



**Date to be added**

Mrs S Tiley  
Head of Planning Policy and Implementation  
Welwyn Hatfield Borough Council,  
The Campus,  
Welwyn Garden City,  
Herts,  
AL8 6AE

Our Ref: PL11/CC

Your Ref: LPC

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Dear Mrs Tiley

**WELWYN HATFIELD BOROUGH COUNCIL – Local Plan Consultation Document.**

Thank you for providing North Hertfordshire District Council with the opportunity to comment on the Local Plan Consultation Document and the supporting information.

North Hertfordshire District Council welcomes the duty to cooperate activity that has taken place to date between our councils and consider that further discussion with Welwyn Hatfield Borough Council, as well as other authorities and prescribed bodies, will be an important feature of our future work as we seek to progress towards examination of our respective plans.

**Housing**

The Housing Market Area

We note the map shown in figure 1 on page 13 of your consultation document which sets out how you consider your housing market area (HMA) to be formed. Your Strategic Housing Market Assessment of September 2014 appears to have started from the assumption that the whole borough needs to be contained within a single housing market area. We would question whether the approach taken has resulted in a HMA which perhaps works solely from a Welwyn Hatfield perspective, but not from anyone else's.

We appreciate that to do otherwise, as we have done, would likely result in the borough being split geographically amongst a number of different HMAs. It should be noted that the National Planning Practice Guidance (NPPG) at paragraph 10 of section 2a (2a-010) states amongst other things that *"a housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap. The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority boundaries"* (our underlining).

Mathematically it will always be possible to construct an HMA which contains an entire borough, but the resulting HMA may well be contrived and may make negotiations under the duty to co-operate harder to conclude. Your HMA definition has not considered the extent to which places you have included in your Welwyn Hatfield HMA may have stronger relationships elsewhere. This has led to your HMA having intuitively unlikely outcomes such as some of the eastern wards of St Albans city being classed as being in your HMA whilst

the rest of the city is not, or Hertford being included but not Ware. These are perhaps the most striking examples.

However, we believe the same logic also applies to how the housing market area you have defined affects North Hertfordshire. We readily accept that Knebworth and Codicote have a relationship with the Welwyn Garden City area. Our own SHMA concluded that Codicote forms part of a Welwyn Garden City-based housing market area. However, we do not believe the situation is as clear cut for Knebworth. Whilst Knebworth does certainly have a relationship with Welwyn Garden City, it also has a relationship with Stevenage which we believe is far stronger. Therefore from the point of view on making decisions about growth around Knebworth we believe the HMAs that is more useful is ours linking it to the Stevenage area.

#### Clarity of bordering sites

From what we can see it is not clear whether the proposed major site within East Hertfordshire, but on the boundary of Welwyn Hatfield, is believed to count towards meeting needs in East Hertfordshire or within Welwyn Hatfield. We suggest your two authorities need to reach a clear and explicit agreement on this point.

#### Objectively Assessed Need

North Hertfordshire District Council welcomes the acknowledgement on page 12 of the document of your OAN for housing being in the region of 12,500 homes within the borough by 2031. However, we are concerned at the suggestion in table 1 (page 21) of your document, that you consider that perhaps only 10,152 dwellings could be delivered within the borough. It is not clear whether table 1 includes any of the 'finely balanced' or 'less favourable' housing sites and we would suggest that including these in this table would provide a clearer picture of the capacity of the borough to meet its own needs. If you do wish to exclude your 'finely balanced' or 'less favourable' sites from the plan, we suggest you will need robust evidence as to both the harm that developing these sites would cause, and the harm that failing to meet needs may cause. As a neighbouring authority we recognise that there may be occasions when it is legitimate to consider taking unmet needs from heavily constrained neighbours. However, any such request would need to be based on convincing evidence of constraints and impacts, should not expect neighbouring authorities to release land that you yourselves would have sought to protect had it been in your area, and should be based on an agreed housing market area geography.

