

WELWYN HATFIELD LOCAL PLAN EXAMINATION

Response to EX223 (Treatment of Green Belt boundaries of allocations in the Welwyn Hatfield Local Plan; Dec 2020)

Tarmac Trading Ltd.

1. The Council has identified Birchall Garden Suburb (BGS) as an allocation where the re-aligned Green Belt boundary should be delineated by landscape features alongside the edge of the development area that are proposed to be strengthened.
2. That approach to Green Belt boundary definition is fundamentally inappropriate to BGS, whether the full allocation of 1,300 homes, a new primary school and a new neighbourhood centre is retained (as we continue to promote) or whether that allocation is reduced to 600 homes (as the Council currently proposes, in response to the Inspector's interim report).
3. At BGS, the A414 is the only appropriate boundary for the re-aligned Green Belt in either of those scenarios. As the 2012 NPPF (para. 85) requires, the A414 on the southern side of BGS is an existing, prominent "physical feature" that is "readily recognisable" and "permanent", such that it would be a suitably "clear" Green Belt boundary.
4. The Council's proposed re-alignment of the Green Belt boundary in association with a reduced BGS allocation is fundamentally inappropriate. That proposed re-alignment would result in an incongruous enclave of Green Belt land surrounded by urban land uses and contained by the A414, thereby serving none of the purposes of Green Belt policy (our response to EX227 presents further details). In addition, a substantial section of the Council's proposed re-alignment follows an administrative boundary between Welwyn Hatfield and East Herts through Howell Park Wood, which does not manifest itself in any "physical feature" that is "readily recognisable", as the 2012 NPPF (para. 85) requires for any Green Belt boundary.
5. These deficiencies of the Council's proposed Green Belt boundary derive from the Council's eschewing of the A414 as the appropriate boundary for the re-aligned Green Belt on this edge of Welwyn Garden City.
6. Even if the BGS allocation is reduced, as the Council currently proposes, the area to the north of the A414, east of Burnside and south of the former landfill area, should be designated as safeguarded land, in the context of the requirement in the 2012 NPPF that local planning authorities should "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" (para. 85).
7. Even if the full BGS allocation is not retained, the balance of that allocation remains eminently appropriate for development and therefore should be removed from the Green Belt. A boundary retaining that area within the Green Belt, as the Council currently proposes, therefore would be highly likely to need to be altered in a future Local Plan, contrary to the requirements for boundary definition in the 2012 NPPF (*ibid.*).
8. The use of the adjacent section of the A414 as the re-aligned Green Belt boundary around the part of BGS allocated in the *East Herts District Plan* (2018) underlines the appropriateness of using this major road as the re-aligned Green Belt boundary around the Welwyn Hatfield part of BGS, whether the full allocation is retained (as we continue to promote) or whether that allocation is reduced (as the Council currently proposes).

9. In this respect, it is essential that BGS is understood in the context in which it has always been conceived and planned – as a cross-boundary, south-easterly extension to Welwyn Garden City, contained by the A414 and comprising not only large scale development (some 2,650 homes and complementary urban land uses), but crucially an extensive parkland as the designed centrepiece of this comprehensively planned garden suburb.
10. That new strategic green infrastructure would be integral to the garden suburb, so it should not remain within the Green Belt. That this central parkland area should be excluded from the Green Belt does not weaken its protection or undermine its integrity. The Masterplan for BGS, which the Council is producing in association with East Herts District Council, would secure its delivery.
11. The reduced BGS allocation that the Council proposes would deliver a village-scale extension to Welwyn Garden City, whereas only the full BGS allocation could deliver an appropriately scaled garden suburb fully in accordance with Garden City principles as applied both nationally and locally, which would benefit an extension to England's second garden city to mark the centenary of its foundation and enable it to flourish into the second century of its life.