

## **Welwyn Hatfield Borough Council**

### **Stage 2 Examination**

#### **Statement of Mr Neil Bedford**

##### **1. Housing Market Area**

No Comment

##### **2. Full Objectively Assessed Housing Need**

The Council was made fully aware in its SHMA Update April 2016 that its OAN was in a recommended range of 664 to 707 new dwellings per annum (Figure 1.1 page 2) with an elevated need (Figure 2.4 and paragraph 2.23 page 8 and 3.2 page 12) at 736 new dwellings per annum to take into account household formation for those aged 20 to 29 and jobs growth.

The SHMA recommended (paragraph 3.10 page 14) that the OAN should be at the upper end of the range at 707 new dwellings per annum. Over a 20 year plan this would be 14,140 new dwellings.

The SHMA update in April 2016 was in the Council's possession before it considered site allocations in June 2016 and before Regulation 19 consultation.

For reasons, which the Council does not explain, it decided to adopt a housing target of 632 new dwellings per annum over a plan of 19 years. This set a housing target of just 12,000 new homes.

The SHMA update in May 2017 has increased the OAN to 800 new dwellings per annum. This would be 16,000 new homes over a 20 year plan.

**Action:** The Council should adopt a minimum OAN of 16,000 new dwellings for the period 2013 to 2033.

### 3. Employment Forecasts

The Council is aware (paragraph 2.17 of Hou/22) that the failure to meet the borough's OAN will adversely affect younger people, with the consequence (paragraph 2.18) that the planned level of housing provision would result in a more limited growth in the working age population.

**Action:** The Council should adopt a minimum OAN of 16,000 new dwellings for the period 2013 to 2033.

### 4. Green Belt Review

The Council's Stage 2 Green Belt Review was undertaken by the Council's Officers. It has not been subject to any public consultation. The Stage 2 Review is inconsistent. Sites which are most suitable have not been allocated and sites which are less suitable have been allocated.

Examples of inconsistency:

1. BrP7 (which is in Little Heath not Brookmans Park) is an exposed site at a high point in the borough with substantial visual impact. The Council's own Stage 2 Green Belt Review states [Purpose Assessment 5]:

***"The gap between Little Heath and Swanley Bar would disappear if this site were developed".***

The Green Belt boundaries to the north and west of BrP7 are very weak. The site is located in the gap between Brookmans Park and Potters Bar. Little Heath has no shops and no services.

2. BrP6, BrP9 and BrP10 are all adjoining the southern part of the highly sustainable village of Brookmans Park. These sites are all below the topographical ridgeline between Brookmans Park and Potters Bar, with less openness and less visual and physical impact than BrP7. These sites have strong Green Belt boundaries. There are shops and services, a railway station and schools in Brookmans Park.

In respect of BrP6, BrP9 and BrP10, The Council states in its Stage 2 Green Belt assessment:

***“In combination with other sites around Brookmans Park and Welham Green these sites could have a substantial impact on the strategic gap between Potters Bar and Hatfield”.***

The Council has not allocated BrP6, BrP9 or BrP10, but it has allocated BrP7, which is within the same “strategic gap”. BrP6, BrP9 and BrP10 would contribute a significantly greater number of homes than BrP7, whilst causing less harm to the Green Belt, in a more sustainable location.

3. BrP4 is to the west of the main railway line. In its Housing Distribution Paper (Hou/6 - Part 2 page 35) the Council said:

*“A major landowner has more recently promoted a smaller amount of development on land immediately to the west of the village (BrP4) with an estimated capacity of around 550 dwellings (at 25 dph). The landowner sees expansion to the west as a logical extension to the village. The area to the west would be separated from the rest of the village by the railway and only accessible via a narrow road over a bridge on a tight bend. The landscape in this area has been assessed as having medium to high sensitivity to change and low capacity to accommodate new development. Development to the west of the railway line would result in urban encroachment into the countryside and have a significant impact on*

*openness. Development on this scale would represent major growth, disproportionate to the size of the existing village.”*

**Council Conclusion in Hou/6:**

***“The area to the west of the railway line is not considered suitable to take forward as a village extension (BrP4)”.***

**[The Council underlined the word “not”].**

In the Council’s 2012 SHLAA, BrP4 failed because it was considered:

***“Detached from Brookmans Park by the railway and only accessible via a narrow road bridge on a tight bend”.***

In the Council’s 2014 SHLAA, BrP4 failed again. The Council’s assessment concluded:

**BrP4**

***“Openness/visual: High”***

***“Openness/physical: High”***

***“High Sensitivity/Low Capacity”***

***“New Green Belt boundary would be weaker than existing”.***

Against the history of clear and well-reasoned rejection of BrP4, the Council’s June 2016 HELAA inexplicably found BrP4 “suitable, available and achievable” but does not mention anywhere that the site is “detached” from Brookmans Park, that the proposed Green Belt boundaries will be significantly weaker, that the site has a high sensitivity and low capacity or that there is “High” visual and “High” physical openness. The HELAA contains no assessment of any harm to the Green Belt in respect of BrP4. The Green Belt impact at BrP4 is simply ignored, yet Green Belt harm is used a reason not to allocate BrP6, BrP9 and BrP10.

