

WELWYN HATFIELD BOROUGH COUNCIL
CABINET HOUSING & PLANNING PANEL – 13 JUNE 2016
CABINET HOUSING & PLANNING PANEL – 15 JUNE 2016 (IF NEEDED)
REPORT OF THE DIRECTOR (GOVERNANCE)

LOCAL PLAN: SELECTION OF SITES AND HOUSING TARGET

1 Executive Summary

- 1.1 The purpose of this report is to bring to Members the results of the Housing and Employment Land Availability Assessment (HELAA), to consider any policy implications associated with sites which are considered to be technically 'suitable' coming forward and the cumulative impact associated with combinations of sites and to consider which sites should be included in the Local Plan.
- 1.2 Appendix A (Employment Sites Selection – Background Paper 2016) and Appendix B (Housing Sites Selection - Background Paper 2016) to the report consider the results of the Green Belt Sites Review, the implications for defining a new Green Belt boundary, the conclusions of the HELAA, infrastructure issues, the sequential test, the extent to which the site would help to deliver strategic objectives, and the sustainability appraisal of the site.

2 Recommendation

- 2.1 That the Panel considers all of the above information to decide which sites should go forward for inclusion in the Proposed Submission Local Plan.

3 Explanation

- 3.1 The HELAA updates the previous Strategic Housing Land Availability Assessment and incorporates an assessment following the government's best practice guidance of the suitability, availability and achievability of sites promoted for both housing and employment. It is available for viewing on the Council's website. <http://www.welhat.gov.uk/article/5501/Housing>
- 3.2 The next stage of the assessment is to consider which of these sites should be included in the Local Plan for allocation taking into account the policy implications of bringing forward those sites and any cumulative impacts associated with groups of sites. In order to do this the Council needs to be clear what the 'to find' figure is for both employment and housing.

Employment land requirements

- 3.3 The Economy Study 2015 considered two different sets of economic forecasts and recommended that 5.4 hectares of additional land for Class B uses would need to be provided over and above existing designated employment land to meet the recommended hybrid scenario to 2032.

3.4 To reflect the Local Plan period, this study has a starting point of 2013 and the employment land requirements are derived from economic forecasting of jobs growth. In coming up with its recommended approach, the study considers two different sets of economic forecasts – based on Experian data and the East of England Forecasting Model (EEFM). Because it is difficult to predict which of these scenarios provides a more accurate projection of future needs, the study recommends that a hybrid approach is likely to result in a more accurate forecast. The results of the two forecasts and the hybrid approach are set out in Table 1.

Table 1 – employment forecasts, Class B floorspace need and Class B land need, 2013 to 2032

Scenario	Total jobs growth	Class B floorspace need, square metres	Class B land need, hectares
Experian	15,960	142,000	25
EEFM	17,800	133,000	22
Hybrid	16,900	138,000	23

3.5 It is notable that the Experian scenario forecasts the lowest jobs growth, but with the largest requirements for Class B floorspace and land. By contrast, the EEFM assumes the highest jobs growth, but with smallest requirements for Class B floorspace and land. This is because Experian assumes higher growth in less dense employment uses such as warehousing than does the EEFM scenario, which assumes more growth in office-based sectors of the economy. By taking an average, the hybrid scenario falls between these two extremes.

Employment Sites Selection – Background Paper 2016

3.6 A number of sites were promoted for employment or mixed use development and these have been assessed in the HELAA and the Employment Sites Background Paper. Adding those sites that are considered to be suitable for allocation in the Local Plan to existing vacant sites, sites with planning permission and recent completions, results in a capacity of 197,100 square metres of floorspace capacity. Alongside existing vacant sites, sites with planning permission and recent completions, this results in a capacity of 197,100 square metres of floorspace capacity. This figure includes the proposed development of the Holdings in Cole Green Lane, Welwyn Garden City, which was considered acceptable (subject to a Section 106 agreement) by Development Management Committee on 26th May 2016 and has been referred to the Secretary of State as a departure from District Plan policy. Sites promoted for development are set out in Table 2.

