND AT GREAT NAST HYDE, HATFIELD

Spawforths have been instructed by our client, Network Space, to make representations to the Council on their behalf, in respect of the site at Great Nast Hyde, Hatfield. These representations are made in response to the latest evidence published by the Council on 3 July 2019 in respect of Housing and Economic needs of the Borough.

The Inspector through the Examination in Public considers that further land should be identified for housing in order to meet the needs established through the latest evidence. The site(s) at Great Nast Hyde, Hatfield have been previously identified as a proposed allocation in the draft Core Strategy 2012 (Draft Land for Housing Outside Urban Areas). Furthermore, the sites are a small extension to Hatfield, which is a high order settlement within the Borough. The site(s) are eminently sustainable and deliverable, being owned by Network Space. This representation sets out the concerns of Network Space regarding the latest evidence in relation to housing and economic needs.

Housing and Employment Needs

National policy, both through the NPPF published in 2012 and the revised NPPF, 2019, is clear that plans should support economic growth building a strong and competitive economy (para 32, 80, NPPF 2019, Para 18 NPPF 2012). Furthermore, local plans should be positively prepared and positively seek opportunities to meet the development needs of their area, with sufficient flexibility to respond to

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changes (para 11 (NPPF 2019, Para 14 NPPF 2012). The Government's commitment to significantly boosting the supply of homes is expressed explicitly in national policy alongside the need to ensure that plans make a sufficient amount of land available where it is needed. (para 11, 23, 59, NPPF 2019, para 17, 47, NPPF 2012). **Network Space remain concerned that the Plan is not consistent with national policy in relation to boosting the supply of housing and supporting economic growth and these concerns have not been alleviated by the evidence published in July 2019.**

Network Space has previously made representations that the Council should identify a housing target that meets its full objectively assessed need. Network Space therefore welcomed the Inspector's questioning of the evidence in this regard and request for additional work. Network Space previously commented that the SHMA update 2016 identified a strong overall need for housing across the Housing Market Area, and noted the importance of the spatial relationship between Welwyn Hatfield and the Greater London Area with a potential displacement of need relating to a level of under provision in these areas. The SHMA update concluded that the upper end of the need figure, 707 dwellings per annum, is proportionate to the evidence of high housing need in Welwyn Hatfield, particularly the analysis of market signals evidence. Based on the OAN of 707 dwellings per annum the requirement, at the time, was 13,433 new homes over the plan period (2013-2032). The draft Plan sought to deliver 12,000 homes, which was significantly below the housing requirement. There was a distinct lack of justification to support the Council's position to not meet their needs for the plan period. Network Space therefore objected to the draft Local Plan on the basis:

- that the Council failed to plan to meet the housing needs of the area;
- failed to consider the effects of unmet need in neighbouring authority areas; and
- no evidence that a neighbouring authority will meet the unmet need.

Network Space sought that the Local Plan should identify sufficient sites to meet the full Objectively Assessed Need for housing within the plan period and further justification of the windfall allowance.

The Inspector raised concerns that if the Objectively Assessed Needs were not met in full that in-commuting would increase where provision for employment was made. Furthermore, the Inspector expressed concern that where employment growth outstrips housing growth such that the inflow of commuters increases this would not be sustainable. The Council have reviewed its evidence on employment need, housing need and carried out a further call for sites exercise, to clarify the need, the appropriate plan period and the potential capacity, although the latter is yet to be published. Whilst the additional evidence is welcomed, Network Space still has a number of concerns relating to the OAN

and the reflection of economic growth, and constrained economic growth. The following recently published documents have been considered in our response:

- EX102 Cabinet Planning and Parking Panel: Local Plan Economy Update
- EX102A Appendix A Local Plan Economy
- EX103 Cabinet Planning and Parking Panel Implications of the 2016 household and population projections.
- EX103 A Appendix A: The implications of the 2016 based SNPP and SNHP on the Welwyn Hatfield OAN
- EX 103B Appendix B Implications of the New plan period for the calculated housing need
- EX 103C Appendix C Role of the 2016 based household projections
- EX 104A Welwyn Hatfield Employment Land Technical Note – labour demand
- EX104 B Welwyn Hatfield Employment Land Technical Note – population based scenarios.

New Evidence Review

The Council's evidence in EX103 indicates that the OAN should remain at 800 dwellings per annum. This is a lower requirement than arising from the standardised methodology, which is 867 dpa and requiring an additional **3,054** allocations.

