

Issue Number	Issue raised through consultation	Officer Response
General Issues		
11.0	The proposed development is on agricultural land, what will happen to the food production?	<p><b>No amendment to Plan in response to this issue</b></p> <p>The majority of the land is on contaminated land previously used for landfill and is therefore not considered as agricultural land. Where land is classified as agricultural it is Grade 3 only. The NPPF requires local planning authorities to protect prime agricultural land of Grade 2 and above.</p>
11.01	Land nearby was dismissed by WHBC in 2012 as it was not suitable to take forward. Why is this land any different?	<p><b>No amendment to Plan in response to this issue</b></p> <p>The context of planning in 2012 was different and this decision related to only one part of the land now currently proposed.</p>
11.02	This land could be subject to flooding.	<p><b>No amendment to Plan in response to this issue</b></p> <p>There are no defined flood plains through the site. As the land will need to be extracted for mineral reserves prior to development, matters of drainage will be resolved through the restoration of the land to a landscape that facilitates drainage. The detail of this will be incorporated in a detailed masterplan which will be collaboratively prepared by the two authorities, the developer and other stakeholders. Where mineral is not to be extracted first, the existing landscape facilitates natural drainage. This has already been taken in to account during the initial plan-making stages of this site and mitigation measures will be incorporated where necessary.</p>
11.03	The site should be consulted upon as a whole including both local plans (EHC/WHBC). This should also include the Panshanger Aerodrome site.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is understood that the Welwyn Hatfield Local Plan will be subject to consultation approximately two months before the East Herts District Plan. There will therefore be two opportunities to comment on the proposed site allocations. The cumulative impacts of development in this area, including the Panshanger Aerodrome will be taken into account, particularly for highways and education planning. As work on the masterplan progresses there will be a number of opportunities to engage in the details of the site.</p>
11.04	Current infrastructure in the area will not be able to cope with the scale of this development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The development will be expected to mitigate for all needs arising from the development and will create new and enhanced services that will benefit existing communities such as new bus routes and local services.</p>
11.05	Further development will increase congestion in an area	<p><b>No amendment to Plan in response to this issue</b></p>

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	that is already heavily congested. The A414, B195 and B1000 are at gridlock and this draft offers no solution to these issues. Birchall Lane continues to suffer from the Eco-Aggregates plant lorries. Are there any plans to improve local roads?	As part of a package of mitigation a number of improvements will be made to the local road network where related to the development. Herts. County Council Highways have been closely involved in the initial plan-making process of this site and a series of models have been used to test the potential impacts of this and other development on the wider major road network. The Eco-Aggregates site is currently subject to a Judicial Review process. Depending upon this decision, the plan will need to work around the site and ensure that the site operates within its current permissions and conditions.
11.06	The East Herts Draft District Plan Preferred Options Consultation was not delivered to residents on Birchall Lane. An explanation for this is required.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The leaflet distribution company has assured the council that the two properties in East Herts along Birchall Lane received leaflets. Regardless of this, the two properties engaged in the consultation exercise and responded with detailed comments.</p>
11.07	Public transport is not good enough to support this development. The bus service from Hertford to WGC/Hatfield is unreliable and inadequate. Development of this area could justify and East-West Light Railway/Tramline.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposal will provide new and enhanced bus services to mitigate the needs arising from the development. This will benefit existing communities.</p> <p>The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue. It should be noted however, that HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering East-West travel as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.</p>
11.08	Newspaper coverage of this proposal showed the development stretching from Panshanger all the way south to near Commons Wood Nature Reserve. This document only shows the section up to the East Herts District boundary so is giving a false impression of the scale of development in the area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Submission District Plan for East Herts will include a diagram indicating the full extent of the proposed development, including land within Welwyn Hatfield Borough. At the Preferred Option stage the extent of the possible development was unknown, therefore the Plan only included an indicative ellipse. Since then considerable cross-boundary discussions have taken place to inform this next stage and a joint approach will be set out in both the Welwyn Hatfield Local Plan and East Herts District Plan.</p>
11.09	WHBC and others believe that this development and the DPD should involve the joint working of the two councils as part of the duty to co-operate.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Agreed. There has been regular engagement between the two authorities and the County Council since the Preferred Options Consultation in order to inform this next stage. All Duty to Co-operate meetings are presented to the District Planning Executive Panel. It is now the view of Officers that</p>

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		the site should be allocated in each local plan supported by a detailed policy which will be jointly prepared by the two authorities. It is also agreed that the detail of the proposal should be dealt with through the preparation of a Supplementary Planning Document (SPD), which will enable collaboration with interested parties and stakeholders as appropriate as well as the site promoter.
11.10	Friends of Panshanger Park and others believe that development should occur in more rural areas beyond the green belt. There is too much development in the south of the district and an imbalance between urban and rural development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The NPPF makes it clear that development should be “sustainable”. To locate major development in the rural areas would require massive investment in new infrastructure to serve either a new settlement or a dispersed rural development approach. This level of infrastructure would not be deliverable within the Plan period. While this site will require a loss of Green Belt land, it is the view of Officers that there will be sufficient separation between the two towns and a well-planned development would not constitute sprawl.</p>
11.11	The area will function as part of WGC and will therefore meet the needs of the residents of Welwyn.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Agreed. Existing residents may also benefit from new services provided as part of the development, including new bus routes, local retail and services as well as for education.</p>
11.12	This development needs to be considered in the context of other development around WGC, Hatfield and Hertford.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The cumulative impacts of development have been taken into account, particularly on highways and education grounds. This is one of the roles of Duty to Co-operate.</p>
11.13	Tewin Grove Plot Owners advocate their own land for development above those being considered in the East Herts and Welwyn Hatfield plans.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Tewin Grove land is considered by Officers to be in an unsuitable location for development. This land was first suggested through the Issues and Options consultation and was considered as part of the Areas of Search appraisal work included in the Supporting Document.</p>
11.14	Councils should not look to build on airfields. Objection to plans to develop the Panshanger Aerodrome. It is a community and environmental asset.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Panshanger Aerodrome site is within Welwyn Hatfield District. Because of the potential cumulative impacts of development within this wider area the two authorities are indeed considering this site alongside land to the east of Welwyn Garden City. Any application would however, be managed by Welwyn Hatfield Borough Council. The Aerodrome has since ceased operating and is being promoted for residential development.</p>
11.15	Hertingfordbury Parish Council believes that the green “A414 Corridor” from St Albans to Hertford needs	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The Birchall Garden Suburb will be expected to maintain and enhance the green corridor through</p>