From all reasonable analysis, BrP4 and BrP7 were only allocated by the Council because they are outside of Brookmans Park, which does not comply with paragraphs 83, 84 and 85 of the NPPF.

**Action:** The Council should allocate BrP1, BrP6, BrP9, BrP10, BrP12, BrP13 and BrP14 (total of 778 new dwellings – based on HELAA).

BrP4 and BrP7 (Little Heath) are not suitable for allocation (total of 350 dwellings – SADM 33 and 34).

## **5. Green Belt Exceptional Circumstances**

The Council has established that “exceptional circumstances” do exist in accordance with paragraph 83 of the NPPF. The exceptional circumstances are supported by strong social, economic and environmental reasons.

Having established that exceptional circumstances do exist for the release of land from the Green Belt, the Council should select those sites which cause the least harm to the Green Belt, in locations which are most suitable and sustainable. The Council has not been objective or consistent in that selection process.

**Action:** The Council should allocate BrP1, BrP6, BrP9, BrP10, BrP12, BrP13 and BrP14.

BrP4 and BrP7 are not suitable for allocation.

## **6. Spatial Vision and Settlement Strategy**

The only settlement strategy that the Council is pursuing is to minimise any new housing in the four large villages and, in particular, Brookmans Park.

There is no logical foundation for the Council to find a new village (SDS6), in the middle of nowhere, more suitable and more sustainable than expanding the existing large villages. The Council has lost all sense of reason and objectivity, to the point where its Submission Local Plan has lost credibility.

**Action:** The Council should allocate BrP1, BrP6, BrP9, BrP10, BrP12, BrP13 and BrP14.

BrP4 and BrP7 are not suitable for allocation.

## **7. Targets for Growth**

The Council has sought to minimise housing in the borough. This is not compliant with paragraphs 14 and 47 of the NPPF and runs counter to the principles of sustainable development.

The Submission Local plan fails all of the tests in paragraph 182 of the NPPF. By any measure, it is not positive, it is not justified or effective and it is not compliant with national policy.

**Action:** The Council should allocate all suitable sites in sustainable locations to positively boost the supply of housing and to meet its OAN in full.

## **8. Five Year Land Supply**

The Council does not have a five year land supply.

The Council has numerous sites which could contribute towards the five year land supply, particularly in and around the four large villages, which it is refusing to allocate without reason or explanation.

**Action:** The Council should allocate all suitable sites in sustainable locations to positively deliver new homes in accordance with paragraphs 14 and 47 of the NPPF.

## **9. Overall Development Strategy**

The Council's development strategy has been to delay and obstruct the progress of its Local Plan. The Council has no intention of meeting its OAN. The Council has failed to objectively assess or allocate sustainable sites which are in or around the four large villages.

The Welwyn Hatfield Borough is blessed with a very strong and vibrant location to the north of London, with excellent transport links throughout the borough. There is strong and sustained employment.

The East Coast Mainline runs from Kings Cross to the north of England and Scotland, with excellent public transport connections at Brookmans Park, Welham Green, Hatfield and Welwyn Garden City. Kings Cross also provides direct rail links to Europe.

The A1M runs through the borough adjacent to Brookmans Park, Welham Green, Hatfield, Welwyn and Welwyn Garden City.

The M25 runs to the south of Brookmans Park, with Junctions 22, 23 and 24 all providing direct and excellent access to the strategic national road network.

The borough is within close proximity to London Heathrow, Stansted and Luton airports.

The economic strength and security within the borough is the envy of most other local authorities throughout the United Kingdom.

Despite all of these highly sustainable attributes, the Council is pursuing a development strategy which seeks to limit housing provision. This strategy will cause house prices to rise further, making access to housing more difficult and will limit economic growth. The Council's strategy will cause particular harm to the younger people in the borough. This is not a sustainable strategy.

**Action:** The Council must adopt a strategy which provides homes for all sectors of its community and to support the growth of the borough socially, economically and environmentally. There is no reason why the Council cannot meet its full OAN and it should be made to do so through this Examination.

Neil Bedford

9 October 2016