Table 2 – sites considered suitable for allocation in Employment Background Paper

Site	Floorspace, square metres
Broadwater Road West (employment elements within wider mixed use scheme)	17,700*
North West Hatfield (Hat 1)	13,900**
Marshmoor, Welham Green (WeG4b)	Up to 40,500***

*Remainder of the 19,000sq.m target set out in the Broadwater Road West Supplementary Planning Document

**Estimate taken from promoter's concept plan material

***figure generated from HELAA methodology

- 3.7 Significant losses of office floorspace have taken place since 2013 because of the introduction of permitted development rights for offices to be changed to residential. Alongside other losses of employment floorspace, and taking into account the likely future losses, it is estimated that the borough will incur losses of 80,700 square metres of employment space by 2032. This means that the net supply of employment floorspace (197,100 minus 80,700) is 116,400 square metres, some 21,600 square metres short of the requirement of 138,000 square metres set out hybrid scenario in the Economy Study, which would theoretically constrain the amount of jobs growth that could take place to about 14,500.
- 3.8 But it should be noted that economic projections are always subject to considerable uncertainty, which increases the further into the future they are made, and that changes in the number of jobs do not always relate directly to changes in floorspace. Provisional government estimates (Business Register and Employment Survey, Office for National Statistics, 2014 and 2015) indicate that the number of jobs in Welwyn Hatfield increased by 2,600 from 2013 to 2014 despite a small net reduction in the amount of employment floorspace at that time. Adding the likely total number of jobs that could be accommodated in the supply of employment floorspace to the number of jobs that have already been created since 2013 gives a total jobs growth of about 17,100, which is very similar to the 16,900 total jobs figure recommended in the hybrid scenario in the Economy Study 2015.
- 3.9 Such an outcome would overshoot the number of jobs envisaged in the Experian forecast (15,960), which require more land and floorspace than the hybrid forecast. In land and floorspace terms, the outputs of the EEFM forecast could be achieved, but the number of jobs generated would be higher than the hybrid scenario, which might put a further upward pressure on the number of additional dwellings the Council needs to plan for. It is the hybrid scenario which was recommended by our consultants to take forward into the Local Plan.
- 3.10 In combination with our monitoring data and the recommendations of the Economy Study, this uncertainty about the relationship between jobs growth and employment floorspace, and hence the amount of land required for employment uses, means that it is important that existing reserves of employment land are, as far as possible, retained in Class B uses.
- 3.11 On this basis, land promoted within our designated employment areas for residential development would need to be retained in Class B uses to ensure

there is a sufficient supply of employment land for the plan period to meet the hybrid scenario. It is for this reason that land already in employment uses at Woolmer Green has been identified in the Employment Sites Background Paper as being suitable for allocation in the Local Plan.

The relationship between the Objective Assessment of Need (OAN) for housing, the Economy Study and the Housing Target

- 3.12 The Partial Update of the SHMA 2015 reviewed the OAN in the light of household projections published by DCLG and economic forecasts from the East of England Forecasting Model. Following the completion of the Economy Study in December 2015 demographic projections have been produced of the Experian and Hybrid scenarios. The data includes an analysis for dwellings associated with jobs, dwellings associated with employed people (to take account of part time work and double jobbing and to take account of increasing household formation rates to allow for the rates of young people forming a new household to return to pre-recessionary levels (headship rate adjustment).
- 3.13 A strategy based on the hybrid economy study scenario would indicate the dwelling numbers as set out in Table 3 ranging from 633 dwelling per annum for employed people to 736 dwellings per annum.