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	protecting.	this location, including the enhancement of the Cole Green Way as a strategic 'green' route between Hertford and Welwyn Garden City. More detail can be included in the policy.
Introduction		
11.16	The area is Green Belt land and plays a valuable role in preventing urban sprawl and the merging of Hertford and Welwyn Garden City (WGC). Development here will result in the loss of Green Belt and contravenes the purpose of the Green Belt. This development is against NPPF regulations on Green Belt. There will not be much green space left between the two towns. Brownfield sites should be developed instead.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has always sort to bring forward brownfield sites wherever possible. This includes the Goods Yard in Bishop's Stortford and the Mead Lane area in Hertford which are proposed for allocation within the District Plan. However, being a predominantly rural district, there are very few brownfield sites available. Therefore development on greenfield sites is required. Officers consider that sufficient land remains between Hertford and Welwyn Garden City that coalescence is not an issue. Well-planned development is not considered to be sprawl.</p>
11.17	The area is not well related to the town. The edge of WGC is already beyond walking distance of the centre and nearby train stations, where there are not enough spaces to park cars already. This would be a car-led development as there is doubt as to improvements in bus services. In addition, there are not enough jobs available locally so people will need to commute to work which will amplify issues with congestion and train capacity. New local employment is required.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposal contains not only an area allocated as employment land, but employment opportunities will also be created through two local centres and three schools. The site is within comfortable cycling distance of the town centre and station and will be connected by new and improved bus services.</p>
11.18	English Heritage (now Historic England) welcomes the reference to the surrounding areas of woodland to define the structure of the area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed. This will be a key part of the design principles for this site. While no amendment is proposed as a result of this issue, the proposed policy will require buffering between existing designated Wildlife Sites including areas of Ancient woodland and heritage assets within and in proximity of the site. The detail of this will be incorporated in a detailed masterplan which will be collaboratively prepared by the two authorities, the developer and other stakeholders.</p>
11.19	There should be more housing directed to villages to make them more viable and support local services. If the needs are generated by villages, the villages should accommodate the additional housing.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This option has been considered as part of the Plan-making process. There are only a small proportion of settlements where new development could be sustained by local services such as schools. These are identified in the Plan. Neighbourhood Planning also enables villages to identify</p>

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		areas of development to meet local needs.
11.20	WHBC objects to the statement that land to the East of WGC is required to address the unmet needs of the villages in the west of East Herts. More appropriate would be to allocate this land on the basis that it would meet WGC's needs.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The location of this site lies in the A414 corridor between two towns and therefore performs the role of providing for the shared needs arising from the towns and surrounding villages, which share travel to work and housing market patterns. Officers therefore consider that the site will meet the shared needs arising in this location and therefore the homes provided will meet the respective needs of the authority within which they are located: 1,200 within Welwyn Hatfield and 1,300 within East Herts. The infrastructure provided within the site as a whole will serve the development and areas beyond irrespective of whether they are East Herts or Welwyn Hatfield residents.</p>
11.21	HCC Schools Planning Team comments that the site is big enough to generate a need for between 2.9 and 5 forms of entry. Two 2FE primary schools would be needed, one of which should have the capacity to expand to 3FE over time. One secondary school should be provided (which could be a through school).	<p><b>No amendment to Plan in response to this issue</b></p> <p>Since the consultation, further investigation has been undertaken and the County Council's latest position is that the secondary school should be constructed to accommodate six forms of entry, with the potential ability to expand to eight forms of entry at a later date. In addition, two primary schools of two forms of entry with early-years provision will also be needed. There is potential for one of these to be designed as a through-school with the secondary school, to enable sharing of facilities.</p>
11.22	HCC comment that phasing is an issue with regards to the delivery of housing and school infrastructure. 450 homes proposed by 2031 would not support the delivery of a new school and existing schools would not be able to accommodate these pupils while a new school is constructed. The housing phasing needs to align with provision on infrastructure to serve the development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. While no specific amendment is proposed as a result of this response, the policy will refer to the need to ensure timely provision of community infrastructure to serve the development. The detail of this will be resolved through the preparation of a masterplan which will need to consider phasing and the delivery of infrastructure. If the site is delivered through different house-builders the masterplan and infrastructure delivery plan will inform each phase of development.</p>
11.23	The area is a natural extension to WGC, is adjacent to the local road network and would be a good example of collaborative work by East Herts Council and its neighbouring authorities.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
11.24	The area will rely on and add pressure to the infrastructure of WGC/Hatfield. Why should East Herts get the "New	<p><b>No amendment to Plan in response to this issue</b></p> <p>The number of new homes provided within each authority is almost the same. The community</p>

