



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

Birchall Garden Suburb/East of Welwyn Garden City

RESPONSE TO THE INSPECTORS' MATTERS AND ISSUES ON BEHALF OF TARMAC TRADING LTD. (THE SITE PROMOTER)

Matter 1 - Green Belt

The National Planning Policy Framework stresses that the government attaches great importance to Green Belts and that their fundamental aim is to prevent urban sprawl by keeping land permanently open. Additionally, it also says that Green Belt boundaries should only be altered in exceptional circumstances.

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?

Yes. The assessments undertaken by the councils and by Tarmac demonstrate the exceptional circumstances required for this Green Belt release, taking particular account of the need to accommodate the area's very substantial housing needs in a sustainable manner (NPPF para. 84).

2) How and why was the allocated site chosen ahead of other potential options? How did the Councils work together when selecting the site in terms of alterations to the Green Belt?

We leave the councils to respond to this issue.

3) Is the proposed new boundary to urban development as robust, in the context of visually preventing urban sprawl and maintaining openness, as the current one?

It is robust and will become more robust.

As required by NPPF paragraph 85 (final bullet), the outer margins of the enlarged Welwyn Garden City would be clearly defined on the ground by a strong landscape boundary - the A414. This would become the outermost margin of a retained landscape buffer to urban development, and would form an essential component of wider green infrastructure incorporating woodland, a screening landform and SuDS features. Elsewhere, the boundary would be marked by a generous mix of undeveloped agricultural land, existing and proposed woodland adjoining the A414, and Panshanger Lane.



4) The southern part of Welwyn Garden City is largely hidden from the view of travellers along the A414 by topography and woodland. The journey from Hertford to Hatfield is one through pleasant open countryside where the Green Belt aims of visually preventing urban sprawl by keeping some land permanently open is clearly demonstrated, despite the proximity of urban development. The proposal involves development adjacent to or in close proximity to the A414 for much of the distance to the west of the B195.

5) How will this maintain the absence of a sense of visual urban sprawl outwards from Welwyn Garden City and impacting upon the experience of travellers along the A414?

The BGS Parameter Plan incorporates a wide landscaped buffer between the southernmost area of proposed built development and the A414. The buffer includes a screening landform, a woodland belt, other planted areas, SuDS drainage features and a footpath link, forming an integral part of the BGS green infrastructure network. One of the aims of this buffer is to maintain the sense of passing through countryside by virtue of hiding the development from view. Examples of such measures exist along part of this route and serve as a useful guide to the measures proposed for BGS. While relatively small in scale compared to the buffer proposed for BGS, they do provide an impression of passing through countryside by virtue of screening adjoining development (see **Appendix 1**).

Matter 2 – Green Corridor

Paragraph 114 of the NPPF requires Local Plans to take a strategic approach for the creation, protection, enhancement and management of green infrastructure. The establishment of a Green Corridor is promoted running between Welwyn Garden City and Hatfield but with onward linkages into East Hertfordshire to the east. It is intended to connect existing green infrastructure and ecological assets by movement routes and at the same time maintain a sense of space/separation between urban developments, consistent with a Green Belt Function.

Issues

6) How is this concept of green links to be achieved within Birchall Garden Suburb?

A Green Infrastructure Strategy for Birchall Garden Suburb (BGS) was submitted to WHBC and EHDC within Tarmac's Publication stage representations during 2016. The Strategy is informed by a wide range of intensive environmental surveys and builds on the aims of the Hertfordshire Strategic Green Infrastructure Plan (2011). It has formed a fundamental part of the iterative masterplan design process.

7) Would the notional route shown on Figure 8 of the WHLP and figure 13.2 of the EHDP be likely to achieve the Green Corridor Policy objectives at Birchall Garden Suburb? If not, why not?

This notional route, if applied literally, would achieve the Green Corridor policy objectives *in part* only. It is not informed by detailed survey or assessment and should be regarded as purely diagrammatic. The route shown is restricted in its ability to provide diverse wildlife habitat connectivity. For example, the core of the route crosses over open grassland on the slopes of the former landfill. This is wholly unsuitable for wetland species.

The preferred approach for BGS is one of finer-grained *permeability*, where the complex mix of topography, ground conditions and existing green assets within and external to the site are reflected in multiple green links throughout the site and which would support a wide range of interconnected wildlife habitats and routes for people. These multiple links are evident on the draft Parameter Plan (**Appendix 2**) and the draft Illustrative Master Plan (**Appendix 3**), which will be part of Tarmac's forthcoming outline planning application for BGS.



