

Examination of the Welwyn-Hatfield Local Plan 2013-32

Potential additional sites, for housing development, at villages excluded from the Green Belt.

INSPECTORS' MATTER AND ISSUES

Consultation was undertaken about these sites, along with others, following the Council's deliberations on a way forward and in the early part of 2020. All representations received at that time will be considered and it is not necessary for them to be repeated verbatim.

Any representors wishing to make further submissions on the matters and questions listed below, should do so by 5.00pm on Friday 12 February.

The Inspector has concerns about the overall soundness of the nature and distribution of sites proposed for housing development. The Inspector referred to this in the context of the additional sites that the Council placed before the Examination on 30 November 2020 in his reply of December 2020. (examination document EX220). In particular he has concerns about the justification of exceptional circumstances to remove sites from the Green Belt, in a number of instances, particularly in the context of the comparative harm to the Green Belt and the relative sustainability of alternative sites.

The Inspector has therefore decided to examine all of the sites that passed the Council's site selection process in 2019, in order to test the soundness of their subsequent rejection by the Council.

SUBMISSION FROM

WELWYN PLANNING & AMENITY GROUP

12th FEBRUARY 2021



Welwyn

Matter 2 – Sites Wel1, 2, 6 and 15, Land at Fulling Mill Lane and Kimpton Road.

This proposal contains four individually promoted sites that are located on the north-western side of Welwyn village and surround its cemetery. Together, their development could provide about 250 dwellings. When assessed either cumulatively or individually, the sites are considered to cause moderate-high harm to the Green Belt's purposes. Because of infrastructure concerns, relating to the need to widen the bridge on Fulling Mill Lane and the highway along that lane and along Kimpton Road, it is not considered economically viable to develop these sites, other than on a comprehensive basis.

WPAG: General Comments Regarding This Matter

The Welwyn Planning and Amenity Group (WPAG) is a long-standing local group, active since the 1960s and a registered charity since 1976. It is constituted to safeguard and nurture the environs of Welwyn village, Welwyn parish and the surrounding area. It collaborates closely with Welwyn Parish Council, Welwyn Hatfield Borough Council and Hertfordshire County Council, as well as with other local groups, particularly on planning matters.

The character of Welwyn village is exemplified by its inhabitants' close connection and proximity to the surrounding countryside, which is predominantly fields used for arable farming or grazing horses, and some woodland. With the eastern side of the village bounded by the A1(M) motorway, and the fields to the west and south held privately, there are remarkably few routes to access the countryside from the village itself. The north-western part of the village is where the countryside comes right into the community.

It does this in two clear ways. First, the fields to the west and north of the Hawbush area present a wide rural vista to residents throughout the south-western part of the village (where the majority of the houses are). This vista is also a large part of the character of the north area (Danesbury, overlooking it from the hillside) and the north-western sector (Oakhill Drive/Kimpton Road) of the village.

Second, Singlers Marsh and the cemetery are much-loved semi-rural areas that are easily accessible directly from the village. Their character stems directly from having this rural setting, being surrounded by large expanses of natural environment. Singlers Marsh is the focal point for a regular calendar of community events. Its combination of unimpeded public access, immediate connection to nature, and sense of history is much cherished and is also unique within the WHBC area.

This is the background to our response to the possibility of developing these four promoted sites. They would surround the cemetery with a large area of housing, they would be visible from Singlers Marsh and so change its character substantially, they would alter Hawbush from being at the edge of the countryside to being merely part of a housing sprawl, and the growth in traffic plus the construction of the access roads would materially affect Singlers Marsh directly.

WHBC has made it clear that developing these four sites would require expansion of the access road network at the expense of Singlers Marsh itself. It is worth noting that making use of Singlers Marsh's land has never been the subject of any consultation exercise. Given its multiple statuses as a registered wildlife site, nature reserve and site of archaeological interest, and it being host to a rare and already threatened chalk stream, such a consultation exercise would be far from straightforward.

In addition, Singlers Marsh has recently become the subject of an application to register it as a Village Green. This application is now classified as having been "duly made" by Hertfordshire County Council. HCC officers' reading of the relevant legislation is that any trigger event which occurs after an application is duly made cannot then be retroactively applied to block the registration process. It is likely that a formal legal opinion will be required in such a circumstance. This would, in turn, likely be challenged by opponents of the development.