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	homes bonus” if the development is reliant upon WGC.	infrastructure provided within the East Herts part of the site will benefit existing residents of Welwyn Garden City through new local retail and services including education and bus networks. Future decisions regarding New Homes Bonus are not a matter for Plan-making. A Memorandum of Understanding will be agreed between the relevant authorities to deal with cross-boundary issues of governance.
11.25	Rail services cannot cope with current population. What will the Plan do to ensure extra capacity is provided to deal with extra demand?	<p><b>No amendment to Plan in response to this issue</b></p> <p>While the ability to directly affect service provision is beyond the scope of the Plan, discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail and are ongoing. These bodies will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses. Furthermore, when consultations regarding rail services affecting the district take place, the Council actively responds seeking to achieve improved service provision.</p> <p>Hertfordshire County Council is also currently in the process of updating its Rail Strategy which will also influence how train services can adapt to growing demand.</p>
11.26	The Cole Green Way is unsuitable for use, particularly in winter months.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While no specific amendment is proposed as a result of this response, this development offers the unique opportunity to improve and enhance the Cole Green Way as a strategic ‘green’ route between the two towns and settlements in between. The re-written policy will continue to refer to these on and off-site infrastructure improvements.</p>
11.27	Sewage and water supply infrastructure will be stretched by this development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has liaised with Thames Water throughout the plan making process. Thames Water has advised that Rye Meads STW has capacity to cater for all known growth in the wider sub-region up to, and beyond the end of plan period in 2033. In addition, the Council has also engaged with the relevant water providers in order to ensure that the proposed level and location of growth can be provided for.</p>
11.28	Schools in the area are oversubscribed and there is doubt as to the delivery of new schools being fulfilled.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While no specific amendment is proposed as a result of this response, the masterplan will include sufficient infrastructure and education facilities to accommodate the needs arising from the development. These facilities will also serve existing communities. The re-written policy will set out the requirement for these facilities and the detail of location and design will be resolved through the</p>

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		masterplan and the creation of the SPD. The plan-making process includes working closely with Herts. County Council to establish the necessary education requirements and the masterplan will include a phasing plan for their delivery alongside development.
11.29	Previous plans for a new hospital were scrapped. Existing healthcare facilities cannot cope, particularly with an ageing population. Lister will be majorly pressurised. There is poor health provision for rural areas and public transport is very limited to Lister.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While no specific amendment is proposed as a result of this response, the site will need to include local healthcare facilities as part of a neighbourhood centre. This will serve not only new residents but also existing residents. The re-written policy will set this requirement with the detail to be resolved through the SPD.</p>
11.30	Thames Water suggest an amendment: remove “ <i>and there is capacity in the sewer serving the area</i> ”. At this stage it is not possible to comment on capacity for homes post 2031. A growth upgrade investigation is being undertaken. An upgrade will then be undertaken to cater for growth at the appropriate time.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has liaised with Thames Water throughout the plan making process. Thames Water has advised that Rye Meads STW has capacity to cater for all known growth in the wider sub-region up to, and beyond the end of plan period in 2033. In addition, the Council has also engaged with the relevant water providers in order to ensure that the proposed level and location of growth can be provided for.</p>
11.31	What are the underlying mineral deposits? Will the area become an open cast mine for years to come? Will land stability be affected?	<p><b>No amendment to Plan in response to this issue</b></p> <p>The land is within the sand and gravel belt with two layers of sand and gravel separated by a clay middle layer. The proposal includes extracting only the upper layer of sand and gravel, which would take approximately 5.5 years. Progressive extraction, restoration and development is planned to reduce the overall schedule of extraction and development. The land has to be restored back to a developable platform so land stability will not be impacted. While no specific amendment is proposed as a result of this response, details of the method of extraction, depth of excavation and restoration back to a developable platform will be detailed in the masterplan and SPD. The re-written policy will set out this process.</p>
11.32	Adhering to WGC design principles is the bare minimum. These principles include open access to: the countryside, green spaces and the town centre.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Agreed. The jointly prepared policy will set out this requirement. The details of how this is translated into the masterplan will be detailed through the production of a SPD for the site.</p>
11.33	The villages between Hertford and WGC will be encroached upon. Being so close to the village of Cole Green will destroy the character of the village.	<p><b>No amendment to Plan in response to this issue</b></p> <p>There will remain sufficient separation between the site and the existing village of Cole Green that the character of the village will be unaffected.</p>

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11.34	The development will have a detrimental effect on the historic character of Panshanger Country Park and its historic setting/ and buildings. The impact on the setting of the park needs to be assessed fully in line with the NPPF. The park must be preserved.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>A Heritage Impact Assessment has been undertaken which indicates a need for an area of undeveloped land in the vicinity of heritage assets. The policy will therefore set this requirement and the detail will be resolved through the masterplan and the SPD.</p>
11.35	This development threatens the wildlife and biodiversity of The River Mimram (a rare chalk stream environment) and Panshanger Park. There should be a green buffer/ecological corridor around wildlife sites to ensure feeding and foraging grounds are protected.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>An assessment of all biodiversity assets will be carried out as part of the preparation of a masterplan using an approved methodology set by Herts Ecology or indeed carried out by Herts Ecology officers. It is intended that buffer planting and landscaping will form part of the overall design of the scheme. Improvements to the ex-landfill site will create a net-increase in the wider ecological network of green spaces along this corridor. The policy will set out these requirements and a long term habitat enhancement plan could be secured through the use of planning conditions.</p>
11.36	Adding development to the edges of both WGC and Hertford will detrimentally affect the character of both towns and the area in general.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Development can be designed to integrate well into the existing built fabric and depending on the facilities provided as part of the development, can quickly function as part of the existing community. While no specific amendment is proposed as a result of this response, the policy will set out the requirement to meet Garden City principles and the detailed design will be resolved through the masterplan and SPD.</p>
11.37	Recent developments on the edge of Welwyn Garden City do not relate to Garden City principles so doubt this site will. Do not want high-density, 3-storey buildings and a development that is urban in character.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While no specific amendment is proposed as a result of this response, it is proposed that there will be a mixture of densities throughout the site to reflect the existing character whilst balancing the need to make efficient use of land. The site will be planned to acknowledge its edge of town setting. These matters will be an integral part of the masterplan and the policy will set out this approach.</p>
11.38	The site is well used by residents for recreation purposes. Development would prevent this. Panshanger Park is too far for residents, meaning more car travel. Garden City principles include access to the countryside.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Apart from Public Rights of Way, the land in question is all under private land ownership and as such is not open countryside. The proposals will include a number of open spaces including a large public park with sports facilities. The plans will also include improved access to Panshanger Park and other areas of woodland within the site. While no specific amendment is proposed as a result of this response, the policy will set out the requirement to meet Garden City principles and</p>

