

Draft Local Plan Proposed Submission Document

Event Name	Draft Local Plan Proposed Submission Document
Comment by	Save Symondshyde Group (Mr John Gardner)
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Consultation Point	Policy SP 24 New Village at Symondshyde - SDS6 (Hat15) (View)
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Do you consider the draft Local Plan is legally compliant? No

If no, is this because it is NOT: (see guidance notes for respondents)

- . Prepared in accordance with the Local Development Scheme
- . Prepared in accordance with the Statement of Community Involvement
- . Compliant with the Duty to Co-operate
- . Accompanied by a compliant Sustainability Appraisal

Please give details of why you consider the draft Local Plan is not legally compliant. Please be as precise as possible. (Attach supporting documents if necessary).

Duty to Co-operate

There has been a failure in the Duty to cooperate both with other local councils and with Herts County Council and the Highways agency.

please see the unaddressed issues regarding transport and minerals, and the St Albans District Council response.

Statement of Community Involvement

We have received numerous complaints about the difficulties in finding information within the document, the web portal and the submission process (including that there is a non-publicised 10Mb uplad limit on emailed submissions). This is the first and only consultation for Symondshyde (SDS6) and despite the late entry very limited publicity.

The only local consultation event was held during the school holidays - despite requests in the CHPP to hold it later. This was refused because of non-availability - the developers managed to find dates both in Lemsford and Hatfield Garden Village.

It is possible the consultation hit the bare legal minimum - but clearly fails the Statement of Community Involvement.

Sustainability and Local Development Plan

please see below - this is neither a sustainable proposal or in accordance with National Policy.

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Do you consider the Local Plan is sound? No

If no, is this because it is NOT: (see guidance notes for respondents)

- . Justified
- . Consistent with national policy

Please give details of why you consider the draft Local Plan is either sound or unsound. Please be as precise as possible. (Attach supporting documents if necessary).

Detailed statement :

We object to the allocation of this 56 hectare site at Symondshyde for the development of a new village for the reasons given in our comments on Policies SP2 and SP3.

We have the following comments on the provisions of Policy SP24.

Planning the development comprehensively on the basis set out in the Local Plan and in the documents issued by the promoters, Gascoyne Cecil Estates will not create a sustainable community. The site is isolated from all surrounding urban areas, and currently has very little or no provision of water and sewerage, surface water drainage, electricity and gas or telecommunications services. A 'village' of around 1,130 dwellings would essentially be a dormitory settlement, almost entirely dependent on the surrounding towns of Hatfield, Welwyn Garden City and St Albans for its commuting, shopping, education, health and leisure facilities.

Dealing with the specific provisions of Policy SP24:

Education

The proposed two form of entry primary school to be provided on the site is intended to meet the needs arising from 1,130 new homes. Those homes would be built over a period of years, which means that the critical mass necessary to justify the new school would not be reached for some time. In the short term, children from Symondshyde village would have to travel to schools in the surrounding areas. Conversely, if a shortage of primary school places in the education planning area led to a new school being built at Symondshyde before the full local need arose, some children from the surrounding areas would be forced to travel to Symondshyde. This is hardly sustainable.

For secondary education, it is proposed that a new secondary school to be provided in the new North West Hatfield (SDS5) neighbourhood would cater for children from the new Symondshyde development. Again, it would take several years from the start of construction for the critical level of need to be reached. Even if such a school were to be built, the two settlements would be at least a kilometre apart at their nearest points, separated by open land and roads in the form of Coopers Green Lane and Great Braitch Lane that are unsuitable for children to walk or cycle along. They would have to be bussed or driven to school, which completely negates and even reverses the sustainability advantages claimed in the Sustainability Appraisal. Parental choice in the selection of schools over a wide area means that complex patterns of travel to school would develop, making a new settlement at Symondshyde even more unsustainable.

