

HARPENDEN GREEN BELT ASSOCIATION – RESPONDING TO THE CONSULTATION

Some members have asked us for help in answering the Council's questions in a way that will most strongly protect Harpenden against over-development, save its Green Belt and seek to ensure that any new housing is supported by proper infrastructure.

The purpose of this sheet is to give you a few ideas about the kinds of responses you might make to the consultation questions. But it is really important that **you** express **your** thoughts on these important issues. If the current plan goes through, you won't get another chance for 20 years! So we would encourage you to find out as much as you can about the issues raised before you give your response.

We've set out below where you can get additional information which might help with specific questions.

Remember too, that your answers will count for more if they are **expressed in your own words** and are **backed up by evidence**. So try not to “cut and paste” if you can help it.

How to respond to the Consultation

The questions on which your views are being sought are contained in a “Summary Booklet”. A copy of this, and the formal draft Strategic Local Plan, is available on the HGBA website, <http://www.harpendengreenbelt.org.uk/>.

You can give your responses:

1. Online at www.stalbans.gov.uk/slp. You will need to register before you can answer the questions. Click on “Draft Strategic Local Plan Consultation 2014” and scroll down to “Read and comment on Document”.
2. By printing out the Summary Booklet on the HGBA website: <http://www.harpendengreenbelt.org.uk/>, filling it in and sending it by post to St Albans Council Offices, St Peters Street, St Albans, AL1 3JE.
3. By picking up a copy of the Summary Booklet at the Town Council's offices or Harpenden library, filling it in and sending it by post to the address above.
4. By email to planningpolicy@stalbands.gov.uk
5. By writing to St Albans District Council at the address given above.
6. By telephoning St Albans District Council on 01727 819396.

REMEMBER TOO to let your District and Town Councillors know your views. You can find the right one to email at www.harpenden.gov.uk/councillors.

SUGGESTED RESPONSES TO THE QUESTIONS IN THE SUMMARY BOOKLET:

1. Economic Development

The question asks:

Whether you agree with the approach set out, including that “new housing in the district supports economic growth”.

Suggested response:

DISAGREE.

Economic growth is obviously an important consideration but we question whether massive house-building projects ensure sustainable long term growth, particularly if the houses are built without adequate infrastructure. Houses first and infrastructure next (or never) is very likely to be what will happen, given the dire state of the UK’s public finances. Developers would not finance a bypass for Harpenden, for example, and neither would central Government.

The Government has not put in place a strategy that spreads economic development to places that need it in the UK, with the result that the South East stands the risk of grinding to a halt with over-development.

In the case of development on Green Belt, such land is by its very nature on the fringe of villages and towns. It would be better if new housing was built within existing towns and cities, close to where people work, or in places where it could be supported by new infrastructure, including roads, railways, schools, doctors’ surgeries, etc. Building homes on the edge of Harpenden without proper supporting infrastructure will disadvantage existing residents and not boost the local economy. 500 homes may bring 2,000 extra shoppers into our High Street shops, but where will they park in central Harpenden?

2. Housing Need

The question asks:

Whether you agree with the approach set out, which is that the plan is based on a figure for housing “need” (really demand) of 436 dwellings per year for 20 years, coming in total to 8,720 dwellings.

Suggested response:

AGREE.

I do not agree with the statement that “an annual average provision of 436 new dwellings would meet full need”. The independent study is not concerned with measuring “need”, it is only concerned with measuring “demand.” In a place like Harpenden, there will always be lots more people who want to live here than we can accommodate. These people cannot be described as “needing” to live here.

I agree however that taking a measurement of the District’s population over a 10 year period is likely to be more accurate than taking one over a 5 year period.

More Information:

You can read the Housing Needs Assessment and Strategic Housing Market Assessment at

http://www.stalbans.gov.uk/Images/SP_EB_SHMA_tcm15-39883.pdf

3. Affordable Housing and Housing Mix/Type

The question asks:

Whether you agree with the approach set out, which is for a mix of housing types and 40% affordable housing.

Suggested response:

We are not suggesting any particular response to this question.