One further problem posed by using Singlers Marsh for access to these sites is that it is owned by WHBC, who would gain financially from selling it to provide access to these sites. This presents an obvious conflict of interest between its required functions of financial stewardship and independent planning authority. Should development proceed using Singlers Marsh land, we again foresee a likely legal challenge from parties concerned to preserve this land for the village community.

Combining the total lack of any consultation to date with the prospect of multiple legal challenges, WPAG contends that there are major obstacles to being able to use Singlers Marsh's land to provide suitable access to these development sites.

Considerations

13. Is there any objective basis on which the assessed Green Belt harm could be challenged, or the weight given to the findings reduced?

WPAG comment:

There are two objective reasons to take the opposite view, given that the assessed Green Belt harm has been underestimated.

First, the fundamental contribution to Welwyn's rural setting of the overall area containing these four sites means that, taken as a whole, their combined development would cause more Green Belt harm than just considering the harm posed by developing each site individually - ie "the whole is greater than the sum of the parts." If they are to be developed as a single bloc then the overall Green Belt harm has been clearly underestimated by the existing site-by-site assessments.

Second, the existing site-by-site assessments do not consider any of the consequences of using Singlers Marsh land to provide an access road to these sites. The direct loss of part of this nature reserve, wildlife site and fragile chalk river

ecosystem to create an access roadway has not been considered in the current site-by-site assessments in any way at all.

14. There would clearly be a need to establish a new permanent and easily recognisable boundary to the Green Belt.

Where should this be located within Site Wel1, in order to prevent any impact from built development, on the four sites, causing harm to the wider Green Belt to the south?

WPAG comment:

We have no comment to make on where this boundary should be placed, other than to note that having such a boundary within the site would limit how many homes could be built on it. This would work against the requirement stated above that economic viability of these sites requires development to be “comprehensive”.

15. What harm would result from the coalescence of Oakhill Drive with the main built up part of Welwyn village?

WPAG comment:

The homes at Oakhill Drive, Fulling Mill Lane and Kimpton Road form a distinct community. This distinctiveness would clearly be washed away through coalescence with the rest of Welwyn village. This would substantially change the character of this community - a direct harm arising from the coalescence.

Indirect harm would also arrive from increased strain on the road network in the immediate area. Even if we ignore the contentious issue of widening the access from Codicote Road by using Singlers Marsh land, the other local roads cannot be upgraded to cope with the extra traffic, namely the westbound section of Kimpton Road out towards Pulmer Water and the northbound section of Fulling Mill Lane towards Codicote. Both of these are single-track roads for much of their length with little scope to widen them, and can be expected to become congested with the increased traffic flows from these four sites.

16. Would the necessary off-site highway infrastructure work impact upon the site of the Local Nature Reserve at Singlers Marsh?

WPAG comment:

Yes.

Singlers Marsh is both a Local Wildlife Site and a Local Nature Reserve. The required highway infrastructure would consume part of the southern end of the Singlers Marsh land.

There has been no consultation exercise about any of the various effects on the nature reserve or wildlife site of reducing the land and creating the highway infrastructure. This has been confirmed by WHBC in a statement made at their Cabinet meeting on 9th February 2021 (WPAG's analysis of this situation can be found at <https://www.wpag.org.uk/analysis-of-whbc-response-to-wpag-regarding-singlers-marsh-and-local-plan>). Clearly, there will be a direct impact on the natural environment arising from such work. The extent of the impact has not been assessed, due to the lack of consultation.

What we do know is that Singlers Marsh is indeed a marsh. At the time of writing this submission (10th February 2021), it is heavily flooded after several weeks of intermittent heavy rain. This flooding has not occurred due to any bursting of the river banks; rather, the water table has risen above the surface of the lower-lying parts of the land. This happens specifically at Singlers Marsh because of its location at the bottom of a river valley, hosting as it does the river Mimram.

The 2019 consultation considered mitigations for the rain run-off at Singlers Marsh that would arise from each of the four proposed sites. It did not consider any of the consequences for flooding of expanding the highway infrastructure into the marsh land. The southern section of Singlers Marsh contains a substantial north-south depression known as "the Drain", which is the original line of the river. It is the first part of Singlers Marsh to fill up with standing water during wet weather. The Drain would, ideally, itself drain into the Mimram, but is unable to do so because of the presence of Fulling Mill Lane at its southern edge. Widening the roadway here is required in order to access these four promoted sites. This would expand it into the Drain, making the road itself prone to flooding and complicating the challenge of managing the flooding on the land. Mitigations would be at the expense of more of Singlers Marsh's land area.

