

## **Welwyn Hatfield Borough Council – Submission Local Plan**

### **Birchall Garden Suburb – Hearing on 30<sup>th</sup> January 2018**

#### **Matter 1 - Green Belt**

1. The development of Birchall Garden Suburb will cause more harm to the Green Belt than many of the other sites in the borough, which the Council has not allocated.
2. The proposed Green Belt boundaries are weak.
3. The site is in open and exposed countryside.
4. The site causes encroachment between two first tier towns.
5. There is no logic to the Council's allocation of SDS2, SDS5 and SDS6. The allocation of all or any of these sites will cause significant harm to the Green Belt.
6. The Council should allocate suitable and sustainable sites in the borough ahead of Birchall Garden Suburb, in accordance with the principles of the Calverton judgment.

#### **Matter 2 - Green Corridor**

1. Birchall Garden Suburb would obstruct the proposed Green Corridor.
2. There is no logic to stating in the Local Plan that an existing area of open countryside will become a Green Corridor and then building an extension to Welwyn Garden City in the middle of that corridor.

#### **Matter 3 – Ecology**

No comment.

#### **Matter 4 – Minerals**

1. Why has the Council allocated three sites (SDS2, SDS5 and SDS6) for approximately 4,000 new homes in an area of sand and gravel reserves? It is highly improbable that the minerals could be extracted, the land filled and houses built on that land within the Plan Period. As such, the only option is to sterilise the mineral resources.
2. The Green Belt studies and the Sustainability Appraisal should have identified the more suitable sites within the borough, instead of SDS2, SDS5 and SDS6.

#### **Matter 5 – Environmental Considerations**

1. There is a large landfill site adjoining the proposed residential areas on SDS2. The Council has not produced any information or given any explanation to the public about content of the landfill or the potential harm to health from this hazard. Until that information is made available and properly assessed by experts, SDS2 should not be allocated.
2. There are serious concerns to public health in respect of ground water contamination and gas emission pollution.
3. It is not appropriate for the Council to fail to require (or if it is available, to withhold) vital information from the public until the Examination in Public has reached this stage in its process.
4. There are other far more suitable sites in the borough, which have not been allocated, which do not pose a hazard to public health and wellbeing.

### **Matter 6 – Noise and Air Quality**

1. The site will be exposed to noise and pollution from the very busy A414, which has a very significant number of HGV movements.
2. The site will suffer from noise and pollution from the existing waste processing and reclamation activity at Burnside.

### **Matter 7 – Historic Heritage**

1. It is inconceivable that the development of SDS2 would not have a detrimental impact on Hatfield House and its setting.

### **Matter 8 – Retail**

No comment

### **Matter 9 – Gypsy and Travellers**

No comment

### **Matter 10 – Waste**

1. SDS2 is adjacent to a contaminated landfill site.
2. There is no evidence to explain the content of landfill site or its likely consequences to public health. As a result, there is no evidence to show how or when this site might be realistically delivered, or whether it can be delivered. This does not comply with the requirements of the NPPF.
3. Until such time as the Council makes the necessary information available to the public, together with independent expert analysis, the Examination of SDS2 should stop. SDS2 should not be allocated.

4. The Council must accept full liability for any consequences to public health if SDS2 is allocated and developed. It is not acceptable for the Council to allocate a site with a known potential to cause harm to public health and to then shift the responsibility onto others for that harm.

### **Matter 11 – Implementation**

1. The Council is seeking to allocate three strategic sights, SDS2, SDS5 and SDS6, none of which is suitable or deliverable within the Plan Period for reasons of contamination, mineral reserves or physical infrastructure. These sites are also unsuitable because of harm to the Green Belt.
2. Welwyn Hatfield Borough Council has a long history of delay and obstruction in the preparation and submission of its Local Plan. The previous Local Plan expired in 2011. The Council's submission Local Plan has a housing trajectory which pushes housing delivery towards the back of the Plan Period.
3. All of the evidence suggests that the Council has no intention of meeting its objectively assessed housing need or to allocate sites that would actually deliver new homes in the borough within the Plan Period.
4. It appears that the Council is allocating sites which it knows, or should know, will not be delivered in the Plan Period. Perhaps that is the Council's intention?
5. SDS2 should not be allocated. There are more suitable and sustainable sites in the borough, which have not been allocated.

**Alex Brooker MRICS**