Retail – proposed neighbourhood centre and community facilities

The presence of a primary school would attract families and again we feel that the limited facilities available in a stand-alone settlement would result in a high level of car usage necessary to access sports, leisure, health and community facilities. The viability of community facilities for small settlements is hard to sustain in the long term. Although facilities might be provided in the first instance 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, the cost of maintenance is likely to be unsustainable

and the size of the population means that facilities are unlikely to be subsidised in the long term from the Borough Council precept.

A similar point applies to the one community shop and pub. Symondshyde will remain an 'out of the way' location, which even with the new roads proposed are unlikely to attract the critical mass of customers needed to be viable.

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.

Transport – highways

Policy SP24 calls for suitable vehicular access to the site and any necessary wider strategic and local highway mitigation measures to be provided. It is suggested that new access roads from the site to Coopers Green Lane and Green Lanes would be constructed. New access roads would indeed be required, but the knock-on effects of disgorging traffic from a new settlement at Symondshyde onto the local road network would be significant. This would be exacerbated by the proposed new neighbourhood at North West Hatfield, only a kilometre away, which will generate even more traffic on the same roads.

These knock-on effects would extend to the wider highway network. Access to the A1(M) is from Junction 4 at Stanborough or Junction 3 at Roehyde. Both are difficult to reach from Symondshyde. Access to Junction 4 involves travelling east along Coopers Green Lane and then through a series of roundabouts onto the A1(M). Access to Junction 3 involves travelling south to the A1001 at Birchwood and thence through two major roundabout junctions with the A1057 and A414 respectively to reach the A1(M).

Part of the Welwyn Hatfield Evidence Base includes assessment of the current road infrastructure in the district: WHaSH (Welwyn/Hatfield and Stevenage/Hitchin) Highway Model - Model Forecasting Report. This report indicates on pages 33 the junction delays in areas of Welwyn/Hatfield that would be generated if the then (2015) proposed development took place. Welwyn Hatfield councillors and officers have stated that the proposal to develop land at Symondshyde has effectively replaced the HAT2 proposal, however the highways impacts are likely to be the same or worse, given that HAT2 was an urban extension whereas HAT15 is an isolated settlement, and likely therefore to generate a higher level of car usage.

The report stated then that: "It is noted that the greatest forecast delay is to the west of the model area along B653 Marford Road. This is discussed in more detail in Table 5.2, in section 5.4, but it is noted that this is a model loading point issue and background growth is resulting in the link becoming oversaturated in the forecast year."

Figure 5.2 indicates very clearly the burden development in this location will place upon the existing road network, particularly in the B653 which will experience the highest delay in the district. It is important to note that this route effectively connects two M1 (Luton/Harpenden) junctions to two A1 junctions (Welwyn/Hatfield), is heavily used and forms part of the key east-west roads infrastructure of Hertfordshire.

Just two relatively minor transport infrastructure schemes are proposed in for the B653 Marford Road feeder into Hatfield. This is in an area which will be impacted collectively by 3,780 (HAT1, HAT15 Welwyn/Hatfield Local Plan & Oaklands St Albans Local Plan) new houses.

Even with the mitigation schemes proposed, traffic volume capacity will be over 90% (Figure 13) on the B653 and Coopers Green Lane in the morning as traffic travels towards Hatfield/A1/M and will also be over 90% (Figure 14) in the evening as transport leaves Hatfield/A1/M). This very high volume of traffic will effectively bring traffic to a standstill on the major transport link between the A1/M1 and settlements at peak times. It will have an adverse impact upon Wheathampstead village, an issue that has not been identified or discussed with St Albans District/Wheathampstead Parish Council or mitigated for. There is no evidence that the network capacity/volume modelled has taken into account the housing development planned in St Albans at the Oaklands site (1000 houses), a development that will have a knock on effect on Coopers Green Lane and the wider road network.

These transport bottlenecks and high traffic volumes have long existed on the B653 and associated junctions at Wheathampstead bypass, Green Lanes, Lemsford Lane, Coopers Green Lane Roundabout

and Stanborough Roundabout. They were identified, and costed mitigation was planned by Hertfordshire County Council in 2009 very clearly shows them to be part of a historic transport infrastructure deficit, i.e. an existing problem in 2009.

