



24 October 2016

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Head of Planning Policy and Implementation  
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Our Ref: PL11/CC

Your Ref: LPC

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Dear Mrs Tiley

**WELWYN HATFIELD BOROUGH COUNCIL – Proposed Submission Local Plan  
Consultation Document**

Thank you for providing North Hertfordshire District Council with the opportunity to comment on the Proposed Submission 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 (WHBC), as well as other authorities and prescribed bodies, will be an important feature of our future work as we seek to progress towards Submission and Examination of our respective plans.

We believe that it is important for local plans in the surrounding area to be found sound to ensure proactive, joined up plans cover the whole of the local area and that growth and solutions are co-ordinated creating sustainable, attractive, well planned developments.

Please find attached completed response forms in relation to specific issues on which we have commented, namely:

- The Housing Market Area;
- Housing and the Objectively Assessed Need;
- Employment;
- The Green Belt Review;
- Infrastructure; and
- Appropriate Assessment

Yours sincerely

*Cllr David Levett*  
Portfolio Holder Planning and Enterprise

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## The Housing Market Area

We note from the evidence that the extent of the HMA has been maintained and that the SHMA and subsequent updates have started from the assumption that the whole borough needs to be contained within a single housing market area. We still 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).

We accept that Knebworth and Codicote have a relationship with the Welwyn Garden City area as our own SHMA identifies that the "Stevenage HMA", within which most of North Hertfordshire lies, extends as far south as Welwyn Garden City reflecting this link.

Whilst the HMA area defined by your SHMA uses a different geography and includes the Knebworth and Codicote areas, a study to define housing market areas in the Luton and surrounding areas was undertaken in 2015<sup>1</sup>. This study looked at much wider considerations including existing sub-regional housing markets and travel to work areas (TTWA) to derive a consensus from local planning authorities and other relevant stakeholders about the most appropriate HMAs for the former county of Bedfordshire together with Aylesbury Vale, Milton Keynes, North Hertfordshire, Stevenage and the surrounding areas. In terms of outputs, this work essentially concludes that the WHBC area is covered by the Stevenage HMA and the St Albans HMA. The report reviewed existing SHMAs and HMAs in the area including the Welwyn HMA / SHMA and suggests that the commuting information is largely based on ward level data and the calculations also largely use 2001 census information.

Based on this recent work, it is our view that starting at a wider scale and focussing down is probably more appropriate and works better in terms of working cross boundary as a number of local authorities were involved in the work creating a basis for agreement on this issue. That said, we are aware that WHBC as an area is finely balanced with regards to where it fits and the commuting patterns that occur in the area, which means the boundaries can be drawn in a number of different ways.

Regardless of the methodologies used to define the HMAs, the PPG does suggest housing market areas may overlap, which clearly the Stevenage HMA and the Welwyn HMA do. The key issue would appear to be the requirement for meeting need within it and what happens to the need that is not met. As such we do not have a concern with regard to the extent of the HMA, more the fact that the HMA includes part of North Hertfordshire and has unmet need attributed to it. From rough estimates and based on sites in the emerging North Hertfordshire Local Plan, the proportion of need attributed to the Codicote and Knebworth areas identified as part of the Welwyn HMA has been met (if not exceeded), however the same cannot be said about the remainder of the Welwyn HMA and what happens to this unmet need is the key concern.

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<sup>1</sup> Housing Market Areas in Bedfordshire and the surrounding areas (2015) ORS

Based on our own interpretation of the HMAs in this area as set out in our own housing background paper<sup>2</sup>, the Stevenage HMA covers 52% of the population of WHBC, however, again, there doesn't appear to be the capacity in the sites to deliver the required provision of 6900 as capacity would only appear to total 4900.

So regardless of the methodology used there appears to be unmet need in the WHBC area. As a matter of process we have not formally been approached by WHBC to accommodate any additional unmet need and so our plan does not provide for this. The sites identified in our own local plan for Codicote and Knebworth are already numerous and challenging. No additional sites in this area are considered suitable and so no additional development in this area would be supported.

