

**Colin Haigh  
Head of Planning**Mr M Middleton  
c/o Programme OfficerReply to: address as below  
Date: 19 June 2020  
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Dear Sir,

**Council's response to Inspector's Note EX186C - Symondshyde**

Thank you for the opportunity to provide you with additional information about the Local Plan allocations SDS2 Birchall Garden Suburb - South East Welwyn Garden City and SDS6 Symondshyde New Village to respond to your concerns and reservations.

This letter responds to your questions and comments about the SDS6 Symondshyde proposal and I have sent you a separate letter concerning the Birchall Garden Suburb proposals. The letter is supplemented by five appendices which address the detail of the matters you raise including the potential to increase the size of the allocation, however you should note that the option of expanding the village has not been formally considered by Members. A sixth appendix lists the key pieces of evidence submitted as examination documents on Symondshyde.

**1. Reasons for proposing a new village**

Symondshyde is the only new settlement proposed in the local plan. The Council believe that the inclusion of a new village in the local plan is a beneficial element of the strategy. It sits alongside urban extensions and a range of smaller urban and rural housing sites to provide a range of delivery outlets overall. It is the Council's view that incorporating a new village in the supply mix significantly enhances choice available to developers and consumers. The Letwin Review into the delivery of homes included the key

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recommendation that there should be greater market choice and segmentation, something the Symondshyde proposal would do. To put this in context, if the Symondshyde proposal was replaced in the local plan by an urban extension this would increase the contribution from urban extensions to a dominant 60% of supply.

The proposal to create a separate new settlement here is in line with the overall ethos and objectives of the Green Belt, with its emphasis on constraining sprawl whilst retaining open land and the separate identity of settlements.

This particular location and proposal provides specific and strategic benefits which would not arise were it to be deleted in favour of an urban extension elsewhere. The village and its sister allocation, the North West Hatfield urban extension (SDS5) provide a mechanism which can deliver a key element of the Welwyn Hatfield Green Corridor (see figure 8 in the submitted Local Plan) including connections to the Ellenbrook Fields Country Park and to the Heartwood Forest near St Albans. This is because the two sites are owned and promoted by the same landowner. It allows complementary masterplanning and delivery of the two elements as part of a unified whole, including the green infrastructure joining the two development areas. The sites, when considered together, therefore could provide the best of both worlds for sustainability and planning purposes.

## **2. Alternative locations**

A key concern of yours was the availability of sites in sequentially preferable or more sustainable locations than Symondshyde.

As a preliminary point, the Council would take this opportunity to reaffirm that the local plan is being examined against the 2012 NPPF. Green belt policy within that document does not make a reference to a sequential approach to green belt release. I have appended (**Appendix 1** to this letter) a note from our Barrister which gives a clear legal opinion on this matter and I ask that you consider this advice.

Nevertheless, you will be aware that the Council has made significant and exhaustive efforts to improve the supply of previously developed, urban and other smaller sites which do not require Green Belt release. The recent sites consultation includes potential for almost 1,300 additional dwellings on specific sites which do not involve Green Belt release.

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The Council has re-examined the land mentioned in your note, between the A1057 St Albans Road and Green Lanes near Stanborough as a potentially preferable area. This area takes the form of an arc, extending around the north-western edge of Hatfield including the gap between the local plan sites SDS5 NW Hatfield and SDS6 Symondshyde. For the purposes of assessment the arc can be usefully considered as northern and southern sections each side of Coopers Green Lane.

- **Southern Section.**

Within the arc, the land south of Coopers Green Lane runs through the former Hatfield Aerodrome, now part of Ellenbrook Fields Country Park.

This is a large expanse of publicly accessible open space, which was provided as a result of a S106 agreement associated with development to the east. The importance of the country park as a primary green infrastructure asset was recognised in the Green Infrastructure Plan for Welwyn Hatfield 2011 (examination library reference **ENV/3**) (see for example paragraphs 2.12 and 4.6 of document **ENV/3**) alongside the Strategic Highlights Green Infrastructure Plan for the County (examination library reference **ENV/4**). Policy SP12 of the Draft Local Plan as submitted deals with Strategic Green Infrastructure and identifies Ellenbrook Country Park for future links to the Welwyn Hatfield Green Corridor. The Council therefore views this area as an important element of green infrastructure. Access to a range of open space is an important aspect of sustainable development - it is within the UN Sustainable Development Goals – and also highly relevant to the Garden Cities principles.

A large part of the country park has been promoted for residential development and is referred to as Hat2 in the SHLAA/HELAA. The Council assessed it as unsuitable for development and that its availability was uncertain because it could only come forward if a variation to the existing S.106 agreement were agreed to by all parties.

