

**RESPONSE BY THE “SAVE THE WORLD’S FIRST GARDEN CITY” GROUP 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 we realise that the notice given was probably too short for the new Guidance to be acted upon by North Hertfordshire District Council (our District Council).
- **NORTH HERTFORDSHIRE ALREADY DONE ITS DUTY** The area now covered by our 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** We were 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 our District Council’s area.
- **VERY DANGEROUS PRECEDENT** Once any re-zoning of Green Belt by our 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 our District Council will descend again into whose portions of our District Council’s Green Belt should be re-zoned. Another serious disadvantage is that the Planning Inspectorate would have justification for assuming that our 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 (“our 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. We 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. We 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 our 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. Evening 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 expansion 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.

- **WE ARE NOT “NIMBYS”** We 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. We are 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 our District Council’s four towns (and villages) has its own character and we strongly believe that those characters should be fully respected by our District Council.

Baldock

We 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. We again strongly oppose that.

Hitchin (Walsworth)

We are 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 our District Council has itself strongly opposed since it was formed in 1973.

Letchworth Garden City

We naturally oppose any re-zoning of any of our Green Belt around the whole of our town. We 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 our 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 our 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 our 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. We 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. We thus believe that, if any change in the Green Belt zoning of the site is to be made (which we 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 our 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). We are strongly opposed to those because they are contrary to the principle of having green lungs in a Garden City.

Luton (Cockernoe etc.)

We are 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 our District Council's Officers thoroughly satisfied themselves that the housing need of LBC based on nil net immigration requires that re-zoning? Please let us 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

We 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 our District Council guesses Stevenage may need after then (?). What is supposed to be SBC's genuine need (i.e. with nil net immigration) up to 2031? Have our 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 we 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 our 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. We note that South Cambridgeshire District Council (SCDC) has been approached by our District Council in that respect, but has declined to consider the possibility. We propose that the possibility now be pursued at a national Governmental level, particularly since we understand that local planning authorities are under an obligation to co-operate with each other in relation to housing etc. needs and we tend to feel that our 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 our 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.

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

(Acting Chairman)