

Welwyn Hatfield Local Plan

Five Year Housing Land Supply and the Housing Trajectory

December 2021



Five Year Housing Land Supply and the Housing Trajectory

1. Introduction

- 1.1 The following information has been prepared in response to the Inspectors letter EX271 and Supplementary Report EX272. In this letter, the Inspector requests evidence that the Council will have a five-year housing land supply on adoption, and that if a stepped trajectory is required this should be accompanied by a sound justification. In the supplementary report, the Inspector also states that 'the housing trajectory should ensure, as far as possible, the delivery of the proportionate amount of housing supply throughout the plan period'.
- 1.2 The Inspector has also confirmed (in EX274) that 2018-based household projections represent a meaningful change, justifying a reduction in the housing target from 16,000 dwellings (800 dwellings per annum) to 15,200 dwellings (760 dwellings per annum) for the plan period 2016 – 36.
- 1.3 This update to the five year housing land supply position and trajectory has been prepared based on the revised target of 760 dwellings per annum.

2 Five Year Requirement

- 2.1 The first years of the plan period have already elapsed and housing delivery has been below target resulting in a shortfall. The table below shows the shortfall since the start of the plan period in 2016/17. Against the target of 3,800 dwellings, 2,514 dwellings were delivered up to 31 March 2021. This shortfall will need to be made up in future years.

Table 1: Shortfall 2016/17 – 2020/21

Target 2016/17 - 2020/21 (760 x 5)	3,800
Completions 2016/17 - 2020/21	2,514
Shortfall 2016/17 - 2020/21	1,286

- 2.2 Under the more stringent Sedgefield method previous under delivery is made up in the first five years, whilst under the Liverpool method the past shortfall is made up across the entire plan period. The five year housing requirement for Welwyn Hatfield has been presented in table 2 under both the Liverpool and Sedgefield method for calculating housing land supply. The requirement for the first five years in both methodologies also includes a 20% buffer as required by the NPPF, reflecting persistent under delivery of

housing in Welwyn Hatfield against this target. This additional 20% is moved forward from later in the plan period, so the total overall target remains at 15,200.

- 2.3 Table 2 below sets out the calculation of the five year requirement taking into account both the shortfall and the requirement for a 20% buffer using both approaches.

Table 2: Five Year Housing Requirement

		Liverpool	Sedgefield
A	Annual Housing Target	760	760
B	Five Year Requirement (A x 5)	3,800	3,800
C	Forecast under delivery 2016 - 2021	$(1,286/15 = 85.73) * 5$ years = 428.67	1,286
D	20% Buffer (B x 20%)	760	760
E	Five Year Requirement	4,989	5,846

- 2.4 Whilst the Sedgefield method for making up shortfall could be considered more robust at standing up in appeal, in neighbouring authority East Herts the Inspector adopted an approach making up the shortfall over a 10 year period, and in North Herts shortfall will be made up across the entire plan period (the Liverpool method). Both of these authorities also face Green Belt constraints similar to Welwyn Hatfield.

- 2.5 An alternative approach could be to make up the shortfall in the middle part of the plan period resulting in it being accommodated more quickly than in the Liverpool methodology. This would require the setting of a stepped target to ensure that the assessment of the five year land supply and the assessment of housing delivery takes this phased approach into account.

Table 3: Five Year Housing Requirement – Alternative Approach

		Alternative Approach
A	Annual Housing Target	760
B	Five Year Requirement (A x 5)	3,800
C	Forecast under delivery 2016 - 2021	0 (1,286 undersupply carried forward to years 6-10)
D	20% Buffer (B x 20%)	760
E	Five Year Requirement	4,560

- 2.6 These three approaches would then result in different targets for the remainder of the plan period as set out in Table 4.