The new evidence considers a range of options in relation to the provision of new housing to be allocated in the Plan. This includes:

- Maintaining the current plan period, 2013-2032, with a need for an additional **2,449** dwellings;
- Extending the Plan period to 2035 with a need for an additional **3,715** dwellings; and
- Rebasing the plan period to 2016-2035 with a need for an additional **2,529** dwellings.

In all cases the Council is clear that further sites are required in order to meet the need for housing in full. The Council's evidence does not conclude whether they will rebase and extend the plan period, or extend the plan period. Network Space do not support maintaining the current plan period, as this would not be consistent with the framework, as less than 15 years of the plan would remain following adoption. Similarly, rebasing the plan period would not be prudent and would lead to short/medium term decisions on the release of Green Belt land, and not ensure that the boundaries are capable of enduring, contrary to the provisions of the Framework. Significantly, neither of these scenarios reflects the standardised methodology and the higher requirement that results.

Network Space is concerned that the OAN has only been adjusted for demographic and market signals, in relation to the historic suppression of household formation rates. However, the OAN has not responded fully to the identified need for economic growth and there is no uplift for affordable housing. **Network Space is extremely concerned with this approach, particularly as the evidence base presents differing and contradictory conclusions.**

Housing

The evidence in EX103 states that there is no uplift for economic growth due to the size of the labour force and its anticipated growth, which is considered sufficient to meet the forecast labour demand. Paragraph 6.14 indicates that employment growth can be supported through the demographic projection when the commuting ratio remains fixed. The report states that a ratio of 0.77 confirms that the Borough currently imports labour. The report goes on to state that between 18,107 jobs and 23,374 jobs could be supported over the plan period (to 2032). The hybrid economic forecast indicates a growth of 16,600 FTE's (all sectors). Therefore, this report concludes that the OAN can support the scale of growth in the local plan without increasing in-commuting and could reduce commuting. However, no further details are provided in relation to the potential extent of the reduction. Report EX103B derives a similar conclusion. **Network Space is therefore concerned that this evidence does not provide greater clarity, or sensitivity testing, in relation to commuting ratios and the degree of self-containment that should be achieved.**

Employment

Network Space is concerned that the evidence presented through EX104 seems to contradict the view expressed in EX103 and is therefore inconsistent and unsound.

EX104 has been prepared by AECOM and considers employment land requirements based on labour demand position and labour supply forecasts. For the period 2013-2032 the labour supply position indicates that 2016 population projections would support 3,120 FTE in B class uses over the plan period. However, this is significantly lower than the FTE forecasts for B Class use over the same period when considering the labour demand position:

- Experian forecast a growth of 5,500 FTE;
- East of England forecast a figure of 5,200 FTE;
- the hybrid forecast is 5,200 FTE.

Importantly, AECOM note that labour supply based employment land forecasts would be a minimum and would not reflect the needs of the economy and evidence from local market signals, needs of

businesses or local economy. According to the evidence presented in EX104 there is a significant mismatch between the number of jobs supported by population growth shown in the labour supply position and number of jobs forecast in a labour demand position. If as recommended the Council plan to meet the labour demand position then it is apparent that the OAN would need to increase to meet economic growth. Such an approach would maintain at least current ratios with a further uplift required to increase the boroughs self-containment. The difference in the number of jobs supported by labour supply and the number of jobs forecast through labour demand forecasts is still apparent when a 2018-2035 period is considered with a range of jobs as follows:

- Experian: 2,600 jobs;
- East of England: 4,900 jobs;
- Hybrid: 3,700 jobs;
- Labour supply: 1,970 jobs supply.

Network Space is therefore extremely concerned that the evidence base is showing that there needs to be an uplift in the OAN to deliver the economic growth aspirations. However, it appears the Council is adopting an approach which assumes future jobs are filled with residents of the Borough. This approach does not reflect the labour market position of Welwyn-Hatfield. **There is a need for the Council to clarify its position and its evidence.**

Network Space considers it would be inappropriate to plan for economic growth based on a labour supply position. This would not meet the needs of business and the economy and would not be consistent with the aims and objectives of the Framework.

