

Strategic Planning
Dacorum Borough council
The Forum
Marlowes
Hemel Hempstead
HP1 1DN

Dear

Dacorum Borough Council's New Local Plan – Consultation on the Issues and Options and Call for Sites

Thank you for your email dated 31 October 2017 in connection with the above consultation. Thank you also for agreeing to accept Welwyn Hatfield's response shortly after your closing date of the 13th December, due to the timing of the meeting of its Cabinet Planning and Parking Panel on 14 December 2017.

Welwyn Hatfield Borough Council (WHBC) would like to make a number of comments, which are set out under the relevant sections below:

South West Hertfordshire Housing Market Area and Housing Need (Q15 Q16 Q33)

The South West Herts Housing Market Area covers the whole local authority areas of Dacorum, Hertsmere, St Albans, Three Rivers and Watford. Nevertheless, there are strong housing market relationships between parts of the South West Herts Housing Market Area and Welwyn Hatfield and as a result, certain areas also fall within the defined Welwyn Hatfield Housing Market Area.

The Welwyn Hatfield Local Plan examination is ongoing but the Planning Inspector has already indicated that it is the defined Welwyn Hatfield Housing Market Area, which he considers is the appropriate basis for considering the full OAHN and the degree to which the need for housing is being met within the defined WH HMA.

We note the reference in your consultation document to the housing shortfall in Welwyn Hatfield and request that in line with the Duty to Cooperate, dialogue between Welwyn Hatfield and the South-West Hertfordshire authorities (including Dacorum Borough Council) continues to take place, on matters to do with housing land supply and the full OAHN.

Welwyn Hatfield would also reiterate the matters raised, and the previous request made, in our letter to you on 3 August 2017. Welwyn Hatfield has agreed Memoranda of Understanding with a number of authorities, including Hertsmere, to explore where opportunities may exist to accommodate any of Welwyn Hatfield's shortfall against its OAN, (both within and beyond the plan period). However, at the current time, no other authority within the Welwyn Hatfield HMA has indicated that they can assist us with the identified shortfall in Welwyn Hatfield.

Welwyn Hatfield Borough Council, The Campus, Welwyn Garden City, Herts AL8 6AE
DX 30075, Welwyn Garden City 1

Tel: 01707 357000

www.welhat.gov.uk



Accordingly, and in response to your request for early notice, Welwyn Hatfield continues to request that Dacorum Borough Council considers if it is able to assist Welwyn Hatfield with meeting some of our housing shortfall as part of its plan preparation (within the context of the SW Herts HMA).

With regards to the full OAHN for Dacorum and what is the appropriate figure, this will depend upon at what point the NPPF is updated and the approach taken to the standard methodology. If Dacorum considers it would be appropriate to use a figure derived from a SHMA, then this would need to be updated to reflect the latest population and household projections and should consider whether a higher uplift for market signals including any signs of worsening affordability would be more consistent with current practice (with reference to recent examination decisions).

Functional Economic Area and Jobs Requirement (Q20 and Q21)

The SW Herts Economic Study's definition of the SW Herts Functional Economic Market Area (FEMA), covers the whole local authority areas of Dacorum, Hertsmere, St Albans, Three Rivers and Watford. The Welwyn Hatfield evidence has identified that St Albans falls with the Welwyn Hatfield Functional Economic Market Area.

Accordingly, and in line with the Duty to Cooperate, there will need to be continuing dialogue between Welwyn Hatfield and the SW Herts authorities on matters to do with employment growth and employment land supply.

In this respect, it is generally acknowledged that employment forecasts fluctuate from year to year, and need to be kept under regular review. Account will need to be taken of economic cycles, the size of the working age population, commuting levels and provision elsewhere in the FEMA when deriving appropriate jobs targets.

Transport and accessibility (Q12)

It would be useful for this section to acknowledge that Dacorum Borough Council (alongside Welwyn Hatfield BC and other authorities) are part of the A414 Consortium, which is undertaking a study of this strategic route. The cumulative impact of growth along this corridor will need to be addressed by the transport strategy and this could have implications for the Dacorum Local Plan and Duty to Cooperate activity with other authority areas.

Waste Water (Q29)

Welwyn Hatfield notes the reference in the consultation document to specific pinch points and the need for improvements depending on the scale and location of growth. In this respect, specific reference may need to be made to capacity issues at the Maple Lodge Sewerage Treatment

(STW) and the need to accommodate the demands arising from growth in parts of Dacorum, Welwyn Hatfield and other areas within its catchment.

The Thames Water Utilities (TWU) consultation response to the WHBC Local Plan Consultation (2015) indicated that Maple Lodge STW may require significant upgrades between 2015 and 2020 and will assess whether further upgrades will be necessary between 2020 and 2025.

You may find it useful to take the above TWU response into consideration when seeking to identify the most sustainable locations for growth and assessing timescales for delivery, in light of any need for upgrades to the network or the STWs. We would also appreciate it, if you could keep us updated with any progress of your Stage 2 study and key findings of it.

Meeting the housing needs of the Traveller Community (Q18)

We note that together with Watford Borough Council, you are in the process of updating your Gypsy and Traveller Accommodation Assessment (GTAA). If this new assessment indicates that further new pitches need to be provided, you propose to carry forward the general approach of seeking new sites alongside major new housing developments. Welwyn Hatfield has taken a similar approach where it has not been possible to meet all its identified need on standalone sites.

No specific mention is made in your consultation document of Transit provision. The only (public) Transit site in Hertfordshire is located at South Mimms (within the borough of Hertsmere). This site serves the whole of Hertfordshire. Please note that the WHBC Gypsy Traveller and Travelling Showpeople Accommodation Needs Assessment (2016) has made an allowance for one pitch to be provided in Welwyn Hatfield to address a need for accommodation arising from this Transit site. Welwyn Hatfield would welcome a similar consideration within the Dacorum and Watford updated assessment in recognition of the countywide function of the Transit site. It would also welcome an ongoing dialogue (on a countywide basis) on the approach to transit provision to help facilitate travelling within the community on authorised sites.

Distribution of Growth (Q37)

We note that Dacorum considers that a new settlement would need to involve a minimum of 5,000 dwellings in order to secure sufficient infrastructure for a new settlement to be self-supporting. The option of accommodating growth through the delivery of a new settlement on such a scale has been rejected at this stage, noting that a large part of the borough is affected by sensitive landscapes (e.g. the Chilterns Area of Outstanding Natural Beauty), other areas are considered to have poor communication links and to date, no site of such a scale has been promoted to Dacorum.

Welwyn Hatfield would emphasise that it may be possible to deliver a sustainable new settlement on a much smaller scale, (i.e. a village), that accommodates 1000+ dwellings (the minimum size for a two-form entry primary school). On this basis, Dacorum may need to reconsider this as an option as part of exploring all reasonable alternative alternatives for accommodating growth against the full OAHN (and taking into account any shortfalls it has been requested to consider from other areas).

We would like to make you aware that WHBC have signed a MOUs with a number of neighbouring authorities within our HMA agreeing to investigate the potential to deliver a new garden town or village(s) for meeting the longer term needs.

Conclusion

We hope you find the above comments useful in taking your Local Plan forward to the next stage.

Please do not hesitate to contact the Planning Policy team, if you have any further queries.

Yours sincerely,

Sue Tiley

Planning Policy and Implementation Manager