Further details concerning the availability of this site for development are set out in a jointly agreed statement with the promoters in the accompanying **Appendix 2**. If the development of Hat2 were to go ahead as currently proposed, approximately 19% of the country park land would be permanently lost.

The harm to the Green Belt of development on Hat2 site would be “moderate – high” for sub-parcel P46b (which relates to the planning application site area), “high” for sub-parcel P46a

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(which relates to the Hat2 HELAA site area) and 'very high' for the whole of the parcel P46 according to the LUC Green Belt report (examination library references **EX99C**).

Specifically, this area makes a significant contribution to maintaining the fragile gap between Hatfield and St Albans.

From a sustainable transport point of view, there are some advantages to this area compared with Symondshyde, but the Council does not consider these to be particularly strong. The next section in this letter, with its supporting Appendix 4 indicates that a high level of bus accessibility can be provided economically to Symondshyde. While the Ellenbrook Fields land is closer to Hatfield town centre and railway station than Symondshyde, Hat2 is still 2.5km and 3.5km respectively from those locations. This is significantly beyond the 800m walking distance recommended by the Chartered Institute of Highways and Transportation (CIHT) indicating that walking journeys from location into Hatfield remain highly unlikely. The Council has previously referred to 2.4km being a recommended cycle distance (University of Lancaster 2011, Understanding Walking and Cycling). It is accepted that Hat2 is only just outside this recommended distance and therefore there may be some advantage in cycle access but this does appear to be only a limited advantage over Symondshyde.

- **Northern Section**

This element of the arc overlaps slightly with Area D assessed in the section below "Symondshyde expansion options" and in the accompanying **Appendix 3**. In that assessment, the conclusion is reached that there is potential to introduce development here. However, the key difference is that the opportunity exists to expand Symondshyde eastwards towards Hatfield, retaining a 700m gap between the two, rather than to expand the NW Hatfield allocation further west as a replacement for Symondshyde.

It is also worth noting that the landowners, the Gascoyne Cecil Estate have not made land between Symondshyde and NW Hatfield available for development in that form. Instead they are supportive of the new village concept as promulgated in the submitted plan. This is confirmed on their behalf within Appendix 3, paragraph 4.23. This appears to rule out such an option for the foreseeable future.

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Land at the extreme northern end of the arc adjoining Green Lanes itself has a pronounced openness. This character is reflected in the area being considered part of the most essential Green Belt (examination reference **EX99D** figure 9.1).

The sustainability of transport access here would be little different from Symondshyde, since the areas adjoin and would need the same level of planning intervention to enhance bus services and other sustainable links.

### **3. Sustainable Access to Symondshyde**

WSP have been working with Hertfordshire County Council and the bus providers to detail a public transport strategy for Symondshyde. They have provided a report which the Council endorses to explain their proposals, **Appendix 4**.

They recommend that bus access can be provided by building on and supplementing the existing bus services which run to the east of the new village and which provide good links to key destinations like town centres, railway stations, business parks and locations in the wider area. (See their Figure 1 in Appendix 4 to this letter).

A Memorandum of Understanding between Gascoyne Cecil Estates and Hertfordshire County Council (examination library reference **EX184**) includes key agreements on the opportunities to deliver good levels of walking and cycling by providing day to day services on site, including in conjunction with the nearby NW Hatfield urban extension, and linked by high quality active travel infrastructure. There is further analysis which indicates the likely viability of local facilities in the next section of this letter.

The public transport strategy proposed by WSP would incorporate a bus only access to the village at the first housing completion, rerouting existing service 601 at a 30 minute frequency providing links to Welwyn Garden City, the main town in the borough. As the village develops, route 366 would be rerouted as well, providing additional links to Hatfield as well.

As an alternative approach, further work has been undertaken on the provision of a new “loop” bus service serving Symondshyde, NW Hatfield and both town centres at a 20 minute daytime frequency, to increase in frequency later in the development. WSP calculate that the service would require a cumulative subsidy of just under £1m from the first occupation until it becomes economically viable in around years 13 – 15 (see table 2.5 in the WSP

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paper at **Appendix 4**). This calculation is based on 1,500 dwellings at Symondshyde, rather than the 1130 proposed in the submitted plan.

#### 4. Viability of local facilities

The Council has carried out a comparative survey of new communities at a range of scales to assess the likely ongoing viability of local facilities at Symondshyde. The accompanying **Appendix 5** out the study in more detail. The study examined 18 new villages, including examples both completed and proposed. These ranged in size from 350 to 4000 dwellings. In general, the smaller settlements were complete, the larger ones planned.

