

Response to Green Gap Assessment EX160, EX160A and EX160B, August 2019
by Land Use Consultants for Welwyn Hatfield BC

by SAVE SYMONDSHYDE
November 2019

1. This is a response by Save Symondshyde to the LUC *Green Gap Assessment* Final Draft Report, August 2019. An email from the Programme Officer on 6th October invited comments on various new documents, including EX160 and its supporting maps in EX160A and 160B.
2. Throughout the Examination we have heard not a single challenge to the principle, established in the adopted Local Plan and reiterated in the current draft Local Plan, that the existing settlement pattern in the Borough should be maintained. Save Symondshyde supports this principle. With towns and villages separated by narrow bands of countryside, the adopted Local Plan rightly states “It is this settlement pattern which gives the district its unique qualities and should be preserved” (para. 4.2).
3. National Green Belt policy does not refer specifically to maintaining the existing settlement pattern of an area, but the ‘purposes’ set out in paragraph 80 of the NPPF (2012 version) can generally be expected to have that effect. That is particularly the case through the purpose of Green Belts ‘to prevent neighbouring towns merging into one another’ (though that does not refer specifically to villages).
4. We sympathise with the Inspector’s suggestion that it might be appropriate for the Council, through the Local Plan, to consider specific additional designations to achieve separation between settlements and protection of the settlement pattern. We therefore support the work of the *Green Gap Assessment*. Its findings are striking. LUC recommends the designation of gap policy areas where they assess these are needed. These are summarised in Figure 4.1 on page 131. The Figure demonstrates that a substantial proportion of the Borough needs to be designated as gaps to protect the settlement pattern, including almost all the south-west and north-east sides of the Borough.
5. All the land proposed for a ‘gap policy area’ is already Green Belt. The proposed new designation therefore in effect provides an additional justified policy constraint on development in these areas of Green Belt. The evidence shows just how sensitive the fundamental character of much of the Borough is to additional significant housing development.
6. In respect of maintaining the existing settlement pattern, the task of the *Green Gap Assessment* has been made more onerous by the Borough Council including the Symondshyde new village allocation in the submitted Local Plan at the last moment, in defiance of its own key intention to maintain the existing settlement pattern. This has necessitated two additional gap assessments by LUC which would not otherwise have been needed: the areas between Symondshyde and Wheathampstead and between Symondshyde and Hatfield.

Area between Symondshyde and Hatfield

7. LUC recommend a 'gap policy area' between Hatfield to the south, Symondshyde to the west, Stanborough to the east and Brocket Park to the north. This gap policy area is larger than any other gap policy area proposed anywhere else in the Borough. Such a gap policy area would be entirely necessary if the Symondshyde new village were to proceed, but would otherwise not be required. The LUC assessment demonstrates the remarkable consequential impact of the new village proposal on a key underlying intention of the Plan – a wholly unnecessary self-inflicted wound on the Borough, challenging the existing settlement pattern. The *Green Gap Assessment* shows that the allocation of the Symondshyde new village site is still more unsound than it already was.

8. The principal assessment in the *Green Gap Assessment* relevant to Symondshyde properly concerns the nearest settlement to it: Hatfield. This notes that, compared with the existing gap of 1.2km at its narrowest point, "there is a strategic draft site allocation located on the settlement edge of Hatfield, with all of the land to the south east of Coopers Green Lane included within this allocation. If the allocation were to be built this would extend the edge of Hatfield towards Symondshyde" (page 115). The gap between Hatfield and Symondshyde would then be reduced to around 1km, across land the *Assessment* rightly describes as "particularly flat and there is currently a high level of intervisibility".

9. It seems to us remarkably foolish to create a wholly new gap between settlements across such land, which is almost inviting infill between them over time. Even a strong gap policy would prove unenforceable and ineffective in preventing the eventual coalescence of Symondshyde village with NW Hatfield. The gap of 1km between Coopers Green Lane and the proposed village would be unsustainable:

- Only limited infrastructure and services could be provided on the village site, so the settlement would be highly dependent on Hatfield for employment, education, retailing, entertainment and most facets of normal life.
- It is unrealistic to think that significant numbers of residents at Symondshyde would walk or cycle between the two, so there would a high level of car traffic across that gap, eroding the experience of this countryside.
- There is high intervisibility between Symondshyde and Coopers Green Lane/ Hatfield: the argument would inevitably be put in future that the sensitivity of this area to residential development is identified as only 'low-moderate', so would be less unsuitable to develop than elsewhere.
- The access road between the village and Coopers Green Lane would encourage ribbon development, initially of temporary activities and subsequently of permanent development and housing; there is already proposed in the Plan to be a traveller site on the north side of Coopers Green Lane in this vicinity.