### **Housing and Objectively Assessed Need (OAN)**

The Plan sets out a requirement for 12,000 homes. The Plan acknowledges that this is below the Objectively Assessed Need (OAN) for housing as set out in the Strategic Housing Market Assessment (SHMA).

The Council need to have satisfied themselves that they have explored all possible options to meet the OAN of 13,433. On this matter, whilst it is reported in the plan that there is a site in East Hertfordshire that adjoins the settlement of Welwyn, it would appear that this is to meet EHDC needs and not WHBC, therefore a significant number of houses are unaccounted for which, as a neighbouring authority is a concern, baring in mind the boundaries of the Welwyn HMA and the fact that it includes part of North Hertfordshire.

From evidence in the SHLAA it would appear that most of the sites identified as being suitable, achievable and deliverable are being allocated. That said, the criteria used in the SHLAA to reject sites from the process are regarded as particularly stringent in relation to things like employment land protection. This is to a degree understood in relation to the importance attached to the authority's position as an employment destination and the strength of the economy, however, the Council needs to assure itself that it has made every effort to meet its OAN and whether the importance attached to meeting the OAN should outweigh the need to protect employment land in certain circumstances. This debate needs to be framed in the context of Paragraph 22 of the NPPF which 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*", but also the Government's relaxation of permitted development rights for office to residential conversions and how this has transpired in recent times in Welwyn. Regardless, the decisions regarding employment land are set out clearly as part of the evidence base and seem sensible in order to meet economic needs as referred to in a separate representation. This just needs to be weighted appropriately against meeting housing need.

### **Employment and Jobs**

As reported in the plan, the evidence identifies a range of employment and job scenarios using approaches based on Experian, EEFM and past trends. Whilst the projection of housing numbers is a relatively straight forward task, the same cannot be said of jobs and employment, largely because it is very difficult to monitor and not something that is easily controllable, employment models are also very volatile and liable to change depending on

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<sup>2</sup> North Hertfordshire Housing Background Paper (2016)

the input of macro factors, however the projections seem reasonable and a sensible estimation of future demand.

The link between housing and jobs is clearly set out in evidence and the update to the SHMA (2016) and this is clearly an important determinant in the number of houses required over the plan period. However, in simple terms whilst the number of jobs and additional workers created is balanced by potential new homes, without identifying the sufficient number of houses to meet the OAN there is the potential impact that the strategy creates an imbalance as a result of creating more jobs than houses delivered, therefore actually creating more in-commuting.

Additionally a high proportion of the jobs scenarios in the evidence suggest significant increases in demand for B8, however, new allocations only seem to cater for B1 uses. The Council needs to be certain that it can deliver a mix of uses on the land that is allocated so that it does not restrict the market to be able to deliver the objective assessment of employment land.

### **Green Belt Review**

Building on the comments that were raised during the previous consultation we have again 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 still have concerns regarding the introduction of a '*local purpose*' which 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 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 and whilst this criterion does not score highly in terms of the weighting we believe that it shouldn't be scored at all. .

Additionally some of the parcels in the Green Belt Review are very large. Clearly covering an area which includes 3 districts is a significant scale and a strategic level assessment is needed, however, whether there is an appropriate level of granularity to assess the parcels of land in the context of the sites is a key consideration. It is noted that a site level assessment has been undertaken, but the role that part of the parcel plays locally is key to its score / assessment.

## **Infrastructure**

We welcome the level of detail set out in your Infrastructure Delivery Plan (IDP). 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.

NHDC supports the acknowledgement of primary school provision attributed to growth in Codicote and Knebworth in the Infrastructure Delivery Plan (para 6.59).

The transport modelling undertaken so far is also supported as it would appear to incorporate an appropriate level of growth for North Hertfordshire. It should be noted, however, that further modelling work between the immediately adjoining authorities may be required prior to examination to ensure that most up-to-date information is used.

## **Appropriate assessment**

We note your Appropriate Assessment and the outcomes of the process. The emerging Hertfordshire-wide water study may provide more refined information with regards to Rye Meads, which may provide more up to date information, however, this will involved all relevant local authorities.