



WELWYN GARDEN CITY SOCIETY

www.wgcsoc.org.uk

Planning Policy
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts
AL8 6AE

19th March 2015

Dear Sirs,

Response to the consultation on the proposed local plan.

Introduction.

This response is split into three sets of comments:

- Specific comments relating to Welwyn Garden City; and
- Those relating to the preparation of the plan and the means used to communicate it to residents; and
- More comments upon the generality of the plan itself.

General background to our submission.

The Society is well known to the Council which consults with it on many issues when it feels it should. So, for example it consults with the Society on issues such as the “Estate Management Scheme”, shop fronts in our Town Centre, many aspects of planning, and many others. It is notable that on the issue of this local plan the Council has not sought to engage with the Society at all. Nor have any Councillors.

Specific comments about Welwyn Garden City.

Welwyn Garden City is the second garden city in the country and is known throughout the world as a key milestone in the development of urban planning. The garden city movement and the town’s iconic plan for the town are covered in all architectural courses world-wide.

In this context, one might have thought that the Borough Council would have at least considered the local plan with this in mind. It has a pearl within its domain and one might reasonably have thought that they ought to bear this in mind when considering the way forward for the town and the Borough.

We quote from Welwyn Garden News, edition number three and published on 14 October 1921.

“The significance of Welwyn Garden City is not merely that it is the second town of the garden city type to be established, but that it is the first that has a direct bearing upon the future growth of London. Letchworth is the original example of a garden city, started to show the world what was meant by a self-contained town designed in relation to the countryside. The achievement of Letchworth has been remarkable, and its influence has been, and undoubtedly will remain, great. It is evidence of the vitality of the garden city idea that the second town, which we have at Welwyn, should not be a mere imitation of the first, but should show the idea in a new connection. All new towns, of course, derive something from old towns; even Letchworth, though it contained a fresh conception of town life, has been influenced by and gained its support from other towns. But Welwyn Garden City is well within the London sphere of influence, and is being carried out with the definite object of providing an alternative to the suburbs. The old method of town expansion was to add suburb to suburb in constant succession. Along the great North Road out of London we have St. John’s Wood, Hampstead, Finchley, New Barnet and Potter’s Bar. That process continued for a generation or so, and becoming more and more solid, would bring London up to Hatfield and beyond. What a prospect for those who love towns and also have delight in the real country! Yet that will inevitably take place unless an alternative is shown to be practicable. To provide that alternative is the reason for the existence of Welwyn Garden City.”

This article that appeared nearly one hundred years ago is still so apt that the Society’s prime objection to and comments on the proposed Local Plan are set against this extract and Section 52 of the National Policy Planning Framework (NPPF), which is the centrepiece of the current government’s new planning laws, which read as follows:

‘The supply of new homes is sometimes best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.’

Did our own Borough Council reflect on this matter before embarking on its chosen route? We think not. Should it have done so? We think it should. Why? If one of the only two local authorities in the country with a fully-fledged garden city within its domain cannot even think of replicating the garden city approach elsewhere, then the future is suburbs that simply grow endlessly.

The Borough Council’s proposed Local Plan includes a settlement strategy which states, ‘The primary focus for new development being in and around Welwyn Garden City and Hatfield’.

The principle of the garden city has never been to add suburb after suburb as the 1921 article makes clear. The NPPF is also clear; the garden city ethos has merit for town planning in the 21st century. However, the Local Plan being promoted in the current consultation fails to consider these important points. Garden city principles do not include building vast

extensions on the periphery and infilling vacant space with housing within the interior. Unfortunately that is the proposal we are being saddled with.

The internationally recognised success of the town and the esteem in which it is held by those who live here does not appear to be reflected in the Borough Council's vision for how the town should evolve over the next fifteen years. The NPPF could be used to underpin the unique identity of Welwyn Garden City.

The Council's proposals are a massive indictment of its bureaucratic approach to planning and to framing its desired outcome of avoiding the placing any significant development in or around its southern villages.

The need for additional housing:

It remains unclear why the borough needs so many new homes. When the last East of England plan was in place this Council fought the imposition of some 10,000 additional houses by the East of England bureaucracy and won its action at the High Court. Now this same Council is stating that it requires some 12,500 new homes. We have not had any reconciliation between the apparent new need and the original one of around 7,500 or thereabouts.