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		the masterplan will detail how these elements will be planned.
<b>Development East of Welwyn Garden City</b>		
11.39	Figure 11.1 is very unclear and would benefit from having road names and more detail. Footpaths/bridleways across the park should be entered on the map as public rights of way.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The plan was only intended to be indicative. While no specific amendment is proposed as a result of this response, the next iteration of the District Plan will have more detailed diagrams and parameter plans for the whole of the cross-boundary site.</p>
11.40	HCC have tested the development of 1,700 homes in the Diamond model. Results indicated there would be capacity issues on the A414 junctions and local road links. Capacity improvements will be necessary and access achieved from local roads not the A414. HCC recommends that the cumulative impacts of development on A414 and A1(M) junctions will need to be assessed. Access to the site should be from the local road network rather than the primary route.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Hertfordshire Highways have been engaged throughout the plan-making process so far and their involvement in the preparation of the masterplan will ensure that appropriate highway mitigation and design measures are incorporated in the proposal. While no specific amendment is proposed as a result of this response, the policy will set out the requirement to ensure appropriate mitigation measures are planned for in collaboration with the County Council Highways Team.</p>
11.41	HCC state that capacity issues on the road network will impact on local bus routes. There needs to be sufficient connectivity by public transport and provision made for alternative means of transport, including dedicated bus and cycle ways. Further work will be necessary to address these issues, which will include joint working between LPAs.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Hertfordshire Highways have been engaged throughout the plan-making process so far and their involvement in the preparation of the masterplan process will ensure that appropriate highway mitigation and design measures including passenger transport services are incorporated in the proposal. While no specific amendment is proposed as a result of this response, the policy will set out the requirement to ensure appropriate mitigation measures are planned for in collaboration with the County Council Highways Team.</p>
11.42	HCC suggest there is potential for mineral sterilisation. Located in glacial sand and gravel belt adjacent to mineral resource block numbers 12 and 23. Further investigation required to establish extent of mineral reserve and the potential to extract and also to determine phasing of extraction and development of the site.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The Council is working closely with HCC Minerals Officers and through the preparation of the masterplan will establish the best scenario for mineral extraction, land remediation and delivery of development on the site. The policy will set out the requirement to ensure appropriate utilisation of the mineral resource is planned for in collaboration with the County Council Minerals Planning Team.</p>

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11.43	HCC say that there is further work to be carried out to determine whether this development is viable with regards to the mineral deposits nearby. It would be useful to include a reference to the Minerals Local Plan in the glossary. HCC are reviewing the Minerals Local Plan and will continue to engage.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The Council is working closely with HCC Minerals Officers and through the preparation of the masterplan will establish the best scenario for mineral extraction, land remediation and delivery of development on the site. The policy will set out the requirement to ensure appropriate utilisation of the mineral resource is planned for in collaboration with the County Council Minerals Planning Team. The Glossary will reference the Minerals and Waste Local Plans.</p>
11.44	Herts & Middlesex Wildlife Trust are pleased there will be a masterplan approach which considers environmental issues as an integrated part of the design process. This will also ensure planned provision of necessary infrastructure and enable public engagement.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. It is the intention that there will be a comprehensive programme of public engagement on the proposals both through the two local plans and also as part of the preparation of the masterplan process. The policy will set out the requirement to ensure that environmental issues are appropriately considered and mitigated and the detail will be resolved through the masterplan and SPD.</p>
11.45	Gascoyne Cecil Estates comments that 11.2.4 is vaguely worded and refers to land in the Welwyn and Hatfield Borough.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The whole settlement chapter will be re-written to ensure the most up-to-date information is presented. The Submission District Plan for East Herts will include a diagram indicating the full extent of the proposed development, including land within Welwyn Hatfield Borough. At the Preferred Option stage the extent of the possible development was unknown, therefore the Plan only included an indicative ellipse. Since then considerable cross-boundary discussions have taken place to inform this next stage and a joint approach will be set out in both the Welwyn Hatfield Local Plan and East Herts District Plan.</p>
11.46	Gascoyne Cecil Estates suggests 11.2.5 should be rephrased to read "Development Plan Document will be prepared by relevant landowners/developers.", there is no requirement to provide direct financial support to an LPA for a DPD.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>It is now the view of Officers that the site should be allocated in each local plan supported by a detailed policy which will be jointly prepared by the two authorities. It is also agreed that the detail of the proposal should be dealt with through the preparation of a Supplementary Planning Document (SPD) prepared concurrently with the preparation of the District Plan rather than be deferred to a Development Plan Document prepared following the adoption of the Plan. While there is no obligation to provide financial support for the production of a DPD, a certain amount of information is required to satisfy the authority that a site is deliverable in order to become an allocation in a Plan. This information would also be required to support a planning application so there are clearly benefits of working collaboratively to achieve the same result: an allocation in the District Plan followed by a successful planning application. It is important that the SPD is prepared</p>