Table 3 Hybrid Dwelling/jobs Scenarios

Scenario	Dwellings per annum	Plan period total
Hybrid employed people	633 dpa	12,027
Hybrid jobs	701 dpa	13,319
Hybrid employed people adjusted	667 dpa	12,673
Hybrid jobs adjusted	736 dpa	13,984

- 3.14 The Council’s consultants Turleys have reviewed the update to the Economy Study and consider that an OAN of 12,616 – 13,433 homes as recommended in the 2015 Partial Update of the SHMA is still appropriate. This would accommodate the first three Hybrid scenarios but would represent a 16-23% uplift above the 2012 DCLG household projections. The DCLG household projections along with the ONS household projections are the starting point for the calculation of the OAN. Whilst matching jobs to housing is a laudable sustainability objective in practice this is hard to achieve. Given the variability of economic forecasts and the fact that national forecasts for economic growth have become more pessimistic over the last few months a housing target so far above the demographic projections might be considered to be a risky strategy as this could result in an imbalance between the provision of jobs to housing.
- 3.15 It is only just over a year since the previous Economy Study 2014 suggested there would be 12,000 jobs over the plan period resulting in a lower OAN of around 625 dwellings per annum and previous forecasts have indicated both lower and higher estimates for the growth in jobs. The close proximity to London, the inability of Stevenage to provide sufficient jobs and allocate sufficient employment land over its plan period and complex commuting patterns that exist in the borough means that whilst estimates can be made, there can be no

precise relationship between new housing and jobs. This is because the exact quantum by which employment growth increases the demand for housing requires assumptions to be made about the number of jobs which would be filled by residents already living in the area (either unemployed or working elsewhere), by people who live elsewhere but would commute in and by people who choose to move into the area to live and work.

- 3.16 The latest set of 2014 based ONS population projections, published on May 26th and, have revised population forecasts upwards for Welwyn Hatfield, with an increase in the population of 4,000 more than the previous projection for the plan period. These have not yet been translated into household figures by DCLG but a rough calculation would indicate that the household projections would now fall within the OAN range and there would be no uplift.
- 3.17 Official population forecasts are normally considered to be robust by the Planning Inspectorate, however this latest set does come with a health warning for those authorities with high student populations. Welwyn Hatfield is home to both the University of Hertfordshire and the Royal Veterinary Collage.
- 3.18 Affordability is an issue that is factored into the setting of an Objective Assessment of Need and high house prices and a high need for affordable housing is one of the reasons our OAN includes an uplift over and above our 2012 based population and household figures. The Strategic Housing Market Assessment identified a need for 10,243 affordable homes over the plan period based on a definition which did not include starter homes. Viability evidence indicates that we would not be able to secure more than 25-35% of dwellings as affordable dependant on their location. Taking into account the Housing and Planning Act requirements that 20% of all housing on eligible sites is for starter housing this would leave between 5-15% of homes on eligible sites for more traditional forms of affordable housing and would mean that we would need to set a target of around 44,150 dwellings to meet this need, which is clearly undeliverable.
- 3.19 House prices are influenced by a number of factors not just supply. The 2015 SHMA has analysed changes in house prices between 2001 and 2014. This indicates that average house prices have not risen as much as they have nationally although house prices are higher than the national average.
- 3.20 Historic data from CLG for this borough indicates that the ratio of lower quartile house prices to lower quartile earnings did not fall when housing completions were at their highest in the borough between 2003/04 -2007/08. The Local Plan will have no influence on earnings and the evidence indicates that even at times of highest developer activity the ratio between house prices and earnings are not necessarily affected by building more homes.
- 3.21 Our consultants consider that a target at the upper end of the range would better meet the needs of the economy and address affordability. However, given the variability of economic forecasting the difficulty local planning authorities now have in protecting employment land to meet longer term need, the unlikelihood of the Local Plan being able to make a significant impact on affordability ratios and the latest population projections it is considered that a target at the lower end of the OAN would best meet the needs of the borough and would represent a considerable increase in the supply of housing.

- 3.22 However before a target can be set in the Local Plan consideration has to be given to the implications of meeting this need for other policies set out in the NPPF. These issues are addressed in the following paragraphs.

Completions, windfall and permissions

- 3.23 Monitoring of this year's completions indicates that house building rates continue to rise in the borough. Analysis of our future supply from windfall sites indicates that this allowance can be increased to an average of 80 dwellings per annum to allow for: the change in legislation with regards to prior notification for office to residential; proposals for a significant increase in the number of residential units which could be provided in and around Hatfield Town Centre; and updating the analysis of trends from other sources.