We have sought to undertake reconciliation ourselves but have not been able to do so. You would have thought that the Council owes an explanation to its residents about this but none has been forthcoming. Councillors have only been able to say that the plans are not comparable, that the plans cover different periods and/or that it is as a result of different but unspecified assumptions imposed on it by central government. We would have thought that a proper explanation of how this difference arises is warranted. In the absence of this, there is now a widespread belief that the higher number of homes stated as "needed" arises from a wish to increase Council income rather than any objectively assessed need.

In particular we understand that the housing need for this Borough comes as part of an overall need for a larger area prepared as part of a series of needs assessed for different Councils. We think that the need assessed for this Borough is so different from what it was when last seriously measured that some amount of double counting has taken place. Quite apart from anything else, we do not understand how we should be asked to accept a statement of housing need when its method of calculation is so arcane and/or indeed unknown.

There must be some doubt about the accuracy of any housing assessment if the need for housing in different parts of the County has been prepared by different groups, on different basis and at different times. It is unlikely to be unlikely to be accurate.

Employment land.

The Council has also indicated that there is a need to plan for some 12,000 new jobs in the area. Again, we are unconvinced at this figure since we do not understand how it is arrived at or on what evidence it is based. If it is correct, then we find it even harder to believe that there is no need to provide for any additional employment land. Again, there is no evidence to support this. We find this "hoped for" scenario as not credible.

The logic of what the Council is stating is that, whereas there is a need to use Green Belt land to cover the additional housing need, no green belt land will be used for additional employment land. It is hoping that this additional employment can be accommodated within brown field land or current earmarked employment land – however, according to this plan; both Brownfield land and some employment land are already earmarked for housing. This does not seem to have been properly taken into account.

Strangely, the loss of employment land for housing following the change in permitted uses of office building does not seem to have been properly allowed for in the calculation of “windfall numbers” of houses within the Borough. This also will make it still more difficult to meet the intended target of 12,000 new jobs in the Borough and this does not seem to have been considered.

Development sites chosen around Welwyn Garden City.

We have comments on three areas chosen for development

HAT1. We are opposed to the building on this site or that area beside it marked as “land promoted for housing”. Clearly the first phase would bring Hatfield and Welwyn Garden City closer and when the “land promoted for housing “ is next reviewed in a subsequent plan, the so called Green Belt would be so compromised by then that the defence of the remaining area between the two towns would not be possible. This ought to be resisted on the grounds that, if the Green Belt is to mean anything at all, then the two towns do need this space to safeguard their own identities.

WGC4. This area is again cited as one ripe for development. However, no regard is being given to its impact on the town or how residents would relate to the town centre – which is some three miles away. It has already been ruled as inappropriate for housing development by another inspector at another time and we are at a loss to understand why it has come forward yet again as appropriate for housing. In addition, its potential relationship with any new housing proposed by the East Herts District Council does not appear to have been taken into account.

As it is, the infrastructure supporting this area is already fragile. In particular, the Moors Walk area fails to support the existing numbers of people and housing. It is already very difficult to find any parking space in that area at any time of the day in the week. So how it is expected to cater for the additional number of residents from some 700 new houses begs an answer that has so far not been given.

The Council has also indicated that a Traveller community be located in WGC 4. This will be unsatisfactory for both the traveller community as well as new residents in the area: The former will not be near any bus route and circumscribed by residential housing while the latter will find it difficult to obtain finance to acquire properties in that area with a traveller community so close by.

WGC5. This land was previously stated to be poor quality. However, it is apparent that when seen from the south it is an open fielded area that runs down from north to south. Any building on that area will be very visible from the south. This will break a key characteristic of the town: namely it is not really visible from outside as it masked by trees or built hidden behind the crests of rising land.

In addition, any building on this site will break the “green corridor” that is apparent from Hertford through to St Albans and taking in Panshanger Park, the Hatfield House estate as well as Ellenbrook, Stanborough park, etc.. This corridor is now so precious that it ought to be safeguarded. No significant discussions appear to have taken place with East Herts District Council relating to their proposal to erect a significant development south of Panshanger Park. The effect of both these developments will significantly harm this green corridor.

There is an apparent site of some 300 homes on the Gosling Stadium site. When approached, a Stadium trustee said that this would be very complicated to deliver. Further, it is unclear if the land in question has actually been offered for development. If it has been offered, we should like to know who has done so. Further, in view of the possible likely number of homes on this site, it would be helpful if the Council elaborated as it is unclear even where it is or the infrastructure need to access it. Again, the Society would wish to be certain that the Stanborough playing fields, access to them and students at the school not being compromised.