8) Is the proposal in accordance with the overarching objective of providing a meaningful and coherent Green Corridor?

The BGS proposal has been formulated in full accordance with this overarching objective, sharing the principles as described in the written policy. The delivery strategy adopted for BGS differs from the spatial representation adopted by the councils, but is based on robust evidence and will deliver a net biodiversity gain.

Matter 3 – Ecology

Birchall Garden Suburb contains a number of international and local wildlife sites as well as areas of ancient woodland, some of which contain protected species. The NPPF at paragraph 117 requires that planning for biodiversity should be undertaken at a landscape-scale and across local authority boundaries. It also says that the planning system should minimize impacts on biodiversity and provide net gains in biodiversity where possible.

Issues

9) Has an overall holistic survey of the wildlife importance of this area that looked at the interrelationship between the various sites been undertaken, together with risk assessments?

A range of ecological studies have been undertaken to obtain a thorough understanding of the ecological baseline of the area. The reports of these studies have been submitted to the Examinations (EX36 and ED170). These studies provided a basis from which potential impacts upon higher value sites within and outside BGS have been assessed. Where potential inter-relationships and links occur, these have also been considered.

10) If so, has this led to a strategy to minimize the impacts on and achieve net gains to biodiversity within the area during and following the development?

The baseline studies have provided essential information to inform the BGS masterplan, ensuring development minimises ecological impacts upon key areas of habitat and populations of important species. Retained habitats would be managed and enhanced; and significant areas of new habitat creation would ensure net biodiversity gains are achieved. Tarmac is working with the Wildlife Trust to deliver this outcome.

11) In the context of the area's wildlife, is the Sustainability Appraisal sufficiently robust to act as a justifiable basis for an overall assessment of this development proposal?

12) Has a joint Sustainability Appraisal been undertaken to ensure that the overall cumulative impacts of this proposal, within the two local authority areas, have been fully assessed and considered?

We leave the councils to respond to these two issues.

13) Is there a cross boundary biodiversity plan at a landscape-scale that looks at the cumulative impact of the whole development?

Ecologists have played a significant part in formulating the landscape strategy to ensure appropriate and achievable biodiversity gains are proposed. This covers the whole site and has been designed to work at a wider cross-boundary level, ensuring a consistent approach to biodiversity enhancement across BGS.



14) What mitigation measures are proposed to maintain the functioning of the area's ecological assets? And what confidence can be placed on their robustness and adequacy to minimize any impacts on biodiversity and provide net gains in biodiversity where possible?

Much of the site comprises arable and grassland of low ecological value, although there are ecological assets that include both habitats and species. The BGS development has been designed to retain and protect key areas and to introduce positive management to improve their future value and functioning. Given the species and habitats present and the measures proposed to mitigate impacts, it is considered that the development would deliver a biodiversity benefit overall (EX36 and ED170).

15) Has sufficient attention been paid to the protection and enhancement of wildlife sites and their inter-linkages?

All designated wildlife sites and ancient woodlands are proposed to be retained and the landscape strategy has been designed to ensure key linkages and routes for wildlife between them are maintained and in some instances enhanced and strengthened. Proposed links include a 50m wide wildlife corridor connecting BGS green infrastructure to The Commons Local Nature Reserve.

16) Will the priority habitats of species of national and international importance found in the area be preserved, restored and/or recreated when this development is implemented?

17) If so how will this be achieved?

The BGS development would not affect any sites that have been designated as being of national or international importance. National priority habitats include important hedgerows, some woodland habitat and ponds. The masterplan ensures impacts upon these features would be avoided or minimised (e.g. by incorporating 15m buffers around woodland, in accordance with Natural England advice), while the landscape strategy provides for enhancement of retained habitats and creation of new ones. Though some species may be listed as national priorities or are protected under UK and European statute, they are not necessarily rare or endangered. Nevertheless, potential impacts upon such species have been assessed and mitigation measures proposed to ensure impacts are minimised.

18) Are the requirements of Section 40(1) of the Natural Environment and Local Communities Act 2006 likely to be met through this development if it is implemented as proposed?

It is considered that these requirements would be met by the BGS development as proposed.