Table 4 sources of supply – completions, permissions and windfall

Source	Dwelling nos.
Completions 2013-2016	1,057
Under construction	793
Permissions*	670
Windfall Allowance	1,385
Total	3,905
To find, against lower and upper OAN	8,711 – 9,528

*Including 2.5% non- implementation rate

The Housing & Employment Land Availability Assessment (HELAA)

- 3.24 Officers have now updated the assessment of the availability suitability and deliverability of sites including new sites submitted in response to the Local Plan consultation.
- 3.25 This results in a potential capacity of 11,789 homes as follows:

Table 5 Potential Supply

Source	Dwelling nos.
Small sites 5-10	26
Urban sites 11+	2,012
Safeguarded Land	650
Green Belt	9,101
Total	11,789

- 3.26 At first sight this would indicate that the Council could more than meet the OAN if it releases land from the Green Belt. The NPPF requires local planning authorities to plan positively for growth unless harm to other objectives in the NPPF outweighs the benefit. Paragraph 182 of NPPF also requires the Council to consider whether the borough could meet the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with the principles of sustainable development. Whilst sites have been assessed on an individual basis they now need to be considered in terms of the potential distribution and their cumulative impact on infrastructure, other sustainability considerations and the harm to the Green Belt.
- 3.27 To recap on the preparation of the plan in 2009 the Council consulted on a number of options for distributing growth around the borough as follows
1. A proportionate approach (PG31);
 2. Growth focused around Welwyn Garden City (PG32a);
 3. Growth focused around Hatfield (PG32b);
 4. Growth focused around Welwyn Garden City and Hatfield ((PG32c);
and
 5. Growth focused around the towns and large scale expansion of one or more villages (PG39 to PG46)

A further option was subsequently identified in 2012 at the time of the Emerging Core Strategy:

6. Growth mainly focused on Welwyn Garden City and Hatfield with limited growth around the borough's large excluded villages.
- 3.28 The Emerging Core Strategy 2012 consulted upon an approach based on growth focused around the two towns. However the response to this consultation expressed the view that growth should be distributed more 'fairly around the borough' and the growth in the quantum of housing that needed to be accommodated resulted in the Local Plan Consultation Document 2015 proposing a more dispersed approach to the distribution of housing in and around the towns and villages.
- 3.29 Whilst Local Plan consultations have produced mixed responses as to which are the best performing sites that should be included in the Local Plan, there was more support for a dispersed approach to the distribution of growth. Furthermore because of the lack of urban capacity within the villages the Sustainability Appraisal carried out at the time of the Emerging Core Strategy concluded there were more advantages than disadvantages to the dispersed approach as it would allow for local housing need to be met and would help to sustain community facilities.
- 3.30 In addition NPPF paragraph 84 states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset with the Green Belt or towards the locations beyond the outer Green Belt boundary.

- 3.31 The towns and the villages which are excluded from the Green Belt are the most sustainable settlements and are therefore considered to offer the best opportunity for a sustainable pattern of development.
- 3.32 Consultation responses also asked the Council to consider the potential for a new settlement. A proposal for a new village at Symondshyde was submitted in response to the Local Plan consultation and this has been assessed to consider if it offers an opportunity for sustainable development. Members should note that a petition has been received objecting to the location of this new settlement. Representations have also been received expressing concern in relation to a number of the new sites submitted last year.
- 3.33 Appendix B to this report contains an assessment of sites on a settlement basis. The new settlement is considered within the Rural Areas section of the report. It considers the result of the HELAA, the impact on the purposes of the Green Belt and the Green Belt boundary, the Sustainability Appraisal of sites, the Sequential Test and an analysis of strategic advantages and disadvantages associated with sites. It identifies sites which are considered to be selectable and sites where it is considered the harm outweighs the benefits associated with a site coming forward.

