

RESPONSE BY ANTHONY BURROWS, 85 PIXMORE WAY, LETCHWORTH GARDEN CITY TO THE PRELIMINARY CONSULTATION ON THE DRAFT LOCAL PLAN ISSUED

BY NORTH HERTFORDSHIRE DISTRICT COUNCIL

VITAL POINTS:

- **CONSULTATION NOT MEANINGFUL FOR ORDINARY VOTERS** The Consultation, even though preliminary, does not present various alternative possibilities to enable local voters to have a meaningful input into the draft proposals. One unmentioned possibility was no re-zoning of Green Belt just to meet ONS housing figures, as allowed under the new Official Guidance issued on the 6th October 2014 and confirmed by Parliamentary Guidance given in a Written Answer to our M.P., Sir Oliver Heald – but, as I said at the full Council meeting November 2014, I realise that the notice given was probably too short for the new Guidance to be acted upon by North Hertfordshire District Council (my District Council). Another deficiency of the Consultation is that the present one does not appear on my District Council’s website’s A-Z home page list under “Consultations”, which was mentioned to me by several voters and which was drawn by me to the attention of my District Council’s Chief Executive on the [], but no correction of that serious omission has been made.
- **NORTH HERTFORDSHIRE ALREADY DONE ITS DUTY** The area now covered by my District Council has done more than its fair share of providing new dwellings than England as a whole. The draft Local Plan figures show that our area has virtually doubled in number of dwellings since 1965, whereas England as a whole has only increased its new dwellings by two thirds over that period.
- **THE PROPOSALS ARE NOT IN THE CONTEXT OF PROPOSALS BY NEIGHBOURING COUNCILS** I was particularly surprised to see that there does not appear to be any detailed consideration given to the proposals by such Councils, even though they will obviously impact greatly upon my District Council’s area.
- **VERY DANGEROUS PRECEDENT** Once any re-zoning of Green Belt by my District Council is included in the final Local Plan, our Councillors will have sold

the pass because then the permission given not to encroach on the Green Belt will have been ignored, so that any proposals by my District Council will descend again into whose portions of my District Council's Green Belt should be re-zoned. Another serious disadvantage is that the Planning Inspectorate would have justification for assuming that my District Council had no objection in principle to allowing future building on its Green Belt.

- **TRUE GROUNDS FOR RE-ZONING NOT VALID** It is an open secret that Hertfordshire County Council ("my County Council") wishes Green Belt land around Baldock and owned by us Hertfordshire voters to be re-zoned residential because it wants the money (several hundred million pounds) which it would hope to raise by residential development. I cannot find any precedent under Planning laws and practice for such a ground for rezoning of part of a Green Belt.

It is also an open secret that Letchworth Garden City Heritage Foundation ("our Foundation") wishes Green Belt land around our Garden City and owned by us Letchworth citizens to be re-zoned residential because it wants the money (about one hundred million pounds) which it would hope to raise by residential development. I cannot find any precedent under Planning laws and practice for such a ground for rezoning of part of a Green Belt.

- **DRAFT LOCAL PLAN PROPOSALS ONLY SPRAWL** Virtually all of my District Council's Green Belt/unspoiled land proposed to be re-zoned as residential is in the form of extending existing settlements, whether of our towns and villages, or of Luton and Stevenage, i.e. is simply housing sprawl, which is contrary to national planning policy for England.
- **LACK OF REQUIRED CONSIDERATION OF INFRASTRUCTURE** The draft does not contain any clear explanation as to whether, if the quantity of new dwellings proposed by 2031 goes ahead, our existing infrastructure (in the way of roads, schools, social services, medical services, etc.) will be able to cope. It does not seem even to mention whether the relevant other authorities, such as the National Highways Agency, Hertfordshire County Council, Network Rail and the National Health Service, have been asked for their own forecasts on those important issues, although Parliament and Government would appear to require careful consideration of such issues to be done as part of the Local Plan process.

- **NO CLEAR, SUSTAINABLE EMPLOYMENT PLAN** The proposed 14,000 – 15,000 new dwellings would provide about 20,000 to 25,000 new workers; the plan provides for about 4,000 new jobs. Even assuming significant retirement rates, which are increasingly proving unrealistic, as more people retire later or work part-time, where are the surplus to work? Obviously, not outside our area, since that is unsustainable in environmental terms. Past large residential expansions of our towns were normally accompanied by large expansions of employment, which was of course an essential part of the planning process, especially for our Garden City.
- **I AM NOT A “NIMBY”** I accept that our District Council should look to provide sufficient new dwellings for the natural growth of its own population (about 5,900 between 2011 and 2031, according to the Local Plan’s figure for nil net immigration). That would meet the needs for the young, the families and the elderly. I am very disappointed that certain persons in authority should try to persuade our District Council’s voters that 12,000 to 14,000 new dwellings are required to meet the needs of young people here, when they must know that that is not true.

GEOGRAPHICALLY PARTICULAR POINTS:

Generally

Each of my District Council’s four towns (and villages) has its own character and I strongly believe that those characters should be fully respected by my District Council.

