

WELWYN AND HATFIELD BOROUGH COUNCIL
LOCAL PLAN – STAGE 8 HEARINGS (SOUTHERN SETTLEMENTS)
INSPECTOR’S MATTERS AND ISSUES (EX184B)

Introduction:

We act on behalf of Landform Welham Green Ltd who is promoting a site for residential development located on the southern side of Bulls Lane (Skimpans Farm), Welham Green (site ref: WeG6). WeG6 is not allocated for development in the submitted plan.

The Inspector’s matters and issues in respect of specific sites proposed for development in the submitted plan raise a number of common themes and the central point amongst these is that once the requirement to release Green Belt (GB) land is accepted as an Exceptional Circumstance to meet need, what should the approach be to selecting settlements and sites?

It appears that the Council’s approach has been predominantly informed by the Green Belt Assessment (EX99) and that insufficient weight has been attached to other matters and considerations that, taken together, would result in a sustainable pattern of development that meet the requirements of the NPPF.

We would suggest that once the need to release GB is agreed (as supported by the evidence), then the focus of assessment should be how the spatial strategy would contribute to and secure a sustainable pattern of development. Factors to be taken into account include the technical delivery of the site as well as the merit of the site in spatial planning terms. Many of the matters that would be assessed give rise to a need for comparative assessment and some do not compare easily on a ‘like for like’ basis. A freestanding new settlement for example may perform better in GB terms but fail in terms of accessibility and connectivity. The evidence base is central to providing the technical basis for assessment, with comparative assessment being drawn-out through the SEA/SA process.

To date, we believe that the submitted plan and the accompanying evidence base, despite the element of ‘repair’ that has taken place, has failed to provide the basis for the assessment of the individual merits of sites, nor how sites compare to alternatives.

Welham Green:

Despite their own evidence confirming the suitability, availability and achievability of a number of sites in Welham Green (including WeG6) with a capacity for up to 539 plots, the Council has only proposed limited growth in the village, instead restricting it to just 92 homes, comprising 80 dwellings at Marshmoor (WeG4b) and 12 gypsy and travellers pitches at Foxes Lane (GTLAA01). The Council has resisted further allocations at Welham Green *inter alia*, on the grounds of the limited education capacity.

Welham Green is identified as a ‘Large Excluded Village’ (SP3). Supporting policy text defines these locations as *‘large service centres, but a more limited range of employment opportunities and services than the two towns. Shops and facilities mainly serve the community needs of these villages and those living in surrounding rural areas. Accessibility to the main road network is good and they are served by rail and/or bus networks. A secondary focus for new development where this is compatible with the scale and character of the village, and the maintenance of Green Belt boundaries.’*

Welham Green is the most sustainable of all the village settlements, with the second highest level of employment provision, after Hatfield, in the Borough, which has a main line railway station with frequent train stops. The issue is, therefore, which sites should be released and the degree of contribution that should be made.

Green Belt (Matter 4, Q52-60):

The proposed allocation in Welham Green, WeG4b, sits to the east of the settlement and is rated 'moderate high' harm in the Site Selection Assessment and GB Assessment however, it is dislocated from the village in urban planning terms.

WeG6 is located on the southern side of Welham Green in Parcel 59 and is within the existing village urban fabric. Its harm rating is also 'moderate'. WeG4b therefore compares poorly in GB harm to WeG6. A distinction between WeG6 and the proposed allocation therefore exists, but this has not translated into further allocations in Welham Green.

In addition, there is a clear difference in function between the northern side of Welham Green (the gap to Hatfield) and other parcels of land, specifically to the south. Parcels 56 and 57 were assessed in the GB Assessment as having a 'high' level of harm due to the proximity of Hatfield. However, land has been allocated to the north of Welham Green at HAT11, but not to the less sensitive southern side of the settlement.

It would therefore appear that allocations have been made that are contrary to (or at least rank materially lower in merit to alternatives) the accepted evidence base.

Technical Delivery of WeG4 (Matter 1, Q31 – Q39):

The technical delivery is for the Council to demonstrate, but we note that a Statement of Common Ground between the Council and WeG4 has not been agreed.

Education (matter 2, Q40 - Q46):

The Council has argued that education capacity should determine spatial strategy rather than respond to it and we have argued that education capacity should not be used as an excuse for not meeting full OAHN. NPPF is clear that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for community facilities including health, education and cultural infrastructure.

Education capacity should instead be provided to meet the forecast population growth and housing need, and not to determine or limit it.

The existing single form entry St Mary's primary school at Welham Green has a chequered academic record over the last fifteen years. It was in Special Measures in 2005 and on three occasions since it has been rated as Requiring Improvement. Currently there is a pupil roll of 135 pupils against a capacity of 210, representing barely more than half of capacity (Ofsted Report March 2019). The challenges it faces are real, of a long-term nature and are a product of ageing premises and a constrained site offering little or no prospect of modernisation or expansion.

