

**WELWYN HATFIELD LOCAL PLAN EXAMINATION:  
ADDITIONAL DOCUMENTS CONSULTATION: AUGUST 2019**

**Representations of CPRE Hertfordshire**

**IMPLICATIONS OF ECONOMY UPDATES (DOCUMENTS EX102; EX104A and EX104B).**

1. Campaign to Protect Rural England, Hertfordshire (CPREH) wishes to make representations on the above documents in respect of the significance of the assumptions by the Council for the soundness of the Submitted Welwyn Hatfield Local Plan.
2. These representations respond to the Programme Officer's email of 20 July 2019 inviting representors to comment on Examination Documents EX101 to EX152.
3. At the time of preparation of these representations the Council was still considering how to proceed following the submission of representations on additional potential housing sites and possible changes to Green Belt boundaries and other modifications to the submitted Plan in the light of the Inspector's comments on it, and the Inspector's further letter to the Council dated 8 August 2019. Such proposals, in the form of possible modifications to the Plan would need to consider the consequences for the Green Belt, and CPREH has previously stated a wish to participate in the Inspector's examination of any such changes at future hearings held by the Inspector.
4. The aspect of soundness that is addressed by these representations is whether sufficient evidence of exceptional circumstances can be demonstrated now to justify the scale and location of employment allocations proposed in the Green Belt by the Council in the Local Plan, and is also relevant to any modifications to the Plan that may be appropriate by the Council as a result of its latest studies on employment land following the Inspector's advice to the Council after the initial stages of the Examination.

**Implications of updated information on Economy for employment land provision (EX 102; EX104A and EX104B)**

5. The Employment Land Technical Note (EX104A) explains that the latest forecast by Experion, of 'B' class employment land demand (March 2019) has reduced since the 2017 Study on which the Submitted Plan was based, by 8 hectares for the Plan period to 2032, from 28 hectares to 20 hectares, a 29 percent reduction (paragraph 2.8 and Table 2-5). The Council's preferred 'hybrid' model (between the latest (2019) Experion model and the 2018 East of England model), estimates a 3 hectare reduction in land demand.

This is summarised in paragraph 6.7, and advises that this reduction results mainly from the after effects of recovery from the recession, and concerns about the future UK/EU relationship.

6. Moreover, the Note shows that Experion (authors of the latest March 2019 forecasts) state that there would be no additional 'B' class employment land required above their estimated total supply of 162 hectares, to meet demand by 2035 if the Plan period were extended by three years, as under consideration by the Council. The Council's preferred hybrid estimate between the Experion model and the East of England model, only estimates a requirement for 1 hectare more 'B' class land for a three year Plan period extension.
7. The Population based Employment Land Technical Note (EX104B) forecasts an even lower employment land demand for the Plan period to 2032 (paragraph 2.9 and table 2-3). Paragraph 2.10 indicates that 14 hectares of additional 'B' class land would be needed in the Plan period to 2032, six hectares (30 percent) less than proposed by the Submitted Plan.
8. CPREH questions whether this is still too high, because no allowance has been made for any increase in the proportion of employees, including self-employed, working from home by the end of the Plan period, from the low current estimate of 6.2 percent by the TUC (paragraph 2.7). The Note (paragraph 2.7) states that this is a 'high level assumption' that CPREH considers is unlikely to apply given the governmental and societal pressures to minimise transport movements for environmental reasons. An increase in home-working from the current estimate of 6.2 percent to only 10 percent of class 'B1a/b' employees over the Plan period would reduce the employment land demand by 4 hectares.
9. Paragraph 2.12 explains that the very small additional employment land requirement if the Plan period is extended (about 1 hectare), is due to the low population increase after 2032 now forecast.
10. The changes in forecasts noted above, are not accurately reflected in the Report to the Council's Planning and Parking Panel on the Local Plan Economy Update (EX102). For example the Report states (paragraph 3.12) that the forecast level of employment growth in the Plan period 'was slightly lower' (CPREH emphasis) than the 2017 forecast. The reduction is in fact from 6,800 to 5,200 jobs, nearly 24 percent.

11. Furthermore, there is no mention at all of assumptions that may significantly affect the amount of additional employment land likely to be required, for example on the assumed continued low proportion of class 'B1a/b' employees working from home.
12. The Report makes much of the 'loss' of offices to residential uses, a higher priority under national planning policy that is contributing more dwellings than assumed by the Submitted Plan. This trend is likely to reduce over time, however, and be replaced by greater emphasis on mixed-use regeneration of brownfield sites, incorporating a net increase in both office floorspace and housing stock, subject to wider events in the national economy.
13. The Report (paragraph 3.14) also misleadingly implies that more land would be needed if the Plan period were extended to 2035, but this is not the case, as demonstrated above based on the Council's Technical Notes (EX 104A and B).
14. The Report then fails to note any 'Implications for the Local Plan' under that heading (paragraph 3.15), merely cross-referring to the Technical papers and recommending noting of the contents of the Report and appendices, but CPREH considers this ignores important changes in forecasts based on recent global, national and local trends in the economy that affect Welwyn Hatfield.
15. The implications of the latest study of employment and employment land demand for the soundness of the Plan, is that there is reduced justification for the removal of the proposed amount of land from the Green Belt for employment land allocations, especially if the 29 percent, 8 hectare, reduction in forecast 'B' class land demand is accurate.
16. The population-based studies explained in EX104B reveal that 30 percent less employment land, a total of 14 hectares, may be required in the Plan period, even with the unjustified assumption that employees working from home does not increase over the Plan period or beyond.
17. In conclusion, CPREH notes that the findings of the labour demand and employment land studies indicate that less land needs to be allocated for future class 'B' land uses over the Plan period and beyond, than estimated when the Submitted Plan was prepared, and asks the Inspector examining the Plan to critically review whether the loss of Green Belt proposed by the Plan to meet that demand is justified, and therefore sound, in the context of NPPF 2012.