

Statement

Matters and issues for examination (part 1)

15267521/Land owner of Hornhatch Farm

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Plan preparation (1). Is the sustainability appraisal adequate?

1. The role of sustainability appraisal is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives (PPG, 11-01-20140306). The process can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met (PPG, 11-01-20140306). Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence [...] (158, NPPF).
2. The evidence underpinning the plan includes the Green Belt and Countryside Study ('the Green Belt Study').
3. The Green Belt Study is inadequate because the methodology for identifying, and the resultant extent of, the land parcels does not provide a robust basis on which to assess how land in each parcel contributes to the purposes of green belts. For example, the Green Belt Study states that the boundaries of each land parcel are demarcated by visible landscape features such as woodlands, hedgerows, roads and railway infrastructure (7.3, Volume II). This was to ensure that if a land parcel was deemed suitable for development, it would be physically and visually contained and the Green Belt would represent a clear defensible boundary (7.3, Volume II). However, there are a number of land parcels that can be subdivided further into smaller physically and visually contained parts meaning that any assessment of the degree to which each land parcel contributes to the purposes of the Green Belt is flawed.
4. For example, land parcel E51 (appendix 2, Green Belt Sensitivity Map) is split into two parts on either side of existing housing. The splitting of this land parcel does not follow identifiable landscape features and consequently does not result in a single parcel of land that would be physically and visually contained. This means that it is not possible to make an assessment of the degree to which land parcel E51 contributes to the purpose of the Green Belt because it is not physically and visually contained. In other words, the parcels of land are at such a level as to render their findings on the extent of potential harm to the purposes of the Green Belt debatable.
5. A similar issue has recently arisen at the current examination of the Welwyn Hatfield Local Plan. The Inspector into that plan issued a note in December 2017 saying that he thought that the development strategy put forward is unsound because, in part, there was insufficient justification for the failure to identify sufficient developable sites with the Green Belt. This is largely because of the differing characteristics of land within each identified land parcel. In this case, the Inspector said that 'it goes without saying that a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt. Such an approach is also more likely to reveal opportunities as well as localised constraints, both of which might reasonably be considered further'. Welwyn Hatfield Borough Council is now carrying out a more detailed review of green belt sites within each land parcel in response to the Inspector's comment that 'unless all of the Green Belt has been forensically analysed in some detail then it [that there are no exceptional circumstances justifying a further release of additional land from the Green Belt] is difficult to prove.
6. Returning to the question of whether the sustainability appraisal is adequate, it follows that it too is inadequate as it classifies some sites as being within red-rated green belt on the basis of the inadequate analysis in the Green Belt Study. A more forensic and finer grained

approach to green belt land would demonstrate that some sites in the green belt are less sensitive than their wider land parcel meaning that there may be exceptional circumstances justifying a further release of additional land from the green belt.

7. In our opinion, the actual development strategy finally arrived at is a matter for the Council, providing it is arrived at in a way that is objective and rational. However, if that strategy fails to deliver a five-year housing land supply and assuming that all realistic development opportunities outside of the green belt have been put forward in the plan then it must be demonstrated that all of the green belt has been forensically analysed and accurately reflected on a site by site basis in the sustainability appraisal in order to conclude that no additional land can be released. Consequently, we believe that the Council should be asked, as Welwyn Hatfield Borough Council was, to carry out a more detailed review of the potential to sub-divide land parcels to see whether any land could be released for housing to ensure that a five-year housing land supply can be delivered.

Unmet need in the housing market area (HMA)(3). Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA?

8. The Land Availability Assessment demonstrates that the supply of housing land is 14% greater than the OAN over the lifetime of the plan and a more forensic analysis of the green belt may demonstrate that housing land supply could increase further still. The Council argues that this buffer of 14% is not overprovision but instead it is necessary to ensure that the total requirement can be met. Consequently, there are no sound reasons why the additional supply over the plan period cannot be an allowance for unmet housing need arising elsewhere in the HMA. Without making an allowance for unmet requirements from neighbouring requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development the plan would fail the test of soundness of being positively prepared (182, NPPF).