10. Interestingly, in September 2017, consultants on behalf of Gascoyne Cecil Estates produced *A Landscape Vision for Stanborough and Symondshyde* (Examination document EX52) which sets out indicative proposals for what is described as “a sustainable multi-functional landscape” that would remain in agricultural use and maintain or enhance critical ecosystem functions whilst at the same time providing accessibility and opportunities for recreation. The plan on page 5 of the document shows the area bounded by Symondshyde Great Wood and Furze Field to the west and by a secondary access road between the village and Green Lanes to the east. This is precisely the area between Symondshyde and Coopers Green Lane that we consider would be most under threat if the Symondshyde development were to go ahead. The indicative proposal would represent an artificial semi-urbanisation of an area that, ideally, should be allowed to revert to agriculture or be re-wilded naturally, in harmony with the Symondshyde site as it is now.

11. In short, we believe that a relatively narrow gap between Symondshyde and NW Hatfield could not be protected, the proposed new settlement is wholly unsound, and the only solution is to drop the Symondshyde allocation.

Area between Welwyn Garden City and Wheathampstead

12. As noted above, the allocation of a new village at Symondshyde would prompt the need for a gap policy area in a wide area of countryside between Symondshyde to the west and both Hatfield (to the south-east) and Welwyn Garden City (to the east). That area of countryside would be at some risk. However, this reality has not been reflected in the review in the LUC *Green Gap Assessment* of the gap between Welwyn Garden City and Wheathampstead (in St Albans district), pages 59-62. The effect of this omission has been to understate the risk to green gaps by making a housing land allocation at Symondshyde.

13. The study area for the gap between Welwyn Garden City and Wheathampstead clearly includes the area of the Symondshyde new village (Map 1 on page 59), which would be about equidistant between the two. The *Assessment* concludes that no gap policy area is required. That seems odd because LUC accepts that such a gap policy area is indeed required between Symondshyde and Welwyn Garden City, suggesting that a risk does indeed exist across about half the separation distance. The section on ‘Pressure on the Gap and Potential impact of promoted sites on the Gap’ states “There are no draft allocations proposed within the area that falls within Welwyn Hatfield Borough between these settlements (the nearest proposed allocation is the new settlement of Symondshyde).” Whilst Symondshyde would not be on a direct line between the two settlements studied, it is not far off, and the statement quoted is incorrect. Symondshyde is within the study area and is a draft allocation, which should not have been ignored. The same section of the report notes that while development of seven other sites in the study area put forward following the 2019 ‘Call for Sites’ “would not threaten the existing gap between Welwyn Garden City and Wheathampstead, they would impact on the countryside outside the existing settlement boundaries”. If that is true of the relatively modest new proposals, how much more true that statement clearly is of the Symondshyde allocation. In addition, all the land to the north and west of the Symondshyde allocation is identified as of ‘moderate-high’ landscape sensitivity, i.e. the second-highest sensitivity, and merits protection from inappropriate development in this gap.

Area between Symondshyde and Wheathampstead

14. Regarding the gap between Symondshyde and Wheathampstead, the *Green Gap Assessment* concludes “The area between the proposed new settlement of Symondshyde and Wheathampstead [is] around 2km and includes robust features including Symondshyde Great Wood (also a Local Wildlife Site) which would prevent any expansion of Symondshyde north-westwards towards Wheathampstead. It is concluded that there is no need for a ‘gap policy’ area in this location” (page 112). Save Symondshyde is not pressing for a Green Gap between Symondshyde and Wheathamsptead – rather we think the Symondshyde allocation is wholly unsound and should be deleted – but that does not mean we accept the LUC assessment.

15. Symondshyde Great Wood and its northern extension Titnol’s Wood would indeed prevent expansion of Symondshyde to the west. However, we do not consider the woodland perimeter as reliable as LUC. There is a substantial break in the woodland on the north side of the proposed new village, towards Cromer Hyde. This is in the direction of Wheathampstead. There is therefore a risk of creeping expansion towards Wheathampstead, which should be acknowledged and resisted. Nor do we consider that the lack of intervisibility between the Symondshyde site and Wheathampstead is a determining feature of the case for being cautious about the creeping erosion of green gaps. This issue was a not a discrediting feature when LUC proposed a gap policy area between Hatfield and St Albans, for example, just as it should not be between Symondshyde and Wheathampstead.

Conclusion

16. Taken as a whole, we are broadly supportive of the approach taken by LUC in its *Green Gap Assessment*, subject to the qualifications raised above. We agree there is a strong case for a gap policy area to be created between Symondshyde and Hatfield. However, the *Assessment* demonstrates the unsoundness of allocating a new village at Symondshyde in view of the substantial additional risk this would create to further infilling between settlements in future, especially between Symondshyde and Hatfield, and the need for a large additional gap policy area to try to resist this.

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