

Joint Examination of the Welwyn Hatfield Local Plan 2013-32 (WHLP) and the East Herts District Plan 2011-33 (EHDP)

Birchall Garden Suburb (BGS)/East of Welwyn Garden City (EWEL1)

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On behalf of the Central Hertfordshire Green Corridor Group:

Matter 1: Green Belt

It accompanies our statements on the following other matters

Matter 2: Green Corridor

Matter 3: Ecology

Matter 5: Other Environmental Considerations

Matter 6: Sustainable location and movement

Matter 10: Waste

Matter 11: Implementation

Matter 1 – Green Belt

Issues

- 1) In that context, is the extent of the allocation justified, effective and consistent with national planning policy and do exceptional circumstances exist to release every part of the allocation from the Green Belt?
- 2) How and why was the allocated site chosen ahead of other potential options?

No. The Inspector's useful examination of the Green Belt in question 4 of Matter 2 regarding the WHBC Local Plan revealed that there is significant inconsistency in WHBC's assessment of their proposed housing allocation from the Green Belt. In particular, for example, the initial Map 2 of Appendix A of WHBC's hearing statement for this matter 2 in 'Q4: Green Belt review' correctly depicts a wide swathe of the Green Corridor as being of medium contribution to Green Belt purposes (with scores of 7 –9). But their subsequent housing site selection in Map 4 shows that a significant part of this Green Corridor would then be blocked by the proposed allocation for the Birchall Garden suburb (BGS or EWEL1) development for which the Green Belt is now shown to be low contribution with scores of 0-3. WHBC failed to provide any supporting evidence for this change of scores and proposed housing allocation - neither in their submissions nor in their representations and answers to questions at the Inspector's examination.

EHDC's current Local Plan similarly fails to provide convincing transparent evidence of any "very special circumstances" that clearly outweigh the losses from this proposed development in the green belt. Land to be removed from Green Belt in East Herts for the proposed BGS development are deemed, in their own PBA study, as strongly serving the purposes and function of Green Belt. EHDC then only make the general statement that "In East Herts there is a combination of factors that exist locally that together constitute exceptional circumstances that require the Council to amend its Green Belt boundaries". EHDC fails to provide sufficient grounds for this bald statement.