Baldock

I strongly oppose any re-zoning of the Green Belt around this town, since the Clothall Common development itself increased the size of this traditional market town by about one third and virtually to double its present size would completely destroy its pleasant character.

Bygrave

The Green Belt re-zoning proposals for Baldock would virtually fill in the gap between the two settlements and thus damage the highly individual character of this village.

Graveley

The proposal for re-zoning of Green Belt adjacent this village would lead to its being practically swamped and probably, in the long term, absorbed into an ever-expanding Stevenage. I again strongly oppose that.

Hitchin (Walsworth)

I am opposed to the re-zoning of the Highover Farm land, since that nibbles away at the Green Belt between Hitchin and the South West of our Garden City, which my District Council has itself strongly opposed since it was formed in 1973.

Letchworth Garden City

I naturally oppose any re-zoning of any of our Green Belt around the whole of our town. I particularly oppose re-zoning of the land to the North and West of the present Grange Estate.

Garden City Principles

In relation to our town it is vital that Garden City principles should be strongly maintained and my District Council has done that since its formation in 1973.

- (i) The overwhelming principle is that our town should not increase its population to more than about 32,000. That has been slightly exceeded by, in particular, the development of the Standalone farmland. It is incontrovertible that our leading Founder, Mr. Ebenezer Howard, considered that about 32,000 was the maximum for a Garden City to retain its social cohesion, which is so vital for future generations. Even that was at a time when social cohesion was generally much greater than it is now. The new dwellings figure from 2011 – 2031 proposed mainly by our Foundation and my District Council for our Garden City is about 2,000, implying a population increase of about 5,000, which would take our population to almost 40,000, which is well above our planned size.
- (ii) The Grange Estate was planned as a rounding-off of the Northern part of our Garden City. Entry and exit to that Estate were planned so that vehicles did not need to pass through other Estates, such as the Westbury and Wilbury Estates, in our town. All of the more recent Estates, such as the Jackmans, Lordship and Manor Estates, do not have access through other Estates. It is totally against Garden City principles to arrange for a large new Estate to have at least majority access through another Estate, since that obviously

detracts from the wellbeing of the citizens of the latter, which itself is clearly contrary to the principles upon which our Garden City was founded.

In particular, the two existing accesses to the present Grange Estate (including Standalone) are either at the maximum environmentally acceptable vehicular flow levels (Grange Road) or are above such levels (Eastholm/Eastern Way), as can be seen from the highways specialists, Cottee's, report to our Foundation, which we understand has been made available to all Councillors. To worsen those levels very greatly, which would be the result of the proposed new Estate (as implicitly acknowledged by Cottee), would again be totally contrary to Garden City principles.

- (iii) Another vital principle of any Garden City is the provision of a wide Green Belt around it. The Green Belt around our Garden City was the World's first, planned Green Belt. Among the important features of a Green Belt is that it constitutes a home for wildlife, as well as a corridor for fauna; as that Green Belt is narrowed, such as proposed between our Garden City and Stotfold, and, probably in the future, between our Garden City and the Bedfordshire boundary, where building up to the boundary could not be controlled by my District Council or our Foundation, the effect on wildlife, particularly fauna, would be very serious. When our Foundation offered our Green Belt land to the North and West of the Grange Estate, it does not appear to have sought any significant information about the wildlife present in and using that land. I attach a report in this respect by Mr. Brian and Mrs. Terri Sawford. Councillors will know that Mr. Sawford is a (probably the) leading expert in biodiversity in this area. You will see that a significant proportion of the identified species in the report are on the Red and Amber lists for conservation priority. It will be noted that Mr. Sawford is of the expert opinion that enough data exists in relation to the site in question that it is worthy of "County Wildlife Site" designation. I thus believe that, if any change in the Green Belt zoning of the site is to be made (which I oppose anyway) none should be made until a thorough investigation of wildlife needs has been carried out by another genuine, independent, local expert and reported to my District Council.
- (iv) Another of the basic principles of Garden City design is to leave significant areas of green, such as allotments, spinneys, open grassland, etc. among residential and industrial areas, but this seems to be being completely overlooked in the draft. For example, there are proposals to allow building on remaining green areas around the former Norton Secondary School and

on the allotments to the East of Green Lane (although maybe the latter is temporarily on hold). I am strongly opposed to those because they are contrary to the principle of having green lungs in a Garden City.

Luton (Cockernoe etc.)

I was astonished by and strongly disagree with the proposed re-zoning of attractive countryside, to provide over 2,000 new dwellings and so swamp these villages, in order to meet the anticipated needs of Luton Borough Council (LBC). Have my District Council's Officers thoroughly satisfied themselves that the housing need of LBC based on nil net immigration requires that re-zoning? Please let me know what the need figure is for nil net immigration for LBC and the extent of its ability to meet that within its own boundary.

Stevenage

I seriously question, to the extent of being opposed to, the proposal to re-zone Green Belt land to the West of Stevenage, apparently not to meet Stevenage Borough Council (SBC)'s need up to 2031, but to meet what my District Council guesses SBC may need after then (?). What is supposed to be SBC's genuine need (i.e. with nil net immigration) up to 2031? Have my District Council's Officers themselves thoroughly reviewed that genuine need calculation for SBC, and borne in mind the large amount of unused commercial provision in the town centre, which I understand is controlled by SBC itself and thus should be available for a large amount of residential provision?