Given its poor academic history, parents are sending their children to better schools, but the position of the Council is that the lack of education capacity is the reason for constraining housing supply at Welham Green. We disagree strongly with this approach and believe that increased housing supply is the mechanism by which improved schooling can be delivered

It is well recognised within the education sector that a new school represents a golden opportunity for a fresh start, a change of culture and the setting of new and higher ambitions for staff and pupils.

In so far as the capacity and location of schools informs the setting of a sustainable spatial strategy, we have joined with others promoting 'omission sites' in Welham Green, to propose a strategy for a replacement two form entry primary school, funded by the release of land at

Welham Green. A School Delivery Plan was submitted at Stage 3. The new school proposals have the support of the Diocese of St Albans, who own and operate St Mary's primary school.

At the Stage 3 hearing sessions, Herefordshire County Council (HCC) confirmed that the New Barnfield site would be made available for a secondary school to support additional housing that is required to meet OAN. Furthermore, it was confirmed that a number of options for additional primary school provision exist including land south of Dixons Hill (WeG17).

Local Services:

Policy SP3 recognises that most growth will be directed to the main settlements of Welwyn Garden City and Hatfield. Importantly, it highlights that the secondary focus for development will be at the large villages, which includes Welham Green. The village's position in the settlement hierarchy reflects its sustainability credentials for locating additional growth.

Welham Green has a population of 3,741 (2011 Census), containing approximately 4% of the existing residents within the Borough, but will only receive 0.8% of new dwellings in the draft Local Plan (i.e. 92 divided by 12,000).

Following Stage 1 and 2 of the examination, and the Inspector's findings on the Objectively Assessed Housing Need (OAHN), the Council agreed a revised figure of 16,200 in March 2018, but they have not declared how much of that they should meet. If growth is distributed across the borough on a proportionate basis, in line with the updated OAHN and submitted spatial strategy, the identified need for Welham Green between 2016 and 2036 is 648 (i.e. 16,200 x 4%) new dwellings.

Restricting the proposed level of growth at Welham Green will not enable housing needs at the village to be met and does not reflect its position in the settlement hierarchy. Further, by providing the largest proposed employment allocation at the village, without the corresponding levels of housing, the Council is providing for unsustainable patterns of growth through travel to work patterns and an unbalanced settlement.

Viability (Matter 2, Q40 – Q46):

The NPPG (Paragraph 001 Reference ID: 10-001-20190509) requires plans to set out the contributions expected from development. *'This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).'*

In addition, Paragraph 002 Reference ID: 10-002-20190509 states *'the role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.* The NPPF 2019 paragraph 34 states that *'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.'*

A Statement of Common Ground between the Council and promoters of WeG4b has not been agreed and we are not aware of any viability appraisal that demonstrates the site can provide a level of contributions consistent with emerging policy.

Comparison:

The table below compares the 2019 HELAA sites in Welham Green. One would expect WeG4b to compare favourably with the other promoted sites, but this does not appear to be the case.

HELAA (2019) Ref.	Site Address	Harm to Green Belt	Delivery in the Plan period	Flood Risk	Distance to Centre
WeG1 - 16 units	Units 1-3, 51 Welham Manor	Low	1-5 years	Zone 1	240m
WeG3a - 68 units	Land at Welham Manor and west of Station Road	Moderate	1-5 years	Zone 1	314m
WeG4b - 80 units	Marshmoor	Moderate High	1-10 years	Predominantly Zone 1, some areas in 2 or 3a/b.	670m
WeG6 - 73 units	Skipmans Farm	Moderate	1-5 years	Predominantly Zone 1, some areas in 2 or 3a/b.	555m
WeG10 - 120 units	Land at Dixons Hill Road	Moderate	1-5 years	Zone 1	275m
WeG12 - 83 units	Land north of Pooleys Lane	Moderate	1-5 years	Zone 1	445m
WeG15 - 140 units	Land at Potterells Farm	Moderate High	1-10 years	Zone 1	445m

In summary, we suggest that the submitted plan and accompanying evidence base has failed to provide the basis for the assessment of the individual merits of each site, or how the sites compare to alternatives.

Once the release of GB sites is accepted, there should be a logical process of the assessment of the various technical matters to arrive at a sustainable pattern of development that maximises the provision of housing against requirement. Our concern is that the current approach is not following this logical process.

These shortcomings should be addressed through modifications and an update to the evidence base, including the SEA/SA, with a review on the resumption of the examination in due course.

BARTON WILLMORE

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