4. Housing Development Options

The question asks:

Whether you agree with:

Option 1 – keep our Green Belt as it is

Option 2 – build on some of the Green Belt, but not as many houses as proposed in the draft plan

Option 3 – build 4,000 homes on Green Belt, as proposed in the draft plan

(NB: The Council say in the question that they are proposing 4,000 homes on Green Belt, but the true number is 4,500, as they are also planning for 500 homes on “minor” Green Belt sites such as behind Falconer’s Field and at Beesonend Lane in Harpenden)

Suggested response:

OPTION 1.

I VERY STRONGLY AGREE with Option 1, to keep the Green Belt boundaries where they are.

The Green Belt is a very valuable part of the District and helps to give Harpenden its particular character. It is part of the reason why so many people want to live here. We do not want Harpenden to become part of Luton or look like North London.

Recent Planning Guidance from the Government says that Councils should act to protect Green Belt land in their local plans and that Districts with Green Belt do not need to meet their housing quota in full. The Council’s proposals fly in the face of that advice.

The Council itself commissioned a report in 2012 on the environmental capacity of the District. It concluded that “*There is overwhelming quantitative evidence that the current level of urban development in St Albans is unsustainable...*”. The report recommended that “*it would be unwise to permit further urban development in the District on undeveloped land.*” The Council’s proposal to build 4,500 new homes on the Green Belt ignores the findings of that report.

The Council is also ignoring the cumulative effect of all the proposed changes to the Green Belt, both in the District and outside it. Harpenden is likely to be significantly affected by the proposed 2,500 houses near Redbourn, which are likely to have a major impact on Harpenden as people from Redbourn use Harpenden’s train station, shops and their children come to Harpenden schools. Neighbouring districts such as Luton, Central Bedfordshire, Welwyn, Hatfield and Dacorum are all planning significant new building on the Green Belt. This will produce massive numbers of cars on our already congested roads, people on our overcrowded trains, and put schools and other infrastructure, as well as our environment, under increasing strain.

The “Hertfordshire Guide to Growth – 2021” is another report looking at how new housing should be provided in the County. It recommended that the best place for new housing was within walking distance of rail stations. The second best was to build a new garden city. The Council’s current proposals also ignore this report.

The country needs new homes but it is not sensible to keep extending our towns and cities by building on the Green Belt at their edges. This just makes it more likely that people will drive to work or to other facilities in our town centres, and means that people living in town centres also have a long car journey to reach open countryside. It is more sensible to concentrate new homes in existing urban areas, so that they can be located near to where people work and are close to shops, railway stations, etc. There are also lots of empty homes around the country. If new homes need to be built on green fields, they should be built in new towns and villages beyond the Green Belt which are properly supported by infrastructure, rather than tacking them onto existing places and adding to road congestion, parking problems, overcrowded railways, lack of capacity in schools, etc.

St Albans District Council should be spending less of its energy trying to build on the Green Belt and more of its energy trying to find ways of building more homes on brownfield land. Why hasn't it commissioned an independent report to see if it can build more homes in a sustainable way within existing towns and villages, instead of on the Green Belt?

The Council should also be working with other authorities with Green Belt in their areas to explore opportunities for properly-supported new towns and communities beyond the Green Belt. By building on Green Belt, it is taking the easy option which is not in the long term interests of the District or of the country.

More Information:

You can read the Environmental Capacity Report at

<http://www.harpendengreenbelt.org.uk/Environmental%20Evaluation.pdf>

You can read the Hertfordshire Guide to Growth – 2021 at

<http://www.harpendengreenbelt.org.uk/Hertfordshire%20Guide%20to%20Growth%20-%202021.pdf>

5. “Exceptional Circumstances” for Change to Green Belt Boundaries

The question asks:

For your views as to whether there are “exceptional circumstances” and what choices the Council should make about building on Green Belt.

Suggested response:

I VERY STRONGLY DISAGREE that there are exceptional circumstances which justify taking land out of the Green Belt. The District has always been a popular place to live so it is not “exceptional” that lots of people want to move here from elsewhere.