Since we are now in 2016 and car usage has increased, it is reasonable to assume that while the measures planned now by Welwyn Hatfield may mitigate the current problems experienced at these junctions. Evidence in the form of the WaHSH modelling shows it is not sufficient to mitigate the significant impact that housing development in this location will have on the B653 and Coopers Green Lane as well as the 'knock-on' effect for neighbouring settlements such as St Albans and Wheathampstead.

In terms of the plans for Symondshyde, which are described in Policy SP24 as: "Suitable vehicular access arrangements, which may require one or more access roads from the site at Coopers Green Lane and Green Lanes, including measures to address impacts on Hammonds Lane (Symondshyde Lane), Coopers Green Lane, and locations around Stanborough and Junction 4 of the A1(M)."

But there is no detail, no modelling and no detailed costing of what these measures are, and how they will impact the existing road network. A broad figure for infrastructure costs in relation to HAT15 is identified but there is no detail as to whether this figure is sufficient, the only *known* information is how much the existing road network schemes at Coopers Green Lane and Stanborough Roundabouts will cost. It is unlikely that Herts County Council will even allocate funding for a settlement or for any associated new mitigation for a project which is so unsustainable and for enhancements that would be better spent on improvements to the strategic road network.

The creation of new roads in the Green Belt also increases the risk of further segmenting Green Belt land, creating opportunities for urban expansion into the new 'land segments' created by new roads.

The volume of traffic passing through Lemsford Village is already high and access through the village uses a grade II listed bridge to access the A1(M) at J5 as well as the most direct route to Welwyn Garden City station. A significant increase in traffic would irreparably damage the bridge. This was one of the reasons for a previous successful campaign to reduce the access to and from the A1M.

Policy 173 of the NPPF states that: "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."

Transport – The Strategic Picture

It is surprising that Welwyn Hatfield have only included an arguably 'out of date' analysis of Hertfordshire's transport infrastructure needs (Hertfordshire Infrastructure and Investment Strategy 2009) in the Local Plan evidence base.

A thorough and more up to date assessment of local infrastructure needs, is contained in **Hertfordshire County Council's Transport Vision for Hertfordshire to 2050 – Technical Report (2015)** which looks at a which pattern of development for Hertfordshire is most likely to be economically effective and to result in an increase in public transport usage. It says (para 7.9) that in relation to dispersed patterns of settlement for new housing that there are three approaches, each having a different impact on sustainable transport infrastructure:

Dispersed pattern of development – where "Housing growth would take place on available brownfield and town centre plots first, but this scenario would also require edge of town brownfield, greenfield and some satellite developments to achieve the additional capacity required."

"The dispersed development scenario would result in fairly evenly distributed growth, and Hertfordshire would continue to look similar to the Hertfordshire of today. Distributed growth means that Hertfordshire's urban areas do not grow to city-size, nor do they densify into larger urban settlements, making public transport or sustainable travel solutions less viable."

"This form of spatial development is best served by car-based transport, as complex origin as destination patterns of travel continue. The schemes identified within this scenario therefore reflect the need for greater capacity on Hertfordshire's major transport routes in the long term."

It concludes that dispersed development: "Represents less sustainable form of growth, best served by car-based transport, with associated air quality impacts."

Symondshyde is part of a pattern of development that Welwyn Hatfield have put forward to 'disperse' or spread housing growth among existing settlements as well as some large urban extensions but also a satellite development (which is Symondshyde). It is very clear that a dispersed pattern puts more strain on the existing road structure, but urban extensions by comparison:

Urban extensions and densification – where “Urban extensions would mean large-scale extensions to existing Hertfordshire towns (for example, a doubling of the size of Stevenage), as well as significant densification of Hertfordshire’s larger towns such as Stevenage, Hemel Hempstead, Watford, Welwyn Garden City and Hatfield, making those towns feel more ‘citylike’ in nature. This development scenario clearly has some disadvantages in that it does involve some fundamental change to the look and feel of some of Hertfordshire’s urban places, and would require a very robust approach to planning and implementation. The advantage, however, would be that more innovative, density-dependent transport solutions would be more effective under this scenario.”