By way of illustration, the following two photographs were taken on 9th February 2021 at Singlers Marsh:



Photograph 1: Facing West on the southern part of Singlers Marsh (the river is behind the photographer). The Drain is full of flood water.



Photograph 2: Facing West on Fulling Mill Lane at the southern end of Singlers Marsh (the junction showing to the left is Riverside). This drainage ditch is full of water and close to spilling onto the road.

Any expansion of the roadway would require additional drainage measures to protect the road against flooding, which would consume more of the Singlers Marsh land to the further detriment of its complex natural environment.

The Mimram itself is a fragile ecosystem. It is a chalk stream, one of a small number of “globally unique water environments”. That quotation is taken from a document published last month by the Environment Agency: “*River Basin Management Plans 2021 - Challenges and Choices consultation summary report*” (Version 1, 25 January

2021). This document feeds into the creation of an updated management plan for the Thames river basin (which includes the Mimram), among others. It highlights the importance of “protecting chalk streams” from “physical modification” and to provide them with “additional protection”.

The Mimram’s ecosystem is already fragile. It has dried up completely on two occasions in the past fifteen years. It is still recovering from the most recent drying up in 2019, with birdlife and fishes visibly at far lower numbers than before. We do not claim that widening the road at Singlers Marsh will worsen the drying up of the river, but many people are genuinely worried that adding a further roadway across the Mimram can only add to the damage being done to its ecosystem.

The nature of widening Fulling Mill Lane along the southern edge of Singlers Marsh will require a new road bridge to be constructed (as the current bridge cannot be widened). Due to the presence of electrical supply infrastructure alongside the existing bridge, any new crossing would have to start at least 2 metres into the marsh from the current bridge. We believe that any new roadway would have to be a minimum of 5.5 metres wide (which is the width of the roadway built for Wilshere Park when it was developed at the southern end of Welwyn in recent years). With kerbside infrastructure, this becomes at least 5.8 metres wide. If a drainage ditch is required (see above), this would add at least 2 metres of further incursion into Singlers Marsh. If a cycle lane is needed for traffic reduction measures, then that would need 1 metre’s extra width in each direction. A footpath alongside the roadway would also be needed, adding a further 2 metres of width.

In total, the incursion into the marsh would (on these estimates) be of the order of 14 metres. As context, the current bridge sits at the southern limit of Singlers Marsh. Northwards from the bridge, the open land connects straight to the water’s edge for a stretch of 76 metres. Beyond this, the river is shielded from the open land by bushes and trees and, further up, by private gardens. Surprisingly, this 76 metre stretch of open river bank happens to be the only part of the Mimram that is easily accessible to the general public along its entire 12 mile length, apart from at four fords and at its source in Whitwell - the Mimram otherwise flows through privately-held or inaccessible land.

By simple arithmetic, removing these 14 metres would reduce the publicly-accessible portion of the river along its entire length from source to confluence by a substantial 18%. Moreover, constructing a substantial new road bridge over the Mimram would create further challenges to the river’s already precarious ecology.

17. If there would be any harm to the Local Wildlife site, how extensive would this be, and would it be significant?

WPAG comment:

Please refer to our response to Question 16 above.

18. Could such harm be adequately mitigated or compensated for?

WPAG comment:

The main harm arises from removing land from the marsh to build a road and accompanying flood defences. The only way to avoid this harm would be to not remove that land. Any other ecological mitigations would be wholly unproven.

Harm also arises from reducing the scope for natural drainage of the marsh. Mitigation via artificial drainage measures would unavoidably be at the expense of more of the land area.

The addition of a new road bridge across the Mimram poses its own ecological challenges to the chalk stream. Even if the effect of the bridge construction on the ecosystem can be mitigated, the increased traffic from the housing developments will create substantial noise and pollution that will directly affect the wildlife here.

Without having performed any consultation on the effect of developing on Singlers Marsh, it is difficult to state how much mitigation could be possible, but it appears unlikely to be sufficient.

19. What impact would the proposed development have on ecological assets within or adjacent to any of the individual sites and to what extent could this be mitigated or compensated for?

WPAG comment:

We have no specific comment to make about the individual sites in this regard.

20. Should some or all of the trees on the site(s) be retained and their retention referred to in the policy criteria?

WPAG comment:

We have no specific comment to make about the individual sites in this regard.

