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Welwyn Hatfield Local Plan Examination Round-Up session 12 March 2020 – Amended Birchall Garden Suburb and Symondshyde

(Para 4 in the Symondshyde section has been amended for clarification and is highlighted in red.)

Introduction

You are probably aware that I have had reservations concerning the soundness of aspects of both of the proposals that we have discussed over the last couple of days. I have previously said that Symondshyde should only be considered if there are not sites that could be developed in more sustainable locations and I intended to examine it when there was much more information before the Examination about the alternatives.

I have also had reservations about the implications of the southern part of the Birchall Garden Suburb proposal, for the openness of the wider retained Green Belt, which I have also discussed previously. Having said that I am not immune to the implications for the local plan from what is happening in other forums and I am obviously aware that the Council is clearly having difficulty finding sites to provide the opportunities to build the number of dwellings that would meet its Full Objectively Assessed Housing Need (FOAHN).

I have therefore reviewed the situation and decided that the most appropriate way forward now is to conclude the Examination of the Regulation 19 Plan, that is the Plan that the Council submitted for Examination to the Planning Inspectorate in the Summer of 2017, and to write an interim report on my findings, in which I will be inviting the Council to take the necessary steps to make the Local Plan sound. That is why we have had the Hearings this week and will be having further Hearings in May to consider everything in the Regulation 19 Plan that has not yet been examined.

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Unfortunately, I am unable to give you a final decision on the soundness of either of these proposed allocations at this stage. Among other reasons this is because I am unable to determine whether or not exceptional circumstances exist to release either site from the Green Belt. This is primarily because there is insufficient information about the availability of sites in sequentially preferable or more sustainable locations, and on the comparative impact of developments on the openness and purposes of the Green Belt. Additionally, I do not know fully the relative consequent impacts of mitigation on the purposes of the Green Belt, for either site or for other potential alternatives. Furthermore, I do not have sufficient information on the site and sustainability implications of releasing either site for development.

Symondshyde

To begin with Symondshyde. If there is a justification for a new settlement and subject to the above provisos, my current thoughts are that I would be likely to find sound, in principle, proposals for the removal of land to the South West of the skyline above the B653 between Long Spring Grove and Coopers Green Lane and East of Hammonds Lane, from the Green Belt, and to be able to justify this through exceptional circumstances. That is assuming there is appropriate mitigation in certain areas where the land is very open. However, on the evidence before me I have significant doubts about the sustainability of the submitted proposals. Firstly because of the size of the proposal and secondly because of its accessibility in the context of the other developments and facilities in the wider area.

Within the general location of the proposal, as set out in the submitted Local Plan and in the context of the Council's apparent difficulties in finding sufficient housing land to meet its FOAHN as well as assuming that there are not more sustainable alternatives, I consider there to be some scope to extend the site

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in minor ways between Long Spring Grove and West Grove, subject to copse planting, and to the East of Long Spring Grove to the public footpath, again with some sort of natural screening.

However, based on the information before the examination, I consider that the most sustainable location for a development of this critical mass in this part of the Borough, or an even greater amount of development, is much closer to the western edge of Hatfield than has been proposed.

If this is not a deliverable option, I would invite the Council to prepare a statement for the Examination that clearly justifies why such an option on **some of the land west of the existing/proposed extent of development between north of St Albans Road at Ellenbrook and west of Green Lane at Stanborough would not be available for development before 2036.**

Additionally, I would ask the Council to justify how the Symondshyde proposal would create a sustainable neighbourhood. In that context I am most concerned about its transportation links but also the viability of retail and community facilities. Examples from new settlements elsewhere that demonstrate the levels of services that similar or larger populations can sustain would be useful. Ideally the settlement ought to be able to support some health and catering/refreshment facilities as well as the others that have been indicated.

Additionally, I would require more information on how a sustainable transportation scheme could be successfully introduced into the development (presumably buses?) and result in a noticeable change in the otherwise expected modal split for journeys from and to the site. Such information should include realistic assessments of likely bus services that could serve the site and their frequencies. It should also have the support of the bus operators.

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I would also ask The Council to look at the possible advantages for increasing the availability of non-car transport to this location and for improving the range of facilities available, through an increase in the critical mass of the development, either to provide additional dwellings to meet the current FOAHN or to provide for further growth beyond the Plan period if the FOAHN can be met from the use of more sustainable sites elsewhere.