The claim to a more dispersed and proportional distribution of development.

Following an outcry over the original strategy proposal the current attempt is prefaced with *“The policy intentions now provide for a more dispersed and proportional distribution of development across the towns and villages which should enable local needs to be met”*.

The Society does not think that even these stated objectives have been met.

The Objective Assessment of Need (OAN) has been calculated on a proportionate basis. It is interesting to look at the difference between the OAN and the Borough calculation of potential sources of housing supply for each of these areas.

AREA	OAN	Total proposed (TP)	% TP/OAN
WGC	5600	3663	65%
Hatfield	3820	3774	93%
Woolmer Green	160	150	93%
Oakland Mardley Heath	340	73	21%
Welwyn	420	176	41%
Digswell	180	9	5%
Welham Green	360	420	116%
Brookmans Park	380	53	14%
Little Heath	140	181	130%
Cuffley	500	193	39%

Welwyn Garden City, Hatfield, Woolmer Green, Welham Green and Little Heath show the high percentages whereas the politically protected villages do not nearly meet the OAN.

Further examinations of the various areas suggest that the reasons cited do not appear to be consistent between areas. Sometimes the impact of change to the rural scene is important as in the case of Brookmans Park finely balanced sites; in others such as WGC4 it is not.

Neither does there appear too much indication that the Sustainability Appraisal has been rigorously applied. A number of politically protected villages with good rail connections have been ignored, and as a result Cuffley, Brookmans Park and Digswell all have low success in finding a potential supply of new housing.

Equally, there is considerable talk about building well-balanced communities, but where the opportunity to correct social imbalance is possible none is taken. You could guess where the Gypsy & Traveller sites would be placed in either Welwyn Garden City or Hatfield even before reading the report.

The Society believes that the process has been engineered to arrive at a desired outcome rather than impartially in the interests of the Borough as a whole.

The preparation of the plan and how communications with residents have taken place.

Summary:

No one but the Cabinet and some elected Councillors can be pleased at how the process of the preparation of this plan has taken place. The process used has been difficult to understand, laborious, and little attempt has been made to really engage with residents. By “engage” with residents, we are not aware of any dialogue between residents and plan makers taking place where good ideas from residents have been taken aboard, evaluated and then incorporated into the final plan. Rather, we have seen the proposals put forward and then defended as being the only option that is possible.

In other words, submissions have been made but there is no evidence that, apart from noting them down, any real account has been taken of them.

Communications between residents and with the Cabinet and Councillors during the period of the plan preparation has been poor.

Originally, the communication of the plan was set out in a document called “Statement of Community Involvement” (SCI). Its final version was published in December 2012. We do not think this has been followed.

Examples in support of this summary follow:

The SCI states in section 3.1: *"There are many individuals, groups and organisations in Welwyn Hatfield who will be given the opportunity to be involved in the preparation of planning documents and to comment on relevant planning applications."*

This was the plan but there is no evidence presented to say that this part of the process has been followed. There is widespread ignorance of the proposals and the experience of engaging has been found to be a wholly negative experience for many.

Section 2.2 of the SCI states: *"the council has developed an electronic database of consultees to involve at various stages of the plan making process. This list is not fixed and those who wish to be consulted can be added to it."*

It is unclear how this database has been used. Certainly, it is of no use in accessing those who do not have computers for a start. So it is also unclear how representative this database actually is.

Even those who are familiar with computers find the process suggested to communicate with the council difficult and would rather write a letter to set out their views. This is indeed our own approach.

Section 3.8 of the SCI states: *"Equally, It is very important that the wider community-people who live, work, run businesses and study in the borough – are consulted. Members of the public who would like to be notified about planning consultations and the progress of documents can add their details to the consultees electronic database."*

In Issue no 48 of the WH Life, the Council's quarterly magazine issued to residents, there is a statement that the local plan is being prepared and how residents can keep up to date with proposals therein but it seems to imply that everyone will have access to a computer. Further, there is no written indication of how anyone else, not on email, can obtain details as to how the proposals will affect them.

In Issue no 49 of the same Council document, there is more detail of the local plan. However, there is still no explanation as to how either someone with a computer or not can access the information so as to understand what exactly is being proposed. It indicates that the Council is planning for growth and we comment on this statement at a later point in this submission. It refers to some 12,500 additional houses.