Housing Sites Selection - Background Paper

- 3.34 The background paper includes an assessment of the conclusions of the HELAA and any requirements for mitigation, the impact on the purposes of the Green Belt, and an assessment of the impact on the Green Belt boundary, the conclusions of the sequential test relating to flood risk, the interim results of the sustainability appraisal matrices and finally any strategic advantages or disadvantages not covered in the other criteria. The assessment weights the impacts which range from significant in favour to significant against this is discussed in the paper. This allows for conclusions to be drawn as to whether the harm outweighs the benefits of bringing forward sites.
- 3.35 Infrastructure issues which might constrain the level of growth in any settlement are also considered. In the main these relate to the provision of schools at both primary and secondary level. Transport modelling indicates that whilst there are no “show stoppers” as such, that there will need for mitigation and considerable investment in measures to improve the capacity of the network.
- 3.36 All sites being considered for allocation have passed the sequential test.
- 3.37 Based on the balancing exercise the background paper sets out which sites are considered to be suitable for allocation and which ones are not. The majority of urban sites are considered to be suitable for allocation. The only exception is the Woodside Centre in Welwyn Garden City which currently provides an important community facility for which no alternative provision has been identified.
- 3.38 Based on this assessment, urban sites could deliver a capacity of 1,973 homes over and above those sites with planning permission. Safeguarded land would deliver an additional 650 dwellings at Panshanger but it is considered that there is some potential to amend the Green Belt boundary to more closely follow the sites topography and the site itself has capacity for 725 dwellings. Proposals to provide a realigned runway alongside housing have also been considered in the HELAA. A third party has promoted the concept of a retained but moved runway on the site so that an air sports facility could be reinstated. It has been suggested that the capital costs of any associated infrastructure would be covered by the

third party and/or their benefactors. An analysis of the commercial viability of an air sports facility has been reviewed by an independent consultant on behalf of the Council. This indicates that it could cover revenue costs and generate a profit, but the profit would not be enough to generate a reasonable return on the capital investment.

- 3.39 Table 6 indicates that this represents a significant shortfall on the Objective Assessment of Need and the demographic projections. Therefore it is considered that exceptional circumstances do exist to release land from the Green Belt.

Table 6 capacity from urban sites

Source	Dwelling nos.
Completions	1,057
Sites under construction	793
Sites with planning permission	670
Capacity from urban sites within the HELAA	1,999
Safeguarded land	650
Total	5,169
Windfall	1,385
Total	6,554
Shortfall, against lower and upper OAN	6,062- 6,879

- 3.40 As stated above in paragraph 3.40 infrastructure issues relating to the provision of schools constrain options for how much growth can be accommodated in any one settlement or group of settlements.

- 3.41 The OAN would indicate that three secondary schools need to be provided to meet the level of growth identified in the OAN. Two sites have been identified at HAT1 North West Hatfield and Birchall Garden Suburb within East Herts. Whilst existing secondary schools could be expanded Hertfordshire County Council as the local education authority considers this is required in the main to meet the growth in the school population currently coming through primary schools. The County Council consider that an additional secondary school needs to be provided within or around Welwyn Garden City and have commissioned consultants to carry out a search for a site but this work has not yet reported. A criterion based policy could therefore be included in the Local Plan which could indicate the need for a secondary school and how applications would be assessed. As such, this should not constrain sites coming forward within the north of the borough.

- 3.42 Primary school provision constrains opportunities for development in the following settlements:

- a) Welwyn village - listed building status may restrict capacity of school to expand

- b) Welham Green - lack of opportunity for school to expand because of proximity to ancient woodland and wildlife site.
- c) Brookmans Park - existing school can be expanded to accommodate half a form of entry.
- d) Welwyn Garden City - a new primary school would be required to meet development arising in the south of Welwyn Garden City for which a site has yet to be identified.

3.43 Based on the overall assessment, sites offer opportunities to bring forward 5,394 dwellings when infrastructure constraints and harm to the Green Belt are taken into account but as set out in Table 7 this would still fall short of the OAN.

Table 7 Sources of capacity identified in the Background Paper

Source	Dwelling nos.
Completions	1,057
Sites under construction	793
Sites with planning permission (less 2.5% non-implementation rate)	670
Capacity from urban sites within the HELAA	1,999
Safeguarded land	650
Green Belt	5,394
Windfall	1,385
Total	11,948
Shortfall, against lower and upper OAN	668-1,485

3.44 Consideration therefore needs to be given as to whether any of the sites where it is considered the balance weighs against them on policy grounds could be selected for inclusion in the Local Plan in the light of the likely shortfall.