Housing trajectory (4). Is the plan's housing trajectory, which starts at a low level and rises towards the later years of the plan period, a sound basis for meeting housing need?

9. The housing targets should describe how the local authority will maintain delivery of a five-year supply of housing land to meet their housing target (47, NPPF). In addition, where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%. The Council does not currently have an up to date housing number in the adopted development plan. The interim housing number of 322 homes a year (agreed in May 2012) does not take account of an up to date assessment of need. The latest Annual Monitoring Report, November 2017, shows that there has been record of persistent under delivery of housing. The OAN in the Joint SHMA Guildford Addendum 2017 is 654 dwellings per annum. The housing trajectory proposes a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. The targets do not meet current annual housing needs until 2026 (seven years from the date from adoption). This means that a five-year supply of housing is unlikely to be met. The NPPF makes clear that relevant policies for the supply of housing should not be considered up to date if the authority cannot demonstrate a five-year supply of deliverable housing sites (47, NPPF).
10. A more forensic analysis of the green belt may identify an additional supply of deliverable sites sufficient to provide five years' worth of housing against housing requirements.

Five-year housing land supply (5). Is the methodological basis for calculating the five-year housing land supply sound? How many years' supply of deliverable housing land exists at present, having regard to the housing trajectory, the current supply position and the plan's housing allocations? Is the plan resilient and flexible enough to maintain five or more years' supply of deliverable housing land going forward?

11. The housing trajectory anticipates that net completions will exceed annual housing targets for the first five years. An allowance for windfalls are included in the first five years, however, no compelling evidence in Appendix D of the Land Availability Assessment is shown that such sites have consistently become available in the local area and will continue to provide a reliable source of supply (48, NPPF). The first five years supply is also heavily reliant on large scale urban extensions that do not have planning permission. If the plan is adopted in 2019 then these sites are unlikely to start delivering homes in the numbers included on the trajectory within the first five years. In addition, the draft NPPF states that local plan reviews should be completed no later than five years from the adoption date of the plan (23, draft NPPF). At that time, the Government's standard method for calculating housing need may be in place, which indicates that the Council's housing need is 789 units a year, which following an update to household projections may well be higher still. In short, targeting housing growth to the latter part of the plan period is failing to address current housing needs and may not even meet future needs following a first review of the plan.

Spatial strategy, green belt and countryside protection (9). Is the spatial strategy as set out in the preamble policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period? Having regard to the need for housing, does the plan direct it strategically to the right places? Is the overall amount of land proposed to be released from the green belt, and the strategic locations for green belt release, justified by exceptional circumstances? If the plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?

12. Draft policy S2 sets out the plan's housing target but it does not explain the Council's settlement strategy. Consequently, there is no clear reasoning that the authority has prepared the local plan with the objective of contributing to the achievement of sustainable development (section 39 of the Act), including reducing the need to travel and promoting sustainable modes of transport. In that respect, draft NPPF states that where it has been concluded that it is necessary to release green belt land for development, plans should give first consideration to land which has been previously developed and/or is well served public transport (137, draft NPPF). This means that in the green belt first consideration should be given to expansion in settlements like Chilworth, Clandon and Effingham Junction that are already served by an existing railway station.
13. The release of land from the green belt is justified by exceptional circumstances, however, a more forensic analysis of the green belt is likely to identify additional sites that are developable within the first five years; not subject to other strategic constraints; and reflect a sustainable pattern of development (i.e. well served by existing public transport and local services). Consequently, the overall amount of land released from the green belt could be increased in the first five to years to meet the shortfall in need prior to the delivery of the strategic sites in the mid to latter parts of the plan period.
14. If the plan had to accommodate a greater housing requirement then this could be achieved

within the objective of contributing to sustainable development by undertaking a finer grained approach to the assessment of the potential of sites in the green belt in settlements that are well-served by public transport, such as Chilworth, Clandon and Effingham Junction. In our view, the potential of Chilworth to increasing the supply of housing in the first five years of the plan has not been adequately assessed and that is, in the main, a result of inaccurate land parcelling at the green belt review stage in 2014 despite the Sustainability Appraisal recognising the settlement's positive sustainability credentials.