These words within the SCI are laudable but the Council have failed to explain what is being proposed in its plan. They merely say that people can be consulted but there is no suggestion as to how it might impact the recipient. So, for example, in the very latest example of the Council's WH Life magazine (Issue no 50), the local plan is referred to and the amount of information given is so sparse that we submit it is misleading. It fails to explain the totality of what is proposed. It refers to some 5,170 homes that might have to go on the green belt but fails to say that the bulk of the development will be placed on WGC and Hatfield. It does not say how this number relates to the preceding figure of 12,500.

One might surmise from this presentation that the varying sizes of blobs on the map might refer to varying number houses but these blobs are not referenced nor are they indicative of the areas to be impacted. Rather the amount of space that will be taken from the green belt is dismissed as an insignificant 2% of the total borough: this is hardly insignificant or material to, say, the people of Panshanger, Welwyn Garden City or Hatfield. We suggest that all these parts of the Borough will be significantly adversely affected and this is far from clear in this bland communication.

Moreover, there is the extraordinary assertion that removing large areas of Green Belt land will actually enable better communication within the Borough and facilitate access to the Green Belt (See page 7 of the Summary and Guide to the Local Plan consultation Document.) We suggest that this takes us into the world of Alice in Wonderland where words mean what you want them to mean. It is manifestly misleading.

Whilst there have been some presentations around the Borough of what is proposed, members of our Society have remarked that Council staff are far from happy at having to present

details of this local plan to residents and the general impression we have formed is that Council staff lack confidence in these proposals.

It is a pity that Council staff seems to have been unwilling, as have Councillors, to face any audience of residents and be prepared to defend their proposals and to explain how their decisions have been arrived at.

Section 3.10 of the SCI states: *"To inform this strategy a toolkit of best practice for working with community groups is being prepared which will be a useful reference for planning teams before the strategy is complete."*

What tool kit? Does it exist? Was it used? Who is supposed to use it? What does this mean anyway?

Section 3.23 of the SCI states: *"Resources will be targeted to where they will be used most effectively. Workshops and focus groups are resource intensive and will therefore be used where a more considered response is required or where there is an opportunity to consider a topic in more depth to encourage greater participation from particular sections of the community."*

We are not aware of any focus groups or workshops for residents in the formation of this draft consultation. Certainly we have not been involved in any and one might have considered that this Society might at least be singled out for consultation on those parts of the town that would be affected. The Society has been in existence since 1944 after all and is well known to the Council.

No public 'town hall' style meetings have been held by the council regarding their draft plan. The closest residents have come to some form of local engagement was asking questions at the start of some council committee meetings. Indeed, this proved the only way to get any "dialogue" with either Councillors or the Council. Many of these questions were not clearly answered and no right of reply or follow up question was allowed. The questions made no difference at all to the committee voting pattern at these meetings, things seemed to have been decided in advance by the majority of councillors. Evidence of this can be clearly seen in this You tube video shot by the council themselves: <http://youtu.be/lgsaFa4x7qo>

We do not think that any real attempt has been made to engage meaningfully with local residents. These points were made during the last consultation in 2012/13 but this time around nothing has changed at all in terms of reaching out to local residents, despite the new SCI now being adopted. Rather the SCI is seen as a "tick box" requirement of the process but little attempt has been made to do what the SCI requires: namely to really engage- this means listening and then responding coherently.

When residents sought to get a better picture of what was being proposed and to seek to influence the outcome of decisions being taken by Council meetings, they sought to ask questions at meetings of the appropriate Council Committee. What is evident from the minutes of these meetings is how many of the questions were in fact not properly addressed or referred to the consultation phase – when, on past performance, they are then ignored.

The Plan Making consultation table in the SCI states: *"We will consult with the wider community at least once during this stage in the production of the document."*

There is no evidence that the hundreds, if not thousands, of objections from residents in the last consultation regarding the proposals for aspects of the Borough made any difference whatsoever. The plan being presented here for WGC is virtually identical to the last one. How does it motivate anyone to take part in a consultation if the current evidence suggests that any objection they make will be ignored?

It begs the question "What is consultation for?" It is unsurprising that the failure to adequately respond to legitimate enquiries or to take into account their wishes simply turns people off towards the process and indeed towards the political establishment.

Consequently, there is substantial cynicism expressed towards the planning process. There is a widespread assumption that certain parts of the political community have made a decision that is essentially in their perceived local interests rather than in the interests of the Borough as a whole.

