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By e-mail to r.javes@welhat.gov.uk

9 December 2019

Dear Mr Javes

LAF019/AW

**RE: WELWYN HATFIELD LOCAL PLAN – CONSULTATION ON
GENERAL LOCATION OF GREEN CORRIDOR**

We welcome this consultation and are pleased to respond on behalf of **Tarmac Trading Ltd.**, the promoter of the planned Birchall Garden Suburb (BGS) development.

As you requested in your invitation to respond to this consultation on 25th November, we present our response in bullet-point format, to assist your tabulation of the matters raised for the purposes of the Local Plan Examination Inspector.

Do we agree with the council's stated objectives for this part of the Green Corridor and, if not, why not?

- **Yes**, these objectives are well expressed within the consultation document, as follows:
 - "aid the movement of wildlife and people" (1.7)
 - "function as a buffer to sensitive assets which may be of cultural or natural heritage importance" (1.7)
 - "conserve and enhance ecological assets" (1.9)
 - "create a network of footpaths, cycleways and bridleways" (1.9)
 - "provide a community resource that will help maintain a sense of space" (1.9)
 - "help to conserve features of natural and cultural heritage importance" (1.10)
 - "help communities respond to the anticipated impacts of a changing climate" (1.10)
 - "secure overall net gains to biodiversity" (1.10)
 - "help mitigate potential impacts on land which is currently not heavily influenced by human involvement" (1.10)

- Fundamentally, however, it is only through the allocation of the whole of the BGS site in the Local Plan, as currently proposed by the Council, that the delivery of the Green Corridor can be assured:

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- a Green Corridor within the site does *not* exist at present (1.3: “much of the land within the BGS site is managed as arable agriculture”, with consequent low ecological/environmental value)
- The BGS site remains in private ownership, with no prospect of public acquisition (to deliver a Green Corridor) in the absence of allocation and development
- Critically, it is the large extent (c.90 hectares) of the former landfill area in the central part of the BGS site that is pivotal to the achievement of the Council’s stated objectives for this part of the Green Corridor, including to “provide a community resource that will help maintain a sense of space” (1.9) and “secure overall net gains to biodiversity” (1.10). However:
 - The former landfill area is *not* an “informal access space” (1.13)
 - Nor does that area currently offer *any* “permissive access” (1.13; Fig. 1 correctly showing no “permissive routes” into/within that area)
 - Yet that very large area could only become publicly accessible (beyond the single Public Right of Way currently traversing it) and be comprehensively managed for environmental gain in association with the allocation of the whole of the BGS site in the Local Plan

Do we feel that there are other, sufficiently distinct, options that the examination should consider?

- Yes. The Hertfordshire Strategic Green Infrastructure Plan (2011) and the contemporaneous more detailed green infrastructure plans for Welwyn Hatfield Borough and East Herts District strongly emphasised the roles of the existing green corridors afforded by the rivers Lee and Mimram to the south and north east of the BGS site respectively (see Figs. 2 and 3 of the BGS Green Infrastructure Strategy, appended to our Publication stage representations, but enclosed with this response for ease of reference).
- The Examination should consider how the distribution of green infrastructure across the BGS site could deliver robust and high quality linkages between green assets within the site and those key existing green corridors (Fig. 12 within our BGS Green Infrastructure Strategy illustrates how those linkages could be promoted).
- More generally, the Examination should consider the merits of the finer grain, multi-stranded approach to green connectivity based on existing and potential green assets within the site that we propose within our BGS Green Infrastructure Strategy (Fig. 12) relative to a single, wide Green Corridor across the site incorporating certain areas of limited existing or even potential value as green infrastructure.

- Furthermore, any Supplementary Planning Document (SPD) for the Green Corridor should be a framework building upon the objectives in the proposed Local Plan policy (SP12), against which any planning application should be judged. To that extent, identifying potential options for prospective green links across the BGS site may be appropriate, but it cannot be appropriate to identify a preferred option without the detailed evidence base that would come forward as part of any planning application. To do so at this stage must be premature; the design of green infrastructure across the site must be informed by detailed survey and assessment.

Which of the three options, if any, do we prefer and the reasons why?

- Of the three options put forward in the consultation document and with the strong caveats we have set out above, we prefer Option 1, for the reasons set out within the consultation document.
- Nonetheless, elements of Option 2 and Option 3 have merit and incorporate green assets of existing or potential value, as we have reflected in our BGS Green Infrastructure Strategy (Fig. 12).
- Furthermore, the statement that “a width of 100m would be desirable where the primary functionality of the green corridor is to improve connectivity with sites of nature conservation interest” (1.36) does not reflect the expert view of the Hertfordshire & Middlesex Wildlife Trust, which considers a width of 50m to be sufficient for that purpose.

Our concerns about the appropriateness of the other options

- Reliance on Option 2 as the main (or even the single) Green Corridor through the BGS site would be inappropriate, in failing to utilise the opportunity to connect The Commons Local Nature Reserve with the former landfill area.
- Reliance on Option 3 as the main (or even the single) Green Corridor through the site would also be inappropriate for the above reason and also through its use of land alongside the A414 (both south and north of Birchall Lane) and Panshanger Lane that is in the ownership of a party who is actively opposing and hindering the development of BGS. Option 3 is not deliverable, therefore.

If we are promoting an alternate option, why we feel that our option is to be preferred when assessed against the stated objectives for the Green Corridor

- The finer grain, multi-stranded approach to green connectivity that we are promoting (see our BGS Green Infrastructure Strategy) would perform more strongly than the single Green Corridor concept against the stated objectives for the Green Corridor (especially the biodiversity/ecological and access/recreational ones), by incorporating more green assets within the site of existing and potential value and by providing for more green connections both across the site itself and with the strategic green infrastructure corridors of the rivers Lee and Mimram.



Yours sincerely

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