



Wheathampstead Parish Council

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For the attention of Planning Policy,
Welwyn Hatfield Borough Council,
Council Offices,
The Campus,
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19th October 2016

Wheathampstead Parish Council— Welwyn Hatfield Draft Local Plan Consultation 2016

Wheathampstead Parish Council has a number of points to make in response to the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission.

1. Our Response to the Previous Consultation in January 2015

Wheathampstead Parish Council was consulted on the Welwyn Hatfield Local Plan Consultation in 2015. Our response indicated concern about the significant level of development proposed at that time located in Green Belt on the edge of Hatfield (HAT1 & HAT2: 2,450 houses). We also stated that we felt that the housing target of over 12,000 houses in the plan period was too high for the district, which is the smallest in Hertfordshire. We were particularly concerned about the risk of coalescence between St Albans, Hatfield and Wheathampstead caused by encroachment into the Green Belt in this location. We consider that the District Council has not responded reasonably in its current consultation to the concerns we identified at this time.

Although our response is on the broad Local Plan, we are particularly concerned with the proposal in this document to develop a stand-alone settlement at Symondshyde Farm (Policy SP24) and much of our response relates to this policy. The thoroughness of our response should be taken as an indication of our level of concern in relation to Policy 24.

The 'Broad Points of Response' below are made with specific reference to proposed Policy 24 in the draft Local Plan that we consider to be a cause for significant concern.

2. 'Early and Meaningful' Consultation

The proposal to develop a stand-alone settlement at Symondshyde Farm

did not feature in the original consultation (Local Plan Consultation—January 2015) and we consider that the council has not fulfilled the requirement NPPF (para 155) requirement for:

"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."

We consider that Welwyn Hatfield has failed to engage in early and through consultation in relation to this significant proposal. Although it has assessed the 'value' of the land in Green Belt terms its assessment has failed to recognise the special character and extensively used nature of this area and its intrinsic value in the eyes of local residents and those from other districts (NPPF para 123). Councils must:

"Identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."

This area is very well used by people from Welwyn Hatfield and St Albans Districts and from further afield. It is highly prized for its quiet rural nature, wildlife, footpaths and bridleways which are used by individuals, families and community groups. Access to the land is free and the physical and mental health benefits are available to all and widely used. The council has, we believe, failed to identify this aspect of this area of Green Belt, failed to promote and engage with people about its relatively recent plans for development at Symondshyde and failed to recognise the role of this land in "improving health, social and cultural wellbeing for all." (NPPF para 17)

Active promotion and consultation of this proposal by the council has been sparse, with the exception of this current consultation, which appears to be a 'signing off' exercise for a policy which has never previously been consulted upon, or featured in the historical evidence base as a possible site for development. There *has* been active promotion of the proposal by a campaign group, but their communication has been limited by short timescales and the late appearance of evidence behind this site proposal.

The council's interpretation of 'community' appears to have been limited to the residents of Welwyn Hatfield, without recognising that areas of land are extensively used and loved by people who may live near, but in, the district. We consider that the plan has failed to accurately understand the role of this area of Green Belt (NPPF 17):

"Planning should...take account of the different roles and character of different areas...protecting the Green Belts. Recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities."

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3. The Green Belt

3.1 Historical Documents in the Evidence Base

In the previous draft Local Plan Consultation document published in January 2015 Welwyn Hatfield Council stated that (CS3 Settlement Strategy page 23) that: "In villages and other rural areas that lie within the Green Belt, development would be restricted so as to be consistent with the type of development envisaged in the National Planning Policy Framework".

In addition, previous work that had been done on identifying land availability, including the SHLAA – Phase 2 (October 2012) had excluded tens of sites from possible housing or employment development because; development would undermine the Green Belt through coalescence, sites were poorly served by existing services and facilities were of an insufficient size to generate the capacity to provide the range of services needed and development and this would have an unacceptable impact on the local landscape. Following this assessment 52 Green Belt sites were thought to be unsuitable. The 140 acres of Green Belt land at Symondshyde did not even feature in this SHLAA as a large site in the heart of the Green Belt. The site was at odds with local and national policy and the sensitivity of this location is so high as to exclude it from consideration.

The site at Symondshyde did not appear as a potential location for housing in the 2012 SHLAA or the 2012 Landscape Sensitivity and Capacity Study. This area is important in maintaining the existing settlement pattern and preventing urban coalescence.