However, it should be noted that widening Fulling Mill Lane will mean the removal of a whole treeline along the northern side of its approach towards the river. This would not only damage the wildlife habitat but would also increase the visibility of the substantially increased levels of traffic using the new roadway from the sites.

21. To what extent could development on any of the sites harm heritage assets (including archaeology)?

WPAG comment:

WPAG has consulted a leading professional archaeologist at University College London to understand this situation.

The area around Welwyn is rich in Roman and Iron Age (pre-Roman) remains. Iron Age burials have been discovered within the village near School Lane and Prospect Place. Local Roman buildings including a bath house, a villa and a mausoleum are well known. Discoveries from the area around Welwyn are on prominent display in the British Museum, and a particular style of Iron Age burial is specifically named as a “Welwyn-type burial” after the area.

Wel15 is regarded by the archaeological establishment as containing the centre of the Roman (and possible also the pre-Roman) settlement at Welwyn. This is based on analysis of the spatial distribution of individual finds across the village. No archaeological investigation has been undertaken within the Wel15 area previously, and it is expected to be rich in archaeological finds. Intensive development of this site would lead to the permanent loss of those archaeological remains not uncovered during the typically small-scale pre-construction surveys.

The southern end of Singlers Marsh is also believed to contain substantial Roman, pre-Roman and post-Roman remains. This is due to the construction method used for building Link Road. The cutting for Link Road went through a previously unknown Roman cemetery. Construction regulations at the time did not require any archaeological investigation, and the spoil from the cutting was distributed on the southern end of Singlers Marsh. It was only by chance that an archaeologist who lived in the village discovered what was in the spoil, but it was too late to investigate it. Archaeologists remain keen to explore what was deposited on Singlers Marsh at that time. The widening of Fulling Mill Lane would be at the loss of a portion of those deposits.

22. Could any of this be significant?

WPAG comment:

(We assume this question relates to the heritage/archaeology topic.)

Welwyn appears to have been continually occupied from the Iron Age through to the present time. Known archaeology in the area goes back for at least 2,100 years. There are also Bronze Age remains in the area, highlighting the possibility of even longer permanent occupation. As such, Welwyn is presumed to have been a major population centre in the pre-Roman era. It is therefore likely that there is significant archaeology to explore in this area. However, it has not previously been investigated at all, and to lose it to development would be a major loss to the region’s heritage.

23. Could any perceived harm be appropriately mitigated?

WPAG comment:

(We assume this question relates to the heritage/archaeology topic.)

An extensive archaeological survey and excavation over the entire area would be the only way of ensuring no loss of the heritage due to the housing developments or the highway infrastructure construction.

24. In the context of the site's proximity to retail and community facilities and frequent public transport; to what extent can each of the constituent parts be considered to be a sustainable location for development?

WPAG comment:

Contrary to various WHBC reports, Wel1 and Wel6 are not within satisfactory distance of public transport. Although there is a bus stop on Codicote Road, it is over 500 metres from these two sites. There are maps that indicate bus stops in the Hawbush area (which would be within an acceptable distance of these sites) but this is just an occasional minibus service running only a couple of times per week to take people shopping in Welwyn Garden City. School Lane and the various roads in Hawbush are too narrow, and too busy with on-street parking, to allow a bus to reliably pass.

Wel1 and Wel6 are also too far from the village centre to expect residents to walk to the shops on Welwyn High Street. With limited parking available on the High Street, the likely outcome is that residents will drive to Welwyn Garden City for their shopping. It is probable that housing developments at these sites will do little to sustain the village's retail sector.

25. Are there any issues affecting highway safety and/or the free flow of traffic in this part of Welwyn that are incapable of satisfactory resolution?

WPAG comment:

WPAG understands that the promoters of these four sites have proposed plans to remodel the junction of Fulling Mill Lane, Codicote Road and Link Road, in preparation for the additional traffic that would flow from them into the road network.

Currently in the morning rush hour (outside of lockdowns), traffic on the Link Road already queues back frequently from the A1(M) northbound junction along its entire length and for several hundred metres towards Codicote along Codicote Road. Most of this traffic is headed southwards along the Welwyn Bypass, whence it goes either into Welwyn Garden City or onto the southbound A1(M) - these routes too are frequently clogged up along their entire length. Inside the village, Church Street is usually clogged with traffic towards, and then along, the High Street.

