

Welwyn Hatfield Local Plan Examination

Save Symondshyde Response to EX248 WSP/GCE Response to DTA Technical Note *Symondshyde Public Transport and Access Strategy* attached to David Lock Associates' Response to EX228

1. Save Symondshyde are grateful for the opportunity to respond to Examination Document EX248 the WSP response on behalf of Gascoyne Cecil Estates to the DTA Technical Note on the Public Transport Strategy for Symondshyde dated October 2020. EX248 was produced after the Stage 9 hearing on Symondshyde, when GCE failed to respond in any detail to the DTA document, so that we were unable to present all our evidence at the hearing as we would have liked. This is the first opportunity we have had to comment on the additional evidence contained in EX248.

Re-routeing and frequency of services

2. Proposals presented in EX248, and earlier in EX202E, for re-routing some existing services through Symondshyde and for significantly extending operating hours are extremely tentative and, quite frankly, lack credibility.

3. EX248 paragraph 012 onwards refers to the operating hours proposed in Table 2.3 of EX202E and suggests that ***“there may be merit*** [emphasis added] *in extending the deployment of a bus to include”* what amounts to an additional hour on weekday early mornings, an additional hour on weekdays and Saturdays, and an additional hour on Sundays/Bank Holidays. These illusory extended operating hours are claimed to cater for a wider range of needs and thus support higher patronage.

4. EX202E paragraph 1.3.1 lists six bus routes as running close to NW Hatfield and Symondshyde and serving a wide range of destinations. In fact, as we pointed out in our response to EX202E, no existing services run ‘close’ to Symondshyde, the nearest point on (Coopers Green Lane) being 1.3 km away from the centre of the proposed new settlement. Moreover, few of the existing services identified serve Welwyn Garden City or Hatfield stations (where the station is relatively isolated from the town centre) and none of them serve all of the key destinations in Welwyn Hatfield along a continuous, coherent line.

5. Contrary to the assertion in EX248 paragraph 003, the Uno letter of 29 October 2020 did not confirm support in principle for the public transport strategy and assessment; it merely indicated a willingness to consider making changes to bus services. The letter reveals that it is only the 601 or 610 routes that ***“there may be scope”*** [our emphasis] to re-route through Stanborough and Symondshyde, possibly in such a way to have a minimal impact on running time. Neither of those routes serves Hatfield railway station, and only the 601 serves WGC bus/railway station (see Figure 2 in EX202E).

6. Both services are listed in Table 1.1 of EX202E as covering mid-distance destinations Welwyn GC – Hatfield – St Albans – Borehamwood (601) and Enfield – Potters Bar – Hatfield – Harpenden – Luton (610) on a half hourly or hourly frequency. Analysis of the timetables, however, shows that this gives a misleading impression. In fact, the services are

fragmented, with some services starting or stopping short of the furthestmost destinations, so that the full route is covered by only about half the scheduled services each day.

7. EX248 paragraph 015 states that initial re-routing could be achieved at commencement of construction and that the distance from Symondshyde to Hatfield station through Stanborough is approximately 5kms. This sounds so simple, but it ignores the fact that, on the current timetable, the 610 takes 22 minutes from the Green Lanes junction with Coopers Green Lane to reach Hatfield town centre (the nearest point to the station) via the Business Park and University campus. With a loop through the Symondshyde development adding 5-10 minutes to the timetable, it would take around 30 minutes for a commuter from Symondshyde to get to Hatfield station by bus. Adding in waiting time at the bus stop of up to 20 minutes means that there would be little incentive not to use the car.

8. Paragraph 015 states that a 'dedicated' service (which we assume means the new bus service described in EX202E paragraph 2.4.3 and Figure 5) would follow on "slightly later" than the commencement of construction. This is misleading. Construction at Symondshyde is not expected to start until later in the 5-10 year period following adoption of the Plan, and at the build-out rate of 150 dwellings per annum assumed in EX202E paragraph 2.4.2, for a development of 1,500 dwellings, would take ten years to complete. There is no clear indication of when a dedicated service for Symondshyde might be implemented.

Mode share and Viability

9. As we pointed out in our response to EX202E, the projected increase from the current 3% modal share by bus for journeys to work to nearly 10% is unfeasible and is unsupported by any clear evidence. There is nothing in EX248 to alter this perception of the proposed public transport strategy. We do not believe that extending the assumption of journey to work mode share to all journey purposes supports the projected modal shift, for two main reasons. Firstly, the high proportion of car ownership in a development such as that proposed at Symondshyde would be a disincentive to using public transport, and secondly, families with children making journeys for shopping, leisure and other purposes would be reluctant to rely on bus services if a car was available to use.

10. The HCC statement of 1 June 2020 in support of the WSP/GCE strategy (Appendix A to EX248) states that "*a high frequency public transport service is deliverable throughout the development of the site and self-sustaining beyond completion of the development*". All the evidence is that the service would not be self-sustaining until after Year 13, according to Table 1 in EX248, and this is based on optimistic assumptions about the frequency and patronage of services. Remarkably, the subsidy now required is more than double what was estimated in EX202E, due to assumed revenue declining as a result of increased 'concessions' and the annual cost of provision increasing by nearly one third throughout the 15-year period.

11. If, as seems likely, the level of patronage falls short of the nearly one million journeys per annum assumed in Table 1, and annual costs prove to be marginally higher than assumed, self-sustainability would never be achieved. No realistic assurances have been

given about how the service would be funded if it could not be made profitable. The likelihood is that it would fail, and without open-ended subsidies from either the promoter/ developer or the County Council or successor authority, the operator would have no option but to cut services to reduce costs, as has been the pattern nationally for many years.

Conclusion

12. Symondshyde would be an isolated development, not large enough to be sustainable in its own right, too far from the existing urban areas to be able to take full advantage of existing infrastructure, and requiring massive investment in supporting services to make it viable. The public transport strategy put forward, while entirely laudable, is purely aspirational. It represents mitigation on a huge scale to try to compensate for the disadvantages of meeting the housing requirement in a free-standing new settlement.

13. The Inspector has already indicated that development adjacent to existing urban areas with established public transport facilities and ready access to a railway station would be preferable to an isolated development such as Symondshyde. We invite him to conclude that the public transport strategy for Symondshyde is unviable and does not meet the sustainability test.

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