The comparative assessment indicated the following scales of development necessary for each type of community facility (figures are rounded up to the nearest 100 dwellings):

- Primary School – 900
- Community Hall – 600
- General purpose (food) shop – 600
- Pub – 1100 (albeit just proposed rather than delivered at this stage)

Provision of a secondary school and GP surgery appear unlikely at Symondshyde. However, the Hertfordshire County Council, Gascoyne Cecil Estates have confirmed their support for the local plan provision of an eight to ten form entry secondary school at nearby North West Hatfield. Land at North West Hatfield is also being made available for a GP Surgery should an economic case for such a surgery exist. Sustainable transport links to North West Hatfield and beyond are proposed to be enhanced, emphasizing the linked and integrated nature of these allocations.

#### 5. Symondshyde Expansion Options

You suggested examining two locations for minor expansion of Symondshyde, both small areas to the north of the site. In addition, the northern section of your suggested western Hatfield arc (see section 2 above) includes land between Symondshyde and NW Hatfield. JB Planning, on behalf of the Gascoyne Cecil Estate, has examined the potential options to expand the new village. See **Appendix 3** to this letter. They assessed them against relevant local factors; landscape character, mineral extraction, ancient woodland, visual amenity, proximity to Hatfield, green gap, green belt and other issues. Expansion southward and westward has not been considered in detail because of the loss of ancient woodland

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that would entail. Figure 1 in the paper shows these areas, lettered A – E which should be read together with the site comments in tables 2 to 6. Their summaries state:

- Area A. This area would only make a limited contribution to housing numbers (possibly no more than 40 homes) due to the proximity of the ancient woodland and the narrowness of the area. It would not achieve the critical mass required or a compact settlement form.
- Area B. Not considered suitable for an enlargement to the allocated site due to the potential adverse effect on the adjacent woodland. The area would only make a limited contribution to the housing numbers (possibly no more than 100 homes). It would not achieve the critical mass required or a compact settlement form.
- Area C. Not considered suitable for an enlargement to the allocated site. Development would be visible from the wider landscape and closer to the historic parkland at Brocket Hall and would not provide for a compact settlement form.
- Area D. Considered suitable for an enlargement to the allocated site with few sensitivities. The gap between Symondshyde and Hatfield in this area should ideally be no less than 700m. Would provide for the creation of a compact settlement form.
- Area E. Considered suitable for an enlargement to the allocated site. Although there are sensitivities these are capable of mitigation. The area has a contained quality which would help to absorb the development. The gap between Symondshyde and Hatfield in this area should ideally be no less than 700m. Would achieve the critical mass to secure sustainable development and a compact settlement form.

The paper demonstrates that there are extension possibilities for Symondshyde to the west/south west (i.e. areas D and E in Appendix 3) to allow an additional 400 dwellings, should that be desired while maintaining a meaningful gap between Symondshyde and an extended Hatfield.

### **Possible Changes**

- The various sections above indicate that, while the current proposal for 1,130 dwellings is likely to be self-contained and sustainably accessible, an increase in scale could be beneficial in these respects. Should the Inspector consider the plan cannot be found sound without making provision for additional housing there is

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potential to expand the new village broadly in a south easterly direction to a size of 1,500 dwellings. With this, amendments to the infrastructure requirements would be appropriate as follows:

- Specific reference to providing a public house and/or restaurant
- Increasing the primary school to a three form entry school (630 pupils)
- Greater detail on the public transport requirements of the development

### Conclusion

The Council does not consider there are suitable or deliverable options to provide one or more urban extension to Hatfield between the A1057 and Green Lanes. The Council do not consider these to be more sustainable alternatives for the reasons set out above. They also have significant delivery issues. Should the Inspector consider that Symondshyde would be more sustainable as a larger proposal, and that the local plan cannot be found sound without such a change being made, there is the potential to expand it in a south-easterly direction and to provide additional detail and certainty over infrastructure provision including costed public transport enhancements.

No showstoppers have been identified to the delivery of Symondshyde, an extensive up to date evidence base exists and reasonable professional judgement has been used to assess its capacity. In addition to the evidence submitted at Regulation 19 stage **Appendix 6** to this letter lists the key pieces of evidence submitted as examination documents.

Yours faithfully



Sue Tiley

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## List of Associated Papers

- Appendix 1 Legal Opinion from Wayne Beglan
- Appendix 2 Welwyn Hatfield Borough Council “Statement concerning deliverability of site HAT2” and annex setting the promoters proposals for phasing of the site and green infrastructure.
- Appendix 3 JB Planning Associates “Symondshyde New Village, Options for Achieving Critical Mass and Sustainability”
- Appendix 4 WSP “Public Transport Strategy, Symondshyde New Village”
- Appendix 5 Welwyn Hatfield Borough Council “Symondshyde – Facilities and Settlement Size” plus Annex
- Appendix 6 List of evidence

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