In addition to concerns that the OAN does not reflect the demand for economic growth forecast. **On the basis of the review of evidence presented in EX102, Network Space is concerned that the level of economic growth forecast reflects a period of constraint, and as such there is a potential need to consider a further uplift in the employment land requirements.**

The paper on economic growth EX102 notes the content of the LEP report (March 2019) which discusses implications of losses of floor space over the last decade. This considers that economic growth in the area is being constrained, which is compounded by lack of available stock or suitability of stock. The level of growth based on Experian and East of England has fallen since the previous forecasts. Given the concerns expressed in the LEP report, it is also likely that the forecasts are projecting forward expected pattern of growth that is based on the recent period of constrained growth within the Borough. **Network Space therefore consider the proposed approach is unsound and could**

continue to lower growth in the Borough, which is contrary to the LEP and national guidance. Network Space consider that it would be prudent, and consistent with the aims of the 'Framework', to consider a position that seeks to address the LEP concerns that economic growth, both in the wider region and within the Borough, has been constrained by significant losses in employment land and reflect the potential of the Borough given its location/relationship with Greater London.

Spatial Strategy

The evidence reveals, even without addressing the above concerns, that there is a need for additional allocations within the Plan to meeting the identified need. **Network Space maintain, as expressed in earlier representations, that the focus of growth and the additional allocations should be towards Welwyn Garden City and Hatfield followed by smaller settlements.**

The Councils approach through policy SP3 is that the 'settlement strategy and hierarchy direct growth to the most sustainable locations, appropriate to the levels of existing infrastructure, services and facilities'. Network Space has stated previously that 'the approach taken by the Council is inconsistent with the Council's own aspirations and the requirements of the Framework in this respect'. The spatial strategy set out a dispersed pattern of growth. Network Space maintains that the towns and larger villages within the Borough represent the most sustainable locations for development. Network Space also stated that the strategy for housing development was inconsistent with the Plans approach in relation to employment development, which focussed development in the towns of Hatfield and Welwyn Garden City and the settlement hierarchy. This mismatch between the spatial strategy for location of housing growth and economic growth, foster unsustainable travel patterns within the Borough, and will result in development in locations which do not benefit from sufficient accessibility to strategic transport networks and public transport links in areas which have the greatest potential to maximise accessibility to job opportunities, services and facilitates contrary to the Framework.

Network Space would like to reiterate that the scale of development proposed in any settlement should be directly proportional to the sustainability of that settlement and its respective position in the settlement hierarchy. Hatfield should remain a focus of development reflecting the principles in Policy SP3, and this should be reflected within the new allocations rather than directing more development to smaller rural villages and to a new settlement at a scale that is too small to be sustainable.

Within that context Network Space previously commented that insufficient housing opportunities have been identified in Hatfield with only 8 allocations ranging from 14 to 1,650 dwellings. This level of

provision was insufficient to meet the needs of the area and provide for suitable market conditions going forward. Therefore, **Network Space** maintain that **HAT 19** and **HAT 3** should be allocated to ensure that local needs can be met in full in a sustainable location.



HAT19: Land off Bramble Road

This site forms an extension to Bramble Road and could accommodate circa 45 dwellings. This site scores highly in the Council’s Site Selection Methodology in June 2016 and was presented to Members as a potential option for allocation. The site fully accords with the criteria in the Framework for allocation being available, suitable and achievable and therefore deliverable. The Site Selection Methodology Paper states the site is deliverable, can come forward in five years, has strong defensible boundaries and scores positively in the sustainability assessment.

The only reason the Council cited originally for not allocating this site is the perceived narrowing of a gap between Hatfield and Smallford. This site is screened by mature trees and there would be little visual impact if the site were developed. However, the new Green Belt boundary is strong and defensible. Furthermore, the Stage I Green Belt Review (EX38) indicates that this site was part of parcel GB35 and noted that the parcel did not make a significant contribution to the Green Belt. This is reinforced by the LUC Green Belt Review March 2019 (EX99) that states HAT19 is contained by an existing dwelling to the north and south and it only forms a narrow strip of Green Belt land that would

not lead to the perception of significantly narrowing the gap between Hatfield and St Albans. The boundary of the site would be defined by access track to the west and existing field boundaries to the south east. The site is therefore identified as not essential to maintain within the Green Belt.

The site is entirely in the ownership of Network Space and as such is available and deliverable in the short term. There are no apparent constraints to the development of the site. Access can be achieved into the site off Bramble Road. Development on this site is achievable, based on the Council's own site assessment matrix. The site is also suitable, on the basis that the proposed development can make an efficient use of the land. Furthermore, the site represents an excellent opportunity for future housing being located within a sustainable residential location. The site would be within close proximity to both opportunities for outdoor sport and recreation and service and retail facilities and employment opportunities.

Given the Council needs to identify further land for housing this site should therefore be reconsidered.
The site should therefore be allocated.

