

## Comments on Welwyn Hatfield Local Plan Examination document EX227

This document has been prepared following WHBC's release of the "Note on Birchall Garden Suburb".

We welcome the Council's acceptance of the unsoundness of developing the southern fields alongside the A414. We also welcome their acceptance that, of the approximately 30 Hectares of site remaining, at most some 20 Hectares are effectively developable after allowing for essential non-residential features within the development. We have ongoing concerns regarding the revised proposals and policies as follows.

### Site capacity

The site proposes a net density of 30 DPH across the 20 developable hectares. Policy SP19 iv) states "Further from the town, lower density development of a more semi-rural character that responds to the locale and landscape will be appropriate". In previous hearings it has been discussed that 30 DPH is a reasonable upper limit for application of "Garden City principles". Policy SP19 vii a) states that "a wide mix of housing sizes, types and tenures" will be provided. Given that this site would clearly fit the description of "further from the town" then areas towards the southern and eastern edge of the proposed site should surely be significantly below 30 DPH to comply with these policies. This would fit with the earlier housing quantum of 500 rather than the 600 now proposed for SDS2.

### Green corridor and access arrangements

We welcome the inclusion in policy SP19 vii k) for a green corridor of at least 100m width crossing the site and linking with The Commons LNR. We are, however, concerned that this corridor is to be cut by the proposed loop road serving the site. The section of the note on access arrangements states that the loop road would be restricted to "a bus route only across the green corridor". If this is adopted then we fail to see how some of the houses developed could be accessed by private vehicle. Any roadway crossing the Green Corridor could dramatically reduce its effectiveness for key species. Without more detail on proposed development types and locations it is hard to see how these policies facilitate effective development of the site whilst delivering effective net biodiversity gain.

We note that the overall site access is via a proposed new road built across the old landfill site. We are concerned that the construction of this road will require significant penetration into the contamination across the site and, as a result, be risky and costly to deliver. When the Eastbound A414 carriageway was constructed on waste backfill in the late 1970's the waste was first compacted

at great cost to ensure the road did not subside over time. The alternative was to excavate and replace the full depth of waste along the whole carriageway route and was discounted due to cost, even for a trunk road. How will this local road differ in its cost and construction?

#### Facilities and services impacting sustainability

We note the acceptance that a group of shops would no longer be viable within the development but that the delivery of a 2 form entry primary school is retained within the plan. Surely the loss of the shops significantly affects the sustainability assessment of the site. The assumption is also made that the development will be served by a bus route but no evidence is presented to corroborate this. There does not appear to have been any update of the SA to demonstrate that the site still meets fundamental sustainability requirements.

#### Green Belt boundary

We welcome the revised proposal for the new Green Belt boundary. This means that the old landfill site is no longer released from Green Belt and therefore remains protected. It is not clear whether the Council still propose for the old landfill to become a recreational area including sports facilities and natural areas. This possible change in the proposed use of the land has large implications for the scale of contamination remediation required and thus for the deliverability and viability of the overall development. These facilities were also fundamental to the SA for the development.

#### Deliverability and Viability

Given all of the above points we now have significant concerns regarding the site viability and deliverability. We are told that the detail of the contamination remediation necessary including leachate interception and treatment, the actual size and location of the green corridor, the location and cost of the new school and community hall and details of the creation of the new access road are to be provided in the later masterplanning of the site. This would be normal practice however the specific constraints of this site render it far from normal. The publicly available site viability assessment for SDS2 Birchall Garden Suburb is now so out of date and weak that we are deeply concerned. The Council risks ending up with a key site in meeting the OAHN being effectively undeliverable within market constraints. For this reason robust clarity on these issues is essential before this site can be considered sound for inclusion in the plan.

Submitted on behalf of Central Herts Green Corridor Group

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