Matter 4 – Minerals

In Section 13 the NPPF seeks to facilitate the sustainable use of minerals. Minerals Safeguarding Areas are to be defined and appropriate policies adopted in order that known locations of specific mineral resources are not needlessly sterilized by non-mineral development. There are known mineral resources under this site.

Issues

19) To what extent are measures in place to ensure that minerals of local and national importance that underlay this site, are extracted before they become sterilised?

The sand and gravel deposits underlying the site form part of Hertfordshire's extensive southern sand and gravel belt. Their extraction has been carefully investigated and the volume and extent proposed – c.162,000 tonnes to the north of the Hertingfordbury 023 public footpath, west of Birchall Wood – takes account of the geology of the site and has been agreed with HCC's Minerals and Waste Policy Manager (see **Appendix 4**). This extraction would be readily accessed via the B195 and processed at a local facility.

20) Could such considerations delay the implementation of development at this site?

This agreed level of mineral extraction would take approximately 6 months and could be undertaken in parallel with the delivery of infrastructure to enable the development. Implementation of BGS therefore would not be delayed.

Matter 5 – Other Environmental Considerations

At paragraph 100 the NPPF says that Local Plans should be supported by a Strategic Flood Risk Assessment. At paragraph 109 it also points out that the planning system should prevent new and existing developments from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. At paragraph 123 it further points out that planning policies should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development?

Water

21) Is the development of this site supported by a positive Strategic Flood Risk Assessment?

We leave the councils to respond to this issue.

22) Will the removal of minerals from the site and the consequent lowering of ground levels have any implications for flooding?

The proposed restored ground levels post-extraction would enable the surface water from this area to be drained via gravity to the existing outfall location. Ground levels have been considered within the drainage strategy to ensure flood risks are suitably managed.

23) Have the ramifications of this proposed development for flooding at locations downstream been examined? If so are all of the issues raised likely to be capable of remediation such that flood risk will not be increased elsewhere?

As part of the drainage strategy, it is proposed to discharge flows off site below the existing rate and volume. As such, the proposed development would reduce any existing downstream flooding.



24) Has the ability of this site to be drained through a Sustainable Urban Drainage Scheme been fully assessed?

Yes, a Sustainable Urban Drainage System (SuDS) is key to the BGS masterplan, consisting of a network of swales, ponds and ditches to attenuate surface water flows and improve their quality prior to discharge off site at a rate and volume below the existing. Opportunities to drain surface water directly to the ground via infiltration shall be explored where possible.

The river Mimram and the upper Lea are chalk streams of importance as a result of their special ecology

25) Has there been any research into the likely leaching of contaminants from the historically tipped areas into ground water and the local water courses?

In addition to more than 30 years of monitoring by Tarmac and its predecessors, intrusive ground investigations have been carried out across the BGS site (see our response to Issue 45). Soil and groundwater samples have been recovered from across the site; and surface water samples have been recovered from the eastern arm of the Hatfield Hyde Brook, as well as some of the on-site drains/streams.

26) If so what are the results? Can a permanently safe environment for the human population and local wildlife be guaranteed?

The assessments confirmed the presence of some contaminants within the groundwater and surface water. Given the proposed sensitive end use, mitigation proposals will include the installation of an interceptor drain along the boundary of the historically tipped area to intercept leachate, which would be discharged off site to a public sewer under an existing consent. This would result in improvements to existing environmental conditions and provide a safe environment.

27) Can this development be implemented without major upgrades to the trunk sewage network and/or the sewage treatment facilities?

Tarmac commissioned Thames Water to undertake a sewer impact assessment for BGS (see **Appendix 5**). This confirms the availability of deliverable local improvement options, which would ensure adequate capacity is available to serve BGS without needing to rely on capacity upgrades at the Rye Meads Wastewater Treatment Works.

28) If not, what infrastructure improvements are proposed and when are they programmed for implementation?

The sewer impact assessment (Appendix 5) identifies two options to overcome any network capacity constraints local to and deliverable by BGS: installation of on-site storage; and upgrading of a nearby foul pumping station. As BGS progresses through the Planning process, any such local improvements shall be defined in detail, in liaison with Thames Water.



Noise and Air Quality

29) Has there been an assessment of noise and atmospheric pollution levels along the northern side of the A414?

Noise measurements were recorded over multiple days in 2014 and 2015 at three locations adjacent to the A414. A further measurement was undertaken in 2017 to provide a comparative later reading¹.