3.45 Only Woolmer Green and Little Heath currently meet their notional target.

3.46 Infrastructure constraints result in Welham Green and Brookmans Park not being suitable for any further development. At Woolmer Green, Oaklands and Mardley Heath and Welwyn there is a degree of uncertainty as to whether further growth than that already found suitable could be supported by the necessary primary school capacity. In Welwyn Garden City there is only one urban site which has been considered unsuitable on the basis that it provides an important community facility with no suitable replacement facility identified.

3.47 Members may therefore wish to consider whether sites around Cuffley or Hatfield could be included in the list of sites to be allocated. These include Cuf4 and Cuf5, Hat2, Hat5, Hat11 and Hat19.

- 3.48 Cuf4 and 5 - The potential 660 dwellings associated with alternative sites Cuf4 and Cuf5 (could be higher as promoter of Cuf5 has submitted an application for 493 dwellings and 115 retirement units), which would need to come forward together to form a logical Green Belt boundary; when considered alongside other sites that have been assessed as suitable for allocation (299 on urban and Green Belt sites); together with completions since 2013 (32); and urban sites with planning permission (85) would amount to growth of 1,076 dwellings. This would be an increase of around 57% in the number of dwellings in Cuffley. This is considered to represent a significantly disproportionate level of growth to an excluded village and would be contrary to the settlement strategy.
- 3.49 In addition, when the potential for overall housing growth at both Cuf4 and Cuf5 is considered alongside other more suitable sites around Cuffley, the highway authority has indicated that the operation of the Plough Hill/Station Road/Northaw Road junction is a possible area for concern, with the potential for this junction to be over capacity even with a change in priority.
- 3.50 Hat5 – This site was promoted alongside Hat4 which has been found unsuitable in the HELAA due to its impact on heritage assets. This results in the site being poorly connected to the urban boundary. Access would be across a flood zone 2 and 3 but no objections have been received from the Environment Agency, the Highways Authority or the Fire and Rescue Service at this stage. Part of the site is also within flood zone 2 and 3 which would mean the developable area would have to be reduced. In addition if the site were selected then the impact on the Green Belt and the gap between Hatfield and Smallford would need to be carefully considered with the result that the developable area would need to be constrained to an area that did not project any further westwards than the existing urban area. Therefore the capacity of the site should be reduced to around 100 homes. Delivery would be at the end of the plan period due to landowner intentions.
- 3.51 Hat11- scenario 1 involves a developable area of around 6 hectares with an estimated dwelling capacity of 120 and scenario 3 involves a larger site of around 12.5 hectares (mixed use) with the potential for no greater than 300 dwelling equivalents due to highway constraints. Whilst the site has been found suitable, available and achievable in the HELAA, in the Housing Sites Selection Background Paper consideration to the impacts of the site on the Green Belt. The site is located within a fragile gap between Hatfield and Welham Green although the gap is already partly compromised by the presence of existing development. The site provides a strong visual and physical barrier between the two settlements and development of this site would significantly reduce the gap between settlements. Scenario 3 has a greater impact on the Green Belt than scenario 1 due to its larger scale. In addition scenario 1 promotes a landscape belt which would mitigate the visual impact of the development.
- 3.52 Adjoining the site is an area of land in the same ownership which was identified in the Local Plan Consultation Document 2015 as a potential extension to the existing cemetery. An alternative site for a cemetery was also identified in the Local Plan Consultation Document but the landowner of this site has now confirmed that land there will not be available. The Local Plan Consultation Document indicated that based on current mortality rates and preferences for burials, as opposed to cremations, the borough is expected to have run out of burial space towards the end of the plan period.