Section 4.8 of the SCI States: *"Councillors have a key role to play in plan-making. They are involved in decision-making as plans and strategies are agreed by the relevant planning committee and approved by the council's Cabinet. In addition, the full council must approve Local Plan documents before they are submitted for examination or adoption."*

We are not aware of any of our local Councillors taking any significant role in this process other than to agree with their party leadership. There is no evidence of supporting their community in its desires.

Finely balanced or less favourable sites.

We find the analysis of sites into these categories and their presentation to residents as wholly unsatisfactory and unconvincing.

In particular, we would draw to your attention the decision by the Cabinet, Housing and Planning Panel at a meeting held on 11 December 2014 to move the designation of the WGC4 site from less favourable to finely balanced by resolution of the Committee as wholly inappropriate and out of place with any "evidence based" process. This was against Officers' recommendations.

Again, it should be noted that the Councillors promoting this change of designation were from the very areas that would be least impacted by any development.

The Society would also like to contrast the distance that WGC4 lies from the town centre with the distance that other apparently less favourable sites have to their own town centres and/or to their railways stations.

The outcome from the Council's meetings is that those sites designated as less favourable, whilst being named, are not identified on a map. This means that most people cannot effectively see what is being proposed as the numbers of houses involved is not shown either. The Society sees this as less than open and effectively demanding that residents will have to

undertake their own research to form an opinion. We see this as onerous on residents and partial.

More comments upon the generality of the plan itself.

The proposed plan seems to go against both the NPPF and the directions most recently given by government ministers in relation to the Green Belt.

It is our view that the Council has failed to properly assess the amount of land that is need to meet both housing and employment land requirement before accessing the Green Belt for the remainder. It simply states that there is no need to find any land for employment when the number of jobs to be brought into the Borough is very significant. This is unconvincing without any supporting evidence.

It even falls short of meeting its stated housing requirement without offering any clear explanation of why this is or what the consequences are likely to be. It fails to address the issue that accessing the Green Belt is only permitted for wholly exceptional reasons and its justification that there would be adverse social and economic consequences is not proven as falling into this category.

The Council fails to address the issue that much of its land is within Green Belt areas. Can it actually use such Green Belt areas when as yet it has failed to demonstrate that encroaching on that Green Belt is an exceptional circumstance?

The Council is requiring Green Belt land to fulfil its plan. It states that it must achieve the requirements of the Local Enterprise Partnership but this is not a statutory requirement. This must be balanced against Section 14 of the NPPF where this may only be done where it is consistent with the Green Belt. Perversely, the plan is silent on the use of the Green Belt for employment land but we have already commented that the plan is unconvincing in this regard.

The overall impression generated by this proposed plan is that many aspects of the supporting infrastructure have been ignored. For example, even now as a planning application is awaited for Broadwater Road which will deliver some 850 homes, there is no coherent plan for local school additions and changes that will be needed to meet the increasing demand.

In the past decade or so, we have seen the closure of a number of secondary schools and as yet there appears to be no plan to build any replacements. This is alarming to many schools which are already oversubscribed and have been for many years. This is not in our children's best interests. Equally, it is essential for all schools, current and new, to have adequate sports facilities.

The proposed plan such as it is would see the arrival of up to some 30,000 additional people into the Borough. This is a massive change that is not properly addressed in this plan. The numbers falling on Welwyn Garden City and Hatfield alone will exceed 18,000 whereas less than 3,500 would be allocated to outlying villages. This alone should have prompted Councillors to rethink their plans.

Equally, existing health services including general practices are struggling to cope with demand. Planning for some many new homes in such a small period without considering the

implications for health and care services seems to us to be negligent. It is inadequate to state that this will be dealt with by other authorities when those other authorities are themselves under intolerable pressure already.

Conclusion

It seems to us that Councillors only really considered one option that was designed to safeguard the southern and other villages from significant development. In their first attempt, their plan was justified on the fact that there was opposition from some 4,000 people in the south of the Borough and that it would be “perverse” to place any development in those areas. When this was challenged – namely that there were some 1,000 people objecting to four different sites all within the same area- the Council Leader agreed to review the process indicating that the southern villages would have to accept some more development. That process has now taken place and the end result is more or less the same.

The Society has little confidence in this proposal as it stands and that it will satisfy an independent inspector without significant change. As such, this is very worrying for the Borough as a whole.

If you require more information then no doubt you will contact us.

Yours faithfully
For the Welwyn Garden City Society

S. O'Reilly
Chairman