“Public transport and sustainable travel options are more viable under this development scenario, and much of the capacity requirements could be met by public transport investment. Developing a number of Hertfordshire’s existing towns into much larger settlements would mean that the travel patterns throughout the county were less complex, and public transport options would be more relevant.”

The Transport Vision for Hertfordshire also looked at another approach to settlement planning, creating ‘new settlements’. This involves creating large new large settlements: “one or two large new settlements could accommodate all of Hertfordshire’s required housing growth in the long term, without a need for urban extensions or fundamental changes to how Hertfordshire’s existing towns and settlements look at present.”

Taking this approach would create the: “Opportunity for innovative solutions through starting afresh; opportunity to plan for sustainable forms of travel in advance of development.”

It is important to note that the proposals for Symondshyde do not fall into this ‘new settlement’ category. The scale of the development at Symondshyde, its relatively hard to reach location, poor existing road infrastructure and proximity to Hatfield, put it firmly in the into the first (dispersed) pattern of development.

Given the very clear guidance from Hertfordshire County Council on which approaches to development cause most problems to the transport infrastructure, Welwyn Hatfield has a chosen to adopt an approach in relation to Symondshyde which will cause significant harm to a strategically important road network (east to west A1 to M1), and which in consequence will harm businesses in the district and the quality of life of its residents.

Public transport

Currently there is no public transport to and from the site or in the vicinity. In the longer term, there is very little prospect of regular bus services being provided to and from the site.

Policy SP1, third bullet point states that “ *the location of new development should deliver a sustainable pattern of development which minimises the need to travel by directing growth to those areas with good transport networks* ”. Clearly, Policy SP24 is in conflict with Policy SP1 in this respect.

There are two local buses that come within half a mile of Symondshyde (the 366 and 610), they both typically run hourly Monday through Friday. There is no ‘through’ route planned for Symondshyde and bus companies will not amend or extend routes that are not financially viable. On the contrary, throughout the county bus operators have been cutting services that they consider to be less financially viable, even school buses which are partly subsidised by Hertfordshire County Council. Hertfordshire County Council has been withdrawing bus subsidies over the past few years and operators have no choice but to cut services on routes and to locations that are not financially viable.

Pedestrian and cycling links

Policy SP24 refers to the provision of sustainable transport measures including the improvement of pedestrian links and cycle paths.

The only ‘pedestrian links’ to Symondshyde are public footpaths and bridleways. These routes have an unmade surface, unlit and are rural. They are part of the rural aesthetic of the area that makes it an attractive place for walkers, cyclists, horse riders and families. Creating tarmac, lit paths connecting Symondsdyde to Hatfield is the only viable option for creating useable ‘pedestrian links’. But by their very nature they would form an urbanising feature in the Green Belt that would separate Symondshyde

and Hatfield. This urbanising aspect would further undermine the narrow section of Green Belt between the two areas and add to the risk of long term coalescence.

Any pedestrian links between Symondshyde and Hatfield would require crossing Coopers Green Lane. This is a fast 60mph speed limit road which effectively forms a 'rat run' between Hatfield and St Albans. The road surface has been improved recently making drivers more confident about travelling at speed. There are no footways along either side of the road, and it is unlit. There is no safe location for pedestrians, including school age children to cross Coopers Green Lane and it is unlikely that parents or Hertfordshire County Council would consider this to be a 'safe route to school'. Given this a high degree of car usage to access secondary schools or for the children from Hatfield to access Symondshyde Primary School would be expected.