Air quality measurements were calculated at six proposed residential receptor locations along the northern side of the A414, including adjacent to Holwell Lane roundabout, the proposed gypsy and traveller site, and Birchall Lane roundabout². The proposed receptors were modelled at a height of 1.5m to represent ground floor exposure.

30) If so do these demonstrate that an acceptable residential environment can be achieved in the vicinity of the road without the need to resort to mitigation?

Baseline noise measurements taken at the four sites adjacent to the A414 indicate that some standard mitigation will be required. BS 8233 and WHO standards can be achieved through layout design, as well as through specific measures such as double glazing.

Predicted concentrations of nitrogen dioxide (NO₂) and airborne particulates (PM₁₀ and PM_{2.5}) at proposed residential receptor locations were measured to be well below the relevant air quality objectives and therefore no additional on-site mitigation is likely to be required.

The proposed landscaped bund adjacent to the A414 would improve both the noise environment and air quality further.

Matter 6 – Sustainable location and movement

Issues

31) What is the rationale for the dispersed siting of residential development where some areas are remote from the urban area of Welwyn Garden City? Is this the most sustainable option in terms of access to services and facilities within the City?

The configuration of BGS reflects its conception as a garden suburb, incorporating extensive open space affording excellent connectivity on foot and by cycle. In this respect, the large extent and central location of the former landfill are as much an opportunity for sustainable development as a constraint to the layout of BGS.

For the Welwyn Hatfield part of BGS, the proposed internal route through the site from the A414 to Cole Green Lane would provide good access to services and facilities in Welwyn Garden City by a range of travel modes, while the B195 allows good such access for the East Herts element. In addition, both parts of BGS would incorporate neighbourhood centres and schools.

¹ Undertaken by Cole Jarman on behalf of Tarmac

² Undertaken by Peter Brett Associates on behalf of Tarmac



32) What specific proposals are there to provide improved and segregated movement facilities to connect the distinct parts of this development and to link them to jobs, facilities and strategic transportation in Welwyn Garden City and Hatfield?

A draft Transport Assessment and Travel Plan for BGS were reviewed by Hertfordshire County Council (HCC) in August 2017. HCC confirms it has “no objection to the proposed development in principle” (see **Appendix 6**). A Statement of Common Ground with HCC on transport matters forms **Appendix 7**. This details the specific movement proposals associated with BGS, which include making full use of the segregated Cole Green Way (Route 61 of the National Cycle Network) and facilitating the delivery of a non-motorised link to Hatfield.

Matter 7 – Historic Heritage and Urban Design

There are a number of historic heritage assets within or close to the site, some of which are of national significance. In preparing Local Plans the NPPF requires Local Planning Authorities to recognize that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. The Planning (Listed Buildings and Conservation Areas) Act 1990 also requires them to have special regard to the desirability of preserving the setting of listed buildings.

Heritage Assets

33) Is there an evidence base that has assessed the sensitivity of development to the nearby Heritage assets, including montages of the views affected (as recommended by the Heritage Impact Assessment produced for the Councils by Beacon Planning)?

The proposed BGS masterplan has been assessed in relation to heritage assets both in terms of cultural heritage and landscape and visual assessment. Photomontages have been prepared to address matters raised by Historic England (HE). These represented selected viewpoints agreed with HE following a joint field inspection also involving council representatives on 25th July 2017. The montages demonstrate that any concerns regarding the potential impact of proposed development can be mitigated. The montages were submitted to HE on 5th October 2017 and were subsequently submitted to the Examinations (EX37 and ED171).

34) If so, has the allocation had full regard to this evidence?

Yes. The allocation has been adjusted in line with the proposed BGS Parameter Plan (Appendix 2), which in turn reflects the mitigation measures represented in the submitted photomontages (EX37 and ED171).

35) Would development in the south-eastern part of the site, in proximity to the A414, be visible from Hatfield House and its Historic Park and from the Essendon heritage assets? Would development in the north western and eastern part of the site be visible from Panshanger Park?

There are no formal views from Hatfield House or garden towards the BGS site. Under the maximum parameter development heights (12m), the uppermost levels of parts of proposed development in this location may be partly visible above intervening woodland from the roof of Hatfield House, but not from lower elevations of the house. At a distance of approximately 3.2km and in the context of development being set at a relatively low level in the landscape, the effect would not be significant. Under proposed mitigation, the development would be screened. A visibility cross-section examined the scale of potential effect and forms **Appendix 8**.