Table 4: Plan Period Targets

Plan period	Sedgefield approach	Liverpool approach	Alternative approach
2016/17- 2020/21	2,514	2,514	2,514
2021/22- 2025/26	5,846	4,989	4,560
2026/27- 2030/31	3,800	4,229	5,086
2031/32 -2035/36	3,040	3,469	3,040

3 Housing Supply

- 3.1 While the Submitted Draft Local Plan relied on a stepped target to achieve a 5 year housing land supply, many of the additional sites submitted to the examination since, as well as the sites not submitted but recently examined by the Inspector in the Stage 9 hearing sessions could contribute, or contribute in part to the five year housing land supply.
- 3.2 There are 70 sites which have been examined which are potentially sound. When taking an optimistic view on delivery forecasts, 58 of these sites could potentially contribute to delivery in the first five years following adoption. If *all* of these 58 sites were included, supply in years 1-5 would total **5,316** dwellings. Therefore it would not be possible for the Council to meet the five year housing land supply under the Sedgefield methodology. The Council would fall short of the required 5,846 dwellings by 530 dwellings, thus resulting in a supply of only 4.5 years. If the Sedgefield methodology were to be used then a stepped target would be required in order to achieve a five year housing supply.
- 3.3 However, under the Liverpool methodology, when including all 58 sites which could potentially contribute to delivery in the first five years following adoption, it would be possible to meet the five year housing land supply requirement without a stepped trajectory. In this scenario, which would include all sites which have come forward in and around the villages, supply would be 327 dwellings above the required 4,989 dwellings, and would result in a housing land supply of 5.3 years. Whilst under the Alternative Approach the surplus would increase to 756 dwellings and result in a supply of 5.8 years.

- 3.4 However, it should be noted that this is based on a more optimistic view of delivery rates, which includes 140 completions from the sites in Welwyn (Wel1, Wel2, Wel15) within the five years. This is considered quite optimistic given the required highways upgrades and new bridge as well as various other factors outlined in the HELAA assessments and possible legal issues associated with a proposed village green designation. The Inspector has indicated in paragraph 41 of his Supplementary Report EX278 that some sites might have longer lead in times because of site assembly or access issues. Taking into account these comments the Council considers delivery in years 6-10 more likely for these sites. In addition, this also assumes 125 dwellings at BrP4 will deliver in years 1-5. The requirement for a new footbridge across the railway and access road make this quite optimistic. A more cautious forecast would be completions at this site starting in the middle part of the plan period and completion in the last 5 years. If forecast delivery at these sites was pushed back then the Council would meet the requirement under the Liverpool methodology by just 62 dwellings, resulting in a housing land supply of 5.1 years. Under the Alternative Approach this would be exceeded by 491 dwellings and result in a supply of 5.5 years. Appendix 2 sets out revised delivery rates based on these assumptions.
- 3.5 Whilst it is possible for Welwyn Hatfield to meet the five year housing requirement without a stepped target under the Liverpool and Alternative Approach methodologies, there would be a number of implications in terms of the housing trajectory and other requirements set. These consequences are considered in the next few paragraphs.

4 Consequences of prioritising five year land supply over other considerations

Reliance on very high delivery rates in years 4 & 5

- 4.1 Supply in the first three years of the plan period from adoption will largely be made up of commitments and urban local plan sites which already have planning permission granted or an application submitted. As discussed at the hearing sessions it is generally not expected that Green Belt sites would start delivering housing completions until at least year 4 of the plan period following adoption. For the larger strategic sites, infrastructure and other constraints may also impact on lead-in times earlier in the plan period. Analysis on delivery timescales at historical sites in the borough shows that the time from a planning application being submitted to construction commencing takes on average just under two years.
- 4.2 Considering these factors, delivery would not be expected to reach (and exceed) the target until year 4. Therefore, in order to achieve a five year housing land supply on

adoption without a stepped target this would rely on a very high level of housing delivery in years 4 and 5 of the plan. As discussed in paragraph 4.1, years 1-3 of the plan period will consist largely of commitments and urban sites which already have planning applications granted or submitted. This means that delivery in years 4 and 5 would need to average just over 1,650 dwellings each year in order to meet the five year requirement under the Liverpool method.

- 4.3 In addition, whilst the evidence submitted to the examination currently indicates that many sites are deliverable or partly deliverable in years 1-5, in reality the market may well deliver a slower build out rate than evidence submitted to the examination currently points to. Monitoring of historical completions since 2001 shows that the highest level of delivery in a single year was 812 dwellings in 2003/04, this is well below (approximately half) the required 1,650 needed in years 4 and 5 to meet the five year requirement without a stepped trajectory.