Development Viability

The NPPF places a clear emphasis on ensuring the viability and deliverability of a Local Plan (paragraph 173). WHBC commissioned BNP Paribas to assess the viability of HAT15 (Symondshyde). This study is available in their Evidence Base within the following document:

'Welwyn Hatfield Borough Council – Combined Policy Viability Study, Strategic sites testing' dated June 2016 (<http://www.welhat.gov.uk/CHttpHandler.ashx?id=11443>)

The report uses a typical Residual Land Value (RLV) model for assessing viability which includes a number of flawed or dubious assumptions.

The conclusion of the report states that HAT15 is viable as the Residual Land Value (RLV) exceeds the Benchmark Land Values (BLV) used in the report. This in itself is an acceptable statement; however we believe that both the RLV and BLV calculations are flawed.

Benchmark Land Values

Whilst the BLVs used (£250,000 - £370,000 per gross hectare for greenfield sites) are well known and have been used often, they are now somewhat dated (commissioned in 2008 by DCLG). Given that HAT15 is in a very prosperous area and that Land Registry data indicates that property values in Hertfordshire have increased by 23% in the last two years alone (cited in the WHBC / BNP Paribas report) we consider that the BLV thresholds used are much too low.

An extract from 'Cumulative Impacts of Regulations on House Builders and Landowners' published by DCLG in June 2011 states "...we would recommend that minimum land value requirements of at least £200,000 per gross, and £400,000 per net, acre are assumed for release of 'greenfield' land." The gross figure of £200k per acre equates to £494,000 per hectare. The net figure equates to £988,000 per hectare. It is worth noting that gross figures have been used by BNP Paribas. But as the net site area for HAT15 is relatively high at 74% (42 ha) it would be reasonable to base calculations on net figures and gross up to compare with BNP Paribas' calculations. The total net land value is 42 x £988,000 (£41.496m) scaling this figure back to gross values would result in a gross land value of £734,442 per gross hectare (£41.496m ÷ 56.5).

It is recognised that a figure of £734,422 is probably unrealistic, but the principle clearly illustrates that the BLV range of £250k - £370k is far too low. A BLV between £494,000 and £734,422 would be more appropriate. The mid-point is £614,000, but for the purposes of this comparison, a more conservative estimate of £550,000 will be used for the Benchmark Land Value.

Residual Land Values

A Residual Land Value has been calculated by BNP Paribas for HAT15 and several assumptions appear sound (eg. profit, SDLT) other assumptions are less than sound.

An allowance for 'site specific infrastructure' of £8m has been made (table 3.6.1) but the report is not clear what it includes. WHBC have clarified that it includes off-site road improvements, cycle & pedestrian routes and bus services. It is felt that £8m may be too low to cover all the off-site infrastructure; which will include two new access roads, major upgrading of Coopers Green Lane and Symondshyde Lane, footpaths, lighting etc...

In addition, an allowance of 15% of base build costs has been made for on-site roads and footpaths etc. Taking into account the proposed mix of flats and houses and using BNP's figures for 2016 Q2, this equates to £18.7m.

There are a number of accepted methods to estimate infrastructure costs, most notably from 'Viability Testing Local Plans' (Local Housing Delivery Group, Chaired by Sir John Harman) which suggests that these costs may fall in the range of £17,000 - £23,000 per plot. There at least 1,130 plots proposed for HAT15. Using the mid-value of £20,000 would indicate that an allowance for infrastructure of £22.6m would be more appropriate. The Harman report was published in 2012, the BICS All-in Tender Price Index indicates that build costs have since increased by 17.5% to 2016 Q3. This would result in a mid-range 'Harman' cost for infrastructure of £26.5m.

The above indicates that BNP Paribas' allowances for on-site infrastructure of £18.7m and external infrastructure of £8m are too low.

If the lower figure of £26.5m is used for on-site infrastructure, this will apportion to an additional infrastructure charge of £138,053 per gross hectare (ie. $(£26.5m - £18.7m) \div 56.5 \text{ ha}$).

