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Standing up for Hertfordshire's countryside

Mike Spurgeon  
Development Management  
East Herts District Council  
Wallfields  
Pegs Lane  
Hertford SG13 8EQ

Our Ref:

Your Ref:

26<sup>th</sup> October 2022 (by email)

Dear Mike Spurgeon,

**Application no. 3/22/1315/OUT**

**Land SE of Welwyn Garden City to the N of A414, and straddling Birchall/Cole Green Lane. Outline planning application with all Matters reserved except Access (apart from internal circulation) for the Proposed Development as shown on the Parameter Plan, Land Use Budget, Access Arrangements Plans and Mineral Extraction Plans, comprising: 2,650 new homes: sites for two primary schools and one secondary school, including associated sports facilities; two mixed use local centres, etc.....**

I write with reference to the above application for significant residential development adjacent to Welwyn Garden City, spreading across two Local Planning Authority areas, and known as Birchall Garden Suburb. We are writing to both the local authorities involved in similar terms to raise a number of concerns as these applications are developed further in the future.

The site lies within land either formerly or presently designated as London Metropolitan Green Belt in the adopted Local Plans of both councils. We are aware that the emerging Welwyn Hatfield Local Plan is still subject to extensive discussion and consideration, largely on the basis of local community concerns regarding the status of protected designated land. As such, the proposed development should be considered premature in relation to the Welwyn Hatfield part of the site and a departure from the current Local Plan.

The proportion of the site in Welwyn Hatfield remains as Green Belt where development would be inappropriate unless very special circumstances are demonstrated as required by the NPPF. The "uniqueness of the planning context for BGS(sic)" is quoted as constituting very special circumstances (PS para 4.23) and we would suggest that such consideration of the planning context means that a more detailed consideration of the proposals is necessary at this outline stage to achieve the appropriate quality of development.

The concept of the development of a "garden suburb" should not be taken lightly. CPRE Hertfordshire has been involved directly from its establishment as the Hertfordshire Society in reviewing and observing the development of "garden city" principles since the 1920s.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO  
Chairman: Allan McNab

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“Garden city and “garden suburb” principles (as demonstrated in the Brentham Garden Suburb in west London) comprise a comprehensive interconnected network of principles incorporating high quality urban design, open spaces and facilities, and the development of supportive community services and facilities in a holistic approach to urban planning. As such, the concept anticipates the achievement of much higher standards than is usually demonstrated in current speculative residential development.

We note that the present proposals are reflected in specific policy in the adopted East Herts Local Plan and the emerging Welwyn Hatfield Local Plan and the presumption is that these proposals are likely to be acceptable in principle. CPRE Hertfordshire would urge the two Councils to cooperate to assess the proposals robustly to ensure that they concur with the requirements of the “garden suburb” approach.

This requirement is strengthened considerably by the enactment recently of the Climate Change Acts and related legislation which places increasing responsibilities on LPAs to achieve development which takes full account of need to mitigate climate change effects. Similarly, the need to achieve net biodiversity gain is particularly important in substantial development such as is proposed in this case.

The Applicant’s Planning Statement (PS) notes that a Masterplan has been in preparation by architects Allies and Morrison during 2019 and 2020 but these applications are in advance of its completion. The Parameter Plan and illustrative Master Plan submitted give some indication of intentions but these are seen as “inconsequential” by the Applicants (PS para 4.7) and this may be seen as regrettable.

We would ask that both Councils work with the potential developer to ensure that any development is an exemplar with regard to both the expectations of “garden city/suburb” principles and the new requirements of climate change mitigation and the enhancement of biodiversity. This is clearly even more relevant than elsewhere given the location of the proposed development.

Yours sincerely,

Chris Berry  
Planning Manager