The area of Green Belt that includes 140 acres at Symondshyde was also looked at by a team of independent consultants (SKM) as part of a wide-ranging Green Belt review for Welwyn Hatfield, St Albans and Dacorum Borough Councils in 2013 (Green Belt Review Annex 1.3 Welwyn Hatfield Final). The area of land which has Symondshyde at its centre, called GB43A, was assessed against the five purposes of Green Belts set out in the NPPF. It was found to make a significant contribution towards preventing neighbouring towns from merging, a significant contribution towards maintaining the existing settlement pattern and a partially significant contribution towards safeguarding the countryside from encroachment.

However, Welwyn Hatfield's more recent Green Belt Review in June 2016, added a Green Belt assessment for the 140 acres of Symondshyde, effectively re-wrote this assessment. It downgraded the prevention of neighbouring towns from merging from 'partial' to 'limited/no' merging. It maintained the role of safeguarding the countryside as 'significant', but downgraded the previously 'significant' role of maintaining the settlement pattern to 'partial'. Downgrading the previous assessment is questionable.

We also have doubts about the assessment, which was completed in June

2016, just one month before the Cabinet Housing and Employment Panel recommendation to take this site forward for 1,130 houses. This information was not made available to the public as part of the evidence base until the consultation began.

It could be construed that this new Green Belt assessment of the land at Symondshyde may have been designed to facilitate a decision which is at odds with previous evidence and local and national policy. In addition this assessment, or the identification of the site as a possible location for housing, had not been in the public domain for long enough to allow sufficient awareness by this and neighbouring districts.

We are also concerned that Welwyn Hatfield Council has given a somewhat one-sided assessment of the value of this area of Green Belt land. The Landscape Sensitivity and Capacity Study (2012-15) described the site as having high sensitivity, high value and low landscape capacity for development. Yet in June 2016 in the Housing Site Selection Document the area was described as 'partially developed' (Housing Sites Selection Background Paper Appendices A-K Maps and Tables). Partial development in this instance just means one grade two listed farmhouse in a setting of broad Green Belt fields, part of the landscape and historic heritage of the area. This document also describes visual openness as 'low-mixed'. We consider this to be inaccurate. The land is a swathe of 140 acres of high quality, well used by people from within and beyond the district. Visual openness is a key factor in the attraction of this land and part of the reason why it is so well-loved and has both a high environmental and human value. In addition secluded aspects of the land, enclosed fields, woodlands and winding lanes also have high amenity value by those people drawn to the area for good physical and mental health.

3.2 Green Belt Boundary Containment

Containment of the site is a critical factor in any assessment and conclusions about whether it should be removed from the Green Belt (NPPF paras 83, 85)

"Green Belt boundaries should only be altered in exceptional circumstances...At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term...they should be capable of enduring beyond the plan period."

"When defining boundaries, local planning authorities should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

The site proposed for development at Symondshyde has no defining boundaries on any side with which to contain any future risk of expansion or coalescence. We consider that Welwyn Hatfield's assertion (in the Housing Sites Selection – Background Paper 2016, Appendices A-K, June 2016) that the boundary to the north-west is strong because it is ancient

woodland, is unrealistic. In fact only 12 acres at Hammonds Wood, out of around 150 acres of woodland is ancient and commercial woodland has no planning restrictions. Twenty years ago oak, ash and elm trees were felled and were replaced by softwoods; scots pine and European larch. Relatively young woodland used as a commercial crop is not a permanent feature, even if located in the area of a previously ancient wood.

Permanent features, likely to retrain settlement sprawl are major roads, railways and rivers. In the case of Symondshyde there are no permanent features likely to contain the risk of future sprawl. This is important because the 'gap' between the development at Symondshyde and housing at HAT1 (1,650 homes on Green Belt land directly adjoining Hatfield and contained within Coopers Green Lane) would be just 1km. We do not consider hedgerows or open fields to be permanent and defensible features.

In addition, the settlement strategy proposed for Symondshyde (proposed Policy SP3) excludes Symondshyde from the Green Belt entirely (Small excluded villages and settlement), creating a risk that, if built, development pressures within the village would not be contained by Green Belt restrictions, potentially resulting in increased density and pressure to expand the settlement further into the Green Belt. This proposal risks creating a boundary which is not capable of enduring beyond the plan period and which risks coalescing into Hatfield and St Albans.

We do not consider that the presence of the so-called 'Green Corridor' offers a permanent and separating feature between Symondshyde and Hatfield. In theory and in practice, if strongly protected Green Belt land can be re-classified for housing development in the past, it can also be in the future.