The additional £138,053 charge would lower BNP Paribas' RLV figures by the same amount to approximately £282k, £317k and £347k for affordable housing targets of 35%, 30% and 25% respectively. These figures don't take into account any underestimate for external works (every £1m underestimated in the £8m estimate would result in an additional £17.7k reduction to RLV).

Local Plan Policy SP7 sets an affordable housing delivery target of 30% for Symondshyde. The BNP Paribas report states that HAT15 would be viable at this level, because the RLV (£455k) exceeds the upper BLV (£370k). This would not be the case if the adjusted RLV (£317k) and BLV (£550k) figures were used – the development would certainly be **unviable** as the RLV is substantially lower than the BLV.

In addition, no allowance for sinkholes which are believed to exist, geological surveys or archaeological finds (there was a great deal of Roman activity around Welwyn, St Albans and surrounding areas) have been made.

It is recognised that appraisals using Benchmark Land Values and Residual Land Values are based on many assumptions, indeed WHBC have confirmed that their costings are estimates and will be 'refined' as the plan progresses – almost certainly upwards. However, the above illustrates that the viability of HAT15 can easily be undermined when less optimistic values are used.

Ecology, wildlife and woodland

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 an 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 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."

Strategic green infrastructure corridor

Policy SP24 refers to spaces (in or adjacent to the proposed development site) contributing to wider ecological networks including a strategic green infrastructure corridor from St Albans through to Hertford. We assume that this is a reference to the Welwyn Hatfield Green Corridor introduced in Policy SP12 and shown in Figure 8. The indicative diagram in Figure 8 shows the green corridor passing alongside the Symondshyde site (along the line of Hammonds Lane) and into the site.

Paragraph 12.32, referring to the proposed Green Corridor, states that an evidence gathering process has been used to produce a stage one report which is to be developed into a Supplementary Planning Document identifying key projects to be implemented within the corridor and arrangements for long term management. While we have no objection in principle to the provision of 'green corridors' linking critical ecological and environmental assets, we have reservations about the wholesale 'gentrification' of the countryside in this way. We see no need for such a corridor running through or alongside the proposed Symondshyde site.

Heritage assets

Draft Local Plan Policy SP11 states that "... The protection, enhancement and management of the environmental, ecological and historic assets within the borough, will be sought commensurate with their status, significance and international, national and/or local importance...."

Symondshyde farmhouse is a designated heritage asset of National Importance and should therefore be protected and enhanced. The setting of such assets is clearly seen under National Planning law and Guidance as important and section 66 of the Planning (listed buildings and conservation areas) Act 1990 strongly requires that their setting should not be harmed. The Justification to SP11 states: "12.2 The borough's most valuable environmental, ecological and historic assets include its functioning ecological networks, networks of green and blue infrastructure, landscapes, listed buildings, historic parks and gardens, Urban Open Land, and other assets of importance including general environmental amenities such as a good air quality and rights of way. The Council is committed to protecting and where possible enhancing these assets as they make an important contribution to the local character and distinctiveness of the area, quality of life and the richness of biodiversity within the borough."

Clearly in this case the Council are not protecting or enhancing this asset and are not doing so "by directing development to those areas of least value and significance" and the statement in the specific policy SADM 24 is a hollow one, because the proposed site for the development would be centred on the listed farmhouse and completely surround it. The setting of an historic farmhouse depends on any of the historic farmstead buildings that remain (in this case very little) and also the farmland that surrounds it and has historically done so for hundreds of years.

Given that the listed building would be at the centre of the proposed development, adequate setting could hardly be retained without expanding the proposed settlement far beyond the area designated and thus also impacting even more heavily on the openness of the green belt.

Draft Local Plan Policy SADM 15 states amongst other things that

"Proposals should respect the character, appearance and setting of the asset and historic environment in terms of design, scale, materials and impact on key views."

And "Permission for proposals that result in substantial harm to the significance of a designated heritage asset, including Conservation Areas, will be exceptional or wholly exceptional in accordance with national policy and guidance."