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		collaboratively with all relevant stakeholders, led by the two planning authorities.
Policy EWEL1- Land East of Welwyn Garden City		
11.47	Stevenage Borough Council suggests greater certainty is required over this site. This site should not be thought to be meeting the needs arising from the Stevenage and A1 Corridor HMA unless it can be shown that all alternative options have been considered. A site to the East of Stevenage should be considered.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Plan-making process has considered all alternative sites, including land to the east of Stevenage. There is a clear relationship between towns in the A1(M) and A414 corridors in both economic (travel to work) and housing terms. This site's location means it will meet the needs of the towns of Hertford and Welwyn Garden City along with smaller settlements in the vicinity, contributing to meeting the overall needs of the A414 and A1(M) corridors.</p>
11.48	Herts & Middlesex Wildlife Trust states that impacts on ancient woodlands, natural habitats and wildlife should be mitigated. There should be a suitable buffer created between the development and wildlife sites/woodlands/Panshanger Park to make them more resilient. An assessment of potential impacts on the local and wider ecological network of environmental assets needs to be considered. Consideration should also be given for a green infrastructure/habitat creation plan.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The proposals will include a number of open spaces including a large public park with sports facilities. The plans will also include improved access to Panshanger Park and other areas of woodland within the site. An assessment of all biodiversity assets will be carried out as part of the preparation of the masterplan process using a methodology established and approved by Herts Ecology. It is intended that buffer planting and landscaping will form part of the overall design of the scheme. Improvements to the ex-landfill site will create a net-increase in the wider ecological network of green spaces along this corridor. A long term habitat enhancement plan could be secured through the use of planning conditions.</p>
11.49	Hertfordshire Gardens Trust comments that these areas are the setting for the registered Panshanger Park which contains many listed buildings. It is a unique landscape which incorporates the work of landscape architects Capability Brown and Humphry Repton. The tranquillity of this park is very important.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Heritage Impact Assessment has been undertaken and its findings will be fed in to the masterplan. This includes creating areas of buffer between heritage assets and development. Large parts of the Brown and Repton landscapes have been diluted over time. While no specific amendment is proposed as a result of this response, this proposal offers an opportunity to incorporate these landscape principles into the overall design, enabling access to greater areas of open space than currently restricted through private ownership. Outside of the Plan-making process, there are plans being prepared by Tarmac to restore parts of the Park through their long-standing restoration plan.</p>
11.50	Resident is concerned that houses on Birchall Lane will be demolished, as a result of this development. Architectural plans should look to relate to our properties.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While no specific amendment is proposed as a result of this response, this has been considered in the initial masterplanning work undertaken by the site promoter. The existing buildings along</p>

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		Birchall Lane will be maintained and will be protected by appropriate buffers. This approach will be set out in the joint policy and will be detailed in the masterplan and SPD.
11.51	Gascoyne Cecil Estates support EWEL1 and would be keen to be involved in preparing a DPD working with EHC, WHBC, HCC and other key stakeholders including Hertingfordbury Parish Council. Gascoyne Cecil Estates have large land interests in the area, including in the villages collectively known as “the Greens”.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Since the consultation Gascoyne Cecil Estates has withdrawn their land from consideration and it will therefore not be a part of the developable area. As landowners in the vicinity of the site there will still be an opportunity to engage in the masterplan at the appropriate stage.</p>
11.52	Friends of Panshanger Park and others object to EWEL1 due to the impact on the irreplaceable heritage asset Panshanger Park. Wildlife and archaeology of the park will be negatively affected. The proposed development is contrary to NPPF.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A Heritage Impact Assessment has been undertaken and its findings will be fed in to the masterplan. This includes creating areas of buffer between assets and development. Panshanger Park and its historic links to the wider Brown and Repton landscapes has been greatly diminished through mineral extraction and associated earthworks within the Park, and through the creation of the A414, which cuts through the southern-most section of the Park. It is the view of Officers that development will not negatively affect the historic significance of the Historic Park.</p>
11.53	Development will impact on the River Mimram and will lead to even lower water levels and threaten the water quality.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Developers will be expected to work closely with Thames Water to ensure appropriate management of water supply and waste water.</p>
11.54	Hertingfordbury Parish Council comment that infrastructure deficits need to be addressed before development can take place.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is not the role of development to remedy existing deficits. Section 106 regulations are quite clear that development should mitigate for impacts arising from development. The proposed infrastructure to be provided to support this development will go some way to address existing issues by providing new services including bus networks, local retail, employment and education facilities.</p>
11.55	Hertingfordbury Parish Council seeks to ensure that affordable housing is offered to residents within the Parish before being offered to external people.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Council holds and maintains the local register of those in need of affordable homes. Properties will be nominated using agreed criteria, some of which refer to local links. Part of the new affordable housing provision will be through the creation of Starter Homes, which will be open to anyone who wishes to purchase their first home.</p>