- 3.53 Hat19 – This a smaller part of the original HAT3 site and whilst it would have less impact on the Green Belt than the larger HAT3 it would still reduce the fragile gap between Hatfield and Smallford although the impact would be less than 10%. Due to heritage, ecological and other environmental constraints the capacity of the site is limited to around 20 dwellings only.
- 3.54 Hat2 is not considered to be suitable for delivery during the plan period. It could be considered as providing an opportunity to safeguard the land to meet longer term needs but there is uncertainty as to whether the legal issues relating to the S.106 could be overcome.
- 3.55 Officers will consider whether further windfall assessment can be included as a consequence of emerging proposals for sites in and around Hatfield Town Centre.

4 Link to Corporate Priorities

- 4.1 The Council's Business Plan 2015-2018 contains corporate priorities to meet the borough's housing need, help build a strong local economy, protect and enhance the environment and maintain a safe and healthy community.

Implications

5 Legal Implication(s)

- 5.1 The Localism Act 2011 introduced the Duty to Co-operate. This is a legal requirement which the examination of the Local Plan will need to consider. The delivery of the housing and jobs needed in an area has been identified in the NPPF as a strategic issue which has Duty to Co-Operate implications.

6 Financial Implication(s)

- 6.1 There are no financial implications arising directly as a result of this report but there could be financial implications which arise for the cost of the examination in the event that the examination were to be adjourned for further work to be carried out or additional consultation needed to take place.

7 Risk Management Implications

- 7.1 The requirement to have prepared a Local Plan by early 2017 makes it critical that progress is made on moving forward with the Local Plan to adoption at the earliest opportunity.
- 7.2 However there is a risk of the Local Plan being found unsound if it is not justified by the technical evidence; if it does not result in a deliverable strategy or if it does not meet the legal tests relating to its preparation which include the Duty To Co-operate.
- 7.3 There is a risk of the Local Plan being found unsound if it does not meet the Objective Assessment of Need unless the Council can demonstrate the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of doing so when against the policies in the National Planning Policy Framework either when taken as a whole or where specific policies indicate development should be restricted.

- 7.4 There is a risk that Duty to Cooperate bodies will object if the Local Plan does not meet its Objective Assessment of Need.
- 7.5 If the Local Plan is considered to be unsound by the Planning Inspector because it has not met the OAN he/she may require that modifications are made to the plan with additional sites being added to the plan in order to reach a target which meets the OAN.

8 Security & Terrorism Implication(s)

- 8.1 There are no security and terrorism implications arising directly as a result of this report.

9 Procurement Implication(s)

- 9.1 There are no procurement implications arising directly as a result of this report.

10 Climate Change Implication(s)

- 10.1 The selection of a target and which housing and employment sites should come forward will have implications for climate change. These have been assessed in the site appraisals and will be considered in the Sustainability Appraisal Report. Sites which are well located to public transport and close to services and facilities will have less impact on climate change than those sites which are more remote.

11 Policy Implications

- 11.1 In accordance with the NPPF the Council's Local Plan must seek to deliver sustainable development and be based on a sound evidence base. It should meet the full OAN for housing in the market area where this is consistent with other policies in the plan.
- 11.2 Establishing the OAN is the first step in deciding what an appropriate housing target is for the Local Plan. The SHMA does not consider the supply of land, infrastructure or environmental constraints, all of which need to be taken into account when setting a housing target in the Local Plan. If the adverse impacts of meeting the OAN would outweigh the benefits, then the Council will need to set out what those adverse impacts are.
- 11.3 If Welwyn Hatfield is unable meet its OAN, it will need to enter into the duty to cooperate with those authorities within the defined Housing Market Area and possibly the wider Housing Market Area and beyond.

12 Equalities and Diversity

An Equality Impact Assessment (EIA) not been carried out in connection with the recommendations in this report. Part of the role of the Sustainability Appraisal is to consider the impact of the Local Plan on social issues.

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Appendices

Appendix A Employment Sites Selection – Background Paper 2016

Appendix B Housing Sites Selection - Background Paper 2016

Background Papers:

Housing and Employment Land Availability Assessment 2016-06-03

Welwyn Hatfield SHMA Partial Update 2015

Welwyn Hatfield SHMA Partial Update Addendum: Responding to the Economy Study Update (April 2016)

Welwyn Hatfield Economy Study Update 2015

Welwyn Hatfield Economy Study 2014