If the farmhouse were to be surrounded by a housing development, it could no longer function in the future for its originally intended purpose or indeed its current "quasi-agricultural" equestrian purpose, where its function and relationship with its setting are very similar.

Local Geology

Sinkholes

A member of the public has reported to us that there are eight sink holes in the area 300 metres north west of the proposed Symondshyde development site. We are seeking expert advice from Imperial College, London on whether there are likely to be sink holes in the area of the development site.

Preliminary advice is that both the geology of the area and the terrain are consistent with the potential formation of sink holes. A quantitative assessment of the risk of sink hole formations as a result of the changes in groundwater regime that result from a development of the type envisaged is required.

We consider that the proposed allocation of the Symondshyde site for development should be put on hold until an authoritative investigation into this matter can be carried out. We would be pleased to pass on to the Council and the Inspector the results of the preliminary investigations that Imperial College are now doing as soon as we receive them

Mineral Extraction

Welwyn Hatfield Council is required to take mineral extraction considerations into account in Local Plan development. The Draft Local Plan 2016 states in paragraph 2.48 that:

The Hertfordshire Minerals Local Plan 2002-2016 (adopted in 2007) allocates land at Hatfield Aerodrome as a Preferred Area for future mineral working.

Policy 5 of that plan sets out the approach to minerals sterilisation. These proposals have been taken into account in the selection of sites and the drafting of policies for the Strategic Development Sites in this plan.

The Council has not taken minerals considerations into account in deciding to allocate Symondshyde as a strategic housing site. The 2007 Minerals Local Plan lists Land at Symondshyde Farm as part of Hatfield Quarry in Appendix 5: Specific Sites for sand and gravel extraction. Chapter 3: Strategic Policies shows Symondshyde as having 3.25 million tonnes with planning permission for extraction (table in paragraph 3.2.1). In paragraph 3.4.5, Symondshyde is shown as part of the permitted minerals landbank of 14.75 mt for the Plan period. Inset Map No. 8 shows the permitted area for sand and gravel extraction extending from Coopers Green Lane to Footpath 50, which cuts the proposed Symondshyde site in half.

Planning permission was granted in 2005 (application number 6/0439-03) for the extraction of sand and gravel from the land between Symondshyde Farm and Coopers Green Lane. The proposed extraction area was shown in the application as extending some way short of Footpath 50, but still impinging on the Symondshyde site. That permission is currently being implemented and is due to be completed by 2020, but experience of these cases suggests that it could overrun or be extended beyond that period.

Minerals Policy 5 – Mineral Sterilisation states that mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, and that the County Council will object to any development proposals within or adjacent to areas of potential mineral resource which would prevent or prejudice potential future mineral extraction, unless it is clearly demonstrated that ... there is an overriding need for the development and the mineral cannot practically be extracted in advance.

Appendix A to the Housing and Economic Land Availability Assessment June 2016 shows the main considerations taken into account in the Stage 2 assessment of potential sites. Against the heading Minerals development it states: "Whether the site is within or adjacent to a Minerals Resource Block or Preferred Area for minerals extraction, as defined in the Hertfordshire Minerals Local Plan, or a permitted minerals site; whether it is economically viable to extract any minerals on the proposed housing/employment site; whether there is a risk of sterilising the minerals resource or prejudicing minerals, housing or employment development of the sites in question; opportunities for extracting minerals as part of housing/employment development on the site; possible mitigation measures that could make the site suitable."

So far as we can see, these considerations have not been applied to the Hat15/SDS6 site at any stage of assessment. Nor can we find any significant reference to minerals considerations being taken into account with regard to the Symondshyde site in the reports and minutes of Cabinet Housing and Planning Panel meetings since March 2015, when the Symondshyde proposal was first put forward by Gascoyne Cecil Estates.

