

STAGE 8 HEARING SESSION – Neil Bedford

Response to Inspector's Matters, Issues and Questions

BrP4

1. BrP4/HS22 should not be allocated for housing development and its proposed allocation by the Council makes the Local Plan unsound:
 - the wrong side of the railway (permanent boundary),
 - on "*essential to retain Green Belt*" (by any rational judgment),
 - in a fragile gap between first tier and second tier settlements,
 - physically outside of any settlement,
 - open countryside and attractive landscape,
 - socially divisive,
 - massive negative impact on Water End and its community,
 - adjacent to an SSSI,
 - causing coalescence with Welham Green and Water End,
 - harmful to settlement pattern,
 - high sensitivity and low capacity to landscape and,
 - environmentally sensitive.
2. There was never any positive evidence to support the allocation of BrP4. It was allocated for political reason, because it is not in Brookmans Park. The same situation applies equally to BrP7, which is in Little Heath.
3. The Local Plan was not sound when it was submitted because it did not meet the housing need in the borough, it did not meet its five-year land supply and its housing distribution strategy was based on political rather than planning objectives.
4. The Council was fully aware that it the plan was not sound when it was submitted in May 2017, three years ago. Since that time, the Council has obstructed the progress of the examination and continues to refuse to meet its housing need, its five-year land supply or to promote sustainable development through objective housing distribution.
5. The Council has now decided to delete BrP4 from its Local Plan allocation. Whilst that is the correct thing to do, because that allocation is not sound, there are now no large housing site allocations in Brookmans Park.
6. Brookmans Park is a suitable and sustainable large village, built in the period between 1930 and 1980. It was specifically created, on the mainline railway, as a new village for the purpose to provide homes in the Borough.
7. There are four large sites in Brookmans Park and one in Bell Bar which are all suitable, available, deliverable and sustainable for housing, to deliver approximately 700 - 800 new homes all within walking distance of the railway station, the bus stops, the shops, the schools and all other local facilities:

BrP1 (Bell Bar)

BrP6 (Brookmans Park)

BrP9 (Brookmans Park)

BRP10 (Brookmans Park)

BRP12 (Brookmans Park)

8. The failure of the Council to give first consideration to housing sites which are within walking distance of excellent public transport facilities and other local services is in direct conflict with paragraph 138 of the NPPF and is not a sustainable strategy. The Council could, at the stroke of a pen, comply with paragraph 138 but it will not do so for political reasons. This makes the submitted plan manifestly not sound and these matters require an examination hearing.
9. The Inspector has said he will not even consider omitted sites, regardless of their suitability or sustainability. As a consequence, the Local Plan does not meet its housing need, is not justified, as required by paragraph 182 of the NPPF, and is therefore not sound.
10. The fact that the plan is not justified, due to politically motivated obstruction of suitable and sustainable site selection, requires an examination hearing including an honest and objective consideration of omitted sites. The Council must be held accountable for its prejudicial site allocations.
11. Brookmans Park is being assessed inconsistently to other areas of the Borough, for political reasons. This applies not just to the Green Belt but also to other material planning considerations which are being applied unfairly or inconsistently in Brookmans Park. Political interference in site allocations (BrP4 being a prime example) makes the Local Plan unsound.
12. Councillors are elected to represent the best interests of the whole community, not just their own ward or their favoured few. When BrP4 is deleted from the plan, Brookmans Park will have only two small site allocations for a total of 24 dwellings.
13. Paragraph 14 of the NPPF requires a Council to meet its housing need and its five year supply unless adverse impacts would significantly and demonstrably outweigh the benefits. The Council has failed to identify any significant or demonstrable impacts that would justify not meeting its housing need.
14. The Green Belt in the Welwyn Hatfield Borough is no more special than any other Green Belt around London, or any other town or city. If the Inspector allows Welwyn Hatfield to justify not meeting its housing need in order to protect excluded settlements from any new housing, regardless of suitability or sustainability, that would be inconsistent with other Local Plans where Councils have met their housing need, including the release of Green Belt land in the most suitable and sustainable locations. Serious inconsistencies between examination outcomes would not be sound.
15. The Local Plan could be made sound by the Inspector simply examining the omitted sites in the Borough which the Council's own planning officers have found in most cases to be suitable, available, deliverable, sustainable and reasonable alternatives.