Issue Number	Issue raised through consultation	Officer Response
11.56	WHBC objects to the way EHC have dealt with the green belt boundary. The location of this development will require a change in the WGC green belt boundary. EHC have completed green belt studies at local/strategic level but not included any joint green belt work with WHBC.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Since the consultation, joint work has been undertaken by officers of both authorities to ensure an appropriate approach to Green Belt is taken. It is the view of Officers that the Green Belt boundary will be redrawn along stronger identifiable boundaries. This intention will be set out in the joint policy and will be detailed in the Policies Map of each local plan.</p>
11.57	Waitrose support the proposed development and request to be updated. The masterplan will enable feasibility work to be undertaken on the appropriate level of retail to be provided through the development given their existing store in Welwyn Garden City town centre.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. While no specific amendment is proposed as a result of this response, it is the view of Officers that the retail provided as part of this development should be in the form of a Neighbourhood Centre (within East Herts) and a Local Centre (within Welwyn Hatfield). These centres would perform a local role providing for day-to-day convenience retail (top-up shopping) and community facilities rather than competing with the town centre.</p>
11.58	Thames Water would be interested to comment on the DPD with regards to network, supply and treatment infrastructure.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Thames Water will be a key stakeholder in the production of a masterplan and subsequent SPD.</p>
11.59	This development will cause an increase in light and air pollution impacting on Panshanger Park.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While no specific amendment is proposed as a result of this response, appropriate distances will be maintained between the Park and the development area of the site. District Plan policy EQ4 prescribes how issues of air quality should be considered as part of specific development proposals.</p>
11.60	English Heritage (now Historic England) would like to engage further on the development of plans for this site and other surrounding Panshanger Park, including land to the west of Hertford. Historic England feels as if the evidence base for this development is incomplete. A study should be carried out in line with Historic England advice on managing change within the settings of heritage assets. Historic England request to be directly involved in the study.	<p><b>No amendment to Plan in response to this issue</b></p> <p>As per the request of Historic England, a Heritage Impact Assessment was commissioned using a brief that was approved by Historic England officers. They have also provided comments on drafts of the final Assessment. The recommendations of the HIA will inform the masterplan.</p>
11.61	Part I - HCC Schools support Part I of policy EWEL1 which identifies the need to test the feasibility of this site providing residential and supporting infrastructure uses.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. Following the Preferred Options consultation, the Council commissioned consultants to undertake a technical piece of work called the Delivery Study. This study assessed</p>

Issue Number	Issue raised through consultation	Officer Response
		the deliverability and financial viability of development to the east of Welwyn Garden City. In addition, the Council is working with site promoters in order to prepare a collaborative masterplan which will identify what the development will look like and how it will be delivered. As a whole, Officers consider that the evidence base provides a robust case for allocation of this site within the District Plan and to inform an understanding of the infrastructure required to support the development.
11.62	Part II- HCC Schools support Part II of policy EWEL1 as they would need to be involved in progressing this site.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. Officers from the County Council Education and Property teams have been engaged in the plan-making process so far and will continue to be engaged in the preparation of a masterplan for this site.</p>
11.63	Careful consideration will be needed to ensure development here does not conflict with Policy HA8 – Historic Parks and Gardens. English Heritage (now Historic England) recommends undertaking an assessment of the sensitivity and capacity of this area for development, which should include consideration of the cumulative impacts of all developments in the vicinity. This should be done collaboratively with a stronger commitment to joint working.	<p><b>No amendment to Plan in response to this issue</b></p> <p>As per the request of Historic England a Heritage Impact Assessment was commissioned using a brief that was approved by Historic England officers. They have also provided comments on drafts of the final Assessment. While no specific amendment is proposed as a result of this response, the recommendations of the HIA will inform the masterplan. The Assessment was commissioned and project managed jointly between Welwyn Hatfield and East Herts officers.</p>
11.64	Policy EWEL1 Part III (b) - English Heritage (now Historic England) are pleased to see reference to design codes and the approach to Garden City principles, given that the site adjoins WGC.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. The policy will set the requirement for the development to meet Garden City principles which inform the masterplan and SPD for this site.</p>
11.65	Policy EWEL1 Part III (b) - Gascoyne Cecil Estates has an adopted building code for the Hatfield House Estate and would wish the document to influence and ensure high quality design. The site should be comprehensively planned to ensure a high quality approach to building design, layout and the wider landscape.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Hatfield House Design Code is very detailed and specific to that particular setting. While no specific amendment is proposed as a result of this response, a similar approach to design will be incorporated into the Supplementary Planning Document, which will be comprehensively planned.</p>
11.66	Policy EWEL1 Part III. (b), (c) and (d) - WHBC state that as this land would function as part of WGC these aspects of the DPD will need to be consistent with the approach taken in WGCs Local Plan. Development in this location should	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The Policy will be re-written jointly with Welwyn Hatfield officers and will incorporate Garden City principles. The Supplementary Planning Document will also be jointly prepared.</p>