The Council’s own independent evidence, the Housing Needs Assessment and Strategic Housing Market Assessment, shows that demand for housing in the District is an *“unstoppable force’, an example of a housing market in which the exercise of demand will always exceed supply and will arise from well beyond St Albans’ boundaries.”*

This report also demonstrates that even if we build all these houses, they will not go to meet local needs. The consultants carried out a study of a sample of newly-built homes and, by looking at Council tax registrations, worked out whether the people who came to live in them were from within the District or outside it. They found that the number of people from outside the District outweighed those from inside it by a ratio of 10:1 – i.e. for every 11 new homes built, only one was going to a local person or family.

It is therefore clear on the Council’s own evidence that newly-built homes on the Green Belt will simply encourage further demand from people outside the District. In those circumstances, even if the demand is “exceptional”, it does not justify changing Green Belt boundaries to meet it.

I believe the Council should leave the Green Belt boundaries where they are. I refer to my comments in section 4 above.

More information:

You can read a note about the legal meaning of “exceptional circumstances” at <http://www.harpendengreenbelt.org.uk/Green%20Belt%20policy%20-%20exceptional%20circumstances.pdf>

You can read the Housing Needs Assessment and Strategic Housing Market Assessment at http://www.stalbans.gov.uk/Images/SP_EB_SHMA_tcm15-39883.pdf

The quotation above is from ES 32; the study referred to above is described at paragraphs 2.26 – 2.27.

6. Green Belt Review and Development Strategy

The question asks:

Whether you agree with the approach of the Green Belt Review, carried out by consultants for the Council.

Suggested response:

STRONGLY DISAGREE.

The Green Belt Review did not do what it was supposed to do. In particular, it confused Green Belt issues with other planning issues, such as landscape character.

More information:

You can look at a Powerpoint slideshow setting out HGBA's views as to why the Green Belt is flawed at

<http://www.harpendengreenbelt.org.uk/HGBA%20-%20What's%20Wrong%20with%20the%20Green%20Belt%20Review%2012.10.14.pdf>

You can read the Green Belt Review itself at

Part 1:

<http://www.harpendengreenbelt.org.uk/Draft%20Initial%20Evaluation%20of%20Green%20Belt%20Strategic%20Sub%20Areas.pdf>

Part 2:

<http://www.harpendengreenbelt.org.uk/Green%20Belt%20Review%20Part%202.pdf>

<http://www.harpendengreenbelt.org.uk/Green%20Belt%20Review%20Part%202%20errata%20sheet.pdf>

7. Development Sites

The question asks:

Whether you agree with the approach the Council has taken to selecting the Green Belt sites to use for housing.

Suggested response:

STRONGLY DISAGREE.

The various sites were not accurately, fairly or consistently evaluated.

The Council was wrong to score the sites on traffic and access grounds without speaking to the local highways authority, Hertfordshire County Council.

It is wrong of the Council to have given the NW Harpenden site the highest score (best for development) on traffic and access grounds. There are serious problems of congestion on the Luton Road and the roads around the site are narrow country lanes.

The problem of congestion is going to get worse with the expansion of Luton airport, the building of thousands of new homes north of the District as well as the planned new houses in the District.

The NW Harpenden and NE Harpenden sites are said to be within walking distance of local facilities. The Council has not properly measured these distances. I do not believe that people living in new housing on either site would be likely to walk to Harpenden Town Centre or the railway station as they are too far away.

We have a huge shortage of school places in Harpenden and the surrounding villages and the Council's evaluation of the Harpenden sites does not properly take this into account.

Also, the Council took no account in scoring the sites of how well they fulfilled Green Belt purposes. The Harpenden sites were amongst the most important for the Green Belt of all the sites looked at, but this is not reflected in the choices made about which sites to take out of the Green Belt.

More information:

You can look at a Powerpoint slideshow setting out HGBA's views as to why the sites evaluation is flawed at

<http://www.harpendengreenbelt.org.uk/HGBA%20-%20What's%20Wrong%20with%20the%20Sites%20Evaluation%2012.10.14.pdf>

You can read the officers' report setting out the evaluation at

<http://www.harpendengreenbelt.org.uk/Officer%20Report%20to%20Planning%20Policy%20Committee%20on%20evaluation%20of%20Green%20Belt%20sites.pdf>

8. Housing Density

The question asks:

Whether you agree to the approach set out, which is for dwellings to be built at a density of 40 dwellings per hectare, with 40% of the land set aside for infrastructure and open space.