We consider, by way of an example, that the boundary containment offered by Coopers Green Lane in relation to proposals for housing in Green Belt site HAT1, does fit the NPPF intension of a permanent physical boundary that is unlikely to be altered in the future. However in this particular example the inclusion of a gypsy encampment on the other side of this boundary, risks creating a breach in an otherwise strong physical feature for urban containment.

3.3 Proving Exceptional Circumstances

"As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." (NPPF para 87)

"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan." (NPPF 83)

A housing need assessment alone should not identify this site as suitable.

The historic evidence, including the previously discussed SKM Green Belt assessment, until June 2016 has indicated that this broad location and this specific site are not suitable for removal from the Green Belt.

In addition, public responses to the last consultation indicated the very high value that local people place on the role of their local Green Belt in terms of quality of life, access to the countryside, preventing urban sprawl and providing leisure. The late inclusion of the site, the lack of assessments and publicity by the council have meant that the public have effectively had minimal consultation about this large scale proposal which will have a significant adverse impact on the Green Belt and will affect neighbouring authorities.

The site was only identified as a potential development site in June 2016, there has been no formal stakeholder consultation, excepting the current one, which began in August.

We are not aware of extensive public support either in our district (St Albans) or in the Welwyn Hatfield district for a stand-alone large settlement, particularly one in this location.

3.4 Cumulative Impact

In addition to the significant harm we development at Symondshyde will cause, we also have concerns about the impacts of existing and proposed quarrying activity which has the net effect of degrading a large area of Green Belt in this location.

Although mineral extraction is a permitted form of development in the Green Belt, the scale of existing and proposed future development will have a detrimental impact.

There is a large existing quarry between St Albans and Hatfield. Welwyn Hatfield has also identified the HAT2 location for mineral extraction in this plan period and a further proposed quarry between Hatfield and Smallford. It has confirmed that minerals would be extracted at HAT1 prior to any housing development. In relation to Symondshyde the housing document HELAA (June 2016 Rural North) states on minerals: *"Southern part of the site overlaps with existing minerals permission; need to consider approved working and restoration scheme. Opportunity for extraction prior to development on remainder. Need to consider cumulative impacts of extraction from HAT1, HAT2, HAT15 sites."*

On this basis we consider that the development at Symondshyde does open up the opportunity for mineral extraction before construction. We are very concerned about the cumulative impact of mineral extraction and housing development in this area, particularly as it risks degrading the Green Belt and increasing the risk of coalescence between Hatfield and St Albans.

3.5 Urban Coalescence

This area of Green Belt has been found (First Green Belt Review—SKM Consultants) to make a significant contribution towards preventing neighbouring towns from merging, a significant contribution towards maintaining the existing settlement pattern and a partially significant contribution towards safeguarding the countryside from encroachment. We consider that the collective impact of housing development at HAT1 and HAT15, alongside the existing and proposed plans for mineral extraction will significantly weaken this vulnerable area of Green Belt, degrading the land and will inevitably result in urban coalescence in the medium term (10-20 years).

Finally on the question of Green Belt we believe that this proposal (Policy 24) is at odds with the council's own proposed policy, which states that: "Development...which cannot be supported by the necessary infrastructure will be resisted."

4. Sustainability

4.1 Road Network and Public Transport

We consider that development at Symondshyde. The surrounding road network is predominantly rural and could not support the volume of car traffic that development in this location would inevitably generate. Heavy car usage is associated with rural settlements, and the presence of pedestrian and cycling links will not, in our experience as a village community, reduce car usage. We also find that the maintenance of existing community transport initiatives becomes more difficult each year as more bus services are reduced or cut completely. Even if services were put in place as part of a CIL/S106 contribution, in the long term and from experience, we do not think that commercial transport services find this location viable and it would be left without any effective public transport.

The burden on the existing road network is already high. The B653 (Brocket Road) is a stream of traffic in both directions at peak times. The difficult junction at Green Lanes, Brocket Road and Lemsford Road is an accident black spot with a long history of bad road traffic collisions. Other minor roads, including Tower Hill Lane, Coleman Green Lane, Hammonds Lane and Symondshyde Lane are very narrow, winding, single-track lanes. Access to the site is extremely limited and we consider that the prospects for the construction of "new access roads" and "wider strategic and local highway mitigation measures" are unlikely to be affordable or capable of being realised by Hertfordshire County Council, NPPF (para 177) "It is equally important to ensure that there is a reasonable prospect that planning infrastructure is deliverable in a timely fashion". We doubt that the proposed road network infrastructure in relation to Symondshyde can be delivered.

