

NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION HEARING MATTER 10. SITES HT1, LG1 and LG3

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The assessment methodology used to score sites, which has resulted in the selection of sites HT1, LG1 and LG3, is flawed, it ignores or downplays the importance of what is happening in the adjacent **administrative area of Central Bedfordshire**. In area 22 (in the Green Belt Review), the proximity of Stotfold to the northern edge of Letchworth is not scored on a par with the proximity of Hitchin or Baldock to other areas. Site LG1 would bring the boundary of the built up area of Letchworth to within 500m of the back gardens of the first houses in Stotfold, along Norton Road. The draft Local Plan for Central Bedfordshire shows the whole area East of Arlesey up to the Fairfield Estate as zoned for housing. There are 2 major housing schemes under way on the East side of Hitchin Road opposite the Fairfield Estate, which will produce approx 310 houses and 70 apartments. These developments are within 500m of site LG1 and this could result in a merging of Arlesey, Fairfield Estate and Letchworth. The assessment used in the Green Belt Review ignores this.

The second way in which I consider the assessment methodology in the selection of sites HT1, LG1 and LG3 to be flawed, is that there is no weight given to the **heritage value of Letchworth**. Scoring in the Green Belt Review under "preserving the setting and special character of historic towns" is based on views into or out of what are termed "Historic town centres" and these are predominantly the Georgian and Victorian areas of the market towns of Hitchin and Baldock. This ignores the heritage asset value of Letchworth, the world's first Garden City, and Howard's concept of a settlement of a certain size set within a green/agricultural belt with its well designed houses set in gardens and with open green space within the town. The definition of what is of historic or heritage value in the scoring used in the Green Belt Review, is in my opinion, a poorly informed one. Whilst Hitchin and Baldock have Heritage Assessment documents produced, Letchworth has none. English Heritage in their comments on the draft Local Plan in February 2015, said "*...We also expressed some reservations about the further enlargement of Letchworth, which weakens its original Garden City qualities as a compact settlement*". "*It is not clear whether there has been adequate assessment of heritage impacts (the LUC study in 2013 was lacking in this respect), and we again recommend that such assessment occurs. Allocation of the site needs to be justified in terms of historic environment impact*".

I can find no further heritage assessment for Letchworth after this recommendation. An informed heritage assessment for Letchworth would have identified the fundamental importance to the town of its green/agricultural belt, it was an integral part of the design of the town and was one of the first designed Green Belts in the country (Appendix A contains the references to this green/agricultural belt, by Ebenezer Howard and F.J. Osborne). The setting of Letchworth is also relevant for sites HT1, LG1 and LG3, the NPPF definition of setting is "the surroundings in which a heritage asset is experienced".

The Hertfordshire Gardens Trust, consulted by the county and NHDC on landscape and parks and gardens issues, also consider that Letchworth's Green Belt is part of the heritage asset that is Letchworth Garden City, the world's first Garden City.

Hitchin Site HT1

10.9a) I do not consider that the exceptional circumstances have been demonstrated as no planning-led assessment has been made of the District to establish where new development could best be located to comply with NPPF. Only sites put forward by owners/developers have been considered. I consider the scoring systems used to score each parcel of land to be flawed, eg the score based on how many sides of a site adjoin existing development when each site is of a different shape and has a different number of sides. This means that there may be other areas capable of supporting development in the district, leaving this important area of Green Belt intact.

10.9b) The Green Belt between Hitchin and Letchworth is particularly narrow at this point and the development of site HT1 will result in less than 500m between the built up area of Hitchin and Letchworth. Letchworth's Green Belt was an integral part of the design of the World's First Garden City (see Appendix A) and is an important part of the heritage asset that is Letchworth Garden City. This development would harmfully reduce the separation between settlements and increase urban sprawl. This does not conform with the policies in NPPF for the Green Belt or Sustainable Development.

10.9c) There are no possible ways to ameliorate the consequent impacts on the purposes of the Green Belt here.

10.9d) The Green Belt function would be undermined by the site's allocation.

10.9e) The incursion of this site into the Green Belt would be likely to lead to proposals for development on adjacent sites.

10.9f) No, the requirements for sustainable development in NPPF ie the requirement for the environmental role is not met by the change in the Green Belt boundary for site HT1

Letchworth sites LG1 and LG3

10.12 No, the impact of these proposed developments on the integrity of Letchworth and its Green Belt (see 10.9b) mean that the developments do not comply with the NPPF policies on Green Belt, Sustainable Development or Heritage.

10.13 The reasonable alternatives are not explored in this draft plan, there has been no planning-led assessment of where new development should go in the District so as best to comply with Government Guidance, the sites explored are only those put forward by owners or developers.

10.14a) No planning-led assessment of where new development should best be located in the District has been carried out, only those sites put forward by owners and developers have been considered, and so exceptional circumstances warranting development in the Green Belt, cannot be proven. Also the scoring system used to score sites is flawed, eg. the comparison of the number of sides adjacent to existing development (as described above) and the lack of adequate heritage assessment for Letchworth. This means there may well be other sites discounted under the scoring system which could be used for development, meaning that this site could remain in the Green Belt.