Suggested response:

DISAGREE.

I accept that if the country is to limit building on green fields, it will have to build more densely than has sometimes been the case in the past. But I am concerned that the proposal to build at 40 dwellings per hectare crams in homes at a much higher density than the surrounding areas and will be out of keeping for these suburban sites at the edges of our towns.

It is suggested that if a lower density figure is adopted, it will be necessary to build on more Green Belt sites. This is not correct. The District Council is not obliged to build 4,500 homes on Green Belt. It can reduce the number of homes and build at an appropriate density without building on more Green Belt sites.

I am also concerned that the District Council is proposing to build at even higher levels of density in NW Harpenden, because it cannot fit in 500 homes as proposed at the density of 40 dwellings per hectare. The housing estate would be totally out of character with the rest of North Harpenden and resemble a “carbuncle” on the edge of our town.

9. Infrastructure

The question asks:

Whether you agree with the approach to infrastructure set out.

Suggested response:

STRONGLY DISAGREE.

The Council has not complied with its duty to assess the quality and capacity for infrastructure.

It did not even speak to the Highways Authority before scoring the sites on highways grounds.

It has made no evaluation of the ability of our roads to cope with the additional cars, let alone what the impact will be of the expansion of Luton Airport and of lots of new housing to the north of Harpenden.

It has not considered how parking in Harpenden will be affected by new housing.

It has not considered the ability of our trains to cope with the additional people.

It has not properly considered how many new schools would be needed to address new housing: in particular, in Harpenden it has not even looked at how it would provide new secondary school places for the children of the new housing.

It has not given sufficient thought to sites for new primary schools and how those sites might be accessed.

It has not considered the capacity of doctors' and dentists surgeries and other healthcare and social services to cope with the growth in population.

It has not considered the impact on our water supply, waste water and its treatment – in circumstances where Hertfordshire as a whole has acute water supply problems.

It has not considered whether our telecommunications and other utility services have capacity to cope with increased demand.

The five bullet points in the Local Plan do not fulfil the Council's obligation to "set out the strategic priorities of the Council for delivering this infrastructure": most of them are not concerned with infrastructure at all.

The "Hertfordshire Infrastructure and Investment Strategy" shows that the County has a historic infrastructure deficit of £2.41 billion.

On a local level, Harpenden's roads are heavily congested and there is no chance, if only for financial reasons, of a bypass being built. More traffic will cause gridlock in our Victorian pattern of streets. There is already a crisis in school capacity in the Harpenden area and the villages, on the basis of the existing population, let alone the children who would live in 500+ additional dwellings. GP surgeries have 55,000 people on their books; the surgeries are constrained in terms of further expansion and have a high proportion of very young and elderly.

On a wider level, the Council needs to consider the impact on our infrastructure of all the proposed building elsewhere, both around the District and in other areas. Harpenden is particularly affected by what happens in Redbourn, and over the border in Central Bedfordshire and Luton.

I INSIST that the Council should not allow 500+ additional dwellings to be built in Harpenden without adequate infrastructure to support them.

More information:

You can view Harpenden Town Council's submission to the District Council on the evaluation of the Harpenden sites, which includes material on infrastructure capacity, at

<http://www.harpendengreenbelt.org.uk/HTC%20Letter%20to%20SADC%20June%202014.pdf>

The Harpenden Urban Transport Plan 2011 is at

<http://www.harpendengreenbelt.org.uk/Harpenden%20Urban%20Transport%20Plan%202011.pdf>

The Hertfordshire Infrastructure and Investment Strategy is at

<http://www.harpendengreenbelt.org.uk/Hertfordshire%20Infrastructure%20and%20Investment%20Strategy%20-%20Final%20Technical%20Report%202009.pdf>

10. Other Policies

The question asks:

For comments on the other parts of the draft Local Plan.

Suggested response:

We are not suggesting any particular response to this question. Have a look at the draft Local Plan on the HGBA website and make any comments you feel appropriate.