Hertfordshire County Council is currently in the early stages of reviewing the Minerals Local Plan. A 'call for sites' exercise was held earlier this year, and the Draft Review Plan is expected to be published in Autumn 2016. If, as seems likely (we have not had chance to check the Geological Survey), the glacial sand and gravel deposits extend over the Symondshyde site, the area will be proposed for inclusion as a preferred site in the Minerals Local Plan Review. The Review process is likely to take

2-3 years to complete, after which a planning application would have to be submitted and approved before extraction from the site could take place. Extraction and restoration of the site would then take several years, possibly extending to the mid to late 2020s.

This poses serious questions about whether the proposed village at Symondshyde could be developed within the Local Plan period. At present, it is scheduled for years 6-15 (2018-2027), which seems completely unrealistic if our assumptions about mineral extraction on the site are correct. Moreover, if restoration of the site were to involve backfilling with loose materials, it is questionable whether the site could be developed for residential purposes without expensive remediation measures.

The fact that no reference to the existence of minerals on part of the Symondshyde site or that the land immediately to the south east of the site is to be restored following mineral working is made in the Draft Local Plan is in contrast to other sites identified in the Plan such as SDS5 North West Hatfield, for which Policy SP22 specifies that the developer must demonstrate the extent of the mineral that may be present and that the likelihood of prior extraction in an environmentally acceptable way has been fully considered.

The Hat2 West of Hatfield site, which was included in the Local Plan Consultation Document January 2015 as a potential housing site, was discounted from the Proposed Submission Draft due to the need to extract minerals, fill and restore the site first. This is clear from page 168 of the LPCD 2015 Consultation Statement.

For the above reasons, we respectfully ask the Inspector to examine the impact mineral extraction will have on the SDS6 Symondshyde site, and consider whether the proposal is unsound in this respect.

Conclusion

This representation is submitted by the Save Symondshyde Campaign Group, which represents over 1,500 who have actively expressed a concern about the plans for housing development at Symondshyde. The group was formed in July this year in response to Welwyn Hatfield Council's late stage inclusion of this, previously unconsidered Green Belt site. It is important to note that our analysis has been hampered by the lateness of this proposal by the council and evidence bases that have only become available in July and August this year; some pieces of evidence only became available when the public consultation began on the 30 th August.

6

Please set out the changes you consider necessary to make the draft Local Plan legally compliant or sound including revised wording of any policy or text. Be as precise as possible. (Please note that any non-compliance with the Duty to Co-operate cannot be rectified at the examination). You will need to say why the change will make the draft Local Plan legally compliant or sound. (Attach supporting documents if necessary).

Complete removal of Symondshyde (SDS6) from the Local Plan.

(i.e. from SP24 and all associated references).

If the OAN numbers are justified then a proactive and even handed consultation properly considering the alternatives, and properly engaging the local community is necessary.

7

If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing? Yes, I wish to take part in the examination hearing, if invited to do so by the Inspector

8

If you wish to take part in the examination hearing, please outline why you consider this to be necessary:

- a) we represent over 1,500 members, the vast majority of whom live or work locally. Until our group publicised Symondshyde almost no locals knew or had been informed.
- b) we have considerable local knowledge of the area and understand better the likely consequences of such an incompletely thought through "plan" on the area than the one-sided and overly optimistic view presented by the council and the developers.

9

- Do you wish to be notified of any of the following:**
- . When the Welwyn Hatfield Local Plan has been submitted for independent examination.
 - . When the Inspectors Report of the Welwyn Hatfield Local Plan is published.
 - . Adoption of the Welwyn Hatfield Local Plan.

We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.) Yes

How did you hear about this consultation? . Word of mouth

We monitor the effectiveness of our consultation. Have you found this consultation helpful? No

What do you think we can do to improve our consultation?

Honesty, openness and communication. Actual Community involvement. Despite being engaged in the 2015 consultation and attending the drop-in events where I talked to Councillor M. Perkins and a number of officials and describing where I live (approx 600m from SDS6) either none of them knew the local area well enough, or were aware of the proposal or felt it their job to communicate with a local resident and tax-payer. If I hadn't been advised about the GCE Charette by a friend in St Albans - I would not have known!