Birchall Garden Suburb

My thoughts on this development have not changed since my previous pronouncements on this site. I still have considerable concern about the soundness of releasing the Southern section of the site from the Green Belt because of its likely harm to the visual openness of the remaining Green Belt to the South and particularly to purpose 3 Countryside Encroachment.

I have some concerns about development on the land between the Eastern arm of Hatfield Hyde Brook and Burnside, in the context of the wider Green Belt to the south and the impact of noise from Burnside upon future residents residing close to the southern boundary but I am confident that these could be mitigated. I need to examine further the noise reports and the suggested mitigation before the Examination, before I can make a detailed pronouncement on these matters.

At the site visit I was shown a field to the west of the proposed development site to the north of the eastern arm of Hatfield Hyde Brook. It appears to have lain fallow for a number of years, still only has limited vegetative cover and is clearly distinguishable from the woodland further to the west. I also noticed the obvious extent of public use of this and the wider area and the damage to the habitat in the Commons Local Nature Reserve. The public's use of these areas is clearly in conflict with the maintenance of the area's wildlife. A large

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development immediately to the east would undoubtedly lead to a further deterioration in the ability of this land to function as a habitat for wildlife.

Policy SADM 16 Ecology and Landscape says that proposals that would result in loss of or harm to ecological assets of local importance, including ecological networks, will be refused unless the mitigation hierarchy has been fully implemented. The Council needs to give some consideration as to how this is to be achieved. Additionally, would it look at the potential to enlarge the northern part of the proposed development site by incorporating the field referred to above and possibly other land, into the development and making compensatory provision for wildlife protection in (a) location(s) that (is) (are) less likely to be subject to human interference. In particular, could this be a more sustainable long-term option from a wildlife perspective than the status quo?

However, I am less sure about the ability of the proposed mitigation along the southern boundary to prevent development on the southern fields from being clearly visible and affecting the open experience of the remaining Green Belt countryside to the south of the A414. At the present time the development site is a part of this Green Belt countryside experience.

The Promoters referred me to a bund development at Pinehurst. At the present time that bund does not totally screen the development from the A414 during daylight hours and at night there is considerable light pollution. It might be that a different scheme could screen development from the public footpaths to the south of the A414 at Birchall Garden Suburb. However, I do not have sufficient information to make an assessment.

I would like a plan that indicates spot heights along the northern side of the A414 at Pinehurst and adjacent to the dwellings on the other side of the bund, details of the bund height and planting and the eaves and ridge heights of the adjacent dwellings.

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To assist me further in this matter I would also like a plan of the area between the lane between Essendon and Hatfield Park to the west of West End and the southern boundary of the former refuse tip above the proposed housing/northern boundary of Burnside with contours and spot heights. The promoters have submitted two cross sections (A and B) between locations on the public footpath close to the river Lea to the south of the A414 and points north of the eastern arm of Hatfield Hyde Brook. The drawing is referenced 2284-4-4-1 DR-0008. Similar cross sections further east from points above the 70 metre contour along the public footpath between Essondbury Farm and Hillend Farm and the two northern extremities of the proposed development, one between the two copses and the other at the eastern end of the development, would be helpful. Like the existing cross sections, these should show the height and width of the proposed bund and the height of the built development on the northern part of this part of the site in these locations, along with other necessary development features such as the swales.

Sustainability Appraisal, Windfalls and Density

Please make sure that if there are changes to the Sustainability Appraisal, these are rationally explained and there are clear sound planning reasons justifying why there has been a change.

Windfalls and Density

If you wish to change the density or the windfalls from those submitted, then there will need to be a justification in planning terms as to why they need to be changed at this stage. Following the adoption of a local plan, it is usual for the amount of housing development coming forward through windfalls to significantly reduce because there is a new supply of allocated sites and a reduced need for the development industry to obtain land upon which to build dwellings by way of speculative proposals. Similarly, if site(s) density is to

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increase above that which was assumed by the Regulation 19 Plan then it must be accompanied by a clear justification as to why it is likely to be a more reliable forecast than the one previously submitted.

23.3.20