10.14b) Site LG1 will result in the loss of part of the already narrow green belt to the North of the town. As described before the Green Belt was an integral part of Letchworth's design (see Appendix A) and as such is part of the heritage asset that is Letchworth, the World's First Garden City. NPPF requires the preservation and where possible, enhancement of heritage assets not their disregard and loss. The proposed Green Belt area to the North and North-West of Letchworth will be only approx. 500m between the new development and the back gardens of the first houses in Stotfold along Stotfold Road from Norton; approx 500m between the new development and the new developments (approx 310 houses and 70 apartments) currently under way on the East side of Hitchin Road (opposite the Fairfield development) which runs into the existing recently built estate in the grounds of the old Fairfield Hospital. In addition to this the Fairfield Hospital development will run into the land allocated by Central Beds in their draft Local Plan, for housing between Arlesey and Fairfield. The first four purposes of the Green Belt in para 80 of the NPPF will all be violated.

Site LG3 The Green Belt which is lost for this site provides a valuable separation between Letchworth and the village of Norton. The draft Local Plan runs down the importance of Norton as a village by saying that it has been absorbed into Letchworth, unlike Willian to the South of the town which retains its identity. Norton retains three sides of the village in contact with the countryside (much as it was on 17th century maps) and it is only the houses on the south side of Norton Road which link it to Letchworth, Willian has a similar link along Willian Road from Letchworth Gate. Letchworth's Green Belt is an integral part of the heritage asset that is Letchworth, the World's First Garden City. NPPF requires the preservation and where possible the enhancement of heritage assets not their disregard and loss.

For both of these sites it is instructive to compare the wording in the April 1996 Local Plan description of Letchworth with that in the current draft Local Plan.

1996: 5.4 *"Letchworth has the distinction of being the World's First Garden city, based on Ebenezer Howard's original concepts of a self-contained settlement within a green belt and combining the best of the town and country,"*

2014: 12.129 *"Letchworth is the world's first garden city based on Ebenezer Howard's original concept of a self contained settlement combining both town and country."*

1996: 5.4.1 (2) *Green Belt: The boundary of the Green Belt is drawn around the town with particular reference; (i) to maintaining the separate identity of the Garden City with the villages of Norton and Willian from Hitchin, Baldock and Stotfold, and (ii) to preventing its spread into areas of good quality*

agricultural land. It also performs an important role in containing the town within a rural belt, consistent with one of the most fundamental principles of the Garden City ideal.

The importance of Letchworth's Green Belt has not been changed between 1996 and 2018 by any Government guidance, although NHDC seems to have changed their view, and the loss of these areas of the Green Belt significantly harms the integrity of Letchworth's design.

10.14c) It is not possible to ameliorate the harm the loss of these areas of the Green Belt will bring. The statement about linking footpaths to Central Beds is not meaningful, the existing Greenway and footpaths in the area form good links to the West and East.

10.14d) No, the Green Belt would not continue to serve any of the five purposes of Green Belts and the Green Belt function would be totally undermined by the allocation of sites LG1 and LG3.

10.14e) It is doubtful whether the narrow slivers of Green Belt between LG1 and Stotfold and the new developments east of Fairfield could be defended in any future Plan Review, particularly as there may be new roads and other infrastructure crossing these Green Belt areas.

10.14f) No, the Green Belt boundary proposals do not meet the "Environmental role" requirement for sustainable development as it does not protect or enhance the built and historic environment, rather it does serious harm.

10.14g) The boundary to LG1 is not drawn to clear physical features and is not likely to be permanent.

10.15a) No, as LG1 is not drawn to any clear physical boundary.

10.15b) The boundary for LG1 is neither appropriate or justified, it is a harmful enclosing of an open area of grade 2 farmland significantly reducing Letchworth's Green Belt in this area and closing the gaps between settlements. The boundary for LG3 is neither appropriate or justified, it significantly reduces the Green Belt between Letchworth and Norton, Radwell and Baldock.

Appendix A

Garden Cities of Tomorrow 1902 Ebenezer Howard

"Garden City has , we will suppose grown until it has reached 32,000. How shall it grow? How shall it provide for the needs of others who will be attracted by its numerous advantages? Shall it build on the zone of agricultural land which is around it and thus forever destroy its right to be called a "Garden City"? Surely not. This disastrous result would indeed take place if the land around the town were, as is the land around our present cities, owned by private individuals anxious to make a profit out of it. For then as the town filled up, the agricultural land would become ripe for building purposes, and the beauty and healthfulness of the town would be quickly destroyed. But the land around Garden City is fortunately not in the hands of private individuals: it is in the hands of the

people: and so is to be administered not in the supposed interests of the few, but in the real interests of the whole community."

Homeland Handbook on Letchworth and Hitchin 1913 Ebenezer Howard

"A Garden City is:

A city with a belt of open fields around it, so as to secure for all time the combined advantages of town and country life."

Letter to the Daily Telegraph 1919 Ebenezer Howard (protesting against a LCC housing scheme in Tottenham being called a Garden City).

"I was the first to use the term in my book "Tomorrow" published in 1898 and I applied it to new towns to be carefully planned right away in the open country with a view to attracting industries from the overcrowded cities, and of providing homes for the people near to the scene of their daily work- each town to be surrounded by a permanent belt of agricultural land, so that its inhabitants should enjoy for all time the combined advantages of town and country life."

Green Belt Cities (2nd edition 1969) Frederick J. Osborne

Chapter 1 and Appendix 1