There are already major housing developments underway in Codicote which, when complete, will add substantially to these traffic flows, and so worsen the problems. Likewise, additional housing developments are already planned in Stevenage and Knebworth, which will add considerably to the traffic flowing through Oaklands onto the Welwyn Bypass. There is no alternative route that can be opened up to alleviate these traffic flows. Codicote Road is sandwiched between the foot of the Danesbury hill and the river, and so cannot be widened. The Welwyn Bypass is similarly sandwiched between the A1(M) and existing housing.

Adding several hundred cars from Wel1/Wel2/Wel6/Wel15 into this already increasing traffic flow will hugely exacerbate these problems. It is inconceivable that it will be able to flow freely from Fulling Mill Lane into Link Road. The traffic will have to queue along Fulling Mill Lane and, realistically, traffic management measures such as traffic lights will be needed. Having a major road junction and queueing traffic on Fulling Mill Lane alongside Singlers Marsh would utterly change its rural character, as would the air pollution that these cars would generate.

Traffic from Wel1 might instead choose to exit the site via School Lane, which is essentially a single-track road with a single egress onto Welwyn High Street. Traffic already queues along the High Street in both directions at peak times, and additional traffic flows here will again exacerbate the problem. Also again, there are no alternative routes for these traffic flows to take through the village.

The third route that causes concern is westward on Kimpton Road. This route offers a shortcut towards the airport at Luton and to the M1 motorway, particularly for those starting from the area around Oakhill Drive - and hence for Wel1, Wel2, Wel6 and Wel15 as well. Current usage of this route is light and is manageable along the narrow roadwidth through the residential area and along the country lanes towards Wheathampstead. However, the possibility of widening these roads is very restricted, particularly in the residential area and alongside the river. At one point, just above the turn-off to the cemetery, Kimpton Road has a six metre drop on both sides, posing major problems for any road-widening activity. This all means that this route would swiftly become dangerous if traffic volumes increase.

No-one involved in the debate within the Welwyn community has found any solutions for how the road network can be improved to cope with these increased traffic flows, which would be disastrous for the local community and for businesses in the village, and also dangerous across the wider road network.

26. Are there any perceived infrastructure constraints that are incapable of resolution before the end of the plan period?

WPAG comment:

The challenges facing the road network that we outline above, particularly along the High Street, Link Road and Kimpton Road, appear insurmountable within the timeframe of the plan period.

Separately, there is no space available within the village centre to increase off-street parking capacity, so a substantial addition to the population of circa 700-800 people (assuming 250 extra homes) would not be serviceable by the local shops.

27. What is the nature of the alleged flood risk and is it incapable of resolution through mitigation?

WPAG comment:

As shown by the photographs above, Singlers Marsh is already prone to flooding. The current type of flooding already happens in most years. Less frequently, on the order of every 3-4 years, the river will overflow and cover the entirety of Singlers Marsh. These are the problems being encountered already.

It is well known that new housing developments readily increase water run-off. These four sites are all on higher ground than Singlers Marsh. The fact that the marsh hosts a river confirms that it lies at the bottom of the local drainage basin. Unless each of these sites can be guaranteed to not increase the rate of run-off onto the marsh at all, then they will definitely increase the flood risk.

It is hard to see what other mitigation can be created - the surrounding fields are used productively for arable farming and are also sloped, so would be unsuitable as a flood plain on both counts. Even if run-off water were permitted to be fed directly into the river (it is not), the only practical place from Wel1 would be into the river alongside Kimpton Road, but this is upstream of the marsh and so would not solve the problem at all. Without a major (and highly disruptive) investment in a large sewer out of these sites and indeed out beyond Welwyn, these sites are highly likely to increase the existing flood risk at Singlers Marsh.

These four sites pose a genuine flood risk. This is not a fabricated argument.

28. Are there any noise or air pollution issues affecting any or all of these sites that are incapable of resolution through mitigation?

WPAG comment:

It is obvious that this number of new homes will generate substantial amounts of general noise in a previously tranquil area, and that the large number of accompanying cars will add to that noise as well as generate air pollution as they drive/queue past Singlers Marsh.

Insofar as mitigation measures usually involve barriers to block sound or pollution, these would further damage the open vistas that connect Singlers Marsh to the open countryside around it.

29. Does the infrastructure evidence actually confirm that it is necessary to develop these sites as a complete whole and together?