Proportionate amount of delivery throughout the plan period

- 4.4 The 58 sites that have potential to contribute to the five year housing supply amount to 9,549 dwellings and include 17 sites which also contribute to delivery later in the plan in years 6-15. The forecast distribution of delivery for these sites across the plan is presented in table 5 below. The table also splits out commitments, windfall and urban sites which are not expected to deliver in years 1-5, however will contribute to delivery in years 6-15. The total of these components is 15,086 dwellings (just 98 dwellings below the OAN). Green Belt sites not contributing to the five year supply are also presented separately.

Table 5: Housing Supply – All sites examined*

	1-5	6-10	11-15	Total
All sites contributing to 5 year supply (GB & Urban)	4,243	4,226	1,080	9,549
Urban sites <i>not</i> contributing to 5 year supply	N/A	264	271	535
Commitments + Small sites	795	17	8	820
Windfall	278	695	695	1,668
Completions 2016 - 2021				2,514
Sub- Total	5,316	5,202	2,054	15,086
Target/Requirement (Liverpool)	4,989	4,229	3,469	
Dwellings above/below target	+327	+973	-1,415	
Target/Requirement (Alternative)	4,560	5,086	3,040	
Dwellings above/below target	+756	+116	-986	
Green Belt sites <i>not</i> contributing to 5 year supply	N/A	816	800	1,616
Total				16,702

*See Appendix 1 for sites detail

Overprovision in the middle years of the plan period

- 4.5 The scenario set out in Table 5 is based on 58 sites contributing to the five year land supply and shows that there is large over supply in the middle part of the plan period, with supply in years 6-10 totalling 5,202 dwellings. This is well above the 4,229 required under the Liverpool methodology or the 5,086 required under the Alternative Approach for this period. However, there are very few sites delivering in years 6-10 which do not also contribute to the five year land supply. The majority of sites expected to start delivering after year 5 are urban sites therefore their removal would not comply with the sequential approach.
- 4.6 The Green Belt sites not contributing to 5 year supply and delivering in years 6-10 include Marshmoor, Wel6 and Symondshyde. The scenario set out in Appendix 2 is based on 56 sites contributing to the five year land supply. This assumes that the additional Welwyn sites (Wel1, 2, 15) are slower to come forward and would also fall entirely within years 6-10 and HS22 (BrP4) would fall between years 6-15.

Lower levels of delivery in the later years of the plan

- 4.7 Delivery in years 11-15 was forecast to total 2,897 dwellings in the submitted plan. However, as a result of the reduction in dwellings at Birchall Garden Suburb SDS2 (WGC5) and if the removal of Symondshyde were to be confirmed then this number would be considerably reduced, with just 2,054 dwellings expected to deliver in the last five years of the plan (based on the assumptions in Appendix 1). The Inspector has indicated that lower delivery towards the end of the plan period is not in the interests of the long term protection of the Green Belt as there would be a need for early release of more land towards the end of the plan period in order to maintain a 5 year housing supply.
- 4.8 The inclusion of sites not contributing to the five year land supply including Symondshyde would improve supply in the latter years of the plan, which would increase to a maximum total 2,854 dwellings (based on the assumptions in Appendix 1), just 186 dwellings below the 3,040 target under the Alternative and Sedgefield approach and 615 dwellings below the 3,469 under the Liverpool approach. This would result in the FOAHN target being exceeded as almost all sites contributing to the five year supply would still need to be included in order to maximise delivery in the first five years unless the Alternative Approach is adopted.

Distribution of development across settlements

- 4.9 Meeting the five year housing land supply without a stepped target requires almost all of the sites to come forward around the villages, which would result in disproportionate development in some settlements. Meeting the five year requirement may also result in the inclusion of some sites which are less sustainable in terms of facilities, services and transport in order to meet the five year requirement, for example the inclusion of sites in Stanborough and Lemsford.

5 Housing Delivery Test

- 5.1 Under a target of 760 dwellings per annum, the Council would remain in presumption of sustainable development for the first three years following adoption of the plan as the Housing Delivery Test result would remain below the 75% threshold. As discussed in paragraphs 3.1 – 3.2, delivery is not expected to reach and exceed the target until year 4. Looking at delivery forecasts for the first three years as well as recent levels of completions, the Council would only be achieving around 70% of its target for the first three years of the plan, meaning that presumption in favour of sustainable development would apply, which could impact the delivery of policies within the newly adopted Local Plan.

