

**HARPENDEN GREEN BELT ASSOCIATION'S RESPONSE TO
ST ALBANS DISTRICT COUNCIL CONSULTATION ON LOCAL PLAN 2018**

General Comment

We appreciate the Council attempting to make this survey simple and readily comprehensible to residents. However, one of its weaknesses is that it surveys views across the District, whereas the local plan needs and priorities for St Albans City may be very different from those of Harpenden, and the villages may be different again. We are concerned that the analysis may be skewed as a consequence.

Getting our priorities right

Q1: Enter the numbers 1 to 6, where you think 1 is the most important and 6 is the least important

Build homes in the right place	1
Build the right kind of homes	1
Provide local jobs	2
Protect the Green Belt	1
Protect our historic buildings, wildlife sites and areas of natural beauty	1
Get the transport, schools and other infrastructure we need	1

Please add any other comments:

This question wrongly assumes that you cannot give equal weight to all of the above objectives. Why, for example, should we have to choose between building homes in the right place and getting the transport, schools and other infrastructure we need? Isn't a big part of building homes in the right place making sure that both new and existing residents are supported by all necessary infrastructure?

Build homes in the right place

Q2: Here are 5 ways we can build more homes. Enter the numbers 1 to 5, where you think 1 is the best idea and 5 is the worst.

Q3: Circle how you feel about each idea.

Add more homes into existing built up-areas	1	(smiley face)
Build on 8 areas that least meet green belt purposes	5	(very sad face)
Expand existing villages into the Green Belt	3	(sad face)
Further expand existing towns into the Green Belt	4	(sad face)
Create new "Garden Village(s)" in the Green Belt	2	(sad face)

Please add any other comments:

The introduction to this question contains some comments that are seriously misleading.

It encourages respondents to choose options which involve building on the Green Belt, by saying *“large-scale development on Green Belt generates the money and land that provides new infrastructure like roads, schools, shops and parks”*. However it does not say that such new infrastructure will solely or predominantly support new residents but will do nothing for existing severe infrastructure deficits, which are being exacerbated by the existing rate of new building. Nor does it tell respondents that some of the eight Green Belt “broad locations”, including both NW Harpenden and NE Harpenden, will not provide any strategic infrastructure.

The comment that *“the government now says we should build 913 homes a year”* is completely wrong. The 913 homes a year figure is a proposed figure of something which is called “objectively assessed need” but is really a measure, in large part, of housing demand.

The government does not say that we should build that amount of housing. On the contrary, it says that the Council should follow the National Planning Policy Framework which makes quite clear that local authorities are not required to meet all of their “need” figure where, as in St Albans, that would require release of Green Belt. Green Belt must only be released in exceptional circumstances, and caselaw states unequivocally that the mere fact that the “need” figure is greater than the amount of housing which can be built on non-Green Belt land is not an exceptional circumstance.

The Green Belt was created in order to resist pressure for development in places where that pressure is most keenly felt. It is entirely perverse to say that we must release Green Belt because people wish to come and live in this area, many of them moving out from London.

Moreover, in so far as the figure of 913 homes per year includes true local “need”, the fact is that the housing market in this area is such that there is no correlation between the people who need the housing and those who will buy it once built. Our housing market is dominated by people moving out from London. New housing in particular will attract more buyers from London: it will not go to locals in true housing need. Non-market social housing is subject to right to buy and right to acquire and will be on the market in a short period of time.

To explain the “scores” and “emojis” we have assigned to the options in this question:

We consider the best option is to add more homes into existing built-up areas. This places new housing close to town centres with their shops, transport and other facilities, increasing the number of walked or cycled journeys. Care will be needed to avoid over-densification and to preserve character, particularly in conservation areas, but with proper planning it is possible to build more in our town centres and villages.

We consider the worst option is to build on the 8 areas that have been identified in the Green Belt Review. This is because the Green Belt Review is seriously flawed, as we explain further below.

Of the remaining options, whilst we do not welcome any building in the Green Belt, we consider that the best is the creation of “garden villages” of 1,500-10,000 homes. Settlements of this size are large enough to be properly planned with their own infrastructure and transport networks. Indeed, the consultation document should have also asked for

respondents' views on the option of the Council working with other Councils to create a "garden city" to accommodate the "need" of a number of districts.

We do not support expanding existing villages or towns into the Green Belt. Such growth places an undue burden on existing infrastructure and lengthens journeys from the outskirts of towns, increasing the use of the private car. However, we recognise that there may be some locations where expanding a village may create the critical mass which would support village facilities such as pubs and shops.

Build the Right Kind of Homes

Q4: Enter the numbers 1 to 8, where you think 1 is the most important and 8 is the least.

Q5: Circle how you feel about each kind of housing being built.

Social rented housing	2	(smiley face)
Affordable rented housing	3	(smiley face)
Part-buy/part-rented housing	6	(neutral face)
Small first-time buyer flats	7	(sad face)
Small/medium sized family homes	5	(neutral face)
Homes for people downsizing	1	(very smiley face)
Homes for older people	4	(smiley face)
Self-built homes	8	(sad face)

Please add any other comments:

We think that the Council should be guided by evidence of local need. In particular, it should recognise that there may be different needs in different places across the district: the housing which is most appropriate in St Albans may not be as appropriate in Harpenden or the villages. We do think it is particularly important to build homes for older people downsizing, as this frees up existing family homes for younger people.