Parts of the BGS site would be visible from the Essendon heritage assets. Views from this location formed part of the joint field inspection with HE.

The BGS site is screened from views within Panshanger Park by intervening landform and woodland. This aspect was examined in detail during the joint field inspection.



36) If so, would the development be harmful to the settings of the heritage assets?

Taking account of its limited visibility from these heritage assets and other relevant considerations, the development would not be unacceptably harmful to the settings or significance of these assets. Any harm would be less than substantial in the terms of the NPPF (para. 134).

37) To what extent could the proposals harm the setting of Holwell Court and Holwellhyde Farmhouse? Has the impact of development on their setting been given adequate consideration in the formulation of the notional layout?

Again, any harm would be less than substantial.

Holwell Court is separated from the development by the A414 and the development would not be visible from it.

The setting of Holwellhyde Farmhouse combines urban and urban fringe elements. The BGS masterplan allows for the preservation of the setting, including a small triangular field to the east and part of an adjoining field to the west. Development would occur nearby and inevitably increase the urban element, but not entirely replace the urban fringe elements to the east and west.

Garden City Principles

The original Garden City was founded on a set of principles that sought to establish a settlement that minimized its impact on the surrounding Countryside. A southern boundary known as the “Salisbury Line” was established beyond which it was not considered appropriate for the town to extend in a southerly direction.

38) Does the proposed new edge to Welwyn Garden City maintain the principles of urban containment upon which the Garden City was founded to the same extent as the original boundary?

As demonstrated in response to Issue 3, the edge of Welwyn Garden City following the development of BGS would maintain its founding principles of urban containment to the same extent as the town's original boundary. The “Salisbury Line” serves no purpose in relation to BGS. A legal opinion from James Maurici QC on its status is presented at **Appendix 9**.

39) Some of the residential areas appear isolated and remote from the urban area of Welwyn Garden City? How does this fit in with Garden City Principles?

The BGS masterplan is entirely consistent with Garden City Principles, as demonstrated in response to Issue 31.

Matter 8 – Retail

Development is proposed to occur on either side of a reclaimed waste tip area, creating two distinct neighbourhoods of similar size.

Issues

40) In that context, why is one of the two centres proposed to be subservient to the other?

We leave the councils to respond to this issue.



41) Has there been any assessment of the likely comparative need for retail and community facilities, within the two neighbourhoods and the respective areas that they abut?

The provision of 2,550 homes will generate a potential population of nearly 6,200 residents³. This will produce a projected total convenience retail spend of around £12.9 million on-site by 2032⁴, enough to support local retail provision of 1250 - 2150sqm (GEA), dependent upon the degree of retention of expenditure on-site⁵.

42) Does an evidence base justify the differing proposals for the two neighbourhood centre proposals?

We leave the councils to respond to this issue.

Matter 9 – Gypsies and Travellers

Issues

43) Is there a robustly proven need for the overall number of Gypsy and Traveller pitches proposed in this locality?

44) Has there been adequate consultation to establish the assumed need for Gypsy and Traveller pitches in this locality?

We leave the councils to respond to these issues.

Matter 10 – Waste

An extensive area within the central part of this site has been historically filled with household refuse. There are also existing waste operators with functioning premises in the area.

Issues

45) To what extent has the extent and content of the waste tips within the site been surveyed and analysed?

The extent and content of filled areas within the site have been surveyed and analysed over many years. Intrusive investigations of those areas were undertaken in 1981, 2014, 2015 and 2017. In addition, intrusive investigations have been undertaken to the south and west of those filled areas, involving 198 boreholes and trial pits, and 53 trial trenches. Further details are presented in Examination documents EX35 and ED169.

Furthermore, monitoring of surface water, groundwater and ground gas is ongoing as part of Tarmac's aftercare strategy.

³ Based on average household sizes in Welwyn Hatfield Borough and East Hertfordshire District as set out in Household Projections, Office for National Statistics (2013)

⁴ Based on average projected (2032) convenience spend per capita in Welwyn Garden City, Hatfield and Hertford as set out in Welwyn Hatfield Retail and Town Centre Needs Assessment Update (2016)

⁵ Based on retention level and sales density (£ per sqm) figures as set out in Welwyn Hatfield Retail and Town Centre Needs Assessment Update (2016)



46) Has research been able to demonstrate the full extent and nature of any contaminants in this area, their risk to human health and the necessary remediation measures required to make these areas safe for use by the general public?