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	follow Garden City principles.	
11.67	Policy EWEL1 Part III. (c) - Bungalows are needed to accommodate an ageing population alongside essential local community facilities.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>A wide range of accommodation will need to be provided on this site to ensure a mixed and sustainable community. Local services such as retail, employment and education facilities will ensure that there are focal points of community activity for new and existing residents. This will be written in to the policy and the detail resolved through the SPD.</p>
11.68	Policy EWEL1 Part III (e) - Gascoyne Cecil Estates wish to ensure that new development proposals are in accordance with their adopted Building Design Codes and masterplanning standards, adhering to the principles of the 'Green Corridor Strategy' which includes opportunities to: link existing green infrastructure assets, improve footpaths/cycle routes and minimise visual coalescence between settlements.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposals will include a number of open spaces including a large public park with sports facilities. The plans will also include improved access to Panhanger Park and other areas of woodland within the site. Improvements to the ex-landfill site will create a net-increase in the wider ecological network of green spaces along this corridor. While no specific amendment is proposed as a result of this response, this development offers the unique opportunity to improve and enhance green infrastructure networks such as the Cole Green Way as a strategic 'green' route between the two towns and settlements in between.</p>
11.69	Policy EWEL1 Part III (e) - HCC state that the DPD area includes woodland wildlife sites that must not become isolated by new development. There should be corridors linking these sites.	<p><b>No amendment to Plan in response to this issue</b></p> <p>An assessment of all biodiversity assets will be carried out as part of the preparation of the masterplan using a methodology established and approved by Herts Ecology. While no specific amendment is proposed as a result of this response, it is intended that buffer planting and landscaping will form part of the overall design of the scheme. Improvements to the ex-landfill site will create a net-increase in the wider ecological network of green spaces along this corridor. A long term habitat enhancement plan could be secured through the use of planning conditions.</p>
11.70	Policy EWEL1 Part III. (e) - Herts Ecology supports this part of the policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. The requirement to plan appropriately in relation to natural and historic assets will remain a key principle in the development of this site and the details of such measures will be included in the masterplan and SPD.</p>
11.71	Policy EWEL1 Part III (e) - Herts & Middlesex Wildlife Trust comment that development needs to avoid impacting on natural and historic assets, and to plan to mitigate and compensate for unavoidable impacts, providing net gains to	<p><b>No amendment to Plan in response to this issue</b></p> <p>An assessment of all biodiversity assets will be carried out as part of the preparation of the masterplan using a methodology established and approved by Herts Ecology. While no specific</p>

Issue Number	Issue raised through consultation	Officer Response
	biodiversity through maintaining, restoring and enhancing ecological networks. A long-term green infrastructure and habitat enhancement plan should be prepared. This will need to take account of impacts on woodlands in the area and within Panshanger Park such as from recreation, dog walking and cat predation.	amendment is proposed as a result of this response, it is intended that buffer planting and landscaping will form part of the overall design of the scheme. Improvements to the ex-landfill site will create a net-increase in the wider ecological network of green spaces along this corridor. Such improvements may act as an alternative destination for recreational purposes to Panshanger Park. A long term habitat enhancement plan could be secured through the use of planning conditions. Issues such as cat predation can be managed by appropriate buffer and boundary treatments.
11.72	Policy EWEL1 Part III (e) - WHBC suggest it would be helpful if the DPD could address green infrastructure on a wider scale by improving the green links along the Mimram and Lea Valleys.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This development offers the unique opportunity to improve and enhance green infrastructure networks in line with Welwyn Hatfield's plan to enhance the green infrastructure corridor along the Mimram and Lea Valley corridors and beyond.</p>
11.73	Policy EWEL1 Part III. (f), (g) and (h) - Development needs to be sustainable in design, which takes account of climate change issues.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The policy will set out the requirement for the development to incorporate sustainable design standards. This level of detail can be further secured through the detailed masterplan and SPD.</p>
11.74	Policy EWEL1 Part III (g) - Gascoyne Cecil Estates questions the type of District Heating system envisaged and its impact on the Green Belt.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>It is acknowledged that this criterion is too prescriptive and should be deleted. Instead, it is expected that development proposals should comply with the provisions of district-wide policies in the Plan, notably, the Climate Change chapter.</p>
11.75	Policy EWEL1 Part III (g) - WHBC objects to criteria (g) as it is not clear from the document that EHC have the necessary evidence to show that this is a practical provision.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>It is acknowledged that this criterion is too prescriptive and should be deleted. Instead, it is expected that development proposals should comply with the provisions of district-wide policies in the Plan, notably, the Climate Change chapter.</p>
11.76	Policy EWEL1 Part III (i) - Gascoyne Cecil Estates questions the need for a new Secondary school to cater for 1,700 dwellings. Landowners/developers should only have to produce facilities in relation to their development and not the wider area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The overall development will be for between 2,500 and 3,000 homes. This will generate a need for between five and six forms of entry. The latest advice from Herts. County Council is that there is a need for approximately 10 forms of entry within Welwyn Garden City. Work is currently ongoing to establish a suitable site for another school to serve the town. In order to future-proof the site against rising needs throughout the Plan period it is appropriate to plan for a site to accommodate at least a six-form entry school, with the potential to expand for eight forms of entry in the future. The latest information will be reflected in the policy.</p>

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11.77	Policy EWEL1 Part III (i) - HCC Schools support this aspect of the policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
11.78	Policy EWEL1 Part III (i) - Sport England objects to criteria (i) due to the omission of a specific need to provide indoor and outdoor sports facilities as part of the social infrastructure.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>It is envisaged that the secondary school will be constructed to a design that can accommodate community use of both indoor and outdoor facilities, through a secondary access from Panshanger Lane. Outdoor pitches will also be included in the masterplan along with facilities to enhance Moneyhole Lane Park, in conjunction with the development at the former Panshanger Aerodrome, which will be allocated in the Welwyn Hatfield Local Plan for residential development. This will be written in to the policy and the detail resolved through the SPD.</p>
11.79	Policy EWEL1 Part III (l) - Gascoyne Cecil Estates questions the meaning of “wider strategic and local highways mitigation measures”. What impacts are envisaged along the A414 and A1(M).	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Wider strategic highways mitigation measures include alterations to the strategic road network such as the A414 junctions immediately adjacent to the site. Birchall Lane will also require improvements through alterations to its alignment plus additional access points to serve the development. The cumulative impacts of which will form part of ongoing discussions with Herts. County Council Highways. The policy will be re-written and the detail resolved through the SPD.</p>
11.80	Policy EWEL1 Part III (m) - Gascoyne Cecil Estates questions the sort of sustainable transport measures proposed?	<p><b>No amendment to Plan in response to this issue</b></p> <p>The masterplan of the site will ensure that walking and cycling routes receive a high priority in the network hierarchy, ensuring that routes for pedestrians, cyclists and buses are more direct than for private vehicles in order to encourage a modal shift. While no specific amendment is proposed as a result of this response, new and enhanced bus routes will be required to serve the development and to connect to the town centre. This detail will be covered in the masterplan and SPD.</p>
11.81	Policy EWEL1 Part III (n) - Gascoyne Cecil Estates questions the level of retail and employment envisaged? Should be re-phrased to read “create a balanced mix of uses in a coherent form”.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The type and quantum of retail and employment facilities will be detailed in the masterplan. Officers currently envisage that two local centres will be required containing local retail and community facilities. Employment land should be allocated along Birchall Lane itself to ensure it is visible and accessible. The policy will be re-written to refer to the possible variety of uses.</p>
11.82	Policy EWEL1 Part III (o) - Gascoyne Cecil Estates suggests rephrasing as “include appropriate measures for long term governance and management of recreational	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>This detail will be covered in the masterplan and SPD. The policy will be re-written to ensure the long-term management of community assets are planned for and do not become a financial or</p>