Provide local jobs

Q6: Circle how you feel about this approach to local jobs. (neutral face)

Protect the Green Belt

Q7: Circle how you feel about this approach to identifying potential land for building in the Green Belt.

(very sad face)

Please add any other comments:

The Green Belt Review is seriously flawed. It is readily apparent to the careful reader that the approach taken did not provide a robust method of identifying the areas of Green Belt which perform least well against the 5 national and 1 local purpose, for the following reasons.

- (1) First, the areas of land which were eventually identified and ranked at the end of Part 2 of the Review are the result of division, sub-division and sub-sub-division. The process starts with the large parcels assessed in Part 1. Only parts of those large parcels are taken forward to Part 2. In Part 2 these smaller parcels are again sub-divided and the even smaller parcels are then ranked.
 - (a) This process of concentration on ever smaller areas of land has resulted in parcels of Green Belt which are no longer of a size to be considered truly strategic. A number of the sites, including NW Harpenden (Site S5) and NE Harpenden (Site S6), are too small to be able to provide any strategic infrastructure. Moreover, the process has deprived the Council of considering any strategy other than urban extensions: none of the parcels would be large enough, for example, to accommodate a new settlement. Thus reasonable alternatives were not considered.
 - (b) Further, some of the eight areas identified by this process are not substantially larger than some of the "sub-scale" areas identified in Part 1. However, there has been no evaluation of the sub-scale areas against the sustainability criteria against which the "strategic" areas have been scored. The two kinds of site have been treated as conceptually different, when they are not.
 - (c) A further consequence of this repeated sub-division is to result in areas of land of a size unlikely to be able to demonstrate that they fulfil all five national and one local Green Belt purposes to the fullest extent. That is because no area of Green Belt land, when cut down to a sufficiently small size and assessed in isolation from the land around it, is likely to be able to do so. Despite that, the sites eventually ranked perform well against Green Belt purposes: for example, NW Harpenden (site S5) and NE Harpenden (site S6) contribute significantly towards the Green Belt purpose of safeguarding the countryside and make a partial contribution towards the preservation of the setting of historic towns. They both, of course, also significantly contribute towards the unassessed purpose of assisting regeneration.
- (2) Secondly, in Part 2, the eight "strategic" areas were not compared with each other. Rather one part of each area was compared with the other part or parts of that same area. For example, the West part of S1 was compared with the East/North part of S1, but neither the whole nor any part was compared with S2, S3, S4 etc. The Green Belt Review wrongly assumes that part of every site must be released from Green Belt, but that the whole of any site could not be. Each comparison reaches the conclusion that the area closest to an existing settlement is the "best" for development. This is hardly surprising. In circumstances where the areas assessed are not large enough to accommodate a new settlement, it would be a very odd conclusion to draw that it was better to release from Green Belt a parcel of land which was not adjacent to an existing settlement, in preference to one which was. As a consequence the Green Belt Review does not properly consider all reasonable alternatives. It does not

consider, for example, whether it may be better to use, for example, the whole of S1 but not any of S2.

(3) Thirdly, the comparison between parts of strategic areas conducted in Part 2 was made on the basis of landscape/visual sensitivity characteristics, not Green Belt purposes. This is to confuse quite different things. It is therefore, not possible to be sure that the same parcels would have resulted from an assessment which only considered Green Belt purposes. One of the consequences of selecting sites by reference to landscape/visual characteristics rather than Green Belt purposes is that the boundaries of the areas identified do not comply with NPPF paragraph 85, in that they do not follow existing features on the ground.

We query the accuracy of the comment that “*many of our homes in the District were built in the Green Belt from the 1950s to the 1980s*”, a comment which is clearly designed to encourage respondents to support building now in the Green Belt. It is our understanding that when the Green Belt was first designated in this area in the 1950s, large-scale development was planned for at the same time, i.e. much of the development which took place in the decades thereafter was on land which was not Green Belt.

Protect our historic buildings, wildlife sites and areas of natural beauty

Q8: Circle how you feel about protecting these things.

Historic streets and buildings	(very smiley face)
Wildlife sites	(very smiley face)
Areas of natural beauty	(very smiley face)

Get the transport, schools and other infrastructure we need

Q9 Enter the numbers 1 to 8, where you think 1 is the most important and 8 is the least

What kinds of new infrastructure do you need in your area?

We refuse to rank these different types of infrastructure. It is obvious that we need all of them. There is a serious recognised infrastructure deficit across Hertfordshire, with the consequence that existing residents are insufficiently supported, let alone the thousands of new residents who would be encouraged to move to the District from elsewhere, particularly London, if 913 new homes were built every year during the plan period. In Harpenden we would say:

- Traffic congestion is bad and getting worse. This is a significant quality-of-life issue.
- Car parking in the town centre has reached crisis point.
- The supermarkets, particularly Waitrose, are too small for the existing population.
- Existing cycle facilities, other than the Nickey Line, are poor, ill thought-out and inadequately maintained.
- There is considerable pressure on GPs and other healthcare facilities.