COUNTERPROPOSALS:

It has become increasingly clear that avoiding invading our District Council's Green Belt land and instead promoting a new Garden City somewhere in North Hertfordshire is rapidly becoming the preferred option for North Hertfordshire's electorate, as reflected by the strongly supportive views given very recently by my District Council's 3 M.P.s.

Many voters now seem to feel that such new Garden City could well be adjacent Ashwell Railway Station. I note that South Cambridgeshire District Council (SCDC) has been approached by my District Council in that respect, but has declined to consider the possibility. I propose that the possibility now be pursued at a national Governmental level, particularly since I understand that local planning authorities are under an obligation to co-operate with each other in relation to housing etc. needs and I tend to feel that my District Council may have been put

off too easily in the past from following up that possibility, which would seem to have become more feasible in the light of the views recently expressed by the 3 M.P.s.

Our Councillors should instruct my District Council's Officers immediately to bring forward proposals to establish a five-year supply of residentially zoned land, (other than Green Belt land and unspoiled agricultural land), based upon the genuine local need, namely about 4,500 (5,900 minus about 1,500) new dwellings by 2031.

In that respect, I have a friend who specialises in improving/developing various residential sites, always with existing buildings on them. He and I visited a number of sites in Hitchin and our Garden City over the weekend, the 16th to 18th January, when we came up with the following serious thoughts (all of these thoughts are for sensitive developments which take into account the existing character of the area – many more dwellings could be squeezed in if the developments were to be insensitive):-

- Minsden Care Home, Wratten Road West, Hitchin. The Home presently accommodates 48 elderly people. Another 10 or so could be added. I believe that Hertfordshire County Council owns the land and the care home.
- Hitchin Museum, Paynes Park, Hitchin. 10 flats for the elderly within the existing old house (this could be increased if the Library could be moved to presently unoccupied retail premises in the Town Centre). I believe that my District Council owns the house and the land, but maybe with restrictive covenants.
- Hitchin Police Station (empty) - 40-50 flats for the elderly. I should guess that the land and building are now probably owned by the Hertfordshire Police Authority by compulsorily transfer from Hertfordshire County Council, but I could be wrong.
- Rosehill Hospital, Hitchin Road. At least 120 flats for the elderly could be added, while retaining (and in fact greatly improving) the facilities for the Complementary Medicine Centre. The large, attractive building at the front, together with the lawn and trees at the rear would obviously be retained and continue to form a very attractive centrepiece of the site. One would wish to retain at least most of the trees within and around the site so as to maintain its Green Belt appearance and character and conceal replacement and additional blocks which could be built. I believe that the land and the buildings are owned by the NHS.

- Town Lodge, Brotherhood Hall, NHDC Document Centre, and the Letchworth Museum. This site could be developed to provide about 50-70 flats, while retaining the Museum garden and retaining the exteriors of Town Lodge and the Museum. If the County Council Library were to be included in such a development, it would be possible to add another 30 flats. I believe that the landowner of the site is the Foundation, with Hertfordshire County Council having the lease of the Library and the remainder being leased by my District Council.
- Empty Thai Garden and Jupiter Restaurants in Gernon Road. The Thai Garden could provide about 6 flats, whilst the Jupiter Restaurant could provide about 10 flats. I believe that the owner of the land is the Foundation and that the lessees of the Commerce Centre have the lease of those two buildings, but I may be wrong.
- Letchworth Police Station seems to be virtually empty. About 50 to 100 flats could be provided there. I should guess that the land is owned by the Foundation and the building is owned by the Hertfordshire Police Authority.
- Freeman House, Radburn Way. There are presently 48 self-contained rooms for the elderly. Another 20 could be added with no difficulty. I believe that Hertfordshire County Council owns the land and the care home.
- Former Lannock School site, Whiteway. There is a Planning Application for a 75-bed residential care home. There is presently enough room to the right-hand of the site for another 50-70 flats.

All of the above, which my friend and I could conservatively estimate to total 400 new dwellings, could help to reduce the amount of any Green Belt required to provide the 4,500 new dwellings of the remaining genuine local need by 2031. I cannot believe that, if two amateurs can reveal such relatively large number of unmentioned possibilities, that my District Council's Officers would not be able to reveal many more throughout North Hertfordshire.

Particularly in relation to the town centre sites, I believe that they should be sheltered accommodation for the elderly, since that would not only help the elderly themselves but would encourage movement of local elderly out of under occupied housing, leading to an increasingly better level of dwelling occupation, with families moving into the largest houses and young people moving into the flats and small houses so vacated.

Our Councillors should instruct our District Council's Officers that no Green Belt land should be used in a revised draft Local Plan for the final Consultation.

Our Councillors should instruct our District Council's Officers to investigate various possible sites for a further genuine Garden City in the general area of North Hertfordshire.

Dated this 6th day of February 2015

Anthony Burrows