Issue Number	Issue raised through consultation	Officer Response
	areas, green infrastructure and strategic landscaping.	administrative burden for future occupiers, users or the local authorities.
11.83	Policy EWEL1 Part III (r) - Gascoyne Cecil Estates believes criteria (r) should be rephrased to “all necessary infrastructure reasonably related in scale and kind to the proposed development”.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The policy will be more specific about the expected provision of or contributions to necessary infrastructure. This detail will be covered in the masterplan and SPD.</p>
11.84	Policy EWEL1 Part III. (s) - HCC Schools support this aspect of the policy	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted.</p>
11.85	Policy EWEL1 Part III (t) - Gascoyne Cecil Estates believe that criterion (t) is unnecessary.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Agreed. The Plan should be read as a whole. However, the inclusion of this type of reference is necessary when there are matters of detail in other parts of the Plan that may be relevant and not appropriate to repeat in this site-specific policy. The re-written policy will need to refer to the two Local Plans and to the Hertingfordbury Neighbourhood Plan where appropriate.</p>
11.86	Policy EWEL1 Part V- English Heritage (now Historic England) welcomes the provision of a Country Park as a condition. Improving access to the Park will help to promote public appreciation of this valuable historic landscape. The Park should form part of a robust barrier to coalescence between the two towns not the only barrier.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed. Interestingly, the Friends of Panshanger Park object to this criterion (see Issue 11.89 below). The re-written policy will not refer to Panshanger Park except in terms of improving access to it in the context of improving green infrastructure networks in general. Setting out the role of the Park and the necessary approach to buffers and boundary treatments will meet the ambitions of Historic England without confusing matters about previous development obligations.</p>
11.87	Policy EWEL1 Part V - Herts Ecology and WHBC support this aspect of this policy.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed. However, the Friends of Panshanger Park object to this criterion (see Issue 11.89 below).</p>
11.88	Policy EWEL1 Part V- English Heritage (now Historic England) states that there needs to be a distinction between the Panshanger Country Park, Panshanger Park and the Panshanger Estate.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The re-written policy will not refer to Panshanger Park except in terms of improving access to it in the context of improving green infrastructure networks in general. The role of the Park and the necessary approach to buffers and boundary treatments will meet the ambitions of Historic England without confusing matters about previous development obligations.</p>

Issue Number	Issue raised through consultation	Officer Response
11.89	Policy EWEL1 Part V - This section states “A new Country Park shall be provided...”. This is not a correct description of the current situation. This has been planned for 30 years and its opening to the public cannot become a condition of building proposed homes. This error could jeopardise the integrity of the plan.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The re-written policy will not refer to Panshanger Park except in terms of improving access to it in the context of improving green infrastructure networks in general. The role of the Park and the necessary approach to buffers and boundary treatments will meet the ambitions of Historic England without confusing matters about previous development obligations.</p>
11.90	Policy EWEL1 Part V- Gascoyne Cecil Estates state that there should be no linkage between the new housing at EWEL1 or WGC5 and the restoration of Panshanger Country Park.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The re-written policy will not refer to Panshanger Park except in terms of improving access to it in the context of improving green infrastructure networks in general. The role of the Park and the necessary approach to buffers and boundary treatments will meet the ambitions of English Historic England without confusing matters about previous development obligations.</p>
11.91	Gascoyne Cecil Estates object to the part of the site within Welwyn Hatfield known as WGC5, particularly on the southern edge along the A414 for reasons of coalescence (between Welwyn Garden City and Hatfield), visual impact on the historic villages of Essendon and West End and on Hatfield House and Historic Park. The rising topography of the land will make development visually prominent.	<p><b>No amendment in response to this issue</b></p> <p>The jointly commissioned Heritage Impact Assessment for Panshanger Park and its Environs has considered the potential impacts of development in this area on the setting of the Grade I listed building and Historic Park and Garden of Hatfield House. The report indicates that there may be an encroachment into the broad rural countryside setting to the east of the House. However, the distance between the development site and the House is still far enough that impacts are somewhat mitigated. The masterplan for the development will ensure that mitigation is provided through landscaping and design principles. The proposed development site may be visible in very long views from the villages of Essendon and West End, but these views are disrupted by other landscape features including the A414 itself. However, given the distance of the village from the site, Officers consider that there is no harm to the setting of the Essendon Conservation Area, or on the outlook from high points in the village.</p>
11.92	Gascoyne Cecil Estates as landowner of large tracts of land in this area take a long-term view to the management of their landholding and consider that the aims of the draft policy could bring substantial benefits to Welwyn Garden City.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted. It is the intention that development brings benefits to existing and new communities.</p>