Hertfordshire has one of the worst rural accident records for death and serious injury in the country and the quality and safety of the existing road network is already a cause for concern.

We consider that these aspects of the proposal are at odds with the NPPF:

"Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised the use of sustainable transport modes can be maximised."
(NPPF para 34)

"Local planning authorities should...support a pattern of development which, where reasonable to do so, facilitates sustainable modes of transport." (NPPF para 30)

"To support the move to a low carbon future, local planning authorities should plan for new development in locations which reduce greenhouse gas emissions." (NPPF para 95)

4.2 Retail, Leisure and Community

The presence of a primary school would attract families and again we feel that the limited facilities available in a stand-alone settlement would create extensive car usage necessary to access sports, leisure, health and community facilities. Again in our experience, maintaining community facilities for very small communities is very hard to sustain in the long term. While facilities might be provided as part of a developer package in the long term, unless there is critical mass of population to use and pay for upkeep either through precept or direct payment, these facilities can degrade and quite become unviable.

A similar point applies to community shops. Village shops often have a precarious existence. Retail in Wheathampstead village survives because it is a thoroughfare between St Albans, Harpenden, Hatfield and Luton. It is a busy village with a lot of traffic and potential for smaller retail units to survive. In our experience retail provision in an 'out of the way' location without sufficient population to sustain it, is unlikely to survive.

In addition, we are concerned that locating houses in this relatively isolated location will result in reliance on car usage and further increase parking pressures in St Albans, Hatfield, Welwyn Garden City and Harpenden town centres as people try to access retail, community, leisure and entertainment facilities as well as trains into London.

5. Protecting the Natural and Historic Environment

5.1 Environmental Harm

The land at Symondshyde, including the woods are an area of great biodiversity based in areas of botanically rich remnant acid rich heathland, remnant ancient woodland, coppiced woodland and ancient hedgerows. Historic coppicing has result in high species diversity and there is a wide range of woodland and edge habitats which mean that this is a important area for rare plants, butterflies and insects. The proposals for Symondshyde are at odds with NPPF requirements to "protecting and enhancing valued landscapes" (para 109). Development

will result in the woodland fridges and the woodlands themselves being destroyed by the impact of the construction of a 140 acre settlement and will, we consider, result in an overall decline in biodiversity in this high grade ecological network.

Land at Symondshyde is of "high environmental value" (para 111). We consider that Welwyn Hatfield council has failed to assess and report upon the very distinct environmental value that this land has and failed to give this value sufficient weight in their assessment of it as a suitable site for housing development, NPPF (para 123):

"Planning policies...should...identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."

There has been no assessment of the existing ecosystem in Symondshyde Ridge/Symondshyde Wood area and no up to date audit of plant, insect and animal ecology. We consider the sustainability assessment carried out for the area to be hurriedly produced and woefully inadequate for an area of this importance and public interest. Reliance on Landscape Character Assessments carried out by Hertfordshire County Council (Symondshyde Ridge Area 32) over ten years ago is inadequate and we can see no evidence of input into an up to date and objective assessment of the ecological or amenity value of this area. NPPF (para 171):

"Landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity."

We do not consider that the creation of a 'Green Corridor' is an appropriate consultation for the loss of habitat and bio-diversity and that development at Symondshyde will result in significant immediate and long term environmental harm.

6. Summary

Wheathampstead Parish Council considers that this plan is unsound, specifically in relation to Policy 24.

Positively prepared—it proposes development which is unsustainable, inconsistent with existing local and national policies and will cause significant harm to the Green Belt.

Justified—this proposal is hurried, lacks appropriate engagement and wider public support the evidence base behind this particular site is insufficiently robust.

Effective—this development cannot be delivered effectively. A key element of its viability is reliant on the county council construction a specific road network to access this isolated settlement as well as enhancements to the existing rural road network. We believe that this

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unlikely to be a priority for a hard pressed county council and unlikely to be realised at the time of construction or ever.

Consistent with national policy—there are a number of areas where this proposal is at odds with local and national policy, but the most significant areas are Sustainability and Green Belt policies. These are key policies in the NPPF and this proposal appears very clearly to run counter to those planning principles.

We wish for this policy to be removed from the draft Local Plan. We would like to take part and speak at the examination hearing as we consider it appropriate that we represent the Parish of Wheathampstead fully in this matter.

We would like to be notified when the Local Plan has been submitted for independent examination and when the Inspector's Report is published.

This report is submitted on behalf of Wheathampstead residents by Wheathampstead Parish Council. Thank you for your consideration of our comments.

Wheathampstead Parish Council