Soil/groundwater samples have been recovered from several of the investigations for laboratory analysis of 155 potential contaminants to facilitate assessment of the potential risk to human health and controlled waters. These investigations and assessments have provided a good indication of ground conditions and have not identified any significant constraints to BGS. These studies have been used to develop an Outline Remediation Strategy (**Appendix 10**).

47) How long are the methane vents expected to remain?

The site characterisation work undertaken to date indicates the risk from ground gas is low, although monitoring is ongoing and further assessment will be undertaken as the Planning process advances. The methane vents will remain until ongoing monitoring/assessments indicate they can be decommissioned.

48) Is there a short term remedy to the outflow of methane from some/all of the tipped areas?

Yes, to mitigate the potential risk to residential properties, which would be located outside the filled areas, foundations would incorporate gas protection membranes.

49) Is the site capable of being considered as non-contaminated land under Part IIA of the Environmental Protection Act 1990 in the short term?

We leave the councils to respond to this issue.

50) If not, what further remediation measures are likely to be necessary and when will they be fully implemented?

Given the proposed sensitive end use, mitigation measures will be implemented prior to the occupation of the development and will comprise the installation of an interceptor drain and the construction of a localised reed bed treatment system, as detailed in Appendix 10.

51) Are the existing waste management facilities expected to remain for the duration of the plan period?

We leave the councils to respond to this issue.

52) If so, have the ramifications of their continued operation for the living conditions at proposed nearby dwellings been fully considered and does the notional layout meet the requirements of NPPF paragraph 123 in the context of the operations of the existing users as well as any future residents?

Noise measurements have been recorded at four locations adjacent to each of Burnside (on the A414) and Highlands (on Birchall Lane) in 2014, 2015 and 2017.

Average daytime noise levels surrounding Burnside were recorded at 57dB L_{Aeq}, marginally above the BS 8233 / WHO guideline figure (55dB). The proposed 60m buffer here would reduce noise at nearby parts of the proposed development to acceptable levels.

Average daytime noise levels surrounding Highlands range from 54 to 64dB L_{Aeq}, with a reduction in the highest levels of noise measurements in 2017 following the introduction of bunding. The closest residential provision to the north of the Highlands site would be approximately 90m from the main processing plant, while woodland 250m deep provides attenuation for proposed housing to the east. Noise from Highlands therefore is not a material consideration at these locations.



53) Have the requirements of NPPF paragraphs 120-121 been taken fully into account in the planning of this garden suburb?

Yes, in addition to the previous investigations/assessments cited in response to Issue 45, assessment work is ongoing as the Planning process advances.

Matter 11 - Implementation

A large part of the site is covered with historic landfill whose remediation does not appear to be complete. Parts of the site are underlain with strategically important minerals that should be extracted before development commences above them.

Issues

54) Is the site realistically likely to deliver over 2,500 dwellings within the plan period?

There are no significant impediments to the delivery of 2,550 dwellings over the Plan periods. Landfill remediation and prior mineral extraction will not materially delay the BGS development. The infrastructure capacity assessments undertaken on behalf of Tarmac have demonstrated that all site wide infrastructure requirements set out in the IDPs of both councils can be delivered in accordance with appropriate thresholds and triggers.

Draft policies EWEL 1 and SP19 commit the councils to preparing a joint masterplan SPD, with the requirement that "any application for development should be preceded by, and consistent with, the Masterplan". Since 2013, Tarmac has carried out extensive and ongoing engagement with local stakeholders to inform the development of the masterplan for BGS, resulting in significant design enhancements. The consultation process has included hands-on workshops, exhibitions and stakeholder engagement. Tarmac is arranging further workshops with both councils and has committed to formulating a Design Code for BGS. As is standard for this type of development, the Design Code would be formulated as a condition of any Outline planning permission. This approach would minimise the risk of delay to the delivery of BGS, removing the need for a further time-consuming, pre-permission masterplanning process which would duplicate completed and ongoing work.

Against that background, the proposed SPD is entirely unnecessary and could put at risk the delivery of the full allocation within the Plan periods. We therefore consider the councils' SPD proposal should be scrutinised thoroughly during the hearing session.

55) What are the implications if one part of the allocation is found to be unsound?

We leave the councils to respond to this issue.