

## **Appendix A**

### **Proposed response to St. Albans Local Plan Publication 2018 consultation**

#### **1. Paragraph 1.5 Duty to Cooperate Neighbours – South West Hertfordshire**

Welwyn Hatfield Borough Council (WHBC) welcomes the acknowledgement within the Plan that there is a cross boundary relationship between the two areas. Whilst Welwyn Hatfield is not part of the South West Housing Market Area or FEMA there are housing and economic market relations which have been recognised and which are specifically identified in the definition of the Welwyn Hatfield Housing and Economic Market Areas.

It is considered that the heading for this section would therefore be clearer if it simply referred to Duty to Cooperate Neighbours and then the various cross boundary relationships could be considered as they relate to different geographies.

There are a number of outstanding Duty to Cooperate issues which Welwyn Hatfield Borough Council would welcome the opportunity to address in either a Statement of Common Ground or Memorandum of Understanding prior to the submission of the St Albans Local Plan. It is recognised that at the current time it is impossible to be certain what the appropriate housing need figure for St Albans should be under the government's standard methodology and therefore the appropriateness of the housing requirement and what, if any, potential there is to meet the unmet needs of neighbouring authorities where it is practical to do so and consistent with achieving sustainable development.

It is noted that a number of key pieces of evidence have yet to be completed and therefore it has not been possible to fully assess the proposals set out in the Regulation 19 consultation. The Council has therefore made a number of holding objections which it would hope to resolve before the submission of the St Albans Local Plan for examination.

#### **2. Policy S4 Housing Requirement**

WHBC welcome the inclusions of a higher housing requirement of 14,608 dwellings, or 913 dwellings per annum (dpa) between 2020-36, within the SADC Local Plan (2018). This appears to be derived from the Government's Planning for the right homes and right places consultation document (2017) that included a proposed standard methodology for assessing housing need and indicative local authority need figures, when the Plan was approved by your Council members.

This will need to be reviewed in the light of the latest subnational household projections 2016 that were published on 20/09/2018, the unmet housing needs of neighbouring authorities within the HMA or where a cross boundary relationship exists, whether any past under/over delivery of housing should be considered prior to 2020 (as the housing need evidence is based on 2018 data using 2016 household projections), as well as any revised standard methodology that the Government introduces in November.

Welwyn Hatfield Borough Council has been tasked by the Welwyn Hatfield examination Inspector with identifying an additional 4,000 dwellings to meet the needs arising from within the borough and also to identify the need for housing and the supply within the defined housing market area.

WHBC has currently completed further analysis to the harm to the Green Belt and is in the process of assessing infrastructure constraints associated with different development scenarios. WHBC confirm that the borough may still need assistance from SADC (who fall

within the tightly defined WHBC HMA), to meet some of the unmet housing needs, depending on the outcome of this work and the Inspector's conclusions on sites currently identified in the Plan.

At the current time it is unclear to what extent St Albans City and District Council have given consideration to meeting the unmet needs of neighbouring authorities and therefore whether the plan is sound in respect of the tests set out in Paragraph 35a of the NPPF.

### **3. Policy S5 Economic Development Strategy and Employment Land Provision**

As the evidence base is being updated it is not clear to what extent the Plan is meeting the forecasts for growth and the jobs to worker ratio that will result from the policies in the Plan. Currently there are significant commuting flows between St Albans and Hatfield and it is considered this is a Duty to Cooperate issue which will need addressing once the evidence base is complete.

### **4. Policy L5 Small Scale Development in the Green Belt Settlements**

Whilst infill development which comprises the openness of the Green Belt is not necessarily inappropriate development (paragraph 145 of the NPPF) it does have the potential to conflict with justification for the settlement lying within the Green Belt (paragraph 141). The Council should therefore consider adding an additional criterion which would protect the open character of the settlement which contributes to the openness of the Green Belt. This is particularly important where the settlement lies in a fragile gap between towns.

### **5. Policy L7 Gypsy, Travellers and Travelling Show People**

WHBC welcomes the provision of additional Gypsy and Traveller pitches in the Plan. It is noted that the evidence is in the process of being updated and therefore it is unclear whether or not there are any Duty to Co-operate issues relating to the level of provision. The evidence base should take account of any need emanating from the transit site in Hertsmere. This site serves the whole of Hertfordshire. The WHBC GTAA (2016) has made an allowance for one pitch to be provided in Welwyn Hatfield as its share.

### **6. Infrastructure and Transport Strategy Policies L17 -18**

WHBC supports the requirement to make appropriate provision for infrastructure. It is noted that there will be a further run of the Comet model and that the infrastructure delivery plan will be updated. Duty to Cooperate discussions and joint work on the A414 Corridor proposals and the Growth and Transport Plans will be needed to ensure that adequate provision is being made to accommodate growth resulting from both Local Plans.

### **7. Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees**

WHBC welcomes the Green Infrastructure diagram references to green links going into Welwyn Hatfield and the identification of Ellenbrook Country Park. The Council consider that the policy would be more effective if it included a specific reference to linking Heartwood Forest with the Green Corridor identified in the Welwyn Hatfield Draft Local Plan.