6 An appropriate stepped target

- 6.1 The Options set out in the Site Selection Addendum have been tested against the targets set out in the Alternative Approach of 4,560 dwellings or 912 dwellings per annum from adoption. However it is not until year 4 that delivery will reach those rates meaning that the Housing Delivery Test penalties would apply for the first three years.
- 6.2 A stepped target which reflects the rates of delivery from the selected option would be appropriate. Appendices 3 and 4 set out the required stepped target for Options C and D.

7 Conclusions

- 7.1 Whilst under the Liverpool method of calculating housing land supply it would be theoretically possible to meet the five year housing land supply requirement without a stepped target, this would require almost *all* sites which contribute to delivery in the first five years to be selected. It would also rely on substantially high levels of delivery in years 4 and 5 of the plan, which are not considered realistic.

7.2 Given below target delivery levels since 2016/17 as well as the level of delivery expected from commitments completing in the next two to three years, a stepped target is considered reasonable. A stepped target would also give the opportunity for the inclusion of sites with longer lead in times. This would assist with delivery levels in the latter years of the plan period, rather than focussing just on sites which will contribute to a high five year supply requirement.

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Wel Green	WeG4b	SDS7	Marshmoor	N											40	60									100
Wel Green	GTAA01	HS35	Foxes Lane, Dixons Hill Rd	Y						12															12
Wel Green	WeG1		51 Welham Manor	Y								16													16
Wel Green	WeG3a		Land South of Wel Manor	Y									34	34											68
Wel Green	WeG10		Dixons Hill Road	Y									60	60											120
Wel Green	WeG12		Land N of Pooleys Lane	Y									20	20	20	23									83
Wel Green	WeG15		Land at Potterells Farm	Y									36	36											72
Wel Green	WeG6		Skipmans Farm	Y									36	37											73
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	Y										14											14
Brookmans Park	BrP4	HS22	Land West of Brookmans Park Station	Y									50	75	100	150	103								478
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	Y									10												10
Brookmans Park	BrP1		Upper Bell Lane	Y									52	52											104
Brookmans Park	BrP12		Land North of Peplins Way	Y									62	63											125
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	Y									17	18											35
Little Heath	BrP7	HS24	Land S of Hawkshead Rd	Y										50	50										100
Little Heath	LHe4/5		Part of Studlands/Videne	Y									31	32											63
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	Y						-1	6														5
Cuffley	Cuf1	HS27	Land at The Meadway	Y										60											60
Cuffley	Cuf6	HS28	Land south of Northaw Road East	Y								5	30	46	40										121
Cuffley	Cuf12	HS29	Land North of Northaw Road East	Y									35	38											73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	Y									35	40											75
Cuffley	Cuf15		King George V Playing Fields	Y									20	30	50	50	26								176
Rural Areas	Hat15	SDS6	Symondshyde New Village	N											100	150	150	150	150	175	175	150	150	150	1500

Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total
Sites Total – All sites examined (as above)	-	-	-	-	21	114	285	460	1,432	1,952	1,735	1,155	903	838	675	679	474	382	300	316	11,721
Small Sites						1			5									8			14
Completions	671	315	462	673	372																2,493
Commitments						481	308					-7	24								806
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	1,668
Total	671	315	462	673	393	596	593	460	1,576	2,091	1,874	1,287	1,066	977	814	818	613	529	439	455	16,702

