



Colin Haigh
Head of Planning

Reply to: address as below
Date: 20 September 2018
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Melvyn Middleton
Examination Inspector

Dear Sir

Welwyn Hatfield Local Plan – Green Belt Study and Next Steps

I am authorised to write to you by this Council's Cabinet Planning & Parking Panel (CPPP) which met on 6 September to discuss the results of the recently-completed Green Belt Study and possible next steps.

Members would be grateful for any guidance that you may be able to offer on the likely soundness of the approaches set out below, as there is no desire to pursue a course of action that will not resolve your current concerns.

CPPP report

Officers prepared a report for members which briefly set out the current status of the Local Plan and the examination process, summarised the methodology and results of the Green Belt Study and concluded by setting out the merits and risks of two development scenarios and three approaches to identify further sites to meet our objective need for housing and thereby achieve a sound plan.

Please note however that there was no consideration of specific sites which might form the basis of the two scenarios or three approaches.

For information, a copy of the full CPPP report can be found here:

<http://democracy.welhat.gov.uk/ieListDocuments.aspx?CId=266&MId=873&Ver=4>

Green Belt Study

In respect of the Green Belt Study, one member observed that it was very objective in respect of NPPF purposes and harm judgement and pointed out that residents, parish councils and community groups could have very subjective thoughts on which bits of green belt they consider to be most important and worthy of protection in their local area.

Members generally accepted that a number of 'washed-over' villages would probably need to be released from the green belt and that some of these would have potential for housing development.

Development Scenarios

The report set out two development scenarios which will be used to test the infrastructure implications of groups of sites coming forward: (1) to contemplate extra homes on some existing allocations, the loss of some employment land and the release of some more land from the green belt; and (2) to contemplate extra homes on some existing allocations, retain as much employment land as possible and accept the release of more land from the green belt than the first scenario.

In this respect, there were mixed views. Members observed that more working-from-home could offset the need for so much employment land, whereas other members commented that the loss of employment land would harm the desirable live/work potential that currently exists in the borough and would force more people onto already congested roads and a struggling rail service in order to commute to job opportunities elsewhere.

Approaches

The report set out that there is insufficient land in the 'low', 'low-moderate' and 'moderate' harm categories to meet the objective need for housing. It also judged that whilst it might appear that there is sufficient land in the 'moderate-to-high' harm category it is unknown whether there is sufficient deliverable land within these parcels to meet the objective need for housing.

As a result the report set out three approaches to identify further sites:

Approach One is to carry out a new call-for-sites exercise, analyse these promotions and then consult on new site modifications, before progressing to the villages hearing session. Members observed that this approach is the most democratic but recognised that it would have the greatest impact on the timetable and could have an impact on the Council's five year housing land supply in the meantime.

It is estimated that this would delay the plan process by approximately 12 months to allow for: call-for-sites consultation; analysis of site suitability; infrastructure testing; sustainability appraisal; flood risk assessment; analysis of development scenarios in terms of green belt harm, infrastructure and sustainability to inform Calverton test principles for each suitable site; committee processes to select a preferred strategy and sites; six weeks of public consultation; analysis and write-up of responses; and a final decision on modifications to submit for examination, in order that hearing sessions could take place in Autumn 2019.

Approach Two is to allocate lower harm sites that have already been promoted to the Council but rejected during earlier stages of the plan-making process in the first ten years of the plan and to identify broad locations or areas of search to help meet need in the final five years of the plan.

Members noted that the NPPF states that sites should be identified in Years 11-15 (where possible) and acknowledged that the new requirement to review the plan and update out-of-date policies every five years would represent the opportunity to identify specific sites within broad locations or areas of search, which would be set out in the Local Plan.

This approach would therefore allow for a housing requirement to be set for the full plan period; specific sites for 10+ years (as some strategic sites will continue to deliver homes in the last 5 years) and set the strategy for where the remaining sites should be identified.

Members accepted that this would be quicker than Approach One as these sites are already in the public domain and there would therefore be no need for further public consultation prior to the hearing sessions. Members also noted that this could be preferable to Approach Three as it would reduce the reliance on 'high' harm sites.

It is estimated that the technical work on: updating the Housing and Employment Land Availability Assessment (HELAA); assessing the likely development potential of broad locations or areas of search, taking into account their constraints and infrastructure testing; taking account of new evidence on site delivery and cumulative impacts; and considering any necessary changes to the flood risk assessment and sustainability appraisal of sites would all be completed in the early new year if work commences now, which would allow hearing sessions on the new approach to take place in late Spring 2019.

Approach Three is to allocate the majority of sites that have already been promoted to the Council but rejected during earlier stages of the plan-making process. There would be no reliance on broad locations or areas of search. Members observed that this approach would probably result in the allocation of land that has been identified as 'high' harm in the Green Belt Study.

This approach would have a similar timetable to that of Approach Two above, which would allow hearing sessions on the new approach to take place in late Spring 2019.

Conclusions

The main observation that members made in response to all three approaches was that there needs to be a 'fine balance' between meeting the objective need for housing and protecting the green belt, both of which are key Government policies.

Members are concerned by the risk that the Council could face speculative development proposals and planning-by-appeal, and described it as a disaster if the Council were to lose its plan-making powers to another body, they also felt that they would be failing to properly serve their residents and communities if they were to just allocate as many green belt sites as necessary to deliver 16,000 homes, regardless of the value of that land, the harm it would cause to the green belt and the impact of development on already-stretched infrastructure and services.

In conclusion, members accepted that officers will start the process of analysing the cumulative impacts, transport and infrastructure implications and sustainability appraisal of the two development scenarios set out above. This will help them to understand in more practical terms where the 'fine balance' might lie.

They considered that comments on the Green Belt Study, debate on its methodology and hence debate about where the balance might lie at the next hearing session on 6-7 November would be particularly informative.

Members authorised me [the Head of Planning] to write to you [the Inspector] on the basis of the report, the merits and risks of each approach and the timetable implications of each approach.

At this stage members would be grateful for any guidance that you [the Inspector] may be able to offer on the likely soundness of the approaches set out above, as there is no desire to pursue a course of action that will not resolve your current concerns.

Yours sincerely



Colin Haigh
Head of Planning