HAT3: West of Ellenbrook

Network Space promoted the site through the Emerging Core Strategy, and **it was previously identified as a preferred site for residential development by the Council.**

This site provides an excellent opportunity to provide a sustainable urban extension to the south west of Hatfield, which will help to address the housing need in this area.

Therefore, as the Council need to identify further housing sites, this site should be reconsidered and allocated. The site provides a good opportunity to strengthen and provide a more robust Green Belt boundary than existing. The site will facilitate and strengthen linkage between the existing urban area and open countryside with the potential of new and enhanced pedestrian links and green routes. The site is highly accessible by public transport with two bus stops located just outside the site, giving access to local facilities, schools and employment.

Our previous representations have demonstrated the opportunities at the site, and these are illustrated in the site appraisal drawing:



New and existing landscaping will be used to reinforce the site boundaries and the setting of the Great Nast Hyde House will be preserved with screening and open space. Access to the site can be achieved via two access points. The main access will be off the Hatfield Road and the second access point is via Bramble Road.

Network Space has also developed a Masterplan Proposal for the site, which shows how development could integrate and enhance the urban edge of west Hatfield:



IPaD Ltd has assessed the access and highways options for the site. Access is taken off the A1057 Hatfield Road. A new roundabout will provide access to the site. The primary road will run from this roundabout south through the site. There is also a vehicle access point from Bramble Road. This allows access to and from the existing residential areas. The masterplan will create linkages to neighbouring areas and facilities. New pedestrian and cycle facilities on this site will also provide greater connectivity between the existing urban area and the open countryside. Areas of public open space will be situated on the south east of the site. Trees around Great Nast Hyde House will be retained preserving the setting and providing informal public open space. The land to the west of the primary access route and east of Wilkin's Green Lane as an area of open space, to be potential used for allotments and community open space. New trees and landscaping along the primary access road that runs through the site will be planted to reinforce this boundary. This will, along with Wilkin's Green Lane, provide an adequate buffer between the new residential area and the open countryside. The impact of development on the Green Belt will be mitigated by a wide landscape buffer along the boundaries with the Green Belt. This will soften the urban edge and bring the countryside and green landscape into the scheme.

The site is entirely in the ownership of Network Space and as such is available and deliverable in the short term. There are no apparent constraints to the development of the site. Access can be achieved into the site off the existing A1057 Hatfield Road and Bramble Road. Development on this site is achievable, based on the Council's own site assessment matrix. The site is also suitable, on the basis that the proposed development can make an efficient use of the land. Although not currently located within

the development limits the site does represent an excellent opportunity for future housing being located within a sustainable location. The development of the site would lead to opportunities being created for access to the green spaces beyond. The site would be within close proximity to both opportunities for outdoor sport and recreation and service and retail facilities and employment opportunities.

The Council has accepted the need for Green Belt release in addressing housing need in the Hatfield area. HAT3 is included in parcel GB35 within the Green Belt Review (EX38) which was noted not to make a significant contribution to Green Belt. Furthermore, the area was assessed as part of the updated Green Belt Review (March 2019), which commented that there are no strong separating features between St Albans and Hatfield and the perceived gap is weakened by the washed over development at Smallford and Sleafshyde. This is emphasised in paragraph 3.3 of the Green Belt Review which states that:

Smaller inset settlements can also reduce the amount of countryside between towns, particularly as perceived from connecting roads. Land that lacks a strong sense of openness, due to the extent of existing development that has occurred, will also make a weaker contribution.

Therefore, Network Space is concerned that the Council identify Parcel 48 as being essential to maintain. The evidence base contradicts this conclusion and therefore questions the objective assessment. **Network Space is therefore concerned with the approach of the plan and associated evidence base, which is unsound.**

Network Space consider that HAT3 is an appropriate and deliverable housing site. The proposed new Green Belt boundary has been designed to accord with the Framework which requires that boundaries should be clearly defined using readily recognisable features to ensure permanency. The proposed new boundary would utilise existing hedges, mature tree belts, roads, lanes and footpaths and will be well defined in the long term. The development will not result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town. The proposed edge of the Green Belt that would be created would soften the urban edge through creating a green landscape buffer area, with significant levels of tree planting, whilst utilising distinctive features to form a boundary and have a positive role to play in distinguishing between urban and Green Belt areas.

We trust the above comments and submitted documents are clear and can be taken into account in the development of the preparation of the Local Plan for the area. We reserve the right to provide further

comments and supporting documents in due course. Please do not hesitate to contact myself on the details below if you require any further information or clarification.

Yours sincerely

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