WPAG comment:

Any resolution of the substantial infrastructure challenges outlined above will require high levels of investment, which we see as difficult to justify by any individual site on its own.

30. Is third party land involved in providing the off-site infrastructure and is agreement to use this legally secured?

WPAG comment:

WHBC currently owns Singlers Marsh. According to the information in the public domain, there is no legally secure agreement to provide the required part of Singlers Marsh for developing the road access infrastructure. We would be grateful for an update on this from WHBC.

As mentioned earlier, Singlers Marsh is the subject of a Village Green registration application. If successful, it would not be available for any development at all. Subject to a contrary legal opinion being obtained (which would likely be challenged), the inclusion of these sites in the Local Plan would not be sufficient to negate the Village Green application, thereby overruling any agreement to use the land that might be reached in the meantime.

Also as mentioned earlier, WHBC would gain financially from providing the land for an access road. It would not be unexpected if local residents were to formally challenge this apparent conflict of interest between WHBC's various obligations.

31. Has any formal consultation with North Hertfordshire District Council been undertaken? Particularly but not exclusively in the context of Site WEI6 and the adjoining land to its south-west?

WPAG comment:

We are not aware of anything in the public domain about this.

32. To what extent would it be feasible or practicable to bring these sites forward for development in a phased manner?

WPAG comment:

We have no opinion about the practicality of developing these individual sites in a phased manner. Regardless of how it were done, the infrastructure and environmental issues would still need to be fully addressed.

33. If developed, should a masterplan be prepared to ensure the comprehensive development of the area proposed for development?

WPAG comment:

We have no specific comment to make about this.

34. Could any of these sites clearly deliver dwellings within the first five years following adoption?

WPAG comment:

This would appear to be difficult to achieve. Clearly, there is the real possibility that Singlers Marsh will be registered as an official village green, or that WHBC decides to not sell the required piece of land to provide the road access to these sites. Either of these would stop the developments entirely.

If these events do not occur, even after relevant appeals processes have run their course, then there would need to be a full and detailed consultation regarding the use of Singlers Marsh land to provide access. Assuming this consultation process came to a conclusion that allowed the access road to be built, the planning approvals process would finally be able to start, but it is likely that the weight of objections from local residents would slow down the process. The sites would then need extensive preparation before building work can commence.

We therefore see no clear path that would allow these sites to deliver any finished dwellings at any of these four sites within the first five years following adoption.

35. Are there any other matters that weigh against any of these sites being proposed for residential development?

WPAG comment:

Our responses have been prepared primarily in regard of the issues pertaining to Singlers Marsh. There will be other matters raised by other respondents which will be worthy of inspection.

In broad terms, put simply: Welwyn village is already full. In the past fifteen years we have had multiple housing developments on brownfield sites approved via the normal planning process: Wilshere Park, Node Way Gardens, Clock House Gardens, Wendover Lodge, and others. Together, several hundred new homes have already been added to the village, bringing welcome new residents into our community. However, none of the village's infrastructure has been expanded to match this population growth:

- The road network within and around the village is now (outside of lockdown) congested, and it is impossible to expand due to the constraints of topography and existing housing.

- The primary school is now so full that it is unable to guarantee places to siblings of existing pupils.
- Available on-street parking has reduced over this time, through a combination of increased restrictions by HCC (despite opposition from residents groups) and some of the new housing developments not providing adequate off-street places - this has all added to congestion in the village centre.
- The off-street public parking areas are hemmed in by housing and cannot be expanded to meet extra demand; parking to use the local shops on the High Street has become increasingly difficult.
- Although the GP surgery has sufficient physical space to expand its services, it has struggled to expand its team due to well-known nationwide challenges with recruiting doctors. At the time of writing this document, it has been unable to replace two departures from its senior team - whereas there have previously been eight GP partners for well over twenty years, there are now only six.

Welwyn is struggling to cope with these previous increases in housing stock because the village's infrastructure has not been expanded to keep pace with this growth. The reason why the infrastructure has not been expanded is because it is not at all easy to do so. This same problem obviously applies to any future increases in housing numbers (bearing in mind that Welwyn already has new sites allocated in the proposed Local Plan).

It is not unreasonable to conclude this submission by stating that the addition of Wel1, Wel2, Wel6 and Wel15 would not only destroy Welwyn as a rural village and wreck one of the wider area's natural treasures, but would also truly overwhelm the village's infrastructure: shops, traffic, parking, schooling, healthcare.