We would also welcome a further clarification with regard to table 1 in respect of the identified OAN for each sub area. How has this figure been derived, is this just a simple pro-rata calculation. We would suggest that seeking to distribute housing proportionately could lead to a failure to plan for the full OAN of the borough based on an artificial constraint of numbers. For example, the OAN for Welwyn Garden City is suggested to be 5,600 dwellings but the total capacity of the town is stated in the final column to be 3,963. How and where will the residual 1,637 dwellings be delivered?

With regard to provision of Gypsy and Traveller sites, we would welcome clarification as to whether these sites have been assessed in the same way as housing sites as this is not made explicitly clear under section 9 of your document 'Approach to site selection'.

#### **Green Belt Review**

We have considered your published Green Belt review and it is noted that this review was undertaken jointly with St Albans City and District and Dacorum Councils. Clearly this is a comprehensive document, however, we do have some concerns that the introduction of a *'local*

*purpose*’ may have resulted in the discounting of some potential sites for development which could assist the borough in meeting its OAN. It is noted that that the ‘local purpose’ was stated in Part 1 of the review to be for the purpose of ‘preventing villages merging with each other or with towns’. This was changed in Part 2 of the review to be ‘to maintain the existing settlement pattern’. It is not clear whether or not this change of wording has actually changed the approach to site selection. However, the substantive point is that the addition of a ‘local purpose’ in Green Belt review is not appropriate.

The five purposes of the Green Belt set out in the National Planning Policy Framework (NPPF) are quite clear, particularly the second of those purposes which is “*to prevent neighbouring towns merging into one another*”. This makes it quite clear therefore, that the merging of towns with villages and villages with villages, is not an offence of Green Belt policy. It is notable that at paragraph 2.4.20 of Part 1 of the Green Belt review it states that “*any Green Belt review and local policy related to Green Belt needs to be prepared directly in accordance with national policy as set out in the NPPF. This policy continues to advocate the five purposes of Green Belt and states openness and permanence as essential characteristics*”. We are sympathetic to the aim of this additional purpose, however, we would suggest that it is not appropriate to take this into account during the site selection process. This is an issue that you will know we have also had to grapple with in our recent ‘preferred options’ consultation document.

Linked to the Green Belt review are some comments that we would wish to make with regard to the Sustainability Appraisal (SA/SEA). Table 2.1 of the SA/SEA, which sets out the appraisal framework, only makes reference to Green Belt under item 6 in relation to allowing businesses to expand without compromising the objectives of the Green Belt. In the commentary on the majority of sites located in the Green Belt the assessment uses a site’s location in the Green Belt as a reason for scoring sites negatively within the “retaining local distinctiveness” and “landscape character” criteria. Firstly, this suggests that Green Belt is something other than a policy designation and has a degree of value, but secondly this has not been identified as a potential consideration within the SA framework (as per Table 2.1). We would suggest that either Table 2.1 needs to be changed to reflect the consideration of Green Belt under these criteria or the references to Green Belt need to be taken out. We would suggest that the latter is the most appropriate course of action.

## **Employment**

We consider that your employment strategy seems sensible, although we would note that paragraph 22 of the NPPF states that “*planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose*”. If the evidence suggests that this is the case with certain sites in the district, as is alluded to in the text of your document at paragraph 3.11, then the sites should not be protected and alternative uses such as residential should be considered, which in turn may help towards meeting the OAN.

## **Infrastructure**

We welcome the level of detail set out in your Infrastructure Delivery Plan (IDP), and hope to work with you as we seek to update our own IDP document over the coming months. In particular we would welcome continued and further discussion with yourselves, and a wider group of bodies, regarding improvements to the A1(M) and other local road infrastructure.

To conclude, we would like to reaffirm our commitment to working with you during the plan making process in order that both of our Councils may proceed to the submission of sound Local Plans.

Yours sincerely

Cllr David Levett  
Portfolio Holder Planning and Enterprise