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Wel Green	WeG4b	SDS7	Marshmoor	N											40	60									100
Wel Green	GTLAA01	HS35	Foxes Lane, Dixons Hill Rd	Y						12															12
Wel Green	WeG1		51 Welham Manor	Y								16													16
Wel Green	WeG3a		Land South of Wel Manor	Y									34	34											68
Wel Green	WeG10		Dixons Hill Road	Y									60	60											120
Wel Green	WeG12		Land N of Pooleys Lane	Y									20	20	20	23									83
Wel Green	WeG15		Land at Potterells Farm	Y									36	36											72
Wel Green	WeG6		Skipmans Farm	Y									36	37											73
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	Y										14											14
Brookmans Park	BrP4	HS22	Land West of Brookmans Park Station	Y											75	75	75	75	75	103					478
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	Y									10												10
Brookmans Park	BrP1		Upper Bell Lane	Y									52	52											104
Brookmans Park	BrP12		Land North of Peplins Way	Y									62	63											125
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	Y									17	18											35
Little Heath	BrP7	HS24	Land S of Hawkshead Rd	Y										50	50										100
Little Heath	LHe4/5		Part of Studlands/Videne	Y									31	32											63
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	Y						-1	6														5
Cuffley	Cuf1	HS27	Land at The Meadway	Y										60											60
Cuffley	Cuf6	HS28	Land south of Northaw Road East	Y							5	30	46	40											121
Cuffley	Cuf12	HS29	Land North of Northaw Road East	Y									35	38											73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	Y									35	40											75
Cuffley	Cuf15		King George V Playing Fields	Y									20	30	50	50	26								176
Rural Areas	Hat15	SDS6	Symondshyde New Village	N											100	150	150	150	150	175	175	150	150	150	1500

						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Sites Total – All sites examined (as above)	-	-	-	-	21	114	285	460	1,328	1,791	1,700	1,148	939	931	750	782	474	382	300	316	11,721
Small Sites						1			5									8			14
Completions	671	315	462	673	372																2,493
Commitments						481	308					-7	24								806
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	1,668
Total	671	315	462	673	393	596	593	460	1472	1930	1839	1280	1102	1070	889	921	613	529	439	455	16,702

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Cuffley	Cuf15		King George V Playing Fields	Y									20	30	50	50	26								176
Rural Areas	Hat15	SDS6	Symondshyde New Village	N																100	100	100	100	100	500

Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total			
Sites Total – Recommended sites (as above)	0	0	0	0	21	114	285	460	1243	1659	1520	968	789	781	600	707	399	332	250	266	10,394			
Small Sites						1			5									8				14		
Completions	671	315	462	673	372																			2,493
Commitments						481	308					-7	24											806
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	139	139	139	1,668
Total Supply	671	315	462	673	393	596	593	460	1387	1798	1659	1100	952	920	739	846	538	479	389	405	15,375			
Stepped Target	610							1,025							629						15,200			

Settlement	HELAA Ref	Local Plan Ref	Site	5YHLS?	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
Wel Green	WeG3a		Land South of Wel Manor	Y									34	34											68
Wel Green	WeG10		Dixons Hill Road	Y									60	60											120
Wel Green	WeG12		Land N of Pooleys Lane	Y									20	20											40
Wel Green	WeG6		Skipmans Farm	Y									36	37											73
Brookmans Park	BrP13	HS21	Land west of Golf Club Rd	Y										14											14
Brookmans Park	BrP4	HS22	Land West of Brookmans Park Station	Y											75	75	75	75	75	53					428
Brookmans Park	BrP14	HS23	Land east of Golf Club Road	Y									10												10
Little Heath	LHe1	HS24	Land N of Hawkshead Rd	Y									17	18											35
Little Heath	LHe4/5		Part of Studlands/Videne	Y									31	32											63
Cuffley	No02	HS26	36 The Ridgeway and land to the rear	Y						-1	6														5
Cuffley	Cuf1	HS27	Land at The Meadway	Y										60											60
Cuffley	Cuf6	HS28	Land south of Northaw Road East	Y							5	30	46	40											121
Cuffley	Cuf12	HS29	Land North of Northaw Road East	Y									35	38											73
Cuffley	Cuf7	HS30	Wells Farm, Northaw Road East	Y									35	40											75
Rural Areas	Hat15	SDS6	Symondshyde New Village	N											100	150	150	150	150	175	175	150	150	150	1500

						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
Settlement	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
Sites Total – Recommended sites (as above)	-	-	-	-	21	114	285	460	1125	1503	1245	959	793	785	739	732	474	382	300	316	10233	
Small Sites						1			5									8			14	
Completions	671	315	462	673	372																2,493	
Commitments						481	308					-7	24								806	
Windfall									139	139	139	139	139	139	139	139	139	139	139	139	139	1,668
Total Supply	671	315	462	673	393	596	593	460	1269	1642	1384	1091	956	924	878	871	613	529	439